

From Imprisonment to Community Service: Individualized Sentencing in Animal Cruelty Cases

Indah Permata Sari¹⁾ & Shinta Ayu Purnamawati²⁾

¹⁾Faculty of Law, Universitas Muhammadiyah Malang, Indonesia, Email: indahhhyyy03@gmail.com

²⁾Faculty of Law, Universitas Muhammadiyah Malang, Indonesia, E-mail: shintaayu.lecturer@gmail.com

Abstract. *This study aimed to analyze the application of Article 337 of the National Criminal Code and to evaluate how individualized sentencing was reflected in the selection of community service for animal cruelty. The research used a normative legal method with statutory, case, and conceptual approaches. Primary legal materials consisted of the relevant legislation and the court decision, while secondary legal materials consisted of books, journal articles, institutional reports, and related research. The materials were examined through qualitative content analysis by comparing the proven facts, the prosecutor's sentencing request, the offender's circumstances, the court's reasoning, and the sanction imposed. The novelty of the study lay in examining one of the earliest applications of Article 337 after the National Criminal Code entered into force, with particular attention to the relationship between individualized sentencing and community service. The study found that the court imposed two months' imprisonment as the basis for conversion into 20 hours of community service consisting of educational sessions on the prevention of animal cruelty. The sanction reflected corrective, educational, rehabilitative, and socially beneficial objectives and was directly related to the offense. However, the decision still required clearer and measurable reasoning concerning the harm suffered by the animal, the causal relationship between the conduct and the reported death, the basis for determining the duration of community service, the offender's suitability for the assigned activity, and the supervision and evaluation mechanism. The study concluded that community service can support individualized and proportionate sentencing when it is supported by adequate evidence, transparent judicial reasoning, and structured implementation.*

Keywords: *Animal; Community; Cruelty; Sentencing; Welfare.*

1. Introduction

Animal cruelty in Indonesia is no longer confined to incidents concealed within households, farms, or commercial activities. The growth of digital media has transformed acts of violence against animals into content that can be recorded, distributed, repeatedly viewed, and monetized. In 2024, 83,022 links containing animal cruelty were identified across more than eleven digital platforms; more than 80,000 were reported by members of the public, and 87.5 percent of the reports concerned content distributed

through Facebook (Asia for Animals Coalition, 2025). An earlier monitoring study covering July 2020 to August 2021 identified 5,480 animal cruelty videos from various countries, of which 1,626 videos, or approximately 29.7 percent, originated from Indonesia (Social Media Animal Cruelty Coalition, 2021). These figures are not official crime statistics because not all circulating content is reported to or processed by law-enforcement authorities. Even so, they illustrate the extensive dissemination and normalization of animal cruelty in digital spaces and reinforce the need for an effective legal response.

The legal response to animal cruelty entered a new phase when Law Number 1 of 2023 concerning the Criminal Code came into force on 2 January 2026. Article 337 paragraph (1) criminalizes a person who excessively or without a legitimate purpose causes pain or injury to an animal or harms its health, including by engaging in sexual acts with an animal. The offense is punishable by imprisonment for up to one year or a category II fine of up to IDR 10,000,000.00. Where the conduct causes the animal to remain ill for more than one week, become disabled, sustain serious injury, or die, paragraph (2) increases the maximum penalty to one year and six months' imprisonment or a category III fine of IDR 50,000,000.00. The provision therefore expands the former Criminal Code by increasing maximum penalties and recognizing more serious consequences for animals. Recent scholarship similarly identifies the National Criminal Code as an important development in animal-protection policy, while noting that enforcement and regulatory coordination remain essential (Samara et al., 2026).

Increasing statutory penalties does not automatically produce consistent legal protection. A criminal prohibition acquires practical significance only when investigators correctly classify the conduct, public prosecutors formulate appropriate charges and sentencing submissions, and judges determine the type and severity of the sentence on the basis of facts proven at trial. Animal protection in Indonesia remains dispersed across criminal law, animal husbandry and health legislation, and implementing regulations, which can complicate enforcement (Setiabudhi et al., 2023). Risnanda (2023) further emphasizes the need for clearer legal classification of physical, psychological, and sexual forms of animal abuse. Prasetyo et al. (2023) discuss the use of criminal sanctions against animal abuse, while Safitri et al. (2024) show that legal accountability must also account for changes between the former and current Criminal Codes. These studies indicate that the central problem is not merely the availability of a criminal norm, but the consistency with which legal actors connect the proven conduct, its consequences, and the appropriate sanction.

The individualization of sentencing treats punishment as a process that is not based solely on the statutory definition of an offense but also considers the concrete characteristics of the conduct and the offender. A judge is expected to assess culpability, motive, manner of commission, consequences, prior history, post-offense conduct, personal circumstances, and the offender's prospects for behavioral reform. This approach allows the court to select a sanction that is proportionate to the wrongdoing while remaining consistent with the purposes of punishment. The sentencing guidelines in the National Criminal Code therefore move judicial reasoning beyond a purely numerical comparison of penalties and toward a more contextual assessment of the offender and the offense (Aripkiah et al., 2026). Community service is particularly relevant within this framework because it is designed as a non-custodial sanction that can combine accountability, rehabilitation, and public benefit (Triatmojo et al., 2026).

Judicial discretion, however, must remain supported by transparent legal reasons so that individualization does not become arbitrary leniency.

Previous research leaves a specific gap concerning how individualized sentencing is operationalized in animal cruelty cases after the current Criminal Code took effect. Setiawati et al. (2024) found that law enforcement against animal cruelty remained suboptimal because of low public reporting, limited legal awareness, weak interinstitutional coordination, and sanctions perceived as lenient, but their study did not examine the selection of a particular sanction in light of an offender's individual circumstances. Pattiasina et al. (2026) identified an imbalance between the cruelty of conduct and sanctions imposed in several decisions, yet their analysis focused on animal-rights principles rather than individualized sentencing under Article 337. Prawitasari et al. (2023) analyzed judicial reasoning in Decision Number 207/Pid.Sus/2022/PN.Blit under the former Criminal Code. Dalillah and Munandar (2025) likewise criticized the leniency of sentencing in Decision Number 72/Pid.C/2023/PN.Pdg, while Abidin and Ahmad (2026) highlighted evidentiary and legal-awareness problems at the investigative stage. Collectively, these studies do not explain the relationship among proof of consequences, offender characteristics, the prosecutor's sentencing request, judicial reasoning, and the selection of community service during the initial application of Article 337.

The novelty of this study lies in its analysis of individualized sentencing in one of the earliest applications of Article 337 to an animal cruelty case after the National Criminal Code entered into force. In the decision examined, the court determined a two-month term of imprisonment but converted it into 20 hours of community service consisting of educational sessions on the prevention of animal cruelty. The analysis therefore does not stop at whether the defendant was legally liable. It examines how the facts of the case, the offender's characteristics, the prosecutor's sentencing request, the court's stated reasons, and the form of community service were connected. The sanction is then assessed against proportionality, the purposes of punishment, rehabilitation, and the requirements governing community service. This focus distinguishes the study from earlier work centered primarily on the sufficiency of criminal penalties or the formal application of offense elements.

Accordingly, this study aimed to analyze the application of Article 337 of the National Criminal Code in the animal cruelty case, to examine the basis of the court's individualized sentencing considerations, and to assess whether the community service sentence was proportionate and consistent with the purposes of punishment. The study also aimed to identify evidentiary, formulation, supervision, and implementation issues that should be addressed so that community service can function as a measurable, rehabilitative, and legally accountable sanction in comparable animal cruelty cases.

2. Research Methods

This study was normative legal research with a qualitative orientation and employed statutory, case, and conceptual approaches. The research subject was the Blora District Court decision concerning an animal cruelty offense prosecuted under Article 337 of the National Criminal Code. The statutory approach was used to examine Article 337 together with the provisions governing community service and animal welfare. The case approach was used to examine the facts, charge, prosecutor's sentencing request,

judicial reasoning, and operative order in the selected decision. The conceptual approach was used to analyze individualized sentencing, proportionality, the purposes of punishment, rehabilitation, and the legal position of community service. Because this was normative legal research, it did not employ dependent or independent variables; therefore, operational definitions of variables and measurement instruments were not applicable.

The primary legal materials consisted of legislation and court decisions, while the secondary legal materials included books, journal articles, institutional reports, and relevant research findings. The decision was identified through the Supreme Court Decision Directory, the Case Tracking Information System, and official court websites by using the keywords "animal cruelty," "violence against animals," "causing pain to animals," and "Article 337 of the Criminal Code." The decision was selected because it involved an early application of Article 337, contained a community service sentence, and provided sufficient information to compare the conduct, the offender's circumstances, the prosecutor's sentencing request, the court's reasoning, and the sanction imposed. The analytical focus used for the decision is presented in Table 1.

Table 1. Focus of the Decision Analysis	
Aspect	Elements analyzed
Facts of the case	Nature of the conduct, method of abuse, motive, and consequences for the animal
Offender characteristics	Age, background, relationship with the animal, attitude, and prior conduct
Legal basis	Application of Article 337 of the National Criminal Code and the provisions on community service
Prosecutor's sentencing request	Type and severity of the proposed sentence and the reasons supporting it
Court's reasoning	Aggravating and mitigating circumstances and the objectives to be achieved
Operative part of the judgment	Form, duration, location, and implementation mechanism of community service
Legal assessment	Individualized sentencing, proportionality, rehabilitation, and animal protection

The legal materials were analyzed through qualitative content analysis. Relevant portions of the decision and supporting legal materials were read, coded, classified, compared, and interpreted according to the analytical aspects set out in Table 1. The analysis focused on the relationship among the proven facts, the reported consequences for the animal, the offender's circumstances, the prosecutor's sentencing request, the court's aggravating and mitigating considerations, and the form and duration of community service. The findings were then assessed against the principles of individualized sentencing, proportionality, rehabilitation, the purposes of punishment, and animal welfare protection.

3. Results and Discussion

3.1. Application of Article 337 in the Animal Cruelty Case

The Blora animal cruelty case began when Pujianto kicked a cat named Mintel at Kridosono Field, Blora Regency, on 25 January 2026. The act was recorded and subsequently distributed through social media, attracting public attention and concern from animal protection communities. The cat was reported to have died two days after

the kicking incident. Following investigation and prosecution, the defendant was charged solely under Article 337 paragraph (1)(a) of Law Number 1 of 2023 concerning the Criminal Code. The public prosecutor sought a fine of IDR 5,000,000.00. If the fine was not paid and the defendant's property could not be seized to satisfy it, the prosecutor requested three months' imprisonment in substitution.

The panel of judges found the defendant legally and convincingly guilty of animal cruelty. The court imposed two months' imprisonment but ordered that it need not be served and instead converted the sentence into 20 hours of community service. The community service consisted of legal education and public outreach on the prohibition of animal cruelty at ten schools in Blora Regency, with two hours of instruction at each school. If the offender failed, without a lawful excuse, to perform all or part of the obligation, he would be required to serve the two-month term of imprisonment together with an additional one-month term.

Table 2. Principal Findings in the Blora Animal Cruelty Case

Aspect	Finding
Offender	Pujianto bin Dirgo Martono, a retired civil servant
Animal victim	A cat named Mintel
Conduct	Kicking a cat that was being walked on a leash
Date and place	25 January 2026, Kridosono Field, Blora Regency
Reported consequence	The cat died two days after the incident
Legal basis of the charge	Article 337 paragraph (1)(a) of the National Criminal Code
Prosecutor's sentencing request	A fine of IDR 5,000,000.00, with three months' substitute imprisonment
Court's sentence	Two months' imprisonment converted into 20 hours of community service
Form of community service	Educational sessions on the prevention of animal cruelty at ten schools
Supervision	The public prosecutor, with the involvement of an animal protection community
Consequence of non-compliance	Service of the two-month term of imprisonment and an additional one-month term

Article 337 paragraph (1)(a) of the National Criminal Code contains three principal elements: the subject "any person"; the act of causing pain or injury to an animal or harming its health; and the circumstance that the act is committed excessively or without a legitimate purpose. Kicking the cat satisfied the *actus reus* because it was a positive act that caused pain. The conduct also lacked any justifiable purpose, such as medical treatment, self-defense against an animal attack, disease control, or another legally recognized interest. The video recording, the leash used to walk the cat, screenshots of the social-media post, and the defendant's clothing and shoes strengthened the evidentiary link between the defendant and the charged conduct. This finding demonstrates that Article 337 does not require a recurring pattern of violence. A single deliberate act that causes pain to an animal without a legitimate purpose is sufficient to satisfy the elements of the offense.

The principal issue in applying Article 337 arises from the report that Mintel died two days after being kicked, while the public prosecutor relied only on Article 337 paragraph (1), rather than the aggravated form in paragraph (2). Under the *conditio sine qua non* theory (Lienarto, 2016), the defendant's kick may be regarded as a cause if the death would not have occurred but for that conduct. This theory, however, must be limited by

the doctrine of adequate causation, which asks whether, in light of ordinary experience and the concrete circumstances, the kick was reasonably capable of causing death.

The chronology alone was insufficient to establish causation without a veterinary examination addressing the location of the impact, the nature of the injuries, the animal's condition before the incident, and the cause of death. The absence of a disclosed veterinary medico-legal report or post-mortem examination meant that the causal link between the kick and the reported death could not be established with the level of evidentiary certainty needed to justify the aggravated legal consequence in Article 337 paragraph (2). This evidentiary gap is legally significant because the classification of the offense and the proportionality of the sentence depend on whether the reported death was proven as a consequence of the defendant's conduct, rather than merely occurring after it.

The use of a single charge under Article 337 paragraph (1) also restricted the court's ability to determine the proper legal classification of the offense. Article 232 paragraph (3) of the Criminal Procedure Code requires judicial deliberation to be based on the indictment and on matters proven at trial. Consequently, even if Mintel's death emerged during the proceedings, the court could not convict the defendant under Article 337 paragraph (2) unless that provision had been included in the indictment. This situation is often associated with the prohibition of *ultra petita*, although the more accurate criminal-procedure principle is that the court is bound by the limits of the indictment. The prosecutor's decision not to include paragraph (2), whether as an alternative or subsidiary charge, meant that the animal's death could not be used to elevate the classification of the offense. The Blora case demonstrates that the effectiveness of Article 337 paragraph (2) depends heavily on the readiness of investigators and prosecutors to obtain veterinary forensic evidence and formulate charges that anticipate the consequences of the conduct.

3.2. Individualized Sentencing in the Court's Reasoning

Individualized sentencing is evident in the difference between the sanction sought by the public prosecutor and the sentence imposed by the court. The prosecutor requested a fine of IDR 5,000,000.00, whereas the court selected community service after initially determining a two-month term of imprisonment. This was not merely a change in the formal type of sanction. The court directed the punishment toward an activity directly connected to the defendant's conduct, namely educational sessions on the prevention of animal cruelty. The sentence did not end with the payment of money but required the offender to communicate the very norm that he had previously violated.

This choice reflects the sentencing guidelines contained in Article 54 of the National Criminal Code. In imposing a sentence, a judge must consider the form of culpability, motive and purpose, state of mind, manner of commission, post-offense conduct, personal history, social and economic circumstances, the effect of the sentence on the offender's future, and the legal and justice values living in society. These guidelines permit the court to adjust the sentence to the offender's concrete circumstances, but that discretion is not unlimited. Every sentencing choice must bear a rational relationship to the degree of culpability, the harm caused, the need for correction, and the protection of society.

The selection of community service may be understood as an effort to balance the offender's accountability with his personal characteristics. The defendant was an elderly, retired civil servant who accepted the court's decision. A short term of imprisonment risks inflicting suffering without producing meaningful behavioral change. By contrast, school-based educational sessions make use of the offender's social experience and communication skills to generate a public benefit. Individualization in this case does not remove the condemnatory character of punishment because the offender remains convicted, is subjected to time constraints, must attend several locations, and is placed under prosecutorial supervision.

These findings differ from Setiawati et al. (2024), who emphasized the need to strengthen law enforcement because of the limited effectiveness of responses to animal cruelty. Pattiasina et al. (2026) likewise found that earlier decisions tended to employ sanctions that were disproportionate to the cruelty of the conduct, while Prawitasari et al. (2023) focused more narrowly on the proper application of offense elements under the former Criminal Code. The present case represents a different development because the court considered not only the severity of the sanction but also the relationship between the form of punishment and the nature of the violation. This distinction is analytically important: individualized sentencing is not demonstrated merely by imposing a lighter sanction, but by showing a reasoned connection among culpability, personal circumstances, the harm proven at trial, the purpose of punishment, and the obligations imposed on the offender.

Individualized sentencing must not be equated with leniency toward an offender. A quantitatively light sentence is not necessarily weak where it imposes relevant, enforceable obligations and generates social accountability. Conversely, a short term of imprisonment is not necessarily effective if it merely separates the offender from society without addressing the causes of the conduct. Scholarship on the sentencing guidelines of the National Criminal Code likewise identifies a shift from rigid, numerically driven punishment toward sentencing that emphasizes proportionality, individualization, and substantive justice.

Although the decision reflects a progressive orientation, the considerations supporting individualization must be stated transparently in the judgment. The court should explain why community service was selected, whether the activity matched the defendant's abilities, the basis for determining 20 hours, and the reasons for selecting ten schools as implementation sites. Such an explanation is necessary to prevent community service from appearing to be a subjectively granted concession. Available reports of the proceedings do not fully disclose how the court assessed the defendant's age, health condition, social history, admission, remorse, and capacity to perform the work. The official decision remains necessary to determine whether all of the Article 54 guidelines and Article 85 requirements were adequately considered.

3.3. Community Service as a Proportionate Sentencing Measure

Article 65 of the National Criminal Code classifies community service as a principal punishment alongside imprisonment, confinement, supervision, and fines. Article 85 provides that community service may be imposed for an offense punishable by imprisonment of less than five years where the court intends to impose no more than six months' imprisonment or a fine not exceeding category II. Article 337 paragraph (1)

carries a maximum penalty of one year's imprisonment or a category II fine. The two-month term determined by the panel was also below the six-month threshold. Considering both the statutory maximum and the sentence selected, the Blora case satisfied the basic requirements for imposing community service.

The duration of 20 hours also fell within the range prescribed by Article 85, namely a minimum of eight hours and a maximum of 240 hours for an adult offender. Two hours of service at each school did not exceed the daily limit of eight hours. Schools may serve as locations for community service because the activity may be performed at social institutions, public facilities, or educational institutions. The selection of ten schools also indicates that the sanction was designed as a concrete activity rather than a merely symbolic order.

The correspondence between the conduct and the content of the sentence is the principal strength of the decision. The defendant was not ordered to undertake unrelated public work but was required to present material on the prohibition of animal cruelty. This arrangement serves three functions. First, it confronts the offender with the norm he violated and thereby creates an opportunity for reflection on the wrongdoing. Second, it provides the public with education on animal protection. Third, it communicates that violence against animals is a criminal offense, rather than a trivial matter concerning only the animal's owner.

Community service also avoids the unproductive use of short-term imprisonment. Albab et al. (2025) explain that community service can preserve the offender's relationships with family and society, reduce stigma, and provide social benefits during execution. Their study also emphasizes that effectiveness depends on institutional readiness, clarity regarding the activities to be performed, and coordination among implementing bodies. These considerations are consistent with the execution structure reported in the present case, which involved the prosecutor's office, schools, the Correctional Center, and an animal protection community. The comparison indicates that the legal validity of a community service order is only one dimension of effectiveness; the sanction must also be supported by a clear activity design, competent guidance, supervision, and an evaluation mechanism capable of assessing whether the intended rehabilitative and social objectives were achieved.

The thematic connection between the educational sessions and the offense does not, by itself, establish the suitability of the activity. An offender who has just been convicted of animal cruelty may lack both the pedagogical competence and the moral legitimacy to serve as the principal educator on preventing violence against animals before schoolchildren. The activity may have rehabilitative value if the offender is positioned as a person reflecting on his wrongdoing and its legal consequences, rather than as the primary expert on animal welfare. The material should be prepared and delivered together with a veterinarian, educator, probation officer, or animal protection organization. Other forms of community service, such as cleaning shelter facilities, preparing feed, or caring for animals under professional supervision, may offer more restorative alternatives because they directly confront the offender with animals' needs and vulnerability. Where the offender's age or physical condition precludes such work, educational sessions may remain appropriate provided that they are accompanied by supervision and a suitability assessment.

The clause providing that failure to complete community service would result in the offender serving two months' imprisonment plus an additional month must also be assessed under Article 85 paragraph (7) of the National Criminal Code. That provision permits only the repetition of all or part of the community service, execution of all or part of the substituted term of imprisonment, or payment of the fine or substitute penalty. It does not expressly authorize the imposition of a new term of imprisonment in addition to the original sentence. The additional month may therefore raise a legality concern if the official judgment uses the same formulation reported in the media. Article 85 paragraph (8) also distinguishes supervision by the prosecutor from guidance provided by a probation officer. Publications concerning implementation refer to the involvement of the Pati Correctional Center, so the criticism is not that the Correctional Center was absent, but that the form of assessment, guidance plan, monitoring of behavioral change, and final evaluation remain unclear. Completion of the 20 hours should not be measured solely by attendance but also by the achievement of rehabilitative objectives and the activity's social benefits.

From the standpoint of proportionality, 20 hours is close to the statutory minimum of eight hours. The duration may be adequate if the conduct is characterized as a single spontaneous act, the defendant has no history of animal cruelty, and the cat's death is not causally established. It would, however, appear excessively lenient if the animal's suffering and death were proven to have resulted directly from the conduct. This issue again demonstrates the importance of medical evidence and a detailed explanation of the court's reasoning. Proportionality cannot be determined solely by public reaction or reported consequences but must rest on facts proven at trial.

The reported operative order stated that the defendant was sentenced to two months' imprisonment, which need not be served and was converted into 20 hours of community service. This construction may obscure the status of community service because Article 65 paragraph (1)(e) of the National Criminal Code classifies it as a principal punishment, not merely as a method of implementing a suspended prison sentence under the former Criminal Code. Article 85 paragraph (9) does require the court to specify the term of imprisonment or fine that it initially intended to impose as the basis for conversion, but the operative order should nevertheless identify the sentence expressly as community service. The wording attributed to the court therefore suggests that use of the new instrument remains influenced by the older assumption that imprisonment is the primary punishment and community service merely its substitute.

A more accurate formulation would impose 20 hours of community service as the principal sentence, while stating that the two-month term of imprisonment was used as the basis for conversion and may be executed if the community service obligation is not fulfilled. This formulation would better reflect Articles 65 and 85, which position community service as a principal punishment and an alternative to short-term imprisonment or a minor fine.

Dalillah and Munandar (2025) previously concluded that sentences in animal cruelty cases tended to be excessively lenient and insufficiently deterrent. The present findings offer a different perspective: sentencing effectiveness is determined not only by the length of imprisonment or the amount of a fine, but also by the correspondence between the sanction and the conduct, the measurability of the obligations, the quality of supervision, and the capacity of the sentence to influence behavior. Community service

in the present case reflects individualized sentencing because it was adjusted to the offender's circumstances and connected to animal protection. Its legitimacy, however, depends on transparent reasons explaining why the activity and duration were selected and on structured implementation that can demonstrate compliance and behavioral change.

Overall, the principal finding is that the decision reflects a shift from predominantly retributive punishment toward corrective, rehabilitative, and socially beneficial accountability through community service. The principal strength of the sentencing approach is the direct thematic relationship between the offense and the educational activity imposed on the offender. Its principal weaknesses are the absence of fully disclosed reasoning on the offender's personal factors, the basis for determining 20 hours of service, the offender's suitability to act in an educational setting, and proof of the causal relationship between the kick and the animal's reported death. The decision may therefore serve as an initial reference for similar cases only if individualized sentencing is supported by measurable legal reasons, reliable evidence, and structured supervision rather than being used to minimize animal suffering.

4. Conclusion

The study concluded that Article 337 paragraph (1)(a) was applicable because the proven conduct involved intentionally causing pain to an animal without a legitimate purpose, but the absence of disclosed veterinary forensic evidence prevented a reliable causal finding that the kick caused the animal's reported death and limited the basis for applying the aggravated consequence in paragraph (2). Individualized sentencing was reflected in the court's decision to convert a two-month term of imprisonment into 20 hours of community service directly related to animal-cruelty prevention. The sanction was compatible in principle with corrective, rehabilitative, and socially beneficial purposes, yet its proportionality and legitimacy depended on clearer reasoning concerning the offender's circumstances, the duration and form of the activity, the offender's suitability for an educational role, and the consequences of non-compliance. Future application should therefore treat community service expressly as a principal punishment, support sentencing with adequate veterinary evidence, and ensure prosecutorial supervision, Correctional Center guidance, and measurable evaluation of compliance and behavioral change.

5. References

Journal:

- Abidin, N. W. S. R., & Ahmad, G. A. (2026). Implementation of Article 302 of the Criminal Code about animal abuse: Case study at Surabaya Metropolitan Police. *Indonesian Journal of Contemporary Law*, 3(3).
- Albab, W. U., Safitri, M. N., & Insyaniyah, I. (2025). Kesiapan lembaga pelaksana dan bentuk implementasi pidana kerja sosial di Provinsi Daerah Istimewa Yogyakarta. *Indonesian Journal of Criminal Law and Criminology*, 6(2), 58–69. <https://doi.org/10.18196/ijclc.v6i2.25968>
- Aripkiah, N., Maulana, M. R., & Sudarsana, I. K. (2026). Implikasi yuridis pedoman pemidanaan KUHP Nasional terhadap eksistensi ketentuan pidana minimal khusus.

- Dalillah, V., & Munandar, S. (2025). Analysis of the criminal act of animal abuse: Study of Decision Number 72/Pid.C/2023/PN.Pdg. DE'RECHTSSTAAT, 117–127.
- Lienarto, L. (2016). Penerapan asas *conditio sine qua non* dalam tindak pidana di Indonesia. *Lex Crimen*, 5(6).
- Pattiasina, M. C., Angelia, S., & Frans, M. P. (2026). Animal protection in Indonesia: An evaluation of law enforcement based on the principles of the Universal Declaration of Animal Rights. *Bacarita Law Journal*, 6(2), 176–183.
<https://doi.org/10.30598/bacarita.v6i2.22795>
- Prasetyo, F. A., Sepud, I. M., & Widyantera, I. M. M. (2023). Sanksi pidana terhadap pelaku tindak pidana penganiayaan hewan. *Jurnal Analogi Hukum*, 5(3), 276–280.
- Prawitasari, N. Y., Manalu, H., & Riyanto. (2023). Analisis yuridis tindak pidana penganiayaan terhadap hewan: Studi kasus Putusan Nomor 207/Pid.Sus/2022/PN.Blt. *Cakrawala Repositori IMWI*, 6(1), 484–495.
<https://doi.org/10.52851/cakrawala.v6i1.138>
- Risnanda, A. D. (2023). Perlindungan hukum dalam klasifikasi bentuk kekerasan terhadap hewan di Indonesia. *Res Nullius Law Journal*, 5(2), 123–134.
- Safitri, A., Rahman, A., & Djanggih, H. (2024). Pertanggungjawaban pidana terhadap pelaku tindak pidana pembunuhan hewan: Studi perbandingan KUHP lama dan KUHP baru. *Journal of Lex Theory*, 5(1), 38–55.
- Samara, M. R., Pujiyono, Cahyaningtyas, I., Susatyo, F. A., & Kristanto, K. (2026). Criminal policy on criminal acts against animals (animal abuse) based on Pancasila justice in Indonesia. *Veredas do Direito*, 23(7), e235809.
- Setiabudhi, D. O., Irwansyah, & Yunus, A. (2023). Internalizing animal welfare norms: Legal frameworks for protecting animals from mistreatment. *Fiat Justisia: Jurnal Ilmu Hukum*, 17(4), 299–310.
- Setiawati, D., Hidayat, S., Akhmaddhian, S., & Budiman, H. (2024). Enforcing the law against animal cruelty perpetrators: The Animal Husbandry and Veterinary Health Act. *Unifikasi: Jurnal Ilmu Hukum*, 11(2), 144–155.
<https://doi.org/10.25134/unifikasi.v11i02.774>
- Susanti, C., Sukardi, E., & Pasaribu, D. (2023). Legal protection of pets from threats of violent criminal acts and neglect by their owners. *Law Review*, 23(2), 155–171.
- Triatmojo, A. N., Wijaya, A., & Dewi, Y. F. (2026). Pidana kerja sosial sebagai alternatif pemidanaan dalam KUHP baru. *Al-Zayn: Jurnal Ilmu Sosial dan Hukum*, 4(2), 2837–2848. <https://doi.org/10.61104/alz.v4i2.4805>

Books:

- Krippendorff, K. (2018). *Content analysis: An introduction to its methodology* (4th ed.). SAGE Publications.
- Marzuki, P. M. (2017). *Penelitian hukum (Edisi revisi)*. Kencana.

Internet:

Gunawan. (2026, May 14). Terdakwa penandang kucing di Blora dituntut denda Rp5 juta. ANTARA Jateng.

Jamil, A. N. (2026, June 3). Pensiunan ASN Blora penandang kucing hingga mati divonis kerja sosial 20 jam. detikJateng.

Kejaksaan Negeri Blora. (2026, July 16). Jaksa masuk sekolah SMP Negeri 4 Blora dirangkaikan dengan pelaksanaan putusan pengadilan terhadap Sdr. Pujiyanto.

Kejaksaan Negeri Blora. (2026, March 11). Kegiatan tahap 2 perkara penganiayaan hewan Pasal 337 ayat (1) huruf a KUHPidana terdakwa PJN.

Asia for Animals Coalition. (2025, October 16). Cruelty for clicks: The shocking scale of animal abuse on social media.

Social Media Animal Cruelty Coalition. (2021). Making money from misery: How social media giants profit from animal abuse. Asia for Animals Coalition.

Regulation:

Republic of Indonesia. (2023). Law Number 1 of 2023 concerning the Criminal Code. State Gazette of the Republic of Indonesia No. 1 of 2023, Supplement to the State Gazette No. 6842.