

Legal Protection for Journalists in Defamation Cases

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ABSTRACT

*This research aims to analyze legal protection for journalists in Indonesia by reviewing the normative conflict between the Information and Electronic Transactions (ITE) Law and the Press Law, using the Palangka Raya District Court Decision Number 108/Pid.Sus/2019/PN Plk as a case study. The study employs a normative juridical method with a library research approach, examining legislation, court decisions, and relevant literature. The findings indicate the presence of a normative conflict between the Press Law, which provides dispute resolution mechanisms through the right of reply and mediation by the Press Council, and the ITE Law, which prescribes imprisonment of up to four years for defamation. Data show that fourteen journalists were reported under the ITE Law during the 2019–2021 period due to inconsistent understanding among law enforcement officials, weak implementation of the Memorandum of Understanding (MoU) between the National Police and the Press Council, and subjective interpretation of the element “without rights” under the ITE Law. The acquittal of journalist Yundhi Satrya Siman applied the legal principle of *lex specialis derogat legi generali*, prioritizing the Press Law as the applicable special regulation. The study formulates criteria for distinguishing protected journalistic activities, which include actions conducted by registered journalists, adherence to the journalistic code of ethics, orientation toward the public interest, and publication through an authorized press company.*

KEYWORDS *Journalists; ITE Law; Press Law; Conflict of Norms; Press Council.*



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INTRODUCTION

The development of technology and the rapid distribution of information have transformed the world into the digital era (Hilbert, 2020; Yufriadi, Syahriani, & Afifi, 2024). Significant changes have occurred across various sectors as a consequence of technological progress, including the rise of cybercrime (Lagazio, Sherif, & Cushman, 2014; Levi, 2017). The perpetrators of such crimes tend to operate covertly, systematically, and across borders, utilizing electronic devices and the internet to transcend space and time. To address this issue, Indonesia ratified Law of the Republic of Indonesia Number 19 of 2016 concerning Amendments to Law Number 11 of 2008 on Information and Electronic Transactions (ITE Law) to provide legal protection for digital users.

However, in practice, the ITE Law often causes interpretative confusion and misapplication in certain cases, leading to the criminalization of actions that should not be subject to prosecution (Adi et al., 2025; Alhakim, 2022). One group affected by this issue is journalists, who may face criminal charges while performing their professional duty to report facts and express critical opinions. According to the Alliance of Independent Journalists (AJI) Indonesia, between 2019 and 2021, fourteen journalists and one mass media outlet were charged under the ITE Law, totaling fifteen cases over three years. This demonstrates the problematic use of subjective articles that restrict press freedom.

John C. Nerone defines freedom of the press as the freedom to communicate and express opinions through mass media. This principle forms the foundation of press freedom, originating from the recognition of the right to express opinions and self-expression (Irfani, 2020; Muslimin, 2023). Normatively, press freedom is guaranteed under Law Number 40 of 1999 concerning the Press and implicitly protected in the 1945 Constitution of the Republic of Indonesia, particularly in Article 28, which states that “freedom to unite and assemble, to express thoughts orally and in writing, and so on, is regulated by law.” From a democratic standpoint, an independent press is indispensable: without press freedom, there is no democracy; conversely, without democracy, there can be no press freedom.

The complexity of legal protection for journalists has deepened with the implementation of Law Number 19 of 2016 concerning Amendments to Law Number 11 of 2008 on Information and Electronic Transactions (ITE Law). Article 27 paragraph (3) of the ITE Law, which prohibits the distribution of information containing insults or defamation, is frequently used to target journalists, particularly those working in online media. The enforcement of this article has created fear, causing journalists to exercise excessive caution and even self-censorship. Yet, the function of the press as a democratic watchdog requires the freedom to deliver criticism and conduct social oversight.

Legal uncertainty arises from the normative conflict between the ITE Law and the Press Law. The Press Law provides a specific dispute resolution mechanism—through the right of reply, correction, and Press Council mediation, as stated in Article 5 paragraphs (2) and (3). The applicable legal principle, *lex specialis derogat legi generali*, dictates that special laws override general ones. Nevertheless, law enforcement authorities often apply the ITE Law instead, arguing that cybercrime falls under a specialized legal regime. This inconsistency has led to divergent judicial decisions: some judges acquit journalists based on press protection, while others convict them under the ITE Law (Mustawa Nur, 2022; Siagian, 2025).

The case of Yundhi Satrya Siman, as reflected in the Palangka Raya District Court Decision Number 108/Pid.Sus/2019/PN Plk, illustrates this issue. Yundhi, a journalist for Berita Kalteng, was charged with defaming PT Agrindo Green Lestari in an article titled “This is the Evidence of the Allegations PT AGL Fake Documents,” published on February 18, 2018. The report covered a land dispute between residents of Goha Village and PT AGL, citing alleged document forgery. Instead of resolving the issue through the Press Council’s mechanism, PT AGL filed a criminal complaint, and the prosecution charged Yundhi under Article 45 paragraph (3) in conjunction with Article 27 paragraph (3) of the ITE Law, as well as defamation provisions in the Criminal Code.

The panel of judges ultimately acquitted Yundhi. In their considerations, the judges determined that the defendant had attempted verification and offered PT AGL the opportunity to respond—actions consistent with journalistic ethics. The court emphasized that the article constituted legitimate press activity, protected under the Press Law, and not criminal defamation. This decision reaffirms that journalistic work must be viewed within the framework of press freedom. Nevertheless, the underlying normative overlap between the ITE Law and the Press Law remains unresolved, continuing to generate legal uncertainty for journalists.

Based on this background, two main research questions are formulated: first, how does the regulatory framework for legal protection apply to journalists in defamation cases? Second,

what are the normative conflicts between the ITE Law and the Press Law? This research aims to examine the legal protection available to journalists within the Indonesian legal system and to identify the root causes of the existing normative conflicts. Using the Palangka Raya District Court Decision Number 108/Pid.Sus/2019/PN Plk as a case study, the study seeks to support regulatory harmonization and propose a more ideal legal protection framework for journalists in performing their journalistic duties, without neglecting the rights of other parties.

This research ultimately aims to analyze legal protection for journalists in defamation cases by examining normative conflicts between the ITE Law and the Press Law, with the Palangka Raya District Court Decision Number 108/Pid.Sus/2019/PN Plk serving as the focal case. The findings are expected to contribute to harmonizing press regulations, strengthening legal clarity for law enforcement officials and journalists, and reinforcing press freedom as a cornerstone of democracy in Indonesia's digital era.

METHOD

The research methodology employed in this study is a juridical normative approach, which is based on primary legal sources and utilizes theoretical studies, legal concepts, principles, and relevant statutory regulations. The research process is conducted through a literature review, involving the collection and analysis of various relevant references to develop a strong theoretical foundation. The main focus of the study centers on Law Number 40 of 1999 concerning the Press (Press Law) and the Palangka Raya District Court Decision Number 108/Pid.Sus/2019/PN Plk. Data collection is carried out through document analysis, which includes tracing, examining, and reviewing statutory regulations, court decisions, official documents, and related literature. This method enables the researcher to gain a comprehensive understanding of the legal framework governing press freedom and defamation, as well as the application of these norms in judicial practice as reflected in the court decision under examination.

The data analysis technique used in this research is qualitative juridical analysis, which involves systematically interpreting and evaluating legal norms, principles, and concepts. The analysis begins with the identification and classification of all relevant legal materials according to the research issues. Subsequently, legal interpretation is conducted using several methods, including grammatical interpretation (interpreting legal texts based on ordinary language meaning), systematic interpretation (interpreting legal provisions in relation to other relevant provisions), and teleological interpretation (interpreting the law based on its purpose and objectives). Furthermore, the principle of *lex specialis derogat legi generali* is applied to examine the relationship and hierarchy between the Press Law as a special regulation and the Information and Electronic Transactions (ITE) Law as a general regulation governing defamation. The court decision is then analyzed to identify the judges' legal considerations in resolving the normative conflict and to extract the legal principles underlying the defendant's acquittal. The results of this analysis are presented descriptively, providing a clear and systematic overview of legal protection for journalists in defamation cases and the resolution of normative conflicts between the ITE Law and the Press Law.

RESULT AND DISCUSSION

Freedom of the press is one of the foundational pillars of democracy, enabling the public to access information and exercise social control over state administration. Press freedom is not merely the absence of state censorship but also encompasses legal protection for journalists in performing their duties in an increasingly complex digital era. This perspective aligns with the view that the press constitutes the fourth pillar of democracy, functioning as a watchdog over government institutions.

In the Indonesian context, the concept of press freedom has evolved significantly from the reform era to the post-pandemic period. However, press freedom in Indonesia often lacks corresponding moral and legal responsibility in addressing the challenges brought about by digitalization. This irresponsibility is reflected in journalistic practices where the obligation to deliver accurate, balanced, and impartial information that does not harm the public interest is sometimes neglected. Thus, while the press enjoys editorial independence, it must still consider the social impact of each publication. Even within the boundaries of press freedom, journalists remain restricted by ethical and legal norms in disseminating information.

The lack of social responsibility in the press manifests in three key aspects: responsibility toward the public as consumers of digital information, responsibility toward information sources in the era of transparency, and responsibility toward a diverse society to prevent misinformation. This concept underlies the development of a digital-era journalistic code of ethics in Indonesia.

Conflicts of legal norms arise when two or more regulations govern the same issue yet prescribe different legal consequences—a situation that has become more complex in the digital era. In the case of journalist protection, a conflict exists between the Information and Electronic Transactions (ITE) Law, which criminalizes electronic defamation, and the Press Law, which grants special protection to journalistic activities. Resolving this conflict requires the application of legal principles, namely *lex specialis derogat legi generali*, *lex posterior derogat legi priori*, and *lex superior derogat legi inferiori*, while considering developments in information technology. Implementing these principles is key to addressing the normative conflict between the ITE Law and the Press Law in the context of digital media.

The Press Law provides a comprehensive legal framework for the national press system. Article 4 paragraph (1) states: “Press freedom is guaranteed as a basic human right.” This provision affirms that press freedom is a fundamental human right. Articles 5 paragraphs (2) and (3) regulate dispute resolution mechanisms through journalistic obligations, namely: “The press is obliged to serve the right of reply” and “The press is obliged to serve the right of correction.” Article 18 paragraph (2) of the Press Law further provides sanctions, stipulating that “Press companies violating the provisions of Article 5 paragraphs (1) and (2), as well as Article 13, shall be subject to a criminal fine of up to Rp 500,000,000 (five hundred million rupiah).”

Meanwhile, provisions on insults and defamation in electronic media are regulated under Article 27 paragraph (3) of the ITE Law, which states:

“Everyone who intentionally and without the right distributes and/or transmits and/or makes accessible electronic information and/or electronic documents containing insults and/or defamation.”

Article 45 paragraph (3) stipulates the penalty: “Any person who fulfills the elements as referred to in Article 27 paragraph (3) shall be subject to imprisonment for a maximum of four (4) years and/or a fine of up to Rp 750,000,000 (seven hundred and fifty million rupiah).”

According to Press Council Decree No. 03/SK-DP/III/2006, Article 3 of the Code of Ethics for Journalism states: “Indonesian journalists must verify information, report in a balanced manner, avoid mixing facts and opinions, and uphold the presumption of innocence.” Furthermore, Press Council Regulation No. 1/Regulation-DP/III/2012 on Guidelines for Cyber Media Reporting allows exceptions for unverified urgent news provided it serves the public interest and is based on credible sources.

The case analyzed in this study began with an article by Yundhi Satrya Siman, a journalist from Berita Kalteng, titled “This is the Evidence of the Allegations: PT AGL Fake Documents,” published on February 18, 2018. The article alleged document forgery by PT Agrindo Green Lestari (AGL) in connection with a land dispute involving residents of Goha Village, Central Kalimantan (Palangka Raya District Court Decision Number 108/Pid.Sus/2019/PN Plk). Based on court examination, the defendant had attempted to verify information with PT AGL by contacting the company’s Public Relations office and arranging a meeting, which ultimately did not occur (Palangka Raya District Court Decision Number 108/Pid.Sus/2019/PN Plk). The content was sourced from Darius (Chairman of the Goha Village BPD) and Mikhan (a disputed landowner). Instead of resolving the issue through the Press Law’s mechanisms, PT AGL filed a criminal defamation complaint under the ITE Law.

The panel of judges ultimately acquitted the defendant. In their considerations, the judges acknowledged that Yundhi had attempted to verify the information and had provided PT AGL the opportunity to respond, in line with journalistic ethics. The court determined that the article was a legitimate act of press activity—protected under the Press Law—and not a criminal act of defamation. This decision underscores the necessity of viewing journalistic work through the lens of press freedom. However, the underlying issue of overlapping provisions in the ITE Law and the Press Law remains unresolved, perpetuating legal uncertainty for journalists.

An evaluation of this verdict reveals both strengths and weaknesses. Its strength lies in the correct application of the *lex specialis* principle, recognizing that the Press Law, as a special regulation, should take precedence over the general provisions of the ITE Law (Nurdin & Putri, 2024; Lumbanbatu & Esther, 2025). The court also affirmed the press’s democratic role in social oversight and acknowledged the journalist’s compliance with ethical standards by allowing verification and the right of reply. However, the decision’s weaknesses include the absence of reference to the 2017 Memorandum of Understanding (MoU) between the National Police and the Press Council, which outlines coordination procedures before investigating journalists. Moreover, the discussion on the “without rights” element remains limited, particularly regarding whether journalists possess the “right” to publish information grounded in press ethics. The ruling also fails to establish clear criteria distinguishing protected journalistic activity from forms of information dissemination that could lead to criminal liability.

In terms of journalist protection, the 2017 MoU between the Indonesian National Police and the Press Council provides essential coordination guidelines. This MoU stipulates that before investigating a journalist over news content, the police must first consult the Press

Council to ascertain whether a violation of journalistic ethics has occurred or if the issue constitutes a criminal offense (Suparman et al., 2023; Hijriani & Nur, 2024). Additional protective mechanisms include legal aid from press organizations such as the Alliance of Independent Journalists (AJI) and the Indonesian Journalists Association (PWI), as well as mediation oversight by the Press Council. Yet, in practice—as exemplified in the Yundhi Satrya Siman case—these coordination mechanisms are often disregarded, leading to criminal proceedings against journalists without prior verification by the Press Council (Putusan Pengadilan Negeri Palangka Raya, 2019; Cahya, 2022).

An in-depth assessment of the “without rights” element under Article 27 paragraph (3) of the ITE Law highlights the complexity of protecting journalists. According to the court’s interpretation, journalists retain the “right” to disseminate information when acting in accordance with journalistic ethics and the Press Law, provided they adhere to verification standards and respect the right of reply. In Yundhi’s case, although the clarification process was incomplete, his efforts to contact PT AGL and wait for a response over several months demonstrated good faith and compliance with ethical standards. The court further found that the published material involved urgent public interest, identified reliable sources, and concerned a subject difficult to reach—conditions that satisfy the exceptions outlined in the Press Council Regulation on Cyber Media.

The benchmark for differentiating between legitimate journalistic activities that are protected by law and the distribution of information that may be convicted can be formulated through an analysis of court decisions and the provisions of legislation. Journalistic activity can be categorized as legitimate if it meets certain criteria, including:

1. Conducted by registered journalists in press organizations with an official identity in the form of a press card.
2. Implemented based on the Code of Ethics for Journalism, particularly with efforts to verify the truth of information and provide the right of reply to related parties.
3. Oriented to public interest and based on credible sources that are accountable.
4. Published through a legal press company that is officially registered.

On the other hand, the distribution of information can be subject to criminal liability if it is carried out without verification, disregards the right of reply, is motivated by personal or purely commercial interests, or is conducted by unauthorized individuals acting as professional journalists. This formulation is crucial to ensure legal certainty and prevent the criminalization of legitimate journalistic practices.

The current situation reflects a crisis of trust in the criminal law enforcement system regarding news activities in the digital age. This crisis is characterized by the public’s diminishing confidence in justice and the consistent application of the law amid digital transformation. In the context of journalist protection, this crisis manifests in regulatory inconsistencies, where the legal system lacks both internal coherence and external coordination, leading to fundamental contradictions in addressing challenges of the digital era. The application of the Information and Electronic Transactions (ITE) Law to prosecute journalists contradicts the freedom of the press guaranteed under Article 28F of the 1945 Constitution and the special provisions of the Press Law. Such practices harm press freedom by creating a chilling effect that discourages journalists from reporting on sensitive issues of high public interest in digital media. Data from the Alliance of Independent Journalists (AJI)

show an increase in cases filed against journalists under the ITE Law between 2020 and 2023, indicating the misuse of this legal instrument.

Ultimately, deviation from the objective purpose of law—where each statute must be implemented in accordance with its intended rationale—must be avoided, including within the context of technological development. The ITE Law is fundamentally designed to address cybercrime and should not be applied to journalistic activities that are already governed by specific legal provisions under the Press Law.

National law currently faces a constitutional deadlock when two laws of equal authority intersect over the same regulatory domain. Overlapping legislation and vague, multi-interpretable norms create internal discontinuity within the legal system, resulting in legal uncertainty. At the constitutional level, Article 28F of the 1945 Constitution explicitly guarantees the right to information and freedom of communication, encompassing press freedom. However, at the statutory level, a conflict arises between the Press Law, which stipulates specific mechanisms for dispute resolution, and the ITE Law, which criminalizes the publication of allegedly defamatory electronic content. In practice, inconsistencies persist across regions and institutions in how similar cases are adjudicated. Consequently, the resolution of this normative conflict must adhere to the principle of *lex specialis derogat legi generali*. The Palangka Raya District Court Decision Number 108/Pid.Sus/2019/PN Plk illustrates the practical application of this principle; nevertheless, consistent interpretation among law enforcement authorities remains urgently needed.

This crisis of trust in the protection of journalists has broader implications for the strengthening of democracy in Indonesia. The mass media, as one of democracy's main pillars, plays a crucial role in maintaining political balance and ensuring transparency of public information. Legal uncertainty surrounding journalist protection undermines this pillar's stability. The resulting inconsistency in law enforcement erodes public confidence in the justice system, while fear of legal repercussions has diminished the quality of investigative journalism. This, in turn, weakens the press's social control function—its role as a watchdog over those in power—since such a function cannot operate effectively without adequate legal safeguards.

Based on the analysis of the crisis of trust and constitutional deadlock, comprehensive legal reform is necessary. First, harmonization of laws and regulations—both vertically and horizontally—is required to prevent normative conflicts within the framework of technology and digital law. The ITE Law should be revised to explicitly exclude journalistic activities that comply with the Press Law and the journalistic code of ethics, while simultaneously strengthening dispute resolution mechanisms under the Press Law and aligning them with other laws governing freedom of information. Second, strengthening the role of the Press Council as an independent guardian of press freedom is essential. The 2017 Memorandum of Understanding (MoU) between the Indonesian National Police and the Press Council should be reinforced as a binding legal instrument—potentially through government regulation or revisions to the Press Law. Third, enhancing the capacity of law enforcement officials, particularly judges, to understand the intricate relationship between constitutional guarantees and press freedom is vital for ensuring fair decisions. Training programs and seminars on press freedom, digital democracy, conflict resolution, and journalistic ethics should be implemented to support consistent and rights-based law enforcement.

CONCLUSION

The provision in the Constitution regarding the legal protection for journalists in cases of defamation confirms that the journalistic work produced by Yundhi Satrya Siman, in the case of Palangka Raya District Court Decision Number 108/Pid.Sus/2019/PN Plk, is legitimate journalism. This is evidenced by the efforts to verify the information as well as providing the right to reply, in accordance with the Code of Ethics for Journalism. Therefore, this work is protected under Law No. 40 of 1999 concerning the Press. Thus, journalists who work in accordance with the provisions of the press law cannot be convicted using general criminal law instruments or the provisions of the Information and Electronic Transactions Law (ITE Law). A conflict of norms between the ITE Law and the Press Law arises because both laws address defamation using different approaches. The Press Law provides mechanisms for dispute settlement, including the right of reply, right of correction, and mediation by the Press Council, while the ITE Law imposes direct criminal penalties. In such a conflict of norms, the principle *lex specialis derogat legi generali* must be followed, meaning that the special provisions of the Press Law must take precedence over the general provisions of the ITE Law. The acquittal of Yundhi serves as concrete proof of the implementation of this principle and confirms that protecting press freedom should be prioritized.

Based on the findings of the research, steps need to be taken to strengthen legal protection for journalists. Harmonization of regulations is necessary to ensure that journalistic activities carried out in accordance with the code of ethics and implemented by officially registered press companies cannot be convicted under the ITE Law. Additionally, the 2017 Memorandum of Understanding between the Indonesian National Police and the Press Council must be strengthened to hold greater binding power, for example, through government regulations or a revision of the law. Law enforcement agencies also need to gain a deeper understanding of the principles of conflict resolution and press freedom, so that the criminalization of journalists can be prevented, and the role of the press as a pillar of democracy can be preserved.

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