

The Application of Restorative Justice to Theft Offenses under Law Number 1 of 2023 concerning the Indonesian Criminal Code

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Abstract

The enactment of Law Number 1 of 2023 on the Indonesian Criminal Code has introduced a significant shift in Indonesia's criminal justice policy, moving beyond a punitive approach toward a framework that emphasizes the restoration of relationships among offenders, victims, and the community through restorative justice. This study examines the application of restorative justice in cases of theft under Law Number 1 of 2023 and explores the factors that influence its implementation within the Indonesian criminal justice system.

This research employs a normative legal research method, incorporating statutory, conceptual, and case-based approaches. The analysis relies on primary, secondary, and tertiary legal materials, which are examined qualitatively using a descriptive-analytical method to assess the legal framework governing restorative justice in theft cases.

The findings indicate that Law Number 1 of 2023 provides a stronger legal foundation for the application of restorative justice as an alternative mechanism for resolving criminal cases, particularly theft offenses that satisfy the prescribed legal requirements. Rather than focusing solely on punishment, this approach prioritizes the restoration of victims' losses, encourages offenders to assume responsibility for their actions, and seeks to rebuild social harmony while maintaining the fundamental principles of legal certainty, justice, and public benefit. Nevertheless, its implementation continues to encounter several challenges, including inconsistent interpretations among law enforcement authorities, the absence of comprehensive operational guidelines, and differing views regarding the categories of theft cases eligible for restorative settlement. These findings underscore the need to harmonize the existing regulatory framework and develop clear implementation guidelines to ensure that restorative justice is applied consistently, effectively, and in a manner that guarantees fair legal protection for all parties involved.

Keywords: *Restorative Justice; Criminal Offense; Theft; Indonesian Criminal Code*

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Introduction

The evolution of legal systems worldwide, from the colonial era to the present day, has profoundly influenced the development of Indonesia's legal framework. This historical trajectory has shaped the country's legal policy, particularly with respect to the substance, institutional structure, and legal culture that characterize the Indonesian legal system. In terms of legal substance, criminal law has developed into a comprehensive body of legislation that defines criminal offenses and prescribes corresponding sanctions to maintain legal order and protect public interests.[1]

Within the field of criminal law, criminalization constitutes an essential component of criminal policy. Criminal policy refers to the strategies adopted by the state to prevent and address crime as part of its broader responsibility to protect society and promote social welfare. Accordingly, criminal law serves not only as an instrument of punishment but also as a mechanism for safeguarding public order and supporting the realization of justice within the community.[2]

From a socio-legal perspective, crime is regarded as a social phenomenon that frequently emerges from structural inequalities and reflects the diverse patterns of human behavior shaped by social and economic conditions. Individuals experiencing economic hardship, social marginalization, or persistent financial pressure may be more susceptible to engaging in unlawful conduct, particularly when confronted with limited opportunities to meet their basic needs. Such circumstances may encourage short-term decision-making in which unlawful means are perceived as a practical solution for survival.[3]

Indonesia's criminal justice system has entered a new phase of legal reform through the modernization of its criminal law. One of the most significant developments is the incorporation of restorative justice as a guiding principle in resolving criminal cases. Unlike the traditional retributive model, which primarily emphasizes punishment as a response to wrongdoing, restorative justice seeks to restore the harm caused by criminal conduct by encouraging dialogue, accountability, victim recovery, and community participation. This approach also differs from compensatory justice, which focuses mainly on financial restitution, because restorative justice aims to rebuild social relationships and restore balance among offenders, victims, and society following the occurrence of a criminal offense and throughout the criminal justice process.[4]

Indonesia follows the civil law tradition, in which statutory legislation serves as the principal source of law. Nevertheless, judicial practice demonstrates that statutory provisions are not always capable of providing definitive solutions to every legal dispute. Certain legal norms remain ambiguous, incomplete, or contain regulatory gaps, requiring judges to interpret the law in order to determine its appropriate meaning and ensure that it can be applied consistently to the facts of individual cases.[5]

The development of Indonesian criminal law reflects a gradual transition from a punishment-oriented system toward a framework that places greater emphasis on restoration and reconciliation. This transformation is embodied in Law Number 1 of 2023 on the Indonesian Criminal Code, which introduces a sentencing philosophy based on balancing the interests of victims, offenders, society, and the State. The reform represents a significant shift in national criminal law by recognizing that criminal sanctions should not merely function as instruments of retribution but should also contribute to repairing the social disruption caused by criminal conduct. Consequently, criminal proceedings are expected to produce substantive justice through the restoration of social relationships rather than focusing exclusively on the imposition of penal sanctions.[6]

One of the most significant innovations introduced through this reform is the recognition of restorative justice as an integral component of the criminal justice system. Under this approach, crime is understood not only as a violation of the State's legal order but also as an act that causes harm to victims and the wider community. Accordingly, the resolution of criminal cases is directed toward repairing that harm, encouraging offenders to acknowledge and assume responsibility for their conduct, and restoring social harmony through voluntary agreements reached by the parties involved. Restorative justice therefore provides an alternative dispute resolution mechanism that seeks to balance the protection of victims' rights, legal certainty, and the rehabilitation of offenders without compromising the broader objectives of criminal law enforcement.

Restorative justice may also be understood as a participatory process conducted either within or alongside the criminal justice system, involving victims, offenders, their respective families, members of the community, and other relevant stakeholders. Through dialogue and mutual participation, these parties work collectively to identify appropriate solutions to the consequences of criminal behavior. Rather than emphasizing retaliation or purely punitive measures, the restorative model prioritizes accountability, reconciliation, and the restoration of losses suffered by victims and the community.[7]

The relevance of restorative justice becomes particularly evident in cases involving theft offenses. Theft remains one of the most frequently prosecuted crimes in Indonesia, encompassing a broad spectrum of conduct ranging from minor property offenses to cases involving substantial economic losses. In practice, however, not every theft case warrants the same degree of penal intervention. For cases involving relatively limited losses or particular mitigating circumstances, restorative mechanisms—such as mediation, restitution, formal apologies, and negotiated settlements—may provide outcomes that are more responsive to the interests of both victims and offenders while reinforcing social cohesion. Such mechanisms often achieve more meaningful justice than conventional criminal proceedings that culminate solely in punishment.

Despite its growing recognition, the implementation of restorative justice in theft cases continues to encounter significant legal and institutional challenges. Differences in the

interpretation of eligibility criteria among law enforcement authorities frequently result in inconsistent decision-making throughout the criminal justice process. Moreover, a conventional view persists that every theft offense must proceed through the formal court system regardless of the nature of the offense, the extent of the harm suffered, or the preferences of the victim. These conditions indicate that, although existing legislation and institutional policies have increasingly accommodated restorative justice, its practical application remains uneven. Greater regulatory harmonization and clearer implementation guidelines are therefore required to ensure that restorative justice can be applied consistently, fairly, and effectively in accordance with the objectives of Indonesia's contemporary criminal law reform.

The Draft of the Indonesian Criminal Code represented a comprehensive reform of substantive criminal law aimed at replacing the colonial criminal code with a legal framework that reflects Indonesia's constitutional values, national identity, and contemporary social aspirations. Rather than merely revising isolated statutory provisions, the reform was designed to establish a new philosophy of criminal law consistent with the country's legal ideals. In this respect, the enactment of the new Criminal Code constitutes not only legislative modernization but also a deliberate instrument of social and cultural transformation intended to support the development of a legal system grounded in Indonesian values.[8]

Law Number 1 of 2023 on the Indonesian Criminal Code marks a fundamental shift in the objectives of criminal punishment. Under the new framework, sentencing is no longer conceived solely as a means of retribution but also as a mechanism for resolving conflicts, restoring social equilibrium, protecting the community, and facilitating the rehabilitation of offenders. These objectives closely correspond with the principles of restorative justice that have gradually gained recognition within Indonesia's legal system. Consequently, the application of restorative justice in theft cases should not be viewed merely as an exceptional policy or discretionary practice, but rather as an integral component of Indonesia's broader criminal law reform and its commitment to a more humane and justice-oriented criminal justice system.

The effective implementation of restorative justice, however, depends on more than legislative reform alone. Its success is equally influenced by the institutional capacity of law enforcement agencies and the prevailing legal culture within society. Judges, prosecutors, police officers, and other criminal justice actors must share a common understanding of the philosophical foundations and practical objectives of restorative justice. At the same time, victims, offenders, and community members should be afforded meaningful opportunities to participate in the resolution process. Without coherent institutional coordination and a shared interpretation of restorative justice principles, the application of this approach is likely to remain inconsistent across different stages of criminal proceedings.

For this reason, many disputes are increasingly resolved through consensual mechanisms outside the formal court system. Non-litigation procedures, including mediation and negotiated settlement, are often regarded as more efficient, less adversarial, and better

suited to producing mutually beneficial outcomes for the parties concerned. By contrast, litigation generally culminates in a judgment that identifies a prevailing party and a losing party, frequently leaving one side dissatisfied with the outcome. Restorative processes therefore offer a constructive alternative by promoting dialogue, consensus, and voluntary compliance rather than emphasizing adversarial confrontation.[9]

The growing reliance on alternative dispute resolution in criminal matters is also supported by practical and moral considerations. Restorative settlement commonly arises where offenders acknowledge responsibility, express genuine remorse, and reach an agreement with victims to resolve the consequences of the offense peacefully. Within criminal law doctrine, such considerations are closely associated with the concepts of justifications and excuses. Justifications concern the legal permissibility of the conduct itself, whereas excuses relate to the personal circumstances or mental state of the offender that may diminish or eliminate criminal responsibility. These doctrinal principles provide an important foundation for evaluating circumstances in which restorative mechanisms may appropriately complement conventional criminal sanctions.[10]

Previous scholarship has predominantly examined restorative justice from the perspectives of prosecution policy, police investigations, or institutional guidelines governing criminal case settlement. Comparatively little attention has been devoted to assessing the implementation of restorative justice in theft offenses within the normative framework established by Law Number 1 of 2023 on the Indonesian Criminal Code. This gap is significant because the enactment of the National Criminal Code has introduced a new philosophy of punishment that requires comprehensive analysis from both doctrinal and practical perspectives. Accordingly, further research is needed to clarify the relationship between restorative justice principles and the criminal law policies embodied in Indonesia's newly reformed Criminal Code.

Against this background, examining the application of restorative justice to theft offenses under Law Number 1 of 2023 is both timely and necessary. Such research is expected to provide a comprehensive assessment of the legal basis, scope, and practical challenges associated with implementing restorative justice in theft cases while offering recommendations for the continued development of Indonesia's national criminal law policy. Beyond its contribution to the advancement of criminal law scholarship, the findings are also expected to serve as a practical reference for law enforcement authorities in promoting a criminal justice system that prioritizes fairness, restoration, and social reconciliation in accordance with the objectives of Indonesia's contemporary criminal law reform.

Methods

2.1. Research Design

This study adopts a normative legal research design, which focuses on the examination of legal norms embodied in statutory legislation, judicial decisions, legal doctrines, and other

authoritative legal sources relevant to the research problem. Rather than investigating social behavior through empirical observation, normative legal research seeks to analyze the legal framework governing a particular issue. [12] Accordingly, this study concentrates on the legal principles and regulatory framework governing the application of restorative justice to theft offenses under Law Number 1 of 2023 on the Indonesian Criminal Code.

The selection of a normative legal approach is consistent with the objectives of the study, namely to examine the legal foundations, underlying principles, scope, and implementation of restorative justice in resolving theft offenses within Indonesia's positive legal system. To achieve these objectives, the research systematically reviews legal instruments and scholarly literature concerning restorative justice, sentencing policy, national criminal law reform, and legal policies regulating the settlement of criminal cases outside conventional punitive mechanisms.

Three complementary research approaches are employed. First, the statutory approach is used to examine the provisions of Law Number 1 of 2023 together with other relevant legislation governing restorative justice. Second, the conceptual approach provides the analytical framework for understanding restorative justice through legal theories and scholarly doctrines. Third, the case approach is utilized to analyze judicial decisions and legal practices involving theft cases resolved through restorative justice, thereby providing practical insight into the implementation of the relevant legal framework.[13]

2.2. Nature of the Research

This research is descriptive-analytical in nature. It is descriptive because it systematically explains the legal provisions governing the application of restorative justice to theft offenses as stipulated in Law Number 1 of 2023 and its implementing regulations. The discussion encompasses the objectives of sentencing, the legal requirements for applying restorative justice, and the position of restorative mechanisms within Indonesia's criminal justice system.[14]

At the same time, the study is analytical because it goes beyond describing existing legal norms to critically evaluate their consistency with the principles of restorative justice developed in legal scholarship and law enforcement practice. The analysis assesses the extent to which the current legal framework protects victims' rights, provides legal certainty for offenders, and advances the fundamental objectives of criminal law, namely justice, legal certainty, and social utility. Through this analytical approach, the research seeks to formulate legal arguments concerning the effectiveness of restorative justice in addressing theft offenses while identifying the institutional and regulatory factors that facilitate or impede its implementation within Indonesia's criminal justice system.

2.3. Data Collection Method

The study relies exclusively on library research as its method of data collection. All data are derived from secondary sources obtained through a systematic review of legal materials relevant to the research topic. These materials are categorized into primary, secondary, and tertiary legal sources.[15]

Primary legal materials consist of the 1945 Constitution of the Republic of Indonesia, Law Number 1 of 2023 on the Indonesian Criminal Code, the Indonesian Code of Criminal Procedure, Attorney General Regulation Number 15 of 2020 concerning the Termination of Prosecution Based on Restorative Justice, National Police Regulation Number 8 of 2021 concerning the Handling of Criminal Offenses Based on Restorative Justice, together with other statutory instruments governing the resolution of theft offenses.

Secondary legal materials include scholarly books on criminal law, peer-reviewed journal articles, research reports, dissertations, master's theses, and academic commentaries addressing criminal law reform, sentencing objectives, and restorative justice. Tertiary legal materials comprise legal dictionaries, legal encyclopedias, legislative indexes, and other reference works that assist in interpreting and contextualizing primary and secondary legal sources.

The collection of legal materials is conducted through a systematic process of identification, inventory, classification, and critical examination of all relevant legal sources. Subsequently, the collected materials are analyzed qualitatively using methods of legal interpretation and legal reasoning. The analysis follows a deductive mode of reasoning, beginning with general legal principles and statutory provisions before applying them to the specific issue of restorative justice in theft offenses under Law Number 1 of 2023. This methodological approach enables the study to produce conclusions that are coherent, logically structured, and academically well-founded.

Result and Discussion

3.1 The Application of Restorative Justice to Theft Offenses under Law Number 1 of 2023 on the Indonesian Criminal Code

The enactment of Law Number 1 of 2023 on the Indonesian Criminal Code represents a fundamental transformation in Indonesia's sentencing philosophy. Whereas the previous Criminal Code primarily emphasized punishment as a form of retribution against offenders, the newly enacted National Criminal Code adopts a more balanced approach by recognizing restoration as one of the principal objectives of criminal punishment. This orientation is expressly reflected in Article 51, which provides that sentencing is intended to prevent future criminal conduct, facilitate the social reintegration of offenders through rehabilitation, resolve conflicts arising from criminal acts, restore social equilibrium, and strengthen the public's sense of security. Although the term *restorative justice* is not explicitly employed in the provisions governing theft offenses, the statutory objectives of punishment clearly embody the underlying

principles of restorative justice and demonstrate their incorporation into Indonesia's contemporary criminal law policy.

The legal regulation of theft offenses is contained in Book Two, Chapter XXII of the National Criminal Code, which governs crimes against property. This chapter classifies theft into several categories, including ordinary theft, aggravated theft, violent theft under separate provisions, and theft committed within a family relationship. These offenses are regulated under Articles 476–485, reflecting the legislature's intention to distinguish between varying degrees of criminal seriousness. Consequently, the legal response to theft should take into account the proportionality of punishment, the offender's degree of culpability, the extent of the victim's loss, and the broader social consequences of the offense. This graduated legislative structure provides law enforcement authorities with sufficient discretion to adopt more proportionate and restorative responses in cases involving relatively minor criminal conduct. From a normative perspective, the implementation of restorative justice in theft cases is supported not only by the sentencing objectives established in the National Criminal Code but also by several sector-specific regulations. These include Attorney General Regulation Number 15 of 2020 concerning the Termination of Prosecution Based on Restorative Justice and National Police Regulation Number 8 of 2021 concerning the Handling of Criminal Offenses Based on Restorative Justice. Both regulations establish procedural criteria for resolving criminal cases through restorative mechanisms, including the existence of a voluntary settlement between the offender and the victim, the offender's acknowledgment of responsibility, compensation or restoration of the victim's losses, and the absence of any adverse impact on public order. Accordingly, Law Number 1 of 2023 reinforces these regulatory developments by embedding restorative principles within the broader philosophy of Indonesia's criminal justice reform.

Viewed through the theoretical framework of restorative justice, imprisonment should not be regarded as the inevitable outcome of every theft offense. In cases involving relatively minor losses, first-time offenders, and the absence of violence, negotiated settlement through dialogue and mutual agreement may better fulfill the objectives of justice and social utility. Under such circumstances, victims receive prompt restitution, offenders assume responsibility for the consequences of their conduct, and the community benefits from the peaceful resolution of conflict without prolonged hostility. Furthermore, restorative settlement contributes to reducing prison overcrowding, which continues to present a significant challenge within Indonesia's correctional system.

A practical illustration of restorative justice can be found in the resolution of an illegal timber theft case handled by the Blora District Police, Central Java, under Police Report Number LP/B/53/VII/2021/SPKT/POLRES BLORA/POLDA JATENG. In this case, the offender unlawfully removed five logs of *Dalbergia latifolia* (sonokeling) belonging to the State and managed by the Cepu Forest Management Unit (KPH Cepu). During the investigation, police investigators facilitated direct dialogue between the offender and the injured party. After all procedural requirements stipulated in National Police Regulation Number 8 of 2021 had been satisfied, the parties reached a settlement agreement, the seized timber was returned, and the matter was concluded through restorative justice without proceeding to criminal prosecution or trial. This case illustrates that criminal accountability

may be effectively achieved through restoration when the interests of all parties have been adequately addressed.[16]

The analysis of this case demonstrates that the successful implementation of restorative justice depends upon several essential conditions. First, the offender must voluntarily acknowledge responsibility and demonstrate a genuine willingness to remedy the harm caused. Second, the victim must be prepared to accept reconciliation after receiving appropriate restitution or other forms of recovery. Third, investigators must perform an impartial facilitative role by safeguarding the legitimate interests of both parties throughout the negotiation process. Finally, the settlement should receive acceptance from the surrounding community so that it does not undermine public confidence in the administration of justice. Collectively, these factors ensure that restorative justice is understood not as an exemption from criminal responsibility but as a more effective and equitable mechanism for resolving criminal conflict. Despite its normative foundation, the implementation of restorative justice in theft cases continues to face significant challenges. One of the principal obstacles is the absence of a uniform understanding among law enforcement authorities regarding the categories of theft cases that qualify for restorative settlement. In practice, differing interpretations remain concerning acceptable thresholds of financial loss, the seriousness of the offender's culpability, and the extent to which public interests must be protected. These inconsistencies have resulted in uneven application across different jurisdictions, creating the potential for disparities in criminal law enforcement.

From the perspective of criminal law reform, Law Number 1 of 2023 should serve as a catalyst for strengthening restorative justice as an integral component of Indonesia's criminal justice system. The sentencing objectives articulated in Article 51 provide a clear philosophical foundation by recognizing that criminal proceedings should pursue not only punishment but also conflict resolution, social reconciliation, and the restoration of community balance. Consequently, the application of restorative justice in theft cases should be regarded as a practical manifestation of modern sentencing philosophy that seeks to reconcile the principles of legal certainty, justice, and social utility.

Overall, the analysis indicates that the application of restorative justice to theft offenses under Law Number 1 of 2023 rests upon a strong philosophical foundation derived from the statutory objectives of punishment, while its operational implementation is supported by Attorney General Regulation Number 15 of 2020 and National Police Regulation Number 8 of 2021. The classification of theft offenses under Book Two, Chapter XXII provides the legal framework for distinguishing among different forms of theft, whereas restorative justice functions as an alternative mechanism for resolving eligible cases in accordance with applicable legal requirements. Rather than conflicting with the principles of criminal law enforcement, restorative justice complements them by promoting a criminal justice system that is more humane, proportionate, effective, and responsive to the restoration of relationships among offenders, victims, and the wider community.

Conclusion

Based on the findings and discussion, this study concludes that the application of restorative justice to theft offenses under Law Number 1 of 2023 on the Indonesian Criminal Code constitutes an integral component of Indonesia's ongoing criminal law reform, which seeks to balance the principles of legal certainty, justice, and social utility. Although theft remains classified as a criminal offense subject to penal sanctions under the National Criminal Code, the statutory objectives of sentencing reflect a significant shift from a predominantly retributive model toward a framework that prioritizes conflict resolution, victim restoration, offender rehabilitation, and the restoration of social harmony. Accordingly, restorative justice possesses a clear philosophical foundation within Indonesia's criminal justice system and may be applied to theft cases that satisfy the legal requirements established under the applicable statutory and regulatory framework.

In practice, the implementation of restorative justice in theft cases is not governed exclusively by Law Number 1 of 2023, but is further supported by Attorney General Regulation Number 15 of 2020 concerning the Termination of Prosecution Based on Restorative Justice and National Police Regulation Number 8 of 2021 concerning the Handling of Criminal Offenses Based on Restorative Justice. Together, these regulatory instruments provide the operational framework for applying restorative justice in appropriate cases. When the prescribed legal conditions are fulfilled particularly where the offense has caused limited social harm, the offender is a first-time offender, the victim has been adequately compensated, and a voluntary settlement has been achieved the restorative approach offers a dispute resolution mechanism that is more effective, efficient, and equitable than conventional punitive proceedings. Consequently, restorative justice should be regarded not as an alternative that weakens criminal law enforcement, but as a complementary mechanism that advances a more humane, responsive, and balanced criminal justice system while preserving the fundamental objectives of Indonesia's National Criminal Code.

References

- [1] Sakramen Sembiring, Abdul Rahman Maulana Siregar, and Sumarno. (2025). Efforts to Achieve Legal Certainty in the Authority to Calculate State Losses in Corruption Cases. In Proceedings of the International Conference on Islamic Community Studies.
- [2] Ismaidar and Syahrannuddin. A Legal Analysis of the Implementation of the Anti-Money Laundering Law in the Eradication of Corruption in Indonesia. Jurnal Hukum Responsif FH UNPAB, pp. 1–16.
- [3] Rahmayanti. (2023). A Criminological Study of Juvenile Offenders in Violent Motorcycle Theft Cases. Jurnal Hukum, Politik dan Ilmu Sosial (JHPIS), Vol. 2, No. 3, pp. 292.

- [4] Nugraha Manuella Meliala, Ismaidar, and Muhammad Arif Sahlepi. (2024). The Application of Restorative Justice by the Medan District Court to Achieve Legal Certainty in Criminal Case Resolution. *Jurnal Ilmu Hukum, Humaniora dan Politik (JIHHP)*, Vol. 3, No. 4.
- [5] Nurul Aini, Abdul Rahman Maulana Siregar, Radhitya Wiguna, and Razi Fajri Asyari Siregar. (2026). Methods of Judicial Interpretation in Legal Reasoning by Judges in Indonesia. *Al-Zayn: Jurnal Ilmu Sosial dan Hukum*, Vol. 4, No. 1.
- [6] Barda Nawawi Arief. (2017). *Selected Essays on Criminal Law Policy: Developments in the Formulation of the New Indonesian Criminal Code*. Jakarta: Kencana.
- [7] Rahul Adrian Fikri, Abdul Rahman Maulana Siregar, and Fitri Rafianti. (2022). Restorative Justice Efforts to Provide a Sense of Justice for Children. *International Journal in Management and Social Science*, Volume 10, Issue 10, ISSN: 2321-1784.
- [8] Gilang Gemilang and Ismaidar. (2024). The Politics of Restorative Justice in Indonesia's Criminal Law Reform. *INNOVATIVE: Journal of Social Science Research*, Volume 4, Number 1, pp. 7370–7382.
- [9] Abdul Rahman Maulana Siregar, Rahul Ardian Fikri, and Mhd. Azhali Siregar. (2023). A Dispute Settlement Procedure Outside Court in Nagori Silau, Paribuan, Simalungun District. *International Journal in Management and Social Science*, Volume 11, Issue 4.
- [10] Muhammad Arif Sahlepi. (2022). *Understanding the Fundamentals of Criminal Law: A Systematic and Practical Approach*. National Library of Indonesia: Cataloging in Publication (CIP), July 2022, p. 308.
- [11] Attorney General Regulation Number 15 of 2020 concerning the Termination of Prosecution Based on Restorative Justice; National Police Regulation Number 8 of 2021 concerning the Handling of Criminal Offenses Based on Restorative Justice.
- [12] Peter Mahmud Marzuki. (2021). *Legal Research (Revised Edition)*. Jakarta: Kencana, p. 138.
- [13] Johnny Ibrahim. (2013). *Theory and Methodology of Normative Legal Research*. Malang: Bayumedia Publishing, p. 59.
- [14] Soerjono Soekanto and Sri Mamudji. (2015). *Normative Legal Research: A Brief Overview*. Jakarta: Rajawali Pers, p. 19.
- [15] Mukti Fajar ND and Yulianto Achmad. (2017). *The Dualism of Normative and Empirical Legal Research*. Yogyakarta: Pustaka Pelajar, p. 34.
- [16] Case Study on the Resolution of an Illegal Timber Theft Case at the Blora District Police, Police Report Number LP/B/53/VII/2021/SPKT/POLRES BLORA/POLDA JATENG. Law Number 1 of 2023 on the Indonesian Criminal Code.