Fulfillment of The Rights of a Wife Who is Not Nusyuz Post-Divorce in the Batusangkar Religious Court Class 1 B

Menyelesaikan Hak Istri yang Bukan Nusyuz Setelah Bercerai di Pengadilan Agama Batusangkar Kelas 1 B

Miftahul Jannah*)
UIN Mahmud Yunus Batusangkar, West Sumatra, Indonesia
E-mail: jnh.miftahul17@gmail.com

Hidayati Fitri
UIN Mahmud Yunus Batusangkar, West Sumatra, Indonesia
E-mail: hidayatifitri@uinmybatusangkar.ac.id

Roni Efendi
UIN Mahmud Yunus Batusangkar, West Sumatra, Indonesia
E-mail: Roniefendi@uinmybatusangkar.ac.id

Alexy Borly
Universidad Estatal Penínsulade Santa Elena, Ecuador
E-mail: alexyborly@gmail.com

*) Corresponding Author


Abstract: Supreme Court Circular No. 3 of 2018 explains that cases of contested divorces that do not provide guarantees for the wife's rights after divorce are systematically confirmed by SEMA No. 2 of 2019, which explains the timing of alimony payments. In the Batusangkar Religious Court in 2022, there were five decisions on divorce cases challenging non-Nusyuz wives, but two decisions granted maintenance while three
decisions did not grant them. Therefore, it is important to examine the legal considerations of judges when deciding divorce cases against non-Nusyuz wives and the considerations of judges when protecting the maintenance rights of non-Nusyuz wives at the Batusangkar Religious Court. The type of research is empirical legal research with a qualitative-descriptive approach. The judge's legal considerations in deciding contested divorce cases were that the fulfillment of the wife's post-divorce rights in the five contested divorce cases satisfied the formal and substantive legal aspects, although there were divergent opinions in the application of substantive law. The judge's consideration can be seen from the penalty paid before the defendant issued the divorce certificate and the defendant's financial ability, as well as the existence of a peace agreement between the plaintiff and the defendant. In cases where the payer of alimony is not determined for a wife who is not nusyuz after the divorce, the judge, on the other hand, takes into account that the defendant is financially unable, while in all cases the wording "can" is considered optional and is not interpreted as an optional imperative.

Keywords: Wife's Rights, Nusyus, Divorce

INTRODUCTION:

In 2022 at the Batusangkar Class IB Religious Court there will be 5 decisions on contested divorce cases where wives who are not nusyuz get their rights after divorce, however there are differences in the considerations of the panel of judges in applying SEMA No. 2 of 2019, namely in two decisions of the panel of judges applying SEMA No. 2 of 2019 by including the sentence "to be paid before the Defendant takes the divorce certificate" in the decision, while in three decisions the panel of judges did not apply SEMA No. 2 of 2019. Based on SEMA No. 3 of 2018 in cases of contested divorce, wives who are not nusyuz can get their rights after divorce, namely living 'iddah and mut'ah, which before the existence of SEMA, wives in cases of contested divorce could not get their rights after the divorce. SEMA No. 3 of 2018 was confirmed by the birth of SEMA No. 2 of 2019 which explains when to pay alimony, both of which are a form of legal protection for women's rights after divorce.

Previous studies on SEMA No. 2 of 2019 can be grouped into three categories. First, a study of the role of Religious Courts in implementing SEMA No. 2 of 2019 (Mahmudah, 2021) (Annisa, 2021) (Handayani, 2023). Second, a comparative analysis of cases in implementing SEMA No. 2 of 2019 (Fachrurozzy, 2022). Third, progressive law against SEMA No. 2 of 2019 (Afifah, 2023). Of the three trends in these studies, no one has specifically examined the legal considerations of judges and the considerations of the panel of judges in implementing SEMA No. 2 of 2019.

This study aims to answer the implementation of SEMA No. 2 of 2019 in the Religious Courts. To answer this, this research seeks to find out how the judge's legal considerations in deciding a contested divorce case fulfill the rights of the wife who is not nusyuz after the divorce and the judge's considerations in implementing the Supreme Court Circular Letter Number 2 of 2019 at the Batusangkar Class IB Religious Court.
This study is important to carry out considering 4 things. First, several studies explain the implementation of SEMA No. 2 of 2019 in the Religious Courts. Second, there is a lack of protection of women's rights after divorce. Third, many wives in contested divorce cases do not receive their rights after the divorce. Fourth, the lack of role of the Religious Courts in providing legal protection for women's rights after divorce.

METHOD:
This research is empirical juridical research using a qualitative descriptive approach. In this case, the law that must be applied is to apply SEMA No. 2 of 2019 at the Batusangkar Class IB Religious Court. The data sources used in this research are primary data sources, namely the Chair of the Religious Court and Judges of the Batusangkar Class IB Religious Court, and secondary data sources which are divided into 2, namely primary legal material sources, namely the Al-Qur'an, Sunnah, the 1945 Constitution, the Marriage Law, KHI and SEMA No. 3 of 2018 and SEMA No. 2 of 2019 and secondary sources of legal material, namely Government Regulation Number 9 of 1975 concerning the Implementation of Law Number 1 of 1974 concerning Marriage. The data collection techniques used in this research were interviews conducted with the Chair of the Religious Court and Judges of the Batusangkar Class IB Religious Court and document studies, namely five decisions in contested divorce cases that fulfilled the rights of wives who were not nusyuz after divorce. The data analysis techniques used are data reduction, data presentation, and concluding/verification. The technique for ensuring the validity of the data used in this research is the source triangulation technique (Farhan et al., 2020).

RESULTS AND DISCUSSION:

1. Judge's Legal Considerations in Deciding Divorce Cases in Which the Wife's Rights Are Fulfilled Post-Divorce in the Batusangkar Class IB Religious Court
In applying formal law, the panel of judges in five contested divorce cases in which the rights of wives who were not nusyuz after divorce were fulfilled, the implementation was by applicable regulations. In general, the examination of divorce cases in the Religious Courts is the same as in civil procedural law. In divorce cases, such as contested divorce, the judge is obliged to reconcile the two parties involved at each trial. If both parties are present at the trial, mediation continues. In civil cases, in general, at the start of each trial, before examining the case, the judge is obliged to seek peace between the parties to the case and if there is no peace then proceed with mediation. If there is no peace during the mediation process, then the trial will continue (Efendi, 2020).

If the plaintiff states that there have been changes or additions to his claim, then this can simply be stated in the minutes, while the main claim in the case file remains in its original condition before the changes or additions occurred. Then the defendant is allowed to submit his answer either in writing or orally. Then after the answer, there are replicas and duplicates followed by proof. In the evidence, the plaintiff and defendant presented documentary evidence and witnesses in turns arranged by the judge. After the evidence continues with the conclusion and finally the reading of the verdict.

In applying material law to five contested divorce cases in which the rights of wives who were not nusyuz were fulfilled after there were differences in the panel of judges in its application, namely:

- Case Number: 19/Pdt.G/2022/PA.Bsk
In this case, the Panel of Judges handed down a decision to the Defendant to impose one ba'in sughra divorce on the Plaintiff because the Plaintiff's household and the Defendant were no longer in harmony and harmony because disputes and quarrels often occurred (PP No. 9 of 1975, KHI and Jurisprudence). So that the goal of marriage cannot be achieved (Marriage Law, KHI and QS. Ar-Rum Verse 21). By the rules of fiqh rejecting harm is better than maintaining goodness.

The panel of judges handed down a decision to sentence the Defendant to pay iddah and mut'ah maintenance. In its considerations, the Panel of Judges referred to SEMA No. 3 of 2018. Based on PERMA No. 3 of 2017 to provide legal protection for women's rights after divorce, the Panel of Judges sentenced the Defendant to pay a peace agreement in the form of iddah and mut'ah maintenance to the Plaintiff before the Defendant took out the Divorce Deed, this refers to SEMA No. 2 of 2019.

b. Case Number: 478/Pdt.G/2022/PA.Bsk

In this case, the Panel of Judges handed down a decision to the Defendant to impose one ba'in sughra divorce on the Plaintiff because the Plaintiff's household and the Defendant were no longer in harmony and harmony because there were frequent disputes and quarrels (PP No. 9 of 1975 and KHI). So that the goal of marriage cannot be achieved (Marriage Law and KHI). By the rules of Islamic jurisprudence, a wife may demand a divorce from a judge if she admits that she has always received painful treatment from her husband so that this can hinder the continuity of the husband and wife relationship two them, and that rejecting harm is better than maintaining goodness. The panel of judges handed down a decision to sentence the Defendant to pay iddah and mut'ah support, this refers to SEMA No. 3 of 2018.

c. Case Number: 13/Pdt.G/2022/PA.Bsk

In this case, the Panel of Judges handed down a decision to the Defendant to impose one ba'in sughra divorce on the Plaintiff because the Plaintiff's household and the Defendant were no longer in harmony and harmony because there were frequent disputes and quarrels (PP No. 9 of 1975 and KHI). So that the goal of marriage cannot be achieved (Marriage Law and KHI). By the rules of Islamic jurisprudence, harm must be eliminated. The panel of judges handed down a decision to sentence the Defendant to pay iddah support to the Plaintiff no later than before the Defendant took out his Divorce Deed, this refers to SEMA No. 2 of 2019.

d. Case Number: 345/Pdt.G/2022/PA.Bsk

In this case, the Panel of Judges handed down a decision to the Defendant to impose one ba'in sughra divorce on the Plaintiff because the Plaintiff's household and the Defendant were no longer in harmony and harmony because there were frequent disputes and quarrels (PP No. 9 of 1975 and KHI). So that the goal of marriage cannot be achieved (Marriage Law and KHI). By the rules of jurisprudence, harm must be eliminated. The panel of judges handed down a decision to sentence the Defendant to pay iddah and mut'ah support, this refers to SEMA No. 3 of 2018.

e. Case Number: 406/Pdt.G/2022/PA.Bsk
In this case, the Panel of Judges handed down a decision to the Defendant to impose one ba'in sughra divorce on the Plaintiff because the Plaintiff's household and the Defendant were no longer in harmony and harmony because there were frequent disputes and quarrels (PP No. 9 of 1975 and KHI). So that the goal of marriage cannot be achieved (Marriage Law and KHI). By the rules of jurisprudence, harm must be eliminated... The panel of judges handed down a decision to sentence the Defendant to pay iddah and mut'ah support, this refers to SEMA No. 3 of 2018.

Based on the results of interviews conducted by researchers, the factors that cause many wives in contested divorce cases to not fulfill their rights after divorce are:

a. The wife has no education and does not understand the law.
b. The wife is worried about her husband's threat, the wife is already afraid of filing for divorce, let alone filing a lawsuit for post-divorce maintenance.
c. During marriage, the husband does not have a job or income, so the wife is the one who provides support during the marriage.
d. The wife does not want to file a claim for post-divorce maintenance because the most important thing for her is that the divorce is enough.

Based on the results of interviews conducted by researchers, the efforts made by the Batusangkar Religious Court so that wives in contested divorce cases obtain post-divorce rights, namely:

a. The Chairman of the Court gave directions to the Legal Services Post (POSYANKUM) to convey to women who file divorce lawsuits that they have the right to file claims regarding women's rights after divorce, this is by Article 143 Rbg that the chairman of the court has the authority to provide advice or assistance law to the Plaintiff or his attorney in filing a lawsuit.
b. The court provides information about women's rights after divorce which can be seen on the website and social media of the Batusangkar Religious Court as well as brochures and banners about women's rights after divorce in the waiting room of the Batusangkar Religious Court.
c. When a marriage breaks up due to divorce, the husband must provide support to his wife because, during the 'iddah period, the wife is not allowed to marry another man. Psychologically, wives are more fragile after a divorce, so it is very appropriate in the marriage legal system in Indonesia that if a husband divorces his wife, the husband must pay a certain amount of money in the form of providing maintenance, mask and kiswah (Ja’far, 2021).

Based on Article 149 letter b KHI, if a marriage breaks down due to a divorce, there is no obligation for the husband to pay alimony to his wife because the wife has been sentenced to talaq ba'in. Based on a fiqh perspective, regarding the burden of maintenance for wives who are sentenced to talaq ba'in, the scholars have different opinions, namely:

a. According to Abu Hanifah, the obligation to support a wife who has been subject to talak raj'i or talak ba'in is entitled to receive support and a place to live from her husband as long as the wife does not leave the place of residence provided by her husband. The husband is obliged to provide for her and the maintenance is considered a legal debt, which is calculated from the date of divorce. The husband's responsibility does not depend on the willingness of both parties or the
judge's decision. The ex-husband’s debt to provide maintenance cannot be discharged unless it is fulfilled by the husband or released by the wife.

b. Imam Ahmad, Zahiriyyah, Ishaq, and Abu Tsaur are of the opinion that a wife who is given talaq ba'in does not get the right to support and a place to live even if she is pregnant. Because living and housing are required as compensation for reconciliation for the husband, whereas in talak ba'in the husband does not have the right to reconciliation. Therefore there are no living and living facilities (Az-Zuhaili, 2013).

c. Imam Syafi’i, Imam Malik, and the majority of Salaf ulama are of the opinion that wives have the right to a place to live no matter the circumstances. However, she does not get a living, unless she is pregnant (Az-Zuhaili, 2013).

As thinking on this issue develops, providing support from husbands to wives after divorce in cases of contested divorce is considered very necessary considering that in reality, the wife is not nusyuz but she is the one who is injured and to survive she does not have certainty from her husband so she dares to go to the Religious Court to ask for legal protection (Alhaqni et al., 2023). After the publication of SEMA No. 3 of 2018 and SEMA No. 2 of 2019, which aims to provide legal protection for women’s rights after divorce (Elimartati et al., 2021). Then, with an explanation of when it is time for the husband to pay off the wife’s rights as mentioned in SEMA No. 2 of 2019 will further protect women's rights after divorce, especially in contested divorce cases.

SEMA No. 3 of 2018 and SEMA No. 2 of 2019 is an accommodation to PERMA No. 3 of 2017 concerning Guidelines for Trying Women's Cases in Conflict with the Law. The birth of PERMA strengthens that all people are equal before the law and legislation prohibits discrimination and guarantees equal protection for all people from discrimination based on any reason, including sex or gender (Istiqomah et al., 2022).

Women and children are the parties who feel the consequences of divorce the most because they are vulnerable groups that require special protection by law. Based on a review of several Religious Court decisions, only a small number include dictums regarding the consequences of divorce, so the rights of women and children after divorce tend to be less protected (Andryan et al., 2023). The implementation of decisions regarding the consequences of divorce is also not effective because the procedure is long and costs a lot of money. Therefore, strategic steps are needed in seeking to protect the rights of women and children in the form of a policy brief that can be implemented by the Directorate General of Religious Courts, the Supreme Court, and stakeholders regarding the protection...
of the rights of women and children after divorce.

Of the five contested divorce cases in which the rights of wives who were not nusyuz were fulfilled after the divorce, there were 2 or two decisions implementing SEMA No. 2 of 2019, the judge's considerations are:

a. From the Defendant's job, he is considered to have a steady income and is financially capable.

b. The Defendant always attends every stage of the trial so that the panel of judges considers the Defendant to have good faith in carrying out the decision.

c. There is a peace agreement between Plaintiff and Defendant during mediation which requires Defendant to pay post-divorce maintenance to Plaintiff before taking the divorce certificate, so the panel of judges is obliged to include this agreement in the decision.

Meanwhile, of the 5 contested divorce cases where the rights of wives who were not nusyuz were fulfilled after the divorce, three decisions did not apply SEMA No. 2 of 2019, the judge's considerations are:

a. The Defendant's job is considered to not have a steady income and is financially capable.

b. After the mediation process, the Defendant never again attended any stage of the trial, so the panel of judges considered that the Defendant did not have good faith in carrying out the decision.

c. The presence of the word "can" is understood by the judge as something that is not mandatory.

Of the 5 contested divorce cases in which the rights of wives who are not nusyuz are fulfilled, it can be seen that the execution is as follows:

a. Case Number 19/Pdt.G/2022/PA.Bsk

In this case, in their decision the panel of judges sentenced the Defendant to pay a peace agreement in the form of iddah and mut'ah maintenance to the Plaintiff before taking the divorce certificate before before the Defendant took out his Divorce Deed, this refers to SEMA No. 2 of 2019. In its execution, Defendant had taken a divorce certificate and this meant that Defendant had also paid iddah and mut'ah maintenance to Plaintiff. This means that women's rights are protected and fulfilled after divorce.

b. Case Number 478/Pdt.G/2022/PA.Bsk

In this case, in their decision, the panel of judges sentenced the Defendant to pay a peace agreement in the form of iddah maintenance to the Plaintiff no later than before the Defendant took out his Divorce Deed, this refers to SEMA No. 2 of 2019. In its execution, Defendant had not taken the divorce certificate and this meant that Defendant had not paid the iddah and mut'ah maintenance to Plaintiff. This means that women's rights are protected but their rights after divorce are not fulfilled.

c. Case Number 13/Pdt.G/2022/PA.Bsk

In this case, in its decision, the panel of judges sentenced the Defendant to pay a peace agreement in the form of iddah and mut'ah living which in this decision the panel of judges did not apply SEMA No. 2 of 2019. In its execution, Defendant had not taken the divorce certificate and this meant that Defendant had not paid the iddah and mut'ah maintenance to Plaintiff. This means that women's rights after divorce have not been protected and fulfilled.

d. Case Number 345/Pdt.G/2022/PA.Bsk

In this case, in its decision, the panel of judges sentenced the Defendant to pay a peace agreement in
the form of iddah and mut'ah living which in this decision the panel of judges did not apply SEMA No. 2 of 2019. In its execution, Defendant had not taken the divorce certificate and this meant that Defendant had not paid the iddah and mut'ah maintenance to Plaintiff. This means that women's rights after divorce have not been protected and fulfilled.

e. Case Number 406/Pdt.G/2022/PA.Bsk

In this case, in its decision, the panel of judges sentenced the Defendant to pay a peace agreement in the form of iddah and mut'ah living which in this decision the panel of judges did not apply SEMA No. 2 of 2019. In its execution, Defendant had taken a divorce certificate and this meant that Defendant had also paid iddah and mut'ah maintenance to Plaintiff. This means that women's rights after divorce have not been protected but have been fulfilled.

In these 3 decisions, not adding the sentence that payment was made before the Defendant took the divorce certificate in the decision was not a violation. Because if it is not narrated in the posita and petitum of the lawsuit by the Plaintiff, then there is no obligation for the judge to add the order "to be paid before the Defendant takes the divorce certificate" to the Decision. In civil cases, judges are passive and cannot violate the principle of ultra petita.

In SEMA No. 2 of 2019, there is a word can which the judge understands as something that is not mandatory, meaning it may be applied and may not be applied. So not applying this SEMA in these 3 decisions by not adding the sentence that was paid before the Defendant took the divorce certificate in the decision has no consequences because SEMA is only advice, it is only advice, not a requirement to be implemented. So that there is no violation for judges if they do not apply SEMA No. 2 of 2019, however, complying with it is only a guideline for judges in applying the law and judges also have arguments in deciding a case from the agreement between the Plaintiff and the Defendant regarding the payment of post-divorce support obligations so that the judge applies SEMA No. 2 of 2019. 2 of 2019.

The downside of SEMA No. 2 of 2019 is that there are no sanctions or binding laws given to the defendant for not carrying out their obligations (Kurniawan et al., 2022). Apart from that, the explanation regarding the time for payment of women's rights after divorce in SEMA is also not clear because it can only add a sentence that is paid before the defendant takes the divorce certificate. The word can here means it can be implemented and it may or may not be implemented. Supposedly, if there are regulations that bind someone to implement a rule, then it must be accompanied by sanctions if the person violates it. If no sanctions are given, then the rules are not strong or not binding enough (Sayulina & Efendi, 2022)

Based on SEMA No. 2 of 2019, the Defendant will only not get a divorce certificate if he does not carry out his obligations. If the Defendant needs a divorce certificate, he is forced to pay it and if the Defendant does not need a divorce certificate, then of course he will not pay it and underestimate his obligations. This means that, indirectly, it is only binding on defendants who need a divorce certificate. The Defendant's self-awareness is difficult. When the Defendant does not need the divorce certificate, he does not want to provide his obligations to the Plaintiff.
The aim of law is none other than to bring about justice. The law aims at three aspects, namely certainty, usefulness, and justice. This is the right idea that to create justice, certainty, and usefulness will automatically be realized because both usefulness and certainty are part of justice itself (Efendi, 2019). In their decisions, judges must be oriented toward legal justice, moral justice, and social justice. Article 2 PERMA No. 3 of 2017 concerning Guidelines for Trying Women in Conflict with the Law, judges in trying women in conflict with the law are based on the principles of respect for human dignity, non-discrimination, gender equality, equality before the law, justice, expediency, and legal certainty. Thus, decisions taken must reflect a sense of justice, and legal certainty and contain benefits.

a. Legal certainty

Inside SEMA No. 2 of 2019, there is legal certainty, namely that it states that the time for payment of the husband's obligations to the wife after the divorce is explained, namely before the Defendant takes the divorce certificate. However, there is no coercion in it that could result in stricter punishment for the ex-husband. The punishment is that the ex-husband simply cannot take out the divorce certificate before paying his obligations to his ex-wife.

b. Expediency

The law must be able to provide the greatest benefit and happiness for society. In this case, if the ex-husband wants to get married, he will need a divorce certificate so that the marriage can be registered and valid in the eyes of the law. Therefore, for the ex-husband, the divorce certificate is very useful when he wants to remarry. The benefits and happiness for the ex-wife are the fulfillment of her post-divorce rights, namely 'iddah and mut'ah maintenance when her ex-husband needs a divorce certificate.

However, if the ex-husband does not need a divorce certificate, then there is no legal benefit and no happiness will be obtained for the ex-wife because she will not get her post-divorce rights if she demands it. Apart from that, because there are no stricter sanctions given to ex-husbands who do not pay their wife's rights after divorce, in this case, there are no legal benefits for husbands who do not need a divorce certificate.

c. Justice

Justice will only be obtained if the rights and obligations between the ex-husband and ex-wife have been fulfilled, then that is a form of justice. In this case, justice exists only for the ex-husband who needs a divorce certificate and then he pays his obligations to his ex-wife. Meanwhile, an ex-husband who does not need a divorce certificate will be underestimating his ex-wife's rights. Therefore, justice will be obtained if there are stricter and coercive sanctions such as imprisonment for ex-husbands.

Based on the results of interviews conducted by researchers, if SEMA No. 2 of 2019 is linked to legal protection for women's rights after divorce and women who are married in an unregistered marriage because the Defendant has not taken a divorce certificate, then these 2 things cannot be linked. Law enforcement in protecting women's rights after divorce is a must. Based on the five cases above, these rights are the result of an agreement between the Plaintiff and the Defendant. If it is stated in the posita and petitum to be paid before the Defendant takes the divorce certificate, the consequence is that
the Defendant's divorce certificate will be withheld if he has not paid his ex-wife's rights. Meanwhile, if both of them do not agree on "withholding the divorce certificate", SEMA also does not force the implementation of the detention of the divorce certificate as long as the Plaintiff does not explain it in the posita and petite of the lawsuit.

If it is linked to the increase in unregistered marriages, then this is a deliberate violation that cannot be tolerated. The defendant must first pay his ex-wife's rights, then obtain a divorce certificate, so that he can marry another person officially and on record. Law enforcement and protection of women's rights after divorce cannot possibly be weakened to prevent violations of unregistered marriages.

CONCLUSION

The judge's legal considerations in deciding contested divorce cases where the wife's post-divorce rights were fulfilled at the Batusangkar Class IB Religious Court in 5 (five) contested divorce cases can be said to be that the formal law has been fulfilled and the material law has also been fulfilled even though there are differences in application. material law, but this is not something that can result in the decision being considered legally flawed. The judge's considerations in implementing Supreme Court Circular Letter Number 2 of 2019 at the Batusangkar Class IB Religious Court are the judge's considerations in cases that include a sentence that is paid before the Defendant takes the divorce certificate, namely the Defendant's job which is considered to have a steady income and is financially capable, the Defendant always attend every stage of the trial and there is a peace agreement between the Plaintiff and the Defendant. Meanwhile, what was taken into consideration by the judge in cases that did not include a sentence that was paid before the Defendant took the divorce certificate was that the Defendant's job was deemed to not have a steady income and the Defendant was financially incapable. After the mediation process, the Defendant never again attended any stage of the trial and in SEMA there was The word "can" is understood by the judge as something that is not mandatory.

This research found that the judge's legal considerations were by procedural law in religious courts, namely formal law and material law, and the judge's considerations had achieved legal protection for women's rights after divorce. Contribute to the development of legal protection for women's rights after divorce. This research is only limited to the legal considerations of judges and judges' considerations, so it is necessary to conduct further research related to SEMA No. 2 of 2019 which is still ambiguous to understand about legal protection for women's rights after divorce.

REFERENCE:


MENURUT SEMA NO 2 TAHUN 2019
(Studi Kasus Pengadilan Agama
Banyuwangi).

Sayulina, R., & Efendi, R. (2022). The
Criminal Law Reform On Completion Of
Samenleven In Indonesia. AGENDA:
Jurnal Analisis Gender Dan Agama, 4(1),
42–53.