

# The Dualism of the Concept of Unlawful Acts in Criminal and Civil Law in Indonesia

Boby Daniel Simatupang<sup>1</sup>, Zulfikar<sup>2</sup>, Muhsin Lambok Ilvira<sup>3</sup>, Revita Sari<sup>4</sup>, T. Muzakkar<sup>5</sup>

<sup>1,2,5</sup>, Universitas Putra Abadi Langkat

<sup>3</sup>, Universitas Muslim Nusantara Al-Washliyah

<sup>4</sup>, Universitas Muhammadiyah Sumatera Utara

## ARTICLE INFO

### Article history:

Received: Apr 2, 2026

Revised: Apr 17, 2026

Accepted: Apr 24, 2026

### Keywords:

Civil Law;  
Criminal Law;  
Legal Certainty;  
Legal Dualism;  
Unlawful Acts.

## ABSTRACT

Unlawful Acts (PMH) are a fundamental concept in the Indonesian legal system that plays a vital role in ensuring the protection of rights, justice, and legal order. However, the existence of PMH in two distinct domains—civil law and criminal law—raises conceptual and practical issues, particularly regarding differences in their orientation, elements, and implications of their application. This study aims to explain the concept of PMH in civil law and criminal law, analyze their similarities and differences, and assess the legal implications of this dualism of concepts on legal certainty and the protection of rights. This study employs a normative legal method (doctrinal research) using a statutory approach, a conceptual approach, and a case-based approach through a review of literature, legislation, and case law. Research findings indicate that civil tort law is oriented toward protecting individual interests and compensating for losses through civil liability, while criminal tort law focuses on protecting the public interest through the imposition of criminal sanctions. Although they share common elements—such as unlawfulness, fault, and causation—the two differ in their legal objectives, standards of proof, and the nature of the sanctions imposed. This dualism impacts legal certainty, the consistency of law enforcement, and victim protection. Therefore, a comprehensive conceptual understanding and harmonization efforts are necessary so that these two legal regimes can operate in harmony in realizing justice and legal certainty.

*This is an open access article under the CC BY-NC license.*



## Corresponding Author:

Boby Daniel Simatupang,  
Universitas Putra Abadi Langkat,  
Jl. Letjen R. Soeprapto No.10, Kwalu Bingai, Sumatera Utara 20814. Indonesia.  
Email: simatupangboby69@gmail.com

## 1. INTRODUCTION

Unlawful Acts (PMH) are a fundamental concept in the Indonesian legal system that plays a crucial role in the administration of justice and the protection of citizens' rights. In practice, PMH are not only related to violations of legal norms in general, but also touch upon moral and social aspects, as well as the values of substantive justice that are embedded in society. The importance of studying PMH stems from the fact that various legal issues arising in social life, ranging from civil rights violations to criminal acts, are often rooted in actions categorized as unlawful acts (Susanto et al., 2025).

The significance of the study on tort law is becoming increasingly prominent because this concept has a direct impact on legal certainty, justice, and the protection of victims. On the one hand, PMH serves as an instrument to ensure that any act causing harm can be held legally accountable. On the other hand, societal development, social dynamics, and shifts in the paradigm of justice demand a more comprehensive understanding of the scope and application of this concept (Makruf et al., 2025).

The main issue that frequently arises is the lack of alignment between the concepts of tort in criminal and civil law. In civil law, tort is synonymous with a violation of a person's subjective rights

or legal obligations that causes harm and requires compensation. Meanwhile, in criminal law, tort is more closely associated with a violation of norms punishable by criminal sanctions. The differences in orientation, function, and character between the two often lead to ambiguity in interpretation, legal application, and the determination of elements of liability. This lack of synchronization results in overlapping norms, multiple interpretations, and the potential for injustice for the parties involved in a case (ZAENUDIN, 2025).

In practical terms, this issue has direct implications for legal certainty and justice. Court rulings in cases involving human rights violations still vary, both in terms of the interpretation of legal norms and legal reasoning. This indicates methodological problems and a lack of uniform conceptual understanding, thereby creating uncertainty for those seeking justice. Furthermore, the handling of PMH cases often faces challenges when situated in the gray area between criminal and civil violations, which can ultimately complicate the law enforcement process (Rasiwan, 2025).

From an academic perspective, there is a significant research gap, particularly regarding the scarcity of comparative studies that thoroughly examine the differences, similarities, and common ground between PMH in the criminal and civil spheres. Most studies still focus on only one aspect, thus failing to provide a comprehensive picture of the relationship between the two within the framework of the Indonesian legal system. Furthermore, studies oriented toward judicial practice remain limited, even though an analysis of court rulings is crucial for understanding how the concept of PMH is concretely implemented (Kennedy, 2025).

The urgency of this research lies in the need to provide a systematic, critical, and in-depth analysis of PMH within these two legal domains, while also offering a more structured understanding to support the harmonization of legal concepts. Theoretically, this research is expected to make an academic contribution by strengthening conceptual studies on PMH, enriching legal literature, and serving as a reference for the development of legal theory in Indonesia. Practically, the results of this study are expected to benefit law enforcement officials, academics, and policymakers, particularly in promoting the establishment of legal practices that are more consistent, fair, and ensure legal certainty for the public (Utama et al., 2024).

Based on the background and urgency of the study on Unlawful Acts (PMH), the research questions in this study can be formulated as follows: 1. What is the concept of Unlawful Acts from the perspective of Indonesian civil law, in terms of its definition, elements, and scope of liability? 2. What is the concept of Unlawful Acts from the perspective of Indonesian criminal law, including its characteristics, functions, and limitations on its application? 3. What are the differences, similarities, and conceptual relationships between PMH in the criminal and civil spheres within the Indonesian legal system? 4. What are the legal implications of the dualism and disharmony of the PMH concept regarding legal certainty, justice, and the protection of the rights of the parties in law enforcement practices in Indonesia?

In line with the research questions above, the objectives of this study are: 1. To comprehensively describe the concept of an unlawful act in Indonesian civil law, including its elements, characteristics, and scope of application. 2. To describe the concept of an unlawful act in Indonesian criminal law, along with its principles, objectives, and limitations of application within the criminal justice system. 3. To critically analyze the comparison between Unlawful Acts in the criminal and civil spheres by highlighting the similarities, differences, and the relevance of the relationship between the two. 4. To explain the legal implications of the dualism of the concept of Unlawful Acts on legal certainty, substantive justice, and the protection of rights for the public, while contributing to the development of legal doctrine and judicial practice in Indonesia.

## 2. METHODS

This study is a normative legal study (juridical normative) or doctrinal research that relies on the examination of legal materials as the primary source of analysis. A normative approach was chosen because the focus of the study lies on the analysis of legal concepts, principles, and norms governing Unlawful Acts (PMH) in both civil and criminal law, as well as how these norms are applied in judicial practice in Indonesia (Widyawati et al., 2026).

The approaches used in this study encompass several types of legal approaches. First, the statutory approach, which involves examining various relevant regulations, such as the Civil Code, the Criminal Code, and other relevant laws and regulations. Second, the conceptual approach, which is used to trace, understand, and compare the theoretical concept of PMH from the perspectives of criminal and civil law, including the underlying legal principles and doctrines. Third, the case approach, which involves analyzing court decisions—particularly those of the Supreme Court—to

examine the application of the PMH concept in practice and identify patterns or trends in judicial interpretation.

The legal sources used in this study consist of three types. Primary legal sources include relevant laws and regulations, the Criminal Code (KUHP), the Civil Code (KUHPerdata), and court decisions, particularly Supreme Court rulings related to violations of human rights. Secondary legal materials include various legal literature, textbooks, scientific journals, research findings, and expert opinions that provide explanations and interpretations of the primary legal materials. Meanwhile, tertiary legal materials consist of legal dictionaries, legal encyclopedias, and other supporting sources that help clarify the terms and concepts used (Saputri & Faisal, 2025).

The collection of legal materials was conducted through a literature review by examining relevant laws and regulations, academic literature, and court decisions. All legal materials obtained are then analyzed using qualitative legal analysis techniques, namely by interpreting, classifying, and connecting various legal norms, theories, and court decisions to produce conclusions that are systematic, logical, and academically accountable (Masidin, 2023).

### 3. RESULTS AND DISCUSSION

#### **The Concept of Unlawful Acts in Civil Law**

Tort (PMH) in Indonesian civil law is one of the key instruments for protecting the rights of legal entities and ensuring accountability for damages caused by an unlawful act. Provisions regarding PMH in civil law are explicitly regulated in the Civil Code (KUHPerdata), specifically Article 1365, which states that any unlawful act that causes loss to another person obligates the perpetrator to compensate for such loss. This provision affirms that civil law not only governs contractual civil relationships but also imposes sanctions on acts causing harm outside of a contract (Sukadana, 2025).

In legal developments, the concept of PMH is no longer understood narrowly as merely acts that violate the law, but has undergone a broadening of meaning through doctrine and case law. From a modern perspective, PMH encompasses acts that violate norms of morality, propriety, the principle of due care, and the rights of others recognized by law. This expansion provides a stronger foundation for legal protection, as it allows victims to obtain justice even if the perpetrator's actions are not explicitly regulated by law.

The elements of civil tort generally include several key components. First, there must be an act committed by a legal entity, whether in the form of an active act (commission) or negligence or omission (omission). Second, the act must be classified as an unlawful act, whether because it violates the law, infringes upon another person's subjective rights, violates a legal obligation, contravenes moral norms, or violates the principles of propriety in society. Third, there must be actual harm suffered by another party, whether in the form of material or immaterial harm. Fourth, there must be a causal relationship between the unlawful act and the resulting harm. Fifth, there must be fault (*schuld*), which may take the form of either intent or negligence on the part of the perpetrator.

Liability in civil torts is, in principle, based on the doctrine of fault liability, whereby a person can only be held liable if the resulting damages are the consequence of their fault. However, under certain conditions, the principle of strict liability is also applied, particularly in specific cases involving high-risk activities or those specifically regulated by law. The form of liability generally takes the form of an obligation to compensate for damages, aimed at restoring the victim's condition as closely as possible to the state prior to the occurrence of the unlawful act (HASIBUAN, 2026).

In judicial practice, various court decisions have reaffirmed the concept and application of PMH. The jurisprudence of the Supreme Court, for example, demonstrates that courts not only assess the formal aspects of legal violations but also consider the values of justice, fairness, and the protection of the legal interests of the aggrieved party. Through these rulings, there is both consistency and dynamism in judges' interpretations of the scope of PMH, thereby contributing to the formation and enrichment of the PMH doctrine in Indonesian civil law. Thus, the concept of PMH in civil law plays a strategic role in maintaining the balance of legal interests and ensuring certainty and justice for the parties involved in civil disputes (Zega et al., 2025).

#### **The Concept of Unlawful Acts in Criminal Law**

In Indonesian criminal law, the concept of an unlawful act (PMH) has a different meaning than PMH in the civil sphere, particularly in terms of the orientation and objectives of law enforcement. From a criminal law perspective, PMH is more focused on protecting the public interest, social order, and public safety. An unlawful act in criminal law is fundamentally understood as any act that violates

criminal norms established by law and is punishable by criminal sanctions. Thus, an act is considered unlawful if it meets the elements of a crime explicitly defined in criminal provisions.

The concept of unlawfulness in criminal law was originally interpreted narrowly as an act that explicitly contravenes the law. However, with the development of legal doctrine and court rulings, its meaning has expanded to encompass not only violations of the text of regulations but also acts that contravene legal principles, propriety, and the social norms prevailing in society. Thus, the concept of unlawfulness in criminal law can encompass two dimensions: formal unlawfulness (contrary to written regulations) and material unlawfulness (contrary to the values of justice and the legal interests of society) (Sari, 2020).

The element of unlawfulness in a criminal offense is generally closely linked to the existence of the offense and its elements. An act may be classified as a criminal offense if it satisfies the *actus reus* (the act itself), the element of unlawfulness, and the *mens rea* (the mental state of intent or negligence). The element of unlawfulness serves as an indicator that the act committed not only causes harm to a specific party but is also deemed to disrupt public order and conflict with values protected by criminal law. Additionally, in certain criminal offenses, justifying grounds such as self-defense (*noodweer*), the execution of official duties, or a state of emergency are recognized, which can negate the unlawfulness of an act.

Criminal liability under the concept of criminal tort focuses on the punishment of perpetrators who have been proven beyond a reasonable doubt to have committed an unlawful act. Criminal liability is not determined solely by the existence of an unlawful act, but also requires the perpetrator's capacity to be held responsible, fault in the form of intent or negligence, and the absence of exculpatory grounds. Thus, punishment is not merely retributive but also serves preventive, corrective, and educational functions to maintain order and deter future offenses.

In judicial practice, the concept of unlawfulness in criminal law is often clarified through various court rulings, including Supreme Court decisions that affirm that the assessment of the element of unlawfulness is not merely a textual interpretation based on the law, but also takes into account the values of justice and the public interest. This jurisprudence simultaneously demonstrates that criminal law functions not only as an instrument for enforcing written rules but also as a means to uphold public morality, protect victims, and ensure the attainment of substantive justice. Thus, the concept of unlawfulness in criminal law holds a strategic position in maintaining social order while ensuring the protection of the broader public's legal interests (Sariyono, 2025).

### **A Comparative Analysis of Unlawful Acts in Criminal and Civil Law**

A comparative study of unlawful acts (PMH) in the criminal and civil spheres is essential for understanding the conceptual frameworks of both and assessing their legal implications in law enforcement practice. Although both stem from the basic idea of an act that violates the law and causes harm or disruption to specific legal interests, they have different characteristics, purposes, and consequences (Nurhayati, 2020).

In terms of similarities, both criminal and civil torts are based on the principle that any act that violates legal norms cannot go unaccounted for. Both require an act that qualifies as unlawful, the existence of a specific loss or legal consequence, and a causal relationship between the act and the resulting consequence. Furthermore, these two domains also both recognize the importance of the element of fault, whether in the form of intent or negligence, albeit with different standards of proof and characteristics. Conceptually, both forms of tort are essentially intended to protect legal interests, whether individual or societal.

However, the fundamental difference lies in the orientation, function, and nature of the sanctions imposed. Tort law in civil law is more oriented toward the protection of individual rights and the redress of losses suffered by a specific party; consequently, its sanctions are private in nature, such as compensation, restitution, or other civil remedies. Conversely, PMH in criminal law is oriented toward the protection of the public interest and social order, so the sanctions are public in nature, such as imprisonment, fines, or other forms of punishment intended to be both repressive and preventive. Furthermore, the standard of proof in criminal law is far stricter because it involves the restriction of an individual's fundamental rights through criminal punishment, whereas in civil law, the focus is on proving damages and causation.

Regarding their interconnection, criminal and civil torts cannot be viewed as two entirely separate concepts. The two are interrelated because an act that qualifies as a criminal offense generally also has the potential to cause civil damages. In such circumstances, the perpetrator is not only criminally liable but may also be held civilly liable for damages. This demonstrates a functional

relationship between the two legal systems in providing comprehensive legal protection (Nurhayati, 2020).

At the same time, there is also an area of overlap between criminal and civil torts, particularly in cases that fall into a gray area—for example, acts that are not formally subject to criminal penalties but that materially cause harm and violate standards of justice. In other situations, a single act may be prosecuted both criminally and civilly simultaneously or sequentially. On one hand, this expands access to justice for victims; on the other hand, it has the potential to create legal disharmony and uncertainty if not properly managed, especially when there are differing interpretations between criminal and civil judges regarding the element of unlawfulness. Therefore, a comprehensive understanding and harmonization of concepts are essential so that these two legal regimes can operate in harmony to achieve legal certainty and justice (Dermawan & Oli, 2015).

### **Legal Implications of the Dualism of Unlawful Acts**

The dualism of the concept of “Unlawful Acts” (PMH) in the criminal and civil spheres carries a number of significant legal implications for law enforcement practices in Indonesia. The differences in orientation, elements, and standards of proof between the two not only create complexity in legal interpretation but also directly affect legal certainty, victim protection, and the effectiveness of law enforcement agencies. Therefore, an analysis of the implications of the dualism of PMH is essential to assess the extent to which the legal system is capable of delivering justice that is both proportional and responsive to the evolving needs of society (Abdurrahman et al., 2024).

From the perspective of legal certainty, the dualism of civil and criminal liability has the potential to create inconsistencies in law enforcement, particularly when an act is prosecuted simultaneously through both criminal and civil channels. Differences in the paradigms used by criminal and civil judges to assess the element of unlawfulness can lead to differing rulings on the same act. This situation creates room for inconsistency, multiple interpretations, and even legal uncertainty for the parties involved. On one hand, victims need certainty regarding their rights, while perpetrators need clarity regarding the limits of the legal liability they must bear. It is this conceptual inconsistency that can give rise to doubts in judicial practice.

From the perspective of victim protection, the dual nature of PMH presents two contradictory aspects. On the one hand, the existence of two legal avenues provides victims with broader opportunities to obtain justice, whether through the criminal prosecution of perpetrators or civil recovery of damages. On the other hand, if not properly managed, this situation can actually burden victims with lengthy, complex, and costly legal proceedings. The lack of synchronization between criminal and civil proceedings also has the potential to slow down the fulfillment of victims’ rights, particularly regarding damages or compensation (Kholifah et al., 2025).

For judges and law enforcement officials, the dualism of civil and criminal liability requires analytical acuity and meticulousness in accurately assessing the element of unlawfulness. Law enforcement officials must be able to clearly distinguish the scope, functions, and objectives of each legal regime, while also understanding their points of intersection to prevent overlapping that could harm the parties involved. Judges are required to provide legal interpretations that are consistent, well-reasoned, and in harmony with the values of justice and legal certainty, while other law enforcement officials, such as investigators and prosecutors, are required to understand the civil and criminal aspects in handling overlapping cases.

Given these various implications, the urgency of harmonizing the law regarding the concept of PMH is evident. This harmonization is necessary to achieve consistency between criminal and civil law in assessing the unlawfulness of an act, without undermining the distinct characteristics and functions of each. Harmonization can be achieved through regulatory updates, the strengthening of legal doctrines, and consistent jurisprudence as a guide for judicial practice. Thus, the Indonesian legal system is expected to provide legal certainty, optimally protect victims’ rights, and ensure that substantive justice remains the primary goal of law enforcement (Baskoro et al., 2026).

### **An objective, systematic, and well-reasoned legal analysis supported by strong references**

The analysis in research on the dualism of the concept of Unlawful Acts (PMH) must be conducted objectively, systematically, and persuasively, and supported by strong academic and legal references in order to possess scientific validity and legal credibility. Objectivity is necessary to ensure that every conclusion reached is not influenced by subjective bias but is truly grounded in the provisions of laws and regulations, legal doctrine, and relevant court decisions. With an objective approach, the analysis is able to describe the legal conditions as they are, regarding both the

strengths and weaknesses of the PMH concept in criminal and civil law (Yohanes Suhardin & Jamalum Sinambela, 2025).

In addition to being objective, the analysis must also be structured systematically, that is, following a clear, logical, and structured line of inquiry. The discussion begins with an explanation of basic concepts, followed by an examination of the elements of PMH, the differences and similarities between the two legal regimes, and their legal implications for legal certainty and victim protection. This systematization is important so that the discussion is easy to understand, consistent, and capable of demonstrating the interconnections between the various parts of the analysis in a coherent manner.

The argumentative nature of the analysis is also a crucial aspect. An analysis must not merely be descriptive; it must be accompanied by rational, critical, and logical legal arguments. Every opinion or assessment presented must be built on a clear theoretical foundation, an accurate interpretation of the law, and justifiable legal reasoning. Thus, the analysis not only explains but also provides a critical assessment of the effectiveness, relevance, and consistency of the PMH concept in legal practice in Indonesia (RIKSA, 2025).

To strengthen the quality of the analysis, robust and authoritative references are required. References may include legislation such as the Criminal Code and the Civil Code, decisions of the Supreme Court or other relevant judicial bodies, academic literature, scientific journals, and the views of legal experts. The use of adequate references will provide a scientific basis for the arguments presented while enhancing the research's credibility. By meeting these four criteria, the analysis in this study is expected to produce an in-depth and accurate study, as well as make a meaningful contribution to the development of legal science and law enforcement practices in Indonesia.

#### 4. CONCLUSION

Based on the results of a study on the dualism of the concept of unlawful acts (PMH) in criminal and civil law, it can be concluded that civil unlawful acts are oriented toward the protection of individual rights and the recovery of damages through civil liability mechanisms, while criminal unlawful acts focus on the protection of the public interest and the enforcement of social order through criminal punishment. Both share commonalities in requiring the existence of an unlawful act, fault, damages, and a causal relationship, but differ in standards of proof, the purpose of sanctions, and the nature of legal liability. This dualism has significant legal implications for legal certainty, victim protection, and the consistency of law enforcement. Therefore, a comprehensive understanding and a harmonious approach are necessary so that these two legal regimes can operate in tandem to achieve justice and legal certainty. Academically, there is a need to strengthen theoretical and conceptual studies regarding the systemic relationship between criminal and civil human rights violations to enrich national legal doctrine. For policymakers, steps are needed to harmonize regulations and synchronize norms to minimize potential disharmony and legal uncertainty. Law enforcement officials, particularly judges, prosecutors, and investigators, are advised to deepen their understanding of the differences and interconnections between these two concepts of human rights violations so that law enforcement can be more consistent, effective, and fair. Moving forward, further research should focus on empirical studies of judicial practices and in-depth analysis of case law to provide a stronger foundation for legal reform and improved legal protection for the public.

#### REFERENCES

- Abdurrahman, M. I., Agustina, S. H., & MH, P. (2024). Analisis Perbedaan Prinsip Kesalahan Dan Implikasinya Terhadap Tanggung Jawab Dalam Perbuatan Melawan Hukum: Studi Komparatif Antara Hukum Indonesia Dan Hukum Inggris. *Lex Patrimonium*, 3(1), 5.
- Baskoro, S. E., Muslim, P. P., Hamamah, F., Purborini, V. S., & Zainuddin, M. (2026). *SISTEM HUKUM INDONESIA DALAM PERSPEKTIF MODERN*. Tren Digital Publishing.
- Dermawan, M. K., & Oli, M. I. (2015). *Sosiologi peradilan pidana*. Yayasan Pustaka Obor Indonesia.
- HASIBUAN, M. F. (2026). *TINJAUAN YURIDIS TERHADAP GANTI RUGI DALAM PERKARA PERBUATAN MELAWAN HUKUM YANG MENIMBULKAN KERUGIAN IMMATERIAL*. Fakultas Kedokteran, Universitas Islam Sumatera Utara.
- Kennedy, A. (2025). Perbuatan Melawan Hukum sebagai Upaya Perlindungan terhadap Hak Subjektif. *Ethics and Law Journal: Business and Notary*, 3(4).
- Kholifah, U. N., Albir, R., Dzakiya, S. A., & Hadi, S. P. F. (2025). Analisis Konsep-Konsep Hukum di Indonesia. *JUSTITIABLE-Jurnal Hukum*, 7(2), 46–61.
- Makruf, S., Pratama, B. Y., Muslimah, A. N., Pratama, M. I., & Shaleh, C. (2025). Teori hukum dan

- filasafat hukum: Membangun responsivitas terhadap perubahan ekonomi dan sosial. *Al-Muamalat Jurnal Hukum Dan Ekonomi Syariah*, 10(1), 94–112.
- Masidin, S. H. (2023). *Penelitian hukum normatif: Analisis putusan hakim*. Prenada Media.
- Nurhayati, Y. (2020). *BUKU AJAR "Pengantar Ilmu Hukum."* Nusa Media.
- Rasiwan, I. (2025). Penegakan Hukum Pidana di Indonesia. *AMU Press*, 1–267.
- RIKSA, A. A. (2025). *Analisis Normatif terhadap Perlindungan Hukum bagi Korban Investasi Bodong dalam Perspektif Hukum Perdata*. Universitas Islam Sultan Agung Semarang.
- Saputri, R., & Faisal, R. M. (2025). Pokok-Pokok Hukum Islam: Pengertian Hukum Islam Secara Etimologis dan Terminologis, Ruang Lingkup, Subyek, Objek, Falsafah, dan Tujuan Hukum Islam. *Cyberlaw: Journal of Digital Cyberlaw*, 1(1), 20–30.
- Sari, I. (2020). Perbuatan Melawan Hukum (PMH) dalam hukum pidana dan hukum perdata. *Jurnal Ilmiah Hukum Dirgantara*, 11(1).
- Sariyono, E. B. (2025). Polri untuk masyarakat: Dalam paradigma pemidanaan modern berdasarkan KUHP nasional guna mewujudkan perlindungan hukum masyarakat. *Proceedings of Police Academy*, 1(1), 132–149.
- Sukadana, D. A. P. (2025). Implikasi Yuridis Wanprestasi dalam Hukum Perdata antara Teori dan Praktik. *Jurnal Rechtsens*, 14(1), 139–154.
- Susanto, S., Priyono, E. A., Astanti, D. I., Sari, P., Imron, A., Widjanarto, H., Triasih, D., Mukharom, M., & Soraya, A. (2025). *Perbuatan Melawan Hukum*. CV. Edu Akademi.
- Utama, M. S. B., Alisia, S. A., Lafipah, N. A., Tulis, M. E. H., & Saripudin, A. (2024). Pengaruh Ilmu Hukum Terhadap Pembentukan Karakter Pemimpin Muda Di Indonesia. *Iuris Studia: Jurnal Kajian Hukum*, 5(3), 852–860.
- Widyawati, A. M. J., Purnomo, H., & Legowo, M. I. (2026). Penyalahgunaan Hak (Abuse Of Rights) Sebagai Bentuk Perbuatan Melawan Hukum Dalam Praktik Peradilan Indonesia. *Jurnal Kolaboratif Sains*, 9(4), 3111–3119.
- Yohanes Suhardin, S. H., & Jamalun Sinambela, S. H. (2025). *PERBUATAN MELAWAN HUKUM DALAM PERDATA & PIDANA: Dari Sengketa Perdata Hingga Jerat Pidana*. TERBIT RAJA BUKU.
- ZAENUDIN, Z. (2025). *REKONSTRUKSI REGULASI MEDIASI DALAM PENYELESAIAN PERKARA PERCERAIAN DI PENGADILAN BERBASIS NILAI KEADILAN*. Universitas Islam Sultan Agung Semarang.
- Zega, S. L., SH, M. H., Yohanes Suhardin, S. H., SINAMBELA, D. R. J., & SH, M. H. (2025). *PERBUATAN MELAWAN HUKUM (Antara Hak Dan Sanksi Dalam Hukum Perdata Dan Pidana)*. TERBIT RAJA BUKU.