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The Form of Reference and the Function of Speech Act in the Verdict of Blasphemy in Indonesia: Forensic Pragmatics Study

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Abstract

Language use in religious blasphemy cases is rarely neutral, as utterances directed at sacred figures, texts, or communities are interpreted through context, intention, and communal reception rather than literal form alone. While such cases recur across Indonesia's public, digital, and judicial settings, forensic pragmatic studies remain limited, typically treating referent forms and speech act functions separately and relying more on social media data than on legally binding court decisions. This study integratively examines both referent forms and speech act functions within a single final verdict, Sanana District Court Decision No. 20/Pid.B/2020/PN Snn, analyzing six quoted utterances through referent form and speech act theory. The utterances target three referent categories: a religious figure, a sacred text, and a religious community realized through direct naming and, in one case, metonymic displacement. Functionally, all six utterances are assertive, a homogeneity showing *that all six utterances are truth-apt claims about sacred referents rather than requests, promises, or expressions of feeling. Within this shared force, four sub-strategies are identified. In this case they align with the type of referent: utterances about the Prophet use evaluative predication or first-person report, utterances about the Qur'an use fabricated numerical proportions, and the single utterance about a religious community uses universal quantification. As a single-decision study, it reports a case-specific pattern: referent type and speech-act strategy are associated in these data. The pattern is offered as a hypothesis to be tested on larger corpora and as a starting point for reading indirectly phrased utterances in context.*

1. Introduction

Recent developments in social communication practice suggest that the use of language is no longer neutral, but is often loaded with ideological and emotional content (Sukrin, 2025). This view is in line with critical pragmatic studies, which argue that interpersonal speech routinely carries ideological values that cannot be fully explained through pragmatic analysis alone, and thus requires closer attention to how discourse and power intertwine (Mardiana et al., 2021). This view is consistent with the pragmatic principle that meaning is not only inherent in linguistic forms, but is constructed together through the relationship between speech, context, and shared knowledge between the speaker and the speaking partner (Yule, 1996).

Therefore, one expression or referential predicate can carry evaluative or ideological weight that goes far beyond its literal semantic meaning. One of the phenomena that highlights the non-neutrality of this language in the legal realm is the blasphemy case, which is when a statement is made, disseminated, and interpreted as a form of insult or desecration of a religious symbol, teaching, or community of a legal category that has been in effect in Indonesia since 1965 and continues to bring potential social conflicts because the criteria of language categorized as blasphemy are still debated (Nalle, 2017).

This phenomenon shows that the meaning of a speech is not only determined by its linguistic form, but also by the context, intentions of the speakers, and the interpretation of the community (Mustakim et al., 2026). It is this contextual and intentional dimension of meaning that forensic linguistics is tasked with reconstructing when a speech becomes the object of a legal dispute (Olsson, 2008). In many cases, differences in interpretation of a speech can trigger social conflicts as well as legal consequences (Shuy, 1993).

Blasphemy cases in Indonesia have been repeated in various eras and through various media, ranging from oral statements in public spaces and print media to the content of digital platforms (Mantri, 2022). Some cases have even attracted widespread public attention, such as those involving public figures who were processed by religious organizations and law enforcement officials (Akbar, 2019; Irwansyah & Fitriani, 2025), as well as cases whose media coverage has helped shape public perception of the defendant (Setiabudi et al., 2022). The recurrence of this phenomenon shows that blasphemy is not just a stand-alone legal event, but also a linguistic phenomenon that deserves in-depth research.

In the legal context, what is in question is not only physical actions, but also verbal actions that are realized through speech or statements. This shows that language functions not only as a means of communication, but also as a form of action with legal implications (Shuy, 2008). Language plays a central role in the field of law because the entire legal process is conveyed, interpreted, and decided through language (Subyantoro, 2019). From the investigation stage to the trial and court verdict, language is the primary medium for explaining events, building arguments, presenting evidence, and formulating judicial considerations (Olsson, 2008). Language is an integral part of the legal system, as law is essentially built through linguistic texts and interpretations (Gibbons, 2003).

Given the diversity of religions in Indonesian society, the issue of blasphemy is very sensitive because it intersects with the beliefs and values embraced by a community (Adnan, 2023). According to the Great Dictionary of Indonesian Language (KBBI), the word blasphemy means insulting or degrading, while blasphemy refers to the process,

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method, or act of doing it. Blasphemy can be interpreted as an act or expression that insults, degrades, or harasses a religion, teachings, symbols, or figures, and can also be understood as the deliberate spread of hatred, both verbal and written, in public that offends other parties (Hatta & Husni, 2021). Then the factors behind blasphemy can also be traced through the lens of religious exposition, which shows that this issue carries a theological as well as a social dimension (Alwi & Hakim, 2025). From a communication perspective, blasphemy behavior reflects the identity of the perpetrator (Yanti et al., 2019) and a person's statement can be key evidence in court to determine whether there is an element of contempt, hatred, or hostility to a religion (Coulthard & Johnson, 2007).

In recent years, cases of blasphemy have increasingly appeared, many of which are related to speech in public spaces and social media, in line with the increasing cases of religious intolerance in society ranging from discriminatory treatment of religious minority groups, restrictions on worship, prohibitions on the establishment of houses of worship, to attacks on places of worship. Research by the Wahid Institute (2017) recorded 213 incidents of religious intolerance in Indonesia throughout 2017, and indications of similar intolerance were also reported by the Setara Institute (2011), the Indonesian Conference on Religion and Peace/ICRP (2011), the Institute for Islamic and Peace Studies/LaKIP (2011), the Center for Religious and Cultural Studies (CRCS) of Gadjah Mada University (2013), and the Center for Islamic and Community Studies (PPIM) UIN Syarif Hidayatullah (2017). This condition is considered ironic considering that Indonesia is a nation founded on Pancasila with the principle of the One Godhead, and as an archipelagic country with a diversity of languages, religions, and ethnicities, the threat of division due to careless speech remains a real challenge (Rosyad et al., 2022).

In pragmatic studies, the meaning of a speech is often shaped by the context of its use, communicative purpose, and shared knowledge between the speaker and the speech partner (Yule, 1996), so that a speech can carry an implicit meaning, irony, or contextual meaning that is different from the literal meaning of the principle that applies even to nonverbal texts such as poetry, whose meaning requires attention to context and function, not just the literal meaning of word for word (Akastangga et al., 2024). A speech can be considered to contain insults or attacks on religious symbols and teachings not only based on its linguistic form, but also the meaning that arises from its context (Searle, 1979). In the study of speech actions, the form of sentences used by the speaker, both the referent mentioned and the illocution function attached to it, is the key to revealing the communicative intention behind a speech (Lyons, 1977).

Research on blasphemy and hate speech has developed from a variety of perspectives, ranging from forensic and sociopragmatic linguistics to semantics-pragmatics. Studies of the form of reference in blasphemy, for example, have been conducted by Nasution et al. (2026), Adelawati and Arimi (2025), Akastangga et al. (2024), Imran et al. (2024), and Aljanabi and Jabir (2024), which uncover various forms of insults aimed at divinity, prophethood, religious rituals, and scripture (Nasution et al., 2026; Adelawati & Arimi, 2025; Akastangga et al., 2024;) Imran et al., 2024; Aljanabi & Jabir, 2024).

These studies also reveal violations of the norm of politeness used to convey misinformation, maintain self-image, and refute accusations, which are manifested through indirect speech and subtle innuendo (Carney, 2014); Nieto, 2020; (Fadhilah & Arimi, 2024; Taha et al., 2024). While Chernyshova (2019) found that the act of assertive

speech is used to handle conflicting texts in cases of insult and defamation (Chernyshova, 2019). Forensic linguistic studies on blasphemy cases have also been carried out in various cases in Indonesia, such as hate speech related to statements about the revision of Qur'an verses (Lailiyah, 2022), alleged blasphemy in podcast (Susilowati et al., 2023), and allegations of religious coercion (Iswari & Utami, 2025).

Regarding the function of speech, research by Budiman et al. (2026), Syahid et al. (2022), and Akastangga et al. (2024) identified expressive, directive, and assertive functions as the dominant functions in speech that contain religious defamation, including insults to certain religious concepts and processions (Budiman et al., 2026; Syahid et al., 2022; Akastangga et al., 2024). Meanwhile, Fanani et al. (2025) reveal speech strategies used to protect self-image and deny accusations in criminal cases in the realm of online hate that intersect with religious and political issues and Fanani et al. (2025) also found a pattern of negative judgment in public social media comments (Fanani et al., 2025).

However, there are still some important gaps. First, research that applies a pragmatic approach to forensic blasphemy cases is still relatively limited compared to its application to defamation cases (Aljanabi & Jabir, 2024; Fadhilah & Arimi, 2024). Second, this kind of study tends to examine the form of reference and the function of speech separately, so the relationship between the two in constructing blasphemy statements has not been thoroughly captured. Third, most studies use data from social media platforms such as Facebook, TikTok, and YouTube, while court decisions that have permanent legal force (inkrah) that authentically and completely contain quoted statements, case chronologies, and judicial considerations are still rarely used as data sources (Nasution et al., 2026).

Based on these gaps, this article examines referent form and speech-act function together in a single decision that has permanent legal force (*inkrah*): Sanana District Court Decision No. 20/Pid.B/2020/PN Snn. Three research questions guide the analysis: (1) which referent categories do the utterances adjudicated as blasphemy in this decision target, and how are they realized; (2) which speech-act function do these utterances perform, and through which sub-strategies; and (3) how is the type of referent associated with the sub-strategy used? The study aims to describe the referent forms and speech-act functions of these utterances and to examine whether the two are related in this case.

The study makes three modest contributions. Empirically, it describes the language of one blasphemy verdict using the court decision itself as primary data, rather than social media content. Analytically, it proposes, as a hypothesis for further testing, that the ontological type of a referent is associated with the type of assertive strategy used to denigrate it. Practically, it offers forensic linguists a starting point for reading indirectly phrased utterances in context. The analysis draws on reference theory (Lyons, 1977) and speech act theory (Searle, 1979).

Reference form theory and speech act theory address two analytically distinct but interdependent questions. Reference theory (Lyons, 1977) concerns what a linguistic expression points to the entity, object, or group as an utterance designates in the world outside of language. Speech act theory (Searle, 1979), by contrast, concerns what the speaker does through that designation, whether the utterance states, commands, promises, expresses, or declares.

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An utterance referent and its illocutionary force are not independent choices made separately by the speaker; rather, the ontological nature of the referent constrains which illocutionary strategies are discursively available to characterize it. A person-type referent, for instance, can be the subject of character predication in a way a text cannot, while a text-type referent can be subjected to claims about its content or proportions in a way a person cannot. This study therefore treats reference form and speech act function not as two separate analytical layers to be reported side by side, but as structurally linked dimensions of a single communicative act, a relationship this article investigates empirically rather than assumes.

2. Method

This study uses a descriptive qualitative design with a case study approach, which is used to explore and understand the meaning that emerges from a social or humanitarian problem through textual or verbal data analysis (Creswell, 2014). This design is seen as appropriate because the study focuses on the interpretation of the form, function, and meaning of language in one particular legal case, not on statistical calculations. The approach used is forensic linguistics, which is the study of language in a legal context, especially the use of language as evidence in judicial proceedings (Butar-Butar, 2025). In this study, the approach was applied to analyze the form of reference and the function of speech found in speech that was considered as an element of the crime of blasphemy.

The research data is in the form of a linguistic form of the defendant's statement that is considered relevant to the criminal elements of blasphemy in the court decision. The source of the data is a court decision that has permanent legal force (inkracht van gewijsde), namely the Sanana District Court Decision No. 20/Pid.B/2020/PN Snn, which was obtained from the Official Decisions Directory of the Supreme Court of the Republic of Indonesia. This decision was selected based on several criteria: (1) related to the blasphemy or defamation case; (2) it has permanent legal force; (3) it contains verbatim excerpts from the defendant's statement considered in the court's reasoning; and (4) the statement is declared relevant for the fulfillment of the elements of the criminal act in the consideration and/or court decision.

The full text of Decision No. 20/Pid.B/2020/PN Snn was read in its entirety to identify every verbatim quotation of the defendant's statements appearing in the indictment, witness testimony, and the panel's legal reasoning. This reading identified six such quotations across the three incidents described in the case chronology, the complete set of the defendant's statements quoted verbatim and treated as evidentiary content in the decision. All six satisfied the four selection criteria listed above; consequently, the data in this study do not represent a sample drawn from a larger pool of candidate utterances, but the exhaustive set of verbatim statements available within this single decision.

This distinction matters methodologically: the findings reported below describe the full population of quotable utterances in this case, not a researcher-selected subset, which strengthens the internal validity of the case-specific patterns identified while still requiring the caution discussed in the Limitations regarding generalization beyond this case.

The data classification guidelines refer to two theoretical frameworks, namely the theory of the reference form of Lyons (1977) to identify the categories of referent in speech. Four referent categories were operationally defined as follows. Direct personal reference denotes an utterance in which a proper name or definite noun phrase identifies the referent without requiring information beyond the sentence itself (e.g., "the Prophet Muhammad"). Indirect/metonymic personal reference denotes an utterance in which the referent is invoked through an associated category term (e.g., an ethnonym) whose identity as a substitute for a specific person can only be recovered from the preceding co-text.

Sacred text reference denotes an utterance in which a named scripture is the grammatical subject or object of a predication concerning its content, origin, or proportion. Religious community/group reference denotes an utterance in which the referent is a collective noun phrase designating members of a religious authority structure or affiliation, rather than a single individual or text. These four categories are not drawn ready-made from Lyons (1977), whose framework addresses reference in the abstract; rather, they were derived inductively from the data through iterative comparison, using Lyons' distinction between direct and indirect reference as the organizing principle.

The theory of speech actions of Searle (1979) which includes assertive, directive, expressive, commissive, and declarative speech actions to identify the illocution function of each statement. Classification followed Searle's (1979) felicity conditions for assertive speech acts, under which an utterance qualifies as assertive if it satisfies three conditions: (1) the *propositional content condition* — the utterance predicates a state of affairs about some entity; (2) the *sincerity condition* — the speaker is committed to believing the proposition true; and (3) the *essential condition* — the utterance counts as the speaker's commitment to the truth of what is expressed, rather than an attempt to get the hearer to act (directive), a commitment to future action (commissive), an expression of psychological state alone (expressive), or an institutional change brought about by the utterance itself (declarative).

Each of the six data was tested against these conditions independently by the researcher and cross-checked against the court's own characterization of the statement in its legal reasoning. All six satisfied with the assertive conditions: each predicates a state of affairs about a religious referent and is treated, both by the speaker's framing and by the court, as a truth-apt claim rather than a command, promise, feeling, or institutional act. For terminological consistency, this study uses *assertive* throughout, following Searle's (1979) later and more widely adopted label for this category.

Having established that all six utterances share the same illocutionary force, a finer-grained sub-classification was needed to capture variation *within* this shared assertive function. Because Searle's (1979) taxonomy does not itself subdivide the assertive category according to rhetorical strategy, the four sub-strategies reported in this study were derived inductively through close reading of each datum's internal structure specifically, how the proposition was framed (as direct predication, numerical claim, autobiographical report, or group-level generalization) rather than deduced from a pre-existing framework. This inductive step follows standard qualitative content analysis procedure (Creswell, 2014): categories were provisionally assigned to each datum,

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compared across data for structural similarity, and consolidated into four non-overlapping sub-strategies once saturation was reached across the six data.

Data is collected using documentation, reading, and recording techniques. The data collection process consists of several stages: (1) downloading the court decision from the official Directory of Decisions of the Supreme Court of the Republic of Indonesia; (2) reading the entire decision to understand the context of the case, chronology, and position of the statement in the case; (3) identifying and marking the defendant's statement that is the object of the court's consideration; (4) recording the statement and its context, including the speaker, speaking partner, time, place, and speech situation as long as it is available in the decision; and (5) classifying the data based on the form of reference and the function of the speech act.

Data were analyzed through several stages. First, data reduction was carried out by selecting statements that were relevant to the purpose of the study. Second, each speech was analyzed based on its form of reference by identifying the entity or party referred to by the linguistic expression in speech, referring to the reference concept of Lyons (1977). Third, speech was analyzed based on the function of speech using the classification of Searle (1979), which consisted of assertive, directive, expressive, commissive, and declarative speech acts. Fourth, the findings were interpreted to explain the relationship between the form of reference and the function of speech in the statement involved in this blasphemy case.

The results of the analysis were then used to explain how the selection of the form of reference and the function of speech were constructed in the legal context, as well as how it was related to the assessment of the statement in the court decision. Therefore, this study describes the linguistic form and function of utterances that a court adjudicated as blasphemy. It does not assess whether the verdict was legally correct or whether the utterances should be legally classified as blasphemy.

3. Result

The data analyzed in this study was taken from the Sanana District Court Decision No. 20/Pid.B/2020/PN Snn, a decision that has permanent legal force (inkrah) issued by the Sanana District Court, North Maluku, Indonesia. The defendant, Soleman Lawalata alias Eman alias Saparua, a 54-year-old farmer, was charged under Article 156a letter a juncto Article 64 paragraph (1) of the Criminal Code (KUHP) which regulates blasphemy as a continuing act.

The chronology of the case includes three separate events between December 2019 and January 2020 in Falabisahaya Village, North Mangoli District, Sula Islands Regency. On December 15, 2019, the defendant made a number of statements questioning the credibility of the Prophet Muhammad and the contents of the Qur'an while drinking coffee with witnesses Hasan Hanafi and Sapri Ahmad. On December 21, 2019, the defendant repeated a similar claim in front of witness Jalil Umasugi at a public resting place. On January 12, 2020, the defendant again made derogatory statements about the Prophet Muhammad, the Qur'an, and Islamic scholars in front of witnesses Idrus Mangkulo and Irma Bailawi at the construction site. These three incidents were charged as one continuous act based on Article 64 paragraph (1) of the Criminal Code.

During the trial, the prosecutor presented five factual witnesses and two expert witnesses, one of whom was certified in Forensic Linguistic Technical Guidance which stated that the statements met the elements of blasphemy based on the doctrinal context of scripture, while the second expert witness, a psychologist, stated that the defendant was mentally competent at the time the statement was made. The defendant denied that his statements constituted blasphemy and referred to them as his personal beliefs after returning to Christianity in October 2019, without denying the content of the statement itself. On August 3, 2020, the panel of judges found the defendant guilty and sentenced him to one year in prison.

Forms of Reference in Speech That Are Considered Blasphemy

Table 1 presents the distribution of the reference forms identified in the six statements examined in Decision No. 20/Pid.B/2020/PN Snn.

Table 1. Distribution of Reference Forms in Data

No	Reference Category	Realization	Frequency	Data
1	Direct personal reference	Nabi Muhammad SAW	2	D1, D5
2	Indirect/metonymic personal reference	Arab	1	D2
3		Al-Qur'an	2	D3, D4
4	Sacred text reference Religious community/group reference	Ulama	1	D6

As shown in Table 1, references to the Prophet Muhammad appeared the most (3 out of 6 data, combining direct and indirect realization), followed by the holy text of the Qur'an (2 data), and one data targeting religious communities (ulama). This distribution shows that the defendant's statements centered on the two main objects of Islamic belief, namely the Prophet and his holy book, before extending to social groups associated with religious authority.

Direct References to the Prophet Muhammad

In Datum 1, the reference of the Prophet Muhammad PBUH is explicitly and directly subject to negative predication:

> *"Why do you Muslims believe in the Prophet Muhammad when the Prophet Muhammad is a liar and just a myth" (D1)*

Datum 5 shows the same direct reference, this time as the target of verbal actions reported by the speaker himself, rather than a propositional claim:

> *"When I was a Muslim, I prayed prostrating myself to the Prophet Muhammad (PBUH)" (D5)*

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In both of these data, the referent can be identified without the need for context outside the sentence itself, or in Lyons (1977) terms, as a fully explicit reference expression.

Indirect Reference through Metonymic Shifts

Datum 2 shows a different pattern: the referent is not referred to directly, but rather is invoked through the metonymic expression "Arab", which can only be identified from the co-text of an earlier conversation discussing the Prophet Muhammad:

> *"Arabs are parlente/liars" ["Orang Arab itu perlente"] (D2)*

The utterance contains two referential cues: the ethnonym *orang Arab* and the demonstrative *itu*. Read in isolation, the noun phrase denotes an ethnic group, and the utterance could be taken as a generic stereotype about Arabs. The co-text supports a more specific reading for three reasons. First, D2 follows D1 [in the same conversation of 15 December 2019], in which the Prophet is named and predicated as a liar and a myth, so the topic of the exchange has already been fixed. Second, the predicate in D2 (*pembohong*) echoes the deceitfulness attributed to the Prophet in D1, which suggests continuity of the evaluated referent rather than a change of topic. Third, *itu* functions as an anaphoric pointer to a referent already established in the discourse (cf. Lyons, 1977, on deixis and anaphora). On this reading, *orang Arab* is a metonymic displacement, more precisely a *totum pro parte* relation, in which an ethnic collective stands for one of its members, the one made salient by the preceding talk.

This identification is an inference from co-text, not a property of the expression itself. Two alternatives cannot be excluded on linguistic grounds alone: D2 may target Arabs as an ethnic group, with the Prophet implicated only through shared ethnicity, or it may target both at once. How the decision treats D2, e.g., whether witness testimony, expert opinion, or the panels reasoning interprets *orang Arab* as referring to the Prophet. The analysis therefore treats the Prophet-directed reading as the most plausible one, while recognizing that D2 is the datum in this set whose referent depends most heavily on co-text.

Direct References to Sacred Texts

Datum 3 and 4 both mention the Qur'an directly before attaching certain claims about its contents:

> *"The Qur'an descended in the land of Arabia if it is used in Indonesian means the church is full because 30% (thirty) percent of the commands are to the church" (D3)*

> *"I have read the Qur'an, in which five percent talk about the Prophet Muhammad PBUH and the rest talk about Jesus" (D4)*

In both of these data, the Qur'an as a reference is again referred to anaphorically ("in it") as the fixed subject of comparative or quantitative claims.

References to Religious Communities

Datum 6 extends the target beyond individual figures or texts to social groups:

"The scholars who argue have all converted to Christianity" (D6)

The "scholars" reference is narrowed by the relative clause "who argues", then generalized through the quantor "all", resulting in a totalizing claim about the religious identity of the entire group. This is the only data on this set with collective referents, not individuals or texts.

The Function of Speech in Speech That Is Considered as Blasphemy

Analysis of the strength of illocution on six data shows uniformity: all speech is realized as an act of assertive speech (Searle, 1979). A more detailed reading shows that this assertive function is realized through four different sub-strategies, as summarized in Table 2.

Table 2. Assertive Realization Sub-Strategy

No	Sub-Strategy	Data	Reference Target
1	Direct evaluative predictions	D1, D2	Nabi Muhammad
2	Quasi-factual/statistical legitimacy	D3, D4	The Qur'an
3	First-person narrative statement	D5	Nabi Muhammad
4	Collective generalization	D6	Para Ulama'

Direct Evaluative Predictions

Datum 1 and 2 embody the assertive function through the simplest strategy, which is to name the referent and attach the evaluative predicate without mitigation. Structurally, they both follow the same illocution scheme: [referen] + [copula] + [degrading predicate]. The difference between D1 and D2 lies in the referential strategy used (direct naming versus metonymic shift), not in the strength of the statement.

Quasi-Factual/Statistical Legitimacy

Datum 3 and 4 embody the assertive function by embedding the evaluation into a pseudo-quantitative framework. Both of these data use numerical precision ("30 percent", "five percent") as a rhetorical device that gives the impression of factual authority to propositionally unfounded claims.

First-Person Narrative Statement

Datum 5 embodies the assertive function through a different structure: instead of present evaluative claims, the defendant recounts first-person actions in the past. The "when I was a Muslim" clause serves as a marker of the insider's epistemic authority, positioning the defendant as a party with direct knowledge of the religion he now demeans to be.

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Collective Generalization

Datum 6 expands the assertive function of the evaluation of the individual into a generalization about a social group. The universal quantor of "everything" turns claims about a particular individual into a totalizing proposition of the entire category of religious authority figures.

The Relationship between Reference Forms and Assertive Sub-Strategies

Table 3 presents a cross-tabulation between the categories of referents, their ontological types, and the assertive sub-strategies used.

Table 3. Cross-Tabulation of Referent Categories and Assertive Sub-Categories

Data	Category Reference	Ontological Type	Assertive Sub-Strategy
D1	Prophet Muhammad (direct)	People/Agents	Direct evaluative predictions
D2	Prophet Muhammad (indirect)	People/Agents	Direct evaluative predictions
D3	Prophet Muhammad (indirect)	People/Agents	First-person narrative statement
D4	The Qur'an	Text/Artifacts	Quasi-factual/statistical legitimacy
D5	The Qur'an	Text/Artifacts	Quasi-factual/statistical legitimacy
D6	Ulama	Collective/social	Collective generalization

This cross-tabulation shows three patterns: (1) person-type referents (D1, D2, D5) are realized through character-based evaluative predictions; (2) text-type referents (D3, D4) are realized through quasi-statistical legitimacy; and (3) collective referents (D6) are realized through total generalization. None of the three data targeting the Prophet Muhammad as a person uses statistical framing, while both data targeting the Qur'an consistently use percentage fabrication, and the only data with a collective reference is the only one that is realized through universal quantification.

4.Discussion

Meaning of Assertive Function Homogeneity

The homogeneity of the assertive function in the six data is not just a limitation of the data, but a meaningful finding. According to Searle's felicity condition, an assertive statement binds the speaker to the truth of the proposition expressed (the essential condition) and presupposes the speaker's belief in the proposition (the condition of sincerity). This is important in a forensic context: from a speech-act perspective, the utterances the court treated as blasphemous in this case were all truth-apt claims about sacred referents, not expressions of attitude or requests for action.

Whether assertive force is a necessary feature of utterances that qualify as blasphemy under Article 156a of the Criminal Code is a question of legal interpretation that this linguistic analysis cannot settle. The finding is offered as a descriptive observation about one decision and as a hypothesis for corpus-based testing. Therefore, these findings reinforce and expand that the act of assertive speech is the main means of constructing conflicting texts in cases of insult and defamation, now to the realm of blasphemy specifically (Chernyshova, 2019).

Sub-Strategy Variations and Comparisons with Previous Studies

Although uniform at the functional level, the four assertive sub-strategies identified showed important variations when compared to the findings of previous research. The studies of Carney (2014), Fadhilah and Arimi (2024), and Taha et al. (2024) generally found that speakers in cases of religious defamation tended to reduce face-threatening claims through indirect speech and subtle innuendo. On the other hand, the data in this study, especially the quasi-factual legitimacy in Datum 3 and 4, instead used fabricated statistics not to soften claims, but to build credibility for the most face-threatening claims. Similarly, the first-person narrative strategy in Datum 5 parallels the self-image management strategy described by Oyeleye et al. (2024) in criminal speech, although it operates in reverse: instead of protecting the speaker's image, the claimed past religious identity is instead used to reinforce the legitimacy of the insult conveyed.

This difference in pattern also appears to be related to the discourse setting: unlike the public social media data in previous studies, the data in this study comes from private face-to-face conversations between the defendant and his interlocutor in a domestic setting, which appears to be associated with the absence of facial protection strategies in all six data.

Structural Relationship between Reference Form and Speech Function

The pattern in Table 3 shows that the ontological category of referents seems to condition the choice of assertive sub-strategies used to degrade them. The person-type referent (Prophet Muhammad) is discursively available for character and behavioral judgment, but cannot naturally accept claims formulated as measurable proportions, so they are realized through character-based predication. Text-type referents (the Qur'an), as textual artifacts with internal content, are discursively treated as something that can be "measured" or "quantified", so that they are realized through quasi-statistical legitimacy even though their quantification is completely contrived. The collective referent (the scholars) is open to claims about its entire membership, a rhetorical movement that is not available to a single referent, so it is realized through total generalization. This three-way pattern attracts character predictions, texts draw quasi-statistical legitimacy, and collectively draw total generalizations suggesting that the form of reference and the function of speech are not stand-alone dimensions, but are structurally interrelated.

These findings do not revise Lyons' (1977) reference theory or Searle's (1979) speech act theory. They show instead that the two can be applied to the same utterances in a single analysis, and that doing so reveals an association that analyzing them separately would not show. In this respect the study differs from earlier work that treated

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referent forms (Nasution et al., 2026; Adelawati & Arimi, 2025a; Akastangga et al., 2024) and speech functions (Budiman et al., 2026; Syahid et al., 2022) as separate objects of analysis. Because the evidence comes from six utterances by one speaker, the association is best read as a pattern observed in this case and as a hypothesis for further testing.

Practical and Forensic Implications

This structural linkage is also directly related to the practical and forensic functions of this analysis. In blasphemy law in Indonesia, Article 156a requires, among other elements, that the act be committed deliberately and in public. Whether these elements are met is a legal determination for the court. Linguistic analysis can inform that determination only indirectly, by describing how an utterance is built (what it refers to and what it does) and which readings its form supports. It does not itself establish legal intent, which also depends on evidence beyond language.

The correspondence between the referent and the strategies identified in this study offers a replicable diagnostic for linguists: when the court is confronted with ambiguous or partially indirect statements, such as the metonymic "Arab" in Datum 2, identifying the ontological type of referent discussed in the surrounding co-text can help reconstruct which assertive sub-strategy, and thus what specific derogatory claims, the speaker is most likely to intend. Thus, this approach favors a more systematic reconstruction of communicative intent rather than relying solely on the surface form of the expression.

5. Conclusion

The findings of this study show that the defendant's statements target three categories of referents of religious figures (the Prophet Muhammad), sacred texts (the Qur'an), and religious communities (ulama) that are realized through direct naming and, in one case, metonymic shifts. At the level of speech function acts, all six statements are realized as assertive speech acts, which are realized through four sub-strategies of direct evaluative predication, quasi-factual legitimacy, first-person narratives, and collective generalizations, each of which is systematically aligned with the targeted ontological type of referent.

The study's main contribution is to bring reference analysis and speech-act analysis together in a single case and to report an association between them. In this decision, utterances about the Prophet were not quantified, utterances about the Qur'an used fabricated numerical proportions, and the utterance about a religious community used universal quantification. This association is offered as a hypothesis for testing, not as a rule. In practical terms, it suggests that, when an utterance is indirectly phrased, attention to the type of referent in the surrounding co-text may help linguists describe what kind of derogatory claim is being made. Establishing legal intent remains a matter for the court.

This study is limited by its reliance on a single court ruling involving a single defendant, so the identified pattern of referen–strategy correspondence needs to be read as a pattern observed in this case, rather than a generalization of the entire blasphemy discourse in Indonesia. Further research suggests extending this integrative framework to a multi-verdict corpus to test the consistency of these patterns across defendants, religious contexts, and modes of discourse (court testimony, social media, and broadcast media).

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