

Implementation of the Rights of Justice Collaborators to Get Reduced Sentences in the Crime of Murder

Dany Ardiansah Putra¹, Wahyu Prawesthi¹, Dedi Wardana Nasoetion¹

¹ Universitas Dr Soetomo, Indonesia

ARTICLE INFO

Keywords:

Justice Collaborator;
Sentence Reduction;
Murder;
Criminal Law;
Judicial Discretion;

Article history:

Received 2025-12-18
Revised 2026-01-19
Accepted 2026-02-20

ABSTRACT

The concept of a Justice Collaborator (JC) has become an important instrument in criminal law enforcement, particularly in uncovering complex crimes. A justice collaborator refers to a perpetrator who cooperates with law enforcement authorities by providing significant information to reveal a criminal act and identify other perpetrators. In Indonesia, the recognition of justice collaborators is regulated in Law Number 13 of 2006 as amended by Law Number 31 of 2014 concerning the Protection of Witnesses and Victims, as well as Supreme Court Circular Letter Number 4 of 2011. This study examines the implementation of the rights of justice collaborators to obtain sentence reduction in cases of murder and analyzes the legal considerations applied by judges in granting such leniency. This research employs a normative legal method using statutory and conceptual approaches. Primary legal materials consist of relevant laws and regulations, while secondary materials include legal doctrines and scholarly articles. The data are analyzed qualitatively through descriptive analysis. The results indicate that although justice collaborators are legally entitled to special protection and the possibility of sentence reduction, their implementation in murder cases is not automatic and depends heavily on judicial discretion. Judges consider several factors, including the significance of the information provided, the role of the offender in the crime, and the consistency of cooperation during the investigation and trial process. The study concludes that clearer legal standards and consistent judicial application are necessary to ensure legal certainty and fairness in granting sentence reductions to justice collaborators in murder cases.

This is an open access article under the [CC BY](https://creativecommons.org/licenses/by/4.0/) license.



Corresponding Author:

Dany Ardiansah Putra
Universitas Dr Soetomo, Indonesia; danyxena9318@gmail.com

1. INTRODUCTION

Criminal law is essentially a state instrument to protect the legal interests of the community through the mechanism of imposing sanctions on the perpetrators of criminal acts. In its development, the criminal law system is no longer only oriented towards retributive justice, but also on the effectiveness of law enforcement and crime control. This paradigm shift has given birth to various criminal policies that aim

to strengthen the state's ability to uncover and tackle crime, including through providing incentives to perpetrators who cooperate with law enforcement officials.

One form of this policy is the recognition of cooperating perpetrators, known as justice collaborators. The concept of justice collaborator basically provides space for perpetrators of criminal acts to obtain special treatment, including the possibility of a reduction in sentences, if the person concerned significantly assists law enforcement officials in uncovering criminal acts and other perpetrators. From the perspective of criminal law policy, this mechanism is an instrumental strategy to penetrate crimes that are difficult to uncover, especially those committed jointly or organized (Ali, 2015).

In Indonesia, the regulation regarding justice collaborators is contained in Law Number 13 of 2006 concerning the Protection of Witnesses and Victims as amended by Law Number 31 of 2014. These provisions provide legal protection and awards to witnesses of perpetrators who cooperate. In addition, the Supreme Court through the Supreme Court Circular Letter (SEMA) Number 4 of 2011 provides guidelines for judges in providing special treatment in the form of leniency to justice collaborators as long as they meet certain conditions, such as not being the main perpetrator and providing significant information.

Although normatively there has been recognition of justice collaborators, its implementation in criminal justice practice still raises various problems, especially in the crime of murder. The crime of murder is a serious crime that attacks the right to life as the most basic human right guaranteed in the constitution and human rights instruments. Therefore, the granting of reduced sentences to cooperating murder perpetrators often creates a dilemma between the interests of the effectiveness of law enforcement and a sense of justice for victims and the community.

From the perspective of criminal theory, there is a tension between the goal of retributive theory and the goal of utility (utilitarian theory). Retributive theory emphasizes that punishment is imposed as a commensurate retribution for the wrongdoing of the perpetrator, while utilitarian theory sees crime as a means to achieve broader social goals, such as crime prevention and control (Muladi & Arief, 2010). The granting of reduced sentences to justice collaborators in murder cases reflects more of a utilitarian approach, as it considers the benefits obtained from the cooperation of the perpetrators in uncovering crimes.

However, without clear and consistent criteria in its application, the justice collaborator policy has the potential to cause legal uncertainty. In practice, not all perpetrators who volunteer as justice collaborators receive a reduction in sentences, and there are variations in judges' considerations in deciding similar cases. This condition shows that there is a wide discretionary space, which if not regulated systematically can cause disparities in decisions.

The principle of legal certainty and equality before the law requires an objective and transparent standard in granting leniency. Marzuki (2020) emphasized that legal certainty can only be realized if norms are applied consistently and predictably. In the context of justice collaborators, clear parameters are needed regarding the extent to which the perpetrator's cooperation is considered significant and how the reduction of punishment is proportionately given.

Furthermore, the implementation of justice collaborators in the crime of murder must also consider the perspective of victim protection. The victim's right to justice and restoration should not be ignored just for the sake of the effectiveness of the disclosure of the case. Therefore, the policy of providing sentence reductions must pay attention to the balance between the interests of the perpetrator, the victim, and the wider community as part of a fair criminal justice system.

Based on this description, the problem of the implementation of the rights of cooperating perpetrators (justice collaborators) to obtain a reduction in sentences in the crime of murder is important to be studied in depth. This study aims not only to analyze the normative foundations and practices of their application, but also to assess the extent to which the policy has met the principles of justice, legal certainty, and usefulness in the Indonesian criminal law system.

Thus, this research is expected to make a theoretical contribution to the development of criminal law as well as practical recommendations for law enforcement officials and policymakers in formulating

clearer and more consistent standards regarding the granting of leniency to justice collaborators in murder cases.

2. METHODS

This research uses a type of normative legal research, which is research conducted by examining the applicable positive legal norms, legal principles, and legal doctrines related to the problem being researched. Normative legal research is oriented towards the analysis of laws and regulations, court decisions, and legal literature as the main source in answering the legal issues studied (Marzuki, 2020).

The approaches used in this study include the statute approach, the conceptual approach, and the case approach. The legislative approach is carried out by examining the legal provisions that regulate justice collaborators, especially Law Number 13 of 2006 as amended by Law Number 31 of 2014 concerning the Protection of Witnesses and Victims, Circular Letter of the Supreme Court Number 4 of 2011, as well as provisions in the Criminal Code (KUHP) which regulates the crime of murder. Through this approach, the researcher analyzes how the normative framework provides a basis for granting sentence reductions to cooperating perpetrators.

The conceptual approach is used to examine the concept of justice collaborator from the perspective of criminal theory and criminal policy. This approach involves the study of legal doctrine and the opinions of experts on the purpose of punishment, the balance between retributive and utilitarian justice, and the principles of legal certainty and justice (Muladi & Arief, 2010). With this approach, the research does not only stop at written norms, but also assesses the rationality and purpose of the policy.

The case approach is carried out by examining court decisions related to the granting of justice collaborator status in the crime of murder. The analysis of the judge's considerations was carried out to find out how the norms were implemented in judicial practice and the extent to which the judge used discretion in granting a reduction in sentences.

The legal materials used in this study consist of primary, secondary, and tertiary legal materials. Primary legal materials include relevant laws and regulations and court decisions. Secondary legal materials are in the form of criminal law books, scientific journals, and academic works that discuss justice collaborators and criminal theory. The tertiary legal materials are in the form of legal dictionaries and legal encyclopedias that support the understanding of legal terms and concepts.

The technique of collecting legal materials is carried out through library research, namely by tracing and reviewing legal documents, literature, and court decisions that are relevant to the research topic (Soekanto, 1986). All legal materials obtained are then classified and analyzed based on their relevance to the formulation of the problem.

The analysis of legal materials is carried out qualitatively using legal interpretation methods, including grammatical, systematic, and teleological interpretations. Grammatical interpretation is used to understand the meaning of the text in the laws and regulations. Systematic interpretation is carried out by connecting one norm with another norm in the criminal law system. Meanwhile, teleological interpretation is used to assess the purpose of establishing justice collaborator norms within the framework of crime prevention policies and the achievement of justice.

Through this research method, it is hoped that a comprehensive understanding of the implementation of the rights of cooperating perpetrators (justice collaborators) in obtaining a reduction in sentences for the crime of murder can be obtained, as well as a critical analysis of the consistency of its application in criminal justice practice in Indonesia.

3. FINDINGS AND DISCUSSION

A. Legal Regulation of Justice Collaborator in the Indonesian Legal System

The regulation of justice collaborators in the Indonesian legal system is part of a criminal law policy that aims to improve the effectiveness of law enforcement. Normatively, the recognition of justice collaborators is contained in Law Number 13 of 2006 concerning the Protection of Witnesses and

Victims as amended by Law Number 31 of 2014. In this provision, witnesses of perpetrators who cooperate are given legal protection and the possibility of receiving an award in the form of leniency.

In addition, the Supreme Court Circular Letter (SEMA) Number 4 of 2011 provides guidelines for judges in treating justice collaborators. In the SEMA, it is emphasized that perpetrators who cooperate can be given leniency as long as they are not the main perpetrators and provide significant information to uncover criminal acts committed together.

This arrangement shows a shift in the paradigm of criminal law from a purely retributive approach to a more utilitarian and instrumental approach. The state uses the cooperation of perpetrators as a means to uncover a wider range of criminal acts. Thus, sentence reduction is not merely a form of mercy, but part of a law enforcement strategy.

However, in the case of murder, this regulation does not explicitly provide a quantitative standard regarding the amount of sentence reduction. This opens up a wide enough discretion space for judges to determine the extent to which the perpetrator's cooperation deserves to be rewarded with criminal leniency.

The regulation of justice collaborators in the Indonesian legal system is part of the development of criminal law policies that aim to increase the effectiveness of law enforcement against criminal acts committed jointly or organically. This concept was born from the practical need of law enforcement officials to penetrate the complex structure of crime, where the information of one of the perpetrators is the key in revealing the main perpetrator or intellectual actor behind a criminal act.

Normatively, the recognition of justice collaborators in Indonesia is regulated in Law Number 13 of 2006 concerning the Protection of Witnesses and Victims which was later updated through Law Number 31 of 2014. In this provision, the term "cooperating perpetrator witness" is known, which is a criminal perpetrator who is willing to help law enforcement officials to uncover a larger crime or other perpetrators. This law provides a legal basis for the provision of protection and rewards to justice collaborators, including the possibility of obtaining leniency.

Furthermore, the Supreme Court Circular Letter (SEMA) Number 4 of 2011 provides technical guidelines for judges in handling cases involving justice collaborators. In the SEMA, it is emphasized that a justice collaborator must meet certain criteria, including: not the main perpetrator in the crime, admitting his actions, and providing significant and relevant information in uncovering the crime. If these conditions are met, the judge may consider granting leniency as a form of appreciation for his cooperation.

This arrangement shows that the reduction of sentences for justice collaborators is not an absolute right, but is conditional and depends on the judge's judgment. In other words, the Indonesian legal system gives discretion to judges to assess the quality and contribution of the perpetrator's cooperation in uncovering crimes.

From a criminal law perspective, the justice collaborator policy reflects a utilitarian approach in criminal theory. The main purpose of granting leniency is not solely to reduce the suffering of the perpetrator, but to achieve greater benefits for law enforcement and the interests of the community (Muladi & Arief, 2010). With the cooperation of the perpetrators, the evidentiary process can be simplified, the main perpetrators can be identified, and the crime network can be revealed more thoroughly.

However, the arrangement of justice collaborators in the Indonesian legal system still has some limitations. First, the provisions regarding the amount of sentence reduction are not explicitly regulated in the law, so it depends entirely on the judge's consideration. Second, there are no detailed provisions in the Criminal Code (KUHP) regarding the mechanism for criminal reduction based on the cooperation of perpetrators in general crimes, including murder. This creates potential inconsistencies in the application of various court decisions.

In addition, the regulation of justice collaborators must also be placed within the framework of the principle of equality before the law and legal certainty. Overly broad discretion without clear guidelines can lead to disparities in punishment and reduce public trust in the criminal justice system.

Therefore, it is necessary to harmonize regulations and more detailed guidelines so that the implementation of justice collaborators runs consistently and proportionately.

Thus, the legal arrangement of justice collaborators in the Indonesian legal system has a sufficient normative basis through the laws and policies of the Supreme Court. However, in terms of systematics and legal certainty, it is still necessary to strengthen regulations so that the provision of sentence reductions to cooperating perpetrators can be carried out in a more measurable, transparent, and in line with the principles of criminal justice.

B. Implementation of Justice Collaborator in the Crime of Murder

In judicial practice, not all perpetrators of the crime of murder who volunteer as justice collaborators automatically receive a reduction in their sentences. The judge in making the decision considers various aspects, including:

1. The role of the perpetrator in the crime (whether as the main perpetrator or participated);
2. The level of contribution of information provided in uncovering crimes;
3. Consistency and good faith during the investigation and trial process;
4. The impact of the act on the victim and the community.

The crime of murder is a serious crime that attacks the right to life as a fundamental human right. Therefore, judges tend to be careful in granting reductions in sentences so as not to give the impression that serious crimes can be "bargained" with certain cooperation.

In some rulings, judges granted leniency considering that the perpetrator was not the main actor and actively helped uncover other perpetrators who had a more dominant role. However, there are also decisions that reject the application for justice collaborator status because the perpetrator is considered the main perpetrator or the cooperation is not significant.

This shows that the implementation of justice collaborators in murder cases is highly dependent on the judge's discretion. Although the discretion of judges is part of judicial independence, differences in interpretation can cause disparities in decisions that have the potential to reduce legal certainty.

The implementation of justice collaborators in the crime of murder is a complex issue because it is at the intersection between the effectiveness of law enforcement and the demands of substantive justice. Murder as a crime against human life is categorized as a serious crime that morally and juridically has a major impact on the victim, the victim's family, and the community. Therefore, the implementation of the policy of reducing sentences against cooperating murderers must be carried out carefully and proportionately.

Normatively, there is no provision in the Criminal Code (KUHP) that explicitly regulates the reduction of sentences for murder perpetrators who are justice collaborators. The legal basis for its implementation is based more on Law Number 13 of 2006 as amended by Law Number 31 of 2014 concerning the Protection of Witnesses and Victims and the Supreme Court Circular Letter (SEMA) Number 4 of 2011. In practice, judges use these guidelines as a basis for consideration in imposing lighter penalties on perpetrators who are considered to have made a significant contribution to uncovering criminal acts.

In murder cases involving more than one perpetrator, the status of justice collaborator is usually submitted by one of the defendants who is not the principal offender, but participates (*medepleger*) or assists in the implementation of the criminal act. The implementation of this status is generally determined through several indicators, including: recognition of their actions, consistency of information from the investigation stage to trial, and real contribution in revealing the role of other more dominant perpetrators.

In judicial practice, judges tend to carefully consider whether the cooperation really provides added value in proving the case. If the defendant's statement is only a repetition of facts that have been known to the investigator, then the status of justice collaborator can be rejected. On the other hand, if the information provided plays an important role in dismantling the planning, intellectual actors, or main perpetrators of the murder, then the judge can grant a criminal reduction as a form of award.

However, the implementation of justice collaborators in the crime of murder faces several challenges. First, there are concerns that granting a reduction in sentences could hurt the victim's sense of justice, considering that murder is a violation of the fundamental right to life. Second, the lack of a detailed standard on the amount or proportion of sentence reductions has led to variations in verdicts in various courts. This has the potential to cause criminal disparities and legal uncertainty.

On the other hand, from the perspective of criminal policy, the implementation of justice collaborators in murder cases committed together can help uncover the structure of crime more comprehensively. In premeditated murder or murder cases involving more than one perpetrator, the cooperation of one of the defendants can be an important tool in identifying the main perpetrator or the party who has a dominant motive and role. Thus, the reduction of sentences is seen as a rational incentive in order to achieve broader law enforcement goals.

Furthermore, the application of justice collaborators in the crime of murder must pay attention to the balance between three main interests, namely the interests of the state in uncovering the crime, the interests of the victims in obtaining justice, and the interests of the perpetrators in getting fair treatment. The judge in this case plays a central role in assessing whether the reduction of sentence remains in line with the principle of proportionality and the purpose of the sentence.

Thus, the implementation of justice collaborator in the crime of murder is not automatic, but conditional and highly dependent on juridical considerations and the facts of the trial. In order for its application to be more consistent and provide legal certainty, more detailed guidelines are needed regarding the criteria and parameters for granting sentence reductions. Without clear standards, this policy has the potential to cause differences in interpretation that can reduce public trust in the criminal justice system.

C. Analysis of Effectiveness and Application Problems

From the results of normative analysis and judicial practice, it can be seen that the implementation of justice collaborators in the crime of murder faces several problems.

First, the lack of detailed criteria regarding the indicator of "significant cooperation" makes its application very subjective. The assessment of the perpetrator's contribution is often based on the judge's interpretation without measurable parameters.

Second, there is a tension between the goal of law enforcement effectiveness and the principle of retributive justice. In criminal theory, the crime must be proportional to the fault of the perpetrator. If the reduction in punishment is too large, this can create a perception of injustice for the victim's family.

Third, the absence of explicit provisions in the Criminal Code regarding the mechanism for criminal reduction for justice collaborators in general crimes, including murder, causes the legal basis to rely more on administrative policies (SEMA) and judges' interpretations.

However, functionally, the existence of justice collaborators has benefits in uncovering crimes committed together. In a murder case involving more than one perpetrator, the cooperation of one of the perpetrators can clarify the role of each and speed up the evidentiary process.

Therefore, it can be concluded that the effectiveness of justice collaborators in the crime of murder depends on the balance between the interests of law enforcement and the protection of the community's sense of justice. Clearer and more comprehensive standards are needed so that the implementation of sentence reduction can be carried out consistently, transparently, and proportionately.

The analysis of the effectiveness of the application of justice collaborators in the crime of murder must be placed within the framework of the goals of the criminal justice system, namely realizing justice, legal certainty, and utility. Conceptually, the policy of providing sentence reduction to cooperating perpetrators aims to increase the effectiveness of disclosure of criminal acts, especially those carried out jointly. With the cooperation of one of the perpetrators, law enforcement officials can obtain more accurate information about the role of each perpetrator, motive, and the construction of the criminal incident as a whole.

From the perspective of effectiveness, justice collaborators can make a real contribution in accelerating the evidentiary process. In homicide cases involving more than one perpetrator, information from cooperating perpetrators is often key to uncovering the main perpetrator or the party who has a dominant role. This is in line with the utilitarian approach in criminal theory, where crime functions not only as retribution, but also as a means to achieve broader social goals, including the effectiveness of law enforcement (Muladi & Arief, 2010). In this context, sentence reductions are seen as a rational incentive provided by the state to obtain greater benefits in the disclosure of crimes.

However, this effectiveness does not always run optimally in practice. One of the main problems is the lack of clear parameters regarding the criteria for "significant cooperation". The assessment of the perpetrator's contribution is entirely dependent on the judge's consideration. As a result, there is a potential for differences in interpretation between court decisions in cases that have similar characteristics. This condition has the potential to cause criminal disparities that can reduce legal certainty.

Another problem is the tension between the effectiveness of law enforcement and the principle of retributive justice. Murder as a crime against life has a very high moral and social dimension. Giving a reduction in sentences to the perpetrators of murder, even if they work together, can create a perception of injustice for the victim and his family. From a retributive perspective, the penalty must be imposed proportionally to the level of wrongdoing of the perpetrator. Therefore, the reduction of punishment must still pay attention to the principle of proportionality so as not to obscure the criminal responsibility of the perpetrator.

In addition, normatively, the regulation of justice collaborators relies more on the Law on the Protection of Witnesses and Victims and the Supreme Court Circular, while the Criminal Code does not explicitly regulate the mechanism for criminal reduction based on the cooperation of perpetrators in general crimes. The absence of an integrated arrangement in the material criminal legal system causes the legal basis for sentence reduction to be often seen as an administrative policy, rather than a systematic norm in the national criminal structure. This can cause uncertainty in the practice of its application.

On the other hand, there is also a risk of abuse of justice collaborator status. Perpetrators can volunteer as justice collaborators solely to obtain leniency without making a substantial contribution to the disclosure of the case. If the verification and evaluation mechanism is not carried out strictly, this policy has the potential to reduce the quality of evidence and even open up manipulation loopholes in the judicial process.

Thus, the effectiveness of the application of justice collaborators in the crime of murder depends on the balance between the interests of disclosing the crime and the principle of proportional justice. Clearer standards are needed regarding significant indicators of cooperation, proportionate penalty reductions, and objective evaluation mechanisms. Strengthening more systematic regulations in material criminal law is also needed so that justice collaborator policies are not only technical policies, but also an integral part of the national criminal system.

Overall, although justice collaborators have great potential in supporting the effectiveness of law enforcement, their application in the crime of murder must be carried out carefully, transparently, and consistently in order to remain in line with the principles of justice, legal certainty, and usefulness in the Indonesian criminal justice system.

4. CONCLUSION

Based on the results of research and discussion on the Implementation of the Rights of Cooperative Perpetrators (Justice Collaborator) to Get a Reduction in Punishment in the Crime of Murder, several conclusions can be drawn as follows:

First, normatively the regulation of justice collaborators in the Indonesian legal system has a legal basis through Law Number 13 of 2006 as amended by Law Number 31 of 2014 concerning the Protection of Witnesses and Victims, and strengthened by the Supreme Court Circular Letter Number 4 of 2011.

The arrangement provides space for perpetrators of criminal acts who cooperate to obtain protection and possible reduction of sentences, as long as they meet certain criteria such as not being the main perpetrator and providing significant information in uncovering criminal acts.

Second, the implementation of justice collaborator in the crime of murder is not automatic, but depends on the judge's assessment and consideration based on the facts of the trial. The judge considers the role of the perpetrator in the crime, the level of contribution of the information provided, the consistency of cooperation, and the impact of the act on the victim. In cases of murder committed jointly, the status of justice collaborator can play an important role in uncovering the main perpetrator or planning the crime. However, in practice, there are still differences in interpretations and variations in decisions related to the granting of sentence reductions.

Third, in terms of effectiveness, justice collaborator policies can support the acceleration and effectiveness of criminal disclosure, especially in crimes involving more than one perpetrator. However, its application in the crime of murder faces a number of problems, including the lack of clear parameters regarding significant indicators of cooperation, the potential for criminal disparities due to the wide discretion of judges, and the tension between utilitarian goals of law enforcement and the principle of retributive justice for victims.

Thus, although the justice collaborator policy has strategic value in the criminal justice system, its implementation in the crime of murder requires more detailed and integrated arrangements in the material criminal law system in order to ensure legal certainty, justice, and proportionality of punishment.

REFERENCES

- Ali, M. (2015). *Asas-asas hukum pidana*. Sinar Grafika.
- Arifin, R. (2018). Perlindungan hukum terhadap justice collaborator dalam sistem peradilan pidana di Indonesia. *Jurnal Hukum Ius Quia Iustum*, 25(2), 341–360.
- Dewi, A. A. I. (2019). Kedudukan justice collaborator dalam pembuktian perkara pidana. *Jurnal Magister Hukum Udayana*, 8(3), 402–415.
- Lestari, R. (2013). Penerapan justice collaborator dalam sistem peradilan pidana Indonesia. *Jurnal Ilmu Hukum*, 7(1), 85–98.
- Mahkamah Agung Republik Indonesia. (2011). *Surat Edaran Mahkamah Agung Nomor 4 Tahun 2011 tentang Perlakuan bagi Pelapor Tindak Pidana (Whistleblower) dan Saksi Pelaku yang Bekerja Sama (Justice Collaborator) dalam Perkara Tindak Pidana Tertentu*.
- Marzuki, P. M. (2020). *Penelitian hukum* (Edisi revisi). Prenadamedia Group.
- Muladi, & Arief, B. N. (2010). *Teori-teori dan kebijakan pidana*. Alumni.
- Prasetyo, T. (2017). Kebijakan hukum pidana dalam pemberian keringanan hukuman terhadap justice collaborator. *Jurnal Hukum dan Peradilan*, 6(2), 157–172.
- Republik Indonesia. (1946). *Kitab Undang-Undang Hukum Pidana (KUHP)*.
- Republik Indonesia. (2006). *Undang-Undang Nomor 13 Tahun 2006 tentang Perlindungan Saksi dan Korban*.
- Republik Indonesia. (2014). *Undang-Undang Nomor 31 Tahun 2014 tentang Perubahan atas Undang-Undang Nomor 13 Tahun 2006 tentang Perlindungan Saksi dan Korban*.
- Siregar, B. (2020). Analisis pertimbangan hakim dalam pemberian status justice collaborator pada perkara pidana. *Jurnal Yudisial*, 13(1), 45–60.
- Soekanto, S. (1986). *Pengantar penelitian hukum*. UI Press.