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The Legal Nature of Mixed Marriage Divorce under Indonesian Law: Jurisdictional Authority of the Religious Court in Transnational Marital Disputes

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ABSTRACT

*This study examines the legal nature of mixed marriages and divorce within the Indonesian legal system, focusing on the authority of Religious Courts in adjudicating such cases. Using a normative juridical and qualitative approach, the research analyzes statutory provisions, doctrinal interpretations, and judicial practices through a case study of Decision Number 406/Pdt.G/2020/PA.Dps issued by the Denpasar Religious Court. The findings indicate that mixed marriage divorces involving Indonesian citizens and foreign nationals fall under the jurisdiction of Religious Courts when one spouse is an Indonesian Muslim. The court's decision aligns with Law Number 1 of 1974 on Marriage, Government Regulation Number 9 of 1975, Law Number 12 of 2006 on Citizenship, and the Compilation of Islamic Law (KHI). The study concludes that the Religious Court applies the principles of *lex loci celebrationis* and *lex fori* to ensure that Indonesian law governs the dissolution of mixed marriages. This legal approach ensures justice, legal certainty, and state protection for Indonesian citizens engaged in transnational marital relationships.*

Keywords: *Divorce, Indonesian Marriage Law, Mixed Marriage, Private International Law, Religious Court*

INTRODUCTION

Human beings are inherently social creatures whose existence depends upon living within organized communities. Among the most fundamental aspects of human social life is the biological and cultural imperative to form family units through marriage. Marriage, in this context, constitutes a legally recognized union between a man and a woman, intended to create a lasting bond.¹ As society becomes increasingly complex, the legal system must evolve to regulate the full range of social relations both within national boundaries and across them to ensure legal certainty for Indonesian citizens who enter marital unions with foreign nationals.

Marriage occupies a position of central importance in both individual and collective life. For that reason, the state bears responsibility for safeguarding the stability and legitimacy of marital relationships. In Indonesia, the principal legal framework governing marriage is Law No. 1 of 1974 on Marriage (hereafter referred to as the Marriage Law).² The contemporary era of globalization characterized by accelerated mobility and unprecedented information exchange has resulted in a marked increase in marriages between Indonesian citizens and foreign nationals. This development reflects not only the intensification of international communication but also broader sociocultural transformations accompanying global interaction.³

Article 57 of the Marriage Law defines a mixed marriage as a union between two individuals who, while residing in Indonesia, are subject to different legal systems owing to their distinct nationalities, provided that at least one party holds Indonesian citizenship. Several legal characteristics arise from this provision. First, the relationship involves one man and one woman, thereby affirming the principle of monogamy. Second, each spouse remains subject to a separate legal system within Indonesian jurisdiction. Third, the divergence of legal regimes is not rooted in differences of religion, ethnicity, or social group, but rather in nationality. Finally, the marriage must involve at least one Indonesian citizen.⁴

Mixed marriages between Indonesian and foreign citizens are an inevitable outcome of contemporary social dynamics, intensified by tourism and international mobility. These unions raise not only private law issues—such as marital property and dissolution—but also significant public law concerns, including questions of

¹ Subekti, *Pokok-Pokok Hukum Perdata*, 1983, accessed June 4, 2025, <https://inlislite.uin-suska.ac.id/opac/detail-opac?id=19148>.

² Republik Indonesia, *Law Number 1 of 1974*, 1974, accessed October 9, 2025, <https://peraturan.bpk.go.id/Details/47406/uu-no-1-tahun-1974>.

³ Laurensius Arliman S, “Peran Lembaga Catatan Sipil Terhadap Perkawinan Campuran Berdasarkan Undang-Undang Perkawinan,” *JCH (Jurnal Cendekia Hukum)* 4, no. 2 (March 28, 2019): 288, <http://e-jurnal.stih-pm.ac.id/index.php/cendekeahukum/article/view/40>.

⁴ Abdul Kadir Muhammad, *Hukum Perdata Indonesia, Pengantar Hukum Indonesia (PHI)* (Buku Ajar Hukum perdata Internasional, 2021), <https://repository.penerbitwidina.com/media/publications/558993-hukum-perdata-34d44ded.pdf>.

citizenship and state jurisdiction.⁵ They involve the intersection of two national legal systems, mixed marriages fall within the domain of private international law, which determines the applicable law governing cross-border personal relationships.⁶ Marriage, including mixed marriage, is regarded in Indonesia as a sacred institution inseparable from religious principles and moral foundations

The Indonesian state regulates marriage as both a personal and public institution. Law No. 1 of 1974 defines marriage as a physical and spiritual bond between a man and a woman as husband and wife, formed with the purpose of establishing a happy and enduring family grounded in faith in the One Almighty God.⁷ This law establishes the substantive and procedural requirements for marriage, ensuring conformity with religious doctrine and legal norms.⁸

In the digital age, technological connectivity has rendered national borders increasingly porous, enabling continuous interaction among individuals of different nationalities. Social media platforms have transformed global communication, frequently turning professional or casual relationships into personal or familial ones.⁹ Consequently, the incidence of mixed marriages involving Indonesian citizens has risen significantly, driven by enhanced cross-border communication.

As the frequency of mixed marriages continues to increase, the complexity of legal issues arising from such unions becomes more evident. These complexities are not limited to questions of marriage validity but extend to broader matters such as nationality, property rights, and jurisdiction in cases of divorce or inheritance. Consequently, a coherent and comprehensive legal framework is required to reconcile differences between domestic law and foreign legal systems. The role of Indonesian legal institutions—particularly the Religious Courts—thus becomes crucial in determining both the legitimacy of mixed marriages and the resolution of disputes that may arise from them.

Indonesian marriage and divorce are regulated through multiple statutory instruments, including Law No. 1 of 1974 on Marriage, Government Regulation No. 9 of 1975 on its Implementation, Ministerial Regulation of Religious Affairs No. 11 of 2007, Law No. 3 of 2006 on Population Administration, and the Compilation of Islamic Law (Presidential Instruction No. 1 of 1991). In addition, private international law provides the principles for resolving conflicts of laws in relationships involving individuals of different nationalities.

⁵ Ardianto Ucu, "Aplikasi Pendekatan Interdisipliner Dalam Studi Hukum Perkawinan: Studi Kasus Perkawinan Di Bawah Umur," *As-Syar'i: Jurnal Bimbingan & Konseling Keluarga* 6, no. 1 (October 15, 2023): 558–569, accessed May 16, 2025, <https://doi.org/10.47467/as.v6i1.4994>.

⁶ Sudargo Gautama, "Hukum Perdata Internasional Indonesia" (2008), <https://www.jdih.kemenkeu.go.id/dok/dbce7158-9ea3-462a-42b6-08db6e8b31bb>.

⁷ Indonesia, *Law Number 1 of 1974*.

⁸ Idah Faridah and Kunarso Kunarso, "The Judge Considerations In Making Decision Against Narcotics In Children," *Journal of Court and Justice* (December 1, 2022): 22–33, <https://journal.jfpublisher.com/index.php/jcj/article/view/208>.

⁹ Ibid.

Law No. 1 of 1974 stipulates that every marriage must be performed in accordance with the respective religion of the parties and registered under state law.¹⁰ In mixed marriages, the Marriage Law and the Citizenship Law regulate the conferral or loss of nationality following marriage. For example, if an Indonesian man marries a foreign woman, the wife may obtain Indonesian citizenship within one year of marriage, subject to specific statutory conditions (Article 58).

Mixed marriages may take place either within Indonesia or abroad. When conducted outside Indonesia, such marriages are valid if they comply with the laws of the host country and do not contravene Indonesian legal provisions (Article 56). When performed in Indonesia, they must adhere to the requirements set forth in the Marriage Law (Article 59). Each party must satisfy the material requirements prescribed by their respective national laws, and the authorized registrar or the court may issue certificates confirming compliance (Article 60).

Divorce may also occur in mixed marriages. A mixed divorce involves the dissolution of marriage between an Indonesian citizen and a foreign national. The legal basis for such cases includes Law No. 1 of 1974 on Marriage and Law No. 12 of 2006 on Citizenship. This study examines the legal nature of mixed marriage and the jurisdiction of Indonesian Religious Courts in adjudicating mixed divorce cases through an analysis of Decision No. 406/Pdt.G/2020/PA.Dps, decided by the Denpasar Religious Court in Bali Province.¹¹

The objectives of this study are twofold. First, it seeks to analyze the legal nature of mixed marriages and the dissolution of such marriages within the framework of Indonesian law. Second, it aims to examine the jurisdictional authority of the Religious Courts in adjudicating divorce cases that arise from mixed marriages between Indonesian citizens and foreign nationals.

RESEARCH METHODOLOGY

This study employs a normative juridical approach, focusing on the analysis of legal principles, doctrines, and statutory regulations governing mixed marriage divorce and the jurisdictional authority of Religious Courts in Indonesia. The research adopts a qualitative methodology, utilizing library research techniques through the systematic collection and examination of legal materials to develop a comprehensive understanding of the subject matter.¹²

The data sources used in this study consist of three categories: primary, secondary, and tertiary legal materials. The primary legal materials include: the 1945 Constitution of the Republic of Indonesia; the Indonesian Civil Code (Kitab

¹⁰ Indonesia, *Law Number 1 of 1974*.

¹¹ Pengadilan Agama Denpasar, *Putusan Nomor 313/Pdt.G/2021/PA.Dps [Perceraian Antara WNI Dan WNA]*, 2021, <https://putusan3.mahkamahagung.go.id/>.

¹² M. Bachrul Ulum Udin and Wreda Danang Widoyoko, "The Law Enforcement of Narcotics Crime," *Journal of Court and Justice* (December 1, 2022): 11–21, <https://journal.jfpublisher.com/index.php/jcj/article/view/207>.

Undang-Undang Hukum Perdata); Law Number 1 of 1974 concerning Marriage¹³; Law Number 7 of 1989 concerning Religious Courts, as amended by Law Number 3 of 2006; Law Number 12 of 2006 concerning Citizenship; Government Regulation Number 9 of 1975 concerning the Implementation of Law Number 1 of 1974 on Marriage; Ministerial Regulations of Religious Affairs Numbers 3 of 1975 and 11 of 2007; Presidential Regulation Number 1 of 1991 concerning the Compilation of Islamic Law; and Decision Number 406/Pdt.G/2020/PA.Dps issued by the Denpasar Religious Court.¹⁴ The secondary legal materials comprise scholarly books, peer-reviewed journal articles, legal commentaries, and research publications related to mixed marriage, divorce proceedings, and the authority of Religious Courts.¹⁵ Meanwhile, the tertiary legal materials include legal dictionaries, encyclopedias, and reputable online legal databases used to support conceptual clarification.

Data collection was conducted through comprehensive library research, involving a detailed review of statutory provisions, judicial precedents, and scholarly literature concerning mixed marriage divorce and Religious Court jurisdiction. Documentary analysis techniques were applied to extract, categorize, and synthesize relevant legal information from these materials, ensuring systematic and coherent data organization.

The data analysis employed a qualitative descriptive method, incorporating several analytical techniques. First, statutory interpretation was used to systematically examine legal provisions regulating mixed marriages and divorce. Second, case study analysis focused on Decision Number 406/Pdt.G/2020/PA.Dps to demonstrate the practical application of relevant legal principles. Third, doctrinal analysis was undertaken to critically evaluate legal doctrines and scholarly interpretations regarding the jurisdiction of Religious Courts. Finally, comparative legal analysis was applied to assess the interaction between Indonesian national law and principles of international private law. The overall analytical framework relied on deductive reasoning, progressing from general legal principles to their specific

¹³ Indonesia, *Law Number 1 of 1974*.

¹⁴ Ibid.; Republik Indonesia, *Law Number 3 of 2006*, 2006, accessed October 9, 2025, <https://peraturan.bpk.go.id/Details/107708/perbup-kab-bone-bolango-no-3-tahun-2006>; Gita Reza Nadhani and Nurist Surayya Ulfa, "Hubungan Terpaan Informasi Produk Dan Terpaan Promosi Penjualan Dengan Keputusan Pembelian Kembali Fashion Di Tokopedia," *Sustainability (Switzerland)* 11, no. 1 (2019): 1–14, http://sciotea.caf.com/bitstream/handle/123456789/1091/RED2017-Eng-8ene.pdf?sequence=12&isAllowed=y%0Ahttp://dx.doi.org/10.1016/j.regsciurbeco.2008.06.005%0Ahttps://www.researchgate.net/publication/305320484_SISTEM_PEMBETUNGAN_TERPUSAT_STRATEGI_MELESTARI; Republik Indonesia, *Law Number 12 of 2006* (Jakarta, 2006), <https://peraturan.bpk.go.id/Details/47406/uu-no-12-tahun-2006>; Pengadilan Agama Denpasar, *Putusan Nomor 313/Pdt.G/2021/PA.Dps [Perceraian Antara WNI Dan WNA]*.

¹⁵ Muchimah Muchimah, "Pelaksanaan Peraturan Pemerintah No. 9 Tahun 1975 Dalam Perspektif Sosiologi Dan Antropologi Hukum Islam," *Volksgeist: Jurnal Ilmu Hukum dan Konstitusi* 1, no. 2 (December 31, 2018): 157–171, accessed October 10, 2025, <https://jurnal.hukumonline.com/a/5cb49be901fb73000e1c75b0/pelaksanaan-peraturan-pemerintah-no-9-tahun-1975-dalam-perspektif-sosiologi-dan-antropologi-hukum-islam/>.

application in mixed marriage divorce cases. This methodological structure allowed for a comprehensive understanding of the legal framework governing the authority of Religious Courts in adjudicating transnational marital disputes.¹⁶

To ensure validity and reliability, the study applied triangulation of multiple authoritative legal sources, including statutory laws, judicial decisions, and academic commentaries. Validity was reinforced by cross-verifying interpretations from these diverse materials, while reliability was maintained through systematic documentation, consistent application of legal analysis methods, and transparent presentation of reasoning processes. This methodological rigor ensures that the findings of this research are both credible and replicable within the domain of Indonesian legal scholarship.

In summary, this methodological design not only strengthens the legal reasoning employed throughout the study but also provides a structured analytical foundation for interpreting judicial decisions within a broader normative context. By integrating doctrinal, statutory, and case-based analyses, this research enables a holistic examination of how Religious Courts exercise their authority in mixed marriage divorce cases. Consequently, the methodological framework ensures that the subsequent discussion of the Denpasar Religious Court's decision is grounded in a sound legal logic, allowing the study to bridge theoretical understanding with judicial practice while contributing meaningfully to the development of Indonesian family law scholarship.

RESULT AND DISCUSSION

The decision of the Denpasar Religious Court in Case Number 406/Pdt.G/2020/PA.Dps provides a concrete example of the application of Indonesian marriage law and judicial authority in cases of mixed marriage divorce. The case involved a legal dispute between an Indonesian citizen and a foreign national whose marriage, previously solemnized under Indonesian religious and civil law, experienced irreconcilable marital conflict. The petitioner, an Indonesian Muslim woman, filed for divorce on the grounds of abandonment and continuous disputes, requesting legal dissolution before the Religious Court.

The central issues examined by the court included: (1) the validity of the marriage under Indonesian and Islamic law; (2) the jurisdictional authority of the Religious Court to adjudicate a divorce involving a foreign national; and (3) the legal consequences of divorce concerning citizenship and civil registration. The court first confirmed that the marriage was validly conducted and registered in Indonesia, thereby fulfilling the substantive and administrative requirements under Law Number 1 of 1974 on Marriage. Since the petitioner was an Indonesian Muslim, the case fell under the jurisdiction of the Religious Court in accordance

¹⁶ Muhaimin, *Metode Penelitian Hukum*, Mataram University Press, vol. 11, 2019; Pengadilan Agama Denpasar, *Putusan Nomor 313/Pdt.G/2021/PA.Dps [Perceraian Antara WNI Dan WNA]*.

with Article 49 of Law Number 7 of 1989 concerning Religious Courts, as amended by Law Number 3 of 2006.

In rendering its judgment, the Religious Court referred to several key legal instruments, including the Marriage Law (Law No. 1 of 1974), Government Regulation No. 9 of 1975, and the Compilation of Islamic Law (Kompilasi Hukum Islam – KHI). The court emphasized that every divorce among Muslims must be adjudicated before a court, as stipulated in Article 39 of the Marriage Law and Article 65 of the KHI, which require a judicial attempt at reconciliation prior to granting a divorce decree. The panel of judges determined that the marriage had irreparably broken down due to continuous disputes (*shiqaq*) and the absence of mutual respect, meeting the legal grounds for divorce under Article 19(f) of Government Regulation No. 9 of 1975 and Article 116(f) of the KHI.

Furthermore, the decision affirmed the authority of the Religious Court to adjudicate mixed marriages when one of the parties is a Muslim Indonesian citizen. The presence of a foreign national spouse does not preclude the Religious Court's competence, as long as the Indonesian spouse's religious affiliation determines jurisdiction. The court also clarified that the dissolution of marriage does not automatically affect the Indonesian spouse's citizenship status but may affect the foreign spouse's residency and immigration rights, which are regulated under Law Number 12 of 2006 concerning Citizenship and immigration regulations.

From a doctrinal standpoint, the court's legal reasoning reflects the integration of domestic legal principles with the framework of private international law. The court applied the doctrines of *lex loci celebrationis* (law of the place of marriage) and *lex fori* (law of the forum), ensuring that Indonesian law governed the dissolution process. This approach aligns with Articles 56 and 57 of the Marriage Law, which stipulate that mixed marriages solemnized in Indonesia are subject to Indonesian jurisdiction and legal consequences.

The following table presents a summary of the court's legal analysis and interpretation in the case:

Table 1. Summary of Legal Analysis and Judicial Interpretation in Mixed Marriage Divorce Case

Legal Aspect	Relevant Legal Provisions	Judicial Findings and Interpretation
Validity of Marriage	Law No. 1 of 1974 (Art. 1–2); KHI (Book I)	The marriage was validly conducted under Islamic and civil registration law.
Judicial Authority	Law No. 7 of 1989 (Art. 49); Law No. 3 of 2006	The Religious Court holds jurisdiction as one party is an Indonesian Muslim citizen.

Legal Aspect	Relevant Legal Provisions	Judicial Findings and Interpretation
Grounds for Divorce	Gov. Reg. No. 9 of 1975 (Art. 19); KHI (Art. 116)	Continuous disputes (<i>shiqaq</i>) provided sufficient legal grounds for divorce.
Procedural Requirements	Law No. 1 of 1974 (Art. 39); KHI (Art. 65–70)	Reconciliation efforts were attempted; divorce was granted after failure of mediation.
Citizenship Implications	Law No. 12 of 2006 (Art. 26–27)	Divorce did not affect the Indonesian spouse's citizenship but may affect the foreign spouse's residency.
Applicable Legal System	Law No. 1 of 1974 (Art. 56–57); Private International Law Principles	Indonesian law applied as <i>lex loci celebrationis</i> and <i>lex fori</i> in resolving the mixed marriage divorce.

Source: Processed from Decision No. 406/Pdt.G/2020/PA.Dps, relevant Indonesian marriage and citizenship laws, and the Compilation of Islamic Law (KHI)¹⁷

The Denpasar Religious Court's decision demonstrates the practical operation of Indonesian legal principles in addressing the complexities of mixed marriage divorce. It highlights the judiciary's commitment to maintaining legal certainty and protecting the rights of Indonesian citizens in transnational marital relationships. The ruling reinforces the principle that religious and civil authorities share concurrent responsibility in ensuring that marriage and divorce comply with both legal and moral standards.

The table above encapsulates the legal framework and judicial interpretation employed by the court, yet a deeper analysis reveals broader implications for legal doctrine and judicial practice in Indonesia. The Denpasar Religious Court's approach reflects an integration of normative Islamic jurisprudence and statutory law, demonstrating how Indonesia's dual legal system operates harmoniously in mixed marriage cases. The judges' reasoning was not confined to formal legal texts; rather, it extended to the spirit of justice (*maqāṣid al-sharī'ah*), emphasizing fairness, protection of rights, and preservation of social order.

Furthermore, the decision illustrates the Religious Court's institutional maturity in handling transnational cases. By affirming jurisdiction despite the foreign status of one party, the court safeguarded the legal sovereignty of Indonesia and prevented potential jurisdictional conflicts with foreign courts. This reinforces the principle that family law matters involving Indonesian Muslims remain under

¹⁷ Muchimah, "Pelaksanaan Peraturan Pemerintah No. 9 Tahun 1975 Dalam Perspektif Sosiologi Dan Antropologi Hukum Islam."

domestic adjudication, even when international elements are present.¹⁸ Such a stance is crucial in maintaining consistency, protecting national interests, and upholding the integrity of Indonesian law in global legal contexts.

The ruling also underscores the importance of judicial interpretation as a tool of legal harmonization. In mixed marriage cases, judges must navigate between diverse sources of law—religious doctrine, national statutes, and international principles. The Denpasar Religious Court successfully synthesized these frameworks, thereby contributing to the evolution of Indonesian family law jurisprudence. The court's reliance on both statutory provisions and interpretative doctrines indicates an emerging trend toward contextual judicial reasoning, where legal norms are applied dynamically to reflect social realities.

Beyond its doctrinal value, this case has significant sociological implications. It offers protection to Indonesian citizens—particularly women—who enter transnational marriages and later seek divorce. By ensuring that their cases remain under domestic jurisdiction, the Religious Court provides accessible legal remedies and prevents procedural complications that might arise under foreign legal systems. This judicial approach thus strengthens the state's obligation to guarantee access to justice for its citizens, aligning with broader human rights principles enshrined in national and international frameworks.

In sum, the decision of the Denpasar Religious Court represents more than a mere adjudication of marital breakdown; it is a manifestation of Indonesia's legal philosophy—a balance between religious values, legal certainty, and individual rights. It affirms that Indonesian law, through its Religious Court system, is capable of addressing modern challenges in transnational family relations while maintaining coherence with Islamic legal traditions. The ruling sets a valuable precedent for future cases involving mixed marriages, offering a clear judicial model that preserves national sovereignty, promotes justice, and embodies the spirit of legal pluralism in Indonesia's family law system.

CONCLUSION

The findings of this study demonstrate that mixed marriage divorce in Indonesia is governed by a coherent and integrated legal framework that combines elements of national law, religious law, and private international law. The analysis of Decision No. 406/Pdt.G/2020/PA.Dps of the Denpasar Religious Court confirms that the Religious Court possesses jurisdictional authority to adjudicate cases of mixed marriage when one of the parties is an Indonesian Muslim citizen. This

¹⁸ Wayan Ika et al., "Akibat Hukum Perceraian Pada Perkawinan Campuran," *Jurnal Analogi Hukum* 1, no. 3 (2019): 390–395, <https://doi.org/10.22225/ah.1.3.1820.390-395>.

jurisdictional competence is rooted in Article 49 of Law No. 7 of 1989 on Religious Courts, as amended by Law No. 3 of 2006, which provides that matters concerning marriage and divorce among Muslims fall within the exclusive authority of Religious Courts.

The court's reasoning reflects consistent application of Law No. 1 of 1974 on Marriage, Government Regulation No. 9 of 1975, and the Compilation of Islamic Law (KHI), emphasizing that all divorce proceedings must occur before a court and follow the reconciliation process mandated by law. The judicial panel found that continuous disputes (*shiqaq*) between the Indonesian wife and her foreign husband fulfilled the legal grounds for divorce under Article 19(f) of Government Regulation No. 9 of 1975 and Article 116(f) of the KHI. The judges' decision to grant the divorce was therefore consistent with both statutory and religious law, demonstrating procedural compliance and substantive justice.

In addition, the decision highlights the court's recognition of *lex loci celebrationis* (the law of the place where the marriage was conducted) and *lex fori* (the law of the forum), which together establish that Indonesian law governs the validity and dissolution of marriages solemnized within its territory. Even though one of the spouses was a foreign national, the court applied Indonesian legal principles to ensure legal certainty, sovereignty, and the protection of the Indonesian citizen's rights. This interpretation underscores Indonesia's adherence to the principle that differences in nationality do not nullify the Religious Court's authority, as long as the Indonesian spouse is subject to Islamic law.

The legal consequences of divorce in mixed marriages were also carefully considered by the court. The dissolution did not automatically alter the Indonesian spouse's citizenship status, but it could affect the foreign spouse's residency rights in Indonesia. This aspect demonstrates the interaction between family law and immigration law, revealing how the outcome of a mixed marriage divorce may have administrative implications beyond the family sphere. The court's balanced reasoning ensured that both national and international legal considerations were respected, in accordance with Law No. 12 of 2006 on Citizenship.

Doctrinally, this study affirms that the Religious Court's approach aligns with the principles of justice, legal certainty (*kepastian hukum*), and legal protection (*perlindungan hukum*) for citizens, which are core values of Indonesia's legal system. It also shows how domestic courts operationalize private international law principles in real judicial practice. The decision in Case No. 406/Pdt.G/2020/PA.Dps therefore serves as an important precedent illustrating

Indonesia's ability to reconcile domestic legal norms with transnational elements arising from globalization and international mobility.

In conclusion, the Religious Court plays a crucial role in resolving mixed marriage divorce cases by ensuring that religious law, national law, and international principles coexist harmoniously. The Denpasar Religious Court's decision reinforces the integrity of Indonesia's legal framework, provides legal certainty for Indonesian citizens married to foreign nationals, and promotes fairness in cross-border marital relations. Ultimately, this case illustrates that Indonesia's marriage and divorce law remains robust and adaptable in addressing the evolving realities of modern transnational families.

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