

# SAM RAINSY

## Summary

Former Cambodia National Rescue Party (CNRP) President Sam Rainsy was the target of six lawsuits from 2004 to 2013:

- Two defamation lawsuits filed by Prime Minister Hun Sen and Prince Ranariddh in 2004, for which he was convicted in 2005;
- A defamation and disinformation suit filed by Foreign Minister Hor Namhong in 2008, for which he was convicted in 2011 and sentenced to two years in prison;
- A defamation suit filed by Prime Minister Hun Sen in February 2009, for which he was convicted and forced to pay a fine a month later;
- An incitement to discrimination and destruction of property suit filed in November 2009, for which he was convicted and sentenced to two years in prison; and
- A disinformation and forgery of public document suit filed in March 2010, for which he was convicted and sentenced to ten years in prison.

Despite a royal pardon in 2013, on 13 November 2015, the Phnom Penh Municipal Court issued an arrest warrant for Sam Rainsy over the 2008 defamation case filed by Foreign Minister Hor Namhong. He was subsequently stripped of his National Assembly seat and has been in exile since.

In addition to the revived 2008 defamation case, Sam Rainsy has been charged in seven new cases since August 2015:

- As an accomplice to forging public documents, using forged public documents, and incitement to commit a felony (Articles 29, 629, 630, and 495 of the Criminal Code) in the case against SRP Senator Hong Sok Hour in August 2015, for which he was convicted and sentenced to five years in prison on 27 December 2016;
- With defamation (Article 305 of the Criminal Code) in a case filed by National Assembly President Heng Samrin in November 2015, for which he was convicted and fined 37,500 USD on 28 July 2016;
- With defamation (Article 305 of the Criminal Code) in a case filed by CPP website administrator Som Soeun in March 2016, for which he was convicted and fined 6,250 USD on 8 November 2016;
- With defamation and incitement to commit a felony (Articles 305 and 495 of the Criminal Code) in a case filed by Prime Minister Hun Sen in August 2016;
- With incitement to commit a felony (Article 495 of the Criminal Code) filed by Prime Minister Hun Sen in September 2016; and
- In two separate but related defamation cases (Article 305 of the Criminal Code) filed in January 2017, one by Prime Minister Hun Sen and one by former CNRP youth activist Thy Sovantha.

Sam Rainsy now faces seven years in prison for the existing convictions if he returns to Cambodia and could face up to an additional four years if convicted of all charges and sentenced to the maximum jail time permitted under the law. He was officially exiled by the Cambodian government in mid-October 2016.

## Charges

### Criminal Code, Article 29: Definition of accomplice

An accomplice shall be any person who knowingly, by aiding or abetting, facilitates an attempt to commit a felony or a misdemeanor, or its commission. An accomplice may only be punishable if the felony or misdemeanor was committed or attempted. An accomplice to a felony or a misdemeanor shall incur the same penalties as the perpetrator.

### Criminal Code, Article 629: Forgery of Public Documents

Any forgery committed in an authentic document or in any document issued by a public administration to confirm a right, an identity or a status, or to grant an authorization is punishable by an imprisonment from 5 (five) years to 10 (ten) years.

### Criminal Code, Article 630: Use of Forged Public Documents

The use of forged public documents as defined in Article 629 (Forgery of Public Documents) is punishable by an imprisonment from 2 (two) years to 5 (five) years and a fine from 4,000,000 (four million) riels to 10,000,000 (ten million) riels.

### Criminal Code, Article 494: Conditions for Existence of Incitement

For the purpose of enforcement of the present Chapter, the incitement is punishable when it is committed:

- by speech of any kind, made in a public place or meeting;
- by writing or picture of any kind, either displayed or distributed to the public;
- by any audio-visual communication to the public.

### Criminal Code, Article 495: Incitement to commit a felony

The direct incitement to commit a felony or to disturb social security by employing one of the means specified in Article 494 (existence of incitement) of this Code shall be punishable by imprisonment from six months to two years and a fine from one million to four million Riels, where the incitement was ineffective.

### Criminal Code, Article 305: Definition of defamation

"Defamation" shall mean any allegation or charge made in bad faith which tends to injure the honor or reputation of a person or an institution. Defamation shall be punishable by a fine from one hundred thousand to ten million Riels if it is committed by any of the following means:

- Any words whatsoever uttered in a public place or in a public meeting;
- Written documents or pictures of any type released or displayed to the public;
- Any audio-visual communication intended for the public.

## 2004

**January** – Prime Minister Hun Sen files a defamation lawsuit against Sam Rainsy after the latter accuses the Prime Minister of being behind the 22 January killing of union leader Chea Vichea.<sup>1</sup>

**2 February** – Sam Rainsy files a countersuit accusing Prime Minister Hun Sen of being behind the 1997 grenade attack.<sup>2</sup>

**19 August** – Sam Rainsy is summoned for questioning over the lawsuit filed by Prime Minister Hun Sen.<sup>3</sup>

**7 September** – Sam Rainsy files a lawsuit against Prime Minister Hun Sen and Funcinpec leader Prince Norodom Ranariddh, accusing them of having plotted his death.<sup>4</sup>

**18 October** – National Assembly President Prince Norodom Ranariddh and senior CPP MP Cheam Yeap say that more than 60 parliamentarians signed a petition asking that Sam Rainsy be prosecuted on a charge of disinformation that accelerated King Norodom Sihanouk's decision to abdicate. The charges are based on a letter dated 6 October from Sam Rainsy to King Sihanouk, warning him of staged anti-monarchy protests planned for his scheduled return in October.<sup>5</sup>

**3 November** – Sam Rainsy appeals to lawmakers around the world for support after the CPP and Funcinpec "join hands" to remove his parliamentary immunity, which Rainsy claims will likely be the "first step prior to my ... prosecution before a politically subservient tribunal."<sup>6</sup>

**5 November** – Sam Rainsy is summoned to court for questioning over defamation charges filed against him by Funcinpec leader Prince Norodom Ranariddh over allegations Sam Rainsy had made that Ranariddh had received 30 million USD from Hun Sen to accept the formation of a coalition government.<sup>7</sup>

## 2005

**3 February** – The National Assembly votes to lift Sam Rainsy's parliamentary immunity, as well as that of SRP lawmakers Cheam Channy and Chea Poch. Sam Rainsy leaves the country to go on self-imposed exile, while Chea Poch goes into hiding. Cheam Channy is arrested that night, brought to military court for questioning, detained at the National Military Police headquarters for two nights, and later transferred to the military prison in Phnom Penh; he was ultimately charged with organized crime and fraud by the military court.<sup>8</sup>

**22 December** – Sam Rainsy is convicted in absentia in two separate defamation lawsuits – one filed by Prince Ranariddh and one filed by Prime Minister Hun Sen – and sentenced to 18 months in prison and fined 14,000 USD. The case filed by Prince Ranariddh was in relation to comments Sam Rainsy had made on Beehive Radio alleging that the Coalition had accepted 30 million USD and a plane from Prime Minister Hun Sen for accepting the coalition government in 2004. The case filed by Prime Minister Hun Sen was in relation to Sam Rainsy filing his own suit against the Prime Minister alleging the latter was behind the 1997 grenade attack.<sup>9</sup>

## 2006

**5 February** – King Norodom Sihanouk grants Sam Rainsy a royal pardon at the request of Prime Minister Hun Sen, after Sam Rainsy sends a letter to the Prime Minister expressing regret for his "defamatory" comments and promising to drop his own lawsuit against the Prime Minister in the United States in relation to the 1997 grenade attack.<sup>10</sup>

**10 February** – Sam Rainsy returns to Cambodia after one year in exile.<sup>11</sup>

## 2008

**17 April** – Sam Rainsy accuses Foreign Minister Hor Namhong of having ran Boeung Trabek prison during the Khmer Rouge regime, during a commemoration at the Killing Fields.<sup>12</sup>

**22 April** – Foreign Minister Hor Namhong files a defamation lawsuit against Sam Rainsy at the Phnom Penh Municipal Court.<sup>13</sup>

**May** – The Phnom Penh Municipal Court summons Sam Rainsy to appear for questioning, but Foreign Minister Hor Namhong shelves the case, awaiting the verdict from a case filed in French court over comments made by Sam Rainsy in his recently published autobiography.<sup>14</sup>

**8 June** – Dam Sith, editor-in-chief of the opposition-aligned Moneaksekar Khmer newspaper, is arrested and charged with defamation and disinformation over an 18 April article that quoted Sam Rainsy's comments during the Khmer Rouge genocide commemoration.<sup>15</sup>

**15 June** – Dam Sith, editor-in-chief of the opposition-aligned Moneaksekar Khmer newspaper, is released after Prime Minister Hun Sen calls for his release as a result of international pressure.<sup>16</sup>

**16 June** – National Assembly President Heng Samrin is asked by the court to "temporarily suspend the immunity of Sam Rainsy" to pave the way for an investigation into the accusation of defamation leveled by Foreign Minister Hor Namhong.<sup>17</sup>

**20 June** – European Union election observers are assured by Foreign Minister Hor Namhong that Sam Rainsy's parliamentary immunity would not be stripped before the July elections.<sup>18</sup>

**11 July** – Sam Rainsy hands over evidence to the court allegedly implicating Foreign Minister Hor Namhong in Khmer Rouge atrocities.<sup>19</sup>

**December** – A French court hears arguments in the defamation case filed by Foreign Minister Hor Namhong against Sam Rainsy.<sup>20</sup>

## 2009

**27 January** – The Tribunal Correctionnel in Paris fines Sam Rainsy 1 euro for defamation and orders his publisher to remove the offending passage in two versions of his autobiography. The court also orders Sam Rainsy and his publisher to post notices in two newspapers of their choice about the court ruling and to pay 5,500 euros (7,272 USD) in legal fees to the state.<sup>21</sup>

**26 February** – Sam Rainsy's parliamentary immunity is lifted in order to force him to pay a fine leveled against him by the National Election Commission after Prime Minister Hun Sen filed a criminal defamation suit; the decision was made by the Standing Committee of the National Assembly at the request of Minister of Justice Hang Vong Ratana, during a National Assembly session. In response, Sam Rainsy argues he has not lost his immunity because the decision still needs to be made by the National Assembly during a plenary session.<sup>22</sup>

**5 March** – National Assembly President Heng Samrin says he will convene the Standing Committee the following week in order to restore Sam Rainsy's parliamentary immunity, as Sam Rainsy paid the 2,500 USD fine to the National Election Committee on 27 February.<sup>23</sup>

**10 March** – Sam Rainsy's parliamentary immunity is restored.<sup>24</sup>

**8 October** – Sam Rainsy is ordered to appear before the French Appeals Court in connection with the defamation suit filed by Foreign Minister Hor Namhong.<sup>25</sup>

**25 October** – Sam Rainsy travels to Svay Rieng province and joins villagers in uprooting wooden markers (border post #185) on the newly-delineated border with Vietnam after hearing complaints by villagers that Vietnamese authorities had placed the markers on their land.<sup>26</sup>

**28 October** – The prosecutor of the Svay Rieng Provincial Court submits a request to the Minister of Justice to have Sam Rainsy's parliamentary immunity lifted, which is then forwarded to the Speaker of the National Assembly on the same day.<sup>27</sup>

**November** – Sam Rainsy goes into self-imposed exile in France after being investigated in relation to the uprooting of border posts in Svay Rieng province.<sup>28</sup>

**12 November** – The Standing Committee of the National Assembly decides to submit the matter of lifting Sam Rainsy's parliamentary immunity for "consideration and adoption"; on the same day, 64 MPs request a closed-door session for the vote.<sup>29</sup>

**16 November** – Sam Rainsy is stripped of his parliamentary immunity by the National Assembly during a closed-door session, in a vote boycotted by opposition MPs; all 87 lawmakers present vote in favor.<sup>30</sup>

**23 November** – Sam Rainsy is charged by the Svay Rieng Provincial Court prosecutor with incitement to discrimination and wrongful damage to property under Articles 61 and 52, respectively, of the UNTAC Code.<sup>31</sup>

**17 December** – Sam Rainsy is summoned to appear at the Svay Rieng Provincial Court for questioning in connection with the 25 October case.<sup>32</sup>

**28 December** – The Svay Rieng Provincial Court denies a request to delay hearings against Sam Rainsy related to the 25 October case.<sup>33</sup>

**31 December** – The Svay Rieng Provincial Court issues an arrest warrant for Sam Rainsy related to the 25 October case.<sup>34</sup>

## 2010

**10 January** – The Svay Rieng Provincial Court summons Sam Rainsy to appear in court on 27 January to face the charges.<sup>35</sup>

**27 January** – Sam Rainsy (along with two villagers, Meas Srey and Prom Chea) is found guilty of incitement to discrimination and wrongful damage to property by the Svay Rieng Provincial Court; he is sentenced to two years in prison and fined 1,927 USD in compensation to district authorities.<sup>36</sup>

**15 February** – Sam Rainsy disseminates maps during a video press conference to SRP supporters which purports to show "unprecedented evidence" of Vietnamese border incursions and supposedly shows that border posts in Svay Rieng province had been moved up to 500 meters inside Cambodia.<sup>37</sup>

**22 February** – Chief border negotiator Var Kimhong threatens Sam Rainsy with charges of falsifying public documents in connection with the 15 February dissemination of maps.<sup>38</sup>

**24 February** – Prime Minister Hun Sen accuses Sam Rainsy of falsifying public documents and says he will not allow him to return for the 2013 National Assembly elections.<sup>39</sup>

**26 February** – Government lawyer Ky Tech files a criminal complaint against Sam Rainsy on charges of spreading disinformation and disseminating false documents in relation to the maps and video from 15 February.<sup>40</sup>

**3 March** – Sam Rainsy is summoned to appear in court on 9 March for questioning in relation to the 15 February video.<sup>41</sup>

**9 March** – The Phnom Penh Court of First Instance rejects a request by defense lawyers to delay the questioning.<sup>42</sup>

**14 March** – Sam Rainsy is formally charged with forgery of a public document (Article 49 of UNTAC Code) and disinformation (Article 62 of UNTAC Code) by the Phnom Penh Court of First Instance, which had opened an investigation on 11 March.<sup>43</sup>

**5 April** – The Phnom Penh Court of First Instance summons Sam Rainsy to appear on 20 April for questioning.<sup>44</sup>

**20 April** – Sam Rainsy's lawyer asks the Phnom Penh Court of First Instance to form a committee to investigate the placement of border posts in the area in question. On 28 April, the defense argues that the committee has to be established if Sam Rainsy is to be prosecuted on disinformation charges.<sup>45</sup>

**19 May** – The Court rejects the request by Sam Rainsy's defense to form the committee (upheld on Appeal on 8 June).<sup>46</sup>

**9 September** – New summons are issued for Sam Rainsy to appear for questioning over the comments made about Foreign Minister Hor Namhong in 2008.<sup>47</sup>

**23 September** – Sam Rainsy is found guilty in absentia of forging public documents and disinformation, and sentenced to 10 years in prison and fined 14,000 USD.<sup>48</sup>

**13 October** – The Court of Appeal upholds the conviction related to the 25 October charges.<sup>49</sup>

## 2011

**5 April** – The Phnom Penh Municipal Court holds a hearing in the defamation case against Sam Rainsy filed by Foreign Minister Hor Namhong.<sup>50</sup>

**25 April** – Sam Rainsy is found guilty in absentia on charges of defamation and inciting discrimination in relation to the comments made against Foreign Minister Hor Namhong in 2008, and sentenced to two years in prison.<sup>51</sup>

**22 September** – Sam Rainsy's lawyer asks the Court of Appeal to overturn the defamation and disinformation conviction related to the comments against Foreign Minister Hor Namhong in 2008.<sup>52</sup>

## 2012

**16 June** – Kem Sokha's Human Rights Party (HRP) and Sam Rainsy's Sam Rainsy Party (SRP) announce plans to merge into a single party, the Cambodia National Rescue Party (CNRP).<sup>54</sup>

## 2013

**13 March** – Sam Rainsy asks his lawyer to drop the request of the 2011 conviction on charges of defamation and disinformation related to comments made about Foreign Minister Hor Namhong in 2008.<sup>54</sup>

**12 July** – King Norodom Sihanouk grants a royal pardon to Sam Rainsy at the request of Prime Minister Hun Sen, allowing Sam Rainsy to return to Cambodia ahead of the 28 July national elections.<sup>56</sup>

**19 July** – Sam Rainsy returns to Cambodia less than ten days before the national elections.<sup>57</sup>

**28 July** – The CNRP wins 55 of the National Assembly seats during the national elections.<sup>57</sup>

## 2014

**22 July** – The CNRP and the ruling CPP sign an agreement, bringing to an end a yearlong political deadlock.<sup>58</sup>

**25 July** – The National Election Committee (NEC) accepts Sam Rainsy as a lawmaker, followed by a statement by the National Assembly that he will be confirmed as a legislator the following week.<sup>59</sup>

## 2015

**15 August** – Sam Rainsy is charged as an accomplice to forging public document, using forced public documents, and incitement to commit a felony in relation to the case against SRP Senator Hong Sok Hour.<sup>60</sup>

**29 October** – Sam Rainsy apologizes via SMS to Prime Minister Hun Sen after accusing him three days earlier of using "fascist methods" and "behind the beating of two opposition MPs outside of the National Assembly."<sup>61</sup>

**12 November** – Prime Minister Hun Sen called Sam Rainsy the "son of a traitor" on videos and text posted on Facebook.<sup>62</sup>

**13 November** – The Phnom Penh Municipal Court issues an arrest warrant for Sam Rainsy, in relation to the defamation case filed by Foreign Minister Hor Namhong; government spokesman Philip Shyng says the 2013 royal pardon did not cover that case, nor did Sam Rainsy's parliamentary immunity cover him at the time of the offence.<sup>63</sup>

**16 November** – The National Assembly strips Sam Rainsy of his status as a lawmaker and his parliamentary immunity. A statement issued by National Assembly President Heng Samrin cites the Cambodian Constitution, provision 83 of the National Assembly's internal regulations, and Article 139 of the Law on the Election of Members of the National Assembly (LEMNA) as justifications for the decision.<sup>64</sup>

**19 November** – Sam Rainsy repeats allegations that Foreign Minister Hor Namhong was responsible for collaborating with Khmer Rouge officials at the Boeung Trabek prison camp.<sup>65</sup>

**20 November** – National Assembly President Heng Samrin files a defamation suit against Sam Rainsy over comments the latter made alleging Heng Samrin's regime had sentenced former King Sihanouk to death in the 1980s.<sup>66</sup>

**1 December** – An arrest warrant is issued for Sathya Sambath, Sam Rainsy's Facebook administrator, alleging that he is responsible for producing the video posted to Sam Rainsy's Facebook page by SRP Senator Hong Sok Hour featuring a fake version of the Cambodia-Vietnam border treaty.<sup>67</sup>

## 2016

**29 January** – Foreign Minister Hor Namhong files a case with the Superior Court of Paris centering on a post to Sam Rainsy's Facebook page in which he asked the Foreign Minister to "apologize to the souls and families of the victims who got killed by the Khmer Rouge at the Boeung Trabek in the last 1970s [sic]" and accused him of being involved in the killings.<sup>68</sup>

**18 March** – The Phnom Penh Municipal Court issues summons for Sam Rainsy to appear for questioning on 23 March in a new court case related to a complaint filed on 10 March by CPP website administrator Som Soeun over a Facebook post in which Sam Rainsy accused Som Soeun of being involved in a plan to boost Hun Sen's Facebook popularity by hiring people in India and the Philippines to "like" the page.<sup>69</sup>

**11 July** – The case filed by Foreign Minister Hor Namhong against Sam Rainsy before the Superior Court of Paris on 29 January is dismissed on technicalities.<sup>70</sup>

**28 July** – Sam Rainsy is convicted of defamation against National Assembly President Heng Samrin in the case filed on 20 November 2015 and fined 37,500 USD in compensation to Heng Samrin.<sup>71</sup>

**28 July** – Investigative Judge Kor Vandy writes a letter stating that the case against Sam Rainsy and two of his assistants – Un Chung Lean and Sathya Sambath – in relation to the forgery case against SRP Senator Hong Sok Hour will go to trial.<sup>72</sup>

**1 August** – Prime Minister Hun Sen files a court complaint against Sam Rainsy for defamation and incitement for saying the government was behind the killing of Kem Ley and for "inciting the public."<sup>73</sup>

**11 September** – Sam Rainsy addresses CNRP youth activists via Skype and asks whether they were ready to join a "mass demonstration."<sup>74</sup>

**6 October** – Phnom Penh deputy prosecutor Sieng Sok sends a letter detailing a new case leveled against Sam Rainsy on 23 September, alleging he committed "incitement" and caused "social turmoil" on 11 September, resulting in new summons issued for Sam Rainsy to appear in court on 11 October to face questioning.<sup>75</sup>

**12 October** – The Council of Ministers issues a directive banning all airlines from selling tickets to Sam Rainsy, saying that planes would be turned around if Sam Rainsy was onboard, and banning Sam Rainsy from entering Cambodia through other ways – making his exile official.<sup>76</sup>

**17 October** – A court hearing over a defamation case filed by CPP website administrator Som Soeun is postponed by the court after a representative of Som Soeun's lawyer asked for a postponement.<sup>77</sup>

**8 November** – Sam Rainsy is found guilty on charges of defamation over the Facebook "likes" case and ordered to a 10 million riels (2,500 USD) fine and 15 million riels (3,750 USD) in compensation.<sup>78</sup>

**27 December** – Sam Rainsy is convicted of the forgery and incitement charges in relation to the case against SRP Senator Hong Sok Hour and sentenced to five years in prison.<sup>79</sup>

## 2017

**17 January** – Former CNRP youth activist Thy Sovantha files a defamation suit against Sam Rainsy in relation to comments he made regarding rumors that Prime Minister Hun Sen had given 1 million USD to Thy Sovantha.<sup>80</sup>

**18 January** – Prime Minister Hun Sen files a defamation suit against Sam Rainsy in relation to comments he made regarding rumors that the Prime Minister had paid 1 million USD to former CNRP youth activist Thy Sovantha.<sup>81</sup>

**11 February** – Sam Rainsy resigns as President of the CNRP in anticipation of the passage of controversial amendments to the Law on Political Parties by the National Assembly.<sup>82</sup>

Updated: March 2017

<sup>1</sup> Cambodia Daily, "Sam Rainsy To Take Hun Sen Lawsuit to Court," 11 March 2004, <https://www.cambodiadaily.com/archives/sam-rainsy-to-take-hun-sen-lawsuit-to-court-13855/>.

<sup>2</sup> Ibid.

<sup>3</sup> Cambodia Daily, "Sam Rainsy Summoned Over Defamation Suit," 23 August 2004, <https://www.cambodiadaily.com/archives/sam-rainsy-summoned-over-defamation-suit-14245/>.

<sup>4</sup> Cambodia Daily, "Sam Rainsy Sues PM, Ranariddh Again," 8 September 2004, <https://www.cambodiadaily.com/archives/sam-rainsy-sues-pm-ranariddh-again-14270/>.

<sup>5</sup> BIC, "Cambodia PM Sues Sam Rainsy's Prosecution," 19 October 2004, <https://www.cambodiadaily.com/archives/60-mps-demand-sam-rainsy-prosecution-43380/>.

<sup>6</sup> Cambodia Daily, "Sam Rainsy Appeals to Foreign Lawmakers," 4 November 2004, <https://www.cambodiadaily.com/archives/sam-rainsy-appeals-to-foreign-lawmakers-43955/>.

<sup>7</sup> Phnom Penh Post, "2004 year in review," 31 December 2004, <http://www.phnompenhpost.com/national/2004-year-review>.

<sup>8</sup> Human Rights Watch, "Cambodia: Opposition Politicians Arrested, Forced to Flee," 6 February 2005, <https://www.hrw.org/legacy/nr/alerts/2005/02/07/cambodia0193101>.

<sup>9</sup> Cambodia Daily, "Sam Rainsy Sentenced to 18 Months," 23 December 2005, <https://www.cambodiadaily.com/archives/sam-rainsy-sentenced-to-18-months-1069/>.

<sup>10</sup> LICADHO, Human Rights in Cambodia: The Charade of Justice (December 2007), <https://www.licadho-cambodia.org/rapports/flex/07131-CADHO-report-charade-justice-07.pdf>.

<sup>11</sup> Ibid.

<sup>12</sup> Cambodia Daily, "Minister Plans To Sue Sam Rainsy for Khmer Rouge Link Comments," 23 April 2008, <https://www.cambodiadaily.com/archives/minister-plans-to-sue-sam-rainsy-for-khmer-rouge-link-comments-8177/>.

<sup>13</sup> BIC, "Foreign Minister Files Suit Against FIM," 22 December 2008, <http://khmernews.blogspot.com/2008/04/foreign-minister-files-suit-against-fim.html>.

<sup>14</sup> Phnom Penh Post, "Defamation suit drags on," 16 December 2008, <http://www.phnompenhpost.com/national/defamation-suit-drags-on>.

<sup>15</sup> Phnom Penh Post, "Opposition newspaper editor freed from jail pending defamation trial," 16 June 2008, <http://www.phnompenhpost.com/national/opposition-newspaper-editor-freed-jail-pending-defamation-trial>.

<sup>16</sup> Ibid.

<sup>17</sup> Phnom Penh Post, "Court asks National Assembly to strip Sam Rainsy of parliamentary immunity," 18 June 2008, <http://www.phnompenhpost.com/national/court-asks-national-assembly-to-strip-sam-rainsy-parliamentary-immunity>.

<sup>18</sup> Phnom Penh Post, "Rainsy's immunity assured until after election," 26 June 2008, <http://www.phnompenhpost.com/national/rainsy-immunity-assured-until-after-election>.

<sup>19</sup> Phnom Penh Post, "Sam Rainsy presses case against FIM," 11 July 2008, <http://www.phnompenhpost.com/national/sam-rainsy-presses-case-against-fim>.

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