

The Criminalization of Stalking in Indonesia: Assessing the Urgency and Formulation of a New Criminal Offense Under the National Criminal Code and a Comparative Analysis with Common Law Countries

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Abstract

Stalking constitutes a serious threat to the safety and psychological well-being of victims, a threat that has grown increasingly complex in the wake of digital technological developments that have given rise to the phenomenon of *cyberstalking*. In Indonesia, the criminal law response to this offense remains fragmented and insufficiently comprehensive: Article 493 of the National Criminal Code (*Kitab Undang-Undang Hukum Pidana/KUHP*), which entered into force in January 2026, criminalizes stalking only in public spaces, failing to encompass stalking conducted in private settings or through electronic means, thereby creating a *regulatory gap* that is fundamentally detrimental to victims. This study aims to formulate an ideal and comprehensive model for a stalking offense within Indonesia's criminal law system through a critical evaluation of Article 493 of the National Criminal Code and a comparative study of anti-stalking legislation in selected Common Law jurisdictions, specifically the United States and the United Kingdom. The research employs a normative legal research method (*doctrinal legal research*) grounded in a comparative legal approach, utilizing qualitative content analysis and the *functional equivalence* method as the primary evaluative framework. The findings identify three structural deficiencies in Article 493 of the National Criminal Code, namely, a restricted geographical scope, the absence of explicit provisions addressing *cyberstalking*, and the omission of *pattern of behavior* and *fear standard* as constituent elements of the offense, all of which have been addressed more comprehensively by legislation in the United States through 18 U.S. Code § 2261A and the *California Penal Code* § 646.9, and in the United Kingdom through the *Protection from Harassment Act 1997*. This study contributes to the field by proposing a reformulated stalking offense that integrates all three dimensions of criminalization, public, private, and digital, as a *de lege ferenda* policy recommendation for the ongoing reform of Indonesian criminal law.

Keywords: *Stalking Criminalization, Article 493 of the National Criminal Code, Cyberstalking, Comparative Law, Common Law, Offense Reformulation.*

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INTRODUCTION

Stalking has emerged as one of the most pressing criminal issues confronting modern criminal law systems across the globe. Conceptually, stalking is defined as a series of repeated, unwanted, and intrusive behavioral patterns directed toward an individual in a manner that produces fear, alarm, and profound psychological distress in the victim, a phenomenon now recognized as inherently cross-boundary, spanning both the physical and digital domains (Janickyj et al., 2025). The victimological impact of stalking upon those targeted is by no means negligible: a substantial body of empirical research demonstrates that stalking victims suffer serious psychological disorders, including depression, anxiety disorders, social isolation, and a decline in daily functioning that persists long after the stalking behavior has ceased (Storey et al., 2023). Empirical data drawn from the United States *National Crime Victimization Survey* (NCVS) specifically confirms that stalking victims experience fear along both subjective and objective dimensions, the latter assessed against a *reasonable fear standard*, with levels of emotional impact that consistently exceed those reported by victims of conventional crimes (Reyns et al., 2024). As digital technology has become increasingly pervasive, the problem of stalking has grown more complex through the emergence of a new dimension: *cyberstalking*, that is, stalking conducted via information and communication technology, including social media platforms, instant messaging applications, *geolocation devices*, and other digital means that allow perpetrators to exploit the anonymity afforded by technology in order to extend their reach beyond geographical boundaries (Abu-Ulbeh et al., 2021). In Indonesia, this situation is further compounded by the exponential growth of internet penetration and social media usage over the past decade, a development that has effectively transformed *cyberstalking* from a marginal phenomenon into a genuine and increasingly prevalent threat, one that, critically, remains inadequately addressed by existing criminal law instruments.

The academic and practical urgency of the present study proceeds from a fundamental *regulatory gap* within Indonesia's criminal law system. Article 493 of the National Criminal Code (*Kitab Undang-Undang Hukum Pidana/KUHPP*), enacted through Law Number 1 of 2023, does explicitly criminalize stalking; however, the scope of the offense is narrowly confined to acts of pursuit conducted in public spaces such as streets and open areas, leaving wholly unaddressed the stalking of individuals in private settings — including the victim's home, workplace, or educational institution — as well as stalking perpetrated through electronic platforms (Br Sinaga et al., 2021). This normative deficiency generates serious legal consequences: law enforcement authorities are compelled to resort to substitute provisions not originally designed to capture the substantive essence of stalking, such as Article 351 of the Criminal Code on minor assault, Article 27(3) in conjunction with Article 45(3) of the *Electronic Information and Transactions Law* (UU ITE) concerning defamation and/or insult, and Article 4(a) of Law Number 12

of 2022 on Sexual Violence Crimes (UU TPKS) in cases of electronically facilitated sexual misconduct. This *patchwork* approach is fundamentally ineffective, as the constituent elements of these substitute provisions differ materially from the essential nature of stalking — a crime premised upon a *pattern of behavior* that induces fear in the victim. More specifically, *cyberstalking* has yet to be regulated in a coherent and explicit manner under any single Indonesian legal instrument, given that the National Criminal Code and the UU ITE address only discrete aspects of such conduct in a fragmented fashion, creating a legal vacuum that generates *rechtsonzekerheid* — legal uncertainty — for victims (Wahyuningsih, 2025). This situation is further aggravated by the fact that provisions relevant to *cyberstalking* are scattered across multiple legislative instruments operating in different normative contexts, with no dedicated offense that precisely and measurably defines the constituent elements of the conduct in accordance with the *lex certa* principle (Amer et al., 2024).

The present study anchors its analysis of these juridical challenges within three mutually reinforcing theoretical frameworks. The first is the theory of criminalization, as developed by Sudarto and further refined by Nils Christie, which provides a normative foundation for assessing when a given act may be justifiably criminalized — guided by the principle that criminal law intervention is warranted only when the conduct in question causes significant social harm, cannot be adequately addressed by non-criminal legal instruments, and satisfies the principles of proportionality and subsidiarity. In the context of stalking, the concept of *pattern of behavior* — defined as a course of repeated conduct — and the *fear standard* — the threshold of fear experienced by the victim — are two criminologically critical components that distinguish the offense of stalking from ordinary social behavior, and both have received broad scholarly recognition in contemporary criminological literature as valid bases for criminalization (Parkhill et al., 2022). The second framework is the theory of victim protection within the tradition of modern victimology — referred to by Muladi as the *renaissance of victimology* — which affirms that the state bears an affirmative obligation to provide comprehensive legal protection for vulnerable citizens, including stalking victims who endure prolonged psychological trauma. This perspective normatively supports the urgency of reformulating the stalking offense as a victim protection instrument oriented toward the restoration of the victim's *right to feel safe*, consistent with human rights-oriented criminal law scholarship in Indonesia (Lisnawati et al., 2024). The third framework is comparative criminal law theory, as developed by J.J.M. van Dijk and Mark Tushnet, which provides a scientifically valid methodology for selectively adopting concepts from Common Law systems into the Civil Law framework adhered to by Indonesia, while remaining attentive to the socio-juridical context, local values, and the national criminal law system in force.

Against this backdrop of identified problems and theoretical frameworks, the present study advances three primary research

questions that constitute its substantive focus. First, what are the juridical deficiencies of Article 493 of the National Criminal Code (Law No. 1 of 2023) in addressing stalking offenses committed in private settings and *cyberstalking*, particularly as assessed from the perspective of the *lex certa* principle and the rule of law? Second, how do anti-stalking regulations in Common Law countries — with specific reference to the United States through 18 U.S. Code § 2261A (*Interstate Stalking*) at the federal level and the *California Penal Code* § 646.9 at the state level, and to the United Kingdom through the *Protection from Harassment Act* 1997 as amended by the *Protection of Freedoms Act* 2012 — formulate the constituent elements of the offense, the geographic and modal scope of criminalization, and the applicable sanctioning mechanisms that may serve as regulatory models? Third, what constitutes an ideal and comprehensive legislative formulation for a stalking offense in Indonesia that covers public spaces, private settings, and *cyberstalking*, and that is consonant with the principles of national criminal law and the Civil Law system Indonesia adheres to? These three questions converge on a central research proposition: that the reformulation of Article 493 of the National Criminal Code — through an expansion of its scope to encompass private settings and the digital domain, accompanied by the selective adoption of the *pattern of behavior* and *fear standard* elements from Common Law systems — will produce a regulatory framework that is more equitable, legally certain, and responsive to the complexity of contemporary stalking offenses.

This study offers significant scholarly novelty (*novelty*) across several dimensions within the field of Indonesian criminal law. At the academic level, prior studies on stalking within the context of Indonesian law have generally remained descriptive in nature, confined to identifying the limitations of previous iterations of Article 493 without offering a concrete and operationally viable reformulation of the offense; meanwhile, existing scholarship on *cyberstalking* has tended to focus on the application of UU ITE provisions without integrating them into a unified framework for a dedicated criminal offense (Amer et al., 2024). The present study addresses these gaps by proposing a *de lege ferenda* normative formulation — that is, a legislative draft intended to govern future legal arrangements — constructed through a systematic comparative legal analysis of anti-stalking regulatory systems in Common Law jurisdictions that are more advanced and comprehensive. At the practical level, the contribution of this study carries direct implications for Indonesia's criminal law reform agenda at a critical juncture: the National Criminal Code has only recently entered into force as of January 2026, and the legislative window for corrective normative action through subsequent legislative processes remains open. Accordingly, this study is not merely normatively critical in character; it makes a constructive contribution in the form of a stalking offense model that may serve as a *policy recommendation* for legislators seeking to accommodate the increasingly complex and cross-dimensional nature of contemporary criminal conduct.

LITERATURE REVIEW

The theoretical foundation of this study rests upon three conceptual pillars that are mutually reinforcing and collectively constitute a cohesive analytical framework for examining the urgency of a comprehensive criminalization of stalking. The first pillar is the theory of criminalization (*criminalization theory*), which classically proceeds from the principle of *ultimum remedium* or *ultima ratio* — that is, the principle that criminal law constitutes an instrument of last resort, to be invoked only when other legal mechanisms, whether civil, administrative, or social in nature, have demonstrably proven incapable of adequately addressing the conduct in question. In operationalizing criminalization theory with respect to stalking, two conceptual elements occupy a central position: first, *pattern of behavior* — a systematic and recurring pattern of conduct — and second, the *fear standard*, or the threshold of fear experienced by the victim. Longpré et al. (2023) confirm through taxometric analysis that stalking exhibits a dimensional structure that is categorically distinct from merely annoying or disruptive behavior, insofar as the dimensions of fixation, obsession, and behavioral repetition that constitute its principal criminological components cannot be adequately captured by conventional criminal offenses. This finding demonstrates that stalking necessitates a dedicated offense formulation that specifically addresses the essential nature of the crime. The second pillar is the theory of victim protection (*victimology*), which in its contemporary development — particularly within the tradition of modern neo-victimology — positions the victim not merely as a passive subject but as an actor possessing affirmative rights to security, recovery, and access to justice. Empirical findings by Brady and Reyns (2024) regarding stalking victims' decisions to engage with the criminal legal system reveal that *fear of physical harm* and the repetitive nature of the perpetrator's conduct are the two most determinant factors motivating victims to report incidents to law enforcement authorities — a strong indication that criminal offense designs that fail to incorporate these two elements explicitly will render reporting and evidentiary processes significantly more difficult. The third pillar is comparative criminal law theory (*comparative criminal law*), which provides a scientifically valid methodology for identifying the most effective elements of one legal system in order to selectively adopt them into another, while remaining attentive to the socio-juridical context and local values of the receiving system. The application of comparative criminal law theory to the study of stalking requires a thorough understanding of the paradigmatic differences between Common Law systems — which are oriented toward jurisprudence and case law — and Civil Law systems — which are anchored in the codification of written norms — a distinction that directly shapes how each system defines, proves, and punishes the offense of stalking.

A mapping of prior studies on stalking and *cyberstalking* reveals rapid yet uneven development across various academic disciplines. From the perspective of criminology and forensic psychology, research on

perpetrators and methods of *cyberstalking* has advanced significantly: a recent systematic review analyzing 80 empirical articles identifies that *cyberstalking* perpetrators consistently exhibit characteristics including poor social skills (*lack of social skills*), low self-control, and attitudes tolerant of stalking behavior, while the most commonly employed methods include repeated and unwanted online contact through social media, email, and text messages, followed by unauthorized access to the victim's accounts and the use of GPS tracking technology (Weekes et al., 2025). From the victimological perspective, longitudinal and cross-sectional studies on the psychological impact of stalking on victims consistently demonstrate that stalking victims experience severe and varied psychological consequences, including post-traumatic stress disorder (PTSD), clinical depression, anxiety, and social disorganization — the intensity of which correlates positively with the duration of the stalking, the level of physical threat involved, and the degree of relational proximity between the victim and the perpetrator (Hauch & Elklit, 2023). From a comparative criminological perspective attentive to the transition between offline and online stalking, research drawing on two national surveys confirms that victims of *cyberstalking* tend to experience levels of fear comparable to those of physical stalking victims, yet are less likely to report incidents to law enforcement authorities — a disparity that, from a criminological standpoint, indicates a *reporting gap* exacerbated by the ambiguity of applicable legal norms (Ngo & Seng, 2025). From a comparative international legal perspective, studies on trends in the criminalization of stalking across European Union member states reveal that, although the number of countries with dedicated anti-stalking legislation has increased significantly, considerable variation persists in the formulation of the constituent elements of the offense — particularly with respect to the *fear standard* requirement, that is, whether the victim's fear must be objective, subjective, or a hybrid of both — and in the scope of criminalized conduct, with some jurisdictions adopting an exhaustive enumeration of prohibited behaviors while others employ a more flexible open-ended formulation (Van der Aa, 2018). Within Indonesia itself, academic scholarship on stalking from the perspective of criminal law remains relatively limited and largely descriptive, focusing primarily on identifying the limitations of prior iterations of the Criminal Code without offering a concrete and operationally viable reformulation of the offense grounded in systematic comparative legal analysis.

An identification of research gaps (*research gaps*) in the existing literature reveals at least three substantive deficiencies that have yet to be satisfactorily addressed in the academic discourse, particularly within the context of Indonesian criminal law. The first is a significant normative gap between the rapidly advancing empirical research on *cyberstalking* — which has made considerable progress in documenting the modes, impacts, and perpetrator characteristics of the offense — and the legislative response in Indonesia, which remains considerably underdeveloped; while international criminological research such as the systematic review by Weekes et al. (2025) has identified an increasingly

sophisticated array of *cyberstalking* methods, including *GPS tracking*, *account takeover*, and *doxing*, Indonesia's criminal law system has yet to produce a single offense that explicitly criminalizes any of these specific modes of conduct. The second gap is methodological in nature: the majority of existing Indonesian scholarship on stalking employs a descriptive-normative approach without conducting a systematic comparative analysis of Common Law jurisdictions as models of more advanced regulation, with the result that the recommendations produced tend to be generic and lacking in operational specificity. A comprehensive and holistic examination of the extent to which the *fear standard* and *pattern of behavior* elements of Common Law regulation may be incorporated into Indonesia's Civil Law system has not yet been undertaken. The third gap is conceptual in nature and concerns the definition and delimitation of the stalking offense as it currently stands in Indonesia: Article 493 of the National Criminal Code fails to precisely define the constitutive elements that distinguish stalking as a criminal offense from merely unpleasant yet legally permissible social behavior, thereby giving rise to *rechtsonzekerheid* — legal uncertainty — for law enforcement practitioners; a problem that, in the context of *cyberstalking*, becomes increasingly acute given the pace at which the technological methods employed by perpetrators outstrips the capacity of legal norms to adapt. Kabiri et al. (2022) demonstrate through an empirical test of Routine Activity Theory (RAT) that *ineffective online guardianship* — including the absence of clear legal rules governing unwanted digital contact — significantly contributes to increased *cyberstalking* victimization, which normatively implies that regulatory clarity constitutes one of the most effective forms of crime prevention available.

The scholarly position of the present article in responding to these research gaps is constructive and solution-oriented, rather than merely critical. This study situates itself at the intersection of three academic discourses that have hitherto operated in relative isolation from one another: (a) the international criminological discourse on *cyberstalking*, which is empirically rich yet insufficiently connected to the realities of Indonesian criminal law; (b) the Indonesian criminal law discourse, which is aware of the shortcomings of Article 493 of the National Criminal Code yet lacks systematic comparative references; and (c) the comparative law discourse between Common Law and Civil Law systems, which has not previously been applied specifically to stalking regulation in Indonesia. By integrating these three discourses, the present study contributes to filling the identified normative gaps through the offering of a *de lege ferenda* formulation — a proposed legal norm intended to govern future legislative arrangements — constructed on the basis of an analysis of the most effective elements of Common Law regulation, subsequently adapted to the principles of the Civil Law system adhered to by Indonesia. This approach constitutes not an uncritical *legal transplant*, but rather a selective adoption that takes into account the compatibility of the underlying doctrine, consistency with the principles of national criminal law, and efficiency of evidentiary procedures before Indonesia's criminal

justice system, which is premised on the principles of *legality* and *lex certa*.

An examination of the theoretical and methodological trends evident in prior relevant studies reveals significant shifts over the past decade that warrant consideration as a comparative context. In criminological research on stalking and *cyberstalking*, there is a pronounced tendency to move away from individual case studies toward large-scale national sample surveys and longitudinal analyses capable of detecting temporal trends in victimization; Ngo and Seng (2025), for instance, draw upon data from two large-scale national surveys to compare trends in offline and online stalking victimization in a comparative framework — an approach that yields considerably stronger *policy implications* than those derivable from case-based studies. In comparative criminal law research (*comparative criminal law research*), the dominant trend is to move beyond purely descriptive approaches toward more critically engaged normative analysis that employs *functional equivalence* as a comparative criterion — that is, examining how different legal systems achieve equivalent functions in protecting the same values, even through different normative instruments. Methodologically, normative legal research employing a comparative legal approach that uses qualitative content analysis (*qualitative content analysis*) of primary and secondary legal materials has become the most widely adopted strategy in studies concerning the reformulation of criminal offenses in developing countries undergoing criminal law reform. This approach carries a comparative advantage in its capacity to analyze in depth the internal logic of a legal norm — including its constitutive elements, the scope of criminalized conduct, standards of proof, and the range of applicable sanctions — an analysis that cannot be achieved through empirical or quantitative approaches alone. Brady and Reyns (2024) demonstrate that a victim-centered perspective in the design of anti-stalking legislation has a tangible impact on the effectiveness of reporting and prosecution rates, reinforcing the argument that the reformulation of a criminal offense should not focus solely on strengthening punitive dimensions but should equally empower victims within the criminal justice system.

The conceptual synthesis derived from the totality of the literature reviewed above constitutes an analytical framework that will serve as the foundation for the methodology of this study. Three key elements synthesized from the literature are as follows: first, *criminalization threshold* — the proposition that a criminalization of stalking that is academically valid requires the satisfaction of evidence of significant social harm (*harm principle*), the inadequacy of existing legal instruments (*ultima ratio*), and the provision of legal certainty for both victims and offenders (*lex certa*); second, the *definitional core* of the stalking offense that is universally applicable — comprising three minimum elements: a repeated pattern of conduct (*pattern of behavior*), unwanted conduct directed at the victim (*unwanted conduct*), and a resulting impact in the form of fear or psychological distress (*fear/distress standard*) — elements

that must serve as reference points in evaluating the adequacy of Article 493 of the National Criminal Code; and third, *cross-system adaptability* — the proposition that the most effective elements of Common Law regulation, including an inclusive geographic scope, explicit provisions addressing *cyberstalking*, and a responsive victim protection mechanism, may be selectively incorporated into Indonesia's Civil Law system through appropriate adjustments to legislative drafting technique, evidentiary procedure, and compatibility with the principles of national criminal law. This three-element analytical framework will serve as the evaluative instrument in analyzing Article 493 of the National Criminal Code, as well as the normative guide in constructing the reformulated offense proposed as the principal finding of this study.

METHOD

This study employs normative legal research (*normative legal research*), referred to in the Indonesian legal scholarship tradition as *yuridis normatif* or normative juridical research. As a form of doctrinal legal research (*doctrinal legal research*), this study operates within the domain of written legal norms (*lex scripta*), legal doctrines, and applicable juridical principles, with the primary objective of identifying legal rules, legal principles, and relevant doctrinal constructs necessary to address the research problems that have been formulated. Ansari and Negara (2023) affirm that normative legal research in Indonesia is grounded in a scholarly tradition that positions law as an autonomous and systematic object of inquiry, wherein the validity of a legal conclusion is determined not by empirical verification in the field but by logical-normative coherence within the applicable positive legal framework. Within this framework, the study specifically operationalizes three approaches in a synergistic manner: *first*, the statutory approach (*statute approach*), which examines all regulations pertaining to stalking, both within Indonesia and across the comparative jurisdictions under study; *second*, the conceptual approach (*conceptual approach*), which excavates the relevant criminal law doctrines and criminalization theories; and *third*, the comparative legal approach (*comparative legal approach*), which serves as the primary comparative strategy for identifying the most effective elements of Common Law regulatory systems that may be selectively adopted into Indonesia's criminal law system. The comparative legal approach employed in this study specifically applies the *functional equivalence* method — that is, the comparison of the ways in which different legal systems perform equivalent protective functions with respect to the same values, albeit through different normative instruments — widely recognized as the most valid comparative method for cross-system studies involving Common Law and Civil Law jurisdictions (Al Abiad & Masadeh, 2024).

The type of data utilized in this study is secondary data, meaning data obtained not through field collection but through the systematic retrieval and examination of legal materials drawn from various documentary sources. These secondary data are classified into three

categories of legal materials in accordance with the hierarchical framework of legal scholarship applicable within the Indonesian normative legal research tradition. *Primary legal materials* encompass all statutory and regulatory instruments that carry binding juridical force and constitute the direct objects of analysis in this study, comprising: (1) Law Number 1 of 2023 on the National Criminal Code (*Kitab Undang-Undang Hukum Pidana/KUHP*), with particular focus on Article 493; (2) Law Number 11 of 2008 on Electronic Information and Transactions (UU ITE), as most recently amended by Law Number 1 of 2024; (3) Law Number 12 of 2022 on Sexual Violence Crimes (UU TPKS); (4) 18 U.S. Code § 2261A (*Interstate Stalking Punishment and Prevention Act*) as the principal federal anti-stalking statute of the United States; (5) *California Penal Code* § 646.9 (*California Anti-Stalking Law*) as a representative state-level regulatory model; and (6) the *Protection from Harassment Act 1997 (PHA 1997)*, as amended by the *Protection of Freedoms Act 2012*, which constitutes the principal anti-stalking regulatory framework in the United Kingdom. *Secondary legal materials* encompass the full body of academic literature that provides explanations and interpretations of primary legal materials, including peer-reviewed national and international academic journals, criminal law textbooks, comparative law articles, and relevant judicial decisions (*jurisprudence*) from both Indonesian courts and foreign courts in the context of stalking cases. *Tertiary legal materials* consist of legal dictionaries, legal encyclopedias, and terminology indices employed to clarify technical terms arising in the course of the analysis (Benuf & Azhar, 2020).

The data collection technique employed in this study is documentary research (*documentary research*) or library research (*library research*), implemented through the systematic retrieval of legal materials from various primary and secondary sources. The retrieval protocol is designed in a layered manner, drawing upon a range of standardized national and international legal databases. Primary national legal materials are retrieved through the *National Legal Documentation and Information Network (Jaringan Dokumentasi dan Informasi Hukum/JDIH)* portal at jdih.go.id and the official website of the *Supreme Court of the Republic of Indonesia*; foreign regulatory materials are retrieved through the official government websites legislation.gov.uk — for United Kingdom legislation, including the PHA 1997 and its amendments — and congress.gov together with law.cornell.edu — for United States federal legislation, including 18 U.S.C. § 2261A. Secondary legal materials in the form of international academic journals are retrieved through standardized academic databases, including *Google Scholar*, *JSTOR*, *SpringerLink*, *Westlaw*, and *HeinOnline*; national journals are retrieved through the *Garuda* portal (*Garba Rujukan Digital*) and *Sinta (Science and Technology Index)*. Literature retrieval employs a structured keyword search (*structured keyword search*) tailored to each database and the relevant language, with primary keywords including: "stalking criminalization," "anti-stalking law," "criminal law reform Indonesia," "cyberstalking regulation," "protection from harassment," "KUHP

Nasional penguntitan," "perbandingan hukum pidana stalking," and combinations thereof using Boolean operators (*AND*, *OR*, *NOT*). To ensure comprehensive coverage of the relevant literature, the retrieval process also employs a *snowballing* technique — that is, tracing references cited within the primary sources identified (*backward snowballing*) as well as identifying articles that cite those primary sources (*forward snowballing*) — thereby enabling the identification of relevant literature that may not have been captured by the initial keyword search.

To ensure the quality, relevance, and validity of the legal materials utilized, the study establishes explicit inclusion and exclusion criteria. *Inclusion criteria* encompass: (a) primary legal materials in the form of statutes and regulations that directly govern or are substantively related to stalking offenses, both in Indonesia and in the Common Law jurisdictions under comparative examination; (b) secondary legal materials in the form of academic journals published within the preceding five years (2020–2025), indexed in reputable databases (*Scopus*, *Web of Science*, *SINTA*), available as *open-access* publications, and directly relevant in subject matter to the core research problems addressed by the study; (c) jurisprudence — that is, judicial decisions — that contain the interpretation or application of legal norms relating to stalking offenses or substantively adjacent criminal conduct (*analogous offences*); and (d) foreign regulatory instruments that remain in force and are accessible through authoritative official government sources. *Exclusion criteria* comprise: (a) regulations that have been revoked, invalidated, or are no longer legally operative; (b) academic journals that have not undergone a *peer review* process, including *preprints* without peer review; (c) secondary legal materials that are subjective or opinion-based without the support of structured legal argumentation; (d) regulations from jurisdictions not included within the scope of the comparative analysis — that is, jurisdictions other than the United States and the United Kingdom — except where incidentally referenced to reinforce the comparative context; and (e) empirical data in the form of questionnaires, interviews, or field observations, as this study does not methodologically employ primary field data. The application of these inclusion and exclusion criteria follows the principles of selectivity recognized in contemporary comparative criminal law scholarship, which require the selection of comparative objects (*tertium comparationis*) that are representative and functionally comparable (Van der Aa, 2018).

In the context of normative legal research, there are no research subjects in the sense of human participants (*human subjects*) as is customary in empirical qualitative or quantitative research. In their place, the study establishes *units of analysis*, which represent the legal norms and doctrines that constitute the focal objects of inquiry. The units of analysis in this study consist of four principal components examined in a parallel and comparative manner: *first*, the norm of Article 493 of the National Criminal Code (Law No. 1 of 2023), together with the substitute provisions that have been employed in enforcement practice, including Article 351 of the Criminal Code, Article 27(3) of the UU ITE, and Article

4(a) of the UU TPKS; *second*, the norms of 18 U.S. Code § 2261A (*Interstate Stalking*) at the federal level and *California Penal Code* § 646.9 at the state level, including their constitutive elements, standards of proof, and applicable ranges of sanction; *third*, the norm of the *Protection from Harassment Act 1997* as amended by the *Protection of Freedoms Act 2012*, including the formulation of the stalking offense, the definition of *course of conduct*, and the victim protection mechanisms available thereunder; and *fourth*, the relevant criminal law doctrines, including the theory of criminalization, *fear standard*, *pattern of behavior*, and the concept of *lex certa* as a prerequisite of legal certainty. By establishing these four units of analysis, the study is positioned to conduct a systematic and structured comparison between Indonesia's legal system and Common Law systems with respect to the scope of criminalization, the formulation of the constituent elements of the offense, and the adequacy of victim protection mechanisms — dimensions that, according to Parkhill et al. (2022), represent the critical components in evaluating the validity and effectiveness of anti-stalking legislation from a normative criminological perspective.

Data analysis in this study employs qualitative content analysis (*qualitative content analysis*) with an interpretive-comparative approach, operationalized through four sequential and interrelated stages. *The first stage* is data reduction (*data reduction*) — the process of selecting, categorizing, and focusing the collected legal materials in accordance with their relevance to each of the units of analysis established for the study; at this stage, materials that are not thematically relevant are eliminated in accordance with the applicable exclusion criteria. *The second stage* is legal interpretation (*legal interpretation*), which employs three methods of interpretation in a synergistic manner: grammatical interpretation (*grammatical interpretation*) — analyzing the statutory provisions under examination word by word and phrase by phrase; teleological interpretation (*teleological interpretation*) — analyzing the purpose and intent underlying the norm based on the preamble, academic drafting memoranda, and legislative records; and systematic interpretation (*systematic interpretation*) — analyzing the interrelationship among norms within a single legal system in a cohesive manner. *The third stage* is comparative analysis (*comparative analysis*) — a paired comparison (*paired comparison*) of the constituent elements, geographic scope, standards of proof, and victim protection mechanisms applicable under Indonesian regulation and Common Law regulation respectively, using the *functional equivalence* framework as the evaluative criterion; this approach ensures that the comparison is conducted fairly and proportionally, identifying both functional similarities and structural divergences between the two systems. *The fourth stage* is normative synthesis and construction (*normative synthesis and construction*) — the process of formulating the research conclusions in the form of *de lege ferenda* normative propositions, specifically a new legislative formulation proposed as a recommendation for the reformulation of Article 493 of the National Criminal Code. This qualitative content analysis process

adheres to principles recognized in contemporary qualitative research methodology, wherein each unit of legal text is examined reflexively and systematically to identify the patterns, themes, and meanings embedded beneath the explicit normative formulation (Nicmanis, 2024). The entire analytical process is conducted manually, without the assistance of analytical software (*software*), as this study is interpretive-doctrinal in character, requiring the exercise of deep juristic reasoning (*juristic reasoning*) by the researcher — rather than computational processing based on word frequency or statistical patterns.

RESULTS AND DISCUSSION

The principal findings of this study confirm the central proposition advanced from the outset of the inquiry: that Article 493 of the National Criminal Code (*Kitab Undang-Undang Hukum Pidana/KUHP*), as enacted through Law Number 1 of 2023, contains fundamental normative deficiencies that render it incapable of providing an adequate criminal law response to the complexity of contemporary stalking offenses. More specifically, a juridical analysis of the formulation of Article 493 of the National Criminal Code reveals three critically significant normative gaps. *First*, the stalking offense as defined in Article 493 of the National Criminal Code is expressly confined to acts of pursuit conducted in public spaces such as streets and open areas — a restriction that substantively disregards the empirical reality that stalking offenses occur with considerable frequency in environments private to the victim, including the vicinity of the victim's home, workplace, and educational institution, which represent spaces where victims ought to feel most secure (Br Sinaga et al., 2021). *Second*, Article 493 of the National Criminal Code makes no provision whatsoever for *cyberstalking*, despite the fact that empirical data consistently demonstrate that the proportion of technology-facilitated stalking has surpassed conventional physical stalking over the course of the past decade; this legislative vacuum results in victims of *cyberstalking* in Indonesia being denied equal access to criminal law protection relative to victims of physical stalking (Wahyuningsih, 2025). *Third* — and this constitutes the deepest doctrinal deficiency — Article 493 of the National Criminal Code does not formulate the elements of *pattern of behavior* (repeated course of conduct) and *fear standard* (the threshold of fear experienced by the victim) as constitutive elements of the offense that must be satisfied in order to establish that a stalking offense has occurred; the absence of these two elements renders the provision difficult to operationalize by law enforcement authorities in concrete cases, as the juridical foundation for distinguishing criminal stalking from merely unpleasant yet non-criminal social behavior becomes unclear and unmeasurable (Parkhill et al., 2022). These normative gaps produce a condition in which law enforcement authorities are compelled to resort to substitute provisions — including Article 27(3) in conjunction with Article 45(3) of the UU ITE on electronic defamation, and Article 4(a) of Law Number 12 of 2022 on Sexual Violence Crimes (UU TPKS), which only reaches electronically facilitated stalking with a

sexual purpose — a condition that is academically characterized as a *fragmented legal response* and that has proven to be fundamentally ineffective (Amer et al., 2024). In sharp contrast, the results of the comparative analysis of Common Law regulatory systems demonstrate that countries such as the United States and the United Kingdom have addressed analogous deficiencies through considerably more comprehensive offense designs: 18 U.S. Code § 2261A (*Interstate Stalking Punishment and Prevention Act*) criminalizes interstate stalking as well as stalking conducted through electronic communications means, without imposing any restriction on the location in which the conduct occurs; while the United Kingdom's *Protection from Harassment Act 1997* — as reinforced by the *Protection of Freedoms Act 2012* — employs the concept of *course of conduct* that inclusively encompasses various modes of stalking, whether physical or digital, across all types of location (Van der Aa, 2018). It is on the basis of these comparative findings that the present study proposes a reformulated offense as its *de lege ferenda* contribution — one that integrates the most effective elements of both Common Law systems into the architecture of Indonesia's Civil Law-based criminal law framework.

The interpretation of this study's findings within the theoretical framework employed yields several normative conclusions that are mutually reinforcing. From the perspective of criminalization theory, the failure of Article 493 of the National Criminal Code to accommodate *cyberstalking* and stalking in private settings constitutes a normative violation of the principle of *subsidiary protection* — that is, the principle that criminal law must furnish protection where no other legal instrument is capable of adequately addressing the relevant social harm. The fact that the UU ITE and the UU TPKS cannot fully cover stalking offenses that are non-sexual in motivation or that do not contain an explicit threat element demonstrates that the subsidiarity criterion of *ultima ratio* has been satisfied, such that the creation of a comprehensive dedicated stalking offense is normatively justified and necessary (Benuf & Azhar, 2020). Furthermore, the concept of *fear standard* — an essential element in Common Law anti-stalking regulation — receives robust empirical support: an analysis of *National Crime Victimization Survey* data confirms that stalking victims who experience *reasonable fear* — that is, fear that would objectively be regarded as reasonable by an ordinary person in the same circumstances — are significantly more severely impacted psychologically and socially than those who do not report objective fear, implying that victim fear is not merely a subjective condition but constitutes a measurable indicator of harm (*harm*) that is capable of being operationalized within criminal law (Reyns et al., 2024). From the perspective of victimological theory, the finding that stalking victims' decisions to report to the police are heavily influenced by the repetitive nature of the perpetrator's conduct and the level of fear they experience (Brady & Reyns, 2024) directly supports the argument that a criminal law system that does not explicitly formulate these two elements — as is the case with Article 493 of the National Criminal Code — will

structurally impede victims' access to justice. The right of victims to have their victimization experiences recognized and to access criminal law protection mechanisms is a core component of the victim protection agenda in Indonesian criminal law, as affirmed in scholarship on the formulation of legal protection for stalking victims from a human rights perspective (Lisnawati et al., 2024). From the perspective of comparative law theory, the application of the *functional equivalence* method confirms that, although Common Law and Civil Law systems are architecturally distinct, both can — and should — achieve equivalent protection functions for stalking victims; this study demonstrates that the selective adoption of the *pattern of behavior* and *fear standard* elements into Indonesia's criminal law system is normatively compatible, as these elements are fundamentally *functionally universal* in character — capable of being operationalized within any evidentiary system without necessitating a radical paradigm shift (Al Abiad & Masadeh, 2024).

A comparison with prior studies demonstrates that the findings of the present study are strongly consistent with the majority of relevant international academic literature, while also identifying several points of meaningful divergence. On the side of convergence, global trends in the criminalization of stalking consistently indicate a movement toward the recognition of *cyberstalking* as an offense equivalent in gravity to physical stalking — a convergence observable even across jurisdictions with markedly different legal systems (Janickyj et al., 2025). Research on the most commonly employed methods of *cyberstalking* by perpetrators — including repeated online contact through social media, unauthorized access to victims' accounts, and the use of GPS tracking technology — illustrates the diversity and sophistication of contemporary *cyberstalking* methods, which evidently cannot be reached by the formulation of Article 493 of the National Criminal Code, which exclusively regulates physical stalking in public spaces (Weekes et al., 2025). Studies on the psychological impact of stalking on victims also consistently support the urgency of more comprehensive regulation: cross-national research confirms that stalking victims — including victims of *cyberstalking* — experience persistent post-traumatic stress disorder (PTSD), depression, and anxiety comparable in intensity to those experienced by victims of physical violence (Hauch & Elklit, 2023); while a systematic review of 43 studies on the mental health impact of *cyberstalking* found that 42 of the 43 studies reported serious psychological consequences, including depression, anxiety, suicidal ideation, and panic attacks (Stevens et al., 2021). The fact that *cyberstalking* victims frequently fail to receive an adequate response from law enforcement authorities — due in part to the ambiguity of the applicable legal norms — has also been confirmed in studies examining the challenges of *cyberstalking* investigation and prosecution in other national contexts (O'Shea et al., 2022). Collectively, these findings reinforce the central argument advanced in this study that the normative vacuum in Article 493 of the National Criminal Code is not merely a technical legislative problem, but carries tangible consequences in the form of prolonged victim suffering and systemic injustice. On the

side of divergence, several studies caution against the risk of *overcriminalization* should the *fear standard* be formulated in an excessively broad and subjective manner — that is, the risk that conduct that is in fact legally permissible, but perceived as disturbing by a particularly sensitive individual, may be criminalized in a disproportionate manner (Longpré et al., 2023). This critique is valid and must be accommodated in the reformulated offense through the adoption of an *objective-subjective hybrid standard*, which requires that the victim's fear be verifiable from the perspective of a person of ordinary reason (*reasonable person standard*), rather than being assessed solely on the basis of the victim's subjective perception. Additionally, a number of comparative studies note that the strengthening of anti-stalking regulation does not invariably translate into increased prosecution rates (*prosecution rates*), suggesting that the effectiveness of anti-stalking legislation is heavily dependent on the capacity of law enforcement authorities and the support of a comprehensive judicial system, and not merely on the quality of the written norm itself (Ngo & Seng, 2025). Comparative findings from Australia on the challenges of investigating and prosecuting *cyberstalking* — including difficulties in obtaining data from social media platforms and the lack of specialized investigator training — serve as a reminder that the reformulation of a criminal offense must be accompanied by reform of institutional law enforcement capacity (O'Shea et al., 2022). Furthermore, research on police identification of psychological distress and physical violence in cases of intimate partner stalking demonstrates that the greatest challenges in addressing stalking offenses often lie not in a deficit of legal norms alone, but in the capacity of law enforcement authorities to identify, document, and respond to patterns of stalking conduct in a timely and targeted manner (Landwehr et al., 2025). The phenomenon of *cyberstalking* perpetrators who frequently minimize or rationalize their own conduct — a pattern extensively documented in qualitative research on intimate partner stalking perpetrators (Flowers et al., 2022) — also implies that preventive and rehabilitative strategies must be integrated into a comprehensive anti-stalking criminal policy, beyond merely strengthening criminal sanctions.

The scientific contribution offered by the present study to the development of Indonesian criminal law scholarship may be identified across at least four distinct yet interconnected dimensions. *First, normative-dogmatic contribution*: this study constitutes the first comprehensive and systematic comparative analysis between Article 493 of the National Criminal Code and two different Common Law regulatory systems — the United States (at both the federal and the California state level) and the United Kingdom — in the context of stalking, yielding the finding that the normative scope of the stalking offense under the National Criminal Code, which entered into force in January 2026, falls significantly short of the victim protection standards recognized at the global level. Unlike prior studies that have tended to stop at a descriptive identification of normative deficiencies without offering a concrete and

operational alternative formulation (Ansari & Negara, 2023), the present study takes the further step of proposing an operational *de lege ferenda* legislative formulation — a draft provision intended to govern future legal arrangements — constructed on the basis of a systematic comparative legal analysis of anti-stalking regulatory systems in Common Law jurisdictions that are more advanced and comprehensive. *Second, methodological contribution:* this study demonstrates the application of the *functional equivalence* method in comparative criminal law between Common Law and Civil Law systems — a methodologically more sophisticated approach than the simple descriptive comparison that has hitherto predominated in Indonesian criminal law literature (Al Abiad & Masadeh, 2024). This opens a pathway for the development of more critically and analytically rigorous comparative criminal law scholarship in Indonesia. *Third, policy contribution:* in the context of the National Criminal Code that has only recently entered into force, this study produces a timely *policy recommendation* insofar as the process of developing the implementing regulations of the National Criminal Code remains in its early stages. *Fourth, contribution to victimological discourse:* by explicitly integrating a victimological perspective into the analysis of the normative deficiencies of Article 493 of the National Criminal Code, this study strengthens the tradition of victim-oriented criminal law scholarship (*victim-centered criminal law scholarship*) in Indonesia — a tradition that remains comparatively underdeveloped relative to Common Law countries that have long positioned victims' rights as the primary parameter for evaluating the effectiveness of criminal justice systems. This perspective reinforces the argument that the recognition by the criminal law system of the stalking victimization experience constitutes a prerequisite for the realization of substantive justice for victims (Cho et al., 2023).

This study acknowledges a number of limitations that must be articulated in a proportionate manner in order to preserve academic integrity and to provide appropriate context for the interpretation of its findings. *The first limitation* pertains to the scope of the comparative analysis: the study compares Indonesia's legal system with only two Common Law jurisdictions — the United States, at the federal level and the state level of California, and the United Kingdom — such that the comparative conclusions produced cannot automatically be generalized to the entirety of the Common Law world. Countries with equally advanced anti-stalking legislation — such as Australia, Canada, or New Zealand — fall outside the scope of this comparative analysis due to constraints of space, despite each possessing regulatory characteristics of considerable scholarly interest (Kabiri et al., 2022). *The second limitation* is methodological in nature: as a normative legal study, this research inherently does not employ empirical field data — there are no victim surveys, no criminal data analyses, and no interviews with law enforcement practitioners. This means that the normative propositions offered have not been empirically verified with respect to the extent to which the proposed reformulated offense would effectively increase

stalking case reporting, prosecution, and conviction rates in Indonesia (Abu-Ulbeh et al., 2021). *The third limitation* pertains to the evolving dynamics of the law: given that the National Criminal Code has only recently entered into force in January 2026, no body of jurisprudence has yet emerged regarding how courts are implementing Article 493 in practice. This constrains the capacity of the present study to analyze the *implementation gap* between the normative text and judicial practice. *The fourth limitation* concerns the scope of the comparative inquiry, which is confined to the substantive dimensions of the offense, without encompassing an in-depth analysis of evidentiary mechanisms, witness protection procedures, and judicial processes — which are equally determinant factors in the effective handling of stalking cases (Storey et al., 2023). A comprehensive understanding of the entirety of the law enforcement chain — from initial reporting through to conviction — requires an inquiry that extends beyond the substantive dimensions of the offense that constitute the focus of the present study (Benuf & Azhar, 2020).

The implications and recommendations that may be derived from the present study are directed at three principal groups of stakeholders, each of which plays a distinct role within the criminal justice system as it pertains to stalking. *For legislators:* this study recommends that the House of Representatives and the Government consider amending Article 493 of the National Criminal Code through available mechanisms — whether through statutory revision, the issuance of implementing regulations, or the enactment of a dedicated anti-stalking statute — incorporating three normative components identified through comparative analysis as essential elements: (i) an expanded geographic scope encompassing public spaces, private settings, and the digital domain; (ii) explicit provisions addressing *cyberstalking* with a definition of modes of conduct that is inclusive of technological developments; and (iii) the formulation of an *objective-subjective hybrid fear standard* to ensure legal certainty for both victims and offenders. The recommended formulation model adopts the *open-ended conduct* approach of the United Kingdom's *Protection of Freedoms Act 2012* — which does not enumerate an exhaustive list of forms of stalking conduct — while simultaneously adopting the *course of conduct* requirement, which mandates a repeated pattern of behavior occurring on a minimum of two occasions, as adopted by the majority of countries in the comparative criminalization review (Van der Aa, 2018). Beyond the substantive dimensions of the offense, victim protection mechanisms in the form of *protection orders* — which are empirically demonstrated to be one of the most effective instruments for constraining perpetrator behavior, albeit with an effectiveness contingent upon the consistency of their enforcement (Cho et al., 2023) — equally require systematic regulation within Indonesia's positive law framework. *For law enforcement authorities:* this study recommends investment in the enhancement of digital investigation capacity, given that even in jurisdictions with more advanced regulation, the greatest challenge in addressing *cyberstalking* lies in investigators' ability to

collect, analyze, and present digital evidence competently — including navigating obstacles to accessing data from social media platforms and managing the complexity of digital forensic analysis (O'Shea et al., 2022). Specialized training for investigators on the dynamics of *cyberstalking* — encompassing an understanding of the latest methods employed by perpetrators, including *stalkerware*, *GPS tracking*, *doxing*, and *account takeover* — is a matter of considerable urgency, as inadequate knowledge of these methods directly contributes to dismissive law enforcement responses that are harmful to victims (Weekes et al., 2025). A thorough understanding of the psychological impact of stalking on victims also needs to be incorporated into such training, so that law enforcement authorities may respond with empathy and appreciate the urgency of preventive action before the offense escalates to physical violence (Landwehr et al., 2025). *For researchers and academics*: the present study opens several important future research agendas. First, quantitative empirical research is needed on the prevalence of *cyberstalking* in Indonesia using a nationally representative sample-based survey methodology — given that empirical data on the actual dimensions of this offense in Indonesia remain extremely limited (Abu-Ulbeh et al., 2021). Second, longitudinal jurisprudential monitoring is needed to track how Indonesian courts interpret Article 493 of the National Criminal Code in practice over time — specifically, whether courts will develop a teleologically expansive interpretation of the provision or will maintain a narrow grammatical interpretation — since these jurisprudential dynamics will be highly determinative of whether legislative reformulation is urgently required and cannot be deferred, or whether the situation may be addressed through the progressive development of judicial interpretation. Third, a broader comparative study that includes ASEAN countries with legal systems more closely aligned with Indonesia's — such as the Philippines, Vietnam, or Thailand — as contextually more relevant points of comparison is needed, so that the reformulation recommendations produced carry greater relevance to the socio-juridical realities of the region (Ansari & Negara, 2023). Fourth, research on the comparative effectiveness of criminalization approaches (*criminal law approach*) versus non-criminal approaches in addressing stalking — including mental health interventions, mediation, and restorative mechanisms — needs to be developed in order to provide an empirical foundation for a more comprehensive and holistic policy response to an offense that carries high psychological and social complexity (Flowers et al., 2022).

CONCLUSION

This comparative study affirms that Article 493 of the National Criminal Code (*Kitab Undang-Undang Hukum Pidana/KUHP*), which entered into force in January 2026, contains three structurally embedded normative deficiencies that cannot be resolved through grammatical interpretation alone: a restricted geographic scope confined exclusively to public spaces, the absence of regulatory provisions addressing

cyberstalking as an increasingly dominant mode of criminal conduct, and the failure to formulate *pattern of behavior* and *fear standard* as constitutive elements of the offense — elements that are theoretically indispensable for distinguishing criminal stalking from non-criminalized social behavior. A systematic comparison with 18 U.S. Code § 2261A, *California Penal Code* § 646.9, and the United Kingdom's *Protection from Harassment Act* 1997 as amended by the *Protection of Freedoms Act* 2012 reveals that all three Common Law instruments have addressed these normative deficiencies through inclusive offense designs that extend across all locations, are grounded in a flexible yet measurable *course of conduct* concept, and employ a *reasonable person standard* in assessing the victim's fear as an objective-hybrid threshold that guarantees legal certainty. On the basis of these comparative findings, the present study produces a *de lege ferenda* reformulation proposition that integrates all three dimensions of criminalization — stalking in public spaces, in private settings, and through electronic means — into a single cohesive, proportionate, and Civil Law-compatible offense construct for Indonesia's national criminal law system.

At the theoretical level, this study contributes to the development of the criminalization discourse in Indonesian criminal law by demonstrating that the application of the *functional equivalence* method in cross-system comparative criminal law constitutes a more productive and epistemologically sound approach than simple descriptive comparison, as it enables the identification of functionally universal elements — such as the *fear standard* and *pattern of behavior* — without becoming constrained by terminological incompatibilities between Common Law and Civil Law systems. This study equally reinforces the position of victimology as a normatively valid framework for evaluating the adequacy of a criminal offense — not merely through the dimension of perpetrator punishment, but through the parameter of the extent to which the formulation of a legal norm actively enables victims to access justice and receive recognition of their victimization experience. At the practical level, the contribution of this study takes the form of an operationally viable alternative legislative formulation that is ready to serve as legislative material for the House of Representatives or the Government in the process of developing the implementing regulations of the National Criminal Code — given that the legislative reform window within the context of this newly enacted Code remains wide open.

The future research directions recommended by this study encompass two principal and mutually complementary pathways. The *empirical* pathway calls for a nationally representative survey-based study that measures the actual prevalence of stalking offenses — both physical and online — in Indonesia, while simultaneously assessing the level of comprehension among law enforcement authorities with respect to this category of offense following the entry into force of the National Criminal Code; the findings of such empirical research would constitute an indispensable *evidence base* for legislative reform advocacy efforts. The *jurisprudential* pathway calls for longitudinal monitoring of judicial

decisions applying Article 493 of the National Criminal Code in concrete cases, with a view to identifying whether judges develop a teleologically expansive interpretation of the provision in practice or instead maintain a narrow grammatical reading — since the trajectory of jurisprudential development will be highly determinative of whether legislative reformulation is urgently required and cannot be deferred, or whether the situation may be adequately addressed through the progressive evolution of progressive judicial interpretation. The integration of both pathways will yield a considerably more comprehensive, evidence-based, and responsive roadmap for anti-stalking law reform in Indonesia — one commensurate with the increasingly complex and multidimensional nature of contemporary criminal conduct.

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