

## Law Enforcement and Religious Freedom: A Case Study of the Dissolution of Worship Activities in Sukabumi

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### ABSTRACT

Religious freedom in Indonesia is a fundamental right protected by the Constitution, human rights legislation, and international legal instruments. This study examined the enforcement of law in the dissolution of worship activities in Sukabumi and assessed the tension between constitutional protection of religious freedom and claims of public order. A normative juridical method was employed through statutory and conceptual approaches, supported by secondary legal materials and factual information concerning the Sukabumi case. The analysis showed that the legal framework formally protects freedom of religion and belief, but its implementation remains vulnerable to inconsistent legal interpretation, majority pressure, weak preventive protection against intolerance, and administrative requirements that may create disproportionate barriers for minority groups. The Sukabumi case also demonstrated the importance of separating criminal liability for property damage from social narratives concerning religion. The study concluded that regulatory harmonization, rights-oriented law enforcement, stronger judicial consistency, inclusive administrative reform, and sustained human rights education are necessary to protect religious freedom while maintaining public order.



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## INTRODUCTION

Freedom of religion and belief occupies a central position in Indonesia's constitutional order. Article 28E paragraph (1) and Article 29 paragraph (2) of the 1945 Constitution affirm the freedom of every person to embrace a religion and to worship according to that religion or belief. These guarantees establish a constitutional obligation for the state not merely to refrain from unjustified interference but also to create legal conditions in which citizens can exercise religious freedom safely. In a plural society, the effectiveness of this protection is tested most clearly when religious practice becomes the object of social pressure, administrative dispute, or collective action. The legal problem is therefore not limited to whether rights have been formally recognized; it also concerns whether public authorities can translate constitutional guarantees into consistent protection in concrete situations.

The gap between normative protection and practical implementation remains visible in a number of disputes involving religious activities. Social resistance is sometimes framed as a matter of public order, local consent, administrative authorization, or the status of a place used for worship. Such framing creates a difficult legal intersection. On the one hand, government authorities have responsibilities to maintain order and prevent conflict. On the other hand, public-order considerations cannot be allowed to function as an automatic justification for weakening constitutional rights or exposing minority groups to intimidation. This tension makes law enforcement a decisive element in determining whether constitutional guarantees have substantive meaning in everyday life.

The dissolution of religious activities and the destruction of property in Tangkil Village, Cidahu, Sukabumi, in June 2025 provide a concrete context for examining this problem. The incident developed from public assumptions that a house or villa was being used for Christian worship. According to the factual reports cited in this study, law-enforcement authorities initially named seven suspects and later added another suspect in connection with damage to the property. The criminal process continued despite mediation and compensation because the destruction of property was treated as a criminal offense. The court ultimately imposed five-month prison sentences on the defendants and

emphasized that the case concerned property destruction rather than a judicial determination about religious doctrine or the legitimacy of a religious group (Putra, 2025; Alamsyah, 2025; Usman, 2025).

This factual sequence is significant because it reveals two analytical layers that should not be conflated. The first concerns criminal accountability for acts of destruction and collective violence. The second concerns the broader constitutional vulnerability created when rumors or social objections concerning religious activities become the background to coercive action. Treating the criminal offense objectively is necessary to preserve legal certainty and equality before the law. At the same time, a purely criminal-law characterization may be insufficient if the wider circumstances indicate that the victims' ability to conduct religious activities was affected by social pressure. A complete legal analysis must therefore assess both the immediate offense and the structural conditions that allow intolerance or discriminatory pressure to interfere with the exercise of constitutional rights.

Previous studies have examined several dimensions of the relationship between constitutional guarantees, political law, and religious freedom. Amer et al. (2024) describe the continuing tension between constitutional recognition and political-legal practice in Indonesia, emphasizing that inconsistent implementation can generate social conflict. Sanjaya and Rahim (2024) analyze the role of the Constitutional Court and identify different tendencies in judicial reasoning, including more activist protection in some contexts and restraint in others. Their analysis suggests that the quality of rights protection may depend substantially on the legal framing of the dispute. Haidarrani et al. (2024) further discuss discrimination affecting religious minorities, while Hanyfah et al. (2024) relate legal protection to the philosophical foundations of Pancasila and the Indonesian rule-of-law concept.

Recent scholarship also points to the importance of a coherent legal framework for recognizing religion and belief. Bimasakti (2025) emphasizes the need to align national arrangements with inclusive protection of religion and belief. These studies provide an important foundation, but they largely address religious freedom at the level of constitutional doctrine, political law, minority protection, or regulatory structure. They do not fully explain how those normative debates operate when a specific local incident involves criminal damage, community pressure, mediation by public authorities, and questions about whether a location is being used for worship. The Sukabumi case therefore offers a useful legal setting for connecting abstract constitutional guarantees with the practical choices made by law-enforcement institutions.

The novelty of this study lies in its integrated normative analysis of the Sukabumi incident as a concrete law-enforcement problem. Rather than treating the event only as a criminal case or only as an example of religious intolerance, this article places the incident at the intersection of constitutional law, human rights law, administrative regulation, and law-enforcement practice. The analysis focuses on how the legal system should respond when an offense against property occurs within a social setting shaped by perceptions about religious activity. This perspective makes it possible to distinguish the criminal accountability of perpetrators from the state's broader positive responsibility to ensure that the exercise of religious freedom is not effectively determined by majority pressure or informal coercion.

The study is guided by three interrelated questions. First, how is freedom of religion and belief regulated within Indonesian constitutional, statutory, and international legal frameworks? Second, what law-enforcement problems are revealed by the Sukabumi conflict when religious freedom, public order, criminal accountability, and administrative considerations intersect? Third, what legal measures can strengthen the protection of religious freedom while preserving legitimate public-order objectives? These questions are designed to move the analysis from the identification of norms to the evaluation of implementation and, finally, to the formulation of normative improvements.

Academically, the study contributes to the development of constitutional and human rights scholarship by showing how normative guarantees are tested through local law-enforcement practice. The article also contributes to the literature on the relationship between formal legal rules and social realities in plural communities. Practically, the analysis is intended to provide a structured basis for improving judicial consistency, law-enforcement neutrality, administrative policy, and preventive protection. The central argument is that religious freedom will remain fragile if the state relies solely on constitutional declarations without ensuring that police, local government, courts, and administrative institutions apply those guarantees in a coherent and non-discriminatory manner.

## RESEARCH METHOD

This study used a normative juridical research design. Normative legal research examines law as a system of norms, principles, doctrines, and legal rules, while using secondary materials to evaluate the meaning, coherence, and application of those norms. The method was selected because the principal research questions concern the legal protection of freedom of religion and belief, the relationship between constitutional guarantees and public-order considerations, and the normative quality of law enforcement in the Sukabumi case. The study did not conduct interviews, surveys, or direct field observation; accordingly, its conclusions are legal-analytical rather than empirical claims about the motivations of all actors involved.

Two main approaches were employed. The statutory approach was used to examine the 1945 Constitution, Law No. 39 of 1999 on Human Rights, Law No. 12 of 2005 ratifying the International Covenant on Civil and Political Rights, Law No. 1/PNPS of 1965 on the Prevention of Religious Abuse and/or Defamation, and the Joint Regulation of the Minister of Religious Affairs and the Minister of Home Affairs Nos. 9 and 8 of 2006 concerning the implementation of religious harmony and houses of worship. The conceptual approach was used to analyze legal ideas relevant to constitutional rights, the rule of law, substantive justice, non-discrimination, judicial protection, and the relationship between individual rights and public order. The methodological orientation follows the normative research framework described by Wiraguna (2024) and is supported by the broader discussion of normative and empirical legal research in Nurliana et al. (2026).

The legal materials were organized into three categories. Primary legal materials consisted of constitutional and statutory instruments and the relevant ministerial regulation. Secondary legal materials included peer-reviewed journal articles, legal books, scholarly discussions, and published research concerning religious freedom, minority protection, constitutional adjudication, and law enforcement. Tertiary materials, where necessary, were limited to supporting definitions or general legal terminology. News reports and public reports concerning the Sukabumi incident were not treated as substitutes for primary legal norms or peer-reviewed scholarship. They were used only to reconstruct the factual chronology that became the object of normative analysis.

The selection of materials was based on relevance to the three research questions. Legal instruments were included when they directly regulated freedom of religion and belief, human rights protection, public order, or the administrative governance of houses of worship. Scholarly sources were prioritized when they addressed recent developments in Indonesian religious-freedom law, minority protection, constitutional interpretation, or legal methodology. Older books were retained only when they supplied foundational theoretical perspectives used by the manuscript, particularly the ideas of progressive law, constitutional rights, and Indonesian legal politics. This selection strategy was intended to reduce descriptive accumulation and to ensure that each source performed a clear analytical function.

The analysis proceeded in four stages. First, the relevant constitutional, statutory, administrative, and international norms were inventoried and classified according to the form of protection or limitation they established. Second, the factual chronology of the Sukabumi incident was reconstructed from the cited public reports, with attention to the distinction between allegations concerning religious activities and the criminal acts processed by law-enforcement institutions. Third, the legal norms were interpreted in relation to scholarly concepts concerning equality, minority protection, substantive justice, and judicial consistency. Fourth, the study evaluated the coherence between normative guarantees and the legal responses evident in the case, and then formulated recommendations for regulatory and institutional improvement.

The technique of legal interpretation was qualitative and argumentative. The analysis compared the purpose and protective orientation of the legal norms with the practical issues raised by the case. Particular care was taken not to infer facts that were not supported by the cited materials. For that reason, the article does not determine the subjective religious motivations of individual defendants or residents. Instead, it analyzes the legal significance of a conflict in which perceptions about religious activity formed part of the social context and in which criminal damage was subsequently prosecuted. This limitation is important because it keeps the conclusions within the scope of normative legal research and prevents factual claims from exceeding the documentary basis of the study.

## RESULTS AND DISCUSSION

The results show that the Sukabumi case cannot be understood adequately through a single legal category. The criminal process addressed destruction of property, while the social background raised questions concerning the practical security of religious freedom. The normative framework, meanwhile, contains both strong constitutional guarantees and administrative mechanisms that may become contentious when local resistance is directed toward minority religious activities. The discussion therefore proceeds from the case chronology to the legal framework, the principal law-enforcement problems, and the measures required to improve legal protection.

In June 2025, a conflict occurred at a house or villa in Tangkil Village, Cidahu, Sukabumi. Public reporting cited in the manuscript indicates that the location was a private house or retreat facility rather than a church building. Nevertheless, perceptions that Christian worship or retreat activities were taking place at the location contributed to social tension. Police initially named seven suspects and later added an eighth suspect after examining witnesses. The alleged conduct involved damage to a fence, windows, and a motorcycle, and the case was processed under the criminal-law provision concerning collective destruction of property (Putra, 2025).

Mediation was undertaken by local institutions, including elements of the regional leadership coordination forum, the Indonesian Ulema Council, and the police. The owner also reached an agreement concerning future religious activities at the location. However, the criminal process did not cease because the authorities treated property destruction as an offense that could not be eliminated merely through a private settlement. The local government provided assistance for property repair and trauma recovery. In the subsequent proceedings, the court found the defendants guilty of property destruction and imposed five-month prison sentences. The decision emphasized the criminal nature of the destruction and avoided framing the judgment as a determination of religious legitimacy (Alamsyah, 2025; Usman, 2025).

From the perspective of legal certainty, continuation of the criminal process was significant. It conveyed that collective destruction cannot be justified by disagreement over religious activity, assumptions regarding permits, or local objections. The decision also preserved the principle that private mediation and compensation do not automatically erase public criminal responsibility. This point is consistent with the broader idea that law enforcement must protect persons and property from coercive collective action. At the same time, the case demonstrates that criminal adjudication is only one part of the state's responsibility. Preventive measures are equally important because a legal system that reacts only after damage has occurred does not fully address the vulnerability created by intolerance or misinformation.

The court's effort to characterize the matter as a property-damage case can also be understood as an attempt to prevent the proceedings from deepening sectarian polarization. Such legal objectivity is valuable, especially where public narratives can rapidly transform a local dispute into a broader religious conflict. Nevertheless, avoiding religious labeling in the criminal judgment does not mean that the surrounding freedom-of-religion issues should disappear from legal analysis. The fact that assumptions about worship could trigger collective pressure is itself relevant to evaluating the effectiveness of constitutional protection. The appropriate analytical position is therefore to preserve the criminal classification while separately examining whether the state has adequate mechanisms to prevent religiously charged pressure from threatening citizens' rights.

### Legal Regulation of Freedom of Religion and Belief in Indonesia

The constitutional foundation of religious freedom is principally located in Article 28E and Article 29 of the 1945 Constitution. These provisions establish a strong normative commitment to individual freedom of religion, belief, and worship. Law No. 39 of 1999 on Human Rights reinforces this protection, particularly through provisions recognizing the freedom of each person to embrace a religion and to worship according to that religion or belief. Together, these norms position religious freedom as part of the core human-rights framework of the Indonesian legal system (Republic of Indonesia, 1945).

The national framework is also connected to international human-rights obligations through Law No. 12 of 2005, which ratified the International Covenant on Civil and Political Rights. The significance of this ratification is that the protection of religious freedom is not merely a matter of domestic constitutional policy; it is also situated within an international legal commitment undertaken

by Indonesia (Republic of Indonesia, 2005). In normative terms, this connection strengthens the expectation that domestic rules and administrative practices should be interpreted consistently with human-rights protection and non-discrimination.

At the same time, the Indonesian legal framework contains regulations designed to manage religious harmony, public order, and the administration of houses of worship. Law No. 1/PNPS of 1965 and the Joint Regulation of the Minister of Religious Affairs and the Minister of Home Affairs Nos. 9 and 8 of 2006 are frequently discussed in relation to the governance of religious expression and the establishment or use of places of worship. The stated policy objective of such regulation is to maintain social order and harmony. However, regulatory mechanisms can become problematic when procedural requirements are implemented in a manner that gives majority opposition decisive influence over the practical exercise of minority rights (Republic of Indonesia, 1965; Minister of Religious Affairs & Minister of Home Affairs, 2006).

The central normative issue is therefore one of harmonization. Constitutional guarantees, human-rights legislation, international commitments, criminal-law protection, and administrative regulation should operate as a coherent system. Administrative procedures should facilitate orderly governance without transforming local disagreement into a practical veto over constitutional rights. Criminal law should protect persons and property without becoming the only mechanism used after conflict has escalated. Courts should provide predictable rights-based interpretation, and public authorities should adopt preventive measures when social tension threatens peaceful religious activities. A fragmented approach, in which each institution focuses only on its narrow mandate, risks leaving significant gaps in protection.

Scholarly analysis supports this need for coherence. Sanjaya and Rahim (2024) describe a duality in constitutional interpretation concerning freedom of religion and belief, suggesting that judicial protection can vary depending on the complexity and political sensitivity of the issue. Bimasakti (2025) similarly emphasizes the importance of an inclusive legal framework for the recognition of religions and beliefs. These findings indicate that the strength of constitutional protection is influenced not only by the existence of formal norms but also by the interpretive and administrative practices through which those norms are applied. Consequently, reform must address both the text of regulation and the institutional behavior that determines its practical meaning.

The philosophical dimension of the Indonesian rule of law also matters. Hanyfah et al. (2024) link Indonesian legal development to Pancasila as a foundational value system. Within that framework, religious freedom should not be viewed as an individual interest opposed to collective harmony. Rather, legal protection should seek a form of harmony grounded in equal dignity, lawful dispute resolution, and non-coercion. Public order loses legitimacy when it is maintained by permitting intimidation or by shifting the burden of social resistance onto the group whose constitutional rights are at stake. Conversely, rights protection becomes more sustainable when public institutions combine firm enforcement against unlawful conduct with dialogue, mediation, and legal education designed to prevent conflict.

### **Law-Enforcement Problems in the Sukabumi Conflict**

The first law-enforcement problem is inconsistency in legal interpretation. Formal constitutional guarantees can lose effectiveness when institutions apply different standards to similar questions of religious freedom. Sanjaya and Rahim (2024) identify differences between more protective judicial activism and more restrained approaches in sensitive cases. From a rule-of-law perspective, such inconsistency creates uncertainty for citizens, local governments, and law-enforcement officers. If the scope of protection appears dependent on political sensitivity or social pressure, constitutional rights become less predictable. The challenge is therefore not only to recognize religious freedom but also to develop a sufficiently stable doctrinal framework for deciding when and how public authorities may regulate religious activities.

The second problem is the continuing influence of majority pressure. Haidarrani et al. (2024) discuss discriminatory patterns affecting religious minorities, and the Sukabumi incident illustrates why this issue remains important. When objections by a dominant local group become the primary reference point for administrative or security decisions, minority citizens may experience a practical reduction of rights even though the legal text remains unchanged. The risk is particularly serious when officials respond to threatened disorder by restricting the activity of those targeted by protest rather than by

controlling unlawful coercion. Such an approach can unintentionally reward pressure and encourage the expectation that constitutional rights are negotiable through collective mobilization.

The third problem is a predominantly reactive model of law enforcement. In the Sukabumi case, the criminal process proceeded after property had already been damaged. The subsequent prosecution was important, but it could not fully restore the sense of security lost during the incident. A rights-based system should therefore combine prosecution with preventive protection. Police intelligence, early mediation, clarification of misinformation, coordination with local authorities, and rapid intervention against threats can reduce the probability that a disagreement escalates into violence. Preventive protection is especially important in disputes involving identity because social rumors can spread faster than formal legal clarification.

The fourth problem concerns administrative regulation. Requirements related to houses of worship are intended to organize community relations and reduce conflict, but they may become exclusionary when interpreted as requiring social approval in circumstances where local resistance is already shaped by religious difference. The source manuscript notes that the Joint Regulation of 2006 has generated controversy because minority communities can face greater difficulty satisfying local requirements. Hanyfah et al. (2024) support the need for a more inclusive approach that emphasizes dialogue and mediation rather than a simple majority-based model. Administrative law should not create incentives for groups to oppose religious activities merely because opposition can make permits harder to obtain.

The fifth problem is conceptual confusion between public order and rights protection. Public order is a legitimate governmental concern, but it should not be understood only as the absence of visible conflict. An apparently calm situation achieved by preventing a minority group from exercising its rights is not equivalent to lawful and sustainable order. Substantive public order requires the state to ensure that citizens resolve disagreement through legal institutions rather than intimidation. In this sense, enforcing the law against property destruction in Sukabumi supported public order, while future preventive measures must ensure that the possibility of collective resistance does not become a reason to narrow religious freedom.

The sixth problem is the limited integration of criminal, constitutional, and administrative responses. Police may focus on offenses, local governments on social stability, religious authorities on harmony, and courts on the charges before them. Each institutional perspective is legitimate, but fragmented action can produce gaps. An integrated response would distinguish legal questions clearly: criminal responsibility should be determined by criminal law; the status and use of property should be assessed through applicable administrative rules; religious freedom should be protected through constitutional and human-rights standards; and social tension should be addressed through dialogue that does not compromise legal equality. This division of functions can prevent one legal issue from being used improperly to decide another.

### **Strengthening Law Enforcement and Rights Protection**

The first required measure is stronger harmonization of legal interpretation. Courts and public institutions need a consistent rights-oriented framework for evaluating disputes involving religious freedom. Consistency does not require identical outcomes in every case, but it does require transparent reasoning about constitutional guarantees, lawful limitations, equality, and the relationship between rights and public order. Judicial decisions should explain why a particular restriction or administrative requirement is necessary and how it remains compatible with constitutional protection. A more coherent body of reasoning would provide guidance for lower-level authorities and reduce reliance on ad hoc political compromise.

Second, law-enforcement institutions should strengthen neutrality and human-rights competence. Training on constitutional rights, pluralism, non-discrimination, and conflict de-escalation can help officers distinguish legitimate public-order concerns from pressure designed to curtail minority rights. This recommendation is consistent with Rahardjo's (2009) view that law should serve human beings and substantive justice rather than operate as a purely formal mechanism. Neutrality should be supported by internal and external accountability so that operational decisions can be reviewed when they appear to favor dominant social pressure over legal equality.

Third, preventive protection should be institutionalized. Local police, local government, religious-harmony forums, and civil-society actors need protocols for responding to early signs of

conflict. These protocols may include verification of factual claims, rapid public clarification, facilitation of lawful dialogue, protection of persons and property, and clear communication that disagreement must be resolved through legal procedures. Preventive measures are not intended to suppress community participation; rather, they aim to ensure that participation occurs without intimidation, destruction, or coercive vetoes over the rights of others.

Fourth, administrative regulation should be reviewed from the perspective of equal access and proportionality. The Joint Regulation of 2006 should be implemented, and where necessary reformed, so that procedural requirements facilitate orderly religious life without creating structurally heavier burdens for minority communities. Dialogue and mediation can remain important, but they should function as tools for accommodation rather than mechanisms by which the majority determines whether a minority may exercise a constitutional right. Bimasakti (2025) and Hanyfah et al. (2024) provide support for a more inclusive legal orientation in this area.

Fifth, the protection framework should address intolerance and discriminatory conduct more clearly. The source materials indicate concern that law enforcement can become inconsistent or excessively reactive. The legal system should therefore distinguish protected expression and disagreement from threats, coercion, destruction, or discriminatory obstruction. Clear institutional guidance can help police and prosecutors respond proportionately while avoiding the perception that religious disputes are resolved selectively. Such clarity is particularly important in the digital environment, where misinformation and provocative claims can quickly intensify local disputes.

Sixth, the role of the state should be complemented by sustained civic education. Multicultural education, public legal literacy, and interreligious engagement can reduce the social conditions in which rumors become triggers for collective action. These measures should not be treated as substitutes for law enforcement; they are preventive complements to it. Strong legal protection without social understanding may remain fragile, while dialogue without credible enforcement may leave vulnerable groups unprotected. Effective policy therefore requires both a firm legal baseline and continuous public education regarding constitutional rights and lawful mechanisms of dispute resolution.

The Sukabumi case demonstrates how these reforms can operate together. Police action against property damage establishes a minimum rule that collective destruction is unlawful. Administrative clarification can resolve questions about the legal status or use of a location. Local government can facilitate dialogue to reduce tension. Courts can maintain objective adjudication while preserving constitutional principles. Human-rights education can help officials and communities avoid framing minority rights as privileges dependent on local acceptance. When these functions are coordinated, public order and religious freedom reinforce rather than undermine each other.

This integrated model also clarifies the relationship between individual rights and collective harmony. The protection of religious freedom does not require the state to ignore legitimate regulation, and the maintenance of public order does not require the state to surrender rights to majority sentiment. The appropriate legal objective is ordered freedom: a condition in which citizens may exercise constitutional rights within a predictable legal framework, and disputes are resolved by institutions rather than coercive mobilization. Achieving that condition requires harmonized norms, professional enforcement, inclusive administration, and a public culture that recognizes legal equality.

Theoretically, the findings support the argument that constitutional rights are effective only when institutional practices give them operational meaning. Asshiddiqie (2006) places constitutional rights at the center of the state's responsibility, while Mahfud MD (2010) situates legal policy within the Indonesian constitutional and Pancasila framework. Rahardjo (2009) adds a substantive-justice perspective by emphasizing law's human orientation. Read together, these perspectives support a model in which legal institutions are not passive interpreters of written rules but active guarantors of equal citizenship. The Sukabumi incident illustrates the practical importance of that role because the relevant legal issues extended beyond the punishment of a completed offense to the prevention of future rights violations.

The findings are also consistent with recent scholarship. Amer et al. (2024) identify the gap between constitutional protection and political-legal implementation; Sanjaya and Rahim (2024) highlight uncertainty in judicial approaches; Haidarrani et al. (2024) discuss discriminatory treatment affecting religious minorities; Hanyfah et al. (2024) emphasize the philosophical basis of the Indonesian legal system; and Bimasakti (2025) stresses the need for an inclusive framework for religion and belief. The present study extends these discussions by showing how their concerns converge in one local

conflict. The contribution is not a claim that the Sukabumi case represents every religious-freedom dispute in Indonesia, but that it provides a legally instructive example of how criminal law, constitutional rights, administrative rules, and public-order policy can intersect.

### **Institutional Implications and Future Research**

The institutional implications of these findings are significant because freedom-of-religion disputes often move across several levels of government at the same time. Police officers may be required to prevent violence, local governments may be expected to clarify administrative status, religious-harmony institutions may facilitate communication, and courts may later assess criminal responsibility. Without a shared legal orientation, each institution can act rationally within its own mandate while the overall protection of rights remains incomplete. A coordinated approach should therefore begin with a common principle: no administrative or social disagreement can justify violence, intimidation, or destruction, and no public-order response should shift the burden of threatened disorder onto the persons whose lawful activity is being challenged. This principle can guide institutional coordination without eliminating the specific legal competences of each agency.

For local government, the case underlines the importance of distinguishing conflict management from rights adjudication. Mediation may be valuable for preventing escalation, but it should not become a mechanism for bargaining away constitutional protection. Agreements reached under conditions of social pressure must be assessed carefully because apparent consensus does not always mean that the parties possess equal bargaining power. Local authorities should therefore use mediation to clarify facts, identify lawful administrative requirements, and build practical accommodation, while preserving the principle that constitutional rights are not dependent on the approval of the most influential local group. This approach would make mediation more consistent with the rule of law and reduce the risk that informal settlements become precedents for future pressure.

For law-enforcement agencies, the distinction between the immediate criminal offense and the wider rights context should be incorporated into operational practice. The prosecution of property destruction in Sukabumi was an important legal response, but officers facing similar disputes also need criteria for early protection. These criteria should include the credibility of threats, the vulnerability of the targeted group, the presence of misinformation, the possibility of rapid collective mobilization, and the availability of lawful administrative clarification. Early intervention based on such indicators would not prejudge criminal guilt; rather, it would help authorities prevent an environment in which disagreement escalates into unlawful action. The objective is to make law enforcement preventive as well as punitive.

For courts, future adjudication can benefit from reasoning that explicitly separates criminal elements from constitutional context. A criminal court may properly decide a case on the elements of the charged offense without transforming the proceeding into a broad constitutional case. However, clear acknowledgment that violence or destruction cannot be justified by religious disagreement can strengthen the expressive function of the judgment. In parallel, constitutional and administrative adjudication should continue to develop coherent standards for evaluating rules that affect worship, minority access, and local administrative approval. Greater consistency across these domains would help citizens understand that criminal law, administrative law, and constitutional rights form parts of a single legal order rather than competing sources of authority.

These implications also identify an agenda for future research. Because the present study is normative, it cannot establish how residents, victims, police officers, local officials, or religious leaders understood the incident or the subsequent legal process. Empirical research could examine whether the continuation of criminal proceedings improved perceptions of legal fairness, whether mediation reduced or displaced social pressure, and how administrative rules are interpreted by different local actors. Comparative research across several regions could also test whether the problems identified in Sukabumi are recurring patterns or highly context-specific. Such work would complement the present normative findings and provide a stronger evidence base for evaluating the practical effects of regulatory and institutional reform.

### **CONCLUSION**

This study concludes that Indonesia possesses a substantial normative framework for protecting freedom of religion and belief through the 1945 Constitution, human-rights legislation, administrative

regulation, and international legal commitments. The principal challenge lies in implementation. The Sukabumi case showed that law-enforcement authorities were able to continue a criminal process for property destruction despite mediation, thereby affirming legal certainty and rejecting collective destruction as a legitimate means of resolving disagreement. At the same time, the social background of the incident demonstrated that religious freedom remains vulnerable when perceptions about worship activities become a basis for community pressure and when preventive protection is weaker than reactive enforcement.

The analysis identifies six interconnected concerns: inconsistent legal interpretation, majority pressure, reactive rather than preventive protection, potentially exclusionary administrative implementation, conceptual confusion between public order and rights protection, and fragmented institutional responses. Addressing these problems requires harmonized rights-oriented interpretation, professional and neutral law enforcement, stronger preventive protocols, inclusive administrative reform, clearer protection against intolerant and discriminatory conduct, and sustained civic and human-rights education. These measures should be pursued as an integrated legal strategy so that public order is maintained through law rather than through the restriction of vulnerable groups. The study is limited by its normative design and reliance on documentary materials; future empirical research could examine the perspectives of affected communities, law-enforcement officers, local authorities, and religious institutions to evaluate how these normative recommendations operate in practice.

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