

Legal and Ethical Interpretation of Blasphemy Cases in Indonesia: A *Ma'na-cum-Maghza* Perspective

Irwan Ahmad Akbar,* M. Zainuddin,* Achmad Khudori Soleh,*

* State Islamic University of Maulana Malik Ibrahim Malang, Indonesia

Email: *wawan.abmad7@gmail.com*

Abstract: The phenomenon of religious blasphemy cases in Indonesia, including the cases of Sukmawati and Meiliana, which are the focal points of this study, has raised concerns and garnered serious attention, even from academics. Accusations in cases of religious blasphemy are almost invariably based on interpretations of QS. al-Tauba [9]: 64-66. Therefore, this article aims to explore the alignment between these cases and the meanings contained within QS. al-Tauba [9]: 64-66 from legal and ethical perspectives. The data in this article are based on legal documents, books of Quranic exegesis, academic journal articles, reports from Human Rights Watch, and several national online news sources. Data collection techniques involved literature studies and case observations via the internet. The blasphemy cases accused against Sukmawati and Meiliana are described within the context of Indonesian law and analyzed using the *ma'na-cum-maghza* theory. This article concludes that the actions taken by Sukmawati and Meiliana were wrong and unethical. However, their actions cannot be categorized as criminal offenses. Based on the analysis of QS. al-Tauba [9]: 64-65, blasphemy does not fall into the category of criminal acts, but rather an ethical violation whose legal sanctions are in the hands of God, not humans. Thus, this article offers a new perspective on the interpretation and understanding of the term blasphemy.

Keywords: *religious blasphemy; legal interpretation; hermeneutics; ma'na-cum-maghza; significance*

Abstrak: Kasus penistaan agama yang banyak terjadi di Indonesia, termasuk kasus Sukmawati dan Meiliana yang menjadi fokus kajian ini, telah menimbulkan kekhawatiran dan mendapatkan perhatian serius, bahkan dari akademisi. Tuduhan terhadap kasus penistaan agama tersebut hampir selalu didasarkan pada hasil penafsiran atas QS. al-Tauba [9]: 64-66. Oleh karena itu, artikel ini bertujuan untuk mengeksplorasi kesesuaian antara kasus-kasus tersebut dengan makna yang terkandung dalam QS. al-Tauba [9]: 64-66 dari sudut pandang hukum dan etik. Data-data dalam artikel ini didasarkan pada dokumen hukum, kitab-kitab tafsir Al-Quran, artikel jurnal, laporan organisasi Human Right Watch dan beberapa sumber berita daring nasional. Teknik pengumpulan data dilakukan melalui studi literatur dan observasi kasus melalui internet. Kasus penistaan agama yang

dituduhkan kepada Sukmawati dan Meiliana dideskripsikan dalam konteks hukum Indonesia dan dianalisis menggunakan teori ma'nacum-maghza. Artikel ini menyimpulkan bahwa apa yang dilakukan oleh Sukmawati dan Meiliana merupakan suatu tindakan yang salah dan tidak beretika. Namun demikian, tindakan keduanya tidaklah bisa dikategorikan sebagai tindakan pidana. Sebab, berdasarkan analisis atas QS. al-Tauba [9]: 64-65, penistaan agama tidaklah masuk kategori tindakan pidana, melainkan sebuah pelanggaran etika yang sanksi hukumnya berada di tangan Tuhan, bukan manusia. Dengan demikian, artikel ini memberikan perspektif baru terkait penafsiran dan pemahaman terhadap istilah penistaan agama.

Kata kunci: *penistaan agama; pnafsiran hukum; hermeneutika; ma'na-cum-maghza; signifikansi*

Introduction

Religious blasphemy cases have become a significant societal concern, warranting scholarly attention. Meiliana and Sukmawati are two notable individuals involved in such cases. In late July 2016, Meiliana became involved in an incident that began with her request to the mosque near her residence in Tanjungbalai to lower the volume of the call to prayer (*aḥzan*).¹ She was charged with religious blasphemy and sentenced to 18 months in prison. Hence, on November 11, 2019, Sukmawati Soekarnoputri recited a poem that compared Prophet Muhammad with Sukarno, in an event aimed at fostering nationalism and combating radicalism and terrorism.² Sukmawati apologized for similar accusations in 2018. Meanwhile, in Indonesia, Law no. 1/PNPS/1965 prohibits deviations from recognized religious teachings. This legislation has led to the persecution of groups like the Ahmadiyya, causing social unrest. Extremist Islamic factions,

¹ Faizal, Risdianto, Sumarlam., and Noor. Malihah, "The Representation of Power in the Text News on the Meiliana Case (A Norman Fairclough Critical Discourse Analysis)," *Advances in Social Sciences, Education and Humanities Research* 280, no. Basa (2018): 234–45.

² Dyah Nurindra, Prahastiwi Utari, and Sudarmo Sudarmo, "Roland Barthes's Semiotic Analysis: Islamic Anti-Radicalism Message to Raise Indonesia Reconciliation by Sukmawati Soekarnoputri," in *The Proceedings of the 4th International Conference of Social Science and Education, ICSSSED 2020, August 4-5 2020, Yogyakarta, Indonesia* (EAI, 2020), <https://doi.org/10.4108/eai.4-8-2020.2302417>.

supported by the Indonesian Ulama Council (MUI), consider these beliefs heretical.³

Before the cases of Meiliana and Sukmawati, there was a blasphemy case involving Basuki Cahya Purnama (Ahok), the former Governor of Jakarta, in 2016.⁴ Ahok made a controversial statement during his speech in the Thousand Islands, which was deemed as blasphemy by certain groups in society.⁵ This case sparked waves of protests and large-scale demonstrations, drawing international attention and ultimately resulting in Ahok being sentenced to prison.⁶

The blasphemy law in Indonesia has been the subject of extensive research and analysis. Several scholars have highlighted this issue from various perspectives. Fenwick argues that the enforcement of Islamic principles contradicts the country's liberal constitution, providing insights into the role of religion in the development of democracy in the world's largest Muslim nation.⁷ Other studies conducted by Huda discuss the increasing religious conflicts and intolerance in Indonesia post-Suharto.⁸ These findings are supported by Hasan's research, which identifies the complexities and challenges faced by Indonesia in managing religious diversity and protecting minority religions.⁹ Therefore, these studies suggest the need for the

³ Eva Achjani Zulfa, "Restorative Justice for Blasphemy in Indonesia: Study on the Application of the PNPM Law No. 1 of 1965," *International Journal of Science and Society* 1, no. 4 (December 12, 2019): 54–62, <https://doi.org/10.54783/ijisoc.v1i4.159>.

⁴ Peter Richardson et al., "Blasphemy and Persecution: Positioning in an Inter-Religious Discussion," ed. Tim Lindsey and Helen Pausacker, *Text & Talk* 40, no. 1 (January 2020): 75–98, <https://doi.org/10.1515/text-2019-2049>.

⁵ Adam Tyson, "Blasphemy and Judicial Legitimacy in Indonesia," *Politics and Religion* 14, no. 1 (March 11, 2021): 182–205, <https://doi.org/10.1017/S1755048319000427>.

⁶ Iswandi Syahputra, "Activities on Twitter and the 212 Defend Islam Rally through the Perspective of the Indonesian Ulema Council," *Al-Jami'ab* 58, no. 2 (2020): 323–54, <https://doi.org/10.14421/ajis.2020.582.323-354>.

⁷ Fenwick, Stewart. *Blasphemy, Islam and the state: Pluralism and liberalism in Indonesia*. Routledge, 2016.

⁸ Huda, M. Syamsul. "The local construction of religious blasphemy in East Java." *JIS-Journal of Indonesian Islam* 13.1 (2019): 69-114.

⁹ Hasan, Noorhaidi. "Religious diversity and blasphemy law: Understanding growing religious conflict and intolerance in post-Suharto Indonesia." *Al-Jami'ab: Journal of Islamic Studies* 55.1 (2017): 105-126.

enforcement of blasphemy laws.¹⁰ Other research suggests that blasphemy as a punishable crime is related to political calculations and electoral opportunities. The trial of blasphemy cases becomes further complicated by the fact that religious authorities and Islamic mass organizations in Indonesia have a significant influence over the judicial process.¹¹ This situation often results in minority groups becoming victims of blasphemy laws when their beliefs or practices disturb the majority religion.¹²

Accusations in various blasphemy cases that have occurred in Indonesia are almost always based on the interpretation of QS. al-Tauba [9]: 64-66. Therefore, this research aims to find the compatibility between the blasphemy case of Sukmawati and Meiliana with the significance of QS. al-Tauba [9]: 64-66. This study examines religious blasphemy cases in Indonesia using a multi-method approach: analyzing Indonesia's blasphemy law through digital archives, reviewing Quranic exegesis and scholarly articles for contextual understanding, reading national online news reports and assessing international viewpoints via Human Rights Watch reports. These methods provide a comprehensive analysis within broader legal and ethical frameworks. In this case, first, the author will briefly analyze the Meiliana and Sukmawati cases in the context of Indonesian law. It is attempted to find out its suitability with the significance of QS. al-Tauba [9]: 64-66. Based on that, second, the author will briefly investigate the significance of those verses by employing the *ma'na-cum-maghza* theory proposed by Sahiron. *Ma'na-cum-maghza* is a hermeneutical approach to grasp the significance (*maghza*) by investigating the original meaning of a text that was understood by its first audience. That way, the author will examine the contextualization of QS. al-Tauba [9]: 64-66 with the Sukmawati and Meiliana cases. It could assist the author in elaborating the contextual relationship between the Meiliana and Sukmawati cases and the significance of the verse.

¹⁰Telle, Kari. "Faith on trial: Blasphemy and 'lawfare' in Indonesia." *Ethnos* 83.2 (2018): 371-391.

¹¹Tyson, Adam. "Blasphemy and judicial legitimacy in Indonesia." *Politics and Religion* 14.1 (2021): 182-205.

¹²Crouch, Melissa. "Indonesia's blasphemy law: Bleak outlook for minority religions." (2012).

***Istihzā'* in QS. al-Tauba [9]: 64-66 as Blasphemy?: The Interpreter Scholars and Islamic Jurists' Perspectives**

This section aims to examine the perspectives of classical and modern scholars on the interpretation of QS al-Tauba [9]: 64-66. The typology of both classical and modern scholars will be described to gain a comprehensive understanding of these verses. Subsequently, the discussion will focus on the application of this passage in the context of Islamic criminal law, as explored by Islamic jurists. Through this analysis, valuable insights will be provided regarding the comprehension and implications of the aforementioned verses within the framework of Islamic jurisprudence. QS. al-Taubah [9]: 64-66 stated:

The hypocrites are afraid that a Surah might be revealed disclosing what is hidden in their hearts. Say to them, "Continue mocking (Allah and His Messenger)." Indeed, Allah will reveal what you fear (64).

And if you ask them (about what they have done), they would certainly answer, "We were just joking and playing around." Say, "Is it Allah, His signs, and His Messenger that you are mocking?" (65).

You do not need to apologize, for you have disbelieved after having believed. If We forgive a group among you (because they repented), We will surely punish the others, for they are always committing sins (66).

The QS. al-Tauba (9): 64-66 are in group 61-69 verses with the theme of threats to grumblers and hypocrites.¹³ The position of QS. al-Tauba [9]: 64-66 is in the group which generally explains its relation to the reluctance of hypocrites in fighting on the side of the Prophet Muhammad. They even grumbled to each other and ridiculed the Prophet's efforts, so that they received threats and censure from God.¹⁴ Thus, QS. al-Tauba (9): 64-66 addresses the issue of hypocrites who were hesitant to fight alongside Prophet Muhammad. These verses serve as a warning and reprimand from God towards those individuals.

¹³ Elwood Morris, *A Comprehensive Commentary on The Quran* (London: Trubner & Co., Ludgate Hill, 1885).

¹⁴ Quraish Shihab, *Tafsir Al-Misbah* (Tangerang: Lentera Hati, 2005).

Traditional Islamic scholars hold diverse perspectives regarding the exegesis of verses QS. al-Tauba (9): 64-66 in the Quran. Abu Hayyan al-Andalusi and at-Tabataba'i argued that the verses were revealed at the time of the Tabuk Expedition.¹⁵ According to al-Razi, insulting any religious symbols is forbidden based on QS. al-An'am [6]: 108. He assumes the verse talks about an appeal for preachers to be more careful in preaching.¹⁶ QS. al-Tauba (9): 64-66 warns against the behavior of grumblers and hypocrites who opposed Prophet Muhammad. These verses were revealed during the Tabuk Expedition, and they highlight the need for caution in preaching and the prohibition of insulting religious symbols.

Related to the point of classical scholars on QS. al-Tauba (9): 64, there are three typologies of interpretation, namely: a) those who generally understand that hypocrites were apprehensive if their secrets will be exposed;¹⁷ b) those who understand that hypocrites couldn't be apprehensive, so their fear is in the context of *istihza'* (ridicule), then the interpretation becomes "hypocrites pretend to be apprehensive"; and c) those who interpreted it as a form of the command (*amr*), so the interpretation becomes "let the hypocrites be apprehensive."¹⁸ Regarding the group of hypocrites who are referred to as infidels (*Kāfir 'Inād*), namely those who do not receive forgiveness from God because of their banter.¹⁹

Next on QS. al-Tauba [9]: 65-66, these verses are about the character of the hypocrites who ridiculed the Prophet and his Lord and

¹⁵ Abū 'Abdillāh Muḥammad ibn Yūsuf al-Andalusī, *Al-Taḥṣīn al-Kabīr al-Musammā Al-Baḥr al-Muḥīṭ* (Beirut: Dār al-Turāṭ, n.d.). Sayyid Muḥammad Ḥusain aṭ-Ṭabāṭabā'ī, *Al-Miṣbāḥ fī Taḥṣīn al-Qur'ān* (Beirut: Mu'assasah al-'Alam li al-Maṭbū'āt, 1997).

¹⁶ Fakhrud-Dīn Abū 'Abdillāh Muḥammad ibn 'Umar al-Rāzī, *Mafāṭīḥ al-Ghaib*, ed. Muḥammad 'Alī Baidlawī (Beirut: Dār al-Kutub al-'Ilmiyyah, 2004).

¹⁷ It was noted by al-Qurṭubī, al-Māwardī, and al-Baidawī. See: Abu al-Ḥasan 'Alī ibn Muḥammad Ibn Ḥabīb, *Tafsīr al-Māwardī* (Beirut: Dār al-Kutub al-'Ilmiyyah, n.d.); Al-Qurṭubī dan Abū 'Abdillāh Muḥammad ibn Aḥmad al-Khazrajī, *Al-Jāmi' li Aḥkām al-Qur'ān*, juz 10 (Beirut: Dār al-Fikr al-'Arabiyy, 1993).

¹⁸ Muḥammad al-Ṭāhir ibn 'Āshur, *Al-Taḥrīr wa al-Tanwīr* (Tunis: Dār Ṣaḥnūn, n.d.).

¹⁹ It was noted by al-Zajjaj and al-Nisfī. See: Abdullah ibn Aḥmad ibn Maḥmūd Al-Nisfī, *Tafsīr al-Nisfī* (Damaskus: Dār al-Kalām aṭ-Ṭayyib, 1998).

liked to excuse their mistakes.²⁰ As a result, they were considered infidels, so they were threatened that they will not receive God's forgiveness (*Kāfir 'Inād*). In the presentation, most Muslim scholars explained the context aspect regarding the actions of the hypocrites who belittled the Prophet when they went to Tabuk with insulting narrations.

Al-Qurthubi stated that most Muslim scholars argued *Kāfir Dzimmī* who insult, criticize, or degrade the position of the Prophet or characterize him as something should be killed.²¹ Contrary to Hanifa and al-Thauri differed that *Kāfir Dzimmī* should not be killed, because their *shirk* was greater than all.²² But still, they must be given *ta'zīr* (punishment). How about Muslim blasphemers?

According to Ibn al-Taimiyya, Muslim blasphemers are infidels and are killed without any difference opinion. It is consensus in four *madhab* and others. It is stated by Ishāq that Qāḍī 'Iyād argued those who criticize God from among the Muslims are infidels. He quoted Malik's opinion that Muslim blasphemers must be killed without repentance.²³ As Aḥmad ibn Ḥanbal argued anyone who criticizes the Prophet or disparages him, whether they were a Muslim or not, must be killed.²⁴

Meanwhile, "modern Islamic scholars" hold varying opinions regarding the interpretation of Quranic verses 9: 64-66. Some scholars argue against the punishment of individuals who commit religious blasphemy, while others maintain that they should face legal consequences. One scholar who advocates against the punishment for

²⁰ Abū Ja'far Muḥammad ibn Jarīr al-Ṭabarī, *Jami' al-Bayān 'an Ta'wil Āy al-Qur'an*, ed. Maḥmūd Muḥammad Shākir (Aleppo: Dār al-Ma'ārif, n.d.).

²¹ Shamsud-Dīn Muḥammad ibn Aḥmad al-Anṣārī al-Qurṭubī, *Al-Jami' li Ahkām al-Qur'an* (Beirut: Dār al-Fikr al-'Arabiyy, n.d.).

²² Mohsen Kadivar, "Refuting the Claim of Consensus (Ijmā') and the Necessity to Implement the Death Penalty for Blasphemy and Apostasy," in *Blasphemy and Apostasy in Islam*, 2020, 182-85, <https://doi.org/10.3366/edinburgh/9781474457576.003.0009>.

²³ Francisco Freire, "Islam, Blasphemy, and Realpolitik in Mauritania: The Mkhaitir Affair1," *Africa Today* 68, no. 2 (2021): 57-79, <https://doi.org/10.2979/africatoday.68.2.03>.

²⁴ Irwan Ahmad Akbar, "DINAMIKA KASUS PENISTAAN AGAMA DI INDONESIA (Polemik Pemaknaan Ayat-Ayat Penistaan Dan UU Penodaan Agama)," *Qof* 3, no. 1 (2019): 89-105, <https://doi.org/10.30762/qof.v3i1.1068>.

religious blasphemy is Wahbah al-Zuhailī, who asserts that the verse prohibits harassment of other religions' worship as it can lead to social problems.²⁵ In this regard, some contemporary Islamic scholars such as Saifullah Khan argue that there is no punishment for blasphemy because punishment is purely God's authority. Likewise, according to Iffatkhalid, the emphasis of the verse is not on the juridical aspect but on God's moral support for Muhammad from his haters.²⁶

On the other hand, some modern scholars oppose these interpretations. Most of them tend to understand the fear of hypocrites when they will be dismantled.²⁷ According to Saeed Kazmi, the punishment for a blasphemer is imprisonment and the maximum sentence is the death penalty.²⁸ His affiliations are Maulana Subhan Mahmood, Maulana Mufti Ghulam Sarwar Qadri, Maulana Hafiz Salahuddin Yousaf, Maulana Muhammad Abdo-hu al-Falah, Maulana Syed Abdul Shakoor, and Maulana Fazle Hadi. All of them are Pakistan Moslem scholars.²⁹ According to QS. al-Tauba [9]: 65-66, as for them, the blasphemers may be sentenced by the death penalty as the maximum punishment. Abir Usman noted that this has caused some Ahmadiyya groups in Pakistan to be treated marginally, even though they are forced to make shahada (convert to Islam) to avoid prison.³⁰

²⁵ Wahbah al-Zuhailī, *Al-Tafsir al-Munir*, ed. Malik Ibrahim, First (Jakarta: Gema Insani, 2016).

²⁶ Iffatkhalid, Ms Shamana Munawar, "Blasphemy Law of Islam-Misconceptions and Fallacy," *Journal of Islamic Studies and Culture* 3, no. 1 (2015), <https://doi.org/10.15640/jisc.v3n1a7>.

²⁷ Shihab, *Tafsir Al-Misbah*.

²⁸ Raza Rumi, "Unpacking the Blasphemy Laws of Pakistan," *Asian Affairs* 49, no. 2 (2018): 319–39, <https://doi.org/10.1080/03068374.2018.1469338>.

²⁹ Naeem Shakir, "Islamic Shariah and Blasphemy Laws in Pakistan," *Round Table* 104, no. 3 (2015): 307–17, <https://doi.org/10.1080/00358533.2015.1053235>; Fatima Tariq, "Blasphemy Laws in Pakistan," *SSRN Electronic Journal*, 2020, <https://doi.org/10.2139/ssrn.3471297>.

³⁰ Saskia Glas, "How Muslims' Denomination Shapes Their Integration: The Effects of Religious Marginalization in Origin Countries on Muslim Migrants' National Identifications and Support for Gender Equality," *Ethnic and Racial Studies* 44, no. 16 (2021), <https://doi.org/10.1080/01419870.2021.1883082>; Rameez Raja, "The Principles of the Flourishing Community: A Case Study of the Persecuted Ahmadiyya Muslim Community," *International Journal on Minority and Group Rights* 27, no. 4 (2020), <https://doi.org/10.1163/15718115-02704008>.

Regarding Allah's command to continue the ridicule of the hypocrites, modern scholars argued that it was an order of sarcasm, of course, so as not to continue their ridicule. They argued that QS. al-Tauba [9]: 65-66 focused on the character of hypocrisy that the character of their hypocrisy is no greater than the hypocrisy of the previous verses. It was explained that the hypocritical character in this verse tends to make it easier to get Allah's forgiveness. Regarding the narration of the unforgivable of their actions, modern scholars interpreted that they did not receive Allah's punishment because it was based on the benefit of other groups.³¹ At this point, they were not pardoned because it was based on their pretext. If they sincerely repent, Allah will forgive them.

The discussion above explains that scholars in both the classical and modern eras hold different opinions regarding the interpretation of QS al-Tauba [9]: 64-66. The varying interpretations, classical and modern scholars, can also impact the process of legislation and policymaking in countries where Islamic law holds sway. Debates arise around the compatibility of certain laws with different interpretations of Islamic teachings, and these discussions influence the development and implementation of legal frameworks. It is important to recognize that the diversity of perspectives within Islamic scholarship enriches the intellectual discourse and allows for a more nuanced understanding of Islamic law. However, it also presents challenges in achieving consensus and creating a unified legal framework that caters to the needs and aspirations of diverse Muslim communities.

Scholars engage in a vigorous debate concerning the enforcement of Islamic principles by the state and its compatibility with religious diversity. Some contend that the state's enforcement of Islamic principles undermines religious pluralism and contravenes the principles enshrined in the country's liberal constitution. The works under review contribute to a nuanced understanding of the role of religion in the development of democracy in Indonesia, while also exploring the applicability of Rawlsian concepts within a Muslim context.

In the post-1998 era, blasphemy trials in Indonesia have played a pivotal role in shaping religious dynamics and the process of

³¹ Al-Ṭabā'ṭabā'ī, *Al-Miẓān fī Tafsīri al-Qur'ān*.

“religion-making.” The democratization process has provided civilian actors with significant opportunities to engage with blasphemy laws, leading to the emergence of what scholars term “lawfare” within the context of religious conflicts. These trials have both intentional and unintentional consequences, ultimately fostering suspicion and divisions among citizens.

Finally, this section sheds light on the contentious aspects surrounding Indonesia’s blasphemy law, particularly its potential encroachments upon the principles of religious freedom guaranteed by the Indonesian Constitution. Notably, human rights activists and civil society organizations have petitioned for judicial reviews of the law before the Constitutional Court, underscoring the pressing need for the appropriate management of religious diversity and the promotion of civic pluralism.

The Cases of Sukmawati and Meiliana Accused of Blasphemy: A Description

1. Sukmawati Soekarnoputri

On November 11, 2019, Sukmawati Soekarnoputri is noted to have had a series of controversial cases related to Islam. Accusations of blasphemy were pinned on her. Sukmawati is being reported in a blasphemy case related to her statement comparing the Prophet Muhammad with the first President of Indonesia, Soekarno.³² In a clip of the viral video, Sukmawati said, “Which is better Pancasila or the Quran? Now I want to ask you all. Those who fought in the 20th century were the noble prophets Muhammad or Ir. Sukarno for independence?”³³

Before this case, Sukmawati had been reported in several cases. Namely, a poem entitled 'Indonesian Mother' was read at the '29 Years of Anne Avantie Work' event at Indonesia Fashion Week 2018. In one of the verses of her poem, Sukmawati alluded to the chant and the call

³² Muhammad Syarif, “Blasphemy of Religion in Islamic Law (Study of Juridical Analysis in Indonesia),” *Journal Transnational Universal Studies* 1, no. 2 (March 2023): 83–92, <https://doi.org/10.58631/jtus.v1i2.14>.

³³ Hary Widyantoro and Fredy Torang W Munthe, “Monopolizing Religious Blasphemy Law Interpretation in Indonesia: The Strategy of Lawfare and the Exercise of Power,” *Mazabib*, 2019, 201–28, <https://doi.org/10.21093/mj.v18i2.1572>.

to prayer. was also considered to have tarnished the religion of Islam. At least, there are 14 police reports related to this case. The 212 Alumni Brotherhood then held the Defend Islam 64 Action and urged the police to arrest her.³⁴

And then she apologized to the Indonesian Muslims. She also visited the office of the Indonesian Ulema Council (MUI). MUI Chairman, Ma'ruf Amin asked Indonesian Muslims to forgive Sukmawati for her poetry reading. Ma'ruf said that poetry is just the thoughts of an artist or humanist who is free to express. Many Indonesian Muslims believe that Sukmawati's series of controversial statements above contain an element of harassment against religion. But police stopped investigating the alleged blasphemy case. She lives in free air.³⁵

Some Indonesian Muslims are disappointed. Supposedly, Sukmawati should not be forgiven. Because she has insulted Islam. They argue that it is permissible to forgive when it comes to human abuse. However, if it is related to blasphemy against the *Sharia*, then it cannot be forgiven. In fact, in some opinions, she may even be executed. It is based on QS. al-Tauba [9]: 64-66, it is considered as legislation for blasphemy cases.

According to some Islamic scholars in Indonesia, the term *istihza'* in QS. al-Tauba [9]: 64-66 interpreted as blasphemy. Some Indonesian Muslims considered Sukmawati's poem to be blasphemy, so they must be killed. Chairman of the 212 Alumni Presidium (PA), Slamet Ma'arif, said his party refused to be mediated by police. He said, "We forgive fellow Muslims. But if the Sharia is violated, it should not be forgiven".³⁶ In *nahimunkar.org* considered Sukmawati could not be forgiven based on QS. al-Tauba [9]: 64-66.³⁷ Gus Najih, second son of KH. Maimun Zubair cursed what Kusumawati did and considered her

³⁴ Widyantoro and W Munthe.

³⁵ M. Syamsul Huda, "The Local Construction of Religious Blasphemy in East Java," *Journal of Indonesian Islam* 13, no. 1 (June 2, 2019): 96–114, <https://doi.org/10.15642/JIIS.2019.13.1.96-114>.

³⁶ <https://megapolitan.kompas.com/read/2019/11/18/09221311/sukmawati-soekarnoputri-diadukan-ke-polisi-atas-dugaan-penistaan-agama> accessed in December 12, 2022.

³⁷ <https://www.nahimunkar.org/sukmawati-tak-kapok-lecehkan-islam/> accessed in December 12, 2022.

a sinner who must be given the death penalty. At this point, some of them assume QS. al-Tauba [9]: 64-66 is a blasphemy law.³⁸

Hence, the aforementioned evidence illustrates that the ulama was actively engaged in a fervent discourse concerning the issue of religious blasphemy within the Quran. Divergent perspectives have emerged, with proponents contending that QS. al-Tauba [9]: 64-66 constitutes a blasphemous verse, while others vehemently refute this stance. Consequently, a perpetual diversity of interpretations persists about the Quran, as exemplified in the present case of blasphemy. This ongoing diversity serves to dynamically influence and shape the domain of law, encompassing both Islamic law and conventional legal systems.

Many individuals express their concern over the swift closure of this case following Sukmawati's apology. The primary rationale behind this decision appears to be the prevailing power of the PDI-P (Indonesian Democratic Party of Struggle), rather than Sukmawati's expression of remorse. It is important to note that the PDI-P was established by Megawati, Sukmawati's elder sister. Notably, neither the police nor the president himself ventured to reprimand Sukmawati when she engaged in misconduct, as Joko Widodo's presidential aspirations relied on the support of the PDI-P. While this disparity in treatment may be perceived as a manifestation of inequality, it is nonetheless emblematic of the nature of Indonesian democracy.

Despite the existence of such inequalities, Indonesian democracy has consistently exhibited similar patterns, even in cases where the MUI (Indonesian Ulema Council) has refrained from issuing a prompt response to Sukmawati's statements. This phenomenon can be attributed to the proclivity of Ma'ruf Amin, the Chairman of the MUI, to prioritize personal interests over considerations of justice. Ma'ruf Amin, being associated with the ruling PDI-P, likely refrained from confronting Sukmawati due to vested interests. While the alignment of Ma'ruf Amin's interests may not have been immediately evident during the occurrence of this case, it is worth noting that he successfully assumed the role of Vice President following the 2019 elections. Such an outcome is potentially attributable to his adept negotiations with prominent figures within the PDI-P. For instance,

³⁸ <https://suaraislam.id/gus-najih-maimun-kecam-pernyataan-sukmawati-dan-ahmad-muwafiq/> accessed in December 12, 2022.

had Ma'ruf Amin issued an unfavorable fatwa against Sukmawati, it is conceivable that he would not hold the position of Vice President at present.

The case involving Sukmawati Soekarnoputri, and allegations of blasphemy has raised significant concerns among the public. The swift closure of the case following Sukmawati's apology can be attributed to the influential power of the PDI-P, which was founded by her sister, Megawati. Notably, the lack of reprimand from both the police and the president himself suggests a political motivation, as Joko Widodo's presidential aspirations relied on the support of the PDI-P. This incident highlights the inherent inequalities within Indonesian democracy, where those in power may receive preferential treatment. Additionally, the reluctance of the MUI to respond promptly to Sukmawati's statements raises questions about the prioritization of personal interests over justice, particularly in the case of Ma'ruf Amin, the Chairman of the MUI, who has affiliations with the ruling party. This episode underscores the complex dynamics between politics, power, and religion within the Indonesian context.

2. Meiliana

Different from Sukmawati, On Monday, April 8, 2019, the Supreme Court (*Mahkamah Agung* (MA)) rejected the appeal filed by Meiliana, who had been sentenced to 18 months in prison by the District Court of Medan, North Sumatra, the previous year.³⁹ She had complained about the volume of the call to prayer (azan). Meiliana became a suspect after complaining about the loudness of the call to prayer from a nearby mosque in late July 2016. Some netizens have expressed support for Meiliana, while others view her actions as a bad precedent that could disrupt the religious lives of Muslims. The case has become a hot topic on social media, with many people expressing support for Meiliana and criticizing the verdict, while others hold differing opinions.⁴⁰

³⁹ Nusya Kuswantin, "Being a Minority in a Moslem Neighborhood: Reflective Experience of a Buddhist Priest in Cemani Village," *Jurnal Nyanadassana: Jurnal Penelitian Pendidikan, Sosial Dan Keagamaan* 1, no. 1 (June 2022): 27–37, <https://doi.org/10.59291/jnd.v1i1.7>.

⁴⁰ Risdianto, Faizal, Sumarlam Sumarlam, and Noor Malihah. "The Representation of Power in the Text News on the Meiliana Case (A Norman

In the trial at the High Court in North Sumatra in May 2018, the prosecutor designated Meiliana as a suspect of religious blasphemy and charged her under Article 156 and 156a of the Indonesian Criminal Code regarding blasphemy.⁴¹ Some netizens on Twitter have expressed their support for Meiliana, while others have compared this case to the blasphemy case involving the former Governor of Jakarta, Basuki Tjahaja Purnama. In this case, the Indonesian Ulema Council (MUI) of North Sumatra also issued a fatwa stating that Meiliana's statements belittled and blasphemed against Islam. Islamic groups have also attended Meiliana's trial to demand a guilty verdict against her.⁴²

Some well-known figures have shown their support for Meiliana. In August 2018, Yenny Wahid, the Executive Director of the Wahid Institute, expressed her support through her Twitter account,⁴³ while the Minister of Religious Affairs, Lukman H. Saifuddin, stated his willingness to serve as an expert witness to mitigate Meiliana's trial.⁴⁴

On January 24, 2017, the Indonesian Ulema Council (MUI) issued Decision Number: 001/KF/MUI-SU/I/2017, addressing the case of religious blasphemy committed by Ms. Meiliana in Tanjungbalai City. This decision encompasses a fatwa specifically concerning the act of blasphemy against Islam perpetrated by Ms. Meiliana.⁴⁵

As stipulated in the legal provisions mentioned, the recitation of the *azan* (call to prayer) within a mosque is regarded as an integral

Fairclough Critical Discourse Analysis)." International Seminar on Recent Language, Literature, and Local Cultural Studies (BASA 2018). Atlantis Press, 2018.

⁴¹ Muhammad Jailani Irwansyah, "The Role of Media in the Dynamics of Relationship between Muslims and Buddhism in the Post-Conflict in Tanjung Balai City, North Sumatra Province," *Jurnal Nyanadassana: Jurnal Penelitian Pendidikan, Sosial Dan Keagamaan* 1, no. 2 (December 2022): 148–58, <https://doi.org/10.59291/jnd.v1i2.20>.

⁴² Santoso, Sofiana. "Analisis Resepsi Audiens Terhadap Berita Kasus Meiliana di Media Online." *Komuniti: Jurnal Komunikasi Dan Teknologi Informasi* 12.2 (2021): 140-154.

⁴³ Arief Ikhsanudin, "Meiliana Dihukum, Yenny Wahid: Momen DPR Revisi UU Penodaan Agama," *Detik*, 2018.

⁴⁴ Agus Supratman, "Menag Siap Menjadi Saksi Kasus Vonis Ibu Meiliana," *CNN Indonesia*, 2018.

⁴⁵ Rahman, Faqih Zuhdi. Pengaruh Fatwa MUI Nomor: 001/KF/MUI-SU/I/2017 Tentang Penistaan Agama dalam Putusan PN Medan Nomor: 1612/Pid. B/2018/PN Mdn. BS thesis.

component of Islamic religious law, serving as an indicator of prayer times and exhorting Muslims to engage in prayer. The expressions and remarks articulated by Ms. Meiliana in response to the sound of the azan emanating from Al-Maksum Mosque, located on Karya Street in Tanjungbalai City, on July 29, 2016, are deemed to constitute acts of disparagement and blasphemy directed towards the Islamic faith.⁴⁶

In the ensuing recommendations, the MUI urges law enforcement agencies, particularly the Police authorities, to expeditiously undertake legal measures against Ms. Meiliana in strict accordance with the prevailing regulations and legislation. Furthermore, the Muslim community, with a particular emphasis on the Muslim populace of Tanjungbalai City, is advised against succumbing to provocation or engaging in acts of an anarchic nature, while being encouraged to actively maintain harmonious coexistence and foster religious tolerance among the various faith communities within the city. Considering these circumstances, the MUI also calls upon all adherents of Islam, particularly those residing in Tanjungbalai City, to wholeheartedly entrust the legal process to the competent authorities, thereby ensuring the just resolution of this issue by the applicable legal framework and statutes.⁴⁷

The decision of the Medan District Court in the case of Meiliana, registered under case number 1612/Pid.B/2018/PN Mdn, was significantly influenced by the fatwa (religious edict) issued by the Indonesian Ulema Council (MUI) of North Sumatra with fatwa number 001/KF/MUI-SU/I/2017. This fatwa provided a legal basis for the court to handle the blasphemy case involving Meiliana. The court's decision was based on thorough legal considerations and

⁴⁶ Malihah, Noor, Risdianto Faizal, and Sumarlam Sumarlam. "The representation of power in the text news on the Meiliana Case (A Norman Fairclough Critical Discourse Analysis)." Proceedings of the International Seminar on Recent Language, Literature, and Local Cultural Studies (BASA 2018). Vol. 280. Atlantis Press, 2018.

⁴⁷ Benny Susetyo, "Constellation Of Power Behind Communication Presidential In Intolerance Issues (Critical Discourse Analysis of the President's Statement in the Case of Meliana in Tanjungbalai)," *International Journal of Environmental, Sustainability, and Social Science* 3, no. 2 (July 2022): 313–31, <https://doi.org/10.38142/ijess.v3i2.216>.

testimonies presented by experts, witnesses, the Public Prosecutor (JPU), and the panel of judges during the trial.⁴⁸

In interpreting the Meiliana case, a key factor that influenced the decision of the Medan District Court was Meiliana's statement regarding the loud volume of the call to prayer from the mosque near her house. This statement sparked controversy in the community and led to riots. In this context, the fatwa issued by the MUI of North Sumatra played a crucial role in determining whether Meiliana's actions could be categorized as blasphemy.

The fatwa from the MUI of North Sumatra clearly articulated that Meiliana's statement was deemed disrespectful and blasphemous towards Islam. Extremist Islamic groups, supported by the MUI, considered her actions as an insult to the teachings of Islam. During the trial, the experts, witnesses, JPU, and panel of judges adopted this fatwa as a basis for assessing Meiliana's actions.⁴⁹

Although the decision has sparked controversy in society, the Medan District Court's ruling in the Meiliana case reflects a legal interpretation based on the fatwa issued by the MUI and the opinions of the experts involved in the trial. This highlights the importance of maintaining a balance between freedom of expression and respect for religious values within the legal context in Indonesia.⁵⁰

Blasphemy as an Ethical Violation: An Analysis from the *Ma'na-cum-Maghza* Perspective

Based on the previous explanations, the author admits that what Sukmawati and Meiliana did was excessive and unethical. Nevertheless, considering their actions as a form of blasphemous is unconformity. What are they accused of based on QS. al-Tauba [9]: 64-66 is an insignificance opinion. The assumption of blasphemy in the term *istibza'* is a biased interpretation, because it is not following the

⁴⁸ Emasari, Sheza Agustina. Analisis Pemidaan Atas Kasus Penghinaan Terhadap Suara Adzan Ditinjau Prespektif HAM (Studi Putusan Pengadilan Negeri Medan Nomor 1612/Pid. B/2018/PN. Mdn). Diss. Universitas Muhammadiyah Malang, 2020.

⁴⁹ Dewi, Sartika. "Batasan Tindak Pidana Penodaan Agama." *UNISKA LAW REVIEW* 3.1 (2022): 24-52.

⁵⁰ Maula, Bani Syarif. "Post-Islamism and the Rise of Sharia Laws in Contemporary Indonesia: Aspirations of Implementing Islamic Laws in a Democratic Era." *International Journal of Social Science and Religion (IJSSR)* (2023): 163-184.

significance of the verse. The QS. al-Tauba [9]: 64-66 is ethical verses, not crimes. However, the authority to punish is not in the hands of humans, but it is the right of God himself. QS. al-Tauba [9]: 68 stated:

“Allah has promised the hypocrite men and hypocrite women and the disbelievers the fire of Hell, wherein they will abide eternally. It is sufficient for them. And Allah has cursed them, and for them is an enduring punishment”

It is very wrong to think that the term *istihza* in QS. al-Tauba [9]: 64-66 means blasphemy. This is based on the macro context and micro context of the verse. Historical data states that the verse was revealed at the time of departure to Tabuk.⁵¹ The Prophet needed to send an army there worried by the Byzantines who had just won the war against the Persians. Geographically, Tabuk is close to the border of the Syam. Syam and Petra are two areas in the Near East that are very close to the Islamic rule in Medina.⁵² These two lands were also recently occupied by Byzantium. The Prophet worried that at any time the Byzantines would annex Medina. Moreover, the power of the Prophet in Medina at that time was well established. Confidently, the Prophet sent an army of 30,000 to Tabuk to drive out the Byzantine power.⁵³ This is what triggers the emergence of underestimates from the Medinan society, especially the Hypocrites.⁵⁴

Many hypocrites criticized the Prophet's decision. They thought the Prophet was too reckless. Demeaning narratives began to appear. They mocked that a war against the Romans is like a war against the Arabs and they burst out laughing.⁵⁵ Even considered the mission to Tabuk as a joke. The Prophet decided to carry out the Tabuk expedition which led to the harassment of the hypocrites against the

⁵¹ Ibn ‘Ashūr, *Al-Tahrir wa al-Tanwir*

⁵² Greg Fisher, *Rome, Persia, and Arabia, Rome, Persia, and Arabia*, 2019, <https://doi.org/10.4324/9780429356483>.

⁵³ E. Graf and W. Montgomery Watt, “Muhammad. Prophet and Statesman,” *Die Welt Des Islams* 8, no. 1/2 (1962): 62, <https://doi.org/10.2307/1569724>.

⁵⁴ Muḥammad Abū Zahrah, *Zabratu al-Tafsir* (Beirut: Dār al-Fikr al-‘Arabiyy, n.d.).

⁵⁵ Muḥammad Shihāb ad-Dīn Abū al-Thānā’ al-Ālūsī, *Riḥ al-Ma‘ānī* (Beirut: Dār Iḥyā’ Turāth, n.d.).

Prophet. They doubted the Prophet's ability as a leader.⁵⁶ Simultaneously when their laughter peaked, QS. al-Tauba [9]: 64-66 revealed. The term *istihza* explicitly describes the form of ridiculing.

Socio-historically, the verse is not in the context of criminal law, instead, it is a verse in the scope of ethics. The term *la ta'taziru* is not in the context of a command that concludes the form of obligation. It is synchronized with the next term, namely *qul istahzi'u*. Even though they are in the form of command words, these two words have the meaning of *li tabzir* (as a warning) following the opinion of classical Muslim scholars.

It seems this interpretation creates confusion. It has a major impact on blasphemy law. So, when using that understanding, there is a lot of subjectivity that binds forms of harassment. Even though the verse is by no means as *qayyid* (binder) it elaborates on the limitations related to the punishment of blasphemers. In the verse, it is explained that their actions do not need to be forgiven. But the truth is, later on, the Prophet forgave the perpetrators.

This verse, in the opinion of the author, has two functions, namely, first, it becomes counterproductive to the ridicule of Hypocrites. This is based on the form of the Quran's threats against them, with the subtle narration, *fastahzi'u!* (keep-mocking!). It could also be, secondly, that the verse speaks in the context of comforting the Prophet in the form of support because the Prophet was a victim of bullying. So based on this, the term *istihza* which originally meant ridiculing became hate speech and bullying from the Hypocrites.

Therefore, the significance of QS. al-Tauba [9]: 64-66 is not speaking in the context of the law of blasphemy. However, the verse is God's support system for victims of bullying. So, is mocking the Prophet unforgivable and even killable? The answer is no. It is right that mocking and ridiculing is a bad deed. But it's excessive to consider QS. al-Tauba [9]: 64-66 as a law of blasphemy. The verse speaks in an ethical context, not in a criminal context. If indeed insulting the Prophet was subject to death, of course, the Prophet would slaughter

⁵⁶ William Muir, *Life of Mohamet*, vol. 1, 1861.

all his enemies while in Mecca and Medina. Anyway, it is not. He even prays for his enemies even if they are dead in a state of disbelief.⁵⁷

Conclusions

The Sukmawati and Meiliana cases have indeed colored blasphemy cases in Indonesia. This led to a long debate among the Indonesian Muslim community. Several parties have stated that Sukmawati and Meiliana committed blasphemy by insulting religious law and the Prophet: committing blasphemy. This assumption is based on QS. al-Taubah [9]: 64-66. Some groups even claim that Sukmawati and Meiliana should not be forgiven and should be sentenced to death. However, blasphemy, often referred to QS. al-Tauba [9]: 64-66, when analyzed through the *ma'na-cum-maghza* perspective, does not fall within the realm of criminal law, but rather ethical issues. Therefore, the opinion that Sukmawati and Meiliana committed blasphemy and should be sentenced to death is actually an overreaction. What Sukmawati and Meiliana did was indeed wrong, but it is excessive to consider that they should be sentenced to death. Based on QS. al-Tauba [9]: 68, it is explicitly stated that it is God who has the right to punish blasphemers, not humans.

This article only focuses on two cases of blasphemy, namely those involving Sukmawati and Meiliana. However, it contributes to the interpretation of QS. al-Tauba [9]: 64-66, which is often used as a basis and reference for accusing someone of blasphemy. By employing the *ma'na-cum-maghza* perspective, this article provides a new viewpoint on the meaning and legal sanction for blasphemy; blasphemy is a bad and reprehensible act, but it should not be categorized as a criminal act, but rather an ethical violation. This new perspective is expected to enrich the discourse and discussions on blasphemy, which could continue to occur in this country or elsewhere.

Conflicts of Interest

The authors have no conflict of interest with any party in writing this article.

⁵⁷ Muqatil ibn Sulayman, *Tafsir Muqatil Ibn Sulayman*, ed. Ahmad Farid, 1 (Beirut: Dar al-Kutub al-'Ilmiyyah, 2002).

Bibliography

- Akbar, Irwan Ahmad. "DINAMIKA KASUS PENISTAAN AGAMA DI INDONESIA (Polemik Pemaknaan Ayat-Ayat Penistaan Dan UU Penodaan Agama)." *Qof* 3, no. 1 (2019): 89–105. <https://doi.org/10.30762/qof.v3i1.1068>.
- al-Ālūsī, Muḥammad Shihāb al-Dīn Abū al-Thānā'. *Rūḥ al-Ma'ānī*. Beirut: Dār Iḥyā' Turāth, n.d.
- al-Andalusī, Abū 'Abdillāh Muḥammad ibn Yūsuf. *Al-Tafsīr al-Kabīr al-Musammā al-Baḥru al-Muḥīṭ*. Beirut: Dār al-Turāth, n.d.
- Fisher, Greg. *Rome, Persia, and Arabia. Rome, Persia, and Arabia*, 2019. <https://doi.org/10.4324/9780429356483>.
- Freire, Francisco. "Islam, Blasphemy, and Realpolitik in Mauritania: The Mkhaitir Affair1." *Africa Today* 68, no. 2 (2021): 57–79. <https://doi.org/10.2979/africatoday.68.2.03>.
- Glas, Saskia. "How Muslims' Denomination Shapes Their Integration: The Effects of Religious Marginalization in Origin Countries on Muslim Migrants' National Identifications and Support for Gender Equality." *Ethnic and Racial Studies* 44, no. 16 (2021). <https://doi.org/10.1080/01419870.2021.1883082>.
- Graf, E., and W. Montgomery Watt. "Muhammad. Prophet and Statesman." *Die Welt Des Islams* 8, no. 1/2 (1962): 62. <https://doi.org/10.2307/1569724>.
- Huda, M. Syamsul. "The Local Construction of Religious Blasphemy in East Java." *Journal of Indonesian Islam* 13, no. 1 (June 2, 2019): 96–114. <https://doi.org/10.15642/JIIS.2019.13.1.96-114>.
- Ibn 'Āshūr, Muḥammad al-Ṭāhir. *Al-Taḥrīr wa al-Tamwīr*. Tunis: Dār Ṣaḥnūn, n.d.
- Ibn Ḥabīb, Abū al-Ḥasan 'Alī ibn Muḥammad. *Tafsīr al-Māwardī*. Beirut: Dār al-Kutub al-'Ilmiyyah, n.d.
- Ikhsanudin, Arief. "Meiliana Dihukum, Yenny Wahid: Momen DPR Revisi UU Penodaan Agama." *Detik*, 2018.
- Irwansyah, Muhammad Jailani. "The Role of Media in the Dynamics of Relationship between Muslims and Buddhism in the Post-

- Conflict in Tanjung Balai City, North Sumatra Province.” *Jurnal Nyanadassana: Jurnal Penelitian Pendidikan, Sosial Dan Keagamaan* 1, no. 2 (December 2022): 148–58. <https://doi.org/10.59291/jnd.v1i2.20>.
- Kadivar, Mohsen. “Refuting the Claim of Consensus (Ijmāʿ) and the Necessity to Implement the Death Penalty for Blasphemy and Apostasy.” In *Blasphemy and Apostasy in Islam*, 182–85, 2020. <https://doi.org/10.3366/edinburgh/9781474457576.003.0009>.
- Kuswantin, Nusya. “Being a Minority in a Moslem Neighborhood: Reflective Experience of a Buddhist Priest in Cemani Village.” *Jurnal Nyanadassana: Jurnal Penelitian Pendidikan, Sosial Dan Keagamaan* 1, no. 1 (June 2022): 27–37. <https://doi.org/10.59291/jnd.v1i1.7>.
- Morris, Elwood. *A Comprehensive Commentary on The Quran*. London: Trubner & Co., Ludgate Hill, 1885.
- Muhammad Abu Zahrah. *Zubrotu At-Tafasir*. Beirut: Dar al-Fikr al-ʿArabiyy, n.d. https://islamweb.net/ar/library/index.php?page=bookcontents&ID=135&flag=1&bk_no=221&surano=2&ayano=222.
- Muir, William. *Life of Mohamet. Life of Mohamet*. Vol. 1, 1861.
- Munawar, Iffatkhalid, Ms Shamana. “Blasphemy Law of Islam- Misconceptions and Fallacy.” *Journal of Islamic Studies and Culture* 3, no. 1 (2015). <https://doi.org/10.15640/jisc.v3n1a7>.
- al-Nisfi, ‘Abdullāh ibn Aḥmad ibn Maḥmūd. *Tafsīr al-Nisfī*. Damaskus: Dār al-Kalām at-Ṭayyib, 1998.
- Nurindra, Dyah, Prahastiwi Utari, and Sudarmo Sudarmo. “Roland Barthes’s Semiotic Analysis: Islamic Anti-Radicalism Message to Raise Indonesia Reconciliation by Sukmawati Soekarnoputri.” In *The Proceedings of the 4th International Conference of Social Science and Education, ICSSSED 2020, August 4-5 2020, Yogyakarta, Indonesia*. EAI, 2020. <https://doi.org/10.4108/eai.4-8-2020.2302417>.
- al-Qurṭubī dan Abū ‘Abdillāh Muḥammad ibn Aḥmad al-Khazrajī. *Al-*

Jami' li Ahkām al-Qur'an, Juz 10. Beirut: Dār al-Fikr al-'Arabiy, 1993.

Raja, Rameez. "The Principles of the Flourishing Community: A Case Study of the Persecuted Ahmadiyya Muslim Community." *International Journal on Minority and Group Rights* 27, no. 4 (2020). <https://doi.org/10.1163/15718115-02704008>.

al-Rāzī, Fakhrud-Dīn Abū 'Abdullāh Muḥammad ibn 'Umar. *Mafāṭih al-Ghaib*. Edited by Muḥammad 'Alī Baidlawī. Beirut: Dār al-Kutub al-'Ilmiyyah, 2004.

Richardson, Peter, Stephen Pihlaja, Miori Nagashima, Masako Wada, Makoto Watanabe, and Baramée Kheovichai. "Blasphemy and Persecution: Positioning in an Inter-Religious Discussion." Edited by Tim Lindsey and Helen Pausacker. *Text & Talk* 40, no. 1 (January 2020): 75–98. <https://doi.org/10.1515/text-2019-2049>.

Risdianto, Faizal., Sumarlam., and Noor. Malihah. "The Representation of Power in the Text News on the Meiliana Case (A Norman Fairclough Critical Discourse Analysis)." *Advances in Social Sciences, Education and Humanities Research* 280, no. Basa (2018): 234–45.

Rumi, Raza. "Unpacking the Blasphemy Laws of Pakistan." *Asian Affairs* 49, no. 2 (2018): 319–39. <https://doi.org/10.1080/03068374.2018.1469338>.

Shakir, Naeem. "Islamic Shariah and Blasphemy Laws in Pakistan." *Round Table* 104, no. 3 (2015): 307–17. <https://doi.org/10.1080/00358533.2015.1053235>.

Shihab, Quraish. *Tafsir Al-Misbab*. Tangerang: Lentera Hati, 2005.

Sulaymān, Muqāṭil ibn. *Tafsīr Muqāṭil ibn Sulaymān*. Edited by Aḥmad Farīd. Vol. 1. Beirut: Dār al-Kutub al-'Ilmiyyah, 2002.

Supratman, Agus. "Menag Siap Menjadi Saksi Kasus Vonis Ibu Meiliana." CNN Indonesia, 2018.

Susetyo, Benny. "Constellation Of Power Behind Communication Presidential In Intolerance Issues (Critical Discourse Analysis of the President's Statement in the Case of Meliana in

- Tanjungbalai).” *International Journal of Environmental, Sustainability, and Social Science* 3, no. 2 (July 2022): 313–31. <https://doi.org/10.38142/ijesss.v3i2.216>.
- Syahputra, Iswandi. “Activities on Twitter and the 212 Defend Islam Rally through the Perspective of the Indonesian Ulama Council.” *Al-Jami’ab* 58, no. 2 (2020): 323–54. <https://doi.org/10.14421/ajis.2020.582.323-354>.
- Syarif, Muhammad. “Blasphemy of Religion in Islamic Law (Study of Juridical Analysis in Indonesia).” *Journal Transnational Universal Studies* 1, no. 2 (March 2023): 83–92. <https://doi.org/10.58631/jtus.v1i2.14>.
- al-Ṭabā’ṭabā’ī, Sayyid Muḥammad Ḥusain. *Al-Miẓān fī Tafsīri al-Qur’ān*. Beirut: Mu’assasah al-‘Alam li al-Maṭbū‘āt, 1997.
- al-Ṭabarī, Abū Ja’far Muḥammad ibn Jarīr. *Jāmi‘ al-Bayān ‘an Ta’wīl Āy al-Qur’ān*. Edited by Maḥmūd Muḥammad Shākīr. Aleppo: Dār al-Ma‘ārif, n.d.
- Tariq, Fatima. “Blasphemy Laws in Pakistan.” *SSRN Electronic Journal*, 2020. <https://doi.org/10.2139/ssrn.3471297>.
- Tyson, Adam. “Blasphemy and Judicial Legitimacy in Indonesia.” *Politics and Religion* 14, no. 1 (March 11, 2021): 182–205. <https://doi.org/10.1017/S1755048319000427>.
- Widyantoro, Hary, and Fredy Torang W Munthe. “Monopolizing Religious Blasphemy Law Interpretation in Indonesia: The Strategy of Lawfare and the Exercise of Power.” *Maḥāhib*, 2019, 201–28. <https://doi.org/10.21093/mj.v18i2.1572>.
- al-Zuhailī, Wahbah. *Al-Tafsīr al-Munīr*. Edited by Malik Ibrahim. First Ed. Jakarta: Gema Insani, 2016.
- Zulfa, Eva Achjani. “Restorative Justice for Blasphemy in Indonesia: Study on the Application of the PNPM Law No. 1 of 1965.” *International Journal of Science and Society* 1, no. 4 (December 12, 2019): 54–62. <https://doi.org/10.54783/ijssoc.v1i4.159>.

