

SOCIAL CONSTRUCTION OF RESPONSIBILITY ON *SIRI* POLYGAMY IN MADURA

Adiyono¹, Rudi Hermawan², Agustina Kumala Dewi Sholihah³, Hawa Gazani⁴,

Ach. Mus'if⁴

^{1,2,3,4,5} Trunodjoyo Madura University, Indonesia

Email: adiyono@trunojoyo.ac.id

Abstract

This study examined siri polygamy (unregistered polygamy) in Madurese society, focusing on second and third wives and community leaders. It investigated the husband's "seriousness" as justification and assesses rights protection for women and children in these unregistered marriage. The analysis revealed tensions between tradition and state law, offering insights into contemporary Indonesian polygamous families. This study used qualitative study by applied a sociological approach, employing a case study method with in-depth interviews of six women in polygamous relationships in Madura. Conclusions: First, the husband's motive of "seriousness" in practicing siri polygamy was locally interpreted as a sign of commitment through the husband's provision to his secret wife of a permanent residence, regular financial support, and assurance of a secure future for her and their children, whereas temporary housing tends to raise suspicions about the husband's long-term commitment. Second, the Madurese community views the intention behind serious "e kabenthal patheh" siri polygamy a sincere intention for religious devotion and a desire to live together as being demonstrated by those who provide permanent housing and regular monthly financial support. Third, most women agree to siri polygamy because their husbands give them high hopes of living together permanently, though these hopes sometimes fall short of their expectations.

Keywords: Unregistered Polygamy, Social Construction

Abstrak

Penelitian ini mengkaji praktik poligami siri di masyarakat Madura, khususnya yang melibatkan istri kedua dan ketiga, termasuk tokoh masyarakat. Fokus penelitian adalah menggali motif 'keseriusan' suami sebagai justifikasi, sekaligus menilai perlindungan hak-hak perempuan dan anak dalam pernikahan tidak tercatat tersebut. Hasil analisis mengungkapkan adanya ketegangan antara norma tradisi dan hukum formal, serta memberikan pemahaman mendalam mengenai realitas keluarga poligami di Indonesia masa kini. Penelitian ini kualitatif, pendekatan sosiologi-hukum, dengan metode studi kasus dengan wawancara mendalam pada enam perempuan yang dipoligami di Madura. Kesimpulannya Pertama, Motif keseriusan suami melakukan poligami siri ditafsirkan secara lokal sebagai tanda keseriusan dengan pemenuhan suami kepada istri siri terhadap hadiah rumah tinggal permanen, pemenuhan nafkah rutin dan menjamin hidup masa depan dan anaknya, sedangkan tempat tinggal sementara cenderung menimbulkan kecurigaan tentang komitmen jangka panjang suami. Kedua, Pandangan masyarakat Madura niatan poligami siri serius "e kabenthal patheh" niatan tulus ibadah dan mempunyai niatan hidup bersama adalah mereka yang memberikan tempat tinggal permanen dan adanya nafkah

rutin bulanan. Ketiga, Sebagian besar perempuan mau dipoligami siri karena mereka diberikan harapan besar oleh suaminya akan hidup bersama seterusnya, namun kadang harapan itu di luar ekspektasinya.

Kata Kunci: Poligami siri, Konstruksi Sosial

A. INTRODUCTION

From a normative legal perspective, polygamy in Indonesia is not categorically prohibited but is conditionally permitted under Article 3(2) of Law Number 1 of 1974 on Marriage. This provision authorizes the court to grant approval for a husband to practice polygamy, subject to the fulfillment of substantive and procedural requirements prescribed by the Indonesian legal system.¹ According to data from the Supreme Court in 2022, there were 501 applications for permission to marry in a polygamous marriage. Specifically, in the jurisdiction of religious court in Surabaya, there are 131 people applying for authorization of polygamous marriage.² By contrast a legally registered polygamy, in contrast, occupies a more balanced position across philosophical, juridical, and social dimensions. Its adherence to state law demonstrates a legal framework committed to gender equality and women's empowerment.³

In reality, Indonesian society including a community in Madura Island, this proves that some spouses practice unregistered polygamy (*poligami siri*). In practice, however, women in such marriages tend to be in a disadvantaged position, because they have to be economically compelled and because they want to be in a marriage.⁴ Polygamy is still practiced and in some traditional Muslim communities, unregistered marriage is equated with non-compliance with the state regulations to this day. This phenomenon is influenced by the authority of

¹ Pemerintah Indonesia, "Undang-Undang No 1 Tahun 1974 Tentang Perkawinan" (1974).

² Mahkamah Agung RI, "Permohonan Izin Poligami," n.d., https://pusatdata.badilag.net/perkara/Pencarian_smart/direktoriDataset_jenis/341.

³ Ermagusti, Erwin, and Rido Putra, "Hadji Agus Salim 's Islamic Feminism Thoughts and Its Contribution to Contemporary Islamic Studies," *Jurnal AFKARUNA* 20, no. 2 (2024): 225–39.

⁴ RT Husain, AH Wahid, M Ghozali, ZS Ibrahim, M Asaad, "Happiness Permissibility: Negotiating Hadith on Polygamy as Perfection of Worship in Wahdah Islamiyah Muslim Women," *Al-Ihkam: Jurnal Hukum & Pranata Sosial* 19, no. 2 (2024).

Kyai . (Islamic religious leaders) some of whom allow such practices.⁵

The lack of clear regulation in KHI Article 14 creates legal uncertainty, often pushing widows (*nikah-siri*), thereby jeopardizing their legal protection and rights.⁶ Secret marriages, which blend elements of customary law and Islamic law, proceed in tandem without neglecting religious considerations, ensuring harmony and mutual complementarity.⁷ In fact, marriage is an act of worship; it is also a commandment and a tradition established by the Prophet Muhammad for himself and for his followers.⁸ The essence of *mithaqan ghalidan* marriage is a physical and spiritual bond between husband and wife, aimed at building a happy, enduring family grounded in belief in One God.⁹ According to the Compilation of Islamic Law, marriage is intended to realize a family life characterized by *sakinah*, *mawaddah*, and *rahmah*.¹⁰ Marriage is so sacred that Allah mentions it in the Qur'an as a very strong bond a physical and spiritual bond between a man and a woman as husband and wife. Allah created the wife as a source of tranquility in family.¹¹

Regarding the obligation of financial support, husband must provides a portion of his wealth to his wife as maintenance, which she then uses for household needs.¹² The husband's obligation to provide for his wife's physical

⁵ Baihaqi, Titik TriwulanTutik Ahmad Musadad, A.MuftiKhazin, Mahtum Ridho Ghuftron, "Legal Non-Compliance and Kiai Hegemony : The Practice of Unregistered Marriages among the Madurese Muslim Community of Kubu Raya," *Journal of Islamic Law* 5, no. 2 (2024): 242–68, <https://doi.org/Doi.org/10.24260/jil.v5i2.2819>.

⁶ Ahmad Suryana et al., "Rethinking Marriage Guardians for Widows in Indonesia : Perspective of Legal Certainty and Maslahat Theory," *Justicia Islamica: Jurnal Kajian Hukum Dan Sosial* 22, no. 1 (2025): 71–92, <https://doi.org/10.21154/justicia.v22i1.9990>.

⁷ Madina Dinda Difia, Zezen Zainul Ali, and Mega Puspita, "Aligning Islamic Law And Customary Law: Legal Dialectics In The Tradition Of Forced Marriage In Jambi," *Justicia Islamica: Jurnal Kajian Hukum Dan Sosial* 20, no. 1 (2023): 1–16, <https://doi.org/10.21154/justicia.v20i1.4720>.

⁸ Amir Syarifuddin, *Hukum Perkawinan Islam Di Indonesia; Antara Munakahat Dan Undang-Undang Perkawinan* (Jakarta: Kencana, 2011).

⁹ Indonesia, Undang-undang No 1 tahun 1974 Tentang Perkawinan.

¹⁰ Republik Indonesia, "Instruksi Presiden Nomor 1 Tahun 1991 Tentang Kompilasi Hukum Islam" (1991).

¹¹ Departemen Agama RI, *Al-Qur'an Dan Terjemahannya City: Bandung* (Bandung: Syaamil Al-Qur'an, 2019).

¹² Syarifuddin, *Hukum Perkawinan Islam Di Indonesia; Antara Munakahat Dan Undang-Undang Perkawinan*.

and emotional needs applies not only to his first wife but also to his second wife and any subsequent wives. The husband must provide for his children's physical needs and well-being. In Islamic law, this obligation rests on him both materially and emotionally as stated in the Quran, Surah Al-Baqarah, verse 233, which reads: "*And the father's duty is to provide food and clothing to the mothers in a manner that is appropriate.*" "*No soul is burdened beyond its capacity,*" and in the Quran, Surah Al-Talaq, verse 7, which reads: "*Let those who are able provide for their families according to their means. And those whose means are restricted should provide from what Allah has given them. Allah does not burden a person beyond what He has given him.*"¹³ Both of these verses command a husband to fulfill his obligation to provide for his family. However, regarding the exact amount of support a husband must provide to his wife, no specific upper or lower limit has been established. Al-Qurtubi, in his commentary on Surah At-Talaq, verse 7, explains that the phrase "*liyunfiq*" means that a husband should provide for his wife or his young children according to his means.¹⁴ A legal provision states that if a wife supports her family, it is considered sadaqah.¹⁵

To strengthen this study, the researcher reviewed previous studies on siri polygamy, including Umi Suprapti Ningsih's study. This study found that secret marriages in Proppo, Pamekasan, offer no legal protection for wives and children administratively, civilly, or criminally. Rights and long-term futures are neglected, with families focusing only on short-term needs.¹⁶

Research conducted by Nurulbahiah Awang on "The Concept and Proper Application of Polygamy in Malaysia: An Analysis of the Role of the Courts Based on the Provisions of the Islamic Family Law (Federal Territory) Act 1984" concluded that polygamous marriages in Malaysia are permitted, provided they

¹³ RI, *Al-Qur'an Dan Terjemahannya City: Bandung*.

¹⁴ Muhammad ibn Ahmad Al-Qurtubi, *Al-Jami' Li Ahkam Al-Qur'an* (Beirut: Dar Ihya' al-Turats al-'Arabi, 1985).

¹⁵ Hairul Hudaya, "Hak Nafkah Istri (Perspektif Hadis Dan Kompilasi Hukum Islam)," *Muadalah* 1, no. 1 (2013): 11, <https://doi.org/https://doi.org/10.18592/jsga.v1i1.664>.

¹⁶ Umi Supraptiningsih, "Perlindungan Hukum Anak Dan Istri Dalam Perkawinan Siri Di Kecamatan Proppo Kabupaten Pamekasan," *Al-Ihkam* Vol. 12 No (n.d.), <https://doi.org/10.19105/al-ihkam.v12i2.1479>.

obtain permission from the Sharia Court in the public interest. Polygamy without permission from the Sharia Court constitutes a violation of the law and can affect life after marriage. The Sharia Court is obligated to rule on applications for polygamous marriages based on the public interest, not individual interests, to ensure the well-being of all parties involved.¹⁷

Denna Ritonga's research on "Polygamy: A Threat or an Opportunity for Muslim Families? (A Sociological and Family Law Perspective)" reveals differing public views on polygamy. Factors such as educational level, religious understanding, and personal experience influence acceptance of this practice. In general, wives reject polygamy because they feel they are victims of injustice, with cases of child neglect among victims of polygamy becoming increasingly alarming. The practice of polygamy often causes harm, particularly to wives and children. This study compares normative ideals with practices via legal, social, and psychological perspectives and stresses the need for effective policy responses.¹⁸

The three studies revealed a sociology of law gap regarding motives, social construction, responsibility and seriousness in *siri* polygamy, how to explore power relations in Madurese culture from the perspective of religious and community leaders; this research can provide important information to women so they can be more cautious when entering into *siri* polygamous marriages to protect and ensure women's rights and the rights of children born as a result of *siri polygamy* in the future including both civil rights and the right to be treated equitably by men and the local community.

Based on the above background, the author considered it is important to be investigated entitled "Social Construction and Responsibilities in Siri

¹⁷ Nurulbahiah Awang, "The Right Concept and Application of Polygamous Marriage in Malaysia : An Analysis to the Role of Court under the Provision of Islamic Family Law (Federal Territories) Act 1984," *Al-Aḥwāl: Jurnal Hukum Keluarga Islam* 17, no. 1 (2024): 58–70, <https://doi.org/10.14421/ahwal.2024.17104>.

¹⁸ Denna Ritonga, "Polygamy: A Threat or Opportunity to The Islamic Family? (Sociology and Family Law Perspectives)," *Nurani: Jurnal Kajian Syari'ah Dan Masyarakat* 25, no. <https://doi.org/10.19109/nurani.v25i1.27389> (2025), <https://jurnal.radenfatah.ac.id/index.php/Nurani/article/view/27389>.

Polygamous Marriages in Madura". Research Questions can be formulated as: First, how is the practice of *siri* polygamous marriage carried out in Madura? Second, how can one determine the seriousness of the motives behind *siri* polygamous marriages in terms of protecting the rights of women and children in such arrangements?

This study employed a qualitative method with a sociological-legal approach. As a qualitative study, it gathers data in the form of oral information from informants. The collected data is then analyzed using the theory of the social construction of reality.¹⁹ This study obtained information on legal social behavior, which serves as the object of observation.²⁰ The sociological approach to *siri* polygamy is combined with legal norms and community practices: if legal norms are not enforced specifically by failing to register polygamous marriages will legal protection for women and children be achieved? The method used to study social change to discuss studies social change and its factors by analyzing human behavior and interactions..²¹ Primary data was collected through interviews with practitioners of *siri* polygamy, traditional leaders, religious leaders and members of the Madurese community. The data analyzed qualitatively to conclude legal and social norms related to *siri* polygamous marriages in the context of protecting women and children. This highlights the impact of social issues on legal regulations.²² The study demonstrated that the "seriousness" of *siri* polygamy, as defined by social construction, is based on responsibilities established through indicators of economic sufficiency, legitimate residence and community acceptance. Whereas this social construction may provide a sense of social security for women, It may still fail to guarantee formal legal protection for wives

¹⁹ Peter L. Berger and Thomas Luckmann, "The Social Construction of Reality: A Treatise in the Sociology of Knowledge, Repr. in Penguin Books, Penguin Social Sciences" (London: Penguin Books, 1991).

²⁰ Anselm Strauss and Juliet Corbin., *Dasar-Dasar Penelitian Kualitatif Tatalangkah Dan Teknik-Teknik Teoritisasi Data*, Terj. Muhammad Sodik Dan Imam (Yogyakarta: Pustaka Pelajar, 2023).

²¹ Gusti Ketut Ariawan, "Metode Penelitian Hukum Normatif," *Jurnal Fakultas Hukum UNIPAS* 1 No. 1, no. 1 (2022): 2–3.

²² Emmi Rahmiwita Nasution, *Mendesain Penulisan Ilmiah Dalam Penelitian Hukum* (Purbalingga: Eureka Media Aksara, 2024).

and children.

B. FINDING AND DISCUSSION

Related to the essential of Islamic teaching, Allah SWT created living beings in pairs, including men and women for relationships. A marital bond is forbidden unless a valid marriage unites them. In modern law, marriage is not just a personal agreement but a complex legal and civil event.²³

The term "polygamy" originates from Greek and consists of two root words: "*polu*" and "*gamein*." "*Polu*" means "many," and "*gamein*" means "to marry,"²⁴ and in the Indonesian context, it is written as "polygamy." In Indonesian tradition, polygamy refers to a marriage in which a man is married to more than one woman.

1. Polygamy in Marriage Law

Under the Marriage Law No. 1 of 1974, as amended by Law No. 16 of 2019, Articles 3 through 5 stipulate that Article 3, paragraph 1 states: "In principle, a man may have only one wife." A woman may only have one husband. Paragraph 2 stated that the Court may grant permission to a husband to have more than one wife if so desired by the parties concerned.

Article 4 paragraph 1, stated that if a husband intends to have more than one wife, as referred to in Article 3, paragraph 2, of this Law, he must file a petition with the Court in the district where he resides. Furthermore, in paragraph 2, the Court referred to in paragraph (1) This article permits a husband to marry more than one wife only if: a. the wife fails to fulfill her obligations; b. the wife has a physical disability or incurable illness; or c. the wife is unable to bear children.

Article 5 requires the following for a court petition under Article 4(1): a. consent from the wives; b. assurance that the husband can support his wives and children; c. guarantee that the husband will treat them fairly. Article 5, paragraph 2, states that the consent referred to in paragraph (1)(a) of this article is not

²³ Elizabeth S. Scott and Robert E. Scott, "Marriage as Relational Contract," *Va.L.Rev.* 84, 1998, 1225.

²⁴ Bibit Suprpto, *Liku-Liku Poligami* (Yogyakarta: Al Kautsar, 1990).

required of a husband if it is impossible to obtain the consent of his wives. They cannot be parties to the agreement, or if there has been no news from his wife for at least 2 (two) years, or for that reason require assessment by a court judge.

In the Compilation of Islamic Law (KHI), Chapter IX addresses the issue of having more than one wife. Article 55, paragraph (1), states: "A man may have more than one wife at the same time, but the number is limited to a maximum of four." Paragraph (2) states: "The primary condition for having more than one wife is that the husband must be able to treat his wives and children fairly." Paragraph (3) If the primary condition mentioned in paragraph (2) cannot be met, the husband is prohibited from having more than one wife.

Article 56, paragraph (1): A husband who wishes to have more than one wife must obtain permission from the Religious Court. Paragraph (2): The submission of the application for permission referred to in paragraph (1) must be carried out in accordance with the procedures outlined in Chapter VIII of Government Regulation No. 9 of 1975. Paragraph (3): A marriage to a second, third, or fourth wife without permission from the Religious Court has no legal force.

Article 57 states that the Religious Court shall only grant permission to a husband who intends to marry more than one wife if: a. the wife is unable to fulfill her obligations as a wife; b. the wife has a physical disability or an incurable illness; c. the wife is unable to bear children.

Article 58, paragraph (1): In addition to the main requirements mentioned in Article 55, paragraph (2), to obtain permission from the Religious Court, the requirements specified in Article 5 of Law No. 1 of 1974 must also be met, namely:

- a. the wife's consent;
- b. certainty that the husband is capable of providing for the living needs of his wife(s) and their children.

In paragraph (2), without prejudice to the provisions of Article 41(b) of Government Regulation No. 9 of 1975, the consent of the wife or wives may be given in writing or orally; however, even if written consent has been given, this

consent must be reaffirmed by the wife's oral consent during the Religious Court hearing. In paragraph (3), the consent referred to in paragraph (1)(a) is not required of a husband if it is impossible to obtain the consent of his wife or wives. They cannot be parties to the agreement, or if there has been no news from his wife or wives for at least 2 (two) years, or for other reasons that require the judge's assessment.

Under Article 59, if the wife refuses to give her consent, and the application for permission to have more than one wife is based on one of the grounds outlined in Article 55, paragraph (2), and Article 57, the Religious Court may grant permission after examining and hearing the wife(s) concerned during a hearing at the Religious Court; the wife or husband may file an appeal or a cassation appeal against this decision. Procedures for Polygamy Permits in Religious Courts

The technical implementation of polygamy permits in court follows the provisions as follows:

Law No. 1/1974 upholds monogamy, except where religious law permits polygamy. Muslim husbands must file a polygamy permit application with the Religious/Sharia Court, subject to the conditions outlined in Articles 4 and 5 of Law No. 1 of 1974. To ensure that the granting of a polygamy permit by the Religious Court/Sharia Court does not conflict with the principle of monogamy enshrined in Law No. 1 of 1974, the Religious Court/Sharia Court, in examining and deciding cases regarding applications for polygamy permits, must be guided by the following: (1) An application for permission to practice polygamy must be a contentious proceeding, with the wife named as the Respondent. (2) The grounds for granting permission for polygamy as stipulated in Article 4, paragraph (2) of Law No. 1 of 1974 are discretionary; that is, if any one of these requirements can be proven, the Religious Court/Sharia Court may grant permission for polygamy. (3) Polygamy permit requirements under Article 5(1) of Law No. 1/1974 are cumulative. Article 94 of the KHI governs joint property in polygamous marriages but may unjustly disadvantage the first wife; thus, it must

be understood as clarified in paragraph (5).

Property acquired by the husband during his marriage to his first wife constitutes joint property belonging to the husband and the first wife. Meanwhile, property acquired by the husband during his marriage to his second wife and while he remains married to his first wife constitutes joint property belonging to the husband, the first wife, and the second wife. The same applies to the second marriage if the husband marries a third or fourth wife. (6) The provision regarding joint property in paragraph (5) does not apply to property designated for the second, third, and fourth wives (such as a house, household furnishings, and clothing), provided that the property designated for the second, third, and fourth wives does not exceed $\frac{1}{3}$ (one-third) of the joint property acquired with the second, third, and fourth wives. (7) In the event of the division of joint property for a husband with more than one wife due to death or divorce, the calculation shall be as follows: For the first wife, $\frac{1}{2}$ of the joint property acquired with the husband during the marriage, plus $\frac{1}{3}$ of the joint property acquired by the husband together with the first and second wives, plus $\frac{1}{4}$ of the joint property acquired by the husband together with his third, second, and first wives, plus $\frac{1}{5}$ of the joint property acquired by the husband together with his fourth, third, second, and first wives. (8) Property acquired by the first, second, third, and fourth wives constitutes joint property with their husband, except for property acquired by the husband or wife through a gift or inheritance. (9) When applying for a polygamy permit, the husband must also file a petition for the determination of joint property with his previous wife or with his previous wives. If the husband does not file a petition for the determination of joint property in conjunction with his application for a polygamy permit, his wife or wives may file a counterclaim for the determination of joint property. (10) If the husband does not file a petition for the determination of joint property, that is combined with the petition for permission to practice polygamy. In contrast, the former wife does not file a counterclaim for the determination of joint property in the case regarding the petition for permission to practice polygamy, as referred to in

paragraph (9) above; the petition for a polygamy permit must be declared inadmissible.

Al-Maraghitt presented his thesis on the legitimacy of polygamous marriage:²⁵

- 1) Polygamous marriage due to the absence of offspring.
- 2) The wife has entered menopause.
- 3) A person with heightened sexual issues, unresolved by the first wife's extended cycle. Without polygamy, adultery could damage the family's religious and financial stability.
- 4) A higher female to male population ratio.
- 5) The opinions of Islamic scholars regarding polygamy, based on the arguments they present, can be categorized within the field of sociological legal studies.²⁶

2. The Social Construction of *Siri* polygamy in Madurese Society

Generally, *siri* polygamy in Madurese society resembles its practice elsewhere conducted discreetly and without official state registration. The term "*siri*" comes from Arabic and means "secret" or "hidden." In the context of polygamy, it refers to a marriage in which a man is married to more than one woman. Still, the marriage is not registered with the relevant authorities such as the religious affairs office or the civil registry and is unknown to the general public, including the first wife or other relevant parties.

In marriage, husbands and wives are expected to respect and remain faithful to one another until the end of their lives. Engaging in polygamy means that a man is violating the concept of fidelity in marriage. ²⁷ A study states that polygamy is a solution to the rampant infidelity caused by the strong dominance of economic factors in family life, the harsh influence of the environment,

²⁵ Ahmad Mustafa Al-Maraghi, *Tafsir Al-Maraghi*, Vol. 5, (Beirut: Dar al-Fik, tt.).183.

²⁶ Agus Purnomo, "Membincang Kembali Praktik Poligami Di Indonesia: Telaah Sosiologi Hukum," *Justicia Islamica* 5 (2025).

²⁷ Zakki Adhiyati; Achmad, "Melacak Keadilan Dalam Regulasi Poligami: Kajian Filsafat Keadilan Aristoteles, Thomas Aquinas, Dan John Rawls," *Undang: Jurnal Hukum* 2, no. 2 (2019): 409–31, <https://doi.org/10.22437/ujh.2.2.409-431>.

emotional closeness, and the prevalence of erotic and sexual influences in both the media and real life. Thus, polygamy offers a solution to protect believers from adultery and extramarital affairs.²⁸ If all the requirements for polygamy are met, it is permissible; however, if not, it creates new problems within the marriage and constitutes a legal violation.

According to Indonesian law, siri polygamous marriages are illegal or invalid because they do not meet the legal requirements for a valid marriage under applicable law. However, in classical fiqh, a siri polygamous marriage that fulfills the requirements and pillars of marriage is considered valid under the law.

The Indonesian Ulama Council (MUI) seems to wield considerable influence over interfaith marriage laws through its fatwas..²⁹ Most recently, the MUI filed a civil lawsuit in response to a ruling by the Surabaya District Court that permitted interfaith marriages. In the context of siri polygamous marriages, the MUI, The MUI's opinion notes that the new Criminal Code penalizes siri polygamy but does not forbid it under religious law. Nevertheless, the MUI rejects this criminalization. The MUI encourages the registration of marriages for the greater good rather than punishing those who enter into them.³⁰

A "siri" marriage is synonymous with a secret marriage; it is valid under Islamic law because its requirements and essential elements have been fulfilled.³¹ A "siri" is a marriage contract that deal requirements and essential elements of a legal marriage under Islamic law, but is not registered as required by Indonesia's Marriage Law. Some scholars thought hold that secret marriages are

²⁸ M. Samson Fajar, "Poligami Solusi Islam Mencegah Perselingkuhan Di Era Modern(Studi Hikmah Tasyri'iyah Di Syari'atkanya Poligami Dalam Islam)," *CENDEKIA :Jurnal Penelitian Dan Pengkajian Ilmiah* 1, no. 4 (2024): 132–46, <https://doi.org/10.62335>.

²⁹ Kholifatun Nur Mustofa et al., "Religious Authority and Family Law Reform in Indonesia: The Response and Influence of the Indonesian Ulema Council on Interfaith Marriage," *Juris : Jurnal Ilmiah Syariah* 23, no. 2 (2024): 383–93, <https://doi.org/10.31958/juris.v23i2.11849>.

³⁰ ed: Nashih : MUI Digital Sadam, "Apresiasi KUHP Baru, Kiai Ni'am Beri Catatan Kritis Soal Pelaku Nikah Siri Dan Poligami Yang Disebut Bisa Dipidana," n.d., <https://mui.or.id/baca/berita/apresiasi-kuhp-baru-mui-beri-catatan-kritis-soal-pelaku-nikah-siri-dan-poligami-yang-disebut-bisa-dipidana?page=4>.

³¹ Wannibaq Hasbul, *Perkawinan "Terselubung" Di Antara Berbagai Pandangan* (Jakarta: Golden Terayon Press, 1994).

valid, while others do not.³² The Maliki deems secret marriage invalid (*batal*), as it is classified as adultery (*min aushafiz zina*). The Shafi'i and Hanafi scholar however, regard secret marriages as valid, since keeping the marriage confidential does not affect its validity and the public announcement of a marriage is merely a recommended practice (*sunnah*). The Hanbali school deems this type of marriage *makruh* for both the bride and groom, as well as their guardians and witnesses.

Siri polygamy is problematic due to its legal invalidity and unregistered status, which denies state recognition and can lead to legal complications over inheritance, children's rights and family status.

It leads to injustice, especially for the first wife, who may be unaware of her husband's remarriage, and for children who may be denied their rights. Social and psychological impacts: *Siri* polygamy can also affect social and emotional relationships within the family, leading to feelings of distrust, disappointment, and conflict among family members. Furthermore, it adds to the psychological burden on women, especially since social media has become a powerful ideological tool to maintain the status quo of gender inequality and demean the status of women involved in *siri* polygamy.³³

The status of children born from a secret marriage, as per Constitutional Court Decision No. 46/PUU-VIII/2010, has implications for the children's status and civil rights. A child's status regarding civil rights is as follows: if the child is recognized as legitimate, they are entitled to full civil rights from both their legitimate father and mother; however, if the child is declared to have been born out of a legitimate marriage, they are entitled to civil rights only from their mother and her family. Nevertheless, if a petition for the child's status is filed in Court, the child may be granted civil rights from their biological father, provided that scientific evidence proves the child's biological relationship with the father;

³² M. Anshary, *Hukum Perkawinan Indonesia (Masalah-Masalah Krusial)* (Yogyakarta: Pustaka Belajar, 2010).

³³ Muhammad Zain, "From Scholarly Exegesis to Instagram's Spotlight: The Discursive Representation of Women's Subordination in Hadith," *Qudus International Journal of Islamic Studies (QIJIS)* 12, no. 2 (2024): 371–420.

but custody rights cannot be granted.³⁴

3. Socio-Legal Analysis and Legal Awareness of *Siri* Polygamy Practice.

Madura society highly values family honor, religiosity, and obedience to religious leaders.³⁵ The practice of "*siri*" marriages in Madura has been influenced by Islamic values: a marriage is valid if it fulfils the requirements and pillars of marriage, while its registration is more of an administrative formality rather than a requirement for its validity. As long as the marriage contract is conducted in accordance with Islamic religious provisions, some members of the community consider it valid, even if it is not officially registered with the state.³⁶ This perspective highlights a conflict between religious authority and state legality in marriage practices within Madurese society.

The practice of *siri* polygamy still exists in Madura, especially in Bangkalan and Pamekasan. In the community's view, such a marriage can be considered valid if conducted in accordance with classical Islamic law, which requires a valid marriage without the first wife's consent. Meanwhile, the Compilation of Islamic Law and the Marriage Law stipulate an absolute requirement that polygamous marriage necessitates the consent of the first wife and must be authorized by a ruling from the Religious Court.

Polygamy is easily found in urban communities, particularly among migrants who prioritize privacy and tolerance. Rural residents with wealth, leadership, or prestige may also practice it. Meanwhile, in rural areas, the practice of *siri* polygamy is rarely found; if it does occur, the perpetrators are typically migrants. The state has regulated the practice of polygamy to provide legal protection for citizens, particularly for women and children. These provisions are outlined in greater detail in several laws and regulations, such as the Compilation

³⁴ Atang Abd Hakim Halmi Abdul Halim, Oyo Sunaryo Mukhlas, "Pemikiran Hukum Tentang Status Anak Hasil Nikah Siri Dan Anak Di Luar Kawin Kaitannya Dengan Hak-Hak Keperdataan," *Familia: Jurnal Hukum Keluarga* 4, no. 1 (2024): 20–33, <https://doi.org/https://doi.org/10.24239/familia.v4i1.84>.

³⁵ Huub de Jonge, *Madura Dalam Empat Zaman: Pedagang, Perkembangan Ekonomi, Dan Islam* (Jakarta: Gramedia, 1989).

³⁶ Ahmad Rofiq, *Hukum Islam Di Indonesia* (Jakarta: Gramedia, 2017).

of Islamic Law (KHI). The requirements for practicing polygamy are stipulated in the Compilation of Islamic Law, specifically in Chapter IX titled "Marrying More Than One Wife." Article 55 states: 1. A man may have more than one wife at the same time, but no more than four; 2. The primary requirement for having more than one wife is that the husband must be able to treat his wives and children fairly; and 3. If the primary requirement mentioned in paragraph (2) cannot be met, the husband is prohibited from having more than one wife. Article 56 states: 1. A husband who wishes to have more than one wife must obtain permission from the Religious Court; 2. The submission of the application for permission referred to in paragraph (1) shall be carried out in accordance with the procedures outlined in Chapter VIII of Government Regulation No. 9 of 1975; and 3. A marriage entered into with a second, third, or fourth wife without the Religious Court's permission has no legal force.

Siri polygamy practitioners found the first wife's consent the most difficult requirement. They place siri wives in residential complexes where community life is individualistic. Wives in "*siri*" polygamy agree to become second wives because they feel treated as genuine wives by their husbands, and some receive extra attention.³⁷ "My husband bought me a house and divides his time fairly between his first wife and me; if he has work duties in the city, he stays at my house, and if his duties are finished and the village community needs him, he stays with his first wife." Although to date, he has not sought permission for polygamy from the Religious Court due to certain factors, and according to my husband, he is still waiting for the right time.³⁸

The husband claimed siri polygamy is religiously valid and he is committed to protecting the dignity of women and children. He practiced it with his first wife's knowledge she initially disapproved but later accepted after he had two children with the second wife. An official permit has not yet been submitted to the Religious Court because other regulations require his employer's

³⁷ Ibu D, wawancara dengan peneliti pada tanggal 1 Desember 2025.

³⁸ Ibu E, Wawancara dengan peneliti pada tanggal 6 November 2025.

permission for polygamy.³⁹ Siri polygamy is also practiced due to the husband's status as a prominent figure in the community; he possesses greater economic means, but to spare the first wife's feelings and prevent jealousy, he does not disclose the arrangement openly. Another factor is his desire to avoid domestic conflict with his first wife, as he attributes his economic success to her support. The act of polygamy committed by the husband tends to be known by the secret wife, and she agrees to become the second wife because of the temporary responsibilities undertaken by her secret husband.

4. Social and Legal Implications of Siri Polygamy on Women's and Children's Rights.

Observations and in depth interviews with religious and community leaders in Madura reveal several factors contributing to siri polygamous marriages. The most dominant are: First, the difficulty of obtaining permission for polygamy from the first wife; Second, the desire of some men to marry if their first marriage fails to produce children or to have more children; and third, the perpetrators' belief that siri polygamy is permissible under Islam. To expedite and simplify the process of marrying a second wife, they disregard the legal requirements and procedures for polygamy under Indonesian law.

Siri polygamy has been persisting in Bangkalan despite state non-recognition. Indonesian Salafis promote it as a Qur'anic mandate and prophetic practice to avoid adultery.⁴⁰

Polygamy practiced without official registration often creates difficulties for the wives and children involved, as their status is not legally recognized. In addition, siri polygamy often leads to uncertainty regarding financial and inheritance rights. Under Indonesian law, polygamy is governed by Law No. 1 of 1974 on Marriage and the Compilation of Islamic Law (KHI). Under these laws, a man may marry more than one woman, provided he has his first wife's consent and the permission of a religious court. If conducted without proper legal

³⁹ Bapak F tokoh, Wawancara dengan peneliti pada tanggal 6 November 2025.

⁴⁰ Sumanto Al Qurtuby and Saudi Arabia, "Between Polygyny and Monogamy," *Al Jamiah* 60, no. 1 (2022): 29–62, <https://doi.org/10.14421/ajis.2022.601.29-62>.

procedures, such a marriage may be deemed invalid and could lead to issues regarding inheritance rights, children's rights, or other rights of the wife. Some members of society view siri polygamy as part of normal life, even though it endangers women and children.⁴¹

According to H. Muchsin, child protection has three legal aspects. First, state administrative law covers citizenship and civil registration birth certificates, adoption records and administrative order. In secret marriages without a marriage certificate, the child cannot obtain a birth certificate, as requirements include parents' KTP, KKS, and marriage certificate. The local Civil Registry and Population Office. may issue a birth certificate without requiring the father's marriage certificate or ID card; however, the birth certificate will state that the child is the mother's child, without mentioning the father's name.⁴²

Second, civil law protects the child's rights in religion, health, education, and social welfare. However, without a marriage certificate, paternity cannot be established, making support, education, and inheritance rights inaccessible. As stipulated in Article 42, which stated that "A legitimate child is a child born within or as a result of a valid marriage." Furthermore, Article 43 states: (1) A child born out of wedlock has civil relations only with his or her mother and the mother's family; (2) The status of such a child as referred to in paragraph (1) above shall be further regulated by a Government Regulation.

Third, protection under criminal law encompasses protection against acts of violence and discrimination, as well as protection under criminal law provisions. Protection against acts of violence and discrimination can be elaborated as follows: forms of failure to fulfill children's rights already constitute acts of violence against children. Violence here includes: physical, psychological, and verbal abuse.

⁴¹ H. Nasution and AR. Muchtar, "Negotiating Islamic Law: The Practice of Inheritance Distribution in Polygamous Marriages in Indonesian Islamic Courts," *Al Manahij: Jurnal Kajian Hukum Islam* 18, no. 1 (2024): 125–144.

⁴² H. Muchsin, "Perlindungan Anak Dalam Perspektif Hukum Positif (Tinjauan Hukum Administrasi Negara, Hukum Perdata, Dan Hukum Pidana)," *Varia Peradilan* 26, no. 308 (2011): 23.

5. Motives and Dimensions of Siri Polygamy in Madura.

Aspects of Siri polygamous Marriages in Madura Secret marriages conducted by some members of the Madurese community violate the provisions of Islamic law applicable in Indonesia (Marriage Law No. 1 of 1974 as amended by Law No. 16 of 2019 and the Compilation of Islamic Law under Presidential Instruction No. 1 of 1991) Since these siri polygamous marriages are invalid and not recognized by the state, they lack legal protection; the parties do not have the legal status of a legitimate husband and wife, and the rights of women and children are not protected in the event of legal violations committed by the secret husband. It has been found that men who engage in siri polygamous marriages in Madura do so initially because they cannot meet the requirements for a polygamy permit, particularly the consent of the first wife. A husband's seriousness in siri polygamy can be assessed by his housing provision. If he gives a permanent residence to his secret wife, Maduran leaders consider it *e kabenthal patheh* sincere religious devotion and commitment to permanent union. If she is housed in a rented home, it suggests mere momentary pleasure, lacking legal protection and welfare for the woman.

Polygamy illustrates how women are constantly required to use their reproductive organs to conceive, give birth, and breastfeed. At the same time, men can view it as unlimited recreation and pleasure, moving from one woman to another, because male reproduction is a very brief process (erection, penetration, and ejaculation) and always ends in pleasure.⁴³ Furthermore, the informal nature of unregistered marriages adversely affects the status of children born from such unions, often resulting in inadequate legal protection for women

⁴³ Yulianti Muthmainnah and Business Ahmad Dahlan, "LOST IN TRANSLATING THE DIVINE MESSAGE Different Perspectives of Indonesian Muslim Feminists on Polygamy Verses in the Qur ' an," *Journal of Indonesian Islam* 19, no. 02 (2025): 303-28, <https://doi.org/10.15642/JIIS.2025.19.2.303-328>.

and children regarding inheritance rights, child support, and legal recognition by the state.⁴⁴

Rented housing for a *siri* wife indicated the marriage is motivated by temporary pleasure, lacking legal welfare for women and children. Madurese culture defines serious intent (*e kabenthal patheh*) as sincere devotion and lifelong commitment, shown through permanent housing and monthly financial support. Another fact is that most women agree to *siri* polygamy because their husbands give them high hopes of living together permanently; however, these hopes sometimes fall short of their expectations.

C. CONCLUSION

The researcher's analysis leads to the following conclusions: first, the husband's seriousness in practicing *siri* polygamy is locally interpreted as a sign of commitment demonstrated by his provision of a permanent residence to his secret wife, the provision of regular financial support and the assurance of a secure future for her and their children; whereas temporary housing tends to raise suspicions about the husband's long-term commitment. Second, the Madurese community views the intention behind serious *siri* polygamy "*e kabenthal patheh*" as a sincere act of worship and a genuine desire to live together, specifically when the husband provides a permanent residence and regular monthly financial support. Third, most women accept *siri* polygamy based on husbands' promises of permanence promises that often fall short. Secret marriages practiced by some members of Madurese society violate the provisions of Islamic law applicable in Indonesia (Marriage Law No. 1 of 1974 as amended by Law No. 16 of 2019 and the Compilation of Islamic Law under Presidential Instruction No. 1 of 1991). *Siri* polygamy's state invalidity leaves couples without legal status and denies women and children protection from violations by their secret husbands.

⁴⁴ Zainal Azwar, "Child Filiation and Its Implications on Maintenance and Inheritance Rights: A Comparative Study of Regulations and Judicial Practices in Indonesia, Malaysia, and Turkey," *Journal of Islamic Law* 5, no. 1 (2024): 62–85.

REFERENCES

- (LPMQ), Lajnah Pentashihan Mushaf Al-Qur'an. "Qur'an in Word." Badan Litbang dan Diklat Kementerian Agama RI, 2019.
- Achmad, Zakki Adhliyati; "Melacak Keadilan Dalam Regulasi Poligami: Kajian Filsafat Keadilan Aristoteles, Thomas Aquinas, Dan John Rawls." *Undang: Jurnal Hukum* 2, no. 2 (2019): 409–31. <https://doi.org/10.22437/ujh.2.2.409-431>.
- Ahmad Rofiq. *Hukum Islam Di Indonesia*. Jakarta: Gramedia, 2017.
- Al-Maraghi, Ahmad Mustafa. *Tafsir Al-Maraghi, Vol. 5*. Beirut: Dar al-Fik, n.d.
- Al-Qurtubi, Muhammad ibn Ahmad. *Al-Jami' Li Ahkam Al-Qur'an*. Beirut: Dar Ihya' al-Turats al-'Arabi, 1985.
- Anselm Strauss, and Juliet Corbin. *Dasar-Dasar Penelitian Kualitatif Tatalangkah Dan Teknik-Teknik Teoritisasi Data*, Terj. Muhammad Sodik Dan Imam. Yogyakarta: Pustaka Pelajar, 2023.
- Anshary, M. *Hukum Perkawinan Indonesia (Masalah-Masalah Krusial)*. Yogyakarta: Pustaka Belajar, 2010.
- Awang, Nurulbahiah. "The Right Concept and Application of Polygamous Marriage in Malaysia : An Analysis to the Role of Court under the Provision of Islamic Family Law (Federal Territories) Act 1984." *Al-Aḥwāl: Jurnal Hukum Keluarga Islam* 17, no. 1 (2024): 58–70. <https://doi.org/10.14421/ahwal.2024.17104>.
- Azwar, Zainal. "Child Filiation and Its Implications on Maintenance and Inheritance Rights: A Comparative Study of Regulations and Judicial Practices in Indonesia, Malaysia, and Turkey." *Journal of Islamic Law* 5, no. 1 (2024): 62–85.
- Baihaqi, MahtumridhoGhufron, TitikTriwulanTutik AhmadMusadad A.MuftiKhazin. "Legal Non-Compliance and Kiai Hegemony : The Practice of Unregistered Marriages among the Madurese Muslim Community of Kubu Raya." *Journal of Islamic Law* 5, no. 2 (2024): 242–68. <https://doi.org/Doi.org/10.24260/jil.v5i2.2819>.
- ElizabethS.ScottandRobertE.Scott. "Marriageas Relational Contract,"*Va.L.Rev.*84," 1225, 1998.
- Ermagusti, Erwin, and Rido Putra. "Hadji Agus Salim ' s Islamic Feminism Thoughts and Its Contribution to Contemporary Islamic Studies." *Jurnal AFKARUNA* 20, no. 2 (2024): 225–39.
- Fajar, M. Samson. "Poligami Solusi Islam Mencegah Perselingkuhan Di Era Modern(Studi Hikmah Tasyri'iyah Di Syari'atkanya Poligami Dalam Islam)." *CENDEKIA :Jurnal Penelitian Dan Pengkajian Ilmiah* 1, no. 4

- (2024): 132–46. <https://doi.org/10.62335>.
- Gusti Ketut Ariawan. "Metode Penelitian Hukum Normatif." *Jurnal Fakultas Hukum UNIPAS* 1 No. 1, no. 1 (2022): 2–3.
- H. Nasution and AR. Muchtar. "Negotiating Islamic Law: The Practice of Inheritance Distribution in Polygamous Marriages in Indonesian Islamic Courts." *Al Manahij: Jurnal Kajian Hukum Islam* 18, no. 1 (2024): 125–144.
- Halmi Abdul Halim, Oyo Sunaryo Mukhlas, Atang Abd Hakim. "Pemikiran Hukum Tentang Status Anak Hasil Nikah Siri Dan Anak Di Luar Kawin Kaitannya Dengan Hak-Hak Keperdataan." *Familia : Jurnal Hukum Keluarga* 4, no. 1 (2024): 20–33. <https://doi.org/https://doi.org/10.24239/familia.v4i1.84>.
- Hasbul, Wannibaq. *Perkawinan "Terselubung" Di Antara Berbagai Pandangan*. Jakarta: Golden Terayon Press, 1994.
- Hudaya, Hairul. "Hak Nafkah Isteri (Perspektif Hadis Dan Kompilasi Hukum Islam)." *Muadalah* 1, no. 1 (2013): 11. <https://doi.org/https://doi.org/10.18592/jsga.v1i1.664>.
- Indonesia, Pemerintah. Undang-undang No 1 tahun 1974 Tentang Perkawinan (1974).
- Indonesia, Republik. Instruksi Presiden Nomor 1 Tahun 1991 tentang Kompilasi Hukum Islam (1991).
- Jonge, Huub de. *Madura Dalam Empat Zaman: Pedagang, Perkembangan Ekonomi, Dan Islam*. Jakarta: Gramedia, 1989.
- Madina Dinda Difia, Zezen Zainul Ali, and Mega Puspita. "Aligning Islamic Law And Customary Law: Legal Dialectics In The Tradition Of Forced Marriage In Jambi." *Justicia Islamica: Jurnal Kajian Hukum Dan Sosial* 20, no. 1 (2023): 1–16. <https://doi.org/10.21154/justicia.v20i1.4720>.
- Muchsin, H. "Perlindungan Anak Dalam Perspektif Hukum Positif (Tinjauan Hukum Administrasi Negara, Hukum Perdata, Dan Hukum Pidana)." *Varia Peradilan* 26, no. 308 (2011): 23.
- Mustofa, Kholifatun Nur, Sheila Fakhria, Milla Khumayla Quintana, and Dasrizal Marah Nainin. "Religious Authority and Family Law Reform in Indonesia: The Response and Influence of the Indonesian Ulema Council on Interfaith Marriage." *Juris: Jurnal Ilmiah Syariah* 23, no. 2 (2024): 383–93. <https://doi.org/10.31958/juris.v23i2.11849>.
- Muthmainnah, Yulianti, and Business Ahmad Dahlan. "LOST IN TRANSLATING THE DIVINE MESSAGE Different Perspectives of Indonesian Muslim Feminists on Polygamy Verses in the Qur ' an." *Journal of Indonesian Islam* 19, no. 02 (2025): 303–28. <https://doi.org/10.15642/JIIS.2025.19.2.303->

328.

- Nasution, Emmi Rahmiwita. *Mendesain Penulisan Ilmiah Dalam Penelitian Hukum*. Purbalingga: Eureka Media Aksara, 2024.
- Peter L. Berger and Thomas Luckmann. "The Social Construction of Reality: A Treatise in the Sociology of Knowledge, Repr. in Penguin Books, Penguin Social Sciences." London: Penguin Books, 1991.
- Purnomo, Agus. "Membincang Kembali Praktik Poligami Di Indonesia: Telaah Sosiologi Hukum." *Justicia Islamica* 5 (2025).
- Qurtuby, Sumanto Al, and Saudi Arabia. "Between Polygyny and Monogamy." *Al Jamiah* 60, no. 1 (2022): 29-62. <https://doi.org/10.14421/ajis.2022.601.29-62>.
- RI, Departemen Agama. *Al-Qur'an Dan Terjemahannya City: Bandung*. Bandung: Syaamil Al-Qur'an, 2019.
- RI, Mahkamah Agung. "Permohonan Izin Poligami," n.d. https://pusatdata.badilag.net/perkara/Pencarian_smart/direktoriDataSet_jenis/341.
- Ritonga, Denna. "Polygamy: A Threat or Opportunity to The Islamic Family? (Sociology and Family Law Perspectives)." *Nurani: Jurnal Kajian Syari'ah Dan Masyarakat* 25, no. <https://doi.org/10.19109/nurani.v25i1.27389> (2025). <https://jurnal.radenfatah.ac.id/index.php/Nurani/article/view/27389>.
- RT Husain, AH Wahid, M Ghozali, ZS Ibrahim, M Asaad. "Happiness Permissibility: Negotiating Hadith on Polygamy as Perfection of Worship in Wahdah Islamiyah Muslim Women." *Al-Ihkam: Jurnal Hukum & Pranata Sosial* 19, no. 2 (2024).
- Sadam, ed: Nashih : MUI Digital. "Apresiasi KUHP Baru, Kiai Ni'am Beri Catatan Kritis Soal Pelaku Nikah Siri Dan Poligami Yang Disebut Bisa Dipidana," n.d. <https://mui.or.id/baca/berita/apresiasi-kuhp-baru-mui-beri-catatan-kritis-soal-pelaku-nikah-siri-dan-poligami-yang-disebut-bisa-dipidana?page=4>.
- Supraptiningsih, Umi. "Perlindungan Hukum Anak Dan Istri Dalam Perkawinan Siri Di Kecamatan Proppo Kabupaten Pamekasan." *Al-Ihkam* Vol. 12 No (n.d.). <https://doi.org/10.19105/al-ihkam.v12i2.1479>.
- Suprpto, Bibit. *Liku-Liku Poligami*. Yogyakarta: Al Kautsar, 1990.
- Suryana, Ahmad, Khoirul Hidayah, Doctoral Program, U I N Maulana, and Malik Ibrahim. "Rethinking Marriage Guardians for Widows in Indonesia: Perspective of Legal Certainty and Maslahat Theory." *Justicia Islamica: Jurnal Kajian Hukum Dan Sosial* 22, no. 1 (2025): 71-92.

<https://doi.org/10.21154/justicia.v22i1.9990>.

Syarifuddin, Amir. *Hukum Perkawinan Islam Di Indonesia; Antara Munakahat Dan Undang-Undang Perkawinan*. Jakarta: Kencana, 2011.

Zain, Muhammad. "From Scholarly Exegesis to Instagram ' s Spotlight : The Discursive Representation of Women ' s Subordination in Hadith." *Qudus International Journal of Islamic Studies (QIJS)* 12, no. 2 (2024): 371–420.