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Legal Dynamics in the Protection of Women in the Crime of Remarriage Without Permission

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ABSTRACT

Marriage in the Indonesian legal system is fundamentally based on the principle of monogamy, which aims to establish a happy and lasting family. However, in practice, many cases of remarriage without permission still occur outside legal provisions, either through unregistered marriages or by concealing prior marital status. This phenomenon causes harm to women and children, socially, economically, and legally. This study aims to analyze the dynamics of legal regulation concerning the criminal act of remarriage without permission and to examine the forms of legal protection for women in various court decisions. This research employs a normative legal method with statutory, conceptual, and case approaches, using primary, secondary, and tertiary legal materials analyzed qualitatively. The results indicate that Indonesian law has undergone significant development by classifying remarriage without permission as a criminal offense, as regulated under Articles 402 and 403 of the National Criminal Code. These provisions provide not only preventive protection through strict requirements for polygamy but also repressive protection through criminal sanctions and mechanisms for marriage annulment. Furthermore, court decisions demonstrate a tendency to uphold the protection of women's rights, particularly in cases where marriages are conducted in bad faith. Thus, the evolving legal dynamics have strengthened the position of women in obtaining justice and legal certainty within the institution of marriage.

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1. INTRODUCTION

Marriage is a ritual that humans face in their adulthood to be able to have contact with the opposite sex for a long time based on a sense of love for others and is legalized by the state [1, p. 103]. If a man and a woman have agreed to get married, it means that they have promised to obey and submit to the legal rules that apply in marriage and those rules apply as long as the marriage lasts or the marriage is broken. Marriage is a bond of feelings made by a man and a woman with a sincere heart that is legal in law and religion, where the man becomes the husband and the woman becomes the wife. Law Number 16 of 2019 concerning amendments to Law Number 1 of 1974 concerning Marriage states that "Marriage or marriage is an innate bond between a man and a woman as husband and

wife with the aim of forming a happy and eternal family (household) based on the One Godhead" [2].

The principles that are used as the foundation or body for the formation of the marriage law that is lived by the Indonesian people, namely the purpose of marriage is to form a happy and eternal family, marriage is considered valid if it is held based on religious laws and beliefs, to be recorded according to the rules, the principle of monogamy is basically used as a foundation, the prospective bride and groom should be mature in spirit and body when carrying out the marriage. Considering that the purpose of marriage is to form a happy and permanently prosperous family, the principle is adhered to to make it difficult for divorce to occur, there is a balance of legal positions between husband and wife [3, p. 22].

The concept of marriage in Hinduism is not much different from other religions, not affected by social changes that occur in modern times. Marriage in Hinduism is considered a religious obligation. Hinduism teaches that there is an inseparable bond between husband and wife, which shows the meaning of fidelity in marriage. But even so, it turns out that Hindus have also practiced polygamy extensively since ancient times. As was done by Hindu communities living in Babylon, Assyria, and Persia [4]. Regarding marriage in the Hindu concept, Kallol Kumar Bhattacharyya stated the following:

> *In Hinduism, the foundation for marriage is friendship, which is the understanding and the commitment between spouses. Arrange marriage tradition is still considered as the societal norm in India, and is regarded as an event for life. The relationship based on a strong bonding with each other helps the couple to maintain other social relationships in and outside their extended multigenerational family and help spouses to have good physical and mental health in their future life. This influence on their longevity and promotes healthy aging. Marriage, in Hinduism, also considered as the relationship of souls which extends beyond a single life through incarnations.* [5].

In principle, a marriage of a man can only have one wife, then polygamy or a husband with more than one wife is allowed if desired by the parties concerned and the court gives permission [6, p. 140]. The reasons given by the court to grant a polygamy license are affirmed in Article 4 Paragraph (2) of Law Number 1 of 1974 concerning marriage. The court referred to in Paragraph (1) of this article only gives permission to a husband who will marry more than one wife if [7]:

1) The wife cannot carry out her duties as a wife.
2) The wife gets a physical disability or disease that cannot be cured.
3) The wife cannot bear children.

Regarding Article 4 of the Marriage Law above, it shows that there are at least three reasons that are used as the basis for applying for polygamy. First, the wife cannot carry out her obligations as a wife. Second, the wife has a physical disability or disease that cannot be cured, and third, cannot bear children [8, p. 96].

The provisions regarding the second marriage permit and so on are not just administrative formalities, but an instrument of legal protection for women's dignity and the certainty of children's rights. Juridically, the act of a husband who remarries without the permission of the court and without the consent of the legal wife can be categorized as a criminal offense. This is as stipulated in Article 279 of the Criminal Code (KUHP) or in the latest codification of Law Number 1 of 2023 as amended in Law Number 1 of 2026 concerning Criminal Adjustment which threatens criminality for those who carry out marriages even though they know that existing marriage is a legal obstacle to it.

The current phenomenon shows that there are husbands who want to practice polygamy tend to ignore the conditions that have been set by laws and regulations. Some ordinary people still underestimate the provisions of Islamic law regarding polygamy; they think that marriage is legal as long as it fulfills the pillars such as dowry and witnesses, without considering the long-term

legal consequences. Until now, the practice of under-hand marriage (*siri*) carried out by husbands without the permission of the first wife is still rampant in society. This phenomenon has not found an effective preventive solution to prevent the occurrence of illegal polygamy. The impact of this practice is very significant, namely the emergence of cases of neglect of legal wives and children. When a husband or father leaves his family to carry out a second marriage without responsibility, it directly results in children losing their livelihood, attention, and protection, so that their future is neglected [9].

This research is crucial to dissect the extent of the effectiveness of existing regulations in providing preventive and repressive protection for women. The main focus is directed on how the law responds to the phenomenon of remarriage without permission so that it is not only a rule on paper, but is able to guarantee justice for wives who are harmed morally, socially, and materially.

2. METHODS

This study uses a normative legal research method (*doctrinal research*) that focuses on inventory, synchronization, and legal discovery related to the protection of women in the crime of remarriage without permission. The approach used includes a *statute approach* by examining Law No. 1 of 1974 jo. Law No. 16 of 2019 concerning Marriage and criminal law reform in Law No. 1 of 2023 jo. Law No. 1 of 2026, a *conceptual approach* to understand the doctrine of preventive and repressive legal protection, and a *case approach* through the analysis of relevant court decisions. The data sources of this research are secondary data consisting of primary legal materials in the form of laws and regulations and judges' decisions, secondary legal materials in the form of journals, books, and legal research results, and tertiary legal materials in the form of legal dictionaries. All legal materials collected were analyzed qualitatively using descriptive-analytical methods to provide an in-depth picture of the dynamics of the law and the effectiveness of regulations in protecting women's rights from the practice of marriage without consent.

3. RESULTS AND DISCUSSION

3.1 Remarriage Arrangements Without Permission

Marriage according to the Law of the Republic of Indonesia Number 1 of 1974 concerning Marriage Article 1 that "Marriage is an innate bond between a man and a woman as husband and wife with the aim of forming a happy and eternal family or household based on the One Godhead." Furthermore, in Article 2 of the Compilation of Islamic Law, the definition of marriage is formulated as follows: Marriage according to Islamic Law is:

> *Marriage, which is a very strong contract or mitssaqan ghalidzan to obey Allah's commands and carry them out is worship.*

According to Abdul Manan, among the things that are used as the underlying reason for marriage under the hand, such as [10]:

1) If the conditions for polygamy are not met, especially without the consent of the previous wife, the person carries out the marriage under the hand, simply in front of religious leaders.
2) With the existence of Government Regulation No. 10 of 1983 jo. Government Regulation No. 45 of 1990, in Article 4 paragraph (1) among others, it is stated that a man with the status of a Civil Servant may not have more than one wife, if that happens, he is obliged to report and obtain permission first from his officials or leaders. With the existence of Government Regulation No. 10 of 1983, they think that with the difficulty of the requirements for polygamy, there are (albeit few) civil servants who carry out

marriages without going through the actual procedures.
3) Because they are still laymen, there is a feeling of fear to deal with marriage officials and think that they are better off having their marriage done in front of religious leaders.
4) Religion is often used as a postulate to legitimize certain subjective desires. Even though the rules of religion are equally clear, that Law Number 1 of 1974 applies to Muslims.
5) The assumption of some Indonesian people in general that unmarried or unmarried women are less appreciated, rather than not being married, it is better to marry even with a married man even though it is not recorded at the Office of Religious Affairs (KUA). These are the reasons that are the basis for marriage under hand in addition to social, cultural, economic, religious, and also low level of education.

Law Number 16 of 2019 concerning Amendments to Law Number 1 of 1974 concerning Marriage expressly places the principle of monogamy as a basic principle in the marriage legal system in Indonesia. To perform a polygamous marriage, 2 (two) reasons are needed, namely alternative reasons and cumulative reasons. Alternative reasons are reasons that can be followed from one of several reasons as stipulated in Article 4 paragraph (2) of the Marriage Law, while cumulative reasons are several reasons that must be complied with by the husband if he wants to practice polygamy as stipulated in Article 5 paragraph (1) of the Marriage Law [11]. The cumulative reason as stipulated in Article 5 paragraph (1) of the Marriage Law stipulates that "A husband who is going to be polygamous must meet the requirements that have been set, namely asking for an application to the Court." To ask for permission to the Court, he must meet several of the following requirements [12]:

1) There is a statement of consent from a wife or wives;
2) There is a guarantee of certainty that the husband concerned is willing and able to meet the needs of his wives and children;
3) Certainty that the husband can be fair to his wives and children.

The wife's permission letter and a statement of the husband's willingness to provide for his wife and children are required to prove the reasons listed in Article 5 paragraph (1) of the Marriage Law in court [11]. Meanwhile, Article 4 paragraph (2) of the Marriage Law provides for alternative reasons, and the court can only allow a husband to engage in polygamy if his wife: a. Unable to carry out his obligations; b. Experiencing a physical disability or suffering from certain diseases that are difficult to cure; c. Unable to bear children.

Based on Article 402 and Article 403 of Law Number 1 of 2023 as amended in Law Number 1 of 2026 concerning Criminal Adjustment (National Criminal Code), it marks an important change in the way the state views violations of marriage law, including the practice of polygamy carried out outside the provisions of the law. Article 402 of the National Criminal Code:

(1) Sentenced to imprisonment for a maximum of 4 (four) years and 6 (six) months or a maximum fine of category IV, each person who:
   a. to carry out the marriage, even though it is known that the existing marriage is a legal obstacle to the marriage taking place; or
   b. carry out the marriage, even though it is known that the existing marriage from the other party is a legal obstacle to the marriage.
(2) If each person as referred to in paragraph (1) a conceals from the other party that the existing

> marriage is a legal obstacle to the marriage taking place, he shall be punished with imprisonment for a maximum of 6 (six) years or a maximum fine of category IV.

Article 402 paragraph (1) of the National Criminal Code aggravates the criminal threat if the perpetrator actively hides the existing marital status from other parties. This element of "concealment" is particularly relevant to the practice of illegal polygamy, where husbands often do not inform the second or first wife-to-be about the actual marital status [13].

Article 402 of the National Criminal Code regulates criminal acts against the provisions of the marriage law, focusing on situations where a person is married even though he knows that there is a legal obstacle from a previous marriage. Article 402 paragraph (1) of the National Criminal Code states that anyone who enters into a marriage even though he knows that there is a legal obstacle due to an existing marriage, can be subject to a prison sentence of up to 4 years and 6 months or a category IV fine. This applies either if he himself has an obstructive marriage (letter a) or knows that the marriage of another party is a legal obstacle (letter b). Article 402 paragraph (2) of the National Criminal Code adds that if a person conceals the existence of a marriage that is a legal obstacle to another party, then the punishment imposed can be heavier, namely imprisonment of up to 6 years or a category IV fine (Rp200 million). This article aims to maintain the integrity of the institution of marriage. The fairly severe punishment, in the form of imprisonment of more than 4 years and a category IV fine (Rp200 million), shows the seriousness of the law in dealing with this kind of offense. The second paragraph even increases the severity of punishment for perpetrators who hide important information about their previous marriage from their prospective spouse, emphasizing the importance of transparency and honesty in marriage. However, the application of this article will depend heavily on proving the fact that the perpetrator is aware of the existence of a legal barrier from a previous marriage. Therefore, law enforcement needs to be supported with strong evidence collection and verification procedures so that the law can be enforced fairly and effectively [14, pp. 414–416].

Article 403 of the National Criminal Code states that: "Any person who enters into a marriage and does not inform the other party that there is a valid obstacle, and based on that obstacle the marriage is then declared invalid, shall be punished with imprisonment for a maximum of 6 (six) years or a maximum fine of category IV." Article 403 of the National Criminal Code complements this arrangement by emphasizing the obligation to notify the existence of a legal obstacle to marriage. This article affirms that any person who enters into a marriage without notifying the existence of a valid obstacle, and then the marriage is declared invalid, can be punished. In the context of polygamy, this provision expands the scope of legal protection for the wife, as it focuses not only on the status of the perpetrator, but also on the legal consequences of the invalidity of the marriage that are detrimental to the other party. Normatively, Article 402 and Article 403 of the National Criminal Code shift illegal polygamy from just an administrative or civil problem into the criminal realm [13].

Article 403 of the National Criminal Code regulates the legal consequences for a person who enters into a marriage without notifying of a valid barrier, which can lead to the invalidity of the marriage. A legal barrier refers to certain conditions that, according to the marriage law, must be met in order for a legally valid marriage to take place. There is an obligation for individuals to inform of the existence of a valid barrier before taking place in marriage. If this obligation is ignored and the marriage is later declared invalid, the perpetrator can face imprisonment of up to 6 years or a fine of up to category IV (Rp200 million) [14, pp. 414–416].

3.2 Protection of Women in the Philosophical Order and Court Decisions on the Crime of Remarriage Without Permission

Marriage or *pawiwahan* in Hinduism is seen as a *yadnya* and a form of dharma implementation. This ceremony marks the beginning of Grahasta Asdor, which is the stage of married life in the teachings of Chess Asdor. According to Lontar Agastya Parwa, the main purpose of *pawiwahan* is to realize a life called Yatha Sakti Kayika Dharma, which means to carry out dharma according to one's own abilities [15]. In Hindu society, the value of the institution of marriage increases due to its religious foundation. Hindu marriage is heavily based on traditions, sacraments, and religious activities. It was once known that Hindu marriage was necessary to give birth to a son. The main purpose of Hindu marriage is based on the Dharma, but nowadays the concept is changing day by day in modern society. Although Kama or sexual intercourse is one of the important motifs of Hindu marriage, it is less prioritized [16].

In Hindu philosophy, polygamy is allowed as long as it is allowed by the existing wife or wives. Krishna Brahmacari or Tresna Brahmacari means that a person is allowed to marry more than once with a maximum limit of four times. This is done on the condition that his first wife cannot give birth to any offspring, cannot play the role of a wife (e.g. is seriously ill), and has been approved to perform a second marriage. This Brahmacari is listed in the fragment of Slokantara 1, namely: "… Krishna Brahmacari is a person who marries at most four times, and no more. Who is used as an example in this case? It is none other than Sang Hyang Rudra who has four goddesses, namely Goddess Uma, Goddess Ganga, Goddess Gauri, and Goddess Durga. The four true goddesses are only four aspects of one, this is what the practitioner of Krishna Brahmacari imitates. As long as he knows the time and place in relation to his wives …" [17].

The prohibition of polygamy without permission is a protection for women. In Hinduism, women have an honorable and holy position even in worshipping God in the form of women whose aspects are "noble mothers" such as Sarasvati, Laksmi, and Durga. This is emphasized by Svami Vuvekananda's statement that "it is impossible for a bird to fly with only one wing". This means that the position or position of a woman is highly respected because every woman is the embodiment of a noble mother so Hindus consider that men and women are two wings in the same bird. The role of women as mothers is stated in Manawa Dharmasastra Chapter II Sloka 55 namely "Prajnarthan mahabhagah Pujarha grhadiptayah Striyah sriyasca gehesu Nawise so stri kascam". This means that among the women who are destined to conceive children who guarantee meritful grace, who are worthy of worship and enliven their dwelling and among the goddesses who bless a man's house, there is no difference between them [18].

In essence, the law has elements including statutory law, treaty law, jurisprudence law, customary law, and doctrinal law. Ideally, these elements should be harmonious, meaning that there is no vertical or horizontal conflict between one legislation and another, the language used must be clear, simple, and precise because the content is a message to the citizens of the community affected by the legislation. In law enforcement, according to Friedman's framework, law must be interpreted as a content *of law*, structure *of law*, and culture *of law* [19, p. 26].

Marriage and its problems in Indonesia are juridically formally regulated in Law Number 1 of 1974 concerning Marriage, Government Regulation Number 9 of 1975 concerning the Implementation of Law Number 1 of 1974 and the Compilation of Islamic Law (KHI) as a guideline for Muslims in Indonesia. One of the principles of marriage according to the Indonesian legal system is the principle of monogamy, which means that by the law that applies in Indonesia a man can only have one wife, and vice versa a woman can only have one husband. To this principle of monogamy by law an exception is opened in the sense that in

very special matters, polygamy (having more than one wife at the same time) is still allowed as long as it meets certain conditions, reasons and procedures [19, p. 26].

MacCormick argues that naturally, the law justified by the *harm principle* in giving an interpretation of harm does coincide with the widely held doctrine of dangerous behavior. Criminal law insofar as it is related to the prevention of harmful behavior that is directed to protect the legitimacy of interests based on certain moral politics. In criminalization, the *harm principle* becomes a discussion or question as in violent violations and a new concept of *trespass*. In addition, democratic and political principles related to democratic representation are also questioned regarding theory and practice in justifying the application of criminal law [20].

One way to defend human rights violated by others is through legal protection, which is given to the community to ensure that they can exercise all their legal rights. Legal protection is one of the state's responsibilities to ensure the implementation of security, safety and justice in society. Philipus M. Hadjon stated that legal protection is divided into 2 (two) forms, namely preventive legal protection and repressive legal protection. Preventive legal protection is legal protection that seeks to avoid problems or differences of opinion by providing opportunities for legal subjects to voice their objections or opinions before a government decision takes a final form, while repressive legal protection is a form of resolving a problem or dispute that has already occurred [21].

If you look at alternative and cumulative conditions as stipulated in Article 4 and Article 5 of the Marriage Law, these conditions are a form of preventive legal protection, especially for women so that husbands continue to respect their position as a wife. There are a number of strategies regulated in laws and regulations to overcome the problem of polygamy carried out by husbands that are not in accordance with applicable legal regulations. With criminal sanctions, husbands who engage in illegal or non-compliant polygamy can be sanctioned [22], as stipulated in Article 402 of Law Number 1 of 2023 as amended in Law Number 1 of 2026 concerning Criminal Adjustment.

In the event that the husband performs a second marriage but does not follow the applicable legal procedures, namely without the consent of the first wife either orally or in writing and without permission from the Court, then the first wife can apply for the annulment of the second marriage. Annulment of marriage is an action taken if the marriage has already been performed even though the parties do not meet the conditions of marriage. A marriage can be annulled if there is a decision of the Religious Court that has permanent legal force and is valid from the time of the marriage [23]. In Article 25 of the Marriage Law and Article 74 of the Compilation of Islamic Law, "the annulment of marriage is carried out by requesting an application for annulment of marriage to the Court in the area where the married couple lives, the residence of the husband or wife and/or in the area where the marriage takes place." The things that cause marriage to be invalid according to the Marriage Law and according to Islamic religious law are [24]:

1) The party who enters into the marriage is still bound to one of the parties and on the basis of the existence of the marriage, they want to annul the new marriage;
2) The marriage is carried out in the presence of an unauthorized marriage registrar, an invalid marriage guardian, and not attended by 2 (two) witnesses;
3) The marriage is carried out under the threat of violating the law or at the time of the marriage, prejudice occurs.

Article 26 Paragraph (2) of the Marriage Law stipulates that "The right of husband and wife to apply for the annulment of marriage can be lost or lost if they have lived together as husband and wife and can show that the marriage certificate made by an unauthorized marriage registrar and the

marriage must be renewed to be valid." However, if you look at the case in Decision Number 1106/Pdt.G/2024/PA. Cbn, the second marriage carried out by the husband with another woman is indeed legally valid because there is already a Marriage Certificate issued and recorded by the Rumpin KUA, but because after further examination with the submission of a marriage annulment by the first wife that the registration of the second marriage carried out by her husband is not in accordance with the requirements in the laws and regulations and even at the time of the registration application has submitted false documents such as the Wife's Death Certificate, and the KUA Rumpin also does not deny the discovery of the fact and supports the first wife's side, so it is appropriate for the judge to grant the first wife's application and declare that the second marriage carried out by her husband is invalid [25].

4. CONCLUSION

The regulation of the crime of remarriage without permission in the Indonesian legal system affirms the principle of monogamy as a basis, by providing a very strict exemption from polygamy through administrative and judicial requirements to protect women's rights. The practice of second marriage without a license, which is often carried out through marriage under the hand or with the concealment of the previous marital status, is a violation of the law that is now not only administrative or civil in dimension, but has also been qualified as a criminal offense based on the provisions of Articles 402 and 403 of the National Criminal Code. This provision strengthens legal protection, especially for women, both preventively through the requirements of polygamy and repressively through criminal sanctions and mechanisms for annulment of marriage in court. Thus, the law serves to maintain justice, certainty, and transparency in the institution of marriage and to provide guarantees of protection for those harmed by the practice of illegal marriage.

REFERENCES

[1] V. Swislyn, *Distribution of Joint Property in the Perspective of National Law and Customary Law*. Jakarta, Indonesia: PT Gramedia, 2020.

[2] Law of the Republic of Indonesia Number 16 of 2019 concerning Amendments to Law Number 1 of 1974 concerning Marriage, 2019.

[3] M. Isnaeni, *Indonesian Marriage Law*. Bandung, Indonesia: Refika Aditama, 2016.

[4] E. I. Rohmah, "The problem of polygamy in across history and religion," *Al-Qanun: Journal of Islamic Law Thought and Reform*, vol. 25, no. 1, pp. 83–97, 2022.

[5] K. K. Bhattacharyya, "The sacred relationship between marriage, spirituality and healthy aging in Hinduism," *Journal of Religion, Spirituality & Aging*, vol. 32, no. 2, pp. 135–148, 2020.

[6] A. Rofiq, *Islamic Civil Law in Indonesia*. Jakarta, Indonesia: PT RajaGrafindo Persada, 2015.

[7] C. H. Sekoh, E. R. Palendeng, and J. E. Londa, "Juridical study of husbands remarrying (polygamy) without the consent of the first wife reviewed from Law Number 1 of 1974 concerning Marriage," *Lex Privatum*, vol. 9, no. 2, p. 130, 2021.

[8] Mardani, *Islamic Family Law in Indonesia*. Jakarta, Indonesia: Kencana, 2016.

[9] N. I. Sari, "Legal protection for the second wife who is polygamous without the permission of the first wife," *Journal of Law (Journal of Legal Sciences)*, vol. 7, no. 2, 2021.

[10] A. Manan, *Islamic Civil Law in Indonesia*. Jakarta, Indonesia: Kencana Prenada Media Group, 2010.

[11] M. Mansari, Z. Fatahillah, and S. Sahara, "Waiver of alternative polygamy requirements as a basis for granting applications (Study of Decision Number 272/Pdt.G/2023/MS. Bna)," *Judicial Journal*, vol. 16, no. 3, pp. 361–379, 2023, doi: 10.29123/jy/v16i3.659.

[12] Rudi and S. P. Suci, "Illegal polygamy according to Law No. 1 of 1974," *Istinbath Journal of Islamic Law Research*, vol. 13, no. 1, pp. 91–121, 2018.

[13] D. Riyani, "Illegal polygamy in the era of the new penal code: Protection of wives' rights and the enforcement direction of Articles 402–403 of Law Number 1 of 2023 on the Criminal Code," *Devotion: Journal of Research and Community Service*, vol. 7, no. 3, 2026.

[14] E. O. S. Hiariej and T. Santoso, *Annotations of the National Criminal Code*. Depok, Indonesia: PT RajaGrafindo Persada, n.d.

[15] I. K. K. Yase, "A review of Hindu law on polygamous marriage in the perspective of dharma and justice," *Satya Dharma: Journal of Legal Sciences*, vol. 8, no. 2, pp. 603–620, 2025.

[16] H. Gupta and Y. Singh, "Emerging trends of Hindu marriage and their impact," *AD Valorem: Journal of Law*, vol. 6, no.

2, 2019.
[17] N. K. K. M. Dwisangga and I. G. A. Wisudawan, "Juridical review of polygamy permits according to marriage law and Hindu law," *Widya Kerta Journal of Hindu Religious Law*, vol. 6, no. 1, pp. 42–59, 2023.
[18] I. G. A. Aditi, "Polygamous marriage and the psychological influence on wives and children in Hindu families in Mataram City," *Journal of Hindu Religious Law Widya Kerta*, vol. 2, no. 1, pp. 1–13, 2019.
[19] H. Sasangka, *The Law of Proof in Civil Cases for Students and Practitioners*. Bandung, Indonesia: Mandar Maju, 2005.
[20] D. G. M. Putra Azwan, "Juridical analysis of the regulation of marriage without the consent of the first wife according to Article 279 of the Criminal Code based on the decision of the Supreme Court Number: 75 K/PID/2016 & 168 K/MIL/2016," *JOM Faculty of Law, University of Riau*, vol. 8, no. 2, 2021.
[21] D. A. Prayoga, J. A. Husodo, A. Elok, and P. Maharani, "Legal protection of citizens' rights with the enactment of Law Number 23 of 2019 concerning national resource management," *Souvereignty: Journal of Democracy and National Resilience*, vol. 2, no. 2, pp. 188–200, 2023.
[22] Rochxy and B. Lesmana, "Criminalization of perpetrators of marriage under the hands of the first wife," *Judicial Journal*, vol. 6, no. 3, pp. 250–266, 2013.
[23] M. Y. Siregar, "Criminal sanctions against polygamous marriage without the consent of the wife," *Scientific Journal of Advocacy*, vol. 5, no. 1, pp. 52–73, 2017.
[24] A. Ichsan, *Marriage Law for Muslims*. Jakarta, Indonesia: Pradnya Paramita, 1986.
[25] V. F. H. Raehany, "Legal protection of wives over polygamous husbands without the consent of the wife and the court," *R2J: Ranah Research Journal*, vol. 7, no. 2, 2025.
[26] E. Masri, "Polygamy in the perspective of Law Number 1 of 1974 concerning marriage and the Compilation of Islamic Law (KHI)," *Krtha Bhayangkara Journal*, vol. 13, no. 2, p. 234, 2019.