

PUBLIC ART AS CITY SYMBOL: LEGAL CHALLENGES IN COPYRIGHT AND MORAL RIGHTS PROTECTION

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Abstract

Intellectual property protection for public art installations presents a complex legal challenge when such works evolve into recognizable urban icons. This research aims to analyze the legal safeguards provided to creators of public artworks under the framework of Law Number 28 of 2014 and to evaluate the application of the principle of legal certainty in the "Urban Light" copyright dispute. Utilizing a normative legal research methodology with a focus on statutory and case approaches, this study examines the judicial reasoning within Decision No. 31/Pdt.Sus-Hak Cipta/2020/PN.Niaga.Jkt.Pst. The results demonstrate that public artworks are afforded automatic protection through the declarative principle, ensuring that their status as public symbols does not diminish the creator's exclusive moral and economic rights. Furthermore, the findings indicate that the Indonesian judiciary prioritized material truth by applying the "first to create" doctrine, which led to the cancellation of copyright registrations made in bad faith by unauthorized parties. The study concludes that achieving a reconciliation between legal certainty and substantive justice is vital for maintaining the integrity of the creative industry. These findings offer significant implications for the Directorate General of Intellectual Property in enhancing substantive verification protocols for works with established global reputations. Ultimately, this research serves as a crucial legal precedent for the protection of international artistic monuments within national jurisdictions against practices of plagiarism disguised as inspiration.

Keywords: Copyright Law, Urban Light, Public Art Protection, Legal Certainty, Intellectual Property Rights

A. INTRODUCTION

The unauthorized appropriation of public art has emerged as a pivotal discourse within the domain of intellectual property law, most notably exemplified by the legal dispute between Nancy J. Rubins, the successor of artist Chris Burden, and PT Pasti Makan Enak. At the heart of the contention is the "Urban Light" installation located at the Los Angeles County Museum of Art (LACMA), a masterpiece comprising 202 antique streetlamps that was subsequently imitated and modified to create the "Love Light" installation at the "Rabbit Town" theme park in Bandung, Indonesia. This replication was carried out without legal consent for commercial purposes, prompting a lawsuit aimed at the revocation of copyright registration and a claim for unlawful acts, as recorded in Decision No. 31/Pdt.Sus-Hak Cipta/2020/PN.Niaga.Jkt.Pst. Although "Urban Light" is internationally acclaimed as a definitive symbol of Los Angeles, its legal safeguard within the Indonesian jurisdiction encounters significant complexity when such landmark works are replicated and asserted as original inventions by other entities.

The gravity of this infringement is underscored by the dual nature of intellectual property, which encompasses both moral and economic dimensions. According to Supramono (2010), the creation of an original work is an arduous process requiring significant intellectual investment, and as such, the creator is granted exclusive rights to prevent unauthorized commercial exploitation. In the context of "Urban Light," the installation serves not only as a spiritual and aesthetic contribution to society but also as a high-value economic asset for the creator's estate (Usman, 2003). The evidence presented in the case indicates that the defendants sought to capitalize on the existing reputation of the original sculpture to attract visitors, thereby causing financial detriment and moral injury to the rightful heirs. This phenomenon reflects a broader trend in the creative economy where the boundaries of "inspiration" are often blurred by blatant plagiarism, necessitating a more rigorous application of copyright principles to protect the integrity of artistic innovations.

The Conceptual Framework of Copyright The legal classification of copyright as an intangible asset remains a fundamental pillar in intellectual property discourse. Article 499 of the Indonesian Civil Code defines property as any object or right that can be subject to ownership, which specifically includes immaterial goods such as intellectual property (Usman, 2003). Saidin (2007) argues that the paradigm of intellectual property protection must evolve alongside societal developments, emphasizing that copyright systems should be flexible enough to accommodate new artistic forms without compromising established protections. Furthermore, the dynamic nature of copyright is explicitly recognized under Law Number 28 of 2014, which characterizes it as movable property capable of legal transfer and inheritance (Usman, 2003). This conceptual framework underscores that a public work of art is not merely a physical structure but a legally protected manifestation of the creator's intellectual labor that warrants absolute protection under the law.

Analysis of Das Sein and Das Sollen A significant discrepancy often persists between the normative expectations of copyright law and its empirical application, a tension frequently described as the gap between *das sollen* and *das sein* (Mertokusumo, 1999). Theoretically, Indonesian copyright legislation provides immediate and absolute protection to any original work upon its manifestation in a tangible medium. However, the reality observed in the "Urban Light" dispute reveals a problematic gap where the commercial exploitation of globally recognized symbols occurs under the guise of inspiration or modification. This case demonstrates that while legal instruments for protection are sufficiently available, their practical enforcement is often undermined by business interests that prioritize commercial profit over the integrity of the original creator's vision. Consequently, judicial intervention becomes essential to align the factual reality of infringement with the intended legal standards of justice and certainty.

Research Gap and Objectives Despite the abundance of research on copyright infringement within the digital and musical spheres, scholarly attention regarding public art installations that have attained the status of urban symbols remains significantly limited. Most existing literature tends to prioritize software piracy or traditional literary works, thereby neglecting the unique legal complexities involved in protecting large scale sculptures and architectural structures in public spaces. This study addresses this academic void by examining the legal protections afforded to public art within the Indonesian jurisdiction, specifically through the lens of the "Urban Light" case. Therefore, this research aims to analyze the legal safeguards for creators of public icons under Law Number 28 of 2014 and to evaluate the application of the principle of legal certainty within the court decisions associated with this monumental dispute.

C. RESEARCH METHODOLOGY

This study employs a qualitative research design, specifically normative legal research, which focuses on an in-depth analysis of positive legal norms and relevant legal doctrines. In accordance with the perspective of Marzuki (2019), the methodology incorporates a statutory approach to examine the consistency of copyright regulations, as well as a case approach to dissect the ratio decidendi within Decision No. 31/Pdt.Sus-Hak Cipta/2020/PN.Niaga.Jkt.Pst. Utilizing this method enables the researcher to identify legal lacunae or ambiguities regarding the protection of public art, while simultaneously evaluating how legal principles are concretely applied by judicial institutions within the context of international intellectual property disputes.

The data utilized in this research is derived entirely from secondary sources, which are classified into three primary categories of legal materials. Primary legal materials consist of authoritative instruments such as Law Number 28 of 2014 concerning Copyright, the Indonesian Civil Code, and official court records spanning from the court of first instance to the final judicial review. Secondary legal materials encompass academic literature, legal journals, and theoretical insights from scholars such as Saidin (2007) and Usman (2003), who provide the conceptual foundations for the exclusive nature of copyright. Meanwhile, tertiary legal materials, including legal dictionaries and encyclopedias, are employed to provide clarification on technical judicial terminology (Soekanto & Mamudji, 2014). Data collection was conducted through a systematic literature review to ensure that all pertinent legal materials were comprehensively integrated into the analytical process.

Data analysis was performed qualitatively using a descriptive analytical method to provide a comprehensive and systematic overview of the legal protection afforded to creators of public art. The legal reasoning process was executed through deductive logic, whereby the general norms contained within copyright regulations were confronted with the specific legal facts of the "Urban Light" case to generate prescriptive conclusions (Marzuki, 2013). To ensure the validity and reliability of the research findings, the researcher implemented a triangulation technique of legal materials involving a cross examination of statutory texts, scholarly opinions, and judicial practices. This procedure ensures that the constructed legal arguments maintain a high degree of consistency and meet the rigorous academic credibility standards required in qualitative legal research.

D. RESULT AND DISCUSSION

Legal Protection for Creators of Public Art as Urban Symbols under Law Number 28 of 2014

Law is essentially a collection of regulations that govern order within society and must be obeyed to ensure certainty and justice (Kansil, 2002). Within the realm of intellectual property, copyright is classified as an intangible movable asset that grants exclusive rights to its creator (Soebekti & Tjitrosudibio, 2012). Theoretically, this protection arises automatically from the moment a creation is manifested in a tangible form; however, empirical problems frequently emerge when public artworks, such as "Urban Light," are perceived as common property after achieving the status of an urban symbol. This discrepancy creates a loophole for business entities to replicate such works without authorization, under the pretext that works situated in open spaces can be accessed and imitated freely for commercial interests.

The research findings indicate that originality serves as the primary foundation in determining the validity of legal protection for a public work of art. Based on Article 40 Paragraph (1) Letter g of Law Number 28 of 2014, artworks in the form of sculptures or statues receive highly specific

legal safeguards. Saidin (2013) emphasizes that copyright protection does not require registration for the right to exist, as it operates on a declarative principle. An analysis of the "Urban Light" installation confirms that the work possesses unique aesthetic and novelty elements that distinguish it from other creations. Therefore, its replication as "Love Light" constitutes a disregard for the principle of originality recognized internationally, even though the work is displayed in a public space accessible to all.

Regarding the dimension of moral rights, the analysis reveals a violation of the work's integrity and the creator's right to attribution. Moral rights are rights that are eternally attached to the creator, ensuring their name is credited and protecting the work from detrimental modifications (Djumhana & Djubaedillah, 2003). The findings in this dispute show that the Defendant not only replicated the physical form of the installation but also failed to respect the moral rights of Chris Burden's heirs by claiming the creation as their own. Pursuant to Article 5 of Law Number 28 of 2014, any modification carried out without consent is an unlawful act that damages the artistic dignity of the original creator. This reinforces the principle that the status of a work as a city icon does not abolish the obligation of other parties to respect the identity of its original creator.

In the dimension of economic rights, research findings demonstrate unauthorized commercial exploitation that financially disadvantages the copyright holder. Economic rights authorize the creator to derive financial benefits through the reproduction, announcement, or distribution of their creation (Supramono, 2010). In the case of "Love Light," the use of the replicated artwork in a tourist park aimed to enhance visitor appeal and generate material profit for the management. The indicator of infringement is evident as the Defendant commercialized a work with substantial similarity to "Urban Light" without following proper licensing procedures or paying valid royalties. This analysis aligns with the view of Usman (2003) that any use of a work for commercial purposes must obtain written consent from the creator to ensure economic justice.

The final finding pertains to the enforcement of legal certainty through the cancellation of copyright registrations made in bad faith. Although the registration system is administrative, recordings based on plagiarism must be declared null and void to protect the rightful creator. Mertokusumo (1999) states that the function of law is to provide protection for human interests, which in this context refers to the protection of intellectual creativity. Analysis of the court decision reveals that the copyright registration in the Defendant's name was cancelled because it was proven to violate the principles of novelty and good faith in registration (Kusumaningrum, 2016). Consequently, the legal mechanism in Indonesia provides a guarantee that the protection for public artworks that have become urban symbols remains steadfast upon the principles of material truth and justice for the original creator.

Application of the Principle of Legal Certainty in Judicial Decisions Concerning the "Urban Light" Copyright Dispute

The principle of legal certainty serves as a fundamental objective of law, requiring that regulations be formulated in a clear, logical, and unambiguous manner to provide essential protection for legal subjects. According to Mertokusumo (1984), legal certainty is not merely a matter of applying statutory regulations but also involves safeguarding individuals against arbitrary actions. In an empirical context, the "Urban Light" dispute tests the consistency of judicial institutions in providing certainty for foreign copyright holders whose works are replicated within Indonesia. Complexity arises when there is an overlap between the administrative recording of copyright by unauthorized parties and the original rights held by the actual creator, which demands judicial decisiveness in upholding justice through decisions rooted in legal certainty.

The research findings indicate that the application of the principle of legal certainty in Decision No. 31/Pdt.Sus-Hak Cipta/2020/PN.Niaga.Jkt.Pst is reflected in the judges' consistency in applying the "first to create" principle rather than "first to file." These findings demonstrate that the judges did not merely rely on formal evidence in the form of the copyright registration certificate held by the Defendant, but instead investigated the material truth regarding the actual identity of the creator. Based on the theory of normative legal research, the judges utilized a case approach to ensure that legal protection is not granted to parties who register works in bad faith (Ibrahim, 2008). This approach provides certainty to artists that the Indonesian legal system protects their work substantively, despite attempts by other parties to seek formal legitimacy through manipulative registration.

Within the dimension of normative enforcement, the research reveals that the cancellation of the Defendant's copyright registration constitutes a form of preventive and repressive protection consistent with the Copyright Law. The indicator of legal certainty is evident when the judges declared that the recording of a creation by the Directorate General of Intellectual Property is purely administrative and does not grant absolute ownership rights if a violation of another party's rights is discovered. Marzuki (2013) explains that the study of court decisions aims to examine whether the legal considerations of the judges align with logical legal reasoning. In this case, the decision to cancel the "Love Light" registration was based on the legal fact that the work was an identical imitation, thereby providing certainty that moral and economic rights remain with Chris Burden's heirs as the legally rightful party.

Furthermore, the findings regarding the imposition of damages demonstrate an effort toward equitable restitution for the plaintiff. Legal certainty requires judicial consequences for parties who commit unlawful acts, as regulated in the Indonesian Civil Code (Soebekti & Tjitrosudibio, 2012). The analysis shows that the awarding of damages in this decision functions not only as material compensation but also as a deterrent effect for other business entities against committing similar acts. The application of justice theories in this ruling proves that legal certainty must not be separated from utility, where the protection of an international urban icon is recognized equally with domestic works in accordance with the principle of national treatment in international conventions (Saidin, 2013).

The final finding in this analysis highlights the importance of integrating international legal facts with national jurisdiction to achieve comprehensive legal certainty. In their considerations, the judges recognized the reputation of "Urban Light" as a monumental work widely known to the global public long before "Love Light" was registered in Indonesia. This finding is supported by indicators suggesting that legal certainty must be predictive, meaning a creator can be confident that their work will remain protected regardless of where it is displayed (Mertokusumo, 1999). By confirming Nancy J. Rubins' victory from the cassation level to the judicial review, the Indonesian judiciary has demonstrated a commitment to upholding legal certainty for global intellectual property, while simultaneously closing the space for plagiarism practices shielded by national administrative procedures.

DISCUSSION

Juridical Analysis of the Boundaries of Public Art Protection and the Doctrine of Originality

The discussion regarding the boundaries of public art protection in the "Urban Light" dispute necessitates a profound understanding of the nature of copyright as an intangible movable asset. According to the legal classification of property, copyright constitutes an exclusive right that grants absolute authority to the creator to control their intellectual output (Soebekti & Tjitrosudibio, 2012). The justification for this protection remains valid even when a work of art has transformed into an urban symbol displayed in an open space. Saidin (2013) asserts that legal protection is not diminished simply because a creation is enjoyed by the public at large, as the essence of such protection lies in the legal relationship between the creator and their intellectual labor, rather than the physical localization of the work. Consequently, the empirical view that treats public art as being in the public domain is a juridical fallacy that overlooks the fundamental principles of intellectual property law.

The doctrine of originality serves as the primary pillar in determining whether a work warrants protection or constitutes a form of plagiarism. According to Djumhana and Djubaedillah (2003), originality in copyright does not demand absolute novelty as seen in patent regimes, but rather the presence of a "spark of creativity" or an intellectual manifestation that demonstrates the work originated independently from the creator's will. In the context of "Urban Light," the authenticity of Chris Burden's work lies in its aesthetic composition and the specific arrangement of antique lamps that create a unique visual identity. Conversely, the presence of "Love Light" in Rabbit Town, which substantially replicates these visual elements, demonstrates a lack of originality. This analysis reinforces that the replication carried out by the Defendant is not a form of inspiration but rather an attempt to appropriate economic and aesthetic value without contributing any new intellectual substance.

Furthermore, this discussion addresses the limitations of exclusive rights, which are frequently misunderstood in the practice of creative tourism. Although Law Number 28 of 2014 acknowledges limitations on copyright for educational purposes or non-commercial exhibitions, the use of replicated artworks for commercial gain in tourist parks constitutes a severe violation of economic rights. Supramono (2010) explains that any exploitation of an artwork intended for financial profit must obtain permission from the rights holder to ensure justice for the creator. The replication of "Urban Light" into "Love Light" without legally valid licensing procedures has infringed upon the economic rights of the heirs, as the commercial value of the original work's reputation was unlawfully transferred for the Defendant's benefit. This demonstrates that legal protection boundaries must be strictly enforced to prevent commercial hegemony that disregards the ethics of intellectual property.

The integration of moral and economic rights in public artworks is also a crucial point in this discourse. Moral rights guarantee that the creator's name remains attached and that the work cannot be altered arbitrarily (Usman, 2003). In this dispute, the Defendant not only violated economic rights through physical replication but also injured the artistic integrity of the creator by presenting it as a new creation without proper attribution to Chris Burden. Sudikno Mertokusumo (1999) states that the law exists to protect human interests, and in this regard, artistic integrity is a part of the creator's human dignity that the state must protect. The Defendant's failure to respect these moral boundaries proves that copyright enforcement in Indonesia is not only concerned with material losses but also with the protection of artistic striving and values.

In concluding the analysis of this subsection, it is vital to reflect on how the doctrine of originality and the boundaries of public art protection function to create legal certainty. Kansil

(2002) argues that legal certainty is the foundation for establishing order in relations between legal subjects. Through the court decision favoring the "Urban Light" party, the Indonesian legal system sends a firm message that the status of a work as a global icon actually strengthens its protection against plagiarism. The enforcement of the originality doctrine becomes a crucial precedent so that business entities can no longer hide behind the pretext of using public space to legitimate unlawful acts. Thus, this juridical analysis confirms that protection for creators of public art is absolute, provided the work fulfills the element of originality and remains within the protection period guaranteed by law.

Reconciliation of Legal Certainty and Justice in the Judicial Decision of the "Urban Light" Dispute

The reconciliation between legal certainty and justice remains a fundamental challenge for judges when adjudicating intellectual property disputes involving international reputations. The research findings regarding the application of the principle of legal certainty in the "Urban Light" decision indicate that judicial institutions in Indonesia are increasingly adopting a more progressive approach to legal discovery (*rechtsvinding*). According to Mertokusumo (1984), legal certainty should not be viewed rigidly as mere compliance with statutory texts but must instead reflect substantive justice for all parties involved. In this case, the judges successfully harmonized legal certainty for Chris Burden's heirs by rendering a decision that cancelled the Defendant's copyright registration, which was proven to be based on bad faith. This move reinforces the principle that legal certainty in Indonesia does not provide space for the legitimacy of administrative formalities that injure the substantive rights of the original creator.

The discussion regarding the role of the Ministry of Law and Human Rights as a Co-Defendant highlights the critical importance of accountability within the copyright administration system. Although the registration system in Indonesia is declarative in nature, its effectiveness depends entirely on the validity of the data submitted by the applicant. Legal certainty, from the perspective of Marzuki (2013), necessitates legal protection against arbitrary actions that may arise from administrative errors. The cancellation of the "Love Light" registration by the court provides a justification that the state has a legal obligation to correct any recording of a creation that violates the originality of another's work. This demonstrates that legal certainty within the copyright regime must be dynamic, where protection is granted to the party that is materially correct rather than simply the party that was the first to file a formal registration.

Viewed from the perspective of justice, the imposition of damages and the order to demolish the replicated installations constitute a highly significant form of rights restoration. Justice in copyright law demands a balance between the interests of the creator and the utilization of the work by the public; however, this must not sacrifice the creator's economic rights for the commercial gain of third parties. Supramono (2010) argues that legal protection must be capable of providing a deterrent effect for violators of intellectual property rights. The justification for these sanctions indicates that the commercial court does not only function as a dispute resolution institution but also as a guardian of the creative industry's integrity. The enforcement of justice through damages proves that any form of intellectual appropriation against an international urban symbol carries real legal consequences within the Indonesian jurisdiction.

Furthermore, this discussion highlights how the court decision reflects Indonesia's compliance with international protection standards, specifically the TRIPS Agreement and the Berne Convention. The principle of national treatment requires that foreign creators receive protection equal to that of domestic creators within Indonesian territory. Saidin (2013) emphasizes that the integration of national law with international norms is a prerequisite for creating a healthy

climate for investment and creativity. By ruling in favor of Nancy J. Rubins, the judiciary has proven that the Indonesian legal system is capable of providing legal certainty for global artworks that have become public icons. This discussion confirms that international legal certainty and domestic justice can operate in tandem if judges are able to recognize the essence of originality as a universal value that must be protected beyond the boundaries of national sovereignty.

In conclusion, the synchronization between legal certainty and justice in the "Urban Light" case provides a powerful precedent for the future protection of public art. Soekanto (2008) states that effective law enforcement must be supported by public legal awareness and the firmness of law enforcement agencies. This decision does not only resolve a dispute between two specific parties but also serves as a guideline for tourism business entities to be more cautious when utilizing artworks as commercial objects. The reconciliation achieved through this ruling proves that the law in Indonesia is capable of acting responsively toward the dynamics of modern plagiarism, thereby ensuring that protection for creators of public artworks remains firmly established upon the foundations of morality, economy, and absolute juridical certainty.

E. CONCLUSION

Based on the research findings and the comprehensive legal analysis presented, this study concludes that legal protection for creators of public artworks that have attained the status of urban symbols is both automatic and absolute under the declarative principle of Law Number 28 of 2014. The findings emphasize that the transformation of a work into a public icon does not relinquish the creator's exclusive moral and economic rights. This protection fundamentally encompasses the right to preserve the work's integrity against unauthorized modifications and the right to derive economic benefits from its commercial exploitation. The "Urban Light" case demonstrates that even when a work is permanently situated in a public space, any unauthorized replication remains a legally actionable infringement that violates the originality and artistic dignity of the original creator.

Furthermore, the application of the principle of legal certainty in the judicial decisions concerning this dispute was effectively upheld through the prioritization of material truth over administrative formalities. The judicial determination to cancel the Defendant's copyright registration underscores that the Indonesian legal system provides robust certainty for legitimate copyright holders by adhering to the "first to create" principle. This approach successfully reconciles the requirements of legal certainty with substantive justice, ensuring that administrative registration procedures are not manipulated to legitimize plagiarism. By upholding the ruling through the final stages of judicial review, the Indonesian judiciary has affirmed its commitment to protecting global intellectual property in accordance with international standards, while simultaneously closing legal loopholes that allow for the misuse of state administrative processes for bad-faith commercial gain.

This research acknowledges several limitations, primarily its focus on a single monumental case study, which may necessitate broader comparative frameworks for smaller-scale public art disputes in future studies. Additionally, the study has not extensively addressed the practical complexities of enforcing compensation mechanisms following a final court decision. Consequently, future research should investigate the protection of public art within evolving digital ecosystems and advanced three-dimensional replication technologies, which present significant challenges to the traditional doctrine of originality. For policymakers, it is suggested that the Directorate General of Intellectual Property strengthens its substantive verification protocols for

copyright applications involving works recognized as public icons to prevent similar disputes and enhance the overall integrity of the national intellectual property regime.

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