

Unlawful Acts and Legal Bullying: A Normative-Empirical Juridical Analysis of Case No. 1206/PDT.G/2025/PN JKT.BRT

I Nyoman Suandika*, Hanphie Agusoeito

Universitas Mahendradatta, Indonesia

Email: pakde278@gmail.com*, hanphie.advokat@gmail.com

Keyword:

Unlawful Acts; Legal Bullying; SLAPP; Abuse of Rights; Nominative Fair Use.

ABSTRACT

This research analyzes two issues: first, the harmonization of norms between the provisions of unlawful acts (PMH) Article 1365 of the Civil Code and the instrument for the protection of the right to information in determining the limits of legitimate educational expression; second, the qualification of a lawsuit based on Article 1365 of the Civil Code against financial educators on social media as onrechtmatige procesvoering/misbruik van recht. The research uses normative-empirical juridical methods with legislative, conceptual, case, and comparative approaches, focusing on Case Number 1206/PDT.G/2025/PN JKT.BRT, PT. Tunas Tangkas Primaraga Sakti against financial educator Apriliana. The results of the study show that Article 1365 of the Civil Code does not provide an operational definition of the element of "unlawful", thus opening up space for expansive interpretation that has the potential to override the constitutional right to information according to Article 28F of the 1945 Constitution of the Republic of Indonesia in conjunction with Article 19 of the ICCPR. The a quo lawsuit meets three indicators of legal bullying: formal defects (*ultra vires mandati* and error in persona), disproportionate claim value (Rp3,654,182,500 without an accountable methodology), and indications of intimidation through a request for security confiscation of the defendant's private house. The mention of a trademark in educational content is qualified as a valid nominative fair use because it does not meet the elements of trademark use in trade according to Law Number 20 of 2016.

INTRODUCTION

Internet users in Indonesia reached 212 million people, with 167 million active social media users recorded in 2025. This scale of digital participation has positioned platforms such as Instagram, YouTube, and TikTok as digital public spheres for disseminating financial literacy content by financial educators. However, the same scale of participation has also created opportunities for the misuse of civil law instruments to suppress legitimate expression, a phenomenon recognized in comparative legal discourse as Strategic Lawsuit Against Public Participation (SLAPP) and increasingly discussed in Indonesia as "legal bullying." This phenomenon threatens freedom of expression and the right to information guaranteed by the Constitution, particularly amid the growing need for public financial literacy in Indonesia, which reached only 37.6% in 2024 according to the National Survey on Financial Literacy and Inclusion (OJK, 2024).

Article 1365 of the Civil Code (Kitab Undang-Undang Hukum Perdata / KUHPerdata) regulates unlawful acts (*onrechtmatige daad*) without providing an operational limitation of the term "unlawful." The absence of a clear definition creates room for expansive interpretation that may potentially be used as an instrument of intimidation against

factual and public interest-oriented educational expressions (Du, 2026; Gottbrath, 2025). Such conditions are inconsistent with the principle of legal certainty (*Rechtssicherheit*), which Gustav Radbruch identified as one of the fundamental values of law alongside justice (*Gerechtigkeit*) and utility (*Zweckmässigkeit*). Within the hierarchy of legal norms, the 1945 Constitution of the Republic of Indonesia occupies the highest position; therefore, the interpretation of Article 1365 of the Civil Code concerning digital expression cannot be separated from constitutional guarantees of freedom of expression and the right to information as regulated under Article 28F of the 1945 Constitution and reinforced by Article 19 of the International Covenant on Civil and Political Rights (ICCPR), which was ratified through Law Number 12 of 2005.

The concept of SLAPP was initially formulated by Pring through research examining patterns of lawsuits designed not primarily to win legal disputes but to intimidate parties expressing opinions or providing information related to public interests. In Indonesia, Wiratraman emphasized that legal instruments have frequently been used as mechanisms to suppress criticism and control public narratives, a pattern that has evolved alongside the development of digital media. Article 19 noted that Indonesia's judicial system does not yet have a specific mechanism for screening potentially intimidating lawsuits, thereby creating opportunities for parties with greater economic resources to use legal processes as instruments of suppression. The novelty of this article lies in the use of Case Number 1206/Pdt.G/2025/PN Jkt.Brt as a contemporary case study integrating the analysis of unlawful acts, *misbruik van recht*, *onrechtmatige procesvoering*, and nominative fair use in trademark law within the framework of disputes concerning financial education content on social media. This combination of issues remains insufficiently explored in Indonesian civil law literature.

The object of this article's case study is the lawsuit filed by PT Tunas Tangkas Primaraga Sakti against financial educator Apriliana, S.E., M.Pd., who owns an Instagram account with more than 163,000 followers, concerning content containing calculations of padel sports costs based on publicly available price information (public domain). The plaintiff claimed material and immaterial damages totaling IDR 3,654,182,500, accompanied by a request for a conservatory attachment (*conservatoir beslag*) over the defendant's private residence.

Based on previous studies, research on SLAPP in Indonesia remains limited and generally focuses on criminal law or press-related issues, while studies examining unlawful act lawsuits under Article 1365 of the Civil Code as instruments of legal bullying in the digital sphere remain scarce. Research by Wiratraman (2014) and Article 19 (2020) primarily highlighted restrictions on freedom of expression within conventional public spaces. Meanwhile, studies concerning the doctrines of *misbruik van recht* and *onrechtmatige procesvoering* in Indonesian civil procedural law have largely remained theoretical and have not been extensively applied to contemporary digital-era cases.

The novelty of this research lies in several aspects. First, this article integrates the analysis of unlawful acts, abuse of rights (*misbruik van recht*), unlawful litigation processes (*onrechtmatige procesvoering*), SLAPP, and nominative fair use within a single analytical framework for lawsuits concerning financial education content on social media, a combination that has not been widely examined in Indonesian legal literature. Second, this

article uses Case Number 1206/Pdt.G/2025/PN Jkt.Brt as a contemporary case study representing the phenomenon of legal bullying in the digital era, providing an advancement from previous studies that have generally remained theoretical and have not addressed concrete social media disputes. Third, this research formulates normative parameters to distinguish legally protected educational expressions from unlawful acts in the digital environment, an approach that has not yet been systematically developed in Indonesian jurisprudence or legal doctrine.

Based on this description, this article formulates two research problems. First, how are legal norms harmonized between the provisions on unlawful acts under the Civil Code and instruments protecting the right to information in determining the boundaries between legitimate educational expression and unlawful acts in cyberspace? Second, does the civil lawsuit based on Article 1365 of the Civil Code against financial educators on social media in Case Number 1206/Pdt.G/2025/PN Jkt.Brt fulfill the legal qualifications of legal bullying (*onrechtmatige procesvoering/misbruik van recht*) under positive Indonesian law?

This article aims to analyze these two issues and formulate normative parameters for distinguishing legally protected educational expressions from unlawful acts in the digital realm. Specifically, this research examines the harmonization between Article 1365 of the Civil Code and the right to information in determining the boundaries between legitimate educational expression and unlawful acts in cyberspace, analyzes the qualification of the lawsuit in Case Number 1206/Pdt.G/2025/PN Jkt.Brt as legal bullying based on the doctrines of *misbruik van recht* and *onrechtmatige procesvoering*, and develops normative parameters for evaluating digital expressions. This research contributes to the development of civil law and civil procedural law in Indonesia in addressing challenges arising from the digital era. Theoretically, this research contributes by developing the doctrine of unlawful acts in relation to digital expression, enriching discussions on *misbruik van recht* and *onrechtmatige procesvoering*, and integrating SLAPP and nominative fair use doctrines into civil law analysis. Practically, this research provides references for judges, advocates, and policymakers in identifying abusive lawsuits and developing anti-SLAPP regulations, as well as establishing clearer operational boundaries for the "unlawful" element under Article 1365 of the Civil Code in the digital era.

METHOD

This research employed a normative-empirical juridical method. The normative approach was used to analyze the consistency and harmonization of positive legal norms, including the Civil Code, the 1945 Constitution of the Republic of Indonesia, the Public Information Disclosure Law, and the Trademark and Geographical Indications Law. The empirical approach was applied to examine the implementation of these norms in Case Number 1206/Pdt.G/2025/PN Jkt.Brt as a case study. The research utilized four approaches: a statute approach, a conceptual approach examining the doctrines of *misbruik van recht*, *onrechtmatige procesvoering*, SLAPP, and nominative fair use; a case approach; and a comparative approach to anti-SLAPP regulations in various jurisdictions.

Primary legal materials consisted of the 1945 Constitution of the Republic of Indonesia, the Civil Code, Law Number 12 of 2005 concerning the Ratification of the ICCPR, Law Number 14 of 2008 concerning Public Information Disclosure, Law Number 20

of 2016 concerning Trademarks and Geographical Indications, relevant court decisions, and legal documents related to Case Number 1206/Pdt.G/2025/PN Jkt.Brt, including the lawsuit, responses, evidence, and counterclaims. Secondary legal materials included civil law and human rights literature, national and international academic journals, and reports from relevant international institutions. The legal materials were analyzed using qualitative-prescriptive methods through the identification of applicable legal norms, analysis of gaps between legal provisions and practical legal protection needs, and formulation of normative recommendations.

RESULTS AND DISCUSSION

Conflict of Norms between Article 1365 of the Civil Code and the Constitutional Right to Information

Article 1365 of the Civil Code states that every act that violates the law and causes harm to another person obliges the person who caused the loss due to his fault to compensate him (Kitab Undang-Undang Hukum Perdata). The doctrine of civil law requires five cumulative elements: acts, both positive and negligent; unlawful nature, contrary to written norms, subjective rights, decency, or propriety; wrongs (*dolus* or *culpa*); loss; and causal relationships (Prodjodikoro, 2000, pp. 30–45). Educational content that contains factual data and can be substantively verifiable does not meet the second element, because it does not contradict positive legal norms, subjective rights, decency, or good faith.

The right to information is guaranteed by Article 28F of the 1945 Constitution of the Republic of Indonesia and strengthened by Article 19 of the International Covenant on Civil and Political Rights (ICCPR, 1966, art. 19), which was ratified through Law Number 12 of 2005, and affirmed by Law Number 14 of 2008 concerning Public Information Disclosure (Undang-Undang Nomor 14 Tahun 2008). The United Nations Human Rights Committee in General Comment No. 34 affirms that restrictions on freedom of expression can only be justified if they are governed by clear laws, pursue legitimate aims, and are necessary in a democratic society, three conditions that must be met cumulatively (United Nations Human Rights Committee, 2011). Multi-interpretation norms do not meet the requirements provided by law.

In the hierarchy of norms, the 1945 Constitution of the Republic of Indonesia occupies the highest position, so the interpretation of Article 1365 of the Civil Code on digital expression cannot be carried out in isolation from the constitutional guarantee of freedom of expression and the right to information. The absence of an operational definition of the phrase "unlawful" creates a condition that doctrinally is called a rubber article, a provision that is vaguely formulated so that it can be applied expansively according to the interests of the party filing the lawsuit (Radbruch, 1950). The Supreme Court's jurisprudence provides a partial correction to this issue: Supreme Court Decision No. 535 K/Pdt/2016 emphasizes that losses in lawsuits for unlawful acts must be proven in real and definite terms, and speculative losses cannot be the basis for claiming damages (Mahkamah Agung Republik Indonesia, 2016). This rule does not reduce the need for a more precise operational definition of the element of "unlawful" itself.

Basic Doktrinal Legal Bullying: Abuse of Law over Unlawful Process

A SLAPP is defined by Pring and Canan as a civil lawsuit filed by a party with significant economic power against an individual who lawfully submits criticism or information related to public affairs, with the primary purpose not of winning a case but of intimidation and silence (Pring & Canan, 1996). Five characteristics of SLAPP serve as diagnostic indicators: weak legal basis, disproportionate value of claims, power imbalance between parties, use of legal mechanisms for purposes other than seeking justice, and repetitive pressure patterns (Pring & Canan, 1996).

The juridical basis of the doctrine of *misbruik van recht* (abuse of rights) in the Indonesian legal system rests on the construction of Article 1365 juncto Article 1338 paragraph (3) of the Civil Code, which requires that every exercise of rights, including the right to sue as guaranteed by Article 28G paragraph (1) of the 1945 Constitution of the Republic of Indonesia, is carried out in good faith (*goede trouw*) (Kitab Undang-Undang Hukum Perdata, art. 1338). This doctrine has been accepted by the jurisprudence of the Supreme Court. Supreme Court Decision Number 2356 K/Pdt/2010 recognizes abuse of position as an act contrary to good faith (Mahkamah Agung Republik Indonesia, 2010), while Supreme Court Decision Number 3176 K/Pdt/2020 affirms that actions without good faith as required by Article 1338 of the Civil Code are actions that are contrary to the law (Mahkamah Agung Republik Indonesia, 2020). At the district court level, Medan District Court Decision Number 294/Pdt.G/2017/PN.Mdn states firmly that the use of the right to sue that exceeds the limits of propriety and proportionality can be transformed into an unlawful act (Pengadilan Negeri Medan, 2017).

The concept of *onrechtmatige procesvoering*, the unlawful use of judicial proceedings, complements the doctrine of *misbruik van recht* with five operational indicators: lawsuits without a strong legal basis, disproportionate value of claims, additional pressure mechanisms such as bail confiscation, patterns of behavior that indicate intimidation intent, and power imbalances between parties (Hamel, 1950; Van Oven, 1960). Comparative developments show that more than 30 states of the United States have adopted anti-SLAPP laws with mechanisms of early dismissal, reversal of the burden of proof, and protection of legal costs (Evans & Trimble, 2022), while the European Union adopted an Anti-SLAPP Directive in 2024 that requires member states to provide a rapid rejection mechanism against intimidating lawsuits (European Parliament and Council, 2024).

Profile and Chronology of Case Number 1206/Pdt.G/2025/PN Jkt.Brt

On September 16, 2025, Apriliana uploaded content titled "Because of padel, people waste fifty million per year in vain" on its Instagram account, containing the calculation of the cost of padel sports based on open price data, including the rental price of the Tangkas Padel court of IDR 400,000 per hour (Dokumen Perkara Nomor 1206/Pdt.G/2025/PN Jkt.Brt, n.d.). The content explicitly states that padel is a healthy and positive sport, without the content of insults, slander, or false information.

On December 5, 2025, PT. Tunas Tangkas Primaraga Sakti filed a lawsuit for unlawful acts based on Article 1365 of the Civil Code to the West Jakarta District Court, registered on December 15, 2025 with Number 1206/Pdt.G/2025/PN Jkt.Brt. The plaintiff postulated material losses of IDR 640,582,500 from the difference in turnover before and after uploads, as well as immaterial losses of IDR 3,013,600,000 calculated by multiplying

the field rental price (IDR 400,000) by the number of content likes (7,534). The total demand is IDR 3,654,182,500 (Dokumen Perkara Nomor 1206/Pdt.G/2025/PN Jkt.Brt, n.d). The plaintiff also filed an application for the confiscation of security (conservatoir beslag) on Apriliana's private residence. On April 7, 2026, Apriliana's attorneys filed an Execution, Answer, and a reconvention lawsuit based on the doctrines of *misbruik van recht* and *onrechtmatige procesvoering*.

Test Three Legal Indicators of Bullying against a quo lawsuit

1. Lack of Legal Basis

The first indicator test showed that the a quo lawsuit contained three cumulative defects. First, *obscuur libel*: the lawsuit *posita* consistently postulates the use of trademarks without permission, the characteristics of trademark disputes according to the Trademark Law, which are mixed with the construction of unlawful acts of Article 1365 of the Civil Code (Van Oven, 1996). Second, *ultra vires mandati*: the Plaintiff's legal representative acts beyond the limits of the powers granted in the Special Power of Attorney. Third, *error in persona*: there is an error in including the identity of the legal subject in the lawsuit. The three formal defects, combined with the non-fulfillment of the elements of error and unlawful elements as required by Article 1365 of the Civil Code, show that the lawsuit does not have an adequate legal basis.

2. Disproportionate Value of Claims

The methodology of calculating immaterial losses, multiplying the price of field rent by the number of social media likes, equating digital interaction with real economic transactions, equalization that has no academic or juridical basis. The calculation of material losses is also not accompanied by proof of causality between content uploads and decreased turnover, even though the decrease in turnover can be caused by other variables such as seasons or business competition. The rule affirmed by the Supreme Court Decision Number 535 K/Pdt/2016, that losses must be real and definite, not speculative, are not fulfilled by the Plaintiff's postulate of losses (Mahkamah Agung Republik Indonesia, 2016). The total value of the claim of IDR 3,654,182,500 for one educational upload without defamation elements shows a significant disproportionality to the postulated act.

3. Purpose of Intimidation

The third indicator is fulfilled through the application for the seizure of security on the Defendant's private residence, a legal mechanism that is extreme and, in the context of this case, functions as an instrument of psychological pressure, not a guarantee of the implementation of the judgment. There was no attempt at communication or mediation before the lawsuit was filed, which indicates that the Plaintiff's goal was not dispute resolution but silence through the judicial process (Pring & Canan, 1996). The three indicators, the absence of a legal basis, the proportionality of the demands, and the purpose of intimidation, were fulfilled cumulatively. A quo lawsuit thus meets the legal qualifications of bullying/SLAPP as well as meets the elements of *misbruik van recht* and *onrechtmatige procesvoering* according to the construction of Article 1365 juncto Article 1338 paragraph (3) of the Civil Code (Mahkamah Agung Republik Indonesia, 2010, 2020).

Nominative Fair Use: Brand Mention in Educational Content

The nominative fair use doctrine, as formulated in *New Kids on the Block v. News America Publishing, Inc.* (1992), recognizes the legitimacy of using another party's trademark to identify a product or service when: the product cannot be identified without the use of the mark; the use does not exceed the purpose of identification; and the use does not imply sponsorship or affiliation. Article 1 number 1 of Law Number 20 of 2016 concerning Trademarks and Geographical Indications defines a trademark as a mark used to distinguish goods and/or services in trade activities (Undang-Undang Nomor 20 Tahun 2016), while Article 74 of the law restricts trademark rights in the context of descriptive use (Undang-Undang Nomor 20 Tahun 2016).

The mention of the name Tangkas Padel in Apriliana's content does not meet the definition of brand use according to the Trademark Law for three cumulative reasons. First, the mention is referential-descriptive as a factual example of the field rental price, not as a distinguishing mark in trade. Second, there is no intention to gain economic benefits from the mention; the purpose of the content is financial education. Third, based on data from the Intellectual Property Database, the Tangkas Padel brand with the application number JID2025105536 had not obtained a registration certificate at the time the lawsuit was filed, so there were no exclusive rights that could be enforced against third parties (Pangkalan Data Kekayaan Intelektual, 2026). This conclusion is in line with the view of intellectual property law experts who affirm that the mention of business names in an educational context without elements of commercialization does not automatically qualify as trademark infringement (R. H. Prasetyo, personal communication, 2026). Thus, the mention is protected as a manifestation of the right to information according to Article 28F of the 1945 Constitution of the Republic of Indonesia.

The Chilling Effect and Urgency of the Anti-SLAPP Doctrine in Indonesia

Legal uncertainty stemming from the multiple interpretations of Article 1365 of the Civil Code causes a chilling effect, a silencing effect that makes educators refrain from conveying factual information due to the threat of lawsuits (Penney, 2016). This impact is systemic considering that Indonesia's financial literacy index in 2024 will only reach 37.6 percent according to the Financial Services Authority's National Survey on Financial Literacy and Inclusion (Otoritas Jasa Keuangan, 2024). The silencing of financial educators has a direct impact on the availability of information needed by the public to make informed financial decisions, while hindering the target of increasing national financial literacy.

Indonesian jurisprudence has shown the capacity to identify SLAPP lawsuits. The Cibinong District Court Decision Number 212/Pdt.G/2025/PN Cbi, which was upheld by the Bandung High Court Number 785/PDT/2025/PT BDG on December 18, 2025, is the first precedent in Indonesia to explicitly identify and reject SLAPP lawsuits (Pengadilan Negeri Cibinong, 2025; Pengadilan Tinggi Bandung, 2025). Without specific anti-SLAPP regulations, protection for victims of legal bullying remains dependent on the interpretation of judges in a caseistic manner and is not guaranteed consistency across Indonesian jurisdictions.

Referring to the experience of the United States and the European Union, three normative steps are needed. **First**, the court adopted the anti-SLAPP doctrine ex officio by referring to the construction of Article 1365 juncto Article 1338 paragraph (3) of the Civil

Code as the basis for rejecting a lawsuit that met the three legal indicators of bullying in the early stages of the trial. **Second**, the lawmaker formulates an operational definition of the element of "unlawful" in the context of digital expression, including an exception clause for educational, factual, and public interest-oriented expression. **Third**, the harmonization of the Civil Code with Article 28F of the 1945 Constitution of the Republic of Indonesia, the Law on Public Information Disclosure, and Article 19 of the ICCPR to ensure that the interpretation of Article 1365 of the Civil Code does not override the constitutional right to information.

CONCLUSION

First, the findings indicated a fundamental normative gap in Article 1365 of the Civil Code due to the absence of an operational definition of the element of "unlawful." This condition creates legal uncertainty and may potentially undermine the constitutional right to information as guaranteed under Article 28F of the 1945 Constitution of the Republic of Indonesia and Article 19 of the ICCPR. The necessary harmonization requires that educational content based on factual information, delivered in good faith, and oriented toward public interest be recognized as protected expression rather than categorized as an unlawful act.

Second, the lawsuit in Case Number 1206/Pdt.G/2025/PN Jkt.Brt fulfilled the legal characteristics of legal bullying based on three cumulative indicators: the lack of a sufficient legal basis (*obscuur libel*, *ultra vires mandati*, and *error in persona*), a disproportionate claim value of IDR 3,654,182,500 without an accountable calculation methodology, and indications of intimidation through a request for a conservatory attachment (*conservatoir beslag*) over a private residence. The *a quo* lawsuit demonstrated elements of *misbruik van recht* and *onrechtmatige procesvoering* based on the construction of Article 1365 in conjunction with Article 1338 paragraph (3) of the Civil Code, as supported by Supreme Court Decisions Number 2356 K/Pdt/2010 and Number 3176 K/Pdt/2020. The reference to the Tangkas Padel trademark in educational content was qualified as valid nominative fair use because it did not constitute unauthorized trademark use in commerce.

Based on the findings, several recommendations are proposed. For judges and courts, it is recommended that the anti-SLAPP doctrine be considered *ex officio* by referring to the construction of Article 1365 in conjunction with Article 1338 paragraph (3) of the Civil Code as a basis for rejecting lawsuits that fulfill indicators of legal bullying at an early stage of proceedings. Courts should also apply a strict interpretation of the "unlawful" element in cases involving educational, factual, and public interest-oriented expressions. For lawmakers, it is recommended to establish an operational definition of the "unlawful" element in the context of digital expression, including exceptions for educational and public interest content, and to harmonize the Civil Code with Article 28F of the 1945 Constitution, the Public Information Disclosure Law, and Article 19 of the ICCPR. For legal practitioners and advocates, the doctrines of *misbruik van recht* and *onrechtmatige procesvoering* should be utilized as legal arguments when defending clients against potentially abusive lawsuits. For future researchers, further studies are recommended to examine the implementation of anti-SLAPP mechanisms in other jurisdictions and to conduct empirical research on the chilling effects of legal bullying on financial educators and other public educators in Indonesia.

REFERENCES

- Dokumen perkara Nomor 1206/Pdt.G/2025/PN Jkt.Brt, Register Perkara Pengadilan Negeri Jakarta Barat. (n.d.).
- Du, R. (2026). Interdisciplinary approaches to journalism education in Hong Kong. In *The Routledge companion to journalism education*. Routledge.
- European Parliament and Council. (2024). *Directive (EU) 2024 on the protection of persons who engage in public participation from manifestly abusive court proceedings (Anti-SLAPP Directive)*.
- Evans, J. W., & Trimble, M. (2022). Anti-SLAPP laws in the United States. *UC Irvine Law Review*, 12(3), 895–920.
- Gottbrath, J. N. (2025). *Affective teacher TOK: A sociomaterial analysis of teachers' digital literacy practices on social media*.
- Hamel, A. P. (1950). *De grondslagen van het Nederlandsch procesrecht*. Universitaire Pers.
- International Covenant on Civil and Political Rights, 999 U.N.T.S. 171 (1966, December 16).
- Kitab Undang-Undang Hukum Perdata*.
- Mahkamah Agung Republik Indonesia. (2010). *Putusan Nomor 2356 K/Pdt/2010*.
- Mahkamah Agung Republik Indonesia. (2016). *Putusan Nomor 535 K/Pdt/2016*.
- Mahkamah Agung Republik Indonesia. (2020). *Putusan Nomor 3176 K/Pdt/2020*.
- Otoritas Jasa Keuangan. (2024). *Survei Nasional Literasi dan Inklusi Keuangan (SNLIK) 2024*.
- Pangkalan Data Kekayaan Intelektual. (2026). *Data pendaftaran merek* (Data diakses 15 Januari 2026).
- Penney, J. W. (2016). Chilling effects: Online surveillance and Wikipedia use. *Berkeley Technology Law Journal*, 31(1), 117–182.
- Pengadilan Negeri Cibinong. (2025). *Putusan Nomor 212/Pdt.G/2025/PN Cbi*.
- Pengadilan Negeri Medan. (2017). *Putusan Nomor 294/Pdt.G/2017/PN.Mdn*.
- Pengadilan Tinggi Bandung. (2025). *Putusan Nomor 785/PDT/2025/PT BDG*.
- Perkara Nomor 1206/Pdt.G/2025/PN Jkt.Brt (PT. Tunas Tangkas Primaraga Sakti v. Apriliana)*.
- Pring, G. W. (1989). SLAPPs: Strategic lawsuits against public participation. *Pace Environmental Law Review*, 7(1), 3–22.
- Pring, G. W., & Canan, P. (1996). *SLAPPs: Getting sued for speaking out*. Temple University Press.
- Prodjodikoro, W. (2000). *Perbuatan melanggar hukum dipandang dari sudut hukum perdata*. Mandar Maju.
- Radbruch, G. (1950). *Rechtsphilosophie*. De Gruyter.
- Undang-Undang Nomor 14 Tahun 2008 tentang Keterbukaan Informasi Publik*. (2008).
- Undang-Undang Nomor 20 Tahun 2016 tentang Merek dan Indikasi Geografis*. (2016).
- United Nations Human Rights Committee. (2011). *General comment No. 34, Article 19: Freedoms of opinion and expression (CCPR/C/GC/34)*.
- Van Oven, H. R. (1960). *Het Nederlandse burgerlijk recht* (Deel I). Universitaire Pers.
- Van Oven, H. R. (1996). Onrechtmatige daad. In *Mr. C. Asser's Handleiding tot de beoefening van het Nederlands burgerlijk recht* (11th ed., Deel IV: *Verbintenissenrecht*, pp. 125–130). W.E.J. Tjeenk Willink.
- Wiratraman, H. P. (2014). *Press freedom, law and politics in Indonesia: A socio-legal study*.