

CRITICISM OF THE IMPLEMENTATION OF ARTICLE 27 PARAGRAPH (3) OF THE ITE LAW: BETWEEN LEGAL PROTECTION AND CRIMINALIZATION OF EXPRESSION

Samsir

Universitas Ibnu Chaldun Jakarta, Indonesia

E-mail: syamsir.fkm@gmail.com

Abstract

Article 27 paragraph (3) of the Information and Electronic Transactions Law (UU ITE) in Indonesia has become the subject of controversy because it is often used to ensnare individuals who express criticism or opinions in the digital space. This research aims to examine the application of this article through a literature review approach to evaluate the balance between legal protection for individuals and the potential criminalization of freedom of expression. By analyzing statutory regulations, case studies, as well as the views of academics and legal practitioners, this research found that the ambiguity of legal norms in this article opens up space for multiple interpretations that have the potential for misuse. Many cases show that this article is more often used to silence criticism than to protect the public from actual defamation. The legal implications of these findings indicate an urgent need to revise Article 27 paragraph (3) of the ITE Law so that it no longer becomes a tool for criminalizing expression in the digital era. Some recommendations include affirming clearer legal boundaries, applying the principle of *ultimum remedium*, and prioritizing civil settlement mechanisms or the right to reply before entering the criminal realm. Thus, it is hoped that this policy revision can create a balance between legal protection for individuals and respect for the right to freedom of expression, which is a fundamental principle in democracy.

Keywords: ITE Law, Article 27 paragraph (3), freedom of expression, criminalization, legal protection.

INTRODUCTION

Freedom of expression is one of the main pillars of a modern democratic system. This right is guaranteed in various national and international legal instruments, such as Article 28E paragraph (3) of the 1945 Constitution and Article 19 of the Universal Declaration of Human Rights (UDHR). In the digital era, freedom of expression is increasingly crucial because it allows people to express opinions, share information and monitor public policy more broadly (Budianto & Nurhayati, 2023). The internet and social media have become the main tools for voicing opinions and building

dynamic public discourse. However, this freedom also raises new challenges, especially related to misuse of information and potential legal conflicts.

In Indonesia, the development of information technology is followed by regulations that aim to regulate the use of digital media. Law Number 11 of 2008 concerning Information and Electronic Transactions (UU ITE) was then updated through Law Number 19 of 2016. This law aims to provide legal certainty in the use of information technology, protect individual rights in the digital space, and prevent cyber crime (Syukur et al., 2023). However, in practice, several provisions in the ITE Law actually give rise to polemics, especially those related to articles that are considered to have the potential to limit freedom of expression.

One of the most controversial articles is Article 27 paragraph (3) of the ITE Law which regulates defamation in the digital realm. This article states that anyone who intentionally and without authorization distributes, transmits or makes accessible electronic information containing insults or defamation can be punished. This provision is often associated with Articles 310 and 311 of the Criminal Code concerning defamation, but with a wider scope because it applies in the digital world. As a result, this article is often used to criminalize expressions that should be protected as a form of freedom of opinion (Adiwijaya, 2022).

In recent years, the implementation of Article 27 paragraph (3) of the ITE Law has shown an alarming trend. Many cases show that this article is more often used to report individuals who criticize public officials, companies or certain figures. This gives rise to the opinion that the article functions more as a repressive tool than as an instrument for fair legal protection. Many activists, journalists and ordinary people have been caught in legal cases because of posts on social media that are considered defamatory of other parties (Mika-Bresolin, 2024). This condition raises concerns that this article is being used as a tool to silence criticism, not as a mechanism for fair legal protection.

From a human rights perspective, the application of this article has the potential to conflict with the principle of freedom of expression guaranteed by the constitution. Human rights organizations, both at home and abroad, have repeatedly voiced the need for revision of this article so that it is not misused. In fact, the Constitutional Court has received various requests for judicial review of this article, although most of them maintain its validity. The ongoing legal debate shows that there are fundamental problems in the

formulation and implementation of this article that need to be studied further (Lee, 2021).

Apart from that, differences in interpretation in the application of Article 27 paragraph (3) of the ITE Law also create legal uncertainty for the community. Many people feel that this article is too subjective and is easily used to ensnare people for reasons that are not always clear. Not infrequently, cases related to defamation result in the criminalization of individuals who only intend to express opinions or convey criticism (Maharani et al., 2022). This shows that there is an urgent need to evaluate the effectiveness and proportionality of the article in protecting individual rights without compromising freedom of expression.

This research is relevant to conduct because it can provide a critical analysis of the application of Article 27 paragraph (3) of the ITE Law based on a review of legal literature. By reviewing various previous research, case studies, as well as the views of academics and legal practitioners, this research will reveal the extent to which this article functions as legal protection or instead as a tool for criminalizing expression. It is hoped that the results of this research can contribute to the discourse on revising the ITE Law and strengthen advocacy for freedom of expression in Indonesia.

Thus, this research aims to provide a deeper understanding of the legal implications of Article 27 paragraph (3) of the ITE Law. Through a literature review approach, this research will examine various aspects related to the application of this article, both in terms of regulations, legal practice and its impact on society. It is hoped that this research can provide constructive recommendations in an effort to create a balance between legal protection and freedom of expression in Indonesia.

RESEARCH METHOD

This research uses a qualitative approach with a literature review method to analyze the application of Article 27 paragraph (3) of the ITE Law in the context of legal protection and freedom of expression. The literature review was carried out by examining various legal sources, including statutory regulations, court decisions, academic journals, and reports from human rights organizations. This approach allows research to explore various legal and social perspectives related to the application of the article without conducting direct empirical research. Thus, this research will provide a comprehensive analysis of how this article is interpreted and applied in legal practice in Indonesia.

In addition, this research will analyze various relevant case studies, especially cases that show the potential for criminalization of expression due to the implementation of Article 27 paragraph (3) of the ITE Law. Case studies will help identify patterns of application of this article and its impact on individuals caught in the law. Evaluation of previous research and opinions of legal experts will also be carried out to strengthen the arguments in this research. By examining various perspectives, it is hoped that this research can provide constructive academic recommendations regarding the revision or reform of legal policies to create a balance between legal protection and freedom of expression in Indonesia (Creswell & Poth, 2016; Tisdell et al., 2025; Yin, 2017).

RESULT AND DISCUSSION

Controversial Cases in the Application of Article 27 Paragraph (3)

Article 27 paragraph (3) of the ITE Law concerning defamation has been a subject of long debate because it is often used to ensnare individuals who convey criticism in the digital space. Several cases show that this article is used more to silence critics than to protect the public from actual defamation. Criticism of certain public officials, institutions and individuals often results in criminal reporting, even though the criticism is conveyed in the context of the public interest (Cheng, 2023).

One of the most well-known cases is that of Baiq Nuril, an honorary employee in Lombok who was charged under Article 27 paragraph (3) of the ITE Law after recording a telephone conversation with his superior that contained verbal abuse. The recording was then spread without his knowledge, but Baiq Nuril was charged with defamation (Karo-Karo, 2021). This case is in the national spotlight because it shows how the ITE Law can be used to criminalize victims, not the actual perpetrators. As a result of this case, Baiq Nuril had to undergo a long legal process until finally receiving amnesty from President Joko Widodo.

Another case that has also attracted public attention is the case of journalist Muhammad Asrul in South Sulawesi. He was charged with Article 27 paragraph (3) of the ITE Law after writing an investigative report about alleged corruption by regional officials. The report he wrote aimed to reveal alleged abuse of authority, but instead resulted in a legal report against him (Lenkova, 2023). This case raises concerns about press freedom in Indonesia, because journalists can easily be criminalized when reporting things that are considered detrimental to certain parties.

Apart from affecting journalists, this article is also often used to ensnare activists and ordinary people. For example, a housewife in Tangerang was reported to the police after complaining about the quality of PDAM water in the WhatsApp group. Even though the complaint stems from personal experience and public interest, he still has to face a tiring legal process. A similar case was also experienced by a resident who criticized hospital services on social media, which was ultimately reported by the hospital under the pretext of defamation (Achnuphi et al., 2024).

The legal impact of implementing this article is very large for the individuals involved. They have to face lengthy legal processes that often result in criminal sentences, even though all they did was voice an opinion or reveal facts that should be of public concern (Habibah et al., 2024). Apart from that, they often face legal uncertainty because this article has a broad interpretation and can be used to ensnare anyone based on subjective complaints from parties who feel disadvantaged.

Socially, individuals who are subject to Article 27 paragraph (3) of the ITE Law often experience stigma and pressure, both from the surrounding environment and the media. Those who originally only wanted to express their opinions instead faced criminal threats that harmed their reputations and personal lives. Many of them lost their jobs, were shunned by the social environment, and experienced psychological pressure due to the legal cases that befell them (Sepranadja, 2024).

Apart from that, the implementation of this article also creates a deterrent effect in society, where many people are afraid to express criticism or opinions openly, especially on social media. This phenomenon is dangerous for democracy, because it can hamper transparency, accountability and freedom of expression which are part of human rights (Putranto & Harvelian, 2021). Therefore, revision and evaluation of this article is very necessary to prevent misuse of the law which could harm the wider community.

Weaknesses and Challenges in Implementing This Article

One of the main weaknesses in the implementation of Article 27 paragraph (3) of the ITE Law is the lack of clarity in legal norms in defining defamation. This article does not provide strict boundaries regarding what is meant by "defamation" in a digital context. As a result, the application of this article often refers to Articles 310 and 311 of the Criminal Code, which are actually designed for defamation cases in direct communication, not in the digital space. The different characteristics of digital media and conventional

communication cause discrepancies in the application of the law, which often creates uncertainty for people who use social media as a means of expression (Khandkarov, 2023).

This ambiguity also opens up space for multiple interpretations which have the potential to harm freedom of expression. Article 27 paragraph (3) uses the phrase "distributing, transmitting or making accessible electronic information" as a basis for criminalization, but does not specifically explain the extent to which such actions can be considered defamation (Sugara, 2023). As a result, someone can be caught in the law just because they share or comment on a post on social media that is considered defamatory of another party, even though they do not have malicious intentions or are simply expressing an opinion in the context of the public interest.

In addition, there is a tendency that this article is more often used by parties who have political, economic or social power to report individuals who criticize them. Many cases show that it is easier for public officials, entrepreneurs or institutions to use this article to ensnare citizens who criticize their policies or services (Timur et al., 2020). This creates inequality in the implementation of the law, where ordinary individuals are more vulnerable to lawsuits than those with access to legal resources and power.

Another challenge in implementing Article 27 paragraph (3) is the gap between legal norms and practice in the field. Although in criminal law theory there is a principle of "ultimum remedium" (criminal law as a last resort), in practice, many cases of defamation immediately result in punishment without considering other resolution mechanisms, such as the right of reply or mediation (Fatimatuzzahra et al., 2023). This is contrary to the spirit of legal reform which should prioritize a non-litigation approach in resolving disputes in the digital space.

The lack of understanding by law enforcement officials regarding aspects of freedom of expression in democracy is also a challenge in implementing this article. Many reports show that police officers tend to immediately process defamation reports without considering whether the posts or statements fall into the category of legitimate criticism. As a result, many cases that should not have entered the criminal realm are still being processed due to pressure from influential reporting parties (Jianyuan, 2024).

Apart from legal and practical aspects, another challenge that arises is the social impact of implementing this article. Fear of criminal threats makes many people more careful in expressing opinions on social media, which ultimately creates the effect of "self-censorship" or self-limitation in

expression. If this condition continues, the democratic climate in Indonesia could be threatened because people will become reluctant to criticize or express their opinions openly (Pejoreza et al., 2023).

With these various weaknesses and challenges, reform of Article 27 paragraph (3) of the ITE Law is an urgent need. Revision of this article must consider the balance between protecting individuals from defamation and protecting freedom of expression as a fundamental right in a democratic country. Apart from that, there needs to be clearer guidelines for law enforcement officials in handling defamation cases in the digital space so that there is no excessive criminalization of legitimate expression.

A Critical Review of Interpretation and Implementation

The interpretation and implementation of Article 27 paragraph (3) of the ITE Law has been a long debate among academics and legal practitioners. Many academics are of the opinion that this article has unclear legal norms which open up space for multiple interpretations, so that it is often misused to ensnare individuals who voice their opinions in the digital space. In academic studies, this article is often criticized because it contradicts the principle of freedom of expression guaranteed in Article 28E paragraph (3) of the 1945 Constitution and Article 19 of the International Covenant on Civil and Political Rights (ICCPR), which has been ratified by Indonesia (Nugroho, 2024). Therefore, many academics believe that it is necessary to revise or even delete this article so that it does not become a tool for criminalizing expression in the digital era.

From the perspective of legal practitioners, the application of Article 27 paragraph (3) of the ITE Law is often not in line with the principles of criminal law, especially the principles of *lex certa* (legal certainty) and *ultimum remedium* (criminal law as a last resort). Many lawyers and advocates who handle defamation cases argue that this article does not have clear boundaries regarding the elements of offenses that can be categorized as defamation in the digital space. As a result, someone can be criminalized just for conveying criticism or revealing facts that are actually of public interest (Lubis & Kurniawan, 2022). This shows that current legal practice more often uses this article as a tool of repression rather than as a mechanism for balanced legal protection.

Apart from that, legal practitioners also highlight the pattern of application of this article which tends to be selective and is more often used by parties who have political or economic power to ensnare individuals who

criticize it. In many cases, defamation reports submitted by public officials or corporations are processed more quickly than reports submitted by ordinary citizens. This phenomenon shows that this article is more often used as a legal instrument to silence criticism than as a tool to protect the rights of individuals who are truly victims of defamation (HACIÖMEROĞLU, 2023).

In recent years, the government and DPR have received various recommendations to revise the ITE Law, including Article 27 paragraph (3). One of the main recommendations is to clarify the boundaries of defamation so that it does not include constructive criticism or information of public interest. Several academics and civil society organizations also suggest that defamation disputes should be prioritized to be resolved through civil mechanisms or the right of reply before entering the criminal realm (Brady, 2021). In this way, the potential for criminalization of expression can be minimized.

However, until now, the revision of the ITE Law still has pros and cons. On the one hand, there are groups who want this article to be abolished or significantly revised so that it is no longer used as a tool to criminalize freedom of expression. On the other hand, there are those who argue that this article is still needed to protect individuals from slander and defamation which can widely harm a person's reputation in the digital era (Haris, 2021). This debate reflects that the revision of the ITE Law must be carried out with a balanced approach, so that it can protect the rights of every citizen without sacrificing freedom of expression.

Several countries have provided examples of how defamation regulations can be regulated without compromising freedom of expression. In the United States, for example, defamation is mostly handled as a civil matter, and public officials must prove that the accusations against them were made with actual malice before they can sue someone. Meanwhile, in several European countries, there are mechanisms that allow defamation disputes to be resolved through mediation or the right of reply before they result in legal proceedings (Editorial, 2023). A model like this can be a reference for Indonesia in reforming this article so that it is fairer and not easily misused.

From these various critical reviews, it is clear that a revision of Article 27 paragraph (3) of the ITE Law is very necessary to prevent misuse of the law which has the potential to criminalize expression in the digital space. The government needs to listen to input from academics, legal practitioners and civil society so that the resulting regulations truly reflect a balance between legal protection and freedom of expression. Without a clear and targeted

revision, this article will continue to be a threat to democracy and freedom of expression in Indonesia.

CONCLUSION

Based on this research, it can be concluded that the implementation of Article 27 paragraph (3) of the ITE Law still faces various problems, especially in terms of unclear legal norms and the potential for multiple interpretations which could harm freedom of expression. The cases that have been reviewed show that this article is more often used as a tool to silence criticism than as a mechanism for fair legal protection. In addition, the gap between legal norms and practice in the field further worsens the situation, where many individuals, including journalists and activists, become victims of criminalization of expression just for expressing opinions in digital spaces.

The legal implications of this problem are very significant for democracy and freedom of expression in Indonesia. If not revised, this article will continue to be a threat to people who want to express opinions or criticize public policy. Therefore, legal reform is needed that balances the protection of individuals from defamation and guarantees of freedom of expression. Revision of the ITE Law, including a review of Article 27 paragraph (3), must be carried out taking into account the principles of democracy and human rights so that law in Indonesia no longer becomes a tool of criminalization that can limit the space for free speech in the digital era.

REFERENCES

- Achnuphi, M. N. A. A., Wahyudi, S. T., & Supardi, S. (2024). The Concept of Punishment against Perpetrators of Narcotics Offenses in Article 111 Paragraph (1) And Article 112 Paragraph (2) Of the Narcotics Law. *International Journal of Social Science and Human Research*, 7(12). <https://doi.org/10.47191/ijsshr/v7-i12-72>
- Adiwijaya, A. (2022). Effectiveness of the Implementation of Education Budget Arrangements in the APBN/APBD Based on the 1945 Constitution Article 31 paragraph (4) and Law No. 20 of 2003 concerning the National Education System Article 49 paragraph (1) related to the Covid 19 Pandemic. *Proceedings of the 2nd International Conference on Law, Social Science, Economics, and Education, ICLSSEE 2022, 16 April 2022, Semarang, Indonesia*, Query date: 2025-02-23 16:51:14. <https://doi.org/10.4108/eai.16-4-2022.2319705>
- Brady, M. E. (2021). How J M Keynes Could Have Ended the Eighteen Year Old F P Ramsey's Academic Career Before It Started: On Keynes's Easy, Possible Paragraph by Paragraph Intellectual Decimation, Obliteration

- and Annihilation of Ramsey's Very, Very Poor Three Page Cambridge Magazine 'Article of Jan., 1922. *SSRN Electronic Journal*, Query date: 2025-02-23 16:51:14. <https://doi.org/10.2139/ssrn.3789576>
- Budianto, A., & Nurhayati, E. (2023). Empowerment of Traditional Communities in the Context of Traditional Village Development and Strengthening the Village Economy (Analytical Study of Article 18B paragraph (2) and Article 33 paragraph (4) of the 1945 Constitution of the Republic of Indonesia). *Proceedings of the 3rd Multidisciplinary International Conference, MIC 2023, 28 October 2023, Jakarta, Indonesia*, Query date: 2025-02-23 16:51:14. <https://doi.org/10.4108/eai.28-10-2023.2341675>
- Cheng, X. (2023). The research On Illegality and Medical Fault Presumption: On the Application of the Article 1222 Paragraph 10f the Civil Code of the PRC. *Wonkwang University Legal Research Institute*, 30(Query date: 2025-02-23 16:51:14), 123–164. <https://doi.org/10.22397/bml.2023.30.123>
- Creswell, J. W., & Poth, C. N. (2016). *Qualitative Inquiry and Research Design: Choosing Among Five Approaches*. SAGE Publications.
- Editorial, A. (2023). Experts Council Resolution «Controversial issues of local estriol application». *Obstetrics, Gynecology and Reproduction*, 17(1), 154–162. <https://doi.org/10.17749/2313-7347/ob.gyn.rep.2023.379>
- Fatimatussahra, F., Nazhimah, S., & Rasji, R. (2023). Juridical Analysis of Abortion Cases According to Legal Perspective on Human Rights According to Law Number 39 of 1999 Article 52 Paragraph (2). *QISTINA: Jurnal Multidisiplin Indonesia*, 2(2), 857–862. <https://doi.org/10.57235/qistina.v2i2.822>
- Habibah, T., Hidayat, A., & Dewi, S. (2024). THE APPLICATION OF DIFFERENT CRIMINAL SANCTIONS AGAINST DRUG ABUSERS IS CONNECTED WITH ARTICLE 112 PARAGRAPH (1) OF LAW NUMBER 35 OF 2009 CONCERNING NARCOTICS. *Justisi: Jurnal Ilmu Hukum*, 9(1), 1–19. <https://doi.org/10.36805/jjih.v9i1.6385>
- HACIÖMEROĞLU, A. O. (2023). İCRA VE İFLAS KANUNU'NUN 296'NCI MADDESİNİN BİRİNCİ FIKRASI KARŞISINDA TÜRK TİCARET KANUNU'NUN 1413'ÜNCÜ MADDESİNİN BİRİNCİ FIKRASININ AKİBETİ. *Ankara Hacı Bayram Veli Üniversitesi Hukuk Fakültesi Dergisi*, 27(4), 167–196. <https://doi.org/10.34246/ahbvuhfd.1352059>
- Haris, S. (2021). Factors Inhibiting the Effectiveness of Enforcement Article 106 Paragraph (1) of the Traffic Law No. 22 of 2009. *Estudiante Law Journal*, Query date: 2025-02-23 16:51:14, 83–94. <https://doi.org/10.33756/eslaj.voio.15761>
- Jianyuan, C. (2024). It Is Not Allowed to Blindly Expand the Scope of Application of Article 44, Paragraph 2 of the Contract Law. *Chinese Civil Adjudications II*, Query date: 2025-02-23 16:51:14, 56–65. <https://doi.org/10.4324/9781032725673-4>

- Karo-Karo, R. P. P. (2021). THE REASON TO AMANDMENT OF ARTICLE 27 PARAGRAPH (1), ARTICLE 28 PARAGRAPH (1) AND (2) OF THE ITE LAW THAT ARE CONSIDERED TO HAVE MULTIPLE INTERPRETATION OF THE ITE LAW IN THE TIME OF THE COVID-19 PANDEMIC FOR LEGAL CERTAINTY. *Indonesian Law Journal*, 14(1), 1–18. <https://doi.org/10.33331/ilj.v14i1.46>
- Khandkarov, Iu. S. (2023). Prohibition of Refund of Knowingly Unnecessary Performance: Interpretation and Application of Paragraph 4 of Article 1109 of the Civil Code of the Russian Federation. *Civil Law Review*, 1(Query date: 2025-02-23 16:51:14). <https://doi.org/10.24031/1992-2043-2023-23-1-172-214>
- Lee, E. (2021). A Study on the Application of the ‘Subjective Starting Point’ of the Right to Claim Compensation for Tortious Acts—Focused on the cases of Article 2, Paragraph 1, No. 3 and No. 4 of the Truth and Reconciliation Act -. *The Justice*, 185(Query date: 2025-02-23 16:51:14), 100–128. <https://doi.org/10.29305/tj.2021.08.185.100>
- Lenkova, T. (2023). The Lead Paragraph is a Structural Element of the Article and a Self-contained Text. *Philology & Human*, 1, 179–191. [https://doi.org/10.14258/filichel\(2023\)1-14](https://doi.org/10.14258/filichel(2023)1-14)
- Lubis, R. A., & Kurniawan, P. (2022). Implementation of Child Birth Registration in Kampung Baru Village, Lingga Bayu District, Mandailing Natal Regency in terms of Article 27 Paragraph (1) Law Number 13 Number 24 of 2013 concerning Population Administration. *Jurnal El-Thawalib*, 3(3), 461–472. <https://doi.org/10.24952/el-thawalib.v3i3.5644>
- Maharani, N. M. A. D., Somawijaya, S., & Ramdan, A. (2022). Critical Analysis of Application of Article 303 BIS Paragraph (1) to 1 of The Criminal Code in Accessible Cases Online Gambling. *Pandecta Research Law Journal*, 17(2), 167–177. <https://doi.org/10.15294/pandecta.v17i2.29353>
- Mika-Bresolin, K. (2024). Difficult Opacity: On Reading Difference. *Paragraph*, 47(1), 12–27. <https://doi.org/10.3366/para.2024.0448>
- Nugroho, A. (2024). Implementation of SKB Number 229 of 2021, Number 154 of 2021, Number KB/2/VI/2021 against ITE Delik Article 27 Paragraph (3) of Law Number 11 of 2008. *Jurnal Indonesia Sosial Teknologi*, 5(3), 717–735. <https://doi.org/10.59141/jist.v5i3.932>
- Pejoreza, D. D., Fadli, M., & Sulistyarini, R. (2023). Implementation of the Principle of Recognizing Service Users for Notary (Study of Application of Article 2, Paragraph (2) Permenkumham No. 9 of 2017 in Malang City. *Jurnal Multidisiplin Madani*, 3(7), 1639–1648. <https://doi.org/10.55927/mudima.v3i7.4824>
- Putranto, R. D., & Harvelian, A. (2021). Study of Production Management of Non-Immoral Tiktok Content Based on the Electronic Information and Transaction Law (Article 27 Paragraph (1) of Law Number 19 of 2016). *JUDICIOUS*, 2(2), 238–244. <https://doi.org/10.37010/jdc.v2i2.1155>

- Sepranadja. (2024). The Application of Article 56 Paragraph (1) of the Indonesian Criminal Procedure Code (KUHAP) from a Human Rights Perspective in Relation to the Integrated Criminal Justice System in Indonesia. *International Journal of Science and Society*, 6(3), 121–140. <https://doi.org/10.54783/ijsoc.v6i3.1228>
- Sugara, A. (2023). Legal Analysis of Law Number 8 Year 2011 Article 10 Paragraph 1 Regarding Final Constitutional Court Decisions. *JUSTICES: Journal of Law*, 2(2), 122–131. <https://doi.org/10.58355/justices.v2i2.29>
- Syukur, M. J., Sakmaf, M. S., & Karauwan, D. (2023). EFFORTS TO PREVENT INDICATIONS OF CRIMINAL ACTS IN NOTARIAL DEEDS THROUGH THE APPLICATION OF ARTICLE 39 PARAGRAPH (2) OF THE UUJN. *Al-Risalah Jurnal Ilmu Syariah Dan Hukum*, Query date: 2025-02-23 16:51:14, 102–122. <https://doi.org/10.24252/al-risalah.vi.40403>
- Timur, W., Hermana, M. A., & Annisa, A. (2020). Juridical Review Article 27 Paragraph (1) of the Law of the Republic of Indonesia Number 11 of 2008 concerning Information and Electronic Transactions against the Crime of Online Prostitution in Indonesia. *JURNAL HUKUM SEHASSEN*, 6(2). <https://doi.org/10.37676/jhs.v6i2.2039>
- Tisdell, E. J., Merriam, S. B., & Stuckey-Peyrot, H. L. (2025). *Qualitative Research: A Guide to Design and Implementation*. John Wiley & Sons.
- Yin, R. K. (2017). *Case study research and applications: Design and methods*. Sage publications.