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RESEARCH ARTICLE

What exactly do you mean? An analysis of the speech and written document in Malaysian Bribery Cases through the Lens of Forensic Linguistics

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ARTICLE INFO	ABSTRACT
	Bribery is indeed a crime that will erode the ethical fabric of a society. These crimes usually occur when a group of people believes that power is within their grasp, which makes them invulnerable to the law. Since these crimes show no sign that they will end in the long-term future, there is a growing concern among society that our law enforcement agencies should enhance their investigation techniques to apprehend those who are corrupt and involved in bribery acts. Forensic linguistics might potentially uncover the elements of this crime. This article adopts a critical analysis method by analysing the laws, cases, and relevant documents concerning forensic linguistics. This article also analyses non-numerical data, such as text used in bribery cases in Malaysia. As such, the first objective of this article is to analyse the concept of forensic linguistics. The second objective is to determine the elements of bribery by analysing the conversations and written documents in relevant cases by applying the tools of forensic linguistics. The findings revealed that forensic linguistic experts are highly needed to assist enforcement agencies and courts, particularly in criminal cases that involve linguistics. Other than that, forensic linguistics evidence might help investigators, prosecutors and judges gain a more comprehensive knowledge of criminal cases that involve linguistic aspects. This will ensure that those accountable face justice and that no one is above the law.

INTRODUCTION

Corruption has drawn significant attention, particularly in the 1990s and recent years. In both developed and developing countries, irrespective of their size or economic orientation, governments have collapsed due to corruption allegations. This has led to the dismissal of prominent politicians, including presidents and prime ministers, from their official positions. in fact, in certain situations, entire political classes are being replaced due to crime (Michael, 1997).

Corruption is a comprehensive concept that refers to an illicit agreement reached between two parties. The purpose of this agreement is to exploit and gain unlawful advantages by disregarding and breaking the moral expectations associated with a particular role (not limited to an official position), often involving the violation of legal norms as well. In return, the other party provides tangible or intangible rewards to the person making the decisions. As such, the criminal legislation has narrowed down the definition by focusing solely on bribery (Gabor, 2014).

Michael Philips described bribery as the act of providing money or making a promise in order to persuade a passive person to neglect their obligations or responsibilities connected to their position. In all bribery cases, the decision is influenced by malicious and illicit motives. The accidental convergence of circumstances may guide the decision-maker towards a fair and just judgement, notwithstanding any malicious intentions. Initially, one would assume that it is necessary to bribe an official position such as a politician, public worker, or office holder (Gabor, 2014).

The crime of bribery is a major threat to society. Failure to curb this crime will lead to a bigger disaster for a certain country. There are many examples that can be derived from the history in which countries have faced instability and finally collapsed due to this heinous crime. For instance, The Roman Empire, the Ottoman Empire as well as the Ming Dynasty have failed to adopt good governance, which has resulted in their public servants and the military being involved in bribery. Other than that, nationalist governments such as Chiang Kai-Sek in China, Richard Nixon in America, Marcos in the Philippines and President Mobuto in Zaire also collapsed as a consequence of disregarding the danger of bribery (Mohd Tarmize, 2021).

In the Malaysian context, the practice of bribery originated during The Malacca Sultanate period. The downfall of Malacca was instigated by greed, vengeance, and political conflicts among monarchs and aristocrats. The conflicts compelled them to compromise their morals and values by exposing confidential information to the Portuguese, ultimately leading to the downfall of the Malacca Sultanate (SPRM, 2020).

Corruption is often viewed as one of the most challenging offences to investigate. In some cases, there is no trace of a crime scene, fingerprints, or eyewitnesses to investigate. The nature of this crime naturally involves discreteness and can be limited to only two persons who are content, thereby offering no motivation to disclose the truth. Despite the presence of witnesses, those who are involved in the crime are fundamentally compromised, which raises doubts about their credibility when they are called upon as witnesses for the prosecution in court. The perpetrators might have the same level of expertise as the investigators and be equipped with the knowledge to conceal their tracks (Tony, 2019).

The perpetrators might also have significant influence and demonstrate extreme cruelty in persuading individuals linked to them to maintain silence through intimidation and acts of violence, thus hindering any investigative efforts. In the modern day, highly skilled people who engage in corrupt activities would use the loopholes in legal systems that cover multiple jurisdictions and seek the aid of other experts, such as lawyers, accountants and computer experts to assist them in their illicit activities (Tony, 2019).

In addition, corruption seldom takes place separately. It usually serves as a means to enable organised crime. Throughout the years, the anti-corruption enforcement agency has conducted investigations into various types of organised criminal activities that have been enabled by corruption. This has led to law enforcement officers being apprehended and found guilty of covertly aiding narcotics traffickers and smugglers among various types, for example bank managers for concealing money laundering activities for organised crime syndicates, as well as hotel and retail staff for committing credit card fraud. Therefore, it can be deduced that in these cases, it is necessary to investigate both corruption and highly complex organised crime syndicates (Tony, 2019).

In light of combating the issue of corruption, Dalia (2020) explained several countries through their judicial authorities concentrate on the following areas:

(i) Implementing a robust legal framework capable of effectively addressing the challenges caused by corruption offences;

(ii) Enhancing the ability to combat corruption offences, including those significantly related to corruption, to effectively reduce corruption cases;

(iii) Establishing an expert group comprising specialists in all fields of work, particularly in the public sector;

(iv) Ensuring effective administration of justice while upholding the principles of law and gaining public respect; and

(v) Implementing effective legal procedures in criminal cases to achieve the objectives of criminal justice.

As such, it is therefore understood that several countries have taken measures to focus on the mentioned areas, one of which is to form a group based on experts from various fields of work.

This is due to the fact that anti-corruption investigators and prosecutors must have the capability of adducing admissible evidence in court. Such evidence is crucial for the prosecution to effectively indict corruption cases worldwide (Olukayode, 2018). For example, experts in forensic accounting are usually needed in several cases involving bribery. It acts as a fact-finding tool to determine if embezzlement has occurred, the extent of the amount being swindled, and whether criminal investigations should take place as well as the gathering of evidence in the criminal litigation (Olukayode, 2018).

However, there is one more area of forensics that was developed by experts and is able to assist investigators, prosecutors and the courts in corruption and bribery transactions, which is forensic linguistics. Henceforth, this article will elucidate further on the concept of forensic linguistics and its significance in corruption and bribery cases.

1.   LITERATURE REVIEW

McMenamin (2002) in his article stipulates that there are several explanations and arguments about the definition of forensic linguistics. Basically, forensic linguistics is applied to forensic purposes and contexts through the scientific study of language. Be that as it may, the study does not merely rely on conventional linguistic investigations, potentially resulting in unresolved issues. Statistics, subjective and objective viewpoints, as well as top-down and bottom-up practices, are all acceptable tools in forensic linguistics, provided they're proven through strong evidence and perceptible results. Thus, the field of forensic linguistics relies on the scientific study of language, which incorporates both primary and advanced aspects of linguistics.

Other academicians like Roger W. Shuy, one of the prominent scholars in forensic linguistics elucidated that there is an increasing trend to provide college courses on various aspects of forensic linguistics. This is due to the fact that forensic linguistics has emerged as a field of study that strongly depends on systemized language to help students with effective communication and expression of ideas. Regardless of the situation, it relies on linguistics, which is the scientific study of the compilation of communication attributes of language, that covers its knowledge systems (Shuy, 2006).

Apart from Roger W. Shuy, forensic linguistics experts such as Malcolm Coulthard and Johnson assert that forensic linguistics has reached a phase of maturity as an academic field. The field of forensic

linguistics has established its own professional community, known as the International Association of Forensic Linguistics, which was founded in 1993. On top of that, there is a dedicated journal called the *International Journal of Speech, Language and the Law* was established in 1994 which originally known as *Journal of Forensic Linguistics* and a biennial International Conference (Coulthard & Johnson, 2010).

Retrospectively, the term "Forensic Linguistics" was originally developed in 1968 by Jan Svartvik, a linguistics professor in England. Svartvik used this term while analysing the confessions of Timothy John Evans, who was wrongly indicted and executed for the murder of his wife and 13-month-old daughter. This case has sparked significant debates and has been viewed as a serious error and miscarriage of justice. It is in fact one of the critical debates that led to the abolition of capital punishment in the United Kingdom, back in 1965. Strangely, the definition of "Forensic Linguistics" is still somewhat unequivocal, which entails further investigation and rigorous academic article, despite its extensive adoption and comprehensive academicization in the higher-level university courses (Olson, 2008).

According to Roger W. Shuy which is another prominent forensic linguistic experts, the discipline of this field is still in its early stages of development in college and university settings (Shuy, 2006). This is due to the fact that there is growing demand for its application and the necessity for its structured solutions. Forensic journals represent concrete evidence of the field's advancement.

However, John Olson claimed that the main journal of Forensic Linguistics has been active for several years. Nevertheless, it remains progressive and invigorating in its approach. There is a significant amount of debate and argument in the entire subject, and there is also strong interest in new ideas and methodologies. However, most universities have not yet allocated significant resources for the research (Olson, 2004). For the resources to be beneficial, it must provide to the wider field of forensic linguistics. It must also not rely just on acquired knowledge, obsolete skills, or conventional technology that is associated with the past. The research must rely on sophisticated knowledge and skills, align with future developments, and be relevant to our technologically driven post-modern era (Sakakini, 2020).

From the arguments of scholars and experts mentioned, it can be concluded that the field of forensic linguistics is an interface between language, investigation and law. This field started to established in Western Countries as early as 1968, in which Professor Jan Svartvik has successfully coined the term of Forensic Linguistics in the miscarriage of justice on John Timothy Evans Case. Nonetheless, despite this field being established and remaining active mainly in academic journals from time to time, yet many universities are still reluctant to invest in this field for further research.

3.   METHODOLOGY

Basically, a forensic linguistic expert certainly has a certain basic method in analyzing a text to determine who is the actual author. From this basic method, forensic linguistic analysis can be carried out even though it must be relevant to the context, demographics, language of a community or country. In this regard, the second objective of this article is to examine several methods of analysis that have been laid out by the forensic linguistic experts which can be utilized in Corruption and Bribery Cases. The first method referred is by Dr. John Olson in his book called *More Wordcrime: Solving Crime with Linguistics* (Olson, 2018). The clues that need to be taken into account and analyse thoroughly by a forensic linguistics is enunciated as follows:

i. Spelling or any aspect of orthography (in example punctuation);

ii. Grammar;

iii. Lexicon (vocabulary); and

iv. Idioms.

In reality, all elements mentioned are interconnected as they are also integral components of language. For instance, spelling and punctuation play a crucial part in discerning the unique characteristics of the author. This method aims to equip forensic linguists with the ability to meticulously detect various aspects, such as spelling patterns and an author's usage of punctuation, in their pieces of writing.

3.1   Speech Act (Locusionary, Illocusionary, Perlocusionary)

A speech act is defined as a statement that serves a specific purpose in communication. In the theory of language behaviour, statements encompass two different meanings: locutionary and illocutionary (Jack & Schmidt, 2002). The locutionary act refers to the literal meaning conveyed by a statement, containing the specific words and the structure of the sentence utilised. Illocutionary refers to the effect that a remark or written word has on the reader or listener. For instance, when an individual utters "I am thirsty," the phrase conveys the person's physical condition of desiring water.

In its simplest form, a speech act refers to a speech or statement that carries both a propositional meaning and an illocutionary consequence. There are various speech acts that comprise a range of functions, including requests, instructions, demands, complaints, agreements and others. Perlocutionary refers to the impact of illocutionary actions in a speech on the listener, resulting in emotions such as amusement, fear, or sadness (DBP, 2023).

3.2   Speech Event in Corruption and Bribery Cases

Shuy (1993) in his book called *The Language of Bribery Cases* explained that there is a method to identify the sequential information flow in any speech events. He further described that some speech events have similar terms to the anticipated sequences of information flow and he laid out the commonalities between the speech event of business transactions and the speech event of bribery. Shuy (1993) pointed out the structure of the speech event for business transactions involves two (2) parties which are the "seller" and the "buyer," described as follows:

Phases	Buyer (JHS Managing Director)	Both	Seller
1.	Problem The Buyer explained the difficulties he/she is facing and requested assistance		The seller shows interest and offers the condition
2.	Proposed Negotiation The buyer suggest the dimensions of offers and might set conditions		The seller takes into account the dimension and might set further conditions.
3.	Offer The buyer makes offer		The seller negotiates the offer, which will

			end with an agreement or disagreement
4.	Completion The Buyer completes the transactions	Handshake; sign contract; or decline the offer	The seller completes the transaction
5.	Optional Extension The buyer might offer to extend the business relationship	Both sides might discuss other possible deals	The seller agrees or disagrees regarding future deals

Thus, Professor Roger W. Shuy pointed out that the sequence of bribery transactions is similar to business transactions as illustrated in the table. Henceforth, this article will adopt the three tools laid out by the forensic linguistics experts to analyse the corruption and bribery cases in Malaysia.

4.0   RESULTS AND DISCUSSION

4.1   Legal Provisions on Bribery Offences

In Malaysia, the offences and penalties for corruption and bribery are mentioned under the Malaysian Anti-Corruption Commission Act 2009 (Act 694). Briefly, Section 3 has laid out the forms of "gratification", which is money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantages (Act 694, 2009). In the case of *Public Prosecutor v Datuk Haji Harun bin Haji Idris*[1], Federal Judge Raja Azlan Shah in his judgement described the word "corrupt" and referred to the case of *Lim Kheng Kooi v R*, which indicates that corrupt means "doing an act knowing that the act done is wrong, doing so with evil intention". His lordship also further stated that those who are involved are "purposely doing an act which the law forbids".

Section 16 (a) and (b) stipulates the offence of accepting and offering gratification by an individual who corruptly solicits or agrees to receive for himself or any other person and corruptly gives promises or offers to any person whether for the benefit of that person or other persons (Act 694, 2009). Section 17(a) and (b) further stipulate the offence of accepting and offering gratification as an agent (government servant) in relation to his affairs and business (Act 694, 2009). However, section 23 (1), (2), (3) and (4) specifically outline the offences of using the office or position to receive gratification whether it is for an individual, family or associates (Act 694, 2009). The punishment for these offences is stated under section 24 which explicitly indicates that any individual who has committed the offences is liable to imprisonment for not more than 20 years, and a fine of not less than five times the sum or value of the gratification (Act 694, 2009).

4.2   Bribery Cases

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[1] [1977] 1 MLJ 15.

In the case of *Muhammad Hafizzudin Hassan v. Public Prosecutor*, the Appellant appealed on the decision held by the Session Court's judge on two charges. The charges are based on section 16(a) (B) and section 17(a) of the Malaysian Anti-Corruption Commission Act 2009 (Act 694). Thus, the appellant was sentenced under section 24 Act 694. The facts of the case stipulate that Muhammad Hafizzuddin bin Hassan (Appellant) is a police officer with the rank of "Inspector" stationed in the Police Headquarters of Barat Daya District, Pulau Pinang. Abdul Ghani bin Ismail (hereinafter referred as SP2) is the leading witness in this case. The police apprehended SP2's friend named Abdul Ghani bin Ismail on 20 April 2015 under the Prevention of Crime (Amendment) Act 2017 (POCA).

On 24 April 2015, SP2 called the appellant, believing that the appellant as a police officer had the authority to release his friend from police custody. The appellant answered the call and requested RM30,000.00 from SP2 as a means to pay his superiors and release his friend by deleting his files and records. That phone conversation was recorded by the Malaysian Anti-Corruption Commission Officer (SPRM Officer- hereinafter referred to as SP7). On 26 April 2015, SP2 and the appellant met in a restaurant called *Nasi Kandar Subaidah* in Pulau Pinang and the meeting was witnessed and recorded by an SPRM officer. During that meeting, the appellant repeated his request for SP2 to provide the payment of RM30,000.00. Finally, on 12 May 2015, SPRM officers provided 30 pieces of RM100 notes and requested that SP2 call the appellant, informing him that the money was ready to be delivered. The bribery transaction between SP2 and the appellant occurred in a car with a registered number **DAX 4435** driven by the appellant near the parking lot of *Restoran Subaidah*. Subsequently, after SP2 entered the appellant's vehicle, the SPRM officers apprehended them.

Therefore, it was held by the appellate court that the verdict of Sessions Court is maintained and the appeal brought by the appellant is dismissed. The appellant was sentenced under section 16(a) (B) Act 694 which is 30 months of imprisonment and a fine of RM75,000.00, and an additional 6 months of imprisonment should the appellant fail to pay the fine. The appellant was also sentenced under section 17(a) Act 694 which is 30 months of imprisonment and a fine of RM150,000.00, and an additional 8 months of imprisonment should the appellant fail to pay the fine. The sentence of imprisonment shall run concurrently.

Based on the material facts of the case, this article shall adopt forensic linguistics tool to analyse whether or not the bribery transaction occurred using the speech act analysis as illustrated below:

Facts of the case (*Muhammad Hafizzudin Hassan v. Public Prosecutor)*	Forensic Linguistics Analysis (Speech act analysis)
"On 24 April 2015, SP2 called the appellant, believing that the appellant as a police officer had the authority to release his friend from police custody. **The appellant answered the call and requested RM30,000.00 from SP2 as a means to pay his superiors and release his friend by deleting his files and records**. **That phone conversation was recorded** by the Malaysian Anti-Corruption Commission Officer (SPRM Officer- hereinafter referred to as SP7)".	*On 24 April 2015, SP2 called the appellant, believing that the appellant as a police officer had the authority to release his friend from police custody. The appellant answered the call and requested RM30,000.00 from SP2 as a means to pay his superiors and release his friend by deleting his files and records.* (Locutionary) *On 26 April 2015, SP2 and the appellant met in a restaurant called Nasi Kandar Subaidah in Pulau Pinang and the meeting was*

"On 26 April 2015, SP2 and the appellant met in a restaurant called *Nasi Kandar Subaidah* in Pulau Pinang and the meeting was witnessed and recorded by an SPRM officer. **During that meeting, the appellant repeated his request for SP2 to provide the payment of RM30,000.00".** "Finally, on 12 May 2015, SPRM officers **provided 30 pieces of RM100 notes and requested that SP2 call the appellant, informing him that the money was ready to be delivered. The bribery transaction between SP2 and the appellant occurred in a car with a registered number DAX 4435 drove by the appellant near the parking lot of *Restoran Subaidah*.** Subsequently, after SP2 entered the appellant's vehicle, the SPRM officers apprehended them".	*witnessed and recorded by an SPRM officer. During that meeting, the appellant repeated his request for SP2 to provide the payment of RM30,000.00* (Illocutionary) *Finally, on 12 May 2015, SPRM officers provided 30 pieces of RM100 notes and requested that SP2 call the appellant, informing him that the money was ready to be delivered. The bribery transaction between SP2 and the appellant occurred in a car with a registered number DAX 4435 drove by the appellant near the parking lot of Restoran Subai*dah (Perlocutionary)

Based on the critical speech act analysis comprising locutionary, illocutionary and perlocutionary, it can be deduced that bribery transactions did occur between SP2 and the appellant. These events were also supported by the direct evidence adduced by the main witness and audio recordings monitored by the SPRM officers. The next case that this article shall analyse is *Public Prosecutor v. Rosmah Mansor*. The facts of the case indicated that the accused at the material time was the wife of the Prime Minister through her Special Officer Rizal Bin Mansor (hereinafter referred as SO) corruptly received a gratification from the managing director of Jepak Holdings Company (JHC), Saidi Bin Abang Samsudin worth RM187.5 million which is 15% of the contract value. The gratification is a means for JHC to obtain a Solar Project in Sarawak worth RM1.25 billion through direct negotiation from the Malaysian Ministry of Education. The offence committed is punishable under Section 16(a) and subsection 24(1) Act 694.

The second charge was on 7 September 2017, the accused received a bribe worth RM1.5 million from Saidi Bin Abang Samsudin who is the managing director of Jepak Holding Company as a means to obtain a Solar Project worth RM1.25 billion through a direct negotiation from the Malaysian Ministry of Education. If found guilty, the accused is punishable under Section 16(a) and subsection 24(1) Act 694.

The third charge was on 20 December 2016, the accused through her SO has received a bribe worth RM5 million from Saidi Bin Abang Samsudin which is the managing director of Jepak Holding Company as a means to obtain a Solar Project worth RM1.25 billion through a direct negotiation from the Malaysian Ministry of Education. The offence committed is punishable under Section 16(a) and subsection 24(1) Act 694. It was held by the High Court Judge that the accused was found guilty for all the three (3) charges. The accused was sentenced to 10 years of imprisonment for each charge and a fine of RM970 million, an additional 10 years of imprisonment should the accused failed to pay the fine.

Based on the case mentioned, this article will analyse the facts of the case by adopting the speech event analysis stipulated by by Roger W. Shuy to determine whether or not the accused was involved in bribery transactions as follows (Shuy, 1993):

Phases	Buyer (JHC Managing Director)	Both	Seller (The Accused and The Special Officer)
1.	Problem *The gratification is a means for JHC to obtain a Solar Project in Sarawak worth RM1.25 billion through direct negotiation from the Malaysian Ministry of Education* The Managing Director of JHC approach the accused to state his problems.		The accused agreed to help using her position as the Prime Minister's wife
2.	Proposed Negotiation *The accused corruptly received a gratification from the managing director of Jepak Holdings Company (JHC), Saidi Bin Abang Samsudin worth RM187.5 million, which is 15% of the contract value.* The entire negotiation was that the accused and the Managing Director of JHS agreed to offer up to RM187.5 million which is 15% of the contract value.		The accused agreed on the terms.
3.	Offer *On 7 September 2017, the Managing Director delivered RM1.5 million to the accused.* *On 20 Disember 2016, the Managing Director of JHS delivered to the SO a sum of RM5 million.* The Managing Director of JHS offered the accused to deliver the sums of money through her SO based on different dates.		The accused accepted the offer through her SO.

4.	Completion *On 7 September 2017, the accused has received a bribe worth RM1.5 million from Saidi Bin Abang Samsudin which is the managing director of Jepak Holding Company.* *20 Disember 2016, the accused through her SO has received a bribe worth RM5 million from Saidi Bin Abang Samsudin which is the managing director of Jepak Holding Company.* The JHC Managing Director delivered the sum of money through SO.	Accept the offer based on the delivery of the money on different dates	The accused through her SO received the money.
5.	Optional Extension none	none	none

According to critical analysis of identifying the sequential information flow of this case, the chronology has ambiguously indicated that the elements of corruption and bribery did happen through a series of speech events. There were several incidents of the accused through her SO corruptly receiving bribes from the JHC Managing Director. As such, the analysis conducted from both bribery cases indicates that Forensic Linguistic tools are relevant and practical to be utilized in criminal cases. However, it highly depends on the experience and critical analysis conducted by Forensic Linguistic experts to determine whether the elements of crime does exist in certain cases.

5.   CONCLUSION

Forensic linguistic experts play a significant role in assisting the government enforcement agency, prosecutors and courts to cautiously identify the elements of corruption and bribery in certain cases. This is due to the fact that the parties involved in the bribery transactions will employ their own method of communication to accomplish their goals. Most importantly, forensic linguists must employ analytical approaches that effectively aid the courts in fully comprehending the facts of the case through linguistic analysis. Be that as it may, the findings of this article indicate that forensic linguistics experts are not being optimised in the investigation and evidential process, especially in cases involving corruption and bribery. The consequences of this issue could lead the investigators and courts to misinterpret the actual meaning of alleged parties involved in that transaction, notably for the cases monitored by the anti-corruption agency. There are several cases in which one party did not have any intention to receive the gratification but was misinterpreted and charged without strong evidence. Therefore, it is imperative for experts like forensic linguists to assist investigators and courts in ensuring every corruption and bribery case is subjected to a trial that upholds principles of justice and impartiality.

6.   ACKNOWLEDGEMENT

6.   REFERENCE

Journal Article

Dalia Magereschu. (2020). Criminal Investigation of the Corruption Crimes: Evidence and Procedure in an Interdisciplinary Approach, ResearchGate Publication, p1241.

Gabor Szabo. (2014). Moral Considerations on Bribery and Corruption, University of Pecs, Faculty of Law, Journal of Eastern-European Criminal Law, p38-39.

Johanston, Michael. (1997). Public Officials, Private Interest and Sustainable Democracy, When Politics and Corruption meet, Institute for International Economics: Washington, p61-82.

McMenamin, G.R. (2002). *Forensic Linguistics Advances in Forensic Stylistics.* Boca Raton, London, New York, Washington: CRC Press, p67.

Mohd Tarmize Abdul Manaf. (2021). Pencegahan Rasuah Ke Arah Menginsankan Pendidikan Di Malaysia, Suruhanjaya Pencegahan Rasuah Malaysia (SPRM), p15.

Olukayode Sorunke. (2018). Forensic Accounting Investigation Techniques and Successful Prosecution of Corruption Cases in Nigeria, International Journal of Academic Research in Accounting, Finance and Management Sciences (IIIFARD): New Jersey, p38.

Sakakini, adel. (2020). Forensic Linguistics: An Applied Theory, BAU Journal –Society, Culture and Human Behavior: Vol. 1, p5.

SPRM & UPSI. (2020). Panduan Pendidikan Pencegahan Rasuah di Sekolah, Suruhanjaya Pencegahan Rasuah Malaysia (SPRM): Putrajaya, p4.

Shuy, R.W. (2006). *Linguistics in the Courtroom A Practical Guide.* New York: Oxford University Press, p135-136.

Tony Kwok Man-Wai (2009). Investigations of Corruption Cases, The Eleventh International Training Course on The Criminal Justice Response to Corruption Visiting Experts' Papers: Hong Kong, p140.

Pusat Rujukan Persuratan Melayu (PRPM). Dewan Bahasa dan Pustaka. Definition for "Perlocutionary". Retrieved from: https://prpm.dbp.gov.my/Cari1?keyword=perlokusionari&d=226112&#LIHATSINI

Books

Coulthard, M. & Johnson, A. (2010). The Routledge Handbook of Forensic Linguistics. New York: Routledge, p2.

Jack C. Richards and Richard Schmidt. (2002). *Dictionary of Language Teachings and Applied[2] Linguistics.* Longman Pearson Education, London, p498.

John Olson. (2018). *More Word Crime: Solving Crime with Linguistics*, Bloomsbury Academic, London, p12.

John Olson, Forensic Linguistics, Continuum International Publishing Group, London, 2008, p4.

Olsson, J. (2004). Forensic Linguistics an Introduction to Language, Crime, and the Law. New York: Continuum, 2004, p7.

Roger W. Shuy. (2013). *The Language of Bribery Cases*, Oxford University Press, United Kingdom, p53.

Roger W. Shuy. (1993). *Language Crimes*, Blackwell: Oxford, p21-22.

Laws

Malaysian Anti-Corruption Commission Act 2009 (Act 694).

Cases

Muhammad Hafizzudin Hassan v. Public Prosecutor [2023] 1 LNS 899.

Public Prosecutor v. Rosmah Mansor [2022] 9 CLJ.