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THE APPLICATION OF THE DOCTRINE OF INCLUSION (DEELNEMING) AND THE FORM OF ERROR IN PLACING BUZZER SERVICE TENANTS AS INTELLECTUAL ACTORS IN THE CRIMINAL ACT OF MANIPULATION OF PUBLIC OPINION

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Abstract

Advancements in information technology have given rise to the practice of using "buzzers" to shape and manipulate public opinion on social media. In current law enforcement practice, criminal liability is generally imposed only on the buzzer as the direct perpetrator, whereas the party hiring the buzzer who orders and controls the activity lacks clear regulatory treatment. This study aims to analyze the legal basis for applying the doctrine of complicity (deelneming) and the requisite form of culpability to hold the party hiring the buzzer liable as an intellectual perpetrator under Indonesian criminal law. The study employs a normative legal research method, utilizing both statutory and conceptual approaches. The legal materials examined include the Criminal Code (KUHP), Law Number 1 of 2023 concerning the Criminal Code, and Law Number 1 of 2024 concerning the Second Amendment to the Law on Electronic Information and Transactions. The findings indicate that the party hiring a buzzer can be held criminally liable as an intellectual perpetrator if the elements of the doctrine of complicity are met and the party possesses the requisite form of culpability specifically intent (opzet) in planning, ordering, or controlling the manipulation of public opinion. This study offers a legal framework regarding the criminal liability of those who hire buzzers, aiming to foster legal certainty in law enforcement within the digital sphere.

INTRODUCTION

The development of information and communication technology has transformed the way people obtain, process, and disseminate information through social media. The emergence of various digital platforms, such as X, Instagram, Facebook, TikTok, and

YouTube, has turned social media into an influential public sphere that shapes public perceptions, attitudes, and opinions. While these developments have facilitated the exchange of information, they have also created opportunities for the misuse of digital media for particular interests through the systematic and massive dissemination of information. One form of such misuse is the employment of buzzer services to shape or manipulate public opinion (Faulina, 2020).

The use of buzzer services has expanded rapidly alongside the increasing intensity of political, economic, and business activities in the digital sphere. This practice is no longer limited to promoting products or services but has increasingly been used to spread disinformation, propaganda, hate speech, and narratives intended to influence public perceptions of particular issues. Buzzer activities are generally carried out in an organized manner through the coordination of multiple accounts that receive instructions, content, and financial compensation from specific parties. This condition indicates that public opinion manipulation involves not only the individuals who disseminate the content but also those who design, direct, and finance the entire operation (Arianto, 2020).

Indonesian criminal law recognizes the doctrine of complicity (*deelneming*) as the basis for determining the criminal liability of every individual involved in a criminal offense. The provisions on complicity, as stipulated in Articles 55 and 56 of the Indonesian Criminal Code, establish that criminal liability is imposed not only on the direct perpetrator but also on those who order, participate in, instigate, or assist in the commission of a criminal offense. Furthermore, the imposition of criminal liability must be based on the existence of culpability (*schuld*), in the form of intent (*opzet*) or negligence (*culpa*), as a manifestation of the principle of *geen straf zonder schuld* (no punishment without fault).

The regulation of criminal offenses committed through electronic media has been accommodated under Law Number 1 of 2024 concerning the Second Amendment to Law Number 11 of 2008 on Electronic Information and Transactions. However, the legislation does not specifically regulate the legal position of individuals who hire buzzer services as the parties directing or controlling public opinion manipulation. In practice, law enforcement has primarily focused on the accounts that disseminate the information, while those who initiate, organize, and finance buzzer operations have not yet been subject to a clear framework of criminal liability. This situation creates legal uncertainty in determining the appropriate subjects to be held criminally responsible. Previous studies on buzzers have generally concentrated on political communication, the influence of social media on public opinion formation, or the criminal liability of buzzers as direct perpetrators. Studies examining the liability of individuals who hire buzzer services as intellectual actors through the application of the doctrine of complicity (*deelneming*) and the theory of culpability remain very limited. This research gap demonstrates the need for a more comprehensive analysis of the legal basis for imposing criminal liability on parties who initiate, control, and finance public opinion manipulation activities.

This study aims to analyze the juridical basis for applying the doctrine of complicity (*deelneming*) and the forms of culpability in positioning individuals who hire buzzer services as intellectual actors in the criminal offense of public opinion manipulation under Indonesian criminal law. The findings are expected to contribute to the development of criminal law in the digital era and serve as a reference for law enforcement authorities in constructing criminal liability for the intellectual actors behind public opinion manipulation through social media.

LITERATURE REVIEW

The Doctrine of Participation (Deelneming) in Indonesian Criminal Law

The doctrine of participation (*deelneming*) is one of the fundamental concepts in criminal law governing criminal liability involving more than one person in the commission of a criminal offense. In principle, a criminal act is not always committed by a single individual but may involve multiple persons performing different roles in realizing the offense. Accordingly, criminal law extends criminal liability not only to the principal offender who directly commits the offense but also to those who order, jointly participate in, instigate, or assist the commission of the crime. This concept is recognized in criminal law doctrine as *deelneming* or participation (Chazawi, 2019).

The term *deelneming* originates from the Dutch language and literally means "participation" in the commission of a criminal offense. Moeljatno (2015) defines participation as a circumstance in which a criminal offense is committed by more than one person, each having a connection with the realization of the offense. Such a connection does not necessarily require direct execution of every element of the crime but may take the form of giving orders, cooperating, providing assistance, or exerting influence that enables the offense to occur. Consequently, an individual may still incur criminal liability even without personally carrying out every prohibited act prescribed by law (Moeljatno, 2015).

The legal basis for participation in Indonesian criminal law is provided under Articles 55 and 56 of the Indonesian Criminal Code (*Kitab Undang-Undang Hukum Pidana*—KUHP), the substance of which has been retained in Law Number 1 of 2023 concerning the Criminal Code. Article 55 of the KUHP regulates persons regarded as perpetrators (*dader*), including the direct perpetrator (*pleger*), the person who orders another to commit the offense (*doen pleger*), the co-perpetrator (*medepleger*), and the person who intentionally persuades another to commit a criminal act (*uitlokker*). Meanwhile, Article 56 governs accomplices (*medeplichtigheid*), namely individuals who intentionally provide assistance before or during the commission of a criminal offense. These provisions demonstrate that Indonesian criminal law adopts a system of criminal liability that extends beyond direct perpetrators to encompass all parties contributing to the commission of a criminal offense.

According to Chazawi (2019), the doctrine of participation constitutes an extension of criminal liability based on the close relationship between the conduct of each participant and the resulting criminal offense. Each participant performs a distinct role, resulting in different legal grounds for criminal liability. The principal offender is responsible for all elements of the offense, whereas those who order, instigate, or assist are held liable according to the nature and extent of their involvement. Therefore, identifying the specific form of participation is essential because it directly affects both the proof of criminal elements and the criminal liability attributable to each participant.

A similar view is expressed by Hamzah (2017), who argues that the doctrine of participation was developed to address increasingly complex forms of collective criminality. He explains that modern crimes frequently involve intellectual actors who do not personally perform the prohibited acts but instead utilize others as executors. Under such circumstances, criminal law must be capable of reaching those who control or direct criminal conduct in order to achieve the objectives of punishment and uphold justice. This perspective is particularly relevant to contemporary cybercrime, including the employment of buzzer services to manipulate public opinion through social media.

The application of the doctrine of participation is especially significant in cases involving the manipulation of public opinion, as such activities are generally organized and involve multiple individuals. The dissemination of content on social media is often not initiated independently by buzzers acting as field operators but is instead directed by parties who formulate strategies, develop narratives, issue instructions, provide financial support, and supervise the entire digital campaign. Under these circumstances, individuals who hire buzzer services cannot automatically be regarded as external to the criminal offense. If their conduct satisfies the elements of participation under Articles 55 and 56 of the KUHP, a legal basis exists for holding them criminally liable. Accordingly, analyzing the form of participation is essential to determine whether the hirer of buzzer services qualifies as an intellectual perpetrator, particularly as a *doen pleger* or *uitlokker*, whose liability can subsequently be assessed under the doctrine of culpability (*schuld*) as the basis of criminal responsibility.

The Theory of Culpability (*Schuld*) as the Basis of Criminal Liability

Criminal liability in Indonesian criminal law is not established solely by the fulfillment of the statutory elements of a criminal offense but also requires the existence of culpability (*schuld*) on the part of the offender. This principle is embodied in the maxim *geen straf zonder schuld*, meaning “no punishment without culpability.” It is one of the fundamental principles of modern criminal law, emphasizing that a person cannot be punished merely for committing a prohibited act; rather, there must be proof of a psychological connection between the offender and the act committed. Consequently, culpability serves as both the moral and legal foundation for imposing criminal sanctions (Moeljatno, 2015).

Moeljatno (2015) explains that culpability refers to the psychological condition of the offender, demonstrating a relationship between the offender’s intent and the criminal act, thereby justifying criminal responsibility. According to him, the mere commission of a criminal act is insufficient to impose punishment unless the offender possesses criminal capacity, has a mental connection with the act committed, and is not protected by any excuse that eliminates culpability. Therefore, culpability distinguishes an individual who merely commits an act from one who can legally be held criminally responsible.

In criminal law doctrine, culpability is generally classified into two forms: intent (*opzet*) and negligence (*culpa*). Intent represents the more serious form of culpability because the offender knowingly and willingly desires the consequences of the act. In contrast, negligence arises from carelessness, lack of caution, or failure to foresee consequences that should reasonably have been anticipated. Hamzah (2017) identifies three forms of intent: intent as purpose (*opzet als oogmerk*), intent with certainty (*opzet bij zekerheidsbewustzijn*), and conditional intent (*dolus eventualis*). Although these forms reflect different degrees of intention, each may constitute a basis for criminal liability provided that the element of intent can be established.

Chazawi (2019) argues that the existence of culpability must be established through an examination of the offender’s entire course of conduct before, during, and after the commission of the offense. Culpability should not be assessed solely from the resulting harm but also from the offender’s intention, objectives, motives, and awareness in carrying out the criminal act. This approach is particularly important in organized modern crimes, where the individual controlling the offense often does not personally commit the prohibited conduct. Accordingly, proving the culpability of an intellectual perpetrator primarily focuses on demonstrating the active role played in planning, directing, and controlling the commission of the offense.

The theory of culpability is highly relevant in assessing the criminal liability of individuals who hire buzzer services. In most cases, such individuals do not personally disseminate information or narratives on social media but instead determine campaign objectives, formulate communication strategies, issue instructions, provide financial resources, and supervise the activities of buzzers. If it can be established that the hirer knowingly intended the dissemination of information aimed at manipulating public opinion, the required element of intent (*opzet*) is satisfied. Conversely, where the dissemination occurs beyond the hirer's intention or instructions, culpability must be examined more comprehensively based on the available facts and admissible evidence. Accordingly, the existence of a psychological connection between the hirer and the criminal offense constitutes the determining factor in establishing criminal liability (Pranaja & Narwastuty, 2026).

The rapid development of information technology has transformed criminal offenses from conventional acts into crimes committed through electronic systems and digital networks. The phenomenon of buzzer services demonstrates that criminal acts may be carried out through structured divisions of roles, meaning that field operators are not always the parties bearing the greatest criminal responsibility. Research conducted by Pranaja and Narwastuty (2026) indicates that organized buzzer operations intended to influence public opinion frequently involve behind-the-scenes actors responsible for developing strategies and providing financial support. Although their study primarily focuses on the criminal liability of buzzers as direct perpetrators, its findings highlight the importance of extending legal analysis to individuals who instruct or control buzzer activities through the application of the doctrine of participation (*deelneming*) and the theory of culpability (*schuld*). Therefore, establishing the element of intent on the part of those who hire buzzer services constitutes one of the principal legal grounds for recognizing them as intellectual perpetrators in the criminal offense of manipulating public opinion.

The Concept of the Intellectual Perpetrator (*Intellectual Dader*) in Criminal Law and Its Relevance to the Hirer of Buzzer Services

The development of modern crime demonstrates that offenders do not always personally commit the acts prohibited by law. In many cases, certain individuals design, direct, instruct, and finance criminal activities, while the actual execution is carried out by others. In criminal law doctrine, such individuals are referred to as intellectual perpetrators (*intellectual dader*). Although this term is not expressly regulated in the Indonesian Criminal Code (*Kitab Undang-Undang Hukum Pidana*—KUHP), its existence is recognized through the doctrine of participation (*deelneming*), particularly in the forms of ordering another to commit an offense (*doen pleger*) and instigation (*uitlokker*) (Chazawi, 2019). Accordingly, determining whether a person qualifies as an intellectual perpetrator depends not on their physical presence at the crime scene but on the degree of influence and control they exercise over the commission of the offense.

Lamintang (2013) defines an intellectual perpetrator as a person who controls the commission of a criminal offense through his or her intention and influence over other perpetrators. Such control may take the form of giving orders, providing direction, supplying facilities, or designing the criminal plan. Consequently, an individual may be regarded as the principal offender even without personally carrying out all elements of the offense, provided that the crime occurred as a result of that person's intent and control. This perspective indicates that criminal law places greater emphasis on an individual's actual role in realizing a criminal offense than on who physically commits the prohibited act.

The concept of the intellectual perpetrator is closely related to the doctrines of *doen pleger* and *uitlokker* under Article 55 paragraph (1) of the KUHP. A *doen pleger* exists when a person orders another individual to commit a criminal offense while the person carrying out the act cannot be held criminally liable due to certain circumstances, such as lacking criminal capacity or merely functioning as an instrument. Meanwhile, an *uitlokker* is a person who intentionally induces another to commit a criminal offense through promises, rewards, authority, threats, abuse of power, or other means recognized by law (Hamzah, 2017). In practice, the concept of *uitlokking* is more frequently applied to explain the involvement of intellectual actors who influence the principal offender's decision to commit a crime.

The increasing complexity of cybercrime has made the concept of the intellectual perpetrator even more relevant, as many offenses are committed through systematic divisions of labor. Individuals operating behind the scenes frequently function as strategists, network coordinators, and financiers, while field operators merely execute predetermined instructions. These characteristics are likewise evident in the use of buzzer services to shape or manipulate public opinion through social media. The hirer of buzzer services commonly determines campaign objectives, develops narratives, identifies target audiences, schedules content dissemination, and provides financial compensation to buzzers. Consequently, the hirer's role extends beyond administrative coordination and may constitute the primary factor leading to the commission of a criminal offense when the campaign's content or objectives violate criminal law (Bassang, 2015).

Arianto (2020) explains that the function of buzzers in Indonesia has shifted from a marketing tool to an organized instrument for shaping public opinion. This practice demonstrates the existence of a coordinated relationship between those who issue instructions and those who disseminate narratives through social media. Likewise, Pranaja and Narwastuty (2026) observe that criminal liability has largely been imposed on buzzers acting as field operators, while individuals who hire and direct such activities have received insufficient attention within the framework of Indonesian criminal law. These findings indicate a significant gap in legal scholarship concerning the juridical basis for holding the hirer of buzzer services criminally liable as an intellectual perpetrator.

Under the doctrine of participation and the theory of criminal liability, the hirer of buzzer services may be classified as an intellectual perpetrator if several legal elements are satisfied. First, there must be an intention to commit a criminal offense through the use of buzzer services. Second, there must be active conduct in the form of issuing instructions, providing financial support, formulating strategies, or directing the implementation of the digital campaign. Third, a causal relationship must exist between the hirer's conduct and the manipulation of public opinion. Finally, the hirer must possess the requisite element of intent (*opzet*), which must be established through legally admissible evidence. When all these elements are fulfilled, there is a sufficient juridical basis for classifying the hirer of buzzer services as an intellectual perpetrator under the doctrine of *deelneming*, even though the actual dissemination of content is carried out by other parties. This analysis demonstrates that criminal liability in digital crimes should not be limited to field operators but should also extend to those who serve as the principal driving force behind the commission of the offense in order to promote legal certainty, justice, and the effective enforcement of criminal law in cyberspace.

RESEARCH METHOD

This study employed a normative legal research method, focusing on the analysis of legal norms governing criminal liability for parties hiring buzzer services in cases involving the manipulation of public opinion. The research adopted statutory and conceptual approaches. The statutory approach examined the relevant legal framework, including the Indonesian Criminal Code (*Kitab Undang-Undang Hukum Pidana*—KUHP), Law Number 1 of 2023 concerning the Criminal Code, and Law Number 1 of 2024 concerning the Second Amendment to Law Number 11 of 2008 on Electronic Information and Transactions. The conceptual approach was used to analyze the doctrines of participation (*deelneming*), intellectual perpetrator (*intellectual dader*), and culpability (*schuld*) as the legal basis for criminal responsibility.

The study relied on secondary legal materials, consisting of statutory regulations, legal literature, scholarly journals, and other relevant academic sources. These materials were analyzed using qualitative juridical analysis through legal interpretation and doctrinal reasoning to examine the applicability of the doctrine of participation and the theory of culpability in establishing the criminal liability of parties hiring buzzer services as intellectual perpetrators in the manipulation of public opinion within the digital environment.

RESULTS AND DISCUSSION

The Juridical Basis for Applying the Doctrine of Participation (*Deelneming*) in Classifying the Hirer of Buzzer Services as an Intellectual Perpetrator in the Criminal Offense of Public Opinion Manipulation

The rapid development of information technology has transformed the nature of criminal offenses from conventional crimes into offenses that primarily utilize digital platforms as their means of commission. Social media enables individuals to disseminate information to the public rapidly and on a massive scale. However, these platforms are not always used for legitimate purposes; they have also become instruments for disseminating manipulative information through the use of buzzer services. This phenomenon demonstrates the involvement of multiple parties, including those who formulate strategies, provide funding, issue instructions, and those who execute the dissemination of information through social media accounts. Such interactions raise questions concerning the allocation of criminal liability to individuals operating behind the dissemination process, particularly the hirer of buzzer services, who is presumed to play a dominant role in orchestrating the manipulation of public opinion (Arianto, 2020).

The doctrine of participation (*deelneming*) constitutes one of the fundamental principles of criminal law, extending criminal liability to every individual who contributes to the commission of a criminal offense. The legal framework governing participation is contained in Articles 55 and 56 of the Indonesian Criminal Code (*Kitab Undang-Undang Hukum Pidana*—KUHP), the substance of which has been retained under Law Number 1 of 2023 concerning the Criminal Code. These provisions classify criminal actors into several categories, namely the principal perpetrator (*pleger*), the person who orders another to commit the offense (*doen pleger*), the co-perpetrator (*medepleger*), the instigator (*uitlokker*), and the accomplice (*medeplichtige*). This classification demonstrates that Indonesian criminal law is not confined to individuals who physically commit criminal acts but also extends liability to those who play a significant role in bringing about the commission of an offense.

The doctrine of participation further indicates that Articles 55 and 56 of the KUHP represent an expansion of criminal liability. Bassang (2015) explains that the doctrine was developed to ensure that every individual involved in the realization of a criminal offense may be held criminally responsible according to the nature of their participation. These forms of participation include direct perpetrators, those who order others to commit offenses, co-perpetrators, instigators, and accomplices. Such categorization reflects the principle that criminal liability is determined by an individual's contribution to the commission of the offense rather than merely by identifying the person who performs the final physical act.

This perspective is reinforced by the study of Pratiwi (2022), which emphasizes that the doctrine of participation extends beyond physical involvement to encompass psychological participation, including an individual's intent, influence, and role in facilitating the commission of a criminal offense. The study explains that participation consists of perpetrators—including *pleger*, *doen pleger*, *medepleger*, and *uitlokker*—as well as accomplices (*medeplichtige*). This classification serves as the legal basis for determining criminal liability according to the quality and degree of each participant's involvement.

The practice of employing buzzer services demonstrates a clear division of responsibilities between the hirer and the individuals responsible for disseminating information. Typically, the hirer determines the objectives of the campaign, formulates the narratives to be published, identifies the target audience, schedules the timing of publication, and provides financial compensation to the executors. The buzzers then carry out these instructions through multiple social media accounts to maximize the dissemination of information. These characteristics indicate that the dissemination process is not an isolated individual act but rather an organized activity involving a structured allocation of functions. This phenomenon has likewise been identified by Arianto (2020), who argues that the role of buzzers in Indonesia has shifted from serving as a digital marketing instrument to functioning as a mechanism for shaping public opinion within the digital sphere.

The legal assessment of the hirer of buzzer services cannot be based solely on the fact that payment is made to the executors. Instead, the analysis must focus on the relationship between the hirer's intention and the criminal offense committed by the buzzers. The hirer may be regarded as a participant if it can be established that they formulated the operational plan, directed the implementation of the campaign, determined the content to be disseminated, and intended the unlawful consequences prohibited by criminal law. This analysis is consistent with the principle of culpability (*geen straf zonder schuld*), which requires a demonstrable connection between the offender's conduct and culpability before criminal liability may be imposed.

The concept of the intellectual perpetrator (*intellectual dader*) is not expressly regulated under the KUHP. Nevertheless, criminal law doctrine employs this concept to describe an individual who exercises control over the commission of a criminal offense through planning, direction, or authority over other participants. This doctrinal concept provides a legal basis for considering the hirer of buzzer services as an intellectual perpetrator, provided that evidence presented during judicial proceedings establishes that the hirer exercised dominant control and intention throughout the commission of the offense. Such a determination must nevertheless remain grounded in the legally recognized forms of participation under Article 55 of the KUHP. Accordingly, not every individual who hires buzzer services may automatically be classified as an intellectual perpetrator.

The foregoing analysis demonstrates that the doctrine of participation under Articles 55 and 56 of the KUHP is highly relevant to criminal offenses involving the manipulation of public opinion through coordinated buzzer networks. Criminal liability should not be confined to the individuals who directly disseminate unlawful content but should also extend to those who initiate, organize, and control the overall operation, provided that all elements of participation and culpability are established in accordance with Indonesian criminal law.

CONCLUSION

Based on the analysis, it can be concluded that the doctrine of participation (*deelneming*) provides a sufficient juridical basis for holding the party hiring buzzer services criminally liable as an intellectual perpetrator in the manipulation of public opinion, provided that the legal elements of participation under Articles 55 and 56 of the Indonesian Criminal Code are fulfilled. Criminal liability should not be limited to buzzers as direct perpetrators but may also extend to individuals who plan, direct, finance, or control the dissemination of unlawful content through coordinated digital campaigns. The determination of such liability must be based on the proven form of participation and cannot be imposed solely on the basis that a person hires buzzer services.

Furthermore, the criminal liability of the party hiring buzzer services must also satisfy the principle of culpability (*geen straf zonder schuld*). This requires proof that the hirer acted with the requisite intent (*opzet*) in planning, ordering, or controlling activities aimed at manipulating public opinion. Accordingly, the application of the doctrine of participation and the theory of culpability provides a coherent legal framework for identifying the hirer of buzzer services as an intellectual perpetrator. This framework contributes to strengthening legal certainty and enhancing the effectiveness of criminal law enforcement against organized digital crimes involving the manipulation of public opinion in Indonesia.

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