

Legal protection for Sancaka train passengers affected by Vandalism Perpetrated by Third Parties

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Abstract

Railways constitute a critical mode of transportation in Indonesia, carrying an obligation to ensure the safety and security of passengers. In practice, acts of vandalism perpetrated by third parties particularly stone-throwing incidents continue to threaten passenger safety. This study examines the legal protection afforded to Sancaka Train passengers who suffer harm as a result of such vandalism, and analyzes the dispute resolution mechanisms available to injured passengers. The research employs a normative juridical method with a conceptual approach, drawing on primary legal materials including consumer protection legislation and railway regulations as well as secondary legal materials derived from legal literature and scientific publications. The findings reveal that legal protection for passengers comprises two dimensions: internal and external protection. Internal protection arises from the contract of carriage between PT Kereta Api Indonesia (Persero) and the passenger, whereas external protection is provided through consumer protection laws and railway regulations. Dispute resolution may be pursued through non-litigation mechanisms such as negotiation and mediation, or through litigation by way of an unlawful act claim pursuant to Article 1365 of the Indonesian Civil Code. The study concludes that although the legal protection framework is comprehensive, its effectiveness remains limited due to the difficulty of identifying perpetrators and ensuring adequate remedies for victims.

Keywords: Railway transportation, legal protection, vandalism

Introduction

Transportation is an essential component of modern society and plays a significant role in supporting economic development, social interaction, and public mobility. As an archipelagic nation with a population exceeding 270 million, Indonesia requires a transportation system that is reliable, safe, efficient, and easily accessible. Among various overland modes of transportation, railways have emerged as one of the most preferred, owing to their capacity to carry large numbers of passengers, maintain relatively stable schedules, and deliver greater efficiency compared to road transport particularly for medium and long-distance journeys. Accordingly, the provision of safe railway services constitutes a matter of public interest that must be guaranteed by service operators.

From a legal standpoint, train passengers are categorized as consumers of transportation services. Consumer protection law recognizes that consumers possess fundamental rights that must be safeguarded throughout the process of using goods and services. Article 4 of Law Number 8 of 1999 on Consumer Protection grants consumers the right to comfort, safety, and security in the consumption of goods and services. These rights are especially pertinent in the transportation sector, where passenger safety is a primary concern given the inherent risks associated with travel activities. Consequently, train passengers are entitled to legal protection whenever their safety or security is jeopardized during the course of transportation services.

Legal protection constitutes a fundamental principle within the concept of the rule of law. According to Satjipto Rahardjo, legal protection entails providing shelter for human rights that have been harmed by others, and such protection is extended to the public so that they may fully enjoy all rights conferred by law. Similarly, Philipus M. Hadjon distinguishes legal protection into internal and

external forms. Internal legal protection arises from the legal relationship established between the parties, while external legal protection is provided through state regulations and law enforcement mechanisms. This distinction is crucial in analyzing passenger protection in railway transportation, as passenger rights may derive both from a contractual relationship with the railway operator and from statutory provisions enacted by the state.

In Indonesia, PT Kereta Api Indonesia (PT KAI) serves as the principal provider of railway transportation services. As a railway operator, PT KAI is legally obligated to ensure the safety and security of passengers throughout their journeys. Article 53 paragraph (1) of Law Number 23 of 2007 on Railways stipulates that railway operators must guarantee the safety and security of railway operations. The obligation to protect passengers is further reinforced by the Minister of Transportation Regulation Number 63 of 2019 on Minimum Service Standards for Passenger Rail Transport, which requires operators to maintain adequate safety and security standards. Despite this comprehensive legal framework, threats to passenger safety continue to manifest in practice. One significant challenge arises from acts of vandalism committed by third parties.

Railway vandalism has been evidenced by incidents of stone-throwing directed at moving trains. Such acts not only damage railway property but also pose serious risks to passengers. On 6 July 2025, the Sancaka Train operating under PT KAI's Regional Division (DAOP) 6 Yogyakarta was pelted with stones by unidentified individuals, resulting in broken carriage windows and passenger injuries. This incident reflects a broader pattern of vandalism against railway transportation in Indonesia, where similar cases continue to threaten passenger safety and disrupt railway operations. Such conduct constitutes not only a criminal offence under railway regulations, but may also give rise to

civil liability pursuant to Article 1365 of the Indonesian Civil Code. The act of stone-throwing against trains is expressly prohibited under Article 180 of Law Number 23 of 2007 on Railways. It may be characterized as an unlawful act (*onrechtmatige daad*) as regulated under Article 1365 of the Civil Code, which provides that every unlawful act that causes harm to another person obliges the perpetrator who is at fault to compensate the resulting loss. According to Munir Fuady, an unlawful act constitutes a body of legal principles aimed at controlling or regulating dangerous conduct, imposing liability for losses arising from social interaction, and providing redress for victims through an appropriate legal action.

Nevertheless, in practice, passengers who suffer harm as a result of third-party conduct frequently encounter difficulties in accessing justice whether due to the lack of clarity regarding available legal mechanisms or the difficulty of identifying the perpetrators of vandalism. This situation necessitates a thorough examination of the forms of legal protection available to passengers, as well as the dispute resolution avenues that may be pursued in bringing claims against third parties as perpetrators of unlawful acts, whether through litigation before the courts or through non-litigation mechanisms.

Based on the foregoing, this study addresses the following research questions: ^[1] What forms of legal protection are available to Sancaka Train passengers who suffer harm as a result of vandalism? And ^[2] What dispute resolution mechanisms may be pursued by Sancaka Train passengers who sustain harm caused by third parties?

Materials and Research Methods

The research method employed in this study is the normative juridical research method, which focuses on examining written legal rules, legal principles, and legal doctrines. This study applies both a statutory approach and a conceptual approach. The statutory approach examines relevant legislation, including Law Number 8 of 1999 on Consumer Protection, Law Number 23 of 2007 on Railways, and the Civil Code, while the conceptual approach emphasizes an understanding of legal concepts, principles, and theories as they apply to consumers who suffer harm in the instant case, and establishes a connection between legal principles and their practical application.

This study utilizes primary legal materials comprising statutes and regulations as well as secondary legal materials, including legal literature, scientific journals, research findings, and expert opinions relevant to the subject matter. Through this methodology, the study endeavors to provide a comprehensive legal analysis of passenger protection and the dispute resolution mechanisms available to victims of railway vandalism under Indonesian law.

Results and Discussion

Forms of Legal Protection for Sancaka Train Passengers Affected by Vandalism

a. Internal Legal Protection

Internal legal protection arises from the contractual relationship between PT KAI and its passengers. Pursuant to Article 1313 of the Civil Code, a contract is formed when one or more parties bind themselves to one another. In the railway context, this legal relationship is established at the moment a passenger purchases a ticket and PT KAI accepts payment an arrangement governed by the principle of *pacta*

sunt servanda, whereby a valid agreement has the force of law between the contracting parties. In the context of carriage, a travel ticket functions not merely as proof of payment, but also as evidence of the existence of a contract of carriage between the carrier and the passenger. Abdul Kadir Muhammad explains that a passenger ticket constitutes a transportation document evidencing an agreement between the carrier and the passenger regarding the provision of transportation services from the point of departure to a specified destination. Accordingly, from the moment a ticket is issued and used by a passenger, a legally binding relationship between PT KAI and the passenger comes into existence.

Train passengers occupy the legal position of consumers as defined under Article 1 point 2 of the Consumer Protection Law, which states that a consumer is any person who uses goods and/or services available in society for personal, family, or other parties' needs, or for the needs of other living beings, and not for the purpose of trade. Sancaka Train passengers use the transportation services provided by PT KAI to meet their mobility needs, thereby satisfying the legal elements of a service consumer. As a business operator, PT KAI bears the obligation to provide transportation services that are safe, secure, comfortable, and in conformity with the service standards prescribed by applicable legislation. This obligation is reflected in Article 53 paragraph (1) of Law Number 23 of 2007 on Railways. Passengers have the right to obtain safety, comfort, security, and adequate service throughout their use of railway transportation services. Such rights are consistent with Article 4 point (a) of the Consumer Protection Law.

The internal protection obligations arising from this legal relationship are manifold. First, PT KAI must guarantee the safety and security of the journey as mandated by Article 53 paragraph (1) of the Railway Law. Second, PT KAI must comply with the Minimum Service Standards (MSS) under Ministerial Regulation PM 63/2019, which encompass safety, security, reliability, comfort, accessibility, and equality. Third, PT KAI must implement Standard Operating Procedures (SOPs) for security management, including patrolling the railway corridor, mapping areas prone to security disturbances, conducting public awareness campaigns for communities residing near the railway tracks, and coordinating with law enforcement agencies to prevent acts that endanger railway operations. Although acts of vandalism committed by third parties fall outside the contractual relationship between PT KAI and its passengers, the existence of such third parties does not extinguish the legal relationship that was established beforehand through the contract of carriage. PT KAI has, in principle, implemented various forms of internal legal protection as required by law. Nevertheless, the occurrence of stone-throwing incidents demonstrates that such protection has not been sufficient to prevent all forms of security disturbances originating from external factors.

From the perspective of legal protection theory, the protection afforded to railway passengers may be classified into preventive and repressive legal protection. According to Philipus M. Hadjon, preventive legal protection aims to prevent the occurrence of legal violations or losses before they arise, whereas repressive legal protection is intended to resolve disputes and restore rights after a violation has occurred. In the context of railway transportation, preventive protection is reflected in PT KAI's obligation to

implement security measures, conduct patrols along railway corridors, monitor areas vulnerable to vandalism, and coordinate with relevant authorities to maintain operational safety. These measures are intended to ensure that passengers can enjoy their right to safety and security during railway transportation services.

Furthermore, the legal position of railway passengers as consumers entitles them to protection under consumer protection principles. Shidarta defines consumer protection as the entirety of legal principles and rules governing the relationship between consumers and business actors in relation to goods and services, while Az. Nasution emphasizes that consumer protection law serves to safeguard consumer interests through legal norms that provide certainty and protection. Consequently, passengers who suffer losses due to vandalism are entitled not only to preventive protection through safety measures but also to repressive protection through complaint mechanisms, compensation claims, and legal remedies available under Indonesian law. Therefore, the occurrence of vandalism against the Sancaka Train should not merely be viewed as a security disturbance but also as an issue of consumer protection requiring adequate legal safeguards for affected passengers.

b. External Legal Protection

External legal protection is protection afforded by the state through legislation to guarantee the rights of legal subjects within a legal relationship. One form of such protection is provided through Law Number 8 of 1999 on Consumer Protection. The existence of this Law demonstrates that consumer protection does not rely solely on the contractual relationship with business operators, but is also directly guaranteed by the state through the regulation of consumer rights and the obligations of business operators. Celina Tri Siwi Kristiyanti contends that the right to safety and security constitutes a fundamental consumer right that must be treated as a priority in the conduct of business activities, given its direct relationship to the protection of consumer interests and well-being. The existence of Article 4 of the Consumer Protection Law provides a legal basis for passengers to obtain protection of their rights as consumers of transportation services. The Consumer Protection Law functions as an instrument of external legal protection that guarantees the recognition and protection of passenger rights when they suffer harm as a result of acts that disrupt safety and security in the use of railway transportation services. Train passengers also receive external legal protection through various specific railway sector regulations.

In the context of passenger protection, one of the most important provisions is Article 53 paragraph (1), which requires railway service providers to guarantee the safety and security of railway journeys. The protection of passengers is therefore not merely a contractual obligation of PT KAI, but also a statutory obligation directly commanded by law. Such protection is further reinforced by Government Regulation Number 56 of 2009 on the Organization of Railways as the implementing regulation of Law Number 23 of 2007 and the Minister of Transportation Regulation Number PM 63 of 2019 on Minimum Service Standards for Passenger Rail Transport. This regulation stipulates that passenger rail services must conform to the Minimum Service Standards that serve as the reference for

railway operators in providing services to the public. From a civil law perspective, acts of vandalism that cause harm to passengers may be characterized as unlawful acts as regulated under Article 1365 of the Civil Code.

The aforementioned Article provides that every unlawful act that causes harm to another person obliges the person who is at fault for such harm to compensate the loss. Rosa Agustina argues that an act may be categorized as an unlawful act if it satisfies five elements, namely: the existence of an act; an unlawful character; fault; harm; and a causal link between the act and the resulting harm.

1. The first element is an act. In this case, the act in question was throwing stones at the operating Sancaka train. This act constituted an active act by the perpetrator and resulted in legal consequences, including broken train windows and injuries to passengers.
2. The second element is the existence of an unlawful nature. After the Hoge Raad decision in the case of *Lindenbaum v. Cohen* in 1919 the meaning of unlawful is no longer limited to violations of laws, but also includes violations of the subjective rights of others, the legal obligations of the perpetrator, morality, and propriety in society. In the case of the Sancaka train, the act of throwing stones not only contradicts the norms of propriety and public safety, but also contradicts the provisions of Law Number 23 of 2007 concerning Railways which prohibits anyone from carrying out acts that can damage or disrupt the safety of train travel.
3. The third element is the presence of fault (*Schuld*). Fault can be intentional or negligent. In the case of the vandalism against the Sancaka train, the act of throwing stones was carried out consciously by the perpetrator, thus fulfilling the element of fault in the form of intent. According to Munir Fuady, a person can be held accountable under Article 1365 of the Civil Code if there is an element of fault that can be accounted for and their actions cause harm to another party.
4. The fourth element is the existence of harm. The harm in this case is not only the material loss suffered by PT KAI due to the broken train window, but also the loss suffered by passengers in the form of physical injuries, fear, and disruption to comfort during the journey. Under civil law doctrine, these losses can form the basis for a claim for compensation if they can be proven to be related to the perpetrator's actions.
5. The fifth element is a causal relationship (causal verband) between the act and the loss. A causal relationship is necessary and the loss. A causal relationship is necessary to establish that the losses suffered by the victim resulted directly from the perpetrator's conduct. In the Sancaka train case, there is a clear causal relationship between the stone throwing, the broken train window, and the injuries suffered by the passengers. Without the stone throwing, the loss suffered by the victim would not have occurred. Therefore, the causal relationship element in Article 1365 of the Civil Code is fulfilled.

Such protection is manifested not only through recognition of victims' rights, but also through provisions governing the liability of perpetrators, mechanisms for compensation, and criminal sanctions for parties who engage in conduct that endangers railway safety. Accordingly, from a regulatory

perspective, there is no legal vacuum that would cause victims to lose their legal basis for obtaining protection. In cases of vandalism against the Sancaka Train, one of the principal obstacles that frequently arises is the difficulty of identifying the perpetrators of stone-throwing.

Acts of vandalism against trains are generally carried out spontaneously, occur within a very short timeframe, and take place in areas far from the direct supervision of law enforcement officers. These conditions mean that the process of tracing perpetrators frequently requires a considerable amount of time. On the other hand, victims of vandalism also often find it difficult to obtain direct compensation from the perpetrators. These circumstances indicate that the primary challenge in providing legal protection to victims of Sancaka Train vandalism lies not in the absence of regulation, but rather in the aspects of implementation and law enforcement.

External legal protection for victims of Sancaka Train vandalism is from a normative standpoint, already available through various complementary legal instruments. However, the implementation of such protection continues to face obstacles in the identification of perpetrators and the enforcement of legal accountability against those responsible for the harm caused. As a result, victims frequently experience difficulty in obtaining direct compensation, even though this right is guaranteed by applicable legislation.

Dispute Resolution Mechanisms Available to Sancaka Train Passengers Harmed by Third Parties

Non-Litigation Dispute Resolution

Non-litigation dispute resolution constitutes a mechanism for resolving disputes outside the courts, based on the mutual agreement of the parties. Non-litigation resolution generally prioritizes the recovery of the victim's losses over the punishment of the perpetrator, thereby providing a resolution that is faster, simpler, and less costly than judicial proceedings.

a. Negotiation

Negotiation is a form of dispute resolution conducted directly by the parties without the involvement of a third party as a mediator. According to Takdir Rahmadi, negotiation is a process of communication between disputing parties aimed at reaching an agreement regarding the resolution of the problem at hand. Negotiation may be pursued if the stone-throwing perpetrator is successfully identified and is willing to accept responsibility for their actions. Through negotiation, the victim may convey claims relating to the losses sustained whether in the form of medical expenses, material losses, or other losses that arise directly as a result of the act of vandalism. In turn, the perpetrator may express willingness to provide compensation or other forms of restitution to the victim. However, the effectiveness of negotiation depends heavily on the perpetrator's willingness to acknowledge their actions and accept responsibility for the resulting harm. If the perpetrator refuses to accept responsibility or no agreement can be reached, resolution through negotiation becomes difficult to achieve.

b. Mediation

Mediation is a process of dispute resolution conducted with the assistance of a neutral third party known as a mediator.

Mediation may be pursued if both the victim and the perpetrator are willing to resolve the matter outside of court. Through mediation, the parties may agree upon various forms of resolution, such as the payment of compensation, reimbursement of medical expenses, a written apology, or other mutually agreed-upon forms of restitution. Mediation has the advantage of preserving the social relationship between the parties and avoiding judicial proceedings, which tend to be time-consuming and costly. Nevertheless, as with negotiation, the success of mediation ultimately depends on the willingness of the parties to reach an agreement.

In addition to negotiation and mediation, dispute resolution outside the court may also reflect the principles of restorative justice, which emphasize the restoration of losses suffered by victims and the accountability of offenders. Restorative justice seeks to achieve a balanced resolution by involving the parties directly affected by the unlawful act. In cases of railway vandalism, restorative approaches may encourage offenders to acknowledge the consequences of their actions, provide compensation for damages, and participate in efforts aimed at preventing similar incidents in the future. Such an approach is considered beneficial because it focuses not only on legal accountability but also on repairing the social harm caused by the offense. Furthermore, non-litigation dispute resolution is consistent with the principle of consumer protection, which encourages the settlement of disputes through simple, fast, and affordable mechanisms. For passengers who suffer losses due to acts of vandalism, non-litigation mechanisms may provide a practical means of obtaining compensation without the lengthy procedures associated with court proceedings. However, the effectiveness of these mechanisms remains dependent upon the successful identification of the perpetrator and the existence of good faith on the part of the offender to participate in the resolution process. Where these conditions cannot be fulfilled, non-litigation efforts may be insufficient to guarantee the restoration of the victim's rights and losses.

Litigation Dispute Resolution

One of the litigation avenues available to Sancaka Train passengers who sustain harm as a result of vandalism is the filing of an unlawful act claim pursuant to Article 1365 of the Civil Code. This avenue may be pursued if the identity of the vandalism perpetrator is successfully ascertained and there exists demonstrable harm resulting from their actions. By means of such a claim, victims may seek civil accountability from the perpetrator for losses arising from the act of stone-throwing against the train. In the case of vandalism against the Sancaka Train, passengers who sustain injuries from broken glass or who suffer other losses arising directly from the stone-throwing act possess a real and actual legal interest. The losses they sustain place victims in the position of parties directly affected by the perpetrator's conduct. Accordingly, victims have legal standing to bring a civil action against the vandalism perpetrator. In filing a claim under Article 1365 of the Civil Code, it is not sufficient for the victim to merely demonstrate that harm has been sustained. The victim must also prove that the harm is a consequence of an unlawful act committed by the defendant.

The act of stone-throwing against the Sancaka Train satisfies the elements of an unlawful act: the existence of an

act; an unlawful character; fault; harm; and a causal link between the act and the resulting harm. Evidence that may be used to support the claim includes incident reports, documentation of damage, victims' medical records, witness testimony, and any other evidence demonstrating the perpetrator's involvement in the act of vandalism. If all the elements of an unlawful act are proven, the victim is entitled to seek compensation from the perpetrator.

In the case of vandalism against the Sancaka Train, compensation claims may take the form of material losses directly suffered by the victim for example, medical expenses arising from injuries sustained, the cost of ongoing treatment, transportation costs associated with the medical process, or other losses that can be directly and demonstrably attributed to the perpetrator's actions. Immaterial losses generally relate to suffering, discomfort, fear, or psychological disturbance experienced by the victim as a result of an unlawful act. Both non-litigation and litigation avenues have their respective advantages and disadvantages. Non-litigation offers a faster, less costly, and more flexible resolution, but is highly dependent on the perpetrator's good faith. Litigation, on the other hand, provides stronger legal certainty through a binding court judgment, but requires a longer timeframe and greater expense. The effectiveness of both avenues is ultimately contingent upon the successful identification of vandalism perpetrator as the party liable for the victim's losses.

From the perspective of civil liability, litigation serves as a form of repressive legal protection aimed at restoring the rights of parties who have suffered losses as a result of unlawful conduct. According to the theory of legal protection proposed by Philipus M. Hadjon, repressive legal protection is provided after a legal violation has occurred and is intended to resolve disputes through legal mechanisms capable of restoring the injured party's rights. In this regard, a civil action based on Article 1365 of the Civil Code constitutes an important legal instrument through which victims may seek compensation for both material and immaterial damages arising from acts of vandalism. The availability of such legal remedies reflects the commitment of the legal system to ensuring that victims are afforded access to justice and effective protection of their legal interests.

Nevertheless, the practical implementation of litigation in vandalism cases frequently encounters significant obstacles. The primary challenge lies in identifying and locating the perpetrator, as many incidents of stone-throwing against trains are committed by unknown individuals and occur within a very short period of time. Even where losses suffered by passengers can be clearly demonstrated, legal proceedings cannot be effectively pursued without sufficient evidence establishing the identity and responsibility of the offender. Therefore, strengthening surveillance systems, increasing security patrols, and enhancing cooperation between PT KAI, law enforcement authorities, and local communities are essential measures to support the effectiveness of litigation mechanisms and to ensure that victims are able to obtain legal remedies for the losses they have suffered.

Conclusion

This study concludes that the legal protection afforded to Sancaka Train passengers who sustain harm as a result of

vandalism perpetrated by third parties comprises both internal and external legal protection. Internal legal protection arises from the legal relationship between PT Kereta Api Indonesia (PT KAI) and passengers through the contract of carriage, as evidenced by the travel ticket. This legal relationship gives rise to mutual rights and obligations, whereby PT KAI is bound to guarantee safety, security, and service quality in accordance with applicable minimum service standards. External legal protection, on the other hand, is provided through various legislative instruments in particular Law Number 8 of 1999 on Consumer Protection, Law Number 23 of 2007 on Railways, Government Regulation Number 72 of 2009 on Railway Traffic and Transport, and Minister of Transportation Regulation Number PM 63 of 2019 on Minimum Service Standards for Passenger Rail Transport.

Furthermore, the dispute resolution mechanisms available to Sancaka Train passengers who suffer harm from vandalism committed by third parties may be pursued through either non-litigation or litigation channels. Non-litigation avenues encompass negotiation and mediation, while the litigation route may be pursued through an unlawful act claim pursuant to Article 1365 of the Civil Code to obtain compensation for losses caused by the vandalism perpetrator.

Based on the analysis, the non-litigation avenue is considered more effective where the perpetrator can be identified and demonstrates good faith in accepting responsibility, as the process is faster, simpler, and less costly.

Conversely, the litigation avenue provides stronger legal certainty through a court judgment, albeit at the expense of greater time and cost. Accordingly, the effectiveness of passenger protection depends not only on the availability of legal remedies, but also on their implementation, as well as preventive measures, law enforcement, and cooperation among PT KAI, the government, and the public. In addition, this study demonstrates that acts of vandalism against railway transportation should not merely be regarded as ordinary criminal acts, but also as issues of consumer protection and transportation safety that directly affect passengers' rights. Therefore, stronger preventive measures are required, including enhanced security monitoring along railway corridors, increased public awareness regarding the dangers and legal consequences of vandalism, and closer coordination between PT KAI and law enforcement authorities. Such measures are expected to reduce the occurrence of similar incidents and strengthen legal protection for railway passengers in Indonesia.

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