

The Doctrine of Unlawful Acts in E-Commerce Consumer Protection

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ABSTRACT

The development of digital technology has driven an increase in transactions through e-commerce platforms. However, this dynamic has also given rise to various violations of consumer rights, such as fraud, goods not as described, and misuse of personal data. This study aims to analyze the application of the doctrine of unlawful acts (PMH) in resolving disputes regarding consumer rights violations on e-commerce platforms. The method used is normative legal research with a statutory, conceptual, and case-based approach. The results show that the elements of PMH as stipulated in Article 1365 of the Civil Code can be applied to cases of consumer rights violations, whether committed by business actors or third parties. Furthermore, developments in jurisprudence have broadened the definition of PMH, allowing consumers to claim compensation not only when there is a violation of the law, but also when business actors act contrary to the principles of propriety, morality, and good faith. Thus, the PMH doctrine can be an important instrument in consumer protection in the digital era, although more stringent specific regulations regarding e-commerce are still needed.

ABSTRAK

Perkembangan teknologi digital telah mendorong meningkatnya transaksi melalui platform e-commerce. Namun, dinamika ini juga memunculkan berbagai pelanggaran terhadap hak konsumen, seperti penipuan, barang tidak sesuai deskripsi, hingga penyalahgunaan data pribadi. Penelitian ini bertujuan menganalisis penerapan doktrin perbuatan melawan hukum (PMH) dalam menyelesaikan sengketa pelanggaran hak konsumen di platform e-commerce. Metode yang digunakan adalah penelitian hukum normatif dengan pendekatan perundang-undangan, konseptual, dan kasus. Hasil penelitian menunjukkan bahwa unsur-unsur PMH sebagaimana diatur dalam Pasal 1365 KUHPerdata dapat diterapkan pada kasus pelanggaran hak konsumen, baik yang dilakukan oleh pelaku usaha maupun pihak ketiga. Lebih lanjut, perkembangan yurisprudensi memperluas pengertian PMH, sehingga konsumen dapat menuntut ganti rugi tidak hanya ketika terjadi pelanggaran undang-undang, tetapi juga apabila pelaku usaha bertindak bertentangan dengan asas kepatutan, kesusilaan, dan itikad baik. Dengan demikian, doktrin PMH dapat menjadi instrumen penting dalam perlindungan konsumen pada era digital, meskipun masih diperlukan regulasi khusus yang lebih tegas terkait e-commerce.

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1. Introduction

Digital technology's evolution during globalization has transformed human interaction, communication, and daily transactions. E-commerce platforms represent one of the most prominent innovations, generating substantial effects on national and international economies. Indonesia, with its large population and rising internet penetration, has become one of Southeast Asia's largest e-commerce markets (Katadata, 2025). Multiple reports indicate that e-commerce transaction values in Indonesia grow rapidly each year, reaching hundreds of trillions of rupiah, with projections suggesting continued increases as digital infrastructure develops and technology-based lifestyles gain wider adoption. Such phenomena signal not only shifts in consumption patterns but also introduce novel legal dynamics. Where past

transactions occurred through face-to-face encounters, current exchanges complete within minutes without physical contact. While offering efficiency and convenience, these circumstances create opportunities for various consumer-rights violations. Numerous cases reveal goods failing to match descriptions, delayed shipments, damaged products, and fraudulent practices causing material and immaterial harm (Bisnis.com, 2023). More serious issues emerge through unauthorized use of consumer personal data for business purposes or cybercrime.

In Indonesia, consumer protection receives statutory recognition through Law Number 8 of 1999 on Consumer Protection. The legislation establishes strong legal foundations regarding consumer rights—rights to comfort, security, and safety when consuming goods or services; rights to accurate information; rights to choose; and rights to compensation for losses. Business actors, conversely, bear obligations to act in good faith, provide truthful information, and guarantee the quality of marketed goods and services. Yet digital-world developments generate problem forms not always adequately addressed by such statutory provisions. E-commerce practice typically presents standard-form electronic contracts imposed unilaterally, where consumers receive only binary choices—accept or reject—without negotiation space. Such conditions place consumers in weak positions, rendering them vulnerable to detrimental clauses (Nugroho, 2021). Examples include clauses limiting business-actor liability or even imposing entire risks upon consumers. When such arrangements cause losses, consumers require robust legal foundations for claiming compensation.

Here the unlawful-act (PMH) doctrine assumes critical importance. Article 1365 of the Civil Code states: "Every unlawful act that causes damage to another person obliges the person whose fault caused the damage to compensate for it." The provision grants broad scope for victims—in these cases, consumers—to claim compensation even when business-actor conduct receives no express statutory regulation. PMH can therefore serve as legal grounds for asserting consumer rights in e-commerce transactions (Munir Fuady, 2019). PMH's meaning within Indonesian legal practice has undergone significant development. Initially, PMH encompassed only violations of statutory regulations. However, through Supreme Court Decision Number 31 K/Sip/1969, the definition expanded to include acts violating others' subjective rights, contradicting actors' legal obligations, opposing moral norms, or contravening propriety principles in society (Yurisprudensi Mahkamah Agung, 1969; Puslitbang Hukum dan Peradilan MA RI, 2024). Such expansion provides stronger juridical foundations for consumers pursuing their rights when facing digital-realm violations.

Applying PMH within e-commerce settings carries high urgency, given digital-transaction complexity often involving parties from multiple jurisdictions. Consumers occupy vulnerable positions due to information limitations, weak bargaining power, and minimal access to dispute-resolution mechanisms. Conversely, business actors frequently hold stronger financial and structural positions, enabling them to exploit such imbalances for greater profits. Under these circumstances, PMH's existence as a flexible legal instrument can deliver fairer consumer protection (Rachmadi Usman, 2020). Additionally, personal-data protection problems constitute crucial issues in e-commerce transactions. Consumer personal data frequently undergoes collection, processing, even trading without data owners' knowledge or consent (Putri, 2023). Such actions harm consumers not merely economically but potentially threaten individual privacy and security. In Indonesia, personal-data protection regulation remains under development, making PMH application highly relevant as legal grounds for claiming compensation from data misuse.

From academic perspectives, studies examining PMH doctrine application within consumer-rights violations in e-commerce remain relatively scarce. Many researchers emphasize consumer-protection aspects based on Consumer Protection Law, while PMH often escapes primary focus. Yet PMH doctrine's flexibility offers substantial

opportunities for addressing legal challenges in the digital era. Accordingly, the present study aims to provide deeper understanding regarding PMH application within e-commerce settings, while offering fresh perspectives for strengthening consumer protection (Dewi, 2022). Furthermore, the research should yield practical contributions for policymakers formulating more specific regulations regarding consumer protection in the digital age. Although PMH can serve as legal grounds for claiming compensation, electronic-transaction complexity demands more detailed special regulations, particularly concerning personal-data protection, electronic contracts, and online dispute-resolution mechanisms (European Union, 2016; Setiawan, 2024). With clearer regulations, consumers receive optimal protection while business actors operate with better legal certainty. These entire expositions demonstrate that e-commerce development has opened new trade opportunities while generating significant legal challenges. Therefore, research examining unlawful-act doctrine application within consumer-rights violation settings becomes essential. The study benefits not only civil-law development but also carries practical implications for promoting fair, transparent, and sustainable digital-commerce ecosystems.

2. Methodology

This research employs a normative legal approach, focusing on legal norms, regulations, and prevailing doctrines. The method selection stems from research objectives examining unlawful-act doctrine application in consumer-rights violation cases on e-commerce platforms. Since the study prioritizes regulatory, doctrinal, and jurisprudential analysis over empirical field data, the normative approach proves most appropriate (Soerjono Soekanto & Sri Mamudji, 2015).

In normative legal research, primary sources comprise relevant legislation, including the Civil Code—particularly Article 1365 on unlawful acts—Law Number 8 of 1999 on Consumer Protection, and regulations governing electronic transactions and personal data protection. Secondary legal materials encompass legal literature, textbooks, academic articles, and scholarly journals discussing unlawful-act concepts and consumer protection in the digital era (Munir Fuady, 2019; Rachmadi Usman, 2020). Tertiary legal materials derive from legal dictionaries, encyclopedias, and supplementary sources providing additional understanding of employed terms and concepts. Court decisions, particularly Supreme Court rulings expanding unlawful-act meanings, constitute crucial analytical materials (Yurisprudensi Mahkamah Agung, 1969; Puslitbang Hukum dan Peradilan MA RI, 2024). Case analysis includes examination of District Court decisions addressing electronic transaction fraud and e-commerce delivery disputes (Rusmiyanto, 2019; Selvitri *et al*, 2023).

Data collection proceeds through library research methods. All regulations, literature, and court decisions undergo systematic examination to identify connections between unlawful-act doctrine and consumer-rights violation practices in e-commerce. The process enables deeper comprehension of how existing norms apply to concrete cases, especially when violations occur in forms not explicitly regulated by statute (Peter Mahmud Marzuki, 2017). Particular attention addresses emerging issues such as counterfeit goods in digital marketplaces and false testimonials in e-commerce transactions (Lihua *et al*, 2025; Zuleika *et al*, 2024). Additionally, the study examines personal data protection frameworks under Information and Electronic Transaction Law and proposed Personal Data Protection regulations (Putri, 2023).

Collected data undergoes qualitative analysis through descriptive-analytical methods. Data receives systematic exposition before analysis to address research problems. Analysis compares prevailing norms, legal scholars' perspectives, and judicial practices, particularly Supreme Court decisions broadening unlawful-act

meanings. This approach demonstrates classical PMH doctrine relevance to novel legal issues arising from digital technology development (Nugroho, 2021). The analytical framework incorporates comparative examination of international standards, including European Union data protection regulations, to contextualize Indonesian consumer protection within global best practices (European Union, 2016). Furthermore, analysis considers effectiveness of Consumer Dispute Settlement Bodies (BPSK) in resolving e-commerce consumer disputes, identifying procedural and substantive challenges (Setiawan, 2024).

To maintain research validity, source triangulation methods apply. Each finding receives confirmation through various legal sources—regulations, academic literature, and court decisions. The approach ensures analyses avoid partiality while reflecting more comprehensive legal perspectives (Johnny Ibrahim, 2006). Moreover, the research adopts critical analysis of PMH doctrine by considering digital transaction dynamics, ensuring drawn conclusions remain relevant to contemporary consumer protection needs. The analytical process examines platform digital accountability toward consumer violations, exploring liability frameworks applicable to marketplace operators and sellers (Dewi, 2022).

This methodology aims to provide academic and practical foundations strengthening consumer legal protection. Research results should contribute not only theoretical advancement in civil law scholarship but also practical application in consumer dispute resolution on e-commerce platforms. Accordingly, the methodology supports research capable of addressing complex legal issues while offering regulatory recommendations for policymakers. The study seeks to bridge doctrinal analysis with practical implementation, ensuring unlawful-act principles effectively protect consumers navigating digital marketplace complexities.

3. Results

This research finds that consumer-rights violations on e-commerce platforms constitute real and systematic phenomena, reflected in annually increasing consumer complaint numbers. Ministry of Trade data records 20,942 consumer complaints from 2022 through March 2025, with 92% originating from e-commerce transactions, representing approximately 19,428 cases. These figures demonstrate that most consumer problems currently stem from digital buying-selling practices, making consumer protection in e-commerce contexts urgent legal issues requiring deeper examination (Katadata, 2025). Research results also reveal that most frequent consumer complaints relate to fund returns or refunds. Indonesian Consumer Foundation (YLKI) reports from 2023 record that 23.4% of e-commerce consumer complaints involve refund difficulties. Consumers complain that when received goods prove damaged, defective, or inconsistent with orders, fund-return processes proceed slowly, circuitously, or even fail implementation by business actors or platforms. These problems harm consumers not merely financially but also generate lost trust in digital commerce mechanisms (Bisnis.com, 2023).

Additionally, fraud through misleading information delivery constitutes significant problems. In numerous cases, consumers receive goods whose quality falls far below descriptions, even differing entirely from images displayed in e-commerce catalogs. One study discovers that business actors frequently employ authentic product photographs to market counterfeit goods, causing consumers to feel deceived after receiving goods (Lihua *et al*, 2025). More extreme cases appear in Masamba District Court Decision Number 185/Pid.Sus/2014, where defendants opened buying-selling websites and advertised electronic goods at low prices, yet after payments occurred, goods never shipped. Courts declared such actions constitute electronic transaction

fraud causing real consumer losses (Rusmiyanto, 2019).

Other frequent problems involve delivery delays or even shipment failures. Dispute cases between PT Digital Commerce Indonesia and PT Andiarta Muzizat (Ninja Xpress) under case number 151/Pdt.G/2020/PN JKT.SEL demonstrate how logistics operators as e-commerce ecosystem components can generate substantial consumer losses. In those proceedings, courts determined defendants must compensate material losses reaching Rp13.3 billion for failing to fulfill timely goods-delivery obligations. These cases confirm consumers occupy vulnerable positions when business actors and third parties neglect their obligations (Selvitri *et al*, 2023). This research also discovers that electronic contracts employed in e-commerce frequently possess standard and unilateral characteristics. Consumers can only approve terms and conditions established by platforms without negotiation space. Clauses limiting business-actor liability or transferring entire risks to consumers constitute violations of propriety and balance principles in contract law. These situations render consumers increasingly vulnerable to losses because legally they lack equal bargaining positions.

Beyond that, consumer personal data misuse occurs increasingly frequently. Massive data breach cases from one of Indonesia's largest e-commerce platforms in 2020, resulting in millions of consumer accounts being traded on international online forums, exemplify that consumer privacy rights remain suboptimally protected. Generated losses encompass not merely financial threats such as fraud potential and identity theft but also lost security feelings in digital transactions. Until now, specific regulations governing consumer personal data protection remain relatively new and not yet fully effective, making unlawful-act doctrine application one alternative for consumers pursuing compensation claims.

False testimonials and misleading reviews also constitute research findings. Many consumers purchase products based on positive testimonials that prove false or paid by business actors to increase sales. Research from Raden Intan State Islamic University Lampung confirms that false testimonials in e-commerce can generate real losses because consumers make purchasing decisions based on incorrect information (Zuleika *et al*, 2024). These practices clearly contradict consumer rights to obtain truthful, honest, and clear information as regulated in Consumer Protection Law.

By combining quantitative data findings and case studies, this research confirms that consumer-rights violations in e-commerce constitute not incidental phenomena but systemic problems requiring serious attention. High complaint numbers, recurring difficult-refund cases, digital fraud practices, and personal data misuse demonstrate that consumers still occupy weak positions. These conditions strengthen unlawful-act doctrine relevance as legal foundations consumers can employ to pursue their rights when experiencing losses from business-actor actions on e-commerce platforms.

4. Discussion

Unlawful-act (PMH) doctrine application in consumer-rights violation contexts on e-commerce platforms constitutes one important instrument bridging normative vacuums not yet explicitly regulated by specific legislation. Based on Civil Code Article 1365, PMH encompasses five principal elements: act existence, unlawful character, fault, loss, and causal relationships between acts and arising losses. In e-commerce contexts, these elements appear in various violation forms such as digital fraud, refund difficulties, personal data misuse, and false testimonial dissemination misleading consumers.

4.1 Advantages of PMH Doctrine Application in E-Commerce

The primary advantage of PMH doctrine application lies in its flexibility. PMH ensnares not merely acts explicitly prohibited by legislation but also actions contradicting propriety principles, morality, and good faith. This aligns with Supreme

Court Decision Number 31 K/Sip/1969 expanding "unlawful" meanings beyond written regulation violations to encompass moral norms and societal propriety. Consequently, PMH adapts to new violation forms emerging in digital practices, including online platform-based fraud and data privacy violations. Moreover, PMH provides legal foundations for consumers pursuing compensation without awaiting specific regulations on digital consumer protection. In situations where sectoral regulations cannot yet reach electronic transaction complexities, PMH becomes bridging mechanisms guaranteeing justice for harmed parties. This doctrine also strengthens weak consumer positions against large business actors possessing superior economic power and information.

4.2 Limitations and Challenges of PMH Application

Nevertheless, PMH application in e-commerce contexts possesses several limitations. First, evidentiary difficulties frequently constitute primary obstacles. In digital transactions, perpetrator identities often remain unclear, particularly when perpetrators employ anonymous accounts or foreign servers. Second, causal relationships between acts and losses prove difficult to establish, especially in personal data breach cases or advertising algorithm misuse. Third, PMH-based litigation processes in civil courts consume relatively long periods and high costs, rendering them ineffective for cases involving small loss values. Additionally, PMH doctrine lacks comprehensive digital legal instruments. Consumer Protection Law Number 8 of 1999 and Information and Electronic Transaction (ITE) Law still fail to specifically regulate digital platform responsibilities toward user-committed violations. Consequently, numerous e-commerce consumer disputes remain unaddressed effectively due to absent rapid and affordable resolution mechanisms.

4.3 Comparisons with Other Consumer Protection Mechanisms

Compared with other consumer protection mechanisms such as dispute resolution through Consumer Dispute Settlement Bodies (BPSK) or administrative protection by Ministry of Trade, PMH possesses more judicial character based on individual responsibility. BPSK, for instance, emphasizes mediation and arbitration within certain value limits, thus cannot always address complex cases such as personal data violations or cross-border fraud. In international practice, legal frameworks such as General Data Protection Regulation (GDPR) in European Union or Consumer Rights Act in United Kingdom offer stronger protection through strict liability principles and administrative sanctions. These systems differ from Indonesian PMH still oriented toward fault-based liability. These comparisons demonstrate that Indonesia requires strengthened digital consumer protection regulations aligning with global standards, for instance by adding provisions regarding shared responsibility between business actors and service-providing platforms.

4.4 Relevant Jurisprudence Analysis

Several national jurisprudences demonstrate PMH application in digital consumer disputes. South Jakarta District Court Decision Number 151/Pdt.G/2020/PN JKT.SEL between PT Digital Commerce Indonesia and PT Andiarta Muzizat (Ninja Xpress), for example, confirms that goods delivery delays constitute negligence forms generating material losses and belonging to unlawful-act categories. Similarly, Masamba District Court Decision Number 185/Pid.Sus/2014 assesses that electronic transaction fraud through false advertising can qualify as violations fulfilling PMH elements. Additionally, new jurisprudence trends exist in personal data breach cases, where courts increasingly recognize immaterial losses from privacy violations. Surabaya District Court Decision in 2022, for instance, states that platform operators can bear responsibility when negligent in protecting user data, even without direct involvement in data misuse. This demonstrates courts increasingly progress in interpreting "unlawful" elements in digital contexts.

4.5 Analytical Synthesis

Theoretically, PMH possesses strategic roles as adaptive legal instruments toward technological developments. It provides bridges between classical civil law norms and new electronic transaction realities. However practically, its effectiveness still depends on law enforcement consistency, judicial institution capacity, and societal legal literacy. Therefore, more specific law strengthening regarding e-commerce platform responsibilities and digital compensation mechanisms proves necessary. Moving forward, PMH application can integrate with regulation-based preventive approaches, such as algorithm transparency obligations, stronger personal data protection, and online dispute resolution systems. Combinations between normative and regulative approaches hopefully provide more comprehensive legal protection for consumers in digital economy era.

5. Conclusion

This research concludes that unlawful-act (PMH) doctrine application possesses very strong relevance in consumer-rights protection contexts on e-commerce platforms. High consumer complaint numbers, which according to Ministry of Trade data reach 20,942 cases from 2022 through March 2025 with 92% originating from e-commerce transactions, demonstrate that consumer violations in digital transactions constitute not incidental phenomena but systemic problems requiring serious attention. Research results discover various recurring consumer violation forms, including refund difficulties, misleading advertising, transaction fraud, goods delivery delays or failures, personal data misuse, unilateral electronic contracts, and false testimonials. All these cases can be analyzed using PMH frameworks encompassing act elements, unlawful character, fault, loss, and causal relationships. Both active acts such as false advertising placement and negligence such as delivery delays can qualify as PMH when generating consumer losses. Losses experienced by consumers possess not merely material character, such as money loss from failed refunds or counterfeit goods purchases, but also immaterial forms including lost security feelings, reputation damage, and legal uncertainty. Personal data breach cases on one of Indonesia's largest e-commerce platforms in 2020 constitute real evidence of immaterial losses potentially implying long-term consequences for consumers.

Normatively, PMH application in e-commerce contexts aligns with civil law developments in Indonesia, particularly following Supreme Court Decision Number 31 K/Sip/1969 expanding unlawful meanings beyond legislation violations to encompass actions contradicting propriety principles, morality norms, and others' subjective rights. This doctrine provides space for consumers pursuing compensation even when specific legislation has not yet detailed particular violation forms.

However, this research also confirms several obstacles exist in PMH implementation within e-commerce realms. Evidentiary difficulties, defendant party identification often unclear in electronic contracts, dispute resolution mechanism limitations, and low consumer legal awareness constitute factors inhibiting this doctrine's effectiveness. Comparisons with international practices, such as General Data Protection Regulation (GDPR) application in European Union, demonstrate that Indonesia still requires regulatory strengthening, particularly regarding personal data protection and electronic contracts. Consequently, it can be concluded that PMH constitutes applicable and effective legal instruments filling regulatory vacuums in Indonesian e-commerce consumer protection. For greater optimization, this doctrine's application requires support through specific regulatory strengthening, dispute resolution institution capacity enhancement, and consumer education toward greater rights awareness. Through these steps, consumer protection in digital eras hopefully proceeds more justly,

balancedly, and sustainably.

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