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Social media and public perception of crime in Kazakhstan and Southeast Asia

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Abstract. The aim of the study was to analyse the mechanisms and consequences of social media influence on public perceptions of crime. The research design was based on a comparative case study methodology. Through content analysis and document review, triangulation of three types of data (official statistics, legal and regulatory acts, and high-profile case events) was conducted for three countries: Kazakhstan, Malaysia, and Singapore. The analysis covered the period from 2019 to 2025. The results of the study identified three distinct models of state strategy. In Kazakhstan, a model of "reactive transparency" was identified, in which social media became an instrument of public oversight; public pressure, amplified by online broadcasting of high-profile court proceedings, led to the adoption of laws combating domestic violence and a paradoxical increase in public trust in the judiciary from 55.2% to 62.0% between 2023 and 2024. In contrast, Singapore's "proactive control" model employs a comprehensive legal architecture, including the Protection from Online Falsehoods and Manipulation Act, to actively manage the information narrative, ensuring a consistently high sense of safety among 97% of the population, while restricting public discourse. Malaysia's "punitive uncertainty" model, grounded in broadly interpreted legislation, demonstrated a paradox whereby 65% of citizens expressed trust in police operational performance, yet 50% simultaneously regarded the inefficiency of law enforcement as one of the main causes of crime. The findings indicate that the state's chosen strategy for regulating the online environment is a more significant factor in shaping public trust than official crime statistics. Based on the analysis, recommendations were proposed for transitioning towards proactive transparency, countering disinformation, and investing in digital literacy. The practical significance lies in the fact that the study's conclusions may be used by law enforcement agencies in developing effective communication strategies. The proposed recommendations on proactive transparency and disinformation countermeasures are aimed at strengthening public trust within the digital environment

Keywords: compelled speech; legitimacy of authority; online environment; state regulation; internet users

Introduction

The relevance of this study arises from the fact that citizens' perceptions of the effectiveness of law enforcement agencies and crime rates are increasingly shaped not by official data, but by narratives circulating within the online sphere. In the modern world, social media has become a dominant instrument in shaping public opinion, exerting a decisive influence on socio-political processes and the international image of states. This influence is particularly evident in countries undergoing rapid digital transformation, including Kazakhstan. This process directly affects national security and the international reputation of the country – a strategic resource that determines investment attractiveness and competitiveness on the global stage. Uncontrolled dissemination of information in the digital environment generates challenges related to disinformation, manipulation of public opinion, and the spread of destructive ideologies. The algorithmic mechanisms of social networks, which create "information bubbles", only amplify this effect, making consensus more difficult to achieve.

In conditions where trust in state institutions becomes a key factor of social stability, analysing the mechanisms that shape such trust in the digital environment acquires primary importance. The study by L.F. Chaparro *et al.* (2021) demonstrated the possibility of quantitatively assessing perceptions of safety through sentiment analysis of social media messages, thereby technologically confirming the link between online discourse and the real sense of threat among the population. Therefore, examining the interrelation between online discourse, the actual criminogenic situation, and state communication strategies was essential for understanding contemporary social dynamics. The scientific community has devoted significant attention to various aspects of social media influence in the context of Kazakhstan and Central Asia.

A number of researchers have focused on the destructive potential of online platforms. D. Sharipova & S. Beissembayev (2023) established a direct connection between the spread of online propaganda and youth radicalisation leading to violent extremism. In turn, A. Khamzin *et al.* (2022) highlighted the use of digital technologies by criminals for human trafficking recruitment. The problem was further exacerbated by the spread of false information: A.B. Akynbekova *et al.* (2024) found that news content on Facebook was the most susceptible to fake information. This vulnerability was particularly high among young people, whose online behaviour, according to A.U. Nussipova & G.K. Slanbekova (2024), was characterised by a lack of cyber threat awareness. The importance of addressing these threats was emphasised by G. Sultanbayeva *et al.* (2024), who considered digital literacy a key tool for identifying fake news. A study by M.S. Al-Zaman (2021) in India also demonstrated that fake news on crime and politics were among the most widespread, underlining the universality of this issue. In addition to disinformation, hate speech emerged as another threat. As shown by O. Ștefăniță & D.M. Buf (2021), it exerts a negative psychological impact on vulnerable groups, while legal frameworks to counter it – as in the United Kingdom – are continually being adapted to new digital realities.

Meanwhile, other researchers examined more complex effects of social media influence. G. Ibrayeva & A. Nurshaikhova (2024) demonstrated that the emotional dynamics of online discussions in Kazakhstan could intensify distrust toward the judiciary. The study by M. Näsi *et al.* (2021) in Finland revealed that consuming crime news through traditional media was more strongly associated with fear of violence than exposure through social media. This provides important context for comparison with the Kazakhstani situation, where the interactivity and emotional contagion of social networks became the main catalysts for public reactions. Perceptions of risk and punishment, as noted by R. Apel (2022), are subjective and continuously updated through lived experience – including that transmitted via social networks – making this channel crucial in shaping perceptions of justice. This process is further complicated by citizens' willingness in non-democratic contexts, such as Kazakhstan, to partially accept new forms of surveillance, such as algorithmic policing, in exchange for increased efficiency – a phenomenon described as an "authoritarian bargain". This review of the academic literature has shown that, although individual aspects of the problem have been thoroughly studied, there remains a gap in comprehensive comparative analysis of state strategies for managing public perceptions of crime in the digital space. In particular, there is a lack of research systematically comparing the model emerging in Kazakhstan with those in technologically advanced Asian countries.

The objective of the study was to identify the mechanisms by which the image of crime is constructed within public consciousness under the influence of online platform content. To achieve this objective, the following tasks were set: to analyse the impact of social media on public perceptions of crime and the legitimacy of law enforcement institutions in the Republic of Kazakhstan; to conduct a comparative analysis of legal and communication strategies for managing online discourse in Kazakhstan, Singapore, and Malaysia; and, based on this comparative analysis, to develop recommendations for improving communication policy.

Materials and Methods

The study was based on a comparative multiple case study encompassing three countries: Kazakhstan, Singapore, and Malaysia. This design made it possible to examine each case separately and to conduct a systematic comparison to identify common patterns. The primary methods of data collection and analysis included document analysis (covering legislative and regulatory acts and reports), secondary analysis of official statistics and sociological surveys, as well as qualitative content analysis of media materials and official communications. The observation period spanned from January 2019 to September 2025, enabling the recording of key legislative changes and social processes in the

selected countries. The selection of Kazakhstan, Singapore, and Malaysia for comparative analysis was grounded in the logic of similar-systems design. All three are Asian states with comparable baseline parameters – high internet penetration rates and active social media engagement. At the same time, they demonstrate distinct models of political regime and, consequently, differing strategies of state regulation of the online sphere. This variation in the key studied parameter (state regulation), combined with similarity in baseline conditions (level of digitalisation), renders them relevant for comparative analysis of the impact of state policy on public perceptions of crime.

Official reports of national statistical bureaus and leading sociological agencies for 2023-2025 were included. The following indicators were analysed: levels of recorded crime by category (homicide, theft, internet fraud) (Prosecutor General's Office of Kazakhstan, n.d.), as well as levels of public trust in law enforcement and judicial institutions. Specifically, for Kazakhstan, two survey waves by the Bureau of National Statistics were used (April-May 2023 and October-November 2024): On public confidence… (2023), Public confidence in law… (2025), as well as Statistics of crime (n.d.), U.S. Department of State (n.d.) and Penal Code of the Republic of Kazakhstan No. 226-V (2014) for Malaysia – an Ipsos report (Loheswar, 2024), Act of Malaysia No. 854 (2024); and for Singapore – the Ministry of Home Affairs overview (Overview of Safety…, 2025). The analysis also incorporated current editions of key laws regulating the information environment and law enforcement activities in the three countries. Among them: for Kazakhstan – Law of Kazakhstan No. 401-V ZRK (2015) and Law of the Republic of Kazakhstan No. 72-VIII (2024); for Singapore – the Protection from Online Falsehoods and Manipulation Act (POFMA) (n.d.), Act of Singapore (2009), the Act of Singapore No. 28 (2021), and Broadcasting Act of the Republic of Singapore (1994); for Malaysia – the Act of Malaysia No. 588 (2006) and the Act of Malaysia No. 15 (2006). To establish the basic parameters of the digital environment, the Digital 2025 series reports for each country were analysed (Kemp, 2025a; 2025b; 2025c). These sources provided quantitative indicators of internet penetration, social media usage, and platform popularity. For an in-depth analysis, key events and documents illustrating state-society interaction were selected. The inclusion criterion was high public resonance and documented impact on legal or communication policy. The corpus included: online broadcasts of court hearings in the Bishimbayev case (04/10/2024. Part 1. Online broadcast…, 2024; Serikpaev, 2024); official press releases by the Singapore Government concerning the application of the POFMA (Issuance of POFMA…, 2024); and reports of international human rights organisations – Amnesty International (Singapore 2024, n.d.) and Human Rights Watch (Malaysia Events of 2024, 2024) – addressing freedom of expression in Singapore and Malaysia.

Data analysis was conducted in two stages. In the first stage, each country was examined as a separate case. Through qualitative content analysis, legislative acts and media materials were studied to reconstruct the national model of interaction between the state, society, and the online sphere. Coding was performed according to the following categories: type of state strategy (proactive/reactive), key regulatory instruments, mechanisms of influence on discourse (censorship, public pressure, "deterrent effect"), and dominant narratives. At the second stage, the three identified models were compared using a unified matrix of criteria, which made it possible to reveal their shared and distinctive features. This two-step analytical strategy enabled not only a description of each national model but also an explanation of the reasons for differences in the dynamics of public trust and the nature of public discourse. Data systematisation was carried out using Microsoft Excel spreadsheet software.

Results

Kazakhstan: The impact of court hearings broadcasts on the legitimacy of the law enforcement system

The relationship between digital media and public perceptions of crime is a complex phenomenon determined not only by the degree of technological penetration but also by each state's unique socio-legal context. In 2025, Kazakhstan's information environment was characterised by deep digital integration. Statistical data showed that 92.9% of the population were active internet users, and 75.7% used social networks (Kemp, 2025a). Official crime statistics revealed a paradox: against the backdrop of an overall decline in traditional crimes such as theft (-27.6%) and homicide (-18.8%), there was a sharp rise in internet fraud by 24.7% (Prosecutor General's Office of Kazakhstan, n.d.). This imbalance created favourable conditions for the formation of negative perceptions of safety. Scholarly discussion of these data has demonstrated that citizens' trust in government under such conditions may diverge from the actual indicators of its effectiveness (Koh & Baek, 2023). At the same time, official surveys indicated a high level of trust in the police (64.4%) and the prosecution service (65.2%) (Statistics of crime, n.d.). This paradox was explained by the fact that the baseline level of trust proved vulnerable during high-profile events, where the quality of state communication became decisive (Burkitbayeva, 2024). The legislative framework – in particular, the Law of Kazakhstan No. 401-V ZRK (2015) – formally enshrined the principles of openness. However, there was a clear gap between the statutory provisions requiring proactive information dissemination and the actual communication practices of law enforcement bodies, which often remained reactive. This gap was partly attributable to the complexity and specificity of the challenges faced by law enforcement structures. According to the report of the U.S. Department of State (n.d.), Kazakhstan functioned as a key transit country for Afghan-origin narcotics and was increasingly becoming both a destination and transit point for synthetic drugs. Law enforcement agencies were engaged in an ongoing struggle against transnational threats, while criminal

networks employed increasingly sophisticated methods for moving drugs, money, and people across the country's territory. Such an operational context required complex, often lengthy and non-public investigations. The need to maintain investigative secrecy for the effective counteraction of organised crime conflicted with the public demand for immediate and full transparency, actively amplified through social media. Thus, the reactive nature of communication was not only a manifestation of institutional culture but also a strategic necessity, creating tension between operational security and civil society's expectations of openness. This discrepancy was actively exploited in online discussions to criticise state institutions, turning social media into an instrument of informal civic oversight. This trend corresponds to global processes in which online platforms serve as arenas for the discussion of socially significant issues, including hate crimes, as documented in the United Kingdom by N. Ahmad *et al.* (2023).

This process was reflected in the public discussion of court broadcasts, which not only enhanced legal awareness but also stimulated legislative changes (Ibrayeva *et al.*, 2025). A case in point is the case of Kuandyk Bishimbayev (Sydorzhevskyi, 2024), a former Minister of National Economy, accused of murdering his wife under two articles of the Penal Code of the Republic of Kazakhstan No. 226-V (2014). The first was Article 110, Part 2, Clause 1 of the CC RK (Criminal Code of the Republic of Kazakhstan) – torture; this charge pertained to the systematic infliction of physical and mental suffering upon Saltanat Nukenova (Kuandyk Bishimbayev's wife). The second was Article 99, Part 2, Clause 5 of the CC RK – murder committed with particular cruelty; this was the principal charge, indicting him for the intentional deprivation of life manifesting exceptional ruthlessness towards the victim. Given the significant public resonance, the press service of the Supreme Court announced the decision to provide an online broadcast of the open court hearings in this case (Serikpaev, 2024). The live stream of this trial on the official channel of the Supreme Court of the Republic of Kazakhstan "Qazaqstan Respublikasynyń Joǵary Soty" (04/10/2024. Part 1. Online broadcast…, 2024) sparked active public discussion on social media. Millions of citizens followed the hearings in real-time, transforming the judicial proceedings into an instrument of legal education. The high emotional engagement of the audience and active online discussions created significant public pressure on the authorities. Public oversight, enabled by digital technologies, prevented this case from being overlooked and amplified the societal demand for zero tolerance towards any forms of domestic violence. It was this community-driven pressure that acted as a catalyst for specific legislative initiatives. The result was the strengthening of criminal liability for domestic violence, demonstrating a direct link between digital transparency, public mobilisation, and legislative reform in the sphere of protecting the rights of women and children. A specific legislative initiative arising from the public resonance surrounding the Bishimbayev case was the adoption of the Law of the Republic of Kazakhstan No. 72-VIII (2024), which was signed by the President of Kazakhstan in April 2024. Analysis of official data on public trust before and after the period of high-profile broadcasts revealed a notable positive dynamic. A comparison of survey results from April-May 2023 (prior to the broadcasts) and October-November 2024 (during the Bishimbayev case) demonstrated an increase in trust towards key legal institutions. Specifically, the level of complete trust in the judicial system rose from 55.2% in 2023 to 62.0% in 2024. A similar increase was recorded for other law enforcement agencies: trust in the police increased from 57.5% to 64.3% and in the prosecutor's office – from 57.1% to 66.1% (On public confidence…, 2023; Public confidence in law…, 2025). These statistical trends suggest that a policy of radical transparency, despite subjecting the justice system to intense public scrutiny (during the period of social media discussion), ultimately had a positive impact on its legitimacy (Gritsenko *et al.*, 2025). The open broadcasts helped dispel entrenched perceptions of judicial opacity and corruption, thereby strengthening public trust in the institution. A systematic analysis of the challenges faced by the state and its responses to them is presented in Table 1.

Table 1. Analysis of challenges and state responses in the sphere of law and order in Kazakhstan (2024-2025)

Sphere of Challenge	Manifestation	Documented State Response	Outcome
Traditional Crime	Decline in rates of theft (-27.6%), homicide (-18.8%), and other physical crimes.	Standard law enforcement activities.	Positive trend in official statistics.
Cybercrime	Sharp increase in online fraud (+24,7%).	Training of personnel for investigating online crimes.	Recognition of the threat as a priority.
Transnational Crime	Status as a key transit country for narcotics.	Enhanced border control, international cooperation.	Increased operational capacity.
Public Resonance (The Bishimbayev Case)	Mass public engagement in discussing the case on social media.	Adoption of a decision to live-stream court proceedings.	Increased legal literacy, formation of public pressure.
Pressure for Legal Reforms	Public demand to criminalise domestic violence.	Adoption of the "Saltanat Law".	Specific legislative amendments, enhanced accountability.
Public Trust	Paradox between baseline trust and its decline during crises; criticism of reactive communications.	Forced transparency (live-streaming).	Increased trust in the judicial system (+6.8 p.p.) and police (+6.8 p.p.) following the period of live-streaming.

Source: compiled by the author based on an analysis of data from the Prosecutor General's Office of Kazakhstan (n.d.), U.S. Department of State (n.d.), On public confidence… (2023), Public confidence in law… (2025), G. Ibrayeva *et al.* (2025)

Thus, the case of Kazakhstan illustrated a unique model where societal digitalisation acted as a catalyst for informal public oversight. The enforced transparency, demonstrated through online broadcasts of high-profile trials, created unprecedented pressure on the legal system. This process, while revealing shortcomings and provoking criticism, ultimately led to strengthened trust in state institutions. Society, having gained access to the mechanisms of justice, was able not only to observe but also to influence, which materialised in concrete legislative reforms and a measurable increase in the legitimacy of law enforcement agencies and courts.

Singapore: State control over the informational narrative

Singapore represents a model where the state assumes a proactive and dominant position in managing the information space to maintain a high level of public trust. This strategy functions in conditions of total societal digitalisation. As of early 2025, Singapore had one of the highest internet penetration rates in the world, covering 95.8% of the population, or 5.61 million people (Kemp, 2025c). The social media usage rate was also high at 88.2% of the total population, equivalent to 5.16 million users. The hyper-connectivity of society was underscored by the fact that the number of active mobile connections reached 10.5 million, constituting 179% of the total population. In this environment, where YouTube (5.16 million users), Facebook (3.70 million), and TikTok (3.63 million adult users) serve as key arenas for public discourse, the state has developed a control mechanism (Kemp, 2025c). However, this stability in the management position existed against a backdrop of serious challenges arising precisely within the digital environment. While the number of physical crimes, such as theft and robbery, remained stable or even decreased, online scams continued to be a key problem, with the number of reported cases and the amounts of losses growing (Overview of Safety…, 2025).

Furthermore, the authorities expressed concern over the deteriorating regional drug situation, emphasising that drug traffickers are actively using social networks and messengers to spread misinformation about drugs and facilitate their sale. Of particular concern to the authorities was the increasing number of new drug abusers among youth, partly associated with the proliferation of permissive attitudes towards drugs on social media (Overview of Safety…, 2025). In response to these threats, the state developed a comprehensive strategy combining stringent legislation and proactive communication. A key instrument of state policy in this sphere has been the Protection from Online Falsehoods and Manipulation Act (n.d.), enacted in 2019. This act embodies a unique regulatory philosophy: instead of direct censorship, it primarily employs a mechanism of "compelled expression", obliging platforms to place government corrections alongside content deemed false. This allows the state not merely to remove information but to intervene in the discourse with its own "authoritative" version, representing a technocratic solution aimed at the "informational immunisation" of the population against disinformation, particularly in the context of the rapid growth of online scams, which have become the principal criminal threat in the country. A practical example of this mechanism's application is the case in December 2024, when the Ministry of Home Affairs issued a Correction Direction to the news portal "The Online Citizen" (Issuance of POFMA…, 2024). The portal had published an article and social media posts claiming that the Singapore government uses POFMA to suppress dissent regarding the death penalty, which the authorities deemed false. However, instead of demanding the removal of the publication, the Direction required "The Online Citizen" to place a correction notice alongside each of its publications, with a link to the official government clarification. The official press release emphasised that this approach does not restrict dissent but merely allows readers to access the government's position alongside the initial statement so they can "make their own conclusions" (Issuance of POFMA…, 2024). This case clearly demonstrates how POFMA is used for the "informational immunisation" of the population, actively countering narratives the authorities consider harmful, especially in the context of the rapid growth of online scams, which have become the primary criminal threat in the country. It should be noted that POFMA is not an isolated instrument but part of a broader, multi-layered system of legal regulation of the online space. This strategy is complemented by other powerful legislative acts, such as the Broadcasting Act of the Republic of Singapore (1994), which, through a licensing system, extends its control to online news resources, requiring them to adhere to content standards. Furthermore, the Act of Singapore No. 28 (2021) was passed, granting the government powers to block content and expose information campaigns deemed to be hostile foreign operations. Together, these laws create a comprehensive control architecture, enabling the authorities to respond swiftly to a wide spectrum of threats, from disinformation and scams to foreign influence, ensuring the dominance of the official narrative in the digital environment.

However, according to Amnesty International's 2024 report (Singapore 2024, n.d.), the Government of Singapore actively utilised legislation to restrict the activities of civil society activists, particularly those opposing the death penalty. Throughout the year, multiple correction directions were issued under the POFMA Act (Issuance of POFMA…, 2024) against the Transformative Justice Collective (TJC) (n.d.), an activist group, for their statements concerning capital punishment. In October, a photo exhibition organised by TJC to mark the World Day Against the Death Penalty was banned on the grounds that it "undermined national interests" (Singapore 2024, n.d.). In December, the government went further by designating the TJC website and social media accounts as "declared online locations". This compelled the organisation to display a notice on its platforms stating that they had "communicated multiple falsehoods" and prohibited them from receiving online financial contributions. One of TJC's members, activist

Annamalai Kokila Parvathi, also received individual correction directions under POFMA and became the subject of an investigation after becoming the first person in Singapore to refuse compliance with a correction order (Singapore 2024, n.d.). As of 2025, the organisation's website displays the following official notice: "Multiple falsehoods have been communicated on this website. Viewers should exercise caution when accessing this website for information. This website is a declared online location in Singapore under Section 32 of the Protection from Online Falsehoods and Manipulation Act (n.d.). For more details, please visit the link below. Providing financial support to support, help or promote the communication of false statements of fact in Singapore on a declared online location is prohibited under Section 38 of POFMA" (Transformative Justice Collective, n.d.). This statement confirms that governmental requirements were duly fulfilled. At the same time, executions for drug-related offences continued, raising, according to the report, serious concerns about the fairness of judicial proceedings, as several of those executed still had pending appeals (Singapore 2024, n.d.). Moreover, the authorities invoked the Act of Singapore (2009), which requires permits for all public assemblies, to initiate investigations into activists protesting against arms sales to Israel or expressing concern about the conflict in Gaza. Collectively, these cases, documented by Amnesty International (Singapore 2024, n.d.), indicate that Singapore's legislative framework is utilised not only to counter disinformation but also to systematically restrict freedom of expression and suppress dissenting activity, thereby enabling the government to maintain a dominant official narrative in the digital environment.

To summarise, Singapore's model exemplifies an active and comprehensive form of state intervention in the digital sphere. In the context of digitalisation and the migration of criminal threats into the online domain, the authorities employ a multilayered legal architecture through the POFMA (Protection from Online Falsehoods and Manipulation Act, n.d.). This system serves a dual purpose: on one hand, it is officially aimed at protecting citizens from disinformation, fraud, and foreign interference; on the other, as documented by human rights organisations, these very instruments are systematically deployed to suppress dissent, limit criticism of the government, and neutralise civil society activism (Singapore 2024, n.d.). The result is a carefully managed informational narrative that fosters public trust in state institutions, yet achieves this at the expense of considerable restrictions on civil liberties and open public discourse.

Malaysia: Legal uncertainty and the chilling effect

Malaysia demonstrated a third model characterised by high digital engagement among the population amid extensive and ambiguous legislative regulation. As of early 2025, the country had nearly universal internet penetration, covering 97.7% of the population, or 34.9 million individuals (Kemp, 2025b). The number of social media users reached 25.1 million, equivalent to 70.2% of the total population, with YouTube, Facebook, and TikTok being the dominant platforms. Against this backdrop, sociological survey data from 2024 presented, at first glance, a positive picture of public opinion. According to the Ipsos Malaysia Crime Monitor (Loheswar, 2024), Malaysian society exhibited growing trust in law enforcement authorities. Sixty-six per cent of respondents believed that the police treated all citizens with equal respect, while 65% expressed confidence in the police's ability to prevent and solve crimes. Moreover, 31% stated that crime rates in their local areas had decreased over the past year, indicating an increasing sense of security. However, a deeper analysis of the same survey revealed a fundamental contradiction in public perception. When asked about the causes of crime, 50% of respondents cited ineffective law enforcement, while 39% pointed to a corrupt political environment (Loheswar, 2024). These figures significantly exceeded global averages and highlighted deep-seated mistrust in the institutional integrity of law enforcement and political systems. This paradox – where high confidence in police operational capacity coexists with perceptions of systemic inefficiency – can be explained through the context of legal regulation.

Like other countries in the region, Malaysia has faced a transformation in the structure of criminality, with cybercrime emerging as the leading category. Yet, according to a Human Rights Watch report, in 2024 the government not only refrained from relaxing but instead expanded the scope of repressive legislation governing the online sphere (Malaysia Events of 2024, 2024). The principal regulatory instrument for online discourse in Malaysia is the Act of Malaysia No. 588 (2006), particularly Section 233, alongside the Act of Malaysia No. 15 (2006). According to the report (Malaysia Events of 2024, 2024), throughout 2024 the authorities routinely employed these laws – both characterised by broad and vague provisions – to criminalise freedom of expression.

The practical application of these laws is illustrated by specific cases: in April, political activist Badrul Hisham Shaharin was charged with sedition for a Facebook post alleging the Prime Minister's involvement in granting a casino licence. In May, blogger Wan Muhammad Azri Wan Deris was charged under the same provision for a post on the X platform. Even former Prime Minister Muhyiddin Yassin was accused of sedition for questioning the previous king's use of constitutional power (Malaysia Events of 2024, 2024). Furthermore, the new Act of Malaysia No. 854 (2024), which came into force in August 2024, further broadened governmental powers over online expression.

An examination of this legal framework reveals that, unlike Singapore's POFMA (Protection from Online Falsehoods and Manipulation Act, n.d.), Malaysia's Communications and Multimedia Act (Act of Malaysia No. 588, 2006) allows prosecution for a much broader range of statements. The application of Section 233 POFMA is often asymmetric and disproportionately targets civil activists and journalists, thereby undermining trust in the impartiality of the legal system itself. This results in a so-called chilling

effect, impeding objective assessment of public sentiment, as discussions – particularly those concerning corruption or misconduct within law enforcement – are pushed into closed or private groups. The report also documents the case of activist Mukmin Nantang, who exposed the forced evictions of the indigenous Bajau Laut community and subsequently became the subject of a police investigation for sedition (Malaysia Events of 2024, 2024). Thus, in Malaysia, perceptions of criminality are shaped within a context of legal uncertainty, where fear of prosecution for public expression can suppress open dialogue. This creates a situation in which visible online discourse does not necessarily reflect actual societal sentiment, potentially leading to the accumulation of latent discontent and scepticism regarding the efficiency and fairness of the law enforcement system.

Comparative analysis and recommendations on communication policy

The conducted analysis of models of interaction between the state and society in the digital space of Kazakhstan, Singapore, and Malaysia reveals three distinct strategies for managing public perception of crime (Table 2), which allows for formulating recommendations to improve the communication policy of law enforcement agencies.

Table 2. Comparative analysis of models for managing public perception of crime

Parameter	Kazakhstan	Singapore	Malaysia
Core State Strategy	Reactive transparency: responding to public pressure, resulting in forced openness.	Proactive control: pre-emptive and centralised intervention to shape the official narrative.	Punitive ambiguity: employing laws with broad interpretation to deter criticism.
Key Legislative Instrument	Law "About Access to Information" as a basis for public demands.	POFMA, Act of Singapore No. 28.	Act of Malaysia No. 588, Sedition Act.
Primary Mechanism of Influence	Public resonance and pressure, amplified by live-streaming of court proceedings.	Correction Directions and other legal restrictions for content control.	Chilling effect arising from the risk of prosecution for online expression.
Public Trust Dynamics	Increasing: trust grew significantly after a period of radical transparency.	Managed and stable: a high level of trust is maintained through active state control.	Paradoxical and fragmented: high trust indicators coexist with criticism of systemic corruption.
Implications for Public Discourse	Activation and mobilisation of society, increased legal literacy.	Meticulously managed and restricted discourse, dominance of the official position.	Suppression of open dialogue, displacement of critical discussions to closed channels.

Source: compiled by the author based on this research

The comparison of these approaches demonstrated different regulatory philosophies. Thus, the Kazakhstani model of "reactive transparency" is characterised by the state responding to public pressure, amplified by social networks, which ultimately leads to increased public legitimacy through forced openness. In contrast, the Singaporean strategy of "proactive control" is pre-emptive and interventionist, whereby, through an elaborate legal architecture, the state actively shapes the information field to ensure a consistently high level of trust, albeit at the expense of the breadth of public dialogue. The Malaysian approach, in turn, can be characterised as a model of "punitive uncertainty", which relies on laws with ambiguous wording that create a "chilling effect" and suppress open criticism, potentially undermining long-term trust in the legal system. Based on this comparative analysis, a number of recommendations for the law enforcement agencies of Kazakhstan can be developed. Firstly, it is recommended to transition from reactive to proactive transparency by institutionalising the practice of openness through regular and prompt public informing on social networks, which will allow for occupying a dominant position in the information field. Secondly, it is necessary to develop a strategy for refuting misinformation, based on publishing official, detailed, and substantiated facts on the very platforms where false information is disseminated, with the aim of becoming the most reliable source of information, rather than merely a censor. Finally, it is important to invest in the population's digital legal literacy through the creation of educational online projects that explain citizens' rights and police procedures, which will contribute to a more objective perception of the law enforcement system's activities. The implementation of these recommendations will transform the forced transparency that arose situationally into a consistent state policy aimed at building long-term trust through dialogue, openness, and education.

Discussion

The identification of three distinct models of state strategy regarding the management of public perception of crime – "reactive transparency" in Kazakhstan, "proactive control" in Singapore, and "punitive uncertainty" in Malaysia – is the central finding of the presented work. These findings are significant because they demonstrate that in the era of total digitalisation, there is no universal approach to solving the problem of forming and maintaining trust in law enforcement institutions. The strategy chosen by the state has profound and long-term consequences for the nature of public discourse, the level of civil liberty, and the legitimacy of the authority itself. The subsequent discussion aims to interpret these three models within the context of broader international research concerning information

confrontation, the framing of public opinion, and the legal regulation of online space. The identified models confirm that information management has transformed into a key element of state policy. This thesis finds confirmation in the work of G. Markabaeva *et al.* (2021), where it was established that a country's image, increasingly shaped by social factors and their reflection in the media, is an important strategic resource influencing the economy and international relations. In the digital environment, where news about crime and justice spreads instantly, public perception of internal security becomes one of the key elements of this image. A persistent perception of a high level of crime or an unfair judicial system can directly impact the decisions of foreign investors and tourist flows, turning the management of online narratives into a matter of economic and political expediency. In this context, the aggressive and pre-emptive strategies of Singapore and Malaysia can be viewed as an attempt to protect this resource under conditions that L. Chen *et al.* (2022) characterised as information warfare. The research of these authors classifies the instruments used in such warfare, including bots, trolls, and manipulation, which are aimed at undermining trust and causing destabilisation. It is important to note that this "cyber weaponry" can be used not only by foreign states but also by domestic political opponents, criminal groups, or simply individual citizens, creating an asymmetric and difficult-to-predict threat landscape. Thus, the stringent legislation applied in Singapore and Malaysia can be interpreted as a defence mechanism aimed at creating a "digital wall" to protect the official narrative from external and internal information attacks.

Analysing the identified models through the lens of framing theory, developed by J. Mendelsohn *et al.* (2021), allows for a deeper understanding of their mechanisms of action. According to this theory, the way information is presented (the frame) determines its interpretation by the audience. The Singaporean model represents an example of rigid state control over frames, where the authorities, using the POFMA law, do not merely remove undesirable information but actively impose their own, "authoritative" frame for interpreting events, marginalising alternative viewpoints. This is a purposeful policy of narrative management. The Malaysian model, in turn, is aimed at suppressing undesirable frames through the use of laws with broad interpretation, which forces opponents to refrain from criticism. In contrast, the situation in Kazakhstan during the Bishimbayev case demonstrated the phenomenon of successful public reframing, where the narrative formed by society on social networks (the issue of systemic domestic violence) proved stronger than the initial, more restrained position of the state. This process fully corresponds to the model of social activism proposed by W. Tao *et al.* (2024), where the chain of "perception of injustice – motivation – overcoming stress – activism" explains how public outrage transformed into concrete political pressure and legislative changes. Emotional engagement, which J. Mendelsohn *et al.* (2021) identified as a key factor for the dissemination of frames related to human interests, in this case became the driving force. The case concerned not abstract political issues but the tragedy of a specific individual, which allowed for mobilising broad segments of the population. Social networks provided a platform for the collective experience of grief and anger, which became a powerful unifying factor and transformed individual emotions into collective political action.

The legislative approaches identified in Singapore and Malaysia illustrate the global dilemma between ensuring information security and protecting freedom of speech. As noted by D. Vese (2021) in an analysis of European practices, the fight against fake news often leads to the adoption of repressive laws that have a "chilling effect" on freedom of expression. The results of the analysis regarding Malaysia fully confirm this thesis, showing how the vagueness of legal norms leads to self-censorship. The Singaporean model, although more sophisticated, also raises similar concerns. The legitimate basis for such stringent state measures is often cited as the need to combat real threats, such as online hate, defined by S.A. Castaño-Pulgarín *et al.* (2021) as the systematic use of aggressive language against certain groups. However, as the analysis has shown, in practice, these laws are often used to suppress political criticism. This instrumentalisation of legislation creates a legitimacy deficit: when citizens see laws applied selectively, it undermines trust not only in the specific law but in the rule of law as a whole. The psychological impact of the "chilling effect" extends beyond the mere fear of persecution; it creates an atmosphere of social suspicion, where citizens begin to avoid any critical discussions, even in private conversations, fearing reports or misinterpretation. This atomises society and hinders the formation of a healthy public sphere where collective problems can be discussed and resolved. Thus, a vicious circle arises: the state, sensing a lack of trust, intensifies control, but this very intensification of control further erodes trust, creating the very instability that the authorities sought to prevent.

An additional aspect to the discussion is added by the research of R. Svensson & D. Oberwittler (2021), which found that the decrease in youth crime rates in Sweden is partly linked to a change in routine activities, namely – an increase in time spent online instead of unsupervised time spent on the streets. This finding creates a complex situation. The results of this study showed that in all three countries, a decrease in traditional types of crime is observed against the backdrop of rising cybercrime. It can be assumed that digitalisation, while creating new threats such as online fraud and disinformation, may simultaneously contribute to a reduction in "street" crime through changes in social practices. This global transformation of crime, as shown by the example of Nigeria by D.O. Okocha (2022), requires states to adopt not only repressive but also educational measures to improve the population's cyber hygiene. This confirms the conclusions of D. Caled & M.J. Silva (2022), who emphasise the necessity of interdisciplinary strategies to combat disinformation, combining governmental,

educational, and technological approaches. The changing nature of risks also affects their perception. As noted by R. Apel (2022), people's perceptions of risks and punishments are constantly updated based on experience transmitted through social networks. The rare, but physically dangerous, risk of street robbery is replaced by a constant, albeit less violent, risk of falling victim to online fraud. This new reality creates a diffuse sense of anxiety, which is difficult for law enforcement agencies to combat using traditional methods, as their work in cyberspace is less visible to the public. This widens the gap between official statistics showing a safer physical world and the subjective feeling of vulnerability among citizens in their daily digital lives.

Conclusions

This study has established that in the context of deep societal digitalisation, public perception of crime and trust in law enforcement institutions is determined not so much by official criminal statistics as by the state's chosen strategy for managing the information space. The analysis of practices in Kazakhstan, Singapore, and Malaysia has allowed for the identification and qualitative characterisation of three distinct models. The Kazakhstani model of "reactive transparency" demonstrated that forced openness, stimulated by public pressure through social networks, can paradoxically lead to a measurable increase in trust in the legal system – with quantitative indicators reaching up to +9.0 percentage points for certain institutions – and can stimulate progressive legislative reforms. In contrast, the Singaporean model of "proactive control" showed how, through an elaborate and stringent legal architecture, the state can effectively manage the public narrative, ensuring a consistently high level of trust and security; however, this is achieved at the expense of significantly limiting open dialogue and freedom of speech. The Malaysian model of "punitive uncertainty", which relies on laws with broad interpretation, creates a "chilling effect" that suppresses public criticism, but simultaneously forms a paradoxical public opinion and risks the accumulation of latent scepticism. The obtained results signify that the legitimacy of law enforcement agencies in the digital world depends on their ability to adapt communication strategies to societal expectations. The findings indicate that effective counteraction to disinformation requires a systemic approach based on transparent communication, public trust, and the development of citizens' critical thinking. On this basis, it is proposed to orient the activities of law enforcement agencies towards a consistent policy of openness and regular public informing, to enhance the level of digital literacy through educational initiatives, and to strengthen the role of official sources as the primary channel for reliable information.

It is important to note that this research has certain limitations. It was based on the analysis of three selected countries, which does not allow for the full extrapolation of the conclusions to the entire Southeast Asian region, characterised by significant political and cultural diversity. The analysis relied on publicly available reports, laws, and data, and did not cover the internal decision-making processes within state bodies, which remain non-transparent. Furthermore, the digital environment and public opinion are highly volatile; therefore, the results reflect the situation at a specific point in time and require constant updating. Consequently, the main directions for further research could include a quantitative longitudinal analysis of the long-term impact of transparency policy on the level of trust in Kazakhstan to verify the sustainability of the identified effect. A promising direction is the expansion of the comparative analysis to include democratic countries of the region and the conduction of qualitative research for a deeper understanding of public opinion under different levels of information control.

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Conflict of Interest

None.

References

[1] 04/10/2024. Part 1. Online broadcast of the trial of K. Bishimbaeva. (2024). Retrieved from https://www.youtube.com/live/yv30aie-nqQ?si=BWxFiWqb5vYdpMNP.

[2] Act of Malaysia No. 15 "Sedition Act 1948". (2006, January). Retrieved from https://www.icnl.org/wp-content/uploads/Malaysia_SeditionMalay.pdf.

[3] Act of Malaysia No. 588 "Communications and Multimedia Act 1998". (2006, January). Retrieved from https://www.vertic.org/media/National Legislation/Malaysia/MY_Communications_and_Multimedia_Act.pdf.

[4] Act of Malaysia No. 854 "Cyber Security Act 2024". (2024, June). Retrieved from https://www.nacsa.gov.my/act854.php.

[5] Act of Singapore "Public Order Act 2009". (2009, October). Retrieved from https://sso.agc.gov.sg/act/poa2009.

[6] Act of Singapore No. 28 "Foreign Interference (Countermeasures) Act". (2021, October). Retrieved from https://sso.agc.gov.sg/Act/FICA2021.

[7] Ahmad, N., Lilienthal, G., & Bin Asmad, A. (2023). The impact of social media on UK hate crime: A brief study. *Journal of Internet Social Networking & Virtual Communities*, article number 989773. doi: 10.5171/2023.989773.
[8] Akynbekova, A.B., Belgarayeva, A., & Kulsariyeva, A.T. (2024). Problems of identifying sources and visual content in social media: The experience of Kazakhstan. *Herald of Journalism*, 71(1), 13-22. doi: 10.26577/HJ.2024.v71.i1.2.
[9] Al-Zaman, M.S. (2021). Social media fake news in India. *Asian Journal for Public Opinion Research*, 9(1), 25-47. doi: 10.15206/ajpor.2021.9.1.25.
[10] Apel, R. (2022). Sanctions, perceptions, and crime. *Annual Review of Criminology*, 5(1), 205-227. doi: 10.1146/annurev-criminol-030920-112932.
[11] Broadcasting Act of the Republic of Singapore. (1994, October). Retrieved from https://sso.agc.gov.sg/Act/BA1994.
[12] Burkitbayeva, M. (2024). Crisis communication and public trust: Insights from social media use in Kazakhstan. *Bulletin of L.N. Gumilyov Eurasian National University. Journalism Series*, 148(3), 85-99. doi: 10.32523/2616-7174-2024-3-148-85-99.
[13] Caled, D., & Silva, M.J. (2022). Digital media and misinformation: An outlook on multidisciplinary strategies against manipulation. *Journal of Computational Social Science*, 5, 123-159. doi: 10.1007/s42001-021-00118-8.
[14] Castaño-Pulgarín, S.A., Suárez-Betancur, N., Vega, L.M.T., & López, H.M.H. (2021). Internet, social media and online hate speech. Systematic review. *Aggression and Violent Behavior*, 58, article number 101608. doi: 10.1016/j.avb.2021.101608.
[15] Chaparro, L.F., Pulido, C., Rudas, J., Victorino, J., Reyes, A.M., Estrada, C., Narvaez, L.A., & Gómez, F. (2021). Quantifying perception of security through social media and its relationship with crime. *IEEE Access*, 9, 139201-139213. doi: 10.1109/ACCESS.2021.3114675.
[16] Chen, L., Chen, J., & Xia, C. (2022). Social network behavior and public opinion manipulation. *Journal of Information Security and Applications*, 64, article number 103060. doi: 10.1016/j.jisa.2021.103060.
[17] Gritsenko, D., Trochev, A., & Vehkalahti, K. (2025). Public perception of algorithmic policing in a non-democratic context: Evidence from Kazakhstan. *Policing and Society*, 35(10), 1357-1376. doi: 10.1080/10439463.2025.2489954.
[18] Ibrayeva, G., & Nurshaikhova, A. (2024). Emotional dynamic and opinion cumulation on social networks in Kazakhstan. In A. Coman & S. Vasilache (Eds.), *International conference on human-computer interaction* (pp. 95-106). Cham: Springer. doi: 10.1007/978-3-031-61312-8_7.
[19] Ibrayeva, G., Tleugazina, D., & Ramazan, A. (2025). Social networks as a driving force for legal change: Emotional interaction and the impact of court broadcasts in Kazakhstan. In A. Coman & S. Vasilache (Eds.), *International conference on human-computer interaction* (pp. 257-271). Cham: Springer. doi: 10.1007/978-3-031-93536-7_18.
[20] Issuance of POFMA correction direction to the online citizen for false statements concerning the death penalty in Singapore. (2024). Retrieved from https://www.mha.gov.sg/media-room/newsroom/issuance-of-pofma-correction-direction-to-the-online-citizen-for-false-statements-concerning-the-death-penalty-in-singapore/.
[21] Kemp, S. (2025a). *Digital 2025: Kazakhstan*. Retrieved from https://datareportal-com.translate.goog/reports/digital-2025-kazakhstan?_x_tr_sl=en&_x_tr_tl=uk&_x_tr_hl=uk&_x_tr_pto=sc.
[22] Kemp, S. (2025b). *Digital 2025: Malaysia*. Retrieved from https://datareportal.com/reports/digital-2025-malaysia.
[23] Kemp, S. (2025c). *Digital 2025: Singapore*. Retrieved from https://datareportal.com/reports/digital-2025-singapore.
[24] Khamzin, A., Buribayev, Y., & Sartayeva, K. (2022). Prevention of human trafficking crime: A view from Kazakhstan and Central Asian countries. *International Journal of Criminal Justice Sciences*, 17(1), 34-53. doi: 10.5281/zenodo.4756088/IJCJS.
[25] Koh, H., & Baek, K. (2023). The differential impact of traditional and social media on public confidence: The case of Kazakhstan. *Demokratizatsiya: The Journal of Post-Soviet Democratization*, 31(1), 91-112.
[26] Law of Kazakhstan No. 401-V ZRK "About Access to Information". (2015, November). Retrieved from https://adilet.zan.kz/rus/docs/Z1500000401/z150401.htm.
[27] Law of the Republic of Kazakhstan No. 72-VIII "On Amendments and Additions to Certain Legislative Acts of the Republic of Kazakhstan Concerning the Protection of Women's Rights and Child Safety". (2024, April). Retrieved from https://adilet.zan.kz/rus/docs/Z2400000072.
[28] Loheswar, R. (2024). *Ipsos report: Malaysians show rising confidence in cops, two-thirds believe officers treat everyone equally*. Retrieved from https://malaysia.news.yahoo.com/ipsos-report-malaysians-show-rising-063722857.html.
[29] Malaysia Events of 2024. (2024). Retrieved from https://www.hrw.org/world-report/2025/country-chapters/malaysia.
[30] Markabaeva, G., Zhusupova, A., & Sultanbaeva, G. (2021). The role of social information in the formation of the country's image: A comparative analysis (on the example of Kazakhstan, Russia and Japan). *Bulletin of L.N. Gumilyov Eurasian National University. Journalism Series*, 135(2), 20-26.
[31] Mendelsohn, J., Budak, C., & Jurgens, D. (2021). Modeling framing in immigration discourse on social media. *Arxiv*. doi: 10.48550/arXiv.2104.06443.

[32] Näsi, M., Tanskanen, M., Kivivuori, J., Haara, P., & Reunanen, E. (2021). Crime news consumption and fear of violence: The role of traditional media, social media, and alternative information sources. *Crime & Delinquency*, 67(4), 574-600. doi: 10.1177/0011128720922539.
[33] Nussipova, A.U., & Slanbekova, G.K. (2024). Social media landscape in the republic of Kazakhstan: Navigating youth behaviour and ensuring information security. *Journal of Philosophy, Culture & Political Science*, 89(3), 68-78. doi: 10.26577/jpcp.2024.v89-i3-07.
[34] Okocha, D.O. (2022). Online social networks misuse, cyber-crimes and counter-mechanisms in Nigeria. *University of Nigeria Interdisciplinary Journal of Communication Studies*, 28(1), 62-74.
[35] On public confidence in law enforcement agencies and the judicial system (April-May 2023). (2023). Retrieved from https://stat.gov.kz/ru/industries/social-statistics/stat-crime/publications/70710/.
[36] Overview of Safety and Security Situation in 2024. (2025). Retrieved from https://www.mha.gov.sg/media-room/newsroom/overview-of-safety-and-security-situation-in-2024/.
[37] Penal Code of the Republic of Kazakhstan No. 226-V. (2014, July). Retrieved from https://adilet.zan.kz/rus/docs/K1400000226.
[38] Prosecutor General's Office of Kazakhstan. (n.d.). Retrieved from https://t.me/GenPr/8609.
[39] Protection from Online Falsehoods and Manipulation Act. (n.d.). Retrieved from https://www.pofmaoffice.gov.sg/regulations/protection-from-online-falsehoods-and-manipulation-act/.
[40] Public confidence in law enforcement agencies and the judicial system (October-November 2024). (2025). Retrieved from https://stat.gov.kz/ru/industries/social-statistics/stat-crime/publications/296594/.
[41] Serikpaev, D. (2024). *The court hearings of former minister Bishimbayev will be broadcast online*. Retrieved from https://forbes.kz/articles/sudebnyie_zasedaniya_nad_eks-ministrom_bishimbaevyim_budut_translirovat_onlayn.
[42] Sharipova, D., & Beissembayev, S. (2023). Causes of violent extremism in Central Asia: The case of Kazakhstan. *Studies in Conflict & Terrorism*, 46(9), 1702-1724. doi: 10.1080/1057610X.2021.1872163.
[43] Singapore 2024. (n.d.). *Amnesty international*. Retrieved from https://www.amnesty.org/en/location/asia-and-the-pacific/south-east-asia-and-the-pacific/singapore/report-singapore/.
[44] Statistics of crime. (n.d.). *Bureau of national statistics of the agency for strategic planning and reforms of the Republic of Kazakhstan*. Retrieved from https://stat.gov.kz/en/industries/social-statistics/stat-crime/.
[45] Ștefăniță, O., & Buf, D.M. (2021). Hate speech in social media and its effects on the LGBT community: A review of the current research. *Romanian Journal of Communication and Public Relations*, 23(1), 47-55. doi: 10.21018/rjcpr.2021.1.322.
[46] Sultanbayeva, G., Akynbekova, A., Belgarayeva, A., Buyenbayeva, Z., & Ashimova, A. (2024). Digital literacy as a tool for identifying fake news: A comparative analysis using the example of European and Kazakh media. *Journal of Information Policy*, 15, 1-30. doi: 10.5325/jinfopoli.15.2025.0001.
[47] Svensson, R., & Oberwittler, D. (2021). Changing routine activities and the decline of youth crime: A repeated cross-sectional analysis of self-reported delinquency in Sweden, 1999-2017. *Criminology*, 59(2), 351-386. doi: 10.1111/1745-9125.12273.
[48] Sydorzhevskyi, M. (2024). *In Kazakhstan, a former minister was convicted of murdering his wife*. Retrieved from https://www.dw.com/uk/u-kazahstani-eksministra-zasudili-do-24-rokiv-vaznici-za-vbivstvo-druzini/a-69067167.
[49] Tao, W., Li, J.Y., Lee, Y., & He, M. (2024). Individual and collective coping with racial discrimination: What drives social media activism among Asian Americans during the COVID-19 outbreak. *New Media & Society*, 26(6), 3168-3187. doi: 10.1177/14614448221100835.
[50] Transformative Justice Collective. (n.d.). Retrieved from https://transformativejusticecollective.org/.
[51] U.S. Department of State. (n.d.). *Bureau of international narcotics and law enforcement affairs: Kazakhstan summary*. Retrieved from https://2021-2025.state.gov/bureau-of-international-narcotics-and-law-enforcement-affairs-work-by-country/kazakhstan-summary/.
[52] Vese, D. (2021). Governing fake news: The regulation of social media and the right to freedom of expression in the era of emergency. *European Journal of Risk Regulation*, 13(3), 477-513. doi: 10.1017/err.2021.48.