



Indonesian Muslim Feminists: Islamic Reasoning, Rumah Kitab And The Case Of Child Brides.

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Indonesian: not Arab!

Indonesia is a vast country with numerous languages, cultures and ethnicities. It should not surprise us that discussions about Islam reflect the complexity of the country. In spite of this diversity, authorities on Indonesian Islam agree that several distinctive features set it apart from Middle Eastern Islam. According to Azyumardi Azra, Indonesian Islam is firmly embedded in local cultures, and the state is democratically governed under the common ideological platform of the Pancasila model that in principle sanctions the full legal presence of Christian, Hindu, Buddhist, Confucian, and Bahai communities.¹ Furthermore, a distinctive feature is that for nearly half a century the majority of Indonesian Muslim leaders have allowed women to hold religious and secular leadership roles. This development is also discernible in various mainstream Muslim organizations of which Nahdlatul Ulama (NU) and Muhammadiyah are the largest, and “can be seen as a perfect representation of Islamic-based civil society.”²



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¹ Azyumardi Azra, “Distinguishing Indonesian Islam. Some lessons to learn.” In: Burhanudin, Jajat and Kees van Dijk (eds.) *Islam in Indonesia. Contrasting Images and Interpretations*. (Amsterdam: ICAS / Amsterdam University Press,

² *Ibid.* p. 71.

Simply put, the prevalent opinion is that Indonesian Islam is not Arab and never will be. Yet, when in 1998, the Suharto regime fell and the country's political system became more democratic, Islamic movements whose main goal was to align Indonesian Islam more closely with interpretations from Middle Eastern Arab countries started to influence the country's public life. The new-found democratic freedoms not only allowed for a pluralization of Islamic ideals, but also led to a fragmentation of religious authority. Communal boundaries were redrawn and relatively small numbers of extremist Muslim thinkers disproportionately influenced the creation of new laws and Islamic regulations. New political and religious actors emerged, all presenting new possibilities for what Hoesterey and Clark referred to as a glorious Islam "in the abstract."³ In this crowded landscape, women, their bodies, roles, and rights became the symbolic bearers of how the abstract should be translated into reality.⁴

This new religious reality begs the question as to how Muslim feminist activists belonging to the mainstream organizations of NU and Muhammadiyah negotiated some of the sweeping changes in religious attitudes. While feminism comes in many forms, in this context I refer to Muslim feminists; women and men for whom the key to women's liberation is found in re-interpreting the Qur'an and other Islamic sources (for example the Tradition or *Hadith*) from the perspective of gender equality. Their reference point is the belief that the sources for women's liberation are the Muslim holy texts, but that these have been misread and abused to subordinate women.⁵

In Indonesia, feminists, Muslim or not, fight several battles against multiple forms of injustice perpetrated against women. Among others, they address issues connected to domestic violence and other forms of violence against women such as human trafficking, women's reproductive rights (including FGM, Female Genital Mutilation)⁶, polygamy, unregistered or secret forms of marriage (*nikah siri*), child marriage (*pernikahan di bawah usia*, or *pernikahan dini*), and women's public and private leadership roles.⁷

³ Hoesterey, James & Marshall Clark, "Film *Islami*:" Gender, Piety and Pop Culture in Post-Authoritarian Indonesia." *Asian Studies Review*, 36/2012 (207-226), p. 223.

⁴ A.o. see: Brenner, Suzanne, "Private Moralities in the Public Sphere: Democratization, Islam, and Gender in Indonesia." *American Anthropologist* 13/3 (2011) 478-490, Nancy J. Smith-Hefner, "Javanese Women and the Veil in Post-Soeharto Indonesia," *The Journal of Asian Studies*. 66/2, 2007, 389-420.

⁵ Some of the foundational Qur'anic teachings these feminists refer to are: Justice for all and equality between men and women (Q. 33:35), Women and men were both created from the same spirit (*nafs*) (Q 4:1, 6:98, 7:189), Equality, especially concerning religious observance (Q. 33:35) and husband and wife as "each others garments" (Q. 2:187)

⁶ While the practice of FGM is decreasing in most countries in the Middle East, presented as an Islamic purity ritual, it is on the rise in Indonesia and has been backed by the State. In November 2010 the Indonesian Ministry of Health legitimized the practice of FGM and authorized medical professionals to perform it (regulation 1636). The issue even made it to the front-page of the New York Times of 2-5-2016, "Unicef Report Finds Female Genital Cutting to Be Common in Indonesia: <http://www.nytimes.com/2016/02/05/health/indonesia-female-genital-cutting-circumcision-unicef.html>.

⁷ I have written about some of the many issues Indonesian Muslim feminists address elsewhere. Among others, see: "Une nouvelle génération féministe au sein de l'islam traditionaliste : une exception indonésienne?" with

In this essay I focus on the strategies developed against the practice of underage or child marriage by the non-governmental organization Rumah Kitab (Rumah Kita Bersama). The rationale for this choice is that the practice of child or underage marriage touches on several of the main priorities of the Muslim feminist agenda as it includes the issues of secret marriage and polygamy. Furthermore, in Indonesia and many Muslim majority countries it is a brazen infraction of state marriage laws that impose a minimum age for women and men. Underage marriage is a form of violence against women, it threatens a girl's (reproductive) health, and is often performed in secret as by necessity it remains unregistered. In many instances the child bride enters a polygamous union.

According to the 2015 report by Coram International, 7.8% of Indonesian brides were 12-14 years old and 30.6% were 15-17 at the time of marriage (according to Indonesian law, the minimum age for girls is sixteen and for boys, nineteen).⁸ These numbers are higher than the numbers given by Unicef in 2014 that estimated 21% of Indonesian women between the age of 20-24 to be married before the age of eighteen of whom 3% were under the age of 15.⁹ The practice is mostly driven by socioeconomic factors such as poverty and local customs. For example some areas perform so-called "hanging" marriages (*kawin gantung*): a girl child is officially married but sexual relations are postponed until she has reached maturity. Child marriage is also supported by rigid gender norms that normalize male violence against women. Certain radical Muslim groups have promoted the practice as proof of Islamic correctness and a means to protect the bride's honor. Some groups even present the practice as "cool."

Rumah Kitab

Rumah Kitab, the acronym for Rumah Kita Bersama (our common home), operates within institutions connected to the Muslim organization of NU. In particular, its programs reach out to students studying in Qur'an schools (*pesantren*) connected to NU where the future leaders of Islam are being educated. Rumah Kitab was launched in

Andree Feillard, REMMM 128, (January 2011) 113-127, "Polygamy and Harmonious Families: Indonesian Debates on Gender and Marriage." In Susanne Schröter (ed.), *Women and Gender in Southeast Asia*. (Leiden: Brill, 2013), 55-71, "Translating Text to Context: Muslim Women Activists in Indonesia," in Masooda Bano and Hilary Kalmbach (eds), *Women, Leadership and Mosques: Changes in Contemporary Islamic Authority*. (Brill Publishers, 2011) 413-436, "Indonesian Women Activists: Spiritual Callings in Times of Change and Adversity," in: Zayn Kassam (ed.), *Muslim Women's Spirituality*, (Rowman & Littlefield, 2010), 245-262, Re-considering Authority: Indonesian Fiqh Texts about Women," in: R. Michael Feener and Mark Cammack, *Islamic Law in Modern Indonesia: Ideas and Institutions*. (Cambridge, MA: Harvard University Press, 2007) 27-43, Controlling the Body: Muslim Feminists Debating Women's Rights in Indonesia," *Religious Compass*, (Blackwell Publishers, November 2008) 1021-1043, and "Defining Evil to Strengthen Islam: Muhammadiyah Ideologies of Gender and Marriage," in: Nelly van Doorn-Harder & Lourens Minnema (eds.) *Coping with Evil in Religion and Culture: Case Studies*. (Amsterdam, & New York: Rodopi, 2007) 154-169.

⁸ PLAN international and Coram International, "Getting the Evidence: Asia Child Marriage Initiative Summary Report," p. 7. Accessed 2-8-2016 at <http://www.girlsnotbrides.org/reports-and-publications/getting-the-evidence-asia-child-marriage-initiative-summary-report/>

⁹ See the numbers on the site <http://www.girlsnotbrides.org/child-marriage/indonesia/>

2005 by Lies Marcoes-Natsir, a well-respected Muslim feminist. Its goal is to transform Indonesia's Muslim society by addressing the various paradigms, moral and ethical norms, values, and teachings that have shaped current ways of thinking within society.¹⁰ Since its inception, the Rumah Kitab researchers have taken on various questions such as why women join and support radical-minded Muslim groups, how to alleviate poverty among divorced women, Islam and birth control, and child marriage.¹¹ The research team has an average of eight members, women and men, who are all connected to the *pesantren*.

Students typically leave the *pesantren* after finishing the high school level and continue studying in one of Indonesia's State-sponsored Islamic universities. Upon graduation they become part of the vast network of teachers, local imams, judges in the religious courts, and civil servants working in institutions such as the governmental offices that regulate matters of personal status law such as marriage, divorce, child custody, and inheritance. Many alumni of these universities hold state-sponsored jobs that require them to regularly attend post-graduate courses. In order to better serve alumni attending these courses, especially those working at the grassroots level, a research team from the Shari'ah Department at the Islamic State University in Yogyakarta (UIN Sunan Kalijaga) investigated which issues were most debated at that level.

The researchers found that with regards to teachings concerning women, at grassroots levels across Java, radical-minded discourses inspired village imams to promote heavily the practices of polygamy, underage marriage, and secret marriage.¹² These findings were significant since in rural areas, the poor and the uneducated often take their clues from the local imams. Their advice provided the religious rationale for practices such as giving a young daughter in marriage for financial reasons and for bypassing official registration.

¹⁰ On the website, Rumah Kitab states as its mission <http://rumahkitab.com/en/>:

- To develop resource center in creating inquisitive minds about Indonesia's Islamic aspects as well as social changes for marginal society based on text studies from the Yellow Books (traditional Islamic books containing lessons from Arabic grammar to social and community knowledge), transformative researches, and their advocacy to decision makers.
- To develop community-based *pesantren* boarding schools as mean of learning and think tank of critical Islamic minds as agents of change.
- To perform regenerations of Islamic critical minds based on [the] repertory of classical intellection [heritage] or the Yellow Books.
- Organizing campaigns for public education and dissemination of Islamic thoughts that support the marginalized in society.
- To develop the organizational and institutional capacity of Rumah KitaB as a learning organization in managing knowledge and develop critical minds [that are] ready to face change.

¹¹ Lies Marcoes-Natsir & Lanny Octavia (eds.) *Kesaksian Para Pengabd. Kajian tentang Perempuan dan Fundamentalisme di Indonesia*. (Testimony of the servants. Research concerning women and fundamentalism in Indonesia) (Jakarta: Rumah Kitab, 2014), Mukti Ali, Roland Gunawan, Jamaluddin Mohammad and Ahmad Hilmi. *Aku, Kamu, End. Membaca ulang teks keagamaan kawin anak*. (I, You, End. Re-reading religious texts about child marriage.) (Jakarta: Rumah Kitab, 2015). For more titles see: <http://rumahkitab.com/project-list/works/>

¹² Maufur, Noorhaidi Hasan and Syaifuddin Zuhri. *Modul Pelatihan Fiqh dan HAM*. (Yogyakarta: LKiS, 2014).

The Marriage Act and the Compilation of Islamic Law

As the figures reported by Unicef and Coram show, underage marriage is a real problem in Indonesia. The topic exemplifies the multi-layered and complex reality that we call “Islam in Indonesia” as its practice interacts with the marriage law, Islamic interpretations, cultural practices, and contesting views on the role and rights of women.

On the State level, the issue of child marriage should be impossible due to stipulations in the Marriage Act that have provided legal guidance since its introduction in 1974. This law was the result of prolonged debates over the question whether or not there should be a single set of rules applicable to all Indonesians or if separate statutes should rule different ethnic and religious communities. The Act stipulated that the marital age for a girl was sixteen and for a boy nineteen. Disagreements, among others, concerned the degree to which Islamic injunctions should be applied and, for example, concerned the question of whether a man could marry more than one wife.

Family law is of the utmost importance to Muslims and the Qur’an addresses in detail legal injunctions concerning marriage, divorce, and inheritance. In 1991, the Indonesian government added a code to the Act that was meant to guide judges in taking their decisions. This Code, the Compilation of Islamic Law (*Kompilasi Hukum Islam*), was considered to be the product of a gradual Islamization process within the country and did not entirely forbid polygamy but stipulated various rules that made it difficult to take multiple wives. Among others, in order to be recognized by the state, a marriage has to be performed in the presence of an official marriage registrar and has to be registered.¹³ The problem with the Act and the Compilation is that they do not differentiate between religious validity and the state legality of marriage. As a result, from a religious point of view, a marriage is not deemed to be invalid if it is not officially registered.¹⁴ Thus, there are no sanctions for those who do not comply with the official state rules but follow the Islamic marriage rules instead. The requirements for a legal marriage according to Islam are that the bride is represented by her guardian (*wali*), that two witnesses are present, that there is a clear proposal and clear acceptance, and that a marriage gift (dowry) is given.

Muslim feminist scholar Euis Nurlaelawati explains that at the time the Marriage Act was drafted “on the one hand, the reformers reveled in the winds of reform and it was their intention to see marriages well managed. On the other hand, they lacked the bravery to deviate from and go beyond the shari’a line.”¹⁵ Analyzing the decisions of the religious courts concerning polygamy, Nurlaelawati concluded that this ambiguity and dualism

¹³Euis Nurlaelawati, “Managing familial issues. Unique features of legal reform in Indonesia.” In: Burhanudin, Jajat and Kees van Dijk (eds.) *Islam in Indonesia. Contrasting Images and Interpretations*. (Amsterdam: ICAS / Amsterdam University Press, 2013), p. 127.

¹⁴ Ibid. p. 128.

¹⁵ Ibid. p. 133.

continues to translate into misogynist decisions by the judges whose decisions nearly always favor the husband.

This ambiguity de facto allows Indonesian Muslims to ignore the Marriage Act. As such, Islamic procedures are appealing to many Indonesian Muslims because of their simplicity. They also find support among large parts of the population simply because they are considered to belong to core Islamic teachings.¹⁶ Men marrying a girl under sixteen can use these loopholes since the Islamic sources remain silent about a minimum age for marriage. As a result, conservative and radical-minded Muslims argue that the Marriage Act contradicts the Holy Sources. When a marriage has not been registered, it creates legal problems for children born from such a union. Furthermore, a divorce invariably will be out-of-court.¹⁷

Child Brides

According to the Tradition, the Prophet Muhammad married his favorite wife A'isyah when she was six or seven and the marriage was consummated when she was nine or ten. Based on this precedent, the Islamic Law has not stipulated a minimum age for girls to be married. Historically, child marriage was common around the world. In the West, the practice began to be questioned in the 20th century as our concepts of children and childhood changed and psychological and social research exposed how it harmed girls psychologically and physically. Nowadays, in most majority Muslim countries, the State has set a minimum age starting at fifteen years for girls. According to the Rumah Kitab team, to protect the girl child and the core meaning of marriage, Indonesian Muslims should follow the rules of the Marriage Act.¹⁸ Some Muslim scholars have argued that A'isyah's age given in the Tradition was wrong and that she was between 17 and 18 years-old when she married the Prophet. This argument is based on her sister's age at the time of the marriage.¹⁹

Feminist activists have argued that even the minimum age of sixteen is far too young for a girl to get married and in 2014 petitioned Indonesia's Constitutional Court to change the age to eighteen. This request was denied based on moral arguments, that "allowing girls to get married earlier can help prevent pre-marital sex and children born out of wedlock."²⁰ Furthermore, the Court argued that Islam only stipulated that a girl must have reached the age of puberty or sexual and social maturity, *aqil baligh*, and can

¹⁶ Mark E. Cammack, Helen Donovan, and Tim B. Heaton. "Islamic Divorce Law and Practice in Indonesia." In: Feener, R. M. and M. E. Cammack (eds.) *Islamic Law in Contemporary Indonesia. Ideas and Institutions*. (Cambridge, MA: Harvard University Press, 2007), p. 125.

¹⁷ Ibid. p. 124.

¹⁸ Mukti Ali e.a., *Aku, Kamu, End*, p. 25-28.

¹⁹ Maufur, e.a. *Modul Pelatihan Fiqh dan HAM*, p. 62, 63.

²⁰ Adelia Putri, "Indonesian court says no to raising minimum marrying age for girls." June 19, 2015.

<http://www.rappler.com/world/regions/asia-pacific/indonesia/96905-indonesian-court-rejects-judicial-review-marrying-age>

consent to the marriage. Thus, this decision aligns itself with traditional opinions and customs that are still widespread across the Archipelago and ties in with conservative and radical-minded Muslim discourses.

In order to change the mindset about this issue, in 2015, Rumah Kitab published the book *Aku, Kamu, End. Membaca ulang teks keagamaan kawin anak*; I, You, End. Re-reading religious texts about child marriage. The book is based on extensive research that, among others, includes the historical and religious context of the practice. When reading the Holy Texts, Rumah Kitab takes as a point of departure that interpretations should be placed within contemporary contexts and needs.²¹ This approach should also be followed when applying the rules on child marriage that are found in the Islamic Jurisprudence (*fiqh*).²² Finally the team emphasizes issues that are important to society as a whole such as a girl's schooling, health and psychological maturity.

The team's most important argument against the practice, however, relies on the Qur'anic teachings that speak about the fact that men and women were created from one soul and serve as each other's companion: Q. 7: 189: It is He who created you from one soul and created from it its mate that he might dwell in security with her. . ." and Qur'an 4:1: "O mankind, fear your Lord, who created you from one soul and created from it its mate and dispersed from both of them many men and women..." These verses underscore the fact that a marriage is a union between equals. With many child brides being much younger than the husband, one of the core teachings of the Qur'an that man and wife should be each other's equal, is being ignored.²³ Furthermore, research shows that when spouses are not compatible, this leads to high divorce rates, unstable families and an increase of mental problems.

Imitating Arab Voices

Before the fall of Suharto, child marriage was an accepted practice in certain districts, rural areas, and Muslim circles. So one of the questions the Rumah Kitab team asked was "After 1998, which voices were most influential within the crowded field of Islamic ideals and the competition for religious authority?" They found that the most influential texts in Indonesia that were widely available on the Internet, were written by two Yemeni scholars, Abu Ammar Ali al-Hudzaifi, and Arif Ibn Ahmad al-Shabri.²⁴

²¹ Also see Asma Barlas. "Believing Women" in Islam. *Unreading Patriarchal Interpretations of the Qur'an*. (Austin: University of Texas Press, 2002), 125-127.

²² Mukti Ali e.a., *Aku, Kamu, End*, p. 23.

²³ Mukti Ali e.a., *Aku, Kamu, End*, p. 28.

²⁴ Abu Ammar Ali al-Hudzaifi, *Al-zawaj al-Mubakkir fi Mizan al-Syari'ah* and Arif Ibn Ahmad al-Shabri, *Al-Zawaj al-Mubakkir bayna Hirasah al-Islam was Ta'amur al-Ittifaqiyyat al-Duwalliyah*. Mukti Ali e.a., *Aku, Kamu, End*, p. 82. The second book, published in Yemen, 2010 can be downloaded in Arabic from: <http://www.islamtoday.net/nawafeth/artshow-86-129656.htm> (*Perkawinan anak usia dini Antara proteksi Islam dan kospirasi consensus internasional*). *الزواج المبكر بين حراسة الإسلام وتأمير الاتفاقيات الدولية* (Sana Yemen: 2010).

The practice of child marriage is widespread in Yemen and has regularly caused international uproar; among others, in 2010 when a 13-year-old girl died of internal injuries after the wedding night.²⁵ Stressing that these scholars read the Holy Texts in a literal fashion, the Rumah Kitab team lists the various arguments the scholars present that are aimed at convincing Indonesians that the practice of child marriage is firmly situated within Islam., These scholars argue that forbidding the practice goes against the Islamic Law and is based on a Western conspiracy to lure Muslims into unlawful practices such as homosexual intercourse between unmarried boys, delaying marriage that leads to fornication, breast cancer, and multiple problems with pregnancy.²⁶

When all is said and done, the battle over child brides remains an issue of Islamic reasoning, of how the Holy Texts are being interpreted, and of what is acceptable to the average Muslim at a certain time and place. This observation was brought home in the case of a Muslim religious leader called Shaykh Puji who decided to challenge the issue of minimum age in public. In retrospect the case was a test balloon to see how the general Muslim population would react when confronted with the reality of a young girl's marrying a much older man. In August 2008, 43-year-old Shaykh Puji, a wealthy businessman and head of an Islamic boarding school contracted a secret (unregistered) marriage with Lutfiana Ulfa, 11 years and 10 months old. The girl had just begun studies at a local junior high school, but had dropped out to take up her wifely duties at home.²⁷

Lutfiana came from a poor household and her parents were delighted with the offer in light of the groom's prosperity. However, when it turned out that it was not clear if Lutfiana had agreed to the marriage, but might have been pushed into it by her parents after winning a "wedding contest" organized by the Shyakh, children's rights activists started to ask if this was a matter of Islamic piety or plain old pedophilia. When the Shaykh announced in public that in his desire to follow the model of the Prophet Muhammad he was planning to marry a 9-year-old and a 7-year-old, the Indonesian Child Protection Commission (*Komisi Perlindungan Anak Indonesia / KPAI*) took him to court.²⁸ In 2010, based on the Child Protection Act, Shyakh Puji was sentenced to 4 years in jail for marrying an underage girl.²⁹ So in the end, the verdict was that he was a

²⁵ Daily Mail.com, April 9, 2010: <http://www.dailymail.co.uk/news/article-1264729/Child-bride-13-dies-internal-injuries-days-arranged-marriage-Yemen.html>.

²⁶ For the entire list of arguments see: Mukti Ali e.a., *Aku, Kamu, End*, p. 82-94.

²⁷ Puji whose full name is Pujiono Cahyo Widayanto/Widianto, is the head of an Islamic boarding school (Ponpes Miftahul Jannah) in Bedono, Jambu, Semarang, Central Java.

<http://therabexperience.blogspot.com/2008/10/syekh-puji-indonesian-law-pedophilia.html> and

<http://www.indonesiamatters.com/2768/pujiono-cahyo/>

²⁸ Patung, "Syekh Puji, Pujiono Cahyo & Underage Lust." *Indonesia Matters*, October 2008.

<http://www.indonesiamatters.com/2768/pujiono-cahyo/>

²⁹ Pasal 81 UU No 23 Tahun 2002 tentang Perlindungan Anak.

pedophile. Both his wives, Lutviana Ulfa and his 26-year-old first wife Ummi Hani, wept at the news.³⁰ Nobody explained if they were tears of joy or grief.

Indonesian Islam

The fact that five years later Rumah Kitab still lists child marriage as one of its main priorities shows that the battle is far from over. A digital campaign, workshops, numerous talks and the book mentioned in this essay are all meant to address the issue. The main audience are the students and teachers at the *pesantren*. To help them study and understand all the subtleties of the topic, the book offers a wide array of detailed information, including alternative forms of religious reasoning for future use when these young scholars teach and guide the Muslim believers.

In the end the goal is to find a middle way between following the Holy Scriptures, the wellbeing of the girl child, Indonesian culture, and the needs of the country. In this context, the opinion of a venerable Indonesian leader of Islam, K.H. Muhammad Ali Yafie matters. Born in 1926, he saw education for men and women as the main secret to his country's vibrant economic, political and religious life. His advice was that: "young people should be encouraged to study longer so that they achieve better employment and the quality of human resources in Indonesia will increase." Consequently, in his views, "the tradition of marrying young belongs to a certain period of time and can no longer be seen as the general marriage pattern."³¹

This comment was published during the early 1990s at a time when women's emancipation seemed a given once structural problems such as poverty and the lack of education had been remedied. However, few could fathom the influence of the radical voices that started to resound during the early 2000s. A decade later, many of the groups that tried to apply a radical interpretation of Islam have toned down and the majority of Indonesian Muslims prefer to follow moderate expressions of Islam.³² In spite of these developments, efficient media campaigns allow for radical voices, together with Islamist fatwas and writings of Yemeni, Saudi Arabian, and other Middle Eastern Muslim leaders, to spread and settle in remote corners of the Archipelago. So the battle to save girls from harmful marriages continues-- with Muslim feminists at the forefront.

³⁰ "Syekh Puji Divonis 4 Tahun Penjara. Langsung Banding," March 8, 2011, Detik News, <http://news.detik.com/berita/1501542/syekh-puji-divonis-4-tahun-penjara-langsung-banding>

³¹ Mukti Ali e.a., *Aku, Kamu, End*, p. 110.

³² Noorhaidi Hasan, *Laskar Jihad. Islam, Militancy, and the Quest for Identity in Post-New Order Indonesia*. (Ithaca, NY: Cornell Southeast Asia Program, 2006) p. 221.