

How Far Could Someone Talk About Someone Else's Religion? (A Case Study of Yahya Waloni)

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Abstract

The problem addressed in this article is: to what extent can someone speak about another religion's beliefs in Indonesia? This study aims to identify the limitations imposed on individuals who discuss the beliefs of other religions. The article is a normative legal study conducted through a case study, specifically examining the case of Muhammad Yahya Waloni, who was accused of hate speech or blasphemy for claiming that the Bible is fake. The findings indicate that individuals are free to discuss another religion's beliefs, even if their statements contradict those beliefs, as long as they ensure that such discourse does not spread to followers of the religion in question. If such speech is disseminated and adherents of the religion perceive it as offensive or blasphemous, the speaker may be held accountable for failing to prevent its spread.

Keywords: Freedom of speech; Muhammad Yahya Waloni; Religion.

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Introduction

Muhammad Yahya Waloni was accused of violating laws related to hate speech and blasphemy due to his statement that the Bible is not only fictitious but also fake. He was charged under Article 28(2) in conjunction with Article 45a(2) of the Electronic Information and Transactions (ITE) Law, which prohibits the dissemination of information containing hate speech based on ethnicity, religion, race, and intergroup relations (SARA). Additionally, he was charged under Article 156 of the Indonesian Penal Code (KUHP) on blasphemy. The report against him was filed by the 'Komunitas Masyarakat Cinta Pluralisme,' a civil society organization advocating for pluralism.

On the other hand, Yahya Waloni defended his statement by emphasizing that he made it as a Muslim cleric (ustad) and that it was based on his personal beliefs, supported by what he claimed to be strong evidence. From a religious standpoint, he may have viewed his statement as valid. However, the issue arose when other groups perceived his remarks as potentially disrupting social harmony, contradicting Indonesia's pluralistic values, and, for Christians, constituting blasphemy against their religion. The case highlights the tension between religious freedom and the need to maintain societal harmony in a diverse nation like Indonesia.

The public prosecutor demanded a seven-month prison sentence for Yahya Waloni. On January 11, 2022, the Panel of Judges sentenced him to five months in prison and imposed a fine of IDR 50 million, with a subsidiary penalty of one additional month in prison for failure to pay the fine. The court's decision considered Yahya Waloni's remorse and his public apology to Christians as mitigating factors. The case reached a final and binding verdict, and he completed his sentence on January 31, 2022. This ruling demonstrates the legal consequences of speech that is deemed offensive or harmful to religious harmony in Indonesia.

This case presents a dilemma between the right to express religious beliefs and the potential for such expressions to offend others. On one side, individuals like Yahya Waloni believe they have the right to articulate their religious views, even if those views contradict other faiths. On the other hand, statements that challenge or negate the beliefs of another religion may be perceived as offensive, leading to societal discord. This raises fundamental questions: Should individuals refrain from expressing their religious beliefs if doing so contradicts another faith? Does freedom of speech extend to religious expressions that may be deemed offensive? These questions highlight the need for a clear legal framework to define the boundaries of religious discourse in Indonesia.

Indonesia guarantees religious freedom and freedom of expression under its constitution. However, the country's pluralistic society also requires protections against statements that may incite hatred or disrupt harmony. In cases like Yahya Waloni's, civil society groups argue that certain statements can endanger social cohesion in a multicultural nation. The challenge lies in balancing individual rights with the collective need for religious tolerance. Legal clarity is essential to ensure that individuals can express their beliefs while respecting the rights of others.

The question of how freely one can speak about another religion is a crucial topic, especially in a country that officially recognizes six religions. The potential for conflict is high when individuals from one faith publicly discuss or critique another religion in a manner that its followers may find offensive. At the same time, such statements often reflect personal religious interpretations, making the issue complex. Given these challenges, this study aims to explore the legal framework governing religious speech and the extent to which individuals are legally permitted to discuss religions they do not adhere to.

The primary objective of this research is to identify the legal boundaries for expressing opinions and interpretations about religions one does not follow. This study can serve as a valuable reference for further research on hate speech and blasphemy. Additionally, it may contribute to the development of future

legislation that clarifies the limits of religious expression while upholding the principles of pluralism and religious harmony in Indonesia.

Method

Nalle mentions that although the interpretation of religious doctrines is part of the freedom within the *forum internum*, such interpretation must be based on the fundamental doctrines of the religion and conducted through proper methods recognized by religious sources. Therefore, freedom of interpretation within a religion is not absolute. An interpretation that lacks reference to methods acknowledged by religious adherents and is not based on scriptural sources may provoke reactions that threaten security and public order, especially when presented or performed in public. However, the Constitutional Court's considerations raise further questions: What constitutes a correct method of interpretation? Is a commonly accepted method among religious adherents necessarily true? The Court has, in effect, imposed limitations on the degrees of truth in interpreting religious doctrines. Interpretation of religious doctrine is thus regarded as pragmatic truth, shaped by intersubjectivity and determined by public opinion.¹

The above statement highlights the need for a more reliable source of interpretation when discussing other religions. Another critical issue is the choice of the appropriate forum for conveying such interpretations. This further supports the investigation into the extent to which individuals are legally permitted to speak about other religions, which remains the central issue of this research. To address the question of how far someone can discuss another religion, this study employs a legal research method with a case study approach, utilizing secondary data from literature, relevant laws, and doctrinal sources.

Discussion

Talking about something as part of a citizen's right is commonly referred to as freedom or liberty of speech. According to Dworkin, liberty of speech is understood in terms of equality: the public should have access to all information and viewpoints, and participation in public discourse should be available to all. Dworkin's approach aligns with Rawls' view that the constitution must take steps to enhance the value of equal participation rights for all members of society. For Rawls, there must be a fair opportunity for individuals to take part in and influence the political process. He argues for a principle of equal liberty, which, when applied

¹ Victor Imanuel W. Nalle. *Blasphemy Law and Public Neutrality in Indonesia* (London: Mediterranean Journal of Social Sciences Volume 8, no. 2, 2017), 57–62.

to the political process, is understood as a principle of equal participation. This principle requires that all citizens have an equal right to take part in and determine the outcome of the constitutional process that establishes the laws to which they must adhere.²

The right to freedom of speech, as part of the broader freedom of expression, is a fundamental element in recognizing the sovereignty of the people in a democratic state. As a constitutional democracy, Indonesia upholds the protection of human rights, as evidenced by the inclusion of the right to freedom of speech in Article 28E paragraph (3) of the 1945 Constitution and the ratification of the Universal Declaration of Human Rights (UDHR). Furthermore, the right to freedom of opinion is specifically regulated in a separate law, namely Law Number 9 of 1998 on Freedom of Speech. Although this law does not govern the expression of opinions through mass media—both print and electronic—it guarantees every citizen's right to express their thoughts orally and in writing, freely and responsibly, within the framework of prevailing laws and regulations.³

It is affirmed that the state is responsible for ensuring that citizens can exercise their right to free speech. However, it is also undeniable that the rights of others must be equally protected. A statement may be perceived as offensive when it contradicts the beliefs of others, as seen in the case of Yahya Waloni. His statement declaring the Bible to be fake was, on one hand, an expression of his opinion, but on the other hand, it had a significant potential to offend others, particularly Christians.

The offense toward another person's religious beliefs, as seen in the Yahya Waloni case, led to his being accused of hate speech or blasphemy. The term "hate speech," which lacks a precise definition in conventional international law, carries a dual ambiguity. Its vagueness and the absence of a universally accepted meaning make it susceptible to misuse, allowing authorities to suppress a wide range of lawful expressions. Many governments employ the concept of "hate speech" in much the same way they use "fake news"—to target political opponents, dissenters, non-believers, and critics. However, the phrase's perceived weakness ("it's just speech") also appears to hinder governments and companies from addressing genuine harms, such as speech that incites violence or discrimination against

² Yasmin Dawood. *Democracy and the Freedom of Speech: Rethinking the Conflict between Liberty and Equality*. (Quebec: Canadian Journal of Law and Jurisprudence Volume 26, no. 2, 2013), 293–311.

³ Titis Anindyajati. *Limitation of the Right To Freedom of Speech on the Indonesian Constitutional Court Consideration*. (Salatiga: Indonesian Law Journal Volume 14, no. 1, 2021), 19–36.

vulnerable groups or silences marginalized communities. This situation has led to widespread public frustration, particularly in response to unchecked online abuse.⁴

Hate speech can be broadly defined as a speech act that antagonizes or marginalizes people based on their identification with a particular social or demographic group. It arises from communication processes that undermine human dignity, equality, and human rights. However, defining hate speech remains contentious and problematic, as it requires balancing the need to identify harmful speech—which has the potential to marginalize individuals or groups—while ensuring that speech contributing to pluralistic debate is not unjustly restricted. The examination of hate speech is highly contextual, making it difficult to define in absolute terms without engaging in complex philosophical discussions on belonging, freedom of expression, and dignity within a particular culture or society. Furthermore, its interpretation can be influenced by a country's unique media landscape, especially in the digital age, where social media amplifies its reach and impact.⁵

This study examines whether Yahya Waloni's statement can be classified as *hate speech*. The ambiguity surrounding the term often equates it with *fake news*, yet the issue lies in the fact that Yahya Waloni likely believed that what he said was not fake—hence his bold assertion that the Bible is false. From his perspective, this must have been a truth. Conversely, for Christian believers, such a statement is entirely false. This difference in perspectives creates an ongoing contradiction, as both religions hold fundamentally different views and positions regarding the truth of their respective holy books. To approach this situation, the following discussion will refer to Jeffrey Howard's statement below:⁶

"Although free speech is an important value," writes Parekh (2012, p. 45), "it is not the only one." This common suggestion is that our commitment to free speech must be balanced when its demands conflict with other normative commitments, such as the social equality, dignity, or security of historically marginalized citizens.

The statement above illustrates the significance of freedom of speech, emphasizing that Indonesia is justified in granting and safeguarding this right by enshrining it in the Constitution. However, limitations must be imposed, particularly when a statement or speech conflicts with differing opinions or beliefs.

⁴ David Kaye. *Promotion and protection of the right to freedom of opinion and expression : note / by the Secretary-General*. (New York: United Nations, 2019).

⁵ Charlotte Elliott, Wallace Chuma, and Yosra El Gendi. *Key Concept Paper*. (Leeds: Media, Conflict and Democratisation (MeCoDEM), 2016).

⁶ Jeffrey W. Howard. *Free Speech and Hate Speech*. (San Mateo: Annual Review of Political Science, 2019), 93–109.

This underscores the necessity for individuals to be mindful of their words. If they are aware that their statements may harm the beliefs or feelings of others, they are obligated to refrain from making such remarks.

Another possible accusation against Waloni was blasphemy. According to the *Merriam-Webster Dictionary*, blasphemy is defined as: (1) the act of insulting, showing contempt for, or lacking reverence toward God; (2) the act of claiming the attributes of deity; and (3) irreverence toward something considered sacred or inviolable. The Committee on Culture, Science, and Education, in its report on blasphemy, religious insults, and hate speech based on religion, defines blasphemy as an offense that involves insulting or showing contempt for God and, by extension, anything deemed sacred.⁷

In a broad sense, blasphemy pertains to insults directed at deities and sacred entities. More specifically, it consists of “the use or abuse of language or behavioral acts that scorn the existence, nature, or power of sacred beings, objects, or texts.” Accordingly, blasphemy may not only target God but also other sacred figures and items, such as the Virgin Mary, the Prophet Muhammad, a crucifix, or the Holy Scriptures.⁸ Cultural anthropologist Saba Mahmood argues that blasphemy is perceived as causing “physical injury,” making it an intolerable offense that harms both God and the faithful community.⁹

Blasphemy laws are often vague and difficult to codify for analytical purposes.¹⁰ However, general findings indicate that such laws frequently deviate from international legal standards on human rights and freedom of expression. Blasphemy is essentially—though not exclusively—a crime committed through statements deemed offensive, which in turn restrict freedom of expression. Simply put, it constitutes a “linguistic offense” involving the contested use of language concerning the sacred. Any law seeking to regulate such matters must balance its objectives against the fundamental human rights it restricts.¹¹ Blasphemy is not

⁷ Venice Commission. *Blasphemy, Insult and Hatred: Finding Answers in a Democratic Society*. (2010), <http://books.google.com/books?hl=en&lr=&id=DM1mWrFLhioC&pgis=1>.

⁸ Christoph Baumgartner. *Blasphemy as Violence: Trying to Understand the Kind of Injury That Can Be Inflicted by Acts and Artefacts That Are Construed as Blasphemy*. (Leiden: Journal of Religion in Europe Volume 6, no. 1 2013), 35–63.

⁹ Hary Widiantoro and Fredy Torang W Munthe. *Monopolizing Religious Blasphemy Law Interpretation in Indonesia: The Strategy of Lawfare and the Exercise of Power*. (Samarinda: Mazahib Volume 18, no. 2, 2019), 201–228.

¹⁰ Adam Tyson. *Blasphemy and Judicial Legitimacy in Indonesia*. (Belgrade: Politics and Religion Volume 14, no. 1 2021), 182–205.

¹¹ Belachew Mekuria Fikre. *Blasphemy in a Secular State*. (Ethiopia: Mizan Law Review, 2013), 29–48.

only concerned with religious sensibilities but also with protecting entire segments of the population from discrimination.¹²

Based on the definitions and interpretations above, blasphemy pertains to statements about God and, in a more structured context, religion. The defining characteristic of blasphemy is that it constitutes an intolerable offense that harms both God and the religious community. In this regard, blasphemy involves any comment or action concerning God and the religious community that contradicts their beliefs. Blasphemy is a narrower concept, as it focuses solely on offenses against God and religious communities, whereas *hate speech* is broader and extends beyond religious matters.

Freedom of speech is a fundamental right. However, as previously discussed, this right must not violate the law, which seeks to protect the rights of all individuals—including the right to be respected, not only as individuals but also in relation to their beliefs. This issue is of global concern, affecting not only Indonesia but also Western countries. Heinze, as cited in Asogwa and Unwuama, argues that because most Western democracies assume the existence of value pluralism, they expect their legislatures and courts to impose limitations on democratic freedoms in order to safeguard the rights of other citizens. This perspective suggests that democracy itself must sometimes be restricted to preserve and strengthen democratic ideals. By way of comparison, Heinze notes that hate speech bans, much like the doctrines of separation of powers and constitutional checks and balances, are designed to protect vulnerable groups. He further asserts that "no modern democracy, for example, could legitimately hold an election on whether an individual criminal suspect ought to be found guilty." This reasoning underlies international agreements such as the European Convention on Human Rights and the constitutional jurisprudence of various countries that favor regulating hate speech. In countries that support hate speech regulation, factors such as equality, multiculturalism, dignity, personal authenticity, and collective concerns play a significant role in advocating for speech restrictions. Despite these arguments in favor of restricting hate speech to balance freedom of speech with the right to equality and non-discrimination, opponents of such restrictions continue to argue for the protection of free expression.¹³

Nonetheless, under international human rights law, the right to freedom of expression may be restricted to protect, among other things, the rights of others

¹² Rebecca Ross. *Blasphemy and the Modern, 'Secular' State*. (Victoria: Appeal Review of Current Law and Law Reform Volume 17, 2012), 3–19.

¹³ Nicholas Uchechukwu Asogwa and Michael Emeka Onwuama. *Hate Speech and Authentic Personhood: Unveiling the Truth*. (Oaks: SAGE Open Volume 11, no. 1, 2021).

and public order, provided such restrictions are "necessary in a democratic society" and established by law. This principle is reflected in both the UN Covenant on Civil and Political Rights and the European Convention on Human Rights. The protection of religious rights may fall under the category of "the rights of others" that warrant legal protection. Regarding freedom of religion, international human rights law also imposes restrictions using language similar to that governing freedom of expression: the freedom to manifest one's religion or beliefs may be subject to limitations prescribed by law that are necessary to protect public safety, order, health, morals, or the fundamental rights and freedoms of others.¹⁴

What is the best way to accommodate freedom of speech while simultaneously respecting the rights of others? In the case of Yahya Waloni, how far can someone discuss the beliefs of another religious community that differs from their own? As previously explained, everyone has the right to freedom of speech and, at the same time, the right to freedom of religion. As individuals adhere to a particular faith, it is natural for them to learn and explore their own religion. In the process of seeking truth, they may compare their beliefs with those of other religions. Through this process, they might perceive other religious teachings as false, reinforcing their own faith. This study views such a situation as a normal occurrence, as different religions hold different values, and adherents of one religion naturally reject the doctrines of another.

The challenge lies in determining the extent to which individuals can publicly discuss the beliefs of others, given that every religious community is also entitled to protection against insults or attacks on their faith and scriptures. As previously mentioned, expressing opinions about another religion may provoke hostility among its adherents, especially if the speech is perceived as an attack or a claim that their sacred texts are false. In this context, this study asserts that speakers must be aware that their statements could incite hostility or provoke strong reactions, as demonstrated in Yahya Waloni's case. Several videos indicate that he was aware his statements might be considered offensive by Christians, yet he deliberately confronted the issue and even challenged people to report him. This demonstrates that while he exercised his right to free speech, he did so with full awareness that his statements would provoke opposition. In such cases, the intention to spread hostility is evident, and the lack of effort to prevent such reactions suggests an intent to incite discord. This kind of moral irresponsibility

¹⁴ Agnes Callamard. *ARTICLE 19: Freedom of Speech and Offence: Why Blasphemy Laws Are Not the Appropriate Response*. (Equal Voices, no. 18, 2006), <http://eumc.europa.eu/eumc/material/pub/ev/ev18/ev-18.pdf>.

poses potential harm and should therefore be considered a disruption to public order, warranting legal intervention in the form of sanctions.

Indonesia upholds strong values in respecting freedom of speech. *Pancasila*, as the nation's philosophical foundation, emphasizes this in its second principle: "Just and Civilized Humanity." *Pancasila* recognizes freedom of speech as an integral part of respecting humanity and justice. Citizens are free to express their opinions, including in public spaces, and are guaranteed equal rights in exercising this freedom. However, the freedom granted by *Pancasila* is not absolute; it is subject to limitations concerning the rights of others. Every country has its own values and characteristics, and Indonesia explicitly identifies itself as a nation that believes in God. Moreover, the country acknowledges multiple religions—currently recognizing six official religions—each with different practices and doctrines. Consequently, the freedom of speech provided by *Pancasila* must also respect the religious beliefs of others. The first principle of *Pancasila*, "Belief in One God," implies an obligation to ensure that freedom of expression does not infringe upon the religious rights of others, allowing all citizens to practice their faith in accordance with the nation's foundational values.

In a more juridical context, the concept of humanity concerning freedom of speech has been regulated in several laws. In the era of technology, speech is no longer confined to direct verbal communication but can also be disseminated through social media platforms. Consequently, regulations on speech in online platforms have also been established. Article 28 in conjunction with Article 45 of the Law on Information and Electronic Transactions (*Undang-Undang Informasi dan Transaksi Elektronik* or UU ITE) seeks to address the dissemination of hate speech. However, a significant challenge arises in defining the term "*the one who spreads*" hate speech. If a statement containing hate speech is initially made by one person but then widely disseminated by others, does the original speaker still bear legal responsibility? The approach taken in the case of Yahya Waloni was to apply Article 156 of the *Kitab Undang-Undang Hukum Pidana* (KUHP), which penalizes individuals whose statements can be considered blasphemous.

This study argues that speakers must be held accountable for the foreseeable effects of their speech. They have an obligation to take reasonable measures to prevent disorder arising from their statements. In this regard, it is undeniable that religious leaders frequently speak about their own faith, and comparisons with other religions may naturally occur as part of theological discourse and study. Such discussions are normal and expected. However, religious leaders must ensure that their speeches remain within their own religious communities. If they cannot guarantee this, then they should refrain from making statements about other

religions. If they take appropriate precautions to ensure that their statements are not accessible to followers of other religions, potential conflicts can be avoided. Conversely, if their speech reaches and offends adherents of another faith, social discord may arise. In the case of Yahya Waloni, it was not members of a religious community but rather a civil society organization that reported his statements for allegedly disregarding the principles of multiculturalism. This highlights the necessity for speakers, particularly religious leaders, to be mindful of their language, exercise decorum, and choose their words carefully to avoid unnecessary provocation. By adopting such measures, freedom of speech can be upheld while simultaneously respecting others' rights to dignity and religious belief.

From a practical standpoint, every religious institution should commit to ensuring that any speech delivered within their premises adheres to ethical standards. Speakers should be required to sign a commitment to uphold ethical guidelines in their speech. Additionally, institutions and speakers must take proactive measures to prevent speeches containing references to other religions from being disseminated outside their respective communities. Failure to uphold this responsibility should be considered negligence, with corresponding legal consequences. From a legislative perspective, legal provisions should be established to mandate that religious institutions and speakers acknowledge their duty to prevent the spread of speech that has the potential to incite conflict. Furthermore, within religious institutions themselves, mechanisms should be in place to address concerns raised by participants who may perceive a speaker's statements as containing elements of hate speech or inappropriate content. By enforcing these measures, freedom of speech can be accompanied by a sense of responsibility, ensuring that efforts to maintain social harmony are collectively upheld by all stakeholders, including religious leaders, institutions, law enforcement authorities, and the broader public.

Although statements containing religious offenses can already be prosecuted under Article 156a of the KUHP on blasphemy, additional regulations requiring commitments from religious speakers and institutions are crucial for fostering comprehensive awareness among all stakeholders. Such a legal framework would serve as a preventive solution to reduce the likelihood of hate speech or blasphemy while reinforcing the responsibility of religious speakers and institutions in maintaining public order. This approach underscores that they bear responsibility not only for directly disseminating statements but also for the consequences of their speech when perceived as hate speech by the general public or followers of other religions.

Conclusion

In conclusion, individuals have the right to discuss other religions as part of their freedom of speech, which is protected and recognized by the constitution. However, if such speech becomes known to followers of the religion in question and its content is deemed offensive to their beliefs, it may infringe upon their right to be protected. This contradicts the principle of respecting other religions, as Indonesian philosophy upholds the belief in God, which must be honored by all. Therefore, anyone who wishes to speak about a religion other than their own must make every effort to ensure that their speech does not contain content that could provoke conflict or be disseminated in a way that allows followers of the religion to perceive it as blasphemous. If a speaker takes precautions to keep their statements private but someone else spreads them, it may still be considered negligence in respecting other religions, even if the speaker had no intention of sharing their views publicly. Such actions must be subject to legal consequences for failing to maintain public order, in accordance with applicable laws. In cases where such speech is disseminated through online platforms, the ITE Law may be enforced. Socially, religious institutions must commit to ensuring that any discussions held within their premises, such as places of worship, adhere to ethical guidelines. Speakers should sign a commitment to uphold ethical standards, and both institutions and speakers must take all necessary measures to prevent speech concerning other religions from being disseminated beyond the institution or place of worship.

Suggestion

Every religious institution must establish clear rules for religious speakers, requiring them to commit to preventing their speeches from being accessed by followers of the religion they are discussing. Additionally, national law must explicitly state that anyone who speaks about another religion must take measures to prevent the dissemination of content that contradicts the beliefs of that religion's followers. Therefore, a revision of Indonesian law is necessary—not only to punish those who distribute information containing hate speech but also to hold accountable anyone who speaks about another religion and fails to prevent their statements from being spread and accessed by followers of that religion, who may find the content contradictory to their beliefs and consequently incite disputes and chaos. By implementing such a system, greater awareness and a more prudent approach to discussing other religions will emerge, creating a preventive mechanism against the spread of hate speech and blasphemy. From a cultural perspective, the role of religious institutions must be strengthened. Religious

institutions must establish a system that enforces ethical speech guidelines. Both institutions and speakers must make every effort to ensure that any speech concerning another religion is not disseminated beyond the institution or place of worship. Failure to adhere to this principle should be considered negligence, and those responsible must acknowledge and accept any consequences imposed by the religious institution.

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