

## **Forensic Psychological Evidence in *Ḥaḍānah* Disputes: A Content Analysis of Fifty Indonesian Religious Court Decisions**

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### **Abstract**

This study analyzes how forensic psychological evidence is used in child custody (*ḥaḍānah*) decisions of Indonesian Religious Courts. Prior research suggests judicial inconsistency in accommodating psychological evidence, but no systematic mapping of the pattern exists. This study employs quantitative content analysis of 50 Religious Court and Sharia Court decisions issued between 2015 and 2026, retrieved from the Supreme Court Decision Directory and coded for party characteristics, outcomes, the presence and judicial treatment of psychological evidence, and the *ratio decidendi*. The findings show that custody was awarded to mothers in 58% of cases, consistent with Article 105 of the Compilation of Islamic Law (KHI). Psychological evidence was absent in 86% of cases, and 92% of decisions contained no explicit assessment of its evidentiary weight. In the five cases where psychological evidence appeared, judges used it to prove grounds for divorce, treated it as supporting confirmation, or explicitly set it aside; none constituted a parenting-fitness evaluation meeting forensic standard. The study recommends custody-evaluation guidelines, forensic-literacy training for judges, and a mechanism for appointing psychological experts in *ḥaḍānah* proceedings.

**Keywords:** *ḥaḍānah*; forensic psychology; best interests of the child; Religious Courts; Islamic family law.



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### **Introduction**

The determination of child custody (*ḥaḍānah*) after divorce is among the most consequential decisions in family law, shaping a child's developmental trajectory long after the litigation ends. In Indonesia, Muslim parties bring divorce and custody disputes before the Religious Courts, whose jurisdiction is governed by the Marriage Law (Law No. 1 of 1974), the Child Protection Law (Law No. 35 of 2014), and,

specifically for Muslims, the Compilation of Islamic Law (KHI).<sup>1</sup> Article 105 of the KHI establishes a general presumption that the care of a child who has not yet reached the age of discernment (*mumayyiz*, under twelve years) belongs to the mother, while an older child may choose between the parents. This presumption is not absolute: Article 156 of the KHI permits custody to be transferred when the designated caregiver cannot guarantee the child's physical and spiritual safety. Although these provisions enshrine the "best interests of the child" as the guiding principle, translating that abstract standard into concrete judicial findings frequently requires specialized knowledge of child development and family functioning that legal training alone does not provide.<sup>2</sup>

These three legal frameworks do not merely coexist; they interact hierarchically and functionally in *ḥaḍānah* adjudication. The Marriage Law supplies the general post-divorce framework, obliging both parents to maintain and educate their children (Article 41) without allocating custody by gender; the KHI operationalizes that framework for Muslims through the age-based presumption of Article 105 and the disqualification clause of Article 156; and the Child Protection Law supplies the overriding interpretive principle of the best interests of the child, which the Supreme Court's chamber guidance has increasingly used to justify departures from the KHI presumption where the child's welfare so requires. The evidentiary position of psychological expertise within this structure is equally important. Under the civil procedure applicable in Religious Courts, a psychologist's report enters the record as documentary evidence, and a psychologist may be heard as an expert whose opinion assists the panel; in neither form is the court bound by the expert's conclusions, since judges remain free in their assessment of evidence.<sup>3</sup> Whether psychological findings influence a custody ruling therefore depends on two contingencies: whether a party (or the court) procures the evidence at all, and how the panel chooses to weigh it. Both contingencies are empirical questions that the existing literature has not measured.

Forensic psychology offers precisely this kind of knowledge. Child custody evaluations provide courts with multimethod, multi-tool, and multi-informant assessments of parenting capacity, family dynamics, and the psychological needs of the child.<sup>4</sup> Globally, the practice has evolved from intuitive clinical judgment toward a rigorous, evidence-based forensic model governed by professional guidelines.<sup>5</sup> A growing Indonesian literature, however, indicates that the integration of such

<sup>1</sup>Law of the Republic of Indonesia Number 1 of 1974 concerning Marriage; Law of the Republic of Indonesia Number 35 of 2014 concerning the Amendment to Law Number 23 of 2002 concerning Child Protection; Presidential Instruction Number 1 of 1991 concerning the Compilation of Islamic Law.

<sup>2</sup>Jean Zermatten, "The Best Interests of the Child Principle: Literal Analysis and Function," *The International Journal of Children's Rights* 18, no. 4 (2010): 490–493.

<sup>3</sup>Het Herziene Indonesisch Reglement (HIR), Article 164 on the recognised categories of evidence and Article 154 on the hearing of experts, applied in the Religious Courts pursuant to Law Number 7 of 1989 concerning Religious Courts, as amended by Law Number 3 of 2006 and Law Number 50 of 2009.

<sup>4</sup>J. N. Bow and F. A. Quinnell, "A Critical Review of Child Custody Evaluation Reports," *Family Court Review* 40, no. 2 (2002): 166–170; F. A. Quinnell and J. N. Bow, "Psychological Tests Used in Child Custody Evaluations," *Behavioral Sciences & the Law* 19, no. 4 (2001): 493–497; C. de Ruiter and N. Kaser-Boyd, *Forensic Psychological Assessment in Practice* (New York: Routledge, 2015), 112–118.

<sup>5</sup>American Psychological Association, "Guidelines for Child Custody Evaluations in Family Law Proceedings," *American Psychologist* 65, no. 9 (2010): 863–867.

evaluations into Religious Court practice is inconsistent at best. Case studies report that psychological assessments of children are often submitted but rarely considered in the operative part of decisions,<sup>6</sup> that some rulings award custody contrary to psychological indications of trauma while others follow them,<sup>7</sup> and that judges should examine the objective condition of the child rather than only the parental conflict.<sup>8</sup> Parallel doctrinal work argues that operationalizing *maqāṣid al-sharī'ah* in *ḥaḍānah* cases requires moving from classical *fiqh* presumptions toward contemporary child-centered standards.<sup>9</sup>

These prior studies share two limitations. First, they are built on single decisions or very small sets of decisions, so the scale of the phenomenon they describe cannot be estimated: it remains unknown how often psychological evidence actually enters *ḥaḍānah* litigation, in what form, and with what effect on judicial reasoning. Second, because they are predominantly doctrinal, they document that a normative–empirical tension exists between the textual presumption of Article 105 KHI and psychological accounts of the child’s condition, but they cannot show how judges resolve that tension across a body of decisions. The present study addresses both limitations. It asks a single central question: how do Indonesian Religious Courts position forensic psychological evidence when determining the best interests of the child in *ḥaḍānah* disputes? To answer it, this study systematically codes fifty publicly available Religious Court decisions for the presence, source, and judicial treatment of psychological evidence and for the legal principles constituting the *ratio decidendi*. The central argument advanced is that the gap identified in earlier case studies is not primarily a problem of judges rejecting psychological evidence, but of the evidence almost never being requested or produced in a forensically adequate form, so that the “best interests of the child” standard is applied through legal presumptions and lay inference rather than empirical assessment.

## Research Methods

This study is empirical legal research using quantitative content analysis of court decisions as primary legal materials. The unit of analysis is the individual decision. Fifty unique decisions of first-instance Religious Courts (including one Mahkamah Syar’iyah in Aceh) and appellate Religious High Courts concerning child custody were collected from the Supreme Court of the Republic of Indonesia’s public Decision Directory.<sup>10</sup> Decisions were included when the operative claims involved

<sup>6</sup>A. Lily, W. Waspada, and J. Juliati, “Tinjauan Yuridis terhadap Hak Asuh Anak Berdasarkan Putusan No. 359/Pdt.G/2022/PA.Mks,” *Clavia* 22, no. 1 (2024): 44–47.

<sup>7</sup>Indana Zulfah, Idha Aprilyana Sembiring, and Rosmalinda, “The Role of Child Psychological Test Results in Custody Decisions in Divorce Cases,” *Walisono Law Review* 7, no. 1 (2025): 15–18.

<sup>8</sup>Eka and L. Diah Sugiarti, “Pemberian Hak Asuh Anak kepada Ayah Pasca Perceraian dalam Putusan Pengadilan Agama Kuningan No. 2037/Pdt.G/2028/PA.Kng,” *Al Mashalih: Journal of Islamic Law* 5, no. 1 (2024): 25–30; A. Arbillah, Z. Makkawaru, and K. Kamsilaniah, “Analisis Hukum Pelaksanaan Hak Asuh Anak setelah Putusan Pengadilan Agama Kelas IA Makassar,” *Indonesian Journal of Legality of Law* 5, no. 2 (2023): 208–210.

<sup>9</sup>A. Kadarisman, A. Fedro, and Z. Arifin, “Best Interest of the Child in Islamic Family Law: Integrating Maqāṣid al-Sharī'ah and Double Movement Theory in *Ḥaḍānah* Cases,” *Jurnal Al-Dustur* 8, no. 2 (2025): 163–170.

<sup>10</sup>Direktori Putusan Mahkamah Agung Republik Indonesia, accessed 2026, <https://putusan3.mahkamahagung.go.id/>. The complete list of the fifty decisions forming the corpus is available from the author.

*ḥaḍānah*, whether cumulated with a divorce petition or filed as a stand-alone custody suit after divorce. The corpus spans 2015 to 2026, with the large majority decided in 2025 (27 decisions) and 2026 (21 decisions), and originates from more than thirty court locations across Sumatra, Java, Bali, Kalimantan, Sulawesi, and Aceh, providing geographic variation although not statistical representativeness.

Key variables were defined operationally before coding. “Psychological evidence” was coded as present when the decision recorded any psychologist-produced material, an examination report, evaluation letter, clinical certificate, or in-person expert testimony, regardless of its subject or quality. “Explicit judicial reference” required that the panel mention the material in its legal considerations, not merely list it among exhibits. “Weight” was coded from the considerations as decisive, supporting, set aside, or not assessed. “Conformity with forensic standards” was assessed against the core components of the internationally recognized custody-evaluation model, namely assessment of both parents, direct assessment of the child, multiple methods, and a custody-specific referral question.<sup>11</sup> The *ratio decidendi* was classified by the principal legal bases the panel itself articulated: the religious presumption of the KHI, the best interests of the child, positive-law provisions, procedural grounds, or ratified mediation agreements, alone or in combination.

Each decision was coded on a structured instrument covering four blocks: (1) case characteristics, comprising the parties, plaintiff status, number and ages of children, type of claim, and accompanying issues alleged (domestic violence, infidelity, economic neglect, substance abuse, online gambling); (2) psychological evidence, comprising its presence, type, submitting party, presence of the expert at trial, and conformity with forensic evaluation standards; (3) judicial treatment, comprising explicit reference to the evidence in the legal considerations, the weight assigned, verbatim judicial citations, and the alignment of the outcome with any psychological recommendation; and (4) outcome and reasoning, comprising the custody award, visitation and maintenance orders, and the principal legal bases of the *ratio decidendi*. Coding results were tabulated as frequencies and percentages, and decisions containing psychological evidence were additionally subjected to qualitative analysis of the judges’ reasoning. Because this study analyzes the text of published decisions, its findings describe what courts record in their written considerations; practices that occur at trial but are not memorialized in the decision fall outside its scope, and this is acknowledged as a limitation.

## Results and Discussion

### Patterns of Custody Outcomes and the Persistence of the Maternal Presumption

The distribution of outcomes confirms the continuing force of the maternal presumption in Article 105 KHI. Of the fifty decisions, custody was awarded to the mother in 29 cases (58%), to the father in 5 cases (10%), and divided between the parents in 4 cases (8%), while in the remaining 12 cases (24%) custody was not decided on the merits because the claim was withdrawn, declared inadmissible, lapsed, or resolved outside the operative ruling. Mothers overwhelmingly initiated the litigation: they were plaintiffs in 41 of the fifty cases (82%), typically in a divorce suit cumulated with a custody claim, and obtained custody in 28 of those 41 cases

<sup>11</sup>American Psychological Association, “Guidelines for Child Custody Evaluations,” 864–866.

(68%). Fathers were plaintiffs in only 6 cases (12%) and obtained sole custody in 2 of them, with one additional split award. Where custody was contested for children under twelve, judges routinely opened their considerations from Article 105 letter (a) of the KHI before examining whether any circumstance justified departing from it.

Departures from the presumption followed three identifiable routes. The first is the disqualification route grounded in Article 156 KHI: in Decision No. 1063/Pdt.G/2026/PA.Gs (Religious Court of Gresik), the court held that the norm of Article 105 may be set aside where the mother cannot guarantee the child's spiritual safety, finding that the mother's proven misconduct, an affair and an unregistered marriage, made the father's custody consistent with the child's best interests, interpreted through the lens of morality and spiritual protection rather than age alone.<sup>12</sup> The second is the stability route: in Decision No. 1652/Pdt.G/2025/PA.Amb (Religious Court of Ambarawa), the court relied on the Supreme Court's chamber guidance (SEMA No. 1 of 2017) to award custody to the father because the child had long lived with and adapted to him, reasoning that forced relocation to the mother would itself produce psychological harm.<sup>13</sup> The third is the consensual route: in six cases, including Decisions No. 218/Pdt.G/2026/PA.CN (Cirebon), No. 641/Pdt.G/2026/PA.Klt (Klaten), No. 1125/Pdt.G/2026/PA.NGJ (Nganjuk), and No. 535/Pdt.G/2026/PA.Pdlg (Pandeglang), custody followed a mediated agreement that the court ratified as binding under the principle of *pacta sunt servanda*.<sup>14</sup> Split awards tracked the *mumayyiz* distinction: in Decisions No. 1315/Pdt.G/2026/PA.NGJ (Nganjuk) and No. 289/Pdt.G/2026/PA.Skh (Sukoharjo), children over twelve who chose the father were placed with him while their younger siblings were placed with the mother.<sup>15</sup>

Two further patterns qualify the picture of maternal dominance. First, courts generally preserved the non-custodial parent's relationship with the child: visitation or access rights were expressly granted in 36 cases (72%), usually formulated as the custodial parent's obligation to give the other parent opportunity to meet the child and express affection. Second, the economic dimension of custody was far less consistently addressed: a concrete child-maintenance amount was fixed in only 13 cases (26%), typically around Rp1,000,000 to Rp1,500,000 per month with an annual increment, even though maintenance was demanded in the original claims far more often. The accompanying issues alleged in the pleadings reveal the factual texture within which these outcomes were produced: infidelity appeared in 18 cases, neglect in its various forms (including economic neglect) in 29, domestic violence in 14, and substance abuse or online gambling in 8. These allegations, proven through witnesses

<sup>12</sup>Decision of the Religious Court of Gresik Number 1063/Pdt.G/2026/PA.Gs.

<sup>13</sup>Decision of the Religious Court of Ambarawa Number 1652/Pdt.G/2025/PA.Amb; Supreme Court of the Republic of Indonesia, Circular Letter Number 1 of 2017 concerning the Enforcement of the Formulation of the Results of the 2017 Plenary Meeting of the Supreme Court Chambers as Guidelines for the Implementation of Duties for the Courts.

<sup>14</sup>Decision of the Religious Court of Cirebon Number 218/Pdt.G/2026/PA.CN; Decision of the Religious Court of Klaten Number 641/Pdt.G/2026/PA.Klt; Decision of the Religious Court of Nganjuk Number 1125/Pdt.G/2026/PA.NGJ; Decision of the Religious Court of Pandeglang Number 535/Pdt.G/2026/PA.Pdlg.

<sup>15</sup>Decision of the Religious Court of Nganjuk Number 1315/Pdt.G/2026/PA.NGJ; Decision of the Religious Court of Sukoharjo Number 289/Pdt.G/2026/PA.Skh.

and documents, functioned as the de facto evidence of parental fitness in the absence of psychological assessment, a point developed below.

*Table 1.* Distribution of Key Coded Variables across the Fifty Decisions

| Variable                                              | Category                                         | n (%)    |
|-------------------------------------------------------|--------------------------------------------------|----------|
| Custody award                                         | Mother                                           | 29 (58%) |
|                                                       | Father                                           | 5 (10%)  |
|                                                       | Divided between parents                          | 4 (8%)   |
|                                                       | Not decided on the merits                        | 12 (24%) |
| Plaintiff                                             | Mother                                           | 41 (82%) |
|                                                       | Father                                           | 6 (12%)  |
|                                                       | Not stated                                       | 3 (6%)   |
| Psychological evidence                                | Absent                                           | 43 (86%) |
|                                                       | Present (concerning the child or parenting)      | 5 (10%)  |
|                                                       | Present (concerning a parent only)               | 1 (2%)   |
|                                                       | Unclear                                          | 1 (2%)   |
| Explicit judicial reference to psychological evidence | None                                             | 44 (88%) |
|                                                       | Present (including one reference to theory only) | 5 (10%)  |
|                                                       | Unclear                                          | 1 (2%)   |
| Explicit weighting of psychological evidence          | None                                             | 46 (92%) |
|                                                       | Considered (main or supporting)                  | 3 (6%)   |
|                                                       | Explicitly set aside                             | 1 (2%)   |
| Visitation/access expressly granted                   | Yes                                              | 36 (72%) |
| Child maintenance amount fixed                        | Yes                                              | 13 (26%) |

**Source:** coded data from the Supreme Court Decision Directory, processed by the author (2026).

### The Near-Total Absence of Forensic Psychological Evidence

The most significant finding of this study is quantitative confirmation of what earlier case studies could only illustrate: forensic psychological evidence is almost entirely absent from *ḥaḍānah* adjudication. In 43 of the fifty decisions (86%), no psychological evidence of any kind was submitted. Only five decisions (10%)

contained psychological evidence bearing on the child or the parenting environment, and in one further case (2%) the evidence concerned only a parent's own condition. Correspondingly, 44 decisions (88%) contained no explicit reference to psychological evidence in the legal considerations, and 46 decisions (92%) contained no explicit assessment of its evidentiary weight. The coded reasons for absence are telling: in the overwhelming majority of cases the evidence was simply never requested by any party or by the court, and in one case a mother's trauma and psychological therapy were narrated in the statement of claim but never tendered as documentary or expert evidence at trial.

This finding reframes the problem identified in the prior literature. Studies by Zulfah and colleagues and by Lily and colleagues portray judges who receive psychological assessments and then disregard them, suggesting a problem of judicial reception.<sup>16</sup> The present data indicate that judicial reception is the second-order problem; the first-order problem is production. Under Indonesian civil procedure, judges in civil matters are largely passive with respect to evidence: parties bear the burden of tendering documents, witnesses, and experts.<sup>17</sup> Where neither party retains a psychologist, whether because of cost, unavailability of qualified forensic evaluators outside major cities, or simple unawareness that such evaluations exist, the court decides the child's future on conventional evidence alone. In practice, judges reconstructed parental fitness from witness testimony about infidelity, neglect, violence, or gambling, and from documents such as police reports; the child's own psychological condition, attachment, and developmental needs were inferred rather than assessed. The "best interests of the child" thus operated in most decisions as a legal formula attached to Article 105 KHI or to the Child Protection Law, not as a finding grounded in empirical examination of the individual child.

What fills the evidentiary vacuum deserves attention in its own right. In the forty-three cases without psychological evidence, judgments about caregiving quality were constructed from the accompanying issues proven through lay testimony: a father's online gambling and failure to provide maintenance grounded findings that he could not offer a stable environment; proven infidelity or an unregistered second marriage grounded findings that a parent could not guarantee the child's spiritual safety; documented violence grounded protective reasoning. These inferences are not irrational, since economic neglect, addiction, and violence are legitimate indicators of caregiving risk, but they are categorically different from what a forensic evaluation provides. Witness testimony establishes past parental conduct; it does not assess the child's attachment, developmental needs, trauma symptoms, or the comparative fit between each parent's capacities and this particular child. The result is an adjudicative style in which parental fault substitutes for child assessment: the question the courts in this corpus were equipped to answer was which parent has misbehaved, while the question the best-interests standard actually poses, which arrangement will this child develop best under, remained empirically unexamined in forty-nine of fifty cases.

<sup>16</sup>Zulfah, Sembiring, and Rosmalinda, "The Role of Child Psychological Test Results," 15–18; Lily, Waspada, and Juliati, "Tinjauan Yuridis," 44–47.

<sup>17</sup>HIR, Article 163, placing the burden of proof on the party asserting a right.

### Judicial Treatment of Psychological Evidence: Five Decisions

The five decisions in which psychological evidence appeared repay close analysis, because they display the full range of judicial responses, namely instrumental use, confirmatory use, procedural neglect, and reasoned rejection, while sharing one feature: none involved a custody evaluation meeting forensic standard. In Decision No. 291/Pdt.G/2025/PA.Btl (Religious Court of Bantul), the plaintiff mother submitted a psychologist's certificate and examination results showing that she was clinically experiencing post-traumatic stress disorder.<sup>18</sup> The panel referred to the evidence explicitly and gave it decisive weight, but solely to establish that the husband had committed psychological domestic violence, so that the divorce claim was not premature. The evidence played no role in the custody analysis; custody followed to the mother on other grounds. Psychological expertise here functioned as proof of a ground for divorce, not as an assessment of parenting fitness. A structurally similar instrumental use appears in Decision No. 401/Pdt.G/2026/PA.Bn (Religious Court of Bengkulu), where the father's psychological examination report served to document his own trauma, while custody of the child was awarded to the mother without psychological assessment of the child.<sup>19</sup>

Decision No. 4066/Pdt.G/2025/PA.Cbn (Religious Court of Cibinong) illustrates confirmatory use.<sup>20</sup> The mother submitted psychological examination results, and the panel cited them expressly as proving that the children, being under her care, were in a good environment supporting the fulfillment of their rights and optimal development. The evidence was weighed as supporting material that complemented proven paternal neglect, and the outcome fully aligned with it. Yet even here the record discloses no multimethod evaluation of both parents' capacities; the report corroborated a conclusion the conventional evidence already supported. In Decision No. 925/Pdt.G/2026/PA.Btg (Religious Court of Batang), by contrast, a psychological evaluation report was submitted but never considered at all, because the case was not examined on the merits after the plaintiff's non-appearance.<sup>21</sup> It is a reminder that procedural fate can nullify even properly tendered expert material.

The most analytically revealing case is Decision No. 160/Pdt.G/2026/PA.Pal (Religious Court of Palu), the only decision in the corpus in which a psychologist appeared in person.<sup>22</sup> The expert, from a regional women's and children's protection unit, testified that the six-year-old child felt comfortable and happy living with the father. The panel heard and recorded the testimony, then explicitly set it aside: invoking developmental research on children's suggestibility associated with Ceci and Bruck,<sup>23</sup> the judges reasoned that a six-year-old is labile, lacks settled preferences, and is easily influenced, and further characterized the father's covert removal of the

<sup>18</sup>Decision of the Religious Court of Bantul Number 291/Pdt.G/2025/PA.Btl.

<sup>19</sup>Decision of the Religious Court of Bengkulu Number 401/Pdt.G/2026/PA.Bn.

<sup>20</sup>Decision of the Religious Court of Cibinong Number 4066/Pdt.G/2025/PA.Cbn.

<sup>21</sup>Decision of the Religious Court of Batang Number 925/Pdt.G/2026/PA.Btg.

<sup>22</sup>Decision of the Religious Court of Palu Number 160/Pdt.G/2026/PA.Pal.

<sup>23</sup>Stephen J. Ceci and Maggie Bruck, "Suggestibility of the Child Witness: A Historical Review and Synthesis," *Psychological Bulletin* 113, no. 3 (1993): 403–439.

child as an unethical stratagem that tainted the child's expressed preference. Custody went to the mother, contrary to the expert's account. The decision cuts both ways for the argument of this article. On one hand, it demonstrates genuine judicial forensic literacy: the panel engaged psychological science on its own terms and identified a real methodological weakness, since the evaluation rested on a single interview session without standardized instruments or any assessment of both parents' caregiving capacities. On the other hand, it shows that when the only psychological input reaching the court is methodologically thin, sophisticated judges are given good reasons to discount psychology altogether, an outcome that penalizes the discipline for the inadequacy of its courtroom representation.

**Table 2.** Decisions Containing Psychological Evidence and Their Judicial Treatment

| Decision                                   | Evidence and submitting party                                     | Judicial treatment                                                                             | Custody outcome |
|--------------------------------------------|-------------------------------------------------------------------|------------------------------------------------------------------------------------------------|-----------------|
| 291/Pdt.G/2025/PA.Btl<br>(Bantul, 2025)    | Psychologist's certificate and examination results (PTSD); mother | Decisive for proving psychological domestic violence as a divorce ground; not used for custody | Mother          |
| 4066/Pdt.G/2025/PA.Cbn<br>(Cibinong, 2025) | Psychological examination results; mother                         | Cited as supporting proof of a good caregiving environment                                     | Mother          |
| 160/Pdt.G/2026/PA.Pal<br>(Palu, 2026)      | Evaluation report; expert testified in person; father (defendant) | Explicitly set aside on suggestibility grounds; single-session method criticized               | Mother          |
| 401/Pdt.G/2026/PA.Bn<br>(Bengkulu, 2026)   | Psychological examination report on the father; father            | Used to document the father's trauma; no bearing on custody                                    | Mother          |
| 925/Pdt.G/2026/PA.Btg<br>(Batang, 2026)    | Psychological evaluation report; mother                           | Never considered; case not examined on the merits                                              | Not decided     |

**Source:** coded data from the Supreme Court Decision Directory, processed by the author (2026).

### Judicial Reasoning between Article 105 KHI and the Best Interests of the Child

Analysis of the *ratio decidendi* shows that Indonesian Religious Court judges do not, as is sometimes assumed, apply classical *fiqh* mechanically. In 30 of the fifty decisions (60%), the panel combined the religious presumption of the KHI with an express invocation of the best interests of the child, and in a further 4 decisions (8%) the best-interests principle was combined with positive law such as Article 41 of the Marriage Law, the Child Protection Law, or ratified mediation agreements. Only 3 decisions (6%) rested on the religious presumption alone, while 8 (16%) were

resolved on procedural or contractual grounds and 5 (10%) did not state their principal basis. Notably, no decision invoked the best interests of the child as a free-standing test independent of the KHI or positive law: the principle consistently entered judicial reasoning as an interpretive companion to a textual norm, coloring the application of Article 105 rather than replacing it.

The substantive interpretations judges gave to the best-interests principal cluster into three types. The first equates the child's best interests with maternal care itself for children under twelve, effectively collapsing the principle into the Article 105 presumption. The second, visible in the stability cases such as Ambarawa and the split-custody decisions of Pekanbaru (No. 1937/Pdt.G/2025/PA.Pbr) and Tanjungpinang (No. 484/Pdt.G/2025/PA.TPI), reads best interests as continuity of environment, schooling, and established caregiving, even at the cost of the maternal presumption.<sup>24</sup> The third, exemplified by Gresik, reads best interests through moral and spiritual safety under Article 156 KHI. What unites all three is their epistemic basis: each rests on legal presumption and lay inference from witness testimony. Judges reasoned *about* psychological constructs such as attachment, adaptation, trauma from relocation, and suggestibility, and in Palu even cited psychological literature as an analytical instrument, but in forty-nine of fifty cases they did so without any psychological examination of the child before them. The tension documented doctrinally by Kadarisman and colleagues between *fiqh* presumptions and child-centered standards is therefore resolved in practice not by choosing one over the other, but by judges performing amateur psychology within a juridical idiom.<sup>25</sup>

### **Bridging the Gap: Toward Standardized Forensic Evaluation in Religious Courts**

The findings sharpen the comparison with the forensic model that governs custody evaluation internationally. Under professional guidelines, a custody evaluation is a child-centered forensic investigation that identifies the psychological needs of the child, the parenting attributes of each caregiver, and the resulting fit between them, using clinical interviews with both parents, age-appropriate interviews with the child, behavioral observation of parent-child interaction, judicious psychological testing, and collateral information from schools, medical records, and third parties.<sup>26</sup> The question is never which parent is abstractly superior, but which caregiving arrangement best serves the specific child and preserves the child's relationship with both parents.<sup>27</sup> Testing must be interpreted cautiously, since many

<sup>24</sup>Decision of the Religious Court of Pekanbaru Number 1937/Pdt.G/2025/PA.Pbr; Decision of the Religious Court of Tanjungpinang Number 484/Pdt.G/2025/PA.TPI.

<sup>25</sup>Kadarisman, Fedro, and Arifin, "Best Interest of the Child in Islamic Family Law," 163–170.

<sup>26</sup>American Psychological Association, "Guidelines for Child Custody Evaluations," 864–866; D. S. Chung et al., "Custody Evaluation Process and Report Writing," *Journal of the Korean Academy of Child and Adolescent Psychiatry* 31, no. 2 (2020): 59–63; R. A. Simon and A. Shienvold, "Parenting Plan Evaluations as Forensic Investigations of Children's Needs, Parenting Capacities, and Fit," *Family Court Review* 61, no. 4 (2023).

<sup>27</sup>S. Brandt, "The Myth of Gender Neutrality in Family Court: A Clinician's Perspective on Determinations of 'the Best Interest of the Child,'" *International Journal of Applied Psychoanalytic Studies* 20, no. 3 (2023): 410–418; C. Cyr et al., "An Attachment-Based Parental Capacity Assessment to Orient Decision-Making in Child Protection Cases: A Randomized Control Trial," *Child Maltreatment* 27, no. 1 (2022): 70–74; L. S. Davis and P. M. Stahl, "Identifying and Managing Evaluator Biases in Parenting Plan Evaluations," *Family Court Review* 61, no. 4 (2023):

instruments were not designed for custody purposes,<sup>28</sup> and evaluators owe their duty to the court and the child's best interests rather than to the retaining party, remaining alert to their own biases.<sup>29</sup> Measured against this model, none of the five instances of psychological evidence in the corpus qualifies: three concerned a parent's or the mother's clinical condition for divorce purposes, one was a single-session child interview without standardized instruments or dual-parent assessment, and one was never examined. Indonesian Religious Courts are thus not rejecting forensic custody evaluation; they have, on this evidence, never actually received one.

The forensic model matters most precisely in the case types this corpus shows to be common. Fourteen decisions involved domestic violence allegations, which under Law No. 23 of 2004 on the Elimination of Domestic Violence includes psychological violence, the very ground the Bantul panel accepted on psychological evidence.<sup>30</sup> In such cases, evaluators must assess power dynamics, the impact of trauma on the child, and the perpetrator's capacity to provide safety, and must avoid misreading an unsubstantiated protection report as proof that no abuse occurred.<sup>31</sup> Where a child resists contact with a parent, the configuration observed in Palu, evaluators must distinguish justified estrangement rooted in real trauma from alienating behavior by the other parent, a distinction that remains contested in the literature and therefore demands operational definitions and rigorous method rather than assumption.<sup>32</sup> Recognizing indicators of trauma exposure such as hypervigilance, avoidance, and excessive compliance would allow courts to order protective interim arrangements while proceedings continue.<sup>33</sup> Protracted custody litigation is itself psychologically damaging: children exposed to residential disruption and parental conflict show internalizing problems such as self-blame and sadness and externalizing problems such as anger,<sup>34</sup> which argues for expedited handling of high-conflict cases and for pairing adjudication with therapeutic referral,

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765–772; K. Jezierski and M. Kujawa, "Keeping Both Parents' Bond with Their Child in Separation Situation," *Educational Psychology* 62, no. 20 (2021): 62–68; A. I. Sani, "Psychological Expertise in Cases of Interparental Conflict: Recommendations for Practice," *Temas em Psicologia* 25, no. 2 (2017): 440–443.

<sup>28</sup>R. K. Otto, J. F. Edens, and E. H. Barcus, "The Use of Psychological Testing in Child Custody Evaluations," *Family Court Review* 38, no. 3 (2000): 320–330; F. Fariña et al., "A Meta-Analytic Review of the MMPI Validity Scales and Indexes to Detect Defensiveness in Custody Evaluations," *International Journal of Clinical and Health Psychology* 17, no. 2 (2017): 133–136; L. Redondo et al., "A Meta-Analytical Review of the Responses in the MMPI-2/MMPI-2-RF Clinical and Restructured Scales of Parents in Child Custody Dispute," *Anales de Psicología* 35, no. 1 (2018): 160–163.

<sup>29</sup>American Psychological Association, "Guidelines for Child Custody Evaluations," 864; J. Zumbach and R. Volbert, "Forensic Psychological Evaluations in Child Custody and Child Protection Cases," *European Psychologist* 26, no. 3 (2021).

<sup>30</sup>Law of the Republic of Indonesia Number 23 of 2004 concerning the Elimination of Domestic Violence, Articles 5 and 7.

<sup>31</sup>Chung et al., "Custody Evaluation Process," 61–63; D. S. Moon et al., "Custody Evaluation in High-Conflict Situations Focused on Domestic Violence and Parental Alienation Syndrome," *Journal of the Korean Academy of Child and Adolescent Psychiatry* 31, no. 2 (2020): 68–71.

<sup>32</sup>E. Kruk and J. J. Harman, "Countering Arguments against Parental Alienation as a Form of Family Violence and Child Abuse," *The American Journal of Family Therapy* 53, no. 2 (2025): 125–134; Moon et al., "Custody Evaluation in High-Conflict Situations," 68–71.

<sup>33</sup>Moon et al., "Custody Evaluation in High-Conflict Situations," 69–71.

<sup>34</sup>P. P. Nambiar, K. V. Jangam, and S. P. Seshadri, "Psychosocial Perspectives on Child Mental Health in Custody Disputes: A Qualitative Study from India," *Indian Journal of Psychological Medicine* 47, no. 4 (2025): 374–378.

functions the mediation-based decisions in this corpus partially and informally performed.

Adopting the forensic model in Religious Court practice also requires an ethical infrastructure adapted to the Indonesian context. Unlike a treating therapist, a custody evaluator's primary duty runs to the court and to the overarching best-interests principle, not to the retaining party, and this role distinction must be communicated clearly to parents at the outset to secure informed consent and to define the limits of confidentiality.<sup>35</sup> In Indonesia, the professional foundation for these duties already exists in the Indonesian Psychological Code of Ethics, which regulates competence, informed consent, and the provision of expert statements in legal proceedings;<sup>36</sup> what is missing is a custody-specific elaboration of those general norms and a shared understanding with the courts about the evaluator's position. The evaluator's protective function should accordingly be understood not as advocacy for either parent, nor even as formal advocacy for the child as a litigant, but as the provision of objective, scientifically grounded data that protect the child's interests precisely through the evaluator's neutrality, including alertness to the evaluator's own cultural and gender biases.<sup>37</sup> Evaluators should further consider whether, in protracted high-conflict disputes, a diagnostic evaluation is the right instrument at all, or whether recommending mediation and therapeutic intervention would better reduce parental conflict and protect the child's mental health,<sup>38</sup> a consideration this corpus indirectly validates, since the six mediation-based custody outcomes were reached without adversarial fact-finding about parental fault.

Finally, the recommendations that flow from these findings must be sorted by institutional feasibility. Within the existing procedural framework, Religious Court panels can already act: they can prioritize and expedite high-conflict custody cases to shorten the period of uncertainty that the psychosocial literature identifies as harmful to children;<sup>39</sup> they can order protective interim arrangements, including supervised visitation, when trauma indicators appear; they can use their existing power to hear experts to request psychological evaluation in contested cases; and they can leverage the court-annexed mediation that Indonesian procedure already mandates, which this corpus shows can produce custody arrangements both parents accept.<sup>40</sup> Other measures are policy development rather than adjudication: a standardized national protocol for custody evaluation, systematic parenting-coordination or post-decree support programs for high-conflict families, and parent education about the developmental effects of continued conflict all require regulatory action and institutional investment by the Supreme Court, the Ministry of Religious Affairs, and the psychological profession, and should be advocated as such rather than expected of individual panels.

<sup>35</sup>American Psychological Association, "Guidelines for Child Custody Evaluations," 865; Zumbach and Volbert, "Forensic Psychological Evaluations."

<sup>36</sup>Himpunan Psikologi Indonesia, *Kode Etik Psikologi Indonesia* (Jakarta: Pengurus Pusat HIMPSI, 2010), Articles 2, 12, and 65.

<sup>37</sup>Davis and Stahl, "Identifying and Managing Evaluator Biases," 765–772.

<sup>38</sup>Zumbach and Volbert, "Forensic Psychological Evaluations."

<sup>39</sup>Nambiar, Jangam, and Seshadri, "Psychosocial Perspectives on Child Mental Health," 374–378.

<sup>40</sup>Supreme Court Regulation Number 1 of 2016 concerning Mediation Procedures in Court.

Three systemic obstacles explain the production gap, and each finding of this study gives them concrete shape. The first is the absence of standardized guidance: no regulation or Supreme Court instrument currently tells Religious Court judges when a psychological evaluation should be ordered in a *ḥaḍānah* case, what such an evaluation must contain, or how expert reports relate to the statutory evidence categories, so whether psychology enters the courtroom depends entirely on party initiative, which the data show is exercised in one case out of ten. The second is uneven judicial forensic literacy: the Palu panel could deploy suggestibility research, while most decisions do not engage psychological reasoning at all, and without shared training judges have no criteria for distinguishing an adequate evaluation from a single-interview certificate. The third is access: qualified forensic evaluators are concentrated in large cities, while this corpus originates predominantly from district-level courts where the affordable psychological services are clinical units and regional protection agencies whose reports, as the Palu case shows, may not withstand forensic scrutiny. It must be emphasized that these three obstacles are conceptual findings derived from the decision texts and the literature, not from direct observation of court practice; interview-based research with judges and psychologists is needed to test them.

## Conclusion

This study set out to determine how Indonesian Religious Courts position forensic psychological evidence in *ḥaḍānah* disputes. The content analysis of fifty decisions yields three findings. First, custody outcomes remain anchored in the maternal presumption of Article 105 KHI, with mothers receiving custody in 58% of cases, but judges depart from it through three doctrinally coherent routes: maternal disqualification under Article 156 KHI, environmental stability supported by SEMA No. 1 of 2017, and ratified mediation agreements. Second, the best interests of the child are invoked in most decisions (68% in combination with religious or positive law) yet is determined almost entirely without psychological assessment: 86% of cases contained no psychological evidence, and 92% of decisions weighed none. Third, when psychological material does appear, it serves to prove divorce grounds or a parent's condition rather than parenting fitness, and the single in-person expert testimony in the corpus was set aside for methodological weakness. The theoretical implication is that the problem previously framed as judicial disregard of psychological evidence is better understood as a failure of production: the epistemological divide between Islamic family law and psychological science persists in Indonesia chiefly because forensically adequate evaluations never reach the bench.

The practical implications follow directly. The Supreme Court and the Directorate General of the Religious Courts Body should issue guidance, whether through a regulation or chamber circular, specifying when panels in *ḥaḍānah* cases should order or request a psychological evaluation and how such reports are to be treated within the law of evidence. Judicial training bodies should incorporate forensic-psychological literacy into the continuing education of Religious Court judges, so that engagement of the kind displayed in the Palu decision becomes systematic rather than exceptional. The Indonesian psychological profession, through its association and its forensic psychology community, should develop a standardized, culturally and legally contextualized protocol for custody evaluation in Religious Court proceedings, and should extend evaluator availability beyond

major cities, including through regional protection units whose methods are upgraded to forensic standards. Future research should combine decision analysis with interviews of judges and evaluators, and should test whether court-ordered evaluations change custody reasoning where they are introduced.

### AI Tool Use Declaration

During the preparation of this manuscript, the author used an AI language assistant to support literature organization, structural editing, and language refinement. All AI-assisted output was subsequently verified, critically reviewed, and substantially edited by the author. The coding of court decisions, the analysis, and the interpretation of findings are the author's own. The author bears sole responsibility for the final content of this manuscript.

### Bibliography

- American Psychological Association. "Guidelines for Child Custody Evaluations in Family Law Proceedings." *American Psychologist* 65, no. 9 (2010): 863–867. <https://doi.org/10.1037/a0021250>.
- Arbillah, A., Z. Makkawaru, and K. Kamsilaniah. "Analisis Hukum Pelaksanaan Hak Asuh Anak setelah Putusan Pengadilan Agama Kelas IA Makassar." *Indonesian Journal of Legality of Law* 5, no. 2 (2023): 206–211. <https://doi.org/10.35965/ijlf.v5i2.2608>.
- Bow, J. N., and F. A. Quinnell. "A Critical Review of Child Custody Evaluation Reports." *Family Court Review* 40, no. 2 (2002): 164–176. <https://doi.org/10.1111/j.174-1617.2002.tb00827.x>.
- Brandt, S. "The Myth of Gender Neutrality in Family Court: A Clinician's Perspective on Determinations of 'the Best Interest of the Child.'" *International Journal of Applied Psychoanalytic Studies* 20, no. 3 (2023): 403–434. <https://doi.org/10.1002/aps.1838>.
- Ceci, Stephen J., and Maggie Bruck. "Suggestibility of the Child Witness: A Historical Review and Synthesis." *Psychological Bulletin* 113, no. 3 (1993): 403–439. <https://doi.org/10.1037/0033-2909.113.3.403>.
- Chung, D. S., D. S. Moon, M. H. Lee, and Y. S. Kwack. "Custody Evaluation Process and Report Writing." *Journal of the Korean Academy of Child and Adolescent Psychiatry* 31, no. 2 (2020): 58–65. <https://doi.org/10.5765/jkacap.200006>.
- Cyr, C., K. Dubois-Comtois, D. Paquette, L. Lopez, and M. Bigras. "An Attachment-Based Parental Capacity Assessment to Orient Decision-Making in Child Protection Cases: A Randomized Control Trial." *Child Maltreatment* 27, no. 1 (2022): 66–77. <https://doi.org/10.1177/1077559520967995>.
- Davis, L. S., and P. M. Stahl. "Identifying and Managing Evaluator Biases in Parenting Plan Evaluations." *Family Court Review* 61, no. 4 (2023): 762–781. <https://doi.org/10.1111/fcre.12743>.
- de Ruiter, C., and N. Kaser-Boyd. *Forensic Psychological Assessment in Practice*. New York: Routledge, 2015.

- Eka, and L. Diah Sugiarti. "Pemberian Hak Asuh Anak kepada Ayah Pasca Perceraian dalam Putusan Pengadilan Agama Kuningan No. 2037/Pdt.G/2028/PA.Kng." *Al Mashalih: Journal of Islamic Law* 5, no. 1 (2024): 17–34. <https://doi.org/10.59270/mashalih.v5i01.239>.
- Fariña, F., L. Redondo, D. Seijo, M. Novo, and R. Arce. "A Meta-Analytic Review of the MMPI Validity Scales and Indexes to Detect Defensiveness in Custody Evaluations." *International Journal of Clinical and Health Psychology* 17, no. 2 (2017): 128–138. <https://doi.org/10.1016/j.ijchp.2017.02.002>.
- Himpunan Psikologi Indonesia. *Kode Etik Psikologi Indonesia*. Jakarta: Pengurus Pusat HIMPSI, 2010.
- Jezierski, K., and M. Kujawa. "Keeping Both Parents' Bond with Their Child in Separation Situation: Considerations in the Context of Forensic-Psychological Diagnosis." *Educational Psychology* 62, no. 20 (2021): 57–74. <https://doi.org/10.5604/01.3001.0015.3822>.
- Kadarisman, A., A. Fedro, and Z. Arifin. "Best Interest of the Child in Islamic Family Law: Integrating Maqāṣid al-Sharī'ah and Double Movement Theory in Ḥaḍānah Cases." *Jurnal Al-Dustur* 8, no. 2 (2025): 155–174. <https://doi.org/10.30863/aldustur.v8i2.10459>.
- Kruk, E., and J. J. Harman. "Countering Arguments against Parental Alienation as a Form of Family Violence and Child Abuse." *The American Journal of Family Therapy* 53, no. 2 (2025): 117–146. <https://doi.org/10.1080/01926187.2024.2396279>.
- Lily, A., W. Waspada, and J. Juliati. "Tinjauan Yuridis terhadap Hak Asuh Anak Berdasarkan Putusan No. 359/Pdt.G/2022/PA.Mks." *Clavia* 22, no. 1 (2024): 39–50. <https://doi.org/10.56326/clavia.v22i1.4097>.
- Moon, D. S., M. H. Lee, D. S. Chung, and Y. S. Kwack. "Custody Evaluation in High-Conflict Situations Focused on Domestic Violence and Parental Alienation Syndrome." *Journal of the Korean Academy of Child and Adolescent Psychiatry* 31, no. 2 (2020): 66–73. <https://doi.org/10.5765/jkacap.200004>.
- Nambiar, P. P., K. V. Jangam, and S. P. Seshadri. "Psychosocial Perspectives on Child Mental Health in Custody Disputes: A Qualitative Study from India." *Indian Journal of Psychological Medicine* 47, no. 4 (2025): 371–380. <https://doi.org/10.1177/02537176241254515>.
- Otto, R. K., J. F. Edens, and E. H. Barcus. "The Use of Psychological Testing in Child Custody Evaluations." *Family Court Review* 38, no. 3 (2000): 312–340. <https://doi.org/10.1111/j.174-1617.2000.tb00578.x>.
- Quinnell, F. A., and J. N. Bow. "Psychological Tests Used in Child Custody Evaluations." *Behavioral Sciences & the Law* 19, no. 4 (2001): 491–501. <https://doi.org/10.1002/bsl.452>.
- Redondo, L., F. Fariña, D. Seijo, M. Novo, and R. Arce. "A Meta-Analytical Review of the Responses in the MMPI-2/MMPI-2-RF Clinical and Restructured Scales of Parents in Child Custody Dispute." *Anales de Psicología* 35, no. 1 (2018): 156–165. <https://doi.org/10.6018/analesps.35.1.338381>.

- Sani, A. I. "Psychological Expertise in Cases of Interparental Conflict: Recommendations for Practice." *Temas em Psicologia* 25, no. 2 (2017): 437–445. <https://doi.org/10.9788/TP2017.2-20En>.
- Simon, R. A., and A. Shienvold. "Parenting Plan Evaluations as Forensic Investigations of Children's Needs, Parenting Capacities, and Fit." *Family Court Review* 61, no. 4 (2023).
- Zermatten, Jean. "The Best Interests of the Child Principle: Literal Analysis and Function." *The International Journal of Children's Rights* 18, no. 4 (2010): 483–499. <https://doi.org/10.1163/157181810X537391>.
- Zulfah, Indana, Idha Aprilyana Sembiring, and Rosmalinda. "The Role of Child Psychological Test Results in Custody Decisions in Divorce Cases." *Walisongo Law Review* 7, no. 1 (2025): 12–20. <https://doi.org/10.21580/walrev.2025.7.1.25593>.
- Zumbach, J., and R. Volbert. "Forensic Psychological Evaluations in Child Custody and Child Protection Cases." *European Psychologist* 26, no. 3 (2021).

### **Legislation and Regulations**

- Het Herziene Indonesisch Reglement (HIR) / Reglemen Indonesia yang Diperbaharui.
- Presidential Instruction Number 1 of 1991 concerning the Compilation of Islamic Law.
- Supreme Court of the Republic of Indonesia. Circular Letter Number 1 of 2017 concerning the Enforcement of the Formulation of the Results of the 2017 Plenary Meeting of the Supreme Court Chambers as Guidelines for the Implementation of Duties for the Courts.
- Supreme Court Regulation Number 1 of 2016 concerning Mediation Procedures in Court.
- Law of the Republic of Indonesia Number 1 of 1974 concerning Marriage.
- Law of the Republic of Indonesia Number 7 of 1989 concerning Religious Courts, as amended by Law Number 3 of 2006 and Law Number 50 of 2009.
- Law of the Republic of Indonesia Number 23 of 2004 concerning the Elimination of Domestic Violence.
- Law of the Republic of Indonesia Number 35 of 2014 concerning the Amendment to Law Number 23 of 2002 concerning Child Protection.

### **Court Decisions**

- Decision of the Religious Court of Ambarawa Number 1652/Pdt.G/2025/PA.Amb.
- Decision of the Religious Court of Bantul Number 291/Pdt.G/2025/PA.Btl.
- Decision of the Religious Court of Batang Number 925/Pdt.G/2026/PA.Btg.
- Decision of the Religious Court of Bengkulu Number 401/Pdt.G/2026/PA.Bn.
- Decision of the Religious Court of Cibinong Number 4066/Pdt.G/2025/PA.Cbn.

Decision of the Religious Court of Cirebon Number 218/Pdt.G/2026/PA.CN.

Decision of the Religious Court of Gresik Number 1063/Pdt.G/2026/PA.Gs.

Decision of the Religious Court of Klaten Number 641/Pdt.G/2026/PA.Klt.

Decision of the Religious Court of Nganjuk Number 1125/Pdt.G/2026/PA.NGJ.

Decision of the Religious Court of Nganjuk Number 1315/Pdt.G/2026/PA.NGJ.

Decision of the Religious Court of Palu Number 160/Pdt.G/2026/PA.Pal.

Decision of the Religious Court of Pandeglang Number 535/Pdt.G/2026/PA.Pdlg.

Decision of the Religious Court of Pekanbaru Number 1937/Pdt.G/2025/PA.Pbr.

Decision of the Religious Court of Sukoharjo Number 289/Pdt.G/2026/PA.Skh.

Decision of the Religious Court of Tanjungpinang Number  
484/Pdt.G/2025/PA.TPI.

Direktori Putusan Mahkamah Agung Republik Indonesia.  
<https://putusan3.mahkamahagung.go.id/>.