

ROYALTY REGULATORY FRAMEWORK ARRANGEMENTS FOR COMMERCIAL MUSIC CONCERT PERFORMANCES (CASE RULING NUMBER 825 K/Pdt.Sus-HKI/2025)

Muzacky Amri¹⁾ & Nabilla Desyalika Putri²⁾

¹⁾Universitas Negeri Surabaya, Surabaya, Indonesia, E-mail: muzacky.23665@mhs.unesa.ac.id

²⁾Universitas Negeri Surabaya, Surabaya, Indonesia, E-mail: nabillaputri@unesa.ac.id

Abstract. *This study aims to answer the research question of how copyright protection is enforced by songwriters in the context of commercial music use, specifically during music concerts, by analyzing Supreme Court Decision Number 825 K/Pdt.Sus-HKI/2025. The growth of Indonesia's music industry has increased the number of music concerts, often seen as a commercial way to exploit songs. However, royalty management at these concerts still faces legal challenges, especially in identifying who is responsible for paying royalties. This issue is exemplified by the copyright dispute between Agnez Mo and Ari Bias, which led to Supreme Court Decision Number 825 K/Pdt.Sus-HKI/2025. The research employs a normative juridical approach, incorporating legislative and case study methods. The study's findings show that the normative regulation governing music concert royalties in Indonesia designates event organizers as economic operators accountable for royalty payments via the National Collective Management Organization. Supreme Court Decision Number 825 K/Pdt.Sus-HKI/2025 affirms that vocalists cannot be automatically obligated to pay royalties unless it is demonstrated that they have received direct economic benefits. This ruling offers legal clarity and establishes a significant precedent in the enforcement of copyright law concerning music performances.*

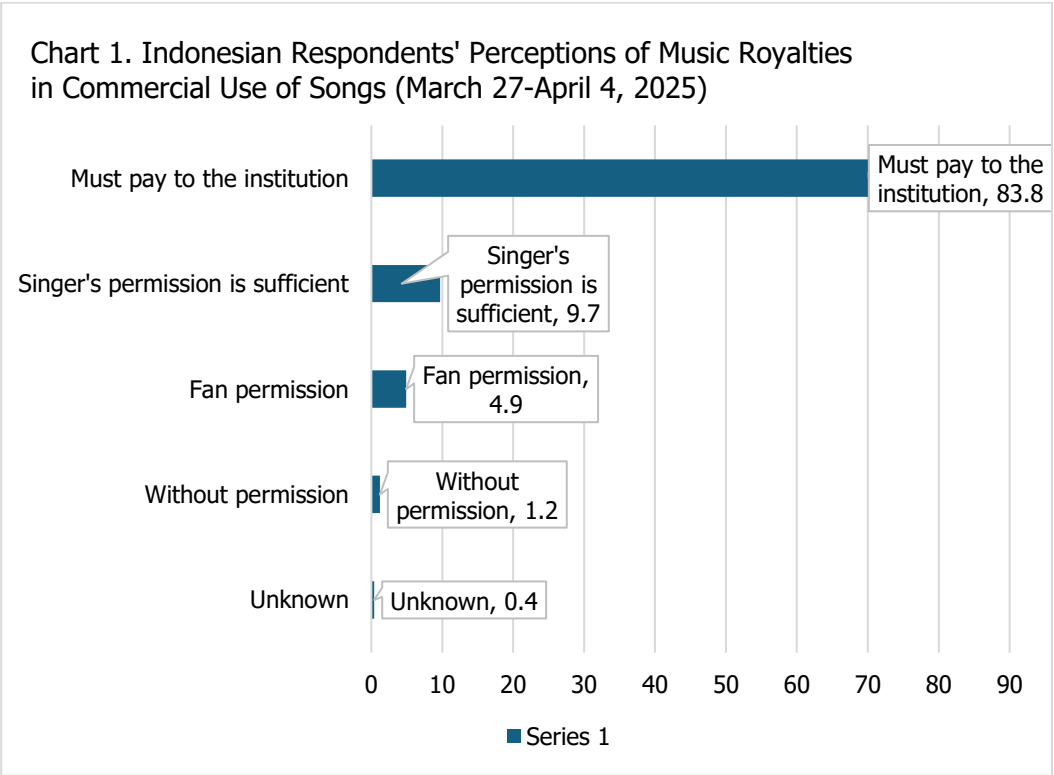
Keywords: *Copyright; Music Performances; Music Royalties; Royalty; Supreme Court Decision.*

1. Introduction

The topic of song and music copyright has become a core point of discussion in the global creative industry, including in Indonesia (Lubis & Faslah, 2025; Berliana & Silalahi, 2025). However, managing royalties for live performances remains challenging (Kharisma & Riswandi, 2022). This legal dispute is clearly exemplified by the case outlined in Decision Number 92/Pdt.Sus-HKI/Copyright/2024/PN Niaga Jkt. Pst, involving composer Ari Bias (Ginanjari, 2025) as the defendant. In their decision, the Panel of Judges issued a partial judgment in favor of Ari Bias, confirming that Agnez Mo's unauthorized use of the composition "Bilang Saja" violated the protections outlined in Article 9 paragraphs (2) and (3) of Law Number 28 of 2014 on Copyright (Copyright Law). The

court also ordered Agnez Mo to pay Rp1.5 million in damages billion (Rizki, 2025). This decision triggered debate among both professionals and music enthusiasts as the plaintiff and Indonesian artist Agnez Mo (Tokoh, 2024).

It's not surprising that people pay attention to this issue, considering Indonesians are also passionate music listeners. The latest Digital 2025: Indonesia report by Data Reportal reveals that 60.8% of internet users aged 16 and older watch music videos regularly (Irsyam, 2025). Empirical data from a Jakpat survey in August 2025 shows strong public engagement in live entertainment, with about 50% of Indonesian respondents who went to music concerts in 2025 attending two to three times annually. The market's outlook remains positive, as 74% of all respondents are interested in attending another music event within the next six months. (Ridwan, 2025). People attend music concerts for various reasons, including seeking entertainment, relieving stress, experiencing the thrill of a live performance, or celebrating special occasions (Muhamad, 2025). Uniquely, Indonesians who attend music concerts also have their own opinions on how royalties should be paid to songwriters. This is evident from a survey conducted by the Indonesian Public Opinion Discussion and Research Group (KedaiKOPI), which shows that the majority, or 83.8% of respondents, believe that royalties must be paid to the institution or songwriter for commercial use (mediakedaikopi, 2025). Other opinions are shown in the chart below.



Source: Katadata, 2025.

Following the initial ruling in Case No. 92/Pdt.Sus-HKI/Copyright/2024/PN Niaga Jkt. Pst, the defendant, Agnez Mo, filed a cassation appeal as a legal remedy. This appeal led to a reversal of the original judgment, with the defendant gaining the victory under Supreme Court Decision No. 825 K/Pdt.Sus-HKI/2025, conclusively settling the copyright

dispute between Agnez Mo and Ari Bias. The case arose from a civil lawsuit brought by Ari Bias against Agnez Mo, alleging that she performed and played her work at three music events without prior permission. The plaintiff claimed that the use of the work during concerts in Surabaya, Jakarta, and Bandung was commercial and violated both her economic and moral rights. Consequently, the plaintiff sought a court ruling that the defendant infringed copyright and demanded damages of Rp 1.5 billion, along with compensation for the violation of moral rights (Paladan & Sawitri, 2025).

During the judicial process, the defense raised a formal objection challenging the inclusion of all necessary parties and questioning the clarity of the factual allegations. However, the Commercial Court rejected the exception and partially granted the lawsuit, ruling that copyright infringement had occurred and awarding damages to the plaintiff. Unsatisfied with the verdict, the defendant appealed, arguing that the practice of music performances involved various legal entities, making it unfair for only the defendant to be held responsible. Therefore, the defendant requested that the Supreme Court overturn the previous decision.

In prior scholarly works, Risma Icha Firdausiah (2025) undertook a study entitled "Legal Analysis of the Copyright Dispute between Agnez Mo and Ari Bias: A Legal Review of Infringement and Dispute Resolution (Decision Number 92/Pdt. Sus-HKI/Cipta/2024/PN Niaga Jkt.Pst)." This study concentrated on the examination of an empirical case within a court of first instance (*judex facti*). The study concentrated on the construction of infringement, the judge's considerations, and the dispute resolution process in the Commercial Court. It employs a descriptive-analytical approach focused on applying positive legal norms to the case facts. Its primary contribution is providing insight into the practices of the first-instance court, rather than analyzing broader legal policy at the macro level (Firdausah, 2025). Furthermore, Tatik Nurjanah and Salma Azizah (2025) present a study titled "Problems with the Royalty System in Indonesia: A Case Study of Agnez Mo and Implications for Copyright Protection." The research primarily addresses structural and normative issues within the music royalty mechanism in Indonesia, notably the dissonance between legal regulations, the function of Collective Management Organizations (*Lembaga Manajemen Kolektif* LMK), and the commercial exploitation of music. The case of Agnez Mo serves as an empirical example to elucidate systemic problems, rather than as a subject for technical analysis. The research employs normative legal methods, incorporating both conceptual and case analysis approach (Nurjanah & Azizah, 2025). In contrast to preceding scholarly works, the present study focuses its analysis on the developmental trajectory of royalty regulations, explicitly referencing the latest jurisprudential milestone, specifically Supreme Court Decision Number 825 K/Pdt.Sus-HKI/2025. The authors undertook a comprehensive review of this decision, examining the progression of the case from its initial proceedings to the final ruling issued subsequent to cassation at the Supreme Court in August 2025.

This study seeks to answer the research questions, which are:

1. How is copyright protection enforced by songwriters in the context of commercial music use, specifically during music concerts?
2. How does the analysis of Supreme Court Decision Number 825 K/Pdt.Sus-HKI/2025 address the regulatory framework for royalties in commercial music concert performances?

Its main aim is to clarify the legal regulations around royalty systems for the commercial use of musical works in live concerts, using the case involving Agnez Mo as an example. The research examines Indonesia's royalty regulations, especially as music concerts grow in popularity and public interest. By analyzing these regulations, the study seeks to offer recommendations to improve royalty frameworks, fostering a fair environment for both creators and users of copyright.

2. Research Methods

This study utilizes a normative juridical method, which involves researching the principles of positive law as outlined in legislation, with the understanding that law is a rule (Putri, 2025). The research employed both a legislative and a case study approach. Case studies provided an in-depth examination of the Supreme Court's decision, specifically Decision Number 825 K/Pdt.Sus-HKI/2025, as a tangible example of resolving disputes over song copyright protection. In this study, the legal sources used consist of primary, secondary, and tertiary legal sources. Primary legal sources include Law No. 28 of 2014 on Copyright, Government Regulation No. 56 of 2021 on the Management of Royalties for Song and/or Music Copyrights, Minister of Law Regulation No. 27 of 2025 on the Implementing Regulations for Government Regulation No. 56 of 2021 on the Management of Royalties for Song and/or Music Copyrights, Judgment No. 825 K/Pdt.Sus-HKI/2025, and Judgment No. 92/Pdt.Sus-HKI/Copyright/2024/PN Niaga Jkt. Pst. Furthermore, the secondary legal materials used consist of books, scientific journals, and theses relevant to the research subject. The tertiary legal materials used consist of online sources that support and supplement both the primary and secondary legal materials. The analysis employs a qualitative approach (Furidha, 2024) utilizing legal interpretative analysis, which involves interpreting legal texts in a relatively literal manner (Cancak & Priyambodo, 2026; Mitchell, 2022). Additionally, content analysis is frequently employed as a research methodology for analyzing case law (Blackham, 2025). Both analytical approaches were selected due to the Authors' interpretation of statutory provisions, systematic analysis of the relationships among legal norms, interpretation of judges' legal reasoning (*ratio decidendi*), and formulation of an argument concerning legal subjects classified as "commercial users." The findings of the analysis are presented in narrative form, as well as through charts and tables.

3. Results and Discussion

3.1. Normative Framework for Music Concert Royalties in Indonesia

In Indonesia's growing entertainment industry, music concerts are among the most popular performances. Behind their success, many parties are involved, including songwriters whose works are used to entertain the audience (Nugroho & Setyawati, 2025). The role of the Event Organizer is essential in coordinating music concerts. They are responsible not only for technical logistics but also for ensuring the lawful use of copyrighted material during the event. Event organizers are legally required to verify that every musical work used has a valid license, with royalties paid through a Collective Management Organization in Indonesia, authorized by the song's creator. Failing to observe royalty payments can lead to legal issues such as copyright infringement, claims for damages, and potential criminal penalties as outlined in Copyright Law.

Legally, royalties are defined in Article 1, number 21 of the Copyright Law as a form of "compensation for the exploitation of the economic rights of a work or a related rights product, lawfully received by the creator or the holder of such related rights." Meanwhile, economic rights are defined as "economic rights are the exclusive rights of the Creator or Copyright Holder to obtain economic benefits from the creation." Specifically, Article 9 paragraph (1) of the Copyright Law stipulates that the Author or Copyright Holder possesses economic rights which encompass, among others: "a) the publication of the Work; b) the reproduction of the Work in any form; c) the translation of the Work; d) the adaptation, arrangement, or transformation of the Work; e) the distribution of the Work or copies thereof; f) the performance of the Work; g) the public display of the Work; h) the communication of the Work; and i) the rental of the Work." Regarding commercial use at music concerts, there is a "performance artist's economic right," which states that "performance artists have economic rights." Provisions on the commercial use of copyright are outlined in Article 23 paragraph (5) of the Copyright Law. It states that "Any person may commercially use a work in a performance without prior permission from the author, as long as the author receives compensation via a collective management organization." The payment of royalties for commercial use is additionally governed by Government Regulation No. 56 of 2021.

Pursuant to Article 1 paragraph (22) of the Copyright Law, a Collective Management Organization is legally defined as "a non-profit legal entity authorized by creators, copyright holders, and/or holders of related rights to manage their economic rights" (Aliansyah, 2022). Meanwhile, Government Regulation No. 56 of 2021 creates a centralized system for collecting and distributing royalties via the National Collective Management Organization (*Lembaga Manajemen Kolektif Nasional* /LMKN). The LMKN is defined as a "non-state-budget government agency established by the Minister under the Copyright Law, authorized to collect, pool, and distribute royalties, and to manage the economic rights of creators and related rights holders in the field of songs and/or music." (Rabbani, 2023). In this context, LMKN serves as an essential intermediary for any party involved in the "commercial use of songs and/or music through public services, for which royalties are paid to creators, copyright holders, or related rights holders." Additionally, the scope of these commercial public services is specifically outlined in Article 3 paragraph (2) of the a quo Government Regulation, commercial uses of songs and/or music encompass various types of business activities and services that utilize copyrighted works as part of their business operations. Such uses include, among others, "the organization of commercial seminars and conferences; businesses in the culinary and nightlife sectors, such as restaurants, cafes, pubs, bars, bistros, nightclubs, and discos; the organization of music concerts; use on public transportation such as airplanes, buses, trains, and ships; the organization of exhibitions and bazaars; the movie theater industry; on-hold music services for telephone lines; banking institutions and office complexes; shopping centers or retail areas; recreational venues; television and radio broadcasting organizations; the hospitality industry and all its supporting facilities; and karaoke establishments" (Salmaa et al., 2025).

This institution is responsible for tracking song usage, collecting royalties from commercial users, managing funds, and distributing them to creators, rights holders, and related rights owners (Rachman, 2022) This mechanism aims to prevent abuse of bargaining power, stop unauthorized use, and ensure that any commercial use of songs balances the interests of businesses and those of the public creators (Oktavian, 2025). As an implementing regulation of the aforementioned Government Regulation, Minister

of Law and Human Rights Regulation No. 27 of 2025 was promulgated to serve as the implementing regulation for Government Regulation No. 56 of 2021 concerning the Management of Royalties for Song and/or Music Copyrights. This regulation governs the electronic system for recording intellectual property rights, particularly for songs. It enables creators, phonogram producers, and performers to record their rights more efficiently, making it easier to identify parties eligible for royalties and reducing potential disputes. An integrated database aims to foster an accurate, transparent system for song copyright information (Rustianto et al., 2025).

To optimize the economic advantages obtained from the commercial utilization of copyrighted compositions, rights holders of songs and musical works depend on organized marketing frameworks. The process of asserting these rights commences with official registration with a Collective Management Organization (CMO) or Collective Management Body (CMB), which has been duly authorized and approved for operation by the Minister of Law and Human Rights (Ramadhani, 2025). This institution is a non-profit organization structured around the artist's profession. For instance, singers are part of a collective management organization dedicated solely to them, while composers belong to a separate organization for composers. The same applies to phonogram producers and musicians. This collective management organization greatly enhances the efficiency of collecting and distributing royalties from copyright users. Its effectiveness allows copyright holders and related rights owners to better organize the collection and use of the economic rights linked to their creative works (Tambunan & Silahahi, 2025).

3.2. Analysis of Supreme Court Decision Number 825 K/Pdt.Sus-HKI/2025 between Agnez Mo and Ari Bias at the Cassation Level

This dispute originated from Ari Bias's report against Agnez Mo, alleging copyright infringement for the singer's unauthorized performance of Ari Bias's song "Bilang Saja" at three events in Surabaya, Jakarta, and Bandung. Ari Bias, who has composed numerous songs for Agnez Monica, asserts there is a lack of clarity regarding royalty payments and contends that the singer's management is less responsive than that of other parties (Pitasari, 2025). Attempts to resolve the issue through a closed summons without response led to the issuance of an open summons directed at HW Group, the event organizer. This was based on alleged violations of Articles 9, paragraphs 2 and 3, of the Copyright Law, along with a claim for Rp 1.5 billion in total damages. The formal lawsuit was filed at the Central Jakarta Commercial Court in September 2024, marking a transition from a private dispute to a legal process that clarifies each party's legal position (Nugroho, 2025).

The trial, held from September to December 2024, revealed the dynamics of arguments between the plaintiff's and defendant's legal teams. Agnez Mo's representatives demonstrated their willingness to cooperate and believed their performances adhered to regulations. Conversely, Ari continued to claim that his work was used commercially without his permission. Initially, the judges ruled there was a violation, imposing a fine of Rp 500 million for each of the three performances. This decision underscored the multiple responsibilities within the music performance ecosystem. While licensing is often managed by organizers, the use of works must still respect the creator's economic rights. The court aimed to stress that licensing administration cannot be separated from the core protection of the work (Santoso, 2025).

A major change occurred when Agnez filed an appeal, and the Supreme Court approved her petition in August 2025 through Decision Number 825 K/Pdt.Sus-HKI/2025. This ruling overturned the first court's verdict, removing the obligation to pay the fine. This appeal process shows that resolving copyright disputes follows a tiered system that allows for corrections to earlier judgments. At the same time, these developments reveal how legal considerations at the final stage serve as a reference to ensure legal certainty, while also highlighting that interpretations of how works are used and the responsibilities of the involved parties must be carefully examined throughout the entire judicial process. In summary, the case progression and timeline between Agnez Mo and Ari Bias can be illustrated in the following chart (Prasetyo, 2025).

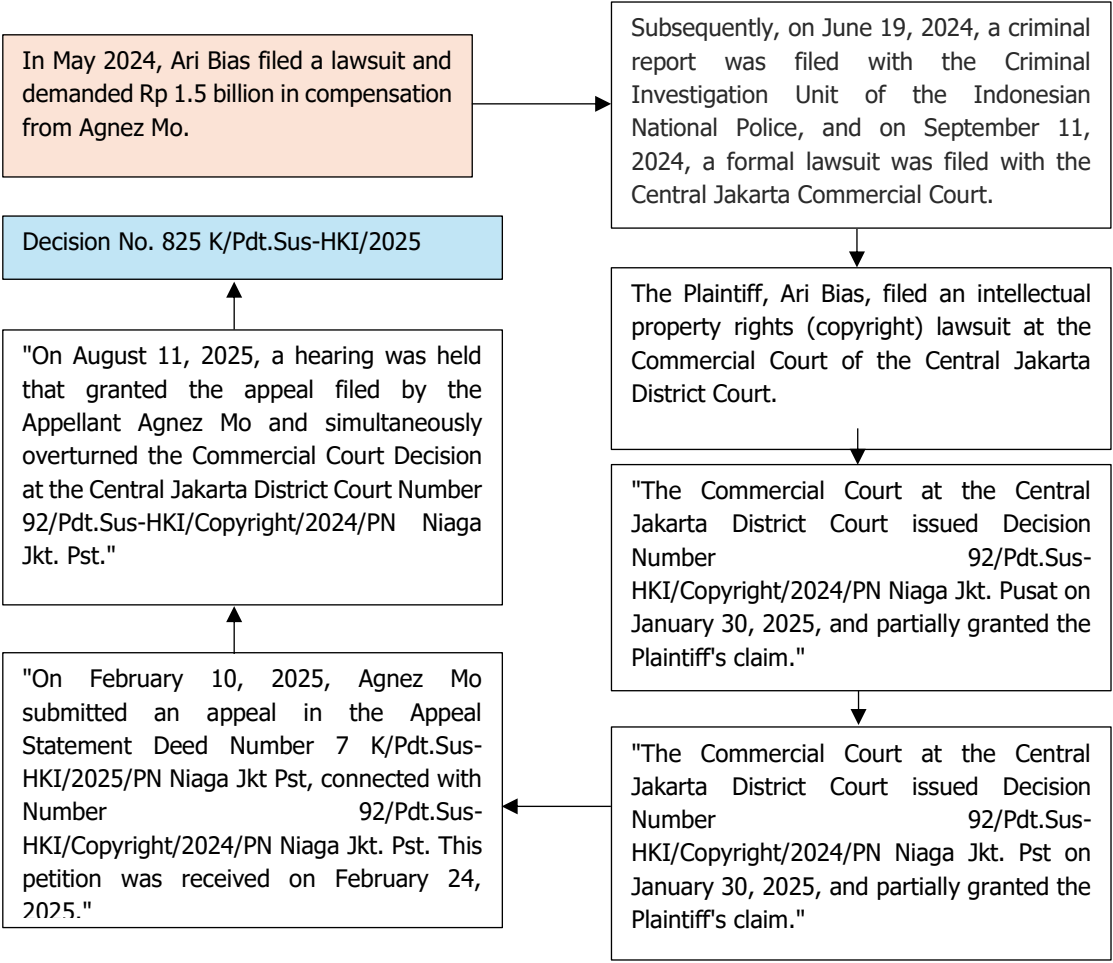


Chart 2. Construction of the Case Position and Timeline between Agnez Mo and Ari Bias

Sources: Kompas.id and Supreme Court Decision Number 825 K/Pdt.Sus-HKI/2025 (Aditya & Damarjati, 2025).

At the trial court level, the proceedings leading to the Central Jakarta Commercial Court's Decision No. 92/Pdt.Sus-HKI/Copyright/2024/PN Niaga Jkt.Pst drew controversy and widespread criticism from various sectors. The case was resolved by a panel of judges at the Central Jakarta District Court's Commercial Court, led by presiding judge Marper

Pandiangan, with associate judges Khusaini and Faisal. The panel's ruling established that Agnez Mo had definitively and legally infringed copyright by using the song “Bilang Saja” for commercial purposes without obtaining permission or a license from the songwriter, Ari Bias. This act was found to violate the plaintiff’s economic rights, resulting in financial losses. Considering these factors, the Commercial Court Panel of Judges at the Central Jakarta District Court determined that the plaintiff’s damages claim is well-founded legally. This conclusion is supported by the commercial context, where the three concerts took place in key cities, attracting large audiences, and the entire event series was organized by PT Aneka Bintang as the official organizer (Kumalasanti, 2025). The ruling, No. 92/Pdt.Sus-HKI/Hak Cipta/2024/PN Niaga Jkt. Pst, in its ruling, the panel of judges first dismissed all of the Defendant’s motions to dismiss. Next, regarding the merits of the case, the court granted the Plaintiff’s claim in part. The panel of judges found that the Defendant had committed an unlawful act in the form of copyright infringement by commercially using the song titled “Bilang Saja,” composed by the Plaintiff, in three concerts without first obtaining permission from the Plaintiff as the composer. For these acts, the Defendant was ordered to pay the Plaintiff material damages in the amount of Rp1,500,000,000.00 (one billion five hundred million rupiah), consisting of Rp500,000,000.00 for the use of the song at the concert on May 25, 2023, at W Superclub Surabaya, Rp500,000,000.00 for the concert on May 26, 2023, at The H Club in Jakarta, and Rp500,000,000.00 for the concert on May 27, 2023, at W Superclub in Bandung. In addition, the panel of judges also ordered the Defendant to pay court costs in the amount of Rp1,580,000.00 (one million five hundred eighty thousand rupiah). As for the Plaintiff’s claims other than those that have been granted, the panel of judges decided to dismiss all remaining claims.

The ruling caused significant debate. In the filed motion, Agnez Mo argued that the obligation to pay royalties is solely the responsibility of the concert organizer and does not imply any liability for the artist or performer involved. She stressed that during her performance, the event organizer was responsible for obtaining licenses and paying royalty fees. This case sparked a legal debate over who should pay royalties for music concerts whether the performing artist, the event organizer, or the Collective Management Organization (Suwarni & Farida, 2025). This ruling has several significant implications for the Indonesian music industry. First, it underscores the urgent need to overhaul copyright laws related to live performances. Clearer rules regarding royalty payment responsibilities are essential to reduce legal uncertainty and prevent future conflicts. Second, increased transparency in royalty management must be ensured (Purnamaningrat & Suryana, 2025).

Furthermore, Agnez Mo challenged the earlier decision. In Decision No. 825 K/Pdt.Sus-HKI/2025, the Supreme Court's Panel of Justices found that the Commercial Court of the Central Jakarta District Court misapplied the law (*judex juris*). The full details and reasoning behind the decision in Case No. 825 K/Pdt.Sus-HKI/2025 are thoroughly summarized in the table below.

Table 1. The Analysis Elements and Details on Case No. 825 K/Pdt.Sus-HKI/2025

No.	Analysis Elements	Details
1.	Parties	1. Agnes Monica Muljoto (Agnez Mo) as the Appellant, formerly the Defendant 2. Arie Sapta Hernawan (Ari Bias) as the Respondent in the Cassation Appeal, formerly the Plaintiff

No.	Analysis Elements	Details
		3. Pt Aneka Bintang Gading as Co-Respondent, formerly Co-Defendant
2.	The Panel of Judges	1. Chairman of the Panel of Judges: I Gusti Agung Sumanatha, S.H., M.H., 2. Members: a. Supreme Court Justice Dr. H. Panji Widagdo, S.H., M.H., and b. Dr. Rahmi Mulyati, S.H., M.H.
3.	Deputy Registrar	Febry Widjajanto, S.H., M.H.,
4.	The hearing is open to the public	Yes
5.	Attended by the Parties	No
6.	Previous ruling	Decision No. 92/Pdt.Sus-HKI/Copyright/2024/PN Niaga Jkt. Pst
7.	Date received	Received at the Commercial Court Registry of the Jakarta Central District Court on February 24, 2025
8.	Request of the Appellant	"In her appellate brief, Agnez Mo formally requests the reversal of the Judgment issued by the Central Jakarta Commercial Court No. 92/Pdt.Sus-HKI/Copyright/2024/PN Niaga Jkt. Pst. dated January 30, 2025, and seeks the imposition of court costs against the Respondent. In her motion to dismiss, she insists that the Panel of Judges fully accept her objection and declare the Respondent's lawsuit as entirely inadmissible (<i>niet ontvankelijke verklaard</i>). Concerning the substantive issues, the Plaintiff seeks to be acquitted of the copyright infringement allegations and contends for the complete annulment of the Rp1.5 billion damages awarded previously, which was based on the unauthorized use of songs valued at Rp500 million each in concerts held at W Superclub Surabaya, The H Superclub Jakarta, and W Superclub Bandung in May 2023. Lastly, the Plaintiff requests that all litigation expenses be borne by the Defendant or resolved in a manner that is as equitable as possible, consistent with the principles of <i>ex aequo et bono</i> ."
9.	Counter-Memorial of Cassation	"The Respondent in the Cassation Appeal has filed a Counter-Memorial of Cassation on March 20, 2025, which essentially rejects the cassation appeal filed by the Appellant in the Cassation Appeal."
10.	Judgment	1. "Granting the cassation petition of the Cassation Petitioner Agnes Monica Muljoto (Agnez Mo); 2. To annul the Decision of the Commercial Court at the Central Jakarta District Court Number 92/Pdt.Sus-HKI/Copyright/2024/PN Niaga Jkt. Pst., dated January 30, 2025; Ruling on its own: In the Exception: 1. Granting the Defendant's exception; On the Merits of the Case: 1. Declaring the Plaintiff's lawsuit inadmissible; 2. Ordering the Respondent in the Cassation Appeal to pay the costs of the proceedings at all levels of court, which at the cassation level are set at Rp5,000,000.00 (five million rupiah)."

Processed by the Authors, 2026.

A judge's reasoning fundamentally demonstrates a careful assessment of how rational and factually relevant the circumstances are that support the legal decision, whether at the Supreme Court or in lower courts. These considerations are documented in writing and are a vital part of the court's ruling. During decision-making, judges must analyze various factors that could influence the imposition or reduction of liability on the parties. Every judge has a legal obligation to articulate their arguments and opinions in writing when examining a case, which provides the logical basis for the decision (Firdausah, 2025).

The panel of judges' deliberations encompass an in-depth analysis of legal considerations, coupled with a comprehensive assessment of the facts disclosed during the trial. Accordingly, it is imperative that the panel possesses a robust understanding of legal theory and practice, relevant case law, and the particularities intrinsic to the case under review. When making a decision, judges should be objective, prudent, and fair, as they represent the state in upholding law and justice and are trusted by the public. When a legal question is not directly addressed in legislation, judges are responsible for discovering the law by examining, interpreting, and applying existing legal principles (Khatintri, 2025).

Procedurally, the judge's considerations occur after the case has been declared complete. Then, the judge who reviews and rules on the case deliberates to reach a decision that aligns with the law's objectives. At this stage, judges are required to combine their rational and moral abilities when assessing and establishing legal facts based on the evidence presented at trial, while also properly interpreting legal norms as a reflection of the exercise of judicial authority on behalf of the state. In adjudicating copyright disputes, judges need to make a comprehensive evaluation of the various relevant legal aspects. This evaluation includes several key aspects (Hsb, 2025).

The initial aspect necessitates that the panel of judges undertake a comprehensive review of the applicable legal statutes and regulations, with particular emphasis on Law No. 28 of 2014 concerning Copyright and incorporate relevant case law references. Additionally, judges need to consider the legal principles and notions of justice that have developed through legal practice and society. Second, the philosophical aspect, which aims to achieve substantive justice so that the verdict does not result in disproportionate losses to either party. This aspect also reflects efforts to protect creators' rights, ensuring the authenticity of their work and their economic benefits. Third, the sociological aspect mandates that judges consider the social and economic impacts of their decisions on both creators and users of copyrighted works, while balancing individual and public interests in accessing valuable creative works that benefit society (Rahmawati, 2025).

In addition to considering these aspects, judges in deciding copyright disputes must also be guided by fundamental principles of justice. The principle of legal certainty holds that decisions must be based on clear and applicable legal norms, thereby providing parties with predictable legal protection. The principle of justice requires that decisions do not cause injustice, either to the creator as the rights holder or to the user of the copyrighted work. Furthermore, the principle of proportionality requires judges to assess the balance between the form of copyright infringement and the legal consequences imposed, taking into account the public interest. Finally, the principle of transparency requires that decisions be made openly and accountably, which is reflected in the pronouncement of

decisions in open court as a form of accountability of the judicial institution (Ilham, 2026).

Supreme Court Decision Number 825 K/Pdt.Sus-HKI/2025, issued on August 11, 2025, reversed the lower court's ruling against singer Agnez Monica in a song royalty dispute, reaffirming the principle that economic users are not automatically considered performers who are required to comply with collective royalty mechanisms (Mahfudloh, 2025). The Supreme Court rejected the claim for direct royalty payments to singers and affirmed that the primary obligation lies with the performance organizer. A quo decision reaffirms the Copyright Law framework, which designates promoters as the primary economic users and clarifies performers' scope of responsibility. In the context of music royalty regulations, Government Regulation No. 56 of 2021 and Minister of Law and Human Rights Regulation No. 27 of 2025 focus on the collection, pooling, and distribution of royalties through Collective Management Organizations, so the Supreme Court's decision aligns with the governance framework established in these implementing regulations (Herlambang, 2025).

The cassation judge dismissed the argument that every performer automatically assumes liability for royalties. The rationale is that Article 23, paragraph (5), and Article 87, paragraph (1), of the Copyright Law impose obligations on economic users. Consequently, promoters or event organizers who gain economic advantages from a performance are obliged to serve as the licensing party and to remit royalties via a Collective Management Organization (CMO). In practice, the Supreme Court rejected the precedent that assigned liability to singer absent evidence of direct economic benefit, as such an approach would contravene principles of justice and legal certainty. The Copyright Law delineates the definitions of copyright, related rights, and licensing obligations, while Government Regulation No. 56 of 2021 pertains to the system of collection, pooling, and distribution of song/music royalties via a national data center and collective institutions. Additionally, the Ministry of Law and Human Rights Regulation No. 27 of 2025 enhances the governance of collective management organizations, ensuring alignment between commercial users, LMKN, and creators/rights holders. Accordingly, the Supreme Court's decision to dismiss liability on performers is consistent with a more rigorous regulatory framework (Awwabi, 2021).

The ruling rejected the imposition of royalties on Agnez Mo because the Copyright Law does not automatically apply to performers; rather, it applies to economic users who derive commercial benefits. In the context of concerts, promoters or organizers who handle tickets, sponsors, and stage usage fees are considered economic users. Consequently, the responsibility to acquire a license and to pay royalties falls solely on the organizer. This complies with the directives of Government Regulation No. 56 of 2021, which mandates that any commercial utilization of songs or music such as in seminars, restaurant operations, the hospitality sector, concerts, and public transportation must be conducted through the royalty collection mechanism managed by a Collective Management Organization. The Supreme Court's decision to reject the charges against Agnez Mo aligns with this logic: "if the promoter has collected and distributed royalties through the LMKN, then there is no legal reason to repeatedly prosecute the performers." Ministry of Law and Human Rights Regulation No. 27 of 2025 clarifies the institutional structure of LMKN, data transparency obligations, and synchronization between LMK creators and rights owners. In this dispute, the Supreme Court's decision to dismiss the charges against the singer can be seen as an effort to

uphold the credibility of the collective system. When performers have legal protection, economic users will be more likely to adhere to royalty collection procedures through the collective institution regulated by Government Regulation No. 56 of 2021 and clarified through Minister of Law and Human Rights Regulation No. 27 of 2025 (Purnamaningrat & Suryana, 2025).

The Copyright Law serves as the primary reference for the Supreme Court in dismissing claims for royalty charges to singers and in affirming the responsibilities of promoters as economic users. This regulation offers a comprehensive legal framework for copyright protection, explicitly incorporating the safeguarding of moral rights alongside economic rights. Furthermore, this legal instrument defines a duration of protection, which extends for the lifetime of the creator plus an additional seventy years following their death (Svinarky, 2023). Government Regulation No. 56 of 2021 and Minister of Law and Human Rights Regulation No. 27 of 2025 complement the Copyright Law with procedures for collection, aligning with this policy direction. Government Regulation No. 56 of 2021 governs nightclubs, concerts, transportation, cinemas, hotels, karaoke businesses, and broadcasting institutions. The core reasoning of the Panel of Judges in the mentioned decision consistently aligns with the provisions of the Copyright Law, Government Regulation No. 56 of 2021, and Regulation of the Minister of Law and Human Rights No. 27 of 2025. By ruling out the direct royalty obligations on the singer, the Supreme Court reaffirmed that primary liability lies with the economic user and the national collective management system. This approach supports principles of justice, legal certainty, and transparent royalty management. The ruling also sets a significant precedent in Indonesian copyright law, offering doctrinal clarity that event organizers or promoters, rather than performing artists, are responsible for obtaining licenses and paying royalties. This precedent enhances protection for copyright owners while reinforcing justice and legal certainty within the creative industry (Zuhdi, 2023).

3.2.1. Royalty Regulations for the Commercial Use of Creations at Music Concerts

From a civil law standpoint, the regulation of royalties in music concerts depends on the legal relationships created by the agreements. Such contractual instruments serve as essential legal mechanisms that translate public norms into particular rights and obligations, which are legally binding upon the parties involved in the agreement (Nurwati, 2024). Without a clear agreement, identifying the responsible party for royalty payments often relies on judicial interpretation, which can lead to legal uncertainty. An agreement aligns with contract law provisions outlined in the Civil Code. Specifically, Article 1313 of the Civil Code delineates a contract as a legal act through which one or more individuals commit themselves to one or more other individuals (Zildjian, 2024).

To ensure the validity and legal enforceability of a contract, the fulfillment of the requirements for a valid agreement, as stipulated in Article 1320 of the Civil Code, is both cumulative and mandatory. These elements encompass the agreement of the parties, the capacity to enter into a contract, a specific subject matter, and a lawful cause. In the context of a music concert, the "specific subject matter" pertains to the license to use copyrighted works and the obligation to pay royalties, whereas the "lawful cause" reflects the purpose of utilizing the work, which must not be contrary to the law (Hanim et al., 2025). If all these conditions are met, the agreement in question becomes utterly binding. This aligns with the doctrine of *pacta sunt servanda*, as articulated in

Article 1338 paragraph (1) of the Civil Code, which stipulates that every validly executed agreement is binding upon the parties who have consented to it. This principle emphasizes that the execution of agreed-upon royalty payment obligations must be undertaken in good faith, as expressly mandated in Article 1338 paragraph (3) of the Civil Code. Therefore, the agreement functions as a foundation for legal certainty in attributing the responsibility for royalty payments and serves as a preventative measure to avert any potential disputes (Setiawan, 2021).

When organizing music concerts, the agreement should ideally cover performance licenses, royalty payment methods, and the distribution of legal responsibilities between performers and event organizers. A performance license is necessary to adhere to Article 9 paragraph (1) letter c of the Copyright Law, which grants creators exclusive rights to allow or forbid performances. This helps clarify responsibilities for obtaining permits and paying royalties, preventing the shifting of blame if copyright infringement occurs (Wicaksono, 2024). Royalty governance and management mainly operate through licensing agreements as outlined in Government Regulation No. 56 of 2021. However, according to Regulation of the Minister of Law and Human Rights No. 27 of 2025, these mechanisms can be exempt from the need for a formal license agreement if royalty payments are regularly sent to the National Collective Management Organization (*Lembaga Manajemen Kolektif Nasional* /LMKN). This difference in regulation should not be seen as a conflict of norms but rather as a variation in approach within a single, unified legal framework (Baity & Rakhmawati, 2025). According to Government Regulation No. 56 of 2021, royalties are managed based on licensing principles. This requires that any commercial use of songs and/or music must first secure prior approval from the rights holder via a valid licensing agreement. This underscores that the rights holder's consent is the legal basis for exercising economic rights, with the license serving as both the legitimacy for use and a tool for collection royalties (Adela & Isradjuningtias, 2022).

Meanwhile, Ministry of Law and Human Rights Regulation No. 27 of 2025 delineates a more operational mechanism by rendering the obligation to pay royalties as a legal requirement associated with commercial use, without invariably necessitating a license agreement. Under this framework, provided the usage is for commercial purposes, the user remains legally obliged to remit royalties through LMKN. This scheme does not nullify the concept of licensing; rather, it offers an implicit, standardized collective approach in which permission to use is deemed to be conferred through a collective management system sanctioned by legislation. Systemically, this distinction reflects the division of regulatory functions between fundamental norms and supplementary norms. While Government Regulation No. 56 of 2021 establishes a fundamental principle mandating that the utilization of economic rights must be grounded in a licensing agreement, Minister of Law and Human Rights Regulation No. 27 of 2025 delineates technical procedures aimed at ensuring the efficacy and optimization of royalty collection and distribution practices (Dirkareshza et al., 2025).

From a civil law perspective, the failure to fulfill the stipulated royalty payment obligation constitutes a breach of contract. Such a breach entails legal consequences, including an obligation to perform, payment of damages, or other remedies recognized under the doctrine of contract law in the Indonesian Civil Code. Clear contractual clauses on royalty amounts, payment deadlines, and penalties for violations serve as primary parameters for evaluating the presence of a breach and its associated legal implications. Therefore,

the existence of an agreement is integral in providing an objective basis for judicial assessment in civil disputes related to music concert royalties (Paendong & Taunaumang, 2022). Several laws and regulations outline the management of royalties for music concerts, as shown in the following table.

Table 2. Royalty Regulations for Music Concert

Aspects of Music Concert Royalty Regulations	Law No. 28 of 2014 concerning Copyright	Government Regulation No. 56 of 2021	Ministry of Law and Human Rights Regulation No. 27 of 2025
Qualification of Music Concerts	"Music performances as a form of commercial use of copyrighted works" (Article 23 paragraph (2))	"Concerts are commercial public services" (Articles 3 and 4)	"Follows the classification of commercial use"
Creator's Rights to Royalties	"The creator economic receive royalties, as provided in" (Article 8 and Article 9 paragraph (1) letter c)	"The right to royalty as a representation of the economic rights inherent to creators and holders of related rights" (Article 5)	"Royalties are managed as economic rights through Collective Management Organizations"
Parties Obligated to Pay Royalties	"Parties who commercially exploit creations" (Article 23 paragraph (5))	"The obligation to pay royalties for the use of works or related rights product in the context of commercial public services" (Article 9 paragraph (1))	Not explicitly formulated
Royalty Payment Mechanism	"Royalty payments are made through a Collective Management Organization" (Article 87 paragraph (1))	"The collection and distribution of royalties through the National Collective Management Organization (LMKN) or Collective Management Organization (LMK)" (Article 10 and Article 11)	"The formal procedures for the collection and distribution of royalties by Collective Management Organizations as regulated in Minister of Law and Human Rights Regulation No. 36 of 2018 as amended by Minister of Law and Human Rights Regulation No. 9 of 2022."
Role of the Collective Management Organization	"The Collective Management Organization acts as the creator's representative to collect and distribute royalties" (Articles 88 and 89)	"The role of the National Collective Management Organization as the sole coordinator at the national level in integrating royalty collection activities" (Articles 12 and 13)	"The regulatory framework governing the registration mechanism, institutional governance, and public accountability of Collective Management Organizations"
Timing and Procedures for Payment	Not regulated technically	"Royalty payments are made based on the scheme established by the National Collective	"Regulated in the operational guidelines of the Collective Management Organization"

Aspects of Music Concert Royalty Regulations	Law No. 28 of 2014 concerning Copyright	Government Regulation No. 56 of 2021	Ministry of Law and Human Rights Regulation No. 27 of 2025
		Management Organization/Collective Management Organization" (Article 14)	
Certainty of Royalty Flow	The norms are general and open to interpretation	More technical, but not yet detailed in terms of the division of responsibilities among concert participants	Administrative and implementational in nature

Compiled by the Authors, 2026

The table above shows that Indonesia's legal framework for music concert royalties is evolving gradually, reflecting an ongoing process of normative development. Nonetheless, it also highlights enduring fundamental issues concerning legal certainty and the allocation of responsibilities. Copyright Law outlines core principles by categorizing a music concert as commercial use of a copyrighted work and confirming the creator's right to receive royalties as compensation. However, the provisions within this law remain predominantly general, particularly in delineating the specific parties responsible for paying royalties and the technical procedures for effectuating such payments (Purwadi et al., 2025).

As an implementing regulation, Government Regulation No. 56 of 2021 clarifies that music concerts are considered commercial public services and emphasizes the obligation to pay royalties for such activities. This regulation also reinforces the LMKN's role as the coordinator of royalty collection and distribution (Natasya & Putra, 2025). However, this Government Regulation has not fully addressed the issues at the implementation level, as the responsibilities among concert participants such as organizers, performing artists, and supporting parties are not clearly defined, leaving room for interpretation and disputes. Meanwhile, the Ministry of Law and Human Rights Regulation No. 27 of 2025 emphasizes administrative and operational aspects, especially concerning governance, registration, and accountability of Collective Management Institutions. This regulation is crucial for strengthening the processes for collecting and distributing royalties (Wicaksono, 2024).

In fact, it appears that Indonesia's regulatory framework for music concert royalties has shifted from general standards to more detailed, administrative rules. However, there is still potential for conflict between norms (Sukmawati et al., 2025). The ambiguity surrounding the party responsible for disbursing royalties possesses the potential to engender legal uncertainty, as exemplified in various copyright disputes, notably in Decision Number 92/Pdt.Sus-HKI/Copyright/2024/PN Niaga Jkt. Consequently, it is imperative to implement more comprehensive and explicit regulatory enhancements, especially in delineating the division of responsibilities among concert organizers. Such measures are essential to ensure the effective protection of creators' economic rights while concurrently providing legal certainty for all stakeholders within the music industry.

4. Conclusion

The legal framework for music exploitation royalties during commercial performances in Indonesia shows a trend towards more specific regulations, although its existing rules still contain ambiguities, especially concerning operational liability. On a theoretical level, the combined provisions of Law Number 28 of 2014 on Copyright, Government Regulation Number 56 of 2021, and the Regulation of the Minister of Law and Human Rights Number 27 of 2025 have established a doctrinal basis by defining music concerts as a form of commercial use of copyrighted works, which requires centralized royalty payments through the National Collective Management Organization. These rules gained further legal backing through the Supreme Court's reasoning in Decision Number 825 K/Pdt.Sus-HKI/2025. By overturning the initial court ruling, this cassation ruling clarifies that the primary legal responsibility for paying royalties lies solely with the promoter or event organizer, who benefits financially from the event. This civil obligation cannot be unilaterally shifted to the singer or performer. Within the practical scope relevant to creative industry stakeholders, anyone entering into performance agreements must include clear, explicit, and transparent contractual clauses. This proactive approach is vital for clearly assigning responsibilities related to license management and royalty payments to LMKN before events occur, thereby reducing the risk of future civil disputes. Enhancing this contractual framework is essential for aligning the legal interests of songwriters, promoters, and performing artists within the rapidly changing national music industry landscape. Additionally, the results of this study pave the way for future research, especially those examining the accuracy and effectiveness of database synchronization in LMKN's digital royalty collection system after the enactment of Ministerial Regulation Number 27 of 2025. Such research aims to identify technical challenges related to transparency in electronic intellectual property fund distribution. Furthermore, the study's limitations highlight the need for comprehensive comparative analyses on copyright agreement law standardization and the implementation of fair direct licensing methods across different international jurisdictions.

5. References

Journals:

- Adela, P., & Isradjuningtias, A. C. (2022). Perlindungan Hukum Terhadap Pemegang Hak Cipta Musik Berdasarkan Peraturan Pemerintah Nomor 56 Tahun 2021 Tentang Pengelolaan Royalti Hak Cipta Lagu dan Musik. *Jurnal Kewarganegaraan*, 6(3), 6545–6554.
- Aliansyah, M. A. (2022). Tinjauan Normatif Kedudukan Lembaga Manajemen Kolektif Nasional (LMKN) sebagai State Auxiliary Organ berdasarkan Peraturan Pemerintah No. 56 Tahun 2021 tentang Pengelolaan Royalti Hak Cipta Lagu dan/atau Musik. *Dialogia Iuridica*, 13(2), 001–020. (Indonesia).
- Baity, S. N., & Rakhmawati, C. S. (2025). Harmonisasi Direct Licensing Dan Collective Licensing Atas Performing Rights di Indonesia. *JIPRO: Journal of Intellectual Property*, 193–225.

- Berliana, M., & Silalahi, W. (2025). Hak Cipta Musik Dan Pengaruhnya Terhadap Industri Musik Di Indonesia. *UNSRAH: Jurnal Hukum Keluarga Islam*, Vol. 6(Vol. 6 No. 1 (2025): Januari).
- Blackham, A. (2025). Interrogating New Methods in Socio-Legal Studies: Content Analysis, Case Law and Artificial Intelligence. *Alternative Law Journal*, Vol. 50(2).
- Cancak, M. S., & Priyambodo, M. A. (2026). Legal Hermeneutics: A Study of Legal Interpretation According to Paul Ricoeur in the Context of Constitutional Court Decisions. *Journal of Multidisciplinary Research* 3 (1).
- Dirkareshza, R., Rahayu, M. H., Mardiyati, N., & Putri, A. N. P. (2025). Urgensi Reformulasi Mekanisme Pemungutan Royalti Musik Bagi UMKM Restoran Sebagai Solusi Atas Paradoks Penegakan Hukum Hak Cipta Di Indonesia. *Jurnal BATAVIA*, 2(3), 165–196.
- Furidha, B. W. (2024). Comprehension of the Descriptive Qualitative Research Method: A Critical Assessment of the Literature. *Journal of Multidisciplinary Research*, 1–8.
- Ilham, M. (2026). Penemuan Hukum Berbasis Penalaran Hukum dalam Mewujudkan Kepastian dan Keadilan. *Al-Zayn: Jurnal Ilmu Sosial & Hukum*, 4(1), 2429–2437.
- Kharisma, F., & Riswandi, B. A. (2022). Pelaksanaan Pembayaran Royalti Atas Lagu Dalam Live Performance Kepada Pencipta Lagu Di Kafe Roemah Kesambi Kota Cirebon. *JIPRO: Journal of Intellectual Property*, 5(1).
- Lubis, K. U., & Faslah, R. (2025). Hak Cipta Dalam Industri Musik: Analisis Terhadap Perlindungan dan Pembajakan. *Journal of Business Economics and Management*, 1(4).
- Mitchell, M. (2022). Analyzing the Law Qualitatively. *Qualitative Research Journal*, 23(1), 102–113.
- Natasya, S., & Putra, M. A. P. (2025). Implikasi Hukum Hak Cipta Dalam Pertunjukan Musik: Studi Kasus Somasi Ahmad Dhani Terhadap Once Mekel. *Jurnal Media Akademik (JMA)*, 3(12).
- Nugroho, O. S. (2025). Juridical Review of the Right to Royalty Payments for Songwriters Based on Law Number 28 Of 2014 Concerning Copyright (Case Study of Ari Bias Vs Agnes Monica). *Fox Justi: Jurnal Ilmu Hukum*, 15(02), 494–505.
- Nugroho, O. S., & Setyawati, S. (2025). Event Organizer's Responsibility for Royalty Payments to Songwriters in Music Concerts. *Fox Justi: Jurnal Ilmu Hukum*, 15(03), 1071–1079.
- Nurjanah, T. N. T., & Azizah, S. (2025). Problematika Sistem Royalti di Indonesia: Studi Kasus Agnez Mo dan Implikasi bagi Perlindungan Hak Cipta. *Nexus Yuridis Law Journal*, 1(1).
- Paendong, K., & Taunamang, H. (2022). Kajian Yuridis Wanprestasi Dalam Perikatan Dan Perjanjian Ditinjau Dari Hukum Perdata. *LEX PRIVATUM*, 10(3).
- Paladan, G., & Sawitri, D. A. D. (2025). Penafsiran Kata "Pengguna" Dalam Putusan Pengadilan Niaga Nomor 92/Pdt.Sus-Hki/Hak Cipta/2024/Pn Niaga Jkt.Pst. 3(11).

- Pitasari, D. R. (2025). Aspek Hukum Penyelesaian Sengketa Hak Royalti Antara Pencipta Dengan Penyanyi Dalam Konser Musik Berdasarkan Undang-Undang Nomor 28 Tahun 2014 Tentang Hak Cipta. *Uniera: Jurnal Ilmiah Lintas Ilmu*, 18(2), 77–90.
- Purnamaningrat, I. G. A. I., & Suryana, I. N. (2025). Distribusi Royalti Lagu Dalam Konser Oleh Lembaga Manajemen Kolektif: Siapa Yang Membayar? *Nusantara Hasana Journal*, 5(1), 98–107.
- Purwadi, I. R., Franciska, W., & Hutomo, P. (2025). Kepastian Hukum Pembagian Royalti Bagi Pencipta Lagu Paska Berlakunya Peraturan Nomor 56 Tahun 2021 Tentang Pengelolaan Royalti Hak Cipta Lagu Dan/Atau Musik Oleh Lembaga Manajemen Kolektif Nasional. *Journal of Inovation Research and Knowledge*, 5(1).
- Putri, N. D. (2025). Kajian Yuridis Urgensi Penguatan Kedudukan Masyarakat Hukum Adat dalam Mitigasi Perubahan Iklim di Indonesia. *Journal of Law, Society, and Islamic Civilization*, 13(1), 89–104.
- Rabbani, L. (2023). Peran Lembaga Manajemen Kolektif Nasional Sebagai Pengelola Royalti Hak Cipta Lagu Dan Musik. 5(2).
- Rachman, M. (2022). Pengelolaan Royalti Dari Pencipta Lagu Yang Tidak Terdaftar Di Lembaga Manajemen Kolektif Oleh Lembaga Manajemen Kolektif Nasional. "Dharmasiswa" *Jurnal Program Magister Hukum FHUI*, 2(2).
- Rahmawati, R. (2025). Kontekstualisasi Maqashid Al-Syariah Terhadap Sanksi Pidana Bagi Pelaku Penjiplakan Desain Busana (Analisis Putusan Nomor 1/Pdt.Sus-HKI/2020/PN Niaga Mks): Analisis Hukum Islam Terhadap Pelanggaran Hak Kekayaan Intelektual dalam Desain Busana. *DELICTUM: Jurnal Hukum Pidana Islam*, 4(1), 41–50.
- Rustianto, M. Y., Yestati, A., & Januardy, I. (2025). Legal Review of Government Regulation No. 56 of 2021 on Copyright Royalties Management for Songs and or Music in Broadcasting Media with Focus on Radio. *Journal of Law, Politic and Humanities* 5(6).
- Salmaa, S. N., Amirulloh, M., & Safiranita, T. (2025). Tanggung Jawab Penyanyi sebagai Penampil Karya terhadap Pencipta dalam Komersialisasi Lagu pada Konser Musik yang Diadakan oleh Pihak Ketiga Berdasarkan Undang-Undang Hak Cipta. *Hukum Inovatif: Jurnal Ilmu Hukum Sosial dan Humaniora*, 2(4), 54–65.
- Sukmawati, S. A., Abdussamad, Z., & Muhtar, M. H. (2025). Hak Cipta Musik dan Keadilan Bagi Pencipta. *Journal Evidence of Law*, 4(3), 1578–1590.
- Suwarni, A., & Farida, E. (2025). A Civil Law Perspective on the Music Copyright Dispute: Agnez Mo vs. Ari Bias. *Pena Justisia: Media Komunikasi Dan Kajian Hukum*, 24(1), 5743–5755.
- Tambunan, A. M. P., & Silahahi, W. (2025). Analisis Yuridis terhadap Penggunaan Lagu secara Komersial tanpa Izin Pencipta dalam Perspektif Undang-Undang Hak Cipta. *Jurnal Tana Mana*, 6(1), 340–350.

Books:

- Hanim, L., Pase, A. T., Wiranti, W., Wulandari, E., Hofi, M. A., Cita, H. R., Astanti, D. I., Mukharom, Tolinggar, V. A. S., Amrin, Megayanti, S., & Haryatmo, G. G. (2025). Hukum Perikatan. <https://cveduakademi.com/buku/hukum-perikatan/>
- Nurwati. (2024). *Hak Cipta Karya Musik dan Lagu*. Yogyakarta: Penerbit Kbm Indonesia.
- Setiawan, I. K. O. (2021). *Hukum Perikatan*. Jakarta: Bumi Aksara.

Internet:

- Aditya, N. R., & Damarjati, D. (2025). Akhir Cerita Sengketa Royalti "Bilang Saja" antara Agnez Mo Vs Ari Bias. KOMPAS.com. <https://nasional.kompas.com/read/2025/08/15/06473011/akhir-cerita-sengketa-royalti-bilang-saja-antara-agnez-mo-vs-ari-bias>
- Ginanjari, R. P. A. (2025, February 8). Profil Ari Bias, Komposer yang Gugat Agnez Mo Rp 1,5 Miliar. tempo.co. <https://www.tempo.co/teroka/profil-ari-bias-komposer-yang-gugat-agnez-mo-rp-1-5-miliar-1204564>
- Irsyam, D. (2025). Musik Video Masih Jadi Raja Konten Digital di Indonesia 2025. GoodStats. <https://goodstats.id/article/musik-video-masih-jadi-raja-konten-digital-di-indonesia-audio-streaming-melesat-eoQ3c>
- Kumalasanti, S. R. (2025). Agnez Monica Menang di MA, Tak Harus Bayar Royalti Rp 1,5 Miliar ke Ari Bias. Kompas.id. <https://www.kompas.id/artikel/menang-di-ma-agnes-monica-tak-harus-bayar-ke-ari-bias>
- mediakedaikopi. (2025). Survei KedaiKOPI: Konsumsi Kelas Menengah Bergeser, Gaya Hidup Dipangkas. Kedai Kopi. <https://kedaikopi.co/survei-kedaikopi-konsumsi-kelas-menengah-bergeser-gaya-hidup-dipangkas/>
- Muhamad, N. (2025, September 22). Konser Musik Jadi Pelarian Anak Muda RI dari Penat dan Stres | Pusat Data Ekonomi dan Bisnis Indonesia. <https://databoks.katadata.co.id/media/statistik/68d0df645338f/konser-musik-jadi-pelarian-anak-muda-ri-dari-penat-dan-stres>
- Prasetyo, A. (2025). Mengetahui Alur Perkara HKI dari Putusan Kasasi Agnez Mo vs Ari Bias. hukumonline.com. <https://www.hukumonline.com/berita/a/mengetahui-alur-perkara-hki-dari-putusan-kasasi-agnez-mo-vs-ari-bias-lt689e9e0ed6632/>
- Ridwan, A. (2025, September 22). Ini Frekuensi Warga Indonesia Nonton Konser Musik pada 2025 | Pusat Data Ekonomi dan Bisnis Indonesia. <https://databoks.katadata.co.id/media/statistik/68d0a5f5b7264/ini-frekuensi-warga-indonesia-nonton-konser-musik-pada-2025>
- Rizki, M. J. (2025, February 18). Melihat Kembali Pertimbangan Putusan Agnes Mo vs Ari Bias. hukumonline.com. <https://www.hukumonline.com/berita/a/melihat-kembali-pertimbangan-putusan-agnes-mo-vs-ari-bias-lt67b4693717b3a/>

Tokoh, P. (2024, September 29). Biodata Agnes Monica, Penyanyi Hebat Asal Indonesia. kumparan.com. <https://kumparan.com/profil-tokoh/biodata-agnes-monica-penyanyi-hebat-asal-indonesia-23byYy2RYph>

Regulation:

Indonesian Civil Code (Kitab Undang-Undang Hukum Perdata)

Law No. 28 of 2014 on Copyright

Government Regulation No. 56 of 2021 on Management of Copyright Royalties for Songs and/or Music

Minister of Law Regulation No. 27 of 2025 on Implementing Regulation for Government Regulation No. 56 of 2021 concerning Management of Songs and/or Music Copyright Royalties

Ruling No. 825 K/Pdt.Sus-HKI/Copyright/2025

Ruling No. 92/Pdt.Sus-HKI/Copyright/2024/PN Niaga Jkt. Pst

Thesis:

Awwabi, M. N. (2021). Perlindungan Hukum Terhadap Pemegang Hak Cipta Karya Musik Terkait Dengan Pemenuhan Hak Ekonomi Berupa Royalti. <https://repository.unissula.ac.id/id/eprint/24809>

Firdausah, R. I. (2025). Analisis Yuridis Sengketa Hak Cipta antara Agnez Mo dan Ari Bias Tinjauan Hukum terhadap Pelanggaran dan Penyelesaian Sengketa (Studi Putusan Nomor 92/Pdt.Sus-HKI/Cipta/2024/PN Niaga Jkt.Pst) [Undergraduate, Universitas Muhammadiyah Malang]. <https://eprints.umm.ac.id/id/eprint/20912/>

Herlambang, F. S. (2025). Perlindungan Hukum Hak Cipta Karya Musik Yang Dibawakan Secara Live Untuk Kepentingan Komersil Tanpa Seizin Pencipta [Undergraduate, Universitas Islam Sultan Agung Semarang]. <https://repository.unissula.ac.id/39509/>

Hsb, M. H. (2025). Analisis Putusan Hakim dalam Perkara Nomor 34/Pid. Sus/2022/PN Sbg Tentang Sanksi Narkotika. <http://etd.uinsyahada.ac.id/id/eprint/13233>

Khatintri, C. H. (2025). Pertimbangan Hakim Dalam Memutus Perkara Putusan Kasasi Mahkamah Agung Nomor 854K/Pdt. Sus-HKI/2023 Sebagai Upaya Pemenuhan Hak Royalti Atas Lagu [Universitas Tidar]. https://repositori.untidar.ac.id/index.php?p=show_detail&id=19874&keywords=

Mahfudloh, L. (2025). Ratio Decidendi Hakim Dalam Sengketa Lisensi Lagu Oleh Pelaku Pertunjukan: Putusan Nomor 825 K/PDT.SUS-HKI/2025 [Undergraduate, Universitas Islam Negeri Maulana Malik Ibrahim]. <http://etheses.uin-malang.ac.id/81142/>

- Oktavian, D. D. (2025). Pelindungan Hukum Bagi Kreator Konten Tiktok Terhadap Pencurian Karya Sinematografi Untuk Kepentingan Komersial Serta Mekanisme Pelindungan Hak Cipta Yang Diterapkan Oleh Tiktok. [bachelorThesis, Fakultas Syariah dan Hukum UIN Syarif Hidayatullah Jakarta]. <https://repository.uinjkt.ac.id/dspace/handle/123456789/86080>
- Ramadhani, A. R. (2025). Tinjauan Yuridis Pelanggaran Hak Cipta Lagu (Studi Kasus Pelanggaran Hak Cipta Lagu Ahmad Dhani Oleh Once Mekel) [Undergraduate, Universitas Islam Sultan Agung]. <https://repository.unissula.ac.id/44547/>
- Santoso, R. B. (2025). Analisis Yuridis Terhadap Perlindungan Hak Cipta Seni Musik Yang Dinyanyikan Oleh Penyanyi Profesional (studi Kasus Penyanyi Agnez Mo) [PhD Thesis, Universitas Islam Sultan Agung Semarang]. <https://repository.unissula.ac.id/42212/>
- Svinarky, I. (2023). Rekonstruksi Regulasi Perlindungan Hak Ekonomi Pemilik Hak Pada Karya Cipta Lagu Melalui Manajemen Kolektif Yang Berkeadilan [Doctoral, Universitas Islam Sultan Agung]. <https://repository.unissula.ac.id/30963/>
- Wicaksono, A. P. (2024). Kebutuhan Hukum Terhadap Pengaturan Penyelenggaraan Kegiatan Konser Musik Berdasarkan Asas Kepastian Hukum [Masters, Universitas Muhammadiyah Malang]. <https://eprints.umm.ac.id/id/eprint/8521/>
- Zildjian, A. A. R. (2024). Analisis Yuridis Terhadap Keabsahan Penggunaan Klausula Overmacht Dalam Perjanjian Waralaba [Undergraduate, Universitas Islam Sultan Agung Semarang]. <https://repository.unissula.ac.id/37885/>
- Zuhdi, I. (2023). Perlindungan Hak Ekonomi Dalam UU Hak Cipta & Pp 56/2021 Tentang Pengelolaan Royalti Hak Cipta Lagu Dan/Atau Musik Dalam Perspektif Maqashid Syariah [Fakultas Syariah Dan Hukum Universitas Islam Negeri Syarif Hidayatullah Jakarta]. <https://repository.uinjkt.ac.id/dspace/handle/123456789/70805>