

Legal Protection Of Copyright Owners For Violation Of Song Sung Without Permission (Case Study Of Case No. 92/Pdt.Sus-Hki/Cipta/2024)

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ABSTRACT

Copyright protection plays a vital role in the music industry, which has high economic value. However, the use of songs without permission from the copyright owner still frequently occurs, such as in the dispute between Arie Sapta Hernawan (Arie Bias) and Agnez Mo (Agnes Monica Muljoto). Agnez Mo used Arie's songs in three commercial concerts without permission. This issue focuses on the violation of the creator's economic rights due to the use of works without a license or official permission. The Jakarta Commercial Court Decision Number 92/Pdt.Sus-HKI/Hak Cipta/2024 considered the defendant's actions as copyright infringement, emphasizing the importance of permission from the rights holder before the work is used commercially. This decision provides legal certainty for creators to enjoy their economic rights and strengthens the legal position of the owner of the work. This study uses a normative juridical method with a descriptive approach, focusing on concrete case analysis. The data used comes from secondary legal materials, including primary, secondary, and tertiary materials. Data collection was carried out through literature studies, while analysis was carried out qualitatively with the stages of data verification, reconstruction of legal information, and preparation of systematic conclusions. With this approach, the research aims to examine the existence of exclusive rights of creators and the limits of their use by other parties.

Keywords: Copyright, Infringement, Unauthorized Songs.

INTRODUCTION

Art in various forms such as sculpture, painting, dance, and especially music has become an important element in the formation of national identity and a means of uniting the nation. Gatot Soepramono's thinking states that a creative work is not only intended to be enjoyed by its creator personally, but also to be utilized by society at large. The limited capacity of creators to distribute works on a mass scale gives rise to the need for a legal protection system that ensures that works are not misused by others. Such a system is necessary to maintain the integrity, originality, and economic value of creative works

produced by creative individuals.¹.

In the context of musical art, copyright not only guarantees protection against commercial gain, but also ensures that the creator is recognized as the rightful owner of his creation.²This protection is inherent and automatic from the moment a work is manifested in a tangible form that can be heard and/or recorded. Songs and music are works of art that are universal, easily accessible, and have a wide reach in society. This accessibility makes music an object that is vulnerable to copyright infringement, such as unauthorized use, illegal duplication, and republication without the creator's consent. The reality in Indonesia shows that copyright infringement in the field of music still occurs massively through various digital platforms and live performances.³.

Intellectual Property Rights (IPR) provide benefits to every individual who has the intellectual capacity to create a work that has the potential to obtain IPR protection, one of which is through the Copyright system. Within the scope of Copyright, a creator has the exclusive right to reproduce his or her own work or grant permission to others to do so, as long as it does not conflict with applicable legal restrictions. The existence of copyright gives creators the authority to control how their work can be used by others, while also acting as a preventative measure against unauthorized use, counterfeiting, and misuse of the copyrighted work. As an illustration, one form of creation protected by copyright is a song, which is defined as a musical composition containing a sequence of vocal and instrumental sounds, arranged with elements of rhythm, melody, harmony, and lyrics.⁴.

Music plays a vital role in social life as an art form with diverse functions, including as a means of self-expression, accompaniment to ceremonies, an art form with entertaining aesthetic value, and an instrument for influencing and managing emotions. The existence of music demonstrates the unique human ability to convey and regulate a wide spectrum of emotions through the medium of sound.⁵.

The use of internet technology in this contemporary era presents two sides of the coin for the music industry, especially for record companies: advantages and disadvantages. One positive aspect of the internet is the elimination of record companies'

¹Gatot Supramono, Copyright and Its Legal Aspects, PT Rineka Cipta, Jakarta, 2010, p. 1

²Yanto, O., Chen, QC, & Sari, NW "Legal Protection on Economic Rights of Pirated Work of Songs in Intellectual Properties". Nagari Law Review. Vol 6, No 1, 2022, p. 3

³Sopnar Maru Hutagalung, Copyright: Its Position & Role in Development, Sinar Grafika, Jakarta, 2012, p. 5

⁴Roisah, K. (2015). The Legal Concept of Intellectual Property Rights. Setara Press.

⁵Yuniar, P., Sitoena, JK, Matius, DM, & Obed, GB (2022). Music History as a Knowledge Base in Music Theory Learning. Journal of Music and Music Education, 3(2), p. 141.

dependence on physical product sales or conventional promotional methods, because now they have the ability to distribute their creative works through various social media platforms that can be accessed by a wider audience. However, on the other hand, there are also negative impacts, one of which is the spread of the phenomenon of individuals who make rearrangements, or what is popularly known as "cover songs," of various famous songs, and then upload these works to various social media platforms such as YouTube, Instagram, Twitter, Facebook, TikTok, and SoundCloud.⁶.

Public understanding of the royalty payment mechanism for the use of songs and music remains very limited, even though Law Number 28 of 2014 provides strong protection for creators (Ardian, 2021). In practice, royalty payments are now regulated through the National Collective Management Institute (LMKN), which is authorized to collect and distribute royalties to creators through a data-based system. The government, through the Ministry of Law and Human Rights, has stipulated that every business actor that plays music for commercial purposes, such as restaurants, cafes, entertainment venues, and hotels, is required to pay royalties to the creators of songs used in their business operations. This provision is a concrete step to guarantee the economic rights of songwriters, ensuring they remain respected in today's era of music digitalization.⁷.

In case Court Decision Number 92/Pdt.Sus-HKI/Cipta/2024 is relevant to study as a concrete instrument for implementing the provisions of the Copyright Law by the judiciary. This decision reflects how judges interpret and qualify forms of copyright infringement related to the unauthorized use of songs. An analysis of the legal considerations in this decision is expected to clarify the legal position of copyright owners and serve as a jurisprudential precedent in similar cases. This study aims to analyze the types of legal protection that can be provided to copyright holders related to violations that occur due to the use of songs sung without prior permission.

Agnes Mo is facing a copyright issue with a musician or well-known songwriter in Indonesia named Ari Bias. Agnes Mo performed one of Ari Bias's songs, entitled "Bilang Saja" without the songwriter's knowledge. Agnes Mo has performed the song in three concerts in Jakarta, Bandung, and Surabaya organized by HW Group and PT Aneka

⁶Adhila, G., & Sudjana, U. (2018). Protection of Song and/or Musical Works That Are Covered on Social Media Networks Linked to Economic Rights Based on Law Number 28 of 2014 Concerning Copyright. *Journal of Notary Law and PPATan*, 1(2), p. 223

⁷Kompas.com. (2021). Regarding Song and Music Royalty Rules, Here's the Technicalities. Kompas.Com.<https://www.kompas.com/tren/read/2021/04/10/100400965/soal-aturan-royalti-lagu-dan-musik-begini-teknisnya>, news dated April 10, 2021 and accessed July 15, 2025

Bintang Gading. Because Ari Bias feels disadvantaged, he stated that although his song was performed at various events, he did not receive the financial rights he should have. Ari Bias strictly forbade Agnez Mo from performing his songs without permission. He emphasized the importance of respecting copyright and requested that Agnez Mo no longer sing his work without permission (Kompas.com, 2025).

The focus of the discussion is directed at the legal interpretation of the legal considerations of the panel of judges in the decision and its relevance to the principles of copyright protection as determined by law. Based on the problems above, the author is interested in writing about 'Legal Protection of Copyright Owners for Infringements of Songs Sung Without Permission (Case Study of Case No. 92/Pdt.Sus-Hki/Cipta/2024)' with the identification of problems in this study as follows: (1) How is Legal Protection for Copyright Holders in Cases of Infringement of Songs Without Permission, (2) How are Sanctions Applied to Copyright Violators.

RESEARCH METHODS

Legal reasoning serves as the primary basis for data analysis in this study, where all data collected through literature studies are analyzed qualitatively to gain a deeper understanding of the legal issues under study. Legal case studies serve as a model approach because the issues discussed are resolved through jurisprudence or court decisions, making the application of a normative-applied approach relevant. Data are obtained from various legal literature, including primary legal materials such as statutory regulations, as well as tertiary legal materials that serve as complements and explanations of other legal materials. This study relies on secondary data to examine and explain the normative aspects of the cases studied. Methodologically, this study is normative-juridical and is structured using a descriptive-analytical approach. This method is used to describe existing legal facts, systematically examine them, and provide legal arguments based on applicable norms. Thus, the focus of the research is more directed at the interpretation of legal norms and their application to concrete problems that arise in judicial practice.

RESULTS AND DISCUSSION

A. Legal Protection for Copyright Holders in Cases of Unauthorized Song Infringement

Indonesia's obligation to implement standards for protecting intellectual property rights is a logical consequence of its membership in the World Trade Organization (WTO), particularly its adoption of the provisions contained in the TRIPs Agreement. This agreement requires each member country to provide adequate protection for various forms of intellectual property, including copyright in the field of music and songs.

In this context, copyright is not enough to simply be recognized, but must be enforced effectively to provide a deterrent effect to violators. Consistent and comprehensive law enforcement efforts are a concrete form of the state's commitment to supporting a healthy and equitable music industry ecosystem. This protection is divided into two types: preventive, which aims to avoid copyright disputes by regulating the rights and obligations between creators and the National Collective Management Institution (LMKN), and repressive, which is applied to resolve disputes if the use of copyrighted works without permission or payment of agreed royalties. Law 24/2014 also provides protection for the moral and economic rights of creators to protect their works from unauthorized exploitation.

Sanctions for copyright infringement according to Article 1365 of the Civil Code include several actions, namely:

1. Termination of activities involving the reproduction, distribution and sale of works that violate copyright or are pirated.
2. Providing compensation to parties who are harmed by the violation.
3. Action against copyright infringement does not only stop at enforcing the law against the perpetrator, but also targets the object of the infringement itself.

The act of singing a song without official permission from the copyright holder is a serious violation that harms not only the economic rights but also the moral rights of the creator. Under the Copyright Law, the commercial use of another person's copyright without permission is considered a crime that can be subject to criminal sanctions, including imprisonment and significant fines. Copyright infringement is not something to be taken lightly, but rather an act that violates legal norms that have been regulated in the provisions of intellectual property law in Indonesia (Articles 5 & 8). Thus, the creator has the exclusive right to grant permission or prohibit the use of his work. The law provides protection that

clearly regarding song works as objects of copyright, confirming that the right to publish or commercialize a work of creation can only be exercised with permission from the creator or copyright holder (Article 9 paragraph 1). Therefore, any use of the work without valid consent constitutes a violation of intellectual property rights protected by law.

The state demonstrates its commitment to protecting intellectual property rights by imposing criminal penalties on copyright infringers, demonstrating strong protection for creative works. The primary goal of these sanctions is to ensure a sense of justice for injured creators and to create a deterrent effect to prevent similar violations from occurring in the future.⁸ The economic compensation that a songwriter should receive is lost when another party uses their work without permission. This compensation, in fact, represents appreciation for the work the creator has done. Under applicable regulations, the exclusive right to obtain economic benefits from a work belongs only to the creator or copyright holder (Article 8). Therefore, using a work without official approval harms the creator, who has the right to obtain economic benefits from their work.

When musical works are used without consent, whether in concerts or on digital platforms, this action directly deprives the creator of their right to receive legitimate compensation. Furthermore, moral aspects are violated because the creator's name is often omitted in the publication or performance of the work. The creator's moral rights include the right to include their name in any form of use of the work (Article 5 paragraph 1). Therefore, copyright infringement not only has financial consequences but also touches on the creator's personal dignity, which must be protected under the intellectual property law system.

In case No. 92/Pdt.Sus-HKI/Cipta/2024, the Commercial Court concluded that the defendant's actions in exploiting the song for commercial purposes without the copyright holder's valid permission violated applicable law. This act is classified as a copyright infringement because it violates the creator's economic and moral rights. The creator or copyright holder has exclusive authority to grant permission for the commercial use of their work (Article 9 paragraph 1). The defendant's actions in ignoring this provision are considered a clear violation of the law.

The panel of judges deemed the violation to be an unlawful act, considering the distribution and singing of the work without permission in the context of a performance

⁸Marni E Mustafa. (2022). Various Legal Enforcement of Copyright, Patents, Trademarks, and Geographical Indications. Bandung: Alumni Publisher, p. 4

that has economic value. This decision emphasizes that copyright infringement is not only seen from the material aspect, but also from the perspective of the legal norms violated. This decision emphasizes that ignorance of copyright status cannot be used as a justification, and emphasizes the importance of written permission before a work is used publicly, including on digital platforms. The court granted the lawsuit in its entirety, ordered the payment of material damages, and prohibited the reuse of the song without official permission.

Although the law clearly regulates the protection of song copyright, enforcement in Indonesia remains weak due to various constraints, such as budget constraints, a lack of experts, and inadequate judicial understanding. Therefore, comprehensive reform of the law enforcement system is needed to ensure that music copyright infringements can be prosecuted fairly and effectively.

According to Ansori Sinungan, who previously served as Director of Copyright, the implementation of Law 28/2014 in Indonesia presents a number of challenges that can be examined from various angles. One such factor is cultural factors, where some individuals feel no guilt when consuming pirated products. Furthermore, law enforcement must be carried out firmly without discriminating against social backgrounds. From a legal perspective, there are still differing views between the public and law enforcement regarding the implementation of IPR regulations. R. Abdussalam emphasized that the various violations of the law that frequently occur in society are caused by⁹:

1. Weak action against criminals whose actions are considered minor or light
2. Police officer behavior that damages the positive reputation of law enforcement
3. Violations of the law that are allowed to continue for a short time are followed by a larger number of people without firmness from law enforcement officers.
4. Actions by police officers that damage the reputation of their unit, such as collecting extortionate fees, treating people harshly, or failing to provide quality service, make the public doubt law enforcement or police officers.

That there are several problems that occur in society regarding the enforcement of copyright law, namely:

⁹Abdussalam, "Police Law as Positive Law in Legal Discipline". In: <http://www.wipo.org>, accessed March 24, 2025.

1. Due to the low level of legal awareness in society, many individuals do not understand the consequences of copyright infringement, which leads to a high number of violations, including duplication and use of works without permission.
2. Differences in perception within society: in more collectivist societies, such as Indonesia, there's a tendency to view works as shared rather than individual property. This can hinder the recognition and respect of copyright as the exclusive right of creators.
3. Tolerance of infringement: Copyright infringement is often tolerated in certain social contexts, such as the unauthorized use of works for educational or entertainment purposes. This presents a challenge for law enforcement in enforcing Law No. 28 of 2014.
4. The offender's mentality, a public perception that copyright infringement is not serious, also poses a barrier to law enforcement. A change in attitude is needed to improve compliance with existing regulations.

According to Article 95 of Law 28/2014, creators are authorized to bring disputes regarding infringement of their exclusive rights to the Commercial Court. This judicial mechanism plays a crucial role in strengthening copyright protection for these legal entities if peaceful resolution processes such as mediation and arbitration fail. In such a lawsuit, the plaintiff can request a ruling declaring unauthorized use unlawful and seek civil damages. As a legal means of proving ownership of a work, registering a work with the DJKI can strengthen the legal standing of both creators and copyright holders. Furthermore, the government must raise public awareness of the necessity of obtaining permission before using copyrighted works through legal education and an open licensing system. Therefore, a repressive approach in the form of criminal sanctions is insufficient; it must be complemented by a preventive strategy to minimize copyright infringement, particularly of songs.¹⁰

Various obstacles to the implementation of legal protection remain a major barrier, as evidenced by the continued occurrence of copyright violations of songs. This situation reflects that although regulations are in place, their implementation has not been optimal. The firmness of law enforcement officials, public understanding of the importance of copyright, and the strength of legal norms must work in harmony for the protection of musical works to be truly effective. The state needs to improve coordination between

¹⁰Tommy Hottua Marbun, T. Keizerina Devi, and Windha Windha. (2013). "Legal Protection

Copyright on Song and Musical Works in the Form of Ringtones on Mobile Phones". Journal of Economic Law, Vol 1, No 1, p. 150

institutions and encourage the establishment of effective collective management institutions to facilitate the granting of permits and the distribution of royalties to creators. A collective licensing system can be a solution to prevent violations and create an ecosystem.

Fairness for music industry players. Justice for creators must be the primary foundation of a responsive and effective law enforcement system, not simply a normative expression.

If violations of unauthorized song use are allowed to continue without firm action, this could trigger a culture of permissiveness that jeopardizes the overall intellectual property protection system. Unclear law enforcement not only weakens state authority but also opens the door to increased copyright infringement, particularly in the music industry. In this context, decisive action is crucial to avoid setting a precedent that could undermine efforts to legally protect copyrighted works.

The state has a fundamental responsibility to ensure that its citizens receive protection for the rights to the fruits of their labor, while also ensuring that every citizen has legal certainty in their personal development. Neglecting this responsibility not only undermines public trust in the legal system but also demonstrates a failure to uphold the principles of justice and the protection of individual rights.

Therefore, a strong commitment from the state to prosecuting copyright infringement is a key element in strengthening the national legal system. Consistent law enforcement against unauthorized singing of songs is not only a form of compliance with legal norms, but also a concrete manifestation of support for creators as key actors in the creative industry.

B. Implementation of Sanctions against Copyright Violators Based on Decision No. 92/Pdt.Sus-HKI/Cipta/2024

The Defendant's album, "And The Story Goes," released in 2003, contains one of the Plaintiff's songs, "Bilang Saja," written in the same year by Indonesian composer Arie Bias. In the lawsuit dated September 9, 2024, received by the Court Clerk's Office, Niaga Central Jakarta on September 11, 2024 and registered with Number: 92/Pdt.Sus-HKI/Hak Cipta/2024/PN Niaga Jakarta, the Plaintiff claims copyright infringement of the song. The lawsuit was motivated by the use of the song "Bilang Saja" in a series of Agnez Mo concerts without permission from the creator, namely on May 25, 2023 at W Superclub Surabaya, May 26, 2023 at The H Club Jakarta, and May 27, 2023 at W Superclub Bandung. Arie Bias felt aggrieved both morally and financially by these commercial actions. Because he felt his rights were violated, he then sued Agnez Mo and the concert

organizers to the Jakarta Commercial Court as a form of effort to protect the moral and economic rights attached to his copyrighted work.

As the concert organizer, the Co-Defendant is a business entity engaged in the entertainment and lifestyle sector, with a network that includes restaurants, nightclubs, and music event organizers in various cities in Indonesia. The concerts they held took place in three different locations, namely W Superclub Surabaya on May 25, 2023, The H Club Jakarta on May 26, 2023, and W Superclub Bandung on May 27, 2023. In these concerts, the Defendant, who works as a singer or performer, performed the song "Bilang Saja" without first obtaining official approval from Arie Bias, the song's creator. This act is the main basis in this case because it is considered to violate the Plaintiff's copyright.

On June 21, 2023, the Plaintiff contacted the Defendant's manager via WhatsApp message to inquire about whether the song "Bilang Saja" had been used with permission or an official license. The Plaintiff asserted in the message that he implemented a direct licensing system, which requires parties wishing to use his work in commercial performances to obtain permission directly from the creator. The Defendant's performance of the song in a commercial concert without permission from the Plaintiff is considered a violation of the guaranteed exclusive rights and requires the use of Copyrighted works for commercial performance purposes must obtain permission from the copyright holder (Article 9 paragraph 2).

The Defendant, as a performer, has violated the Plaintiff's copyright for the song "Bilang Saja" by performing the song in a commercial concert without obtaining official permission or a license from the Plaintiff, who is the copyright holder. This is contrary to the provisions of Article 9 paragraph (2) of Law 28/2014, which requires that the use of copyrighted works in commercial public performances must be carried out with written permission from the copyright holder. This violation caused economic loss to the Plaintiff, who lost his economic rights to use the song without receiving the compensation or royalties he should have received.

The Defendant has violated the Plaintiff's copyright by using the song "Bilang Saja" commercially in a concert without official permission from the Plaintiff. The Plaintiff has clarified with LMKH which stated that no application for permission or license was submitted by the Defendant for the use of the song, which strengthens the Plaintiff's legal position. In response to this violation, the Plaintiff through his attorney has sent a warning and demanded compensation of IDR 1,500,000,000,-, based on three violations of the song in three different concerts. This demand refers to criminal sanctions and compensation for copyright violations carried out commercially (Article 113

This action is a violation of Law 28/2014, which regulates the obligation to obtain written permission from the creator or copyright holder for the commercial use of a work (Article 9 paragraphs (2) and (3)). As a result of this violation, the Plaintiff is demanding economic compensation of Rp1,500,000,000, calculated based on the three concerts that violate copyright. In addition, the Plaintiff is also demanding compensation for moral rights losses of Rp1,000,000,000, as a form of respect for the creator's moral rights. The total compensation claim reaches Rp2,500,000,000,-.

The Surabaya District Commercial Court granted part of the Plaintiff's lawsuit and stated that the Defendant had violated Copyright.

The Plaintiff sang the song "Bilang Saja" commercially in three concerts without permission. This action violates the Plaintiff's exclusive rights as a Copyright holder (Article 9 paragraphs (2) and (3)). As a result, the Defendant was sentenced to pay compensation of Rp. 1,500,000,000, consisting of payment for three concerts and court costs of Rp. 1,580,000,-. However, the panel of judges rejected the Plaintiff's other demands outside of the compensation.

In this ruling, the panel of judges clearly understood the concept of economic rights held by creators. Economic rights grant creators the exclusive right to obtain material benefits from their works. The defendant was found to have violated this provision by singing the song "Bilang Saja" commercially without permission in three different concerts. As a result of this violation, the panel of judges ordered the defendant to pay compensation of Rp1,500,000,000, calculated based on the loss per concert. This represents the restoration of economic rights lost due to copyright infringement.

The panel of judges in its decision granted part of the Plaintiff's lawsuit by ordering the Defendant to pay compensation for copyright infringement committed in three different concerts without the Plaintiff's permission. The obligation to obtain permission from the copyright holder before using the copyrighted work commercially (Article 9 paragraph (2) and (3)). The compensation imposed amounted to IDR 1,500,000,000,-, which was calculated based on three concerts with a loss value of IDR 500,000,000,- per concert, and the Defendant was also ordered to pay court costs of IDR 1,580,000,-.

However, the panel of judges rejected the Plaintiff's claim regarding compensation for moral rights because there was not sufficient evidence to prove the immaterial losses, even though moral rights (Article 5 paragraphs (1) and (2)). The panel of judges considered that the sanctions imposed on the Defendant were proportional and based on objective legal considerations, reflecting protection of the creator's economic rights and providing a

deterrent effect on perpetrators of copyright infringement.

The Surabaya District Court's Commercial Court decision No. 92/Pdt.Sus-HKI/Cipta/2024 demonstrates strong legal protection for copyright and has had a significant impact on the creative industry in Indonesia. In this case, the panel of judges has taken an important step by imposing clear and proportionate compensation sanctions for copyright infringement. This sanction not only provides justice for creators who have suffered economic and moral losses but also reflects the judiciary's commitment to upholding laws that protect intellectual works. This decision demonstrates that the law acts not only as a tool for rights restoration but also as an instrument to create a deterrent effect for perpetrators of violations, especially in the growing entertainment and creative industries sectors.

Furthermore, this ruling provides an important lesson for entertainment industry players, concert promoters, and artist management regarding the obligation to obtain official permission before using copyrighted works for commercial purposes. In the increasingly digital era, unauthorized use of copyrighted works can cause harm not only to the creator, but also damage the reputation and integrity of the work. This ruling confirms that anyone who infringes copyright can be subject to serious sanctions, including substantial compensation payments, in accordance with the provisions of Law 28/2014. Therefore, it is important for industry players to understand the legal risks that can arise from non-compliance with applicable legal provisions, and to maintain legitimate and lawful relationships with creators.

Overall, the implementation of strict sanctions in this ruling makes a significant contribution to the enforcement of copyright law in Indonesia. This is not only about securing compensation for injured parties, but also about building a legal culture that respects intellectual property rights and prioritizes compliance with existing provisions. With this ruling, it is hoped that Indonesia's creative industry can grow on a strong foundation, supported by effective legal protection and legal awareness.

high in society, particularly regarding respect for creative works. Going forward, this decision can serve as a useful reference in similar cases, helping to create a better climate for the equitable and sustainable development of the creative industry.

CONCLUSION

Intellectual Property Rights (IPR) are a category of property rights arising from intellectual endeavors and producing intangible products, such as ideas. IPR can be viewed

as an intangible asset, encompassing rights related to a person's ability to use creativity, rational thought, and reasoning to produce intellectual works. Copyright itself is an exclusive right consisting of moral rights and economic rights. Economic rights provide the opportunity for creators to gain financial benefits from their work. This serves as the basis for generating income and marketing the work, thus being referred to as economic rights because the rights mentioned in the relevant article have the potential to generate financial benefits for the creator.

In this case, Agnes Mo performed a song written by Ari Bias entitled “Bilang Saja” without any notification or permission from the songwriter. Agnes Mo is known to have performed the song three times in concerts organized by HW Group and PT Aneka Bintang Gading in Jakarta, Bandung, and Surabaya. Feeling aggrieved, Ari Bias stated that even though his song had been performed in various events, he did not receive the financial compensation he was entitled to. The concerts were considered as a copyright infringement that harmed the Plaintiff as regulated in Article 9 Paragraph (2) and Paragraph (3) of the Copyright Law. The results of this writing are in line with the Decision of the Central Jakarta Commercial Court Number 92/Pdt.Sus-HKI/Hak Cipta/2024/PN Niaga Jkt.Pst, which in its verdict sentenced the Defendant Agnes Monica to pay cash compensation to the Plaintiff in the amount of Rp. 1,500,000,000,- (One Billion Five Hundred Million Rupiah) for the commercial use of his song without permission.

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