

Implementation of Customary Criminal Sanctions in Efforts to Resolve the Criminal Act of Lokika Sanggraha (Study of Decision NO.997/PID.SUS/2019/PN.DPS)

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Abstract

Within the scope of Balinese traditional society, every criminal act or violation of the law related to decency or Lokika Sanggraha will be subject to special customary sanctions. Decency and Lokika Sanggraha have values and rules that are highly respected. Lokika Sanggraha regulates customary criminal acts related to decency, such as sexual relations outside of marriage that result in pregnancy and are terminated without a clear reason. Law enforcement against Lokika Sanggraha is very important for Balinese traditional society because it violates the sense of justice in society. This study covers two issues of primary concern, namely the application of customary criminal sanctions in cases of customary criminal acts of Lokika Sanggraha in Court Decisions and can it be said that the application of customary criminal sanctions of Lokika Sanggraha is fair and effective according to the perspective of customary law and national law. The purpose of this paper is to understand the enforcement of criminal law in the context of custom and its relationship to positive Indonesian law. This study uses a normative juridical method by reviewing related literature. The results of the study indicate that customary law communities in Indonesia receive recognition and protection by the constitution. In addition, this study explains how sanctions are imposed on perpetrators of of Lokika Sanggraha to protect the rights and justice for women.

Keywords: Lokika Sanggraha, Criminal Act, Sanctions

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Introduction

Indonesia is one of the countries that implements a life based on legal principles. Article 1 paragraph (3) of the 1945 Constitution states that the State of Indonesia is a state of law (*rechtstaat*). The laws applied in Indonesia include written laws derived from positive law and the Act, as well as unwritten laws rooted in the traditions of customary customs that grow and live in indigenous communities. This unwritten law is known as customary law (*the living law*). Although the basis of criminal law used in Indonesia is contained in the Criminal Code, it is possible that there are other legal bases such as customary law, which are still adhered to and continue to develop with a number of certain legal limitations.

Customary law is a rule or norm, custom, tradition that is passed down continuously carried out by the community and is highly respected and obeyed. Customary law is often related to daily life, social structure, and cultural values and customary law can also be flexible and can change according to the development of society, but still maintains its cultural roots. In general, recognition of customary law can be found in Indonesian legal policy, as regulated in Article 18B paragraph (2) of the 1945 NRI Constitution. This article states that: "The state recognizes and respects customary law community units along with their traditional rights as long as they are still alive and in accordance with the development of society and the principles of the Unitary State of the Republic of Indonesia as regulated in law". However, in its development, the Indonesian legal system tends to adopt western law (*Civil Law and Common Law*) which results in the neglect of customary law, even though customary law is considered more contextual to the context of Indonesian society (Fatmawati D, 2023)

In the context of customary law, there is what is understood as customary criminal law. Customary criminal law refers to a set of unwritten provisions that regulate behavior that is considered to violate justice and disrupt the balance within the scope of customary society, which then gives rise to reactions from the community. This reflects the traditional legal system and the existence of customary communities in various parts of the world, where social norms and cultural values play a significant role in determining the rules and sanctions for violations. As a component of a broader social structure, customary criminal law often functions to maintain balance, maintain order, and strengthen norms that are considered important for the survival of the customary community.

Bali Province is an area in Indonesia whose customary law is quite adhered to and accepted by the community, all of which is due to culture and the inherent religious elements that also influence it. A category of customary criminal acts that can be proposed to the Court is *Lokika Sanggraha*. According to the Adhigama Book, *Lokika Sanggraha* refers to a love affair that results in a man and a woman leading to a husband and wife relationship or a sexual aspect that is not legally bound in marriage according to national law and Balinese customs. (Dewi, Ni Made Liana, 2016)

The term *Lokika Sanggraha* comes from Sanskrit, which can be interpreted as rational consideration, calculation, estimation, or thinking. The word "sanggraha" itself means to serve or serve. This act of serving or serving can have good or bad meanings, depending on the context and intention underlying the service, as well as the passion offered in the service process. *Sanggraha* or serving aims to make the party receiving the service feel satisfied, enjoyable and so on (Pitriyantini Eka Putri, 2019)

The crime of *Lokika Sanggraha* occurs when a woman and a man who are not bound by marriage have a romantic relationship, which then continues to an intimate relationship based on mutual consent. However, after the woman becomes pregnant, the man leaves her without giving a clear reason and ends the relationship. According to *the Adhigama Book*, the legal provisions to protect women who are victims of this crime are in the form of a fine of 24,000 Rupiah (Izzatul, Lailah. (2014)). In Indonesian Law, the customary crime of *Lokika Sanggraha* has not been included in the Criminal Code, especially in this context, but in its development, many customary crimes have increasingly emerged over time. In the context of Article 284 of the Criminal Code, it states that in principle, a person who engages in sexual acts or intimate relations outside of marriage that are carried out consensual is not subject to criminal sanctions, the exception is if it can be proven that there has been adultery, namely that one of the parties involved is already bound by marriage. However, intercourse carried out by force (rape) in accordance with the provisions of Article 285 of the Criminal Code, is still considered a criminal act that can be punished. While Article 286 of the Criminal Code regulates sexual acts with women who are helpless or unconscious. While Article 287 of the Criminal Code states that a person can be subject to criminal sanctions if involved in sexual relations outside of marriage, even though it is understood that the woman is not yet fifteen years old or her age is still unclear, so she is not yet eligible to marry.

However, in the context of the Bali District Court, the crime of *Lokika Sanggraha* was once the basis for deciding a case. This is of concern because it illustrates the recognition and use of customary law in the judicial system in the area. Although not yet officially regulated in National Legislation, the use of the crime of *Lokika Sanggraha* shows the diversity of legal culture in Indonesia, where customary law still plays an important role in resolving cases in several regions.

From the previous background explanation, the problem that can be formulated is regarding how to apply customary criminal sanctions to *Lokika Sanggraha* which are applied through Court Decisions, and also whether it can be said that the application of customary criminal sanctions for *Lokika Sanggraha* is fair and effective from the perspective of customary law and national law.

Research methods

The method applied by the author in this study is to use the type of normative legal research. Normative legal research is research that refers to research that focuses on legal aspects using secondary data as study material, such as using Legislation, norms, Court Decisions, legal theories, opinions of legal experts. This study uses analytical descriptive analysis, which aims to describe or present valid and complete data regarding zero verdict regulations. The data analyzed includes primary and secondary data, such as literature, theory, doctrine, and legislation, all of which are used to solve the problems studied. (Siregar, F., & Sitorus, N. (2022).

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Results and Discussion

1. The application of customary criminal sanctions against *Lokika Sanggraha* which is implemented through a Court Decision.

Customary law is a legal system that develops in society, grows and adapts according to existing social life, where law and society are closely related. The existence of law cannot be separated from society because law appears together with the existence of society itself. The term "*ubi societas ibi ius*" illustrates that law is always present where there is society, indicating that law cannot be separated from the existing social context.

According to B Ter Haar Bzn, customary law includes all provisions that are manifested in the policies of the customary leader that are directly applied in society." (Hadikusuma Himan, 1989) Ter Haar is known for his "Decision" theory, which states that to find out whether a custom has been considered part of customary law, it is necessary to see the approach of the ruler of the legal community to violations of the customary regulations. If the ruler determines the decision of punishment for the violators. So, the customs can be considered customary law. Therefore, customary law is a real manifestation of referring to the social and cultural norms that apply in society. In the context of Balinese society, unlimited association and intimate relationships outside of marriage are considered very reprehensible, because they violate the basic norms upheld by Balinese society (Harisman, 2019)

Balinese society has customary law known as *Lokika Sanggraha*. This customary crime is rooted in Hindu teachings and is stated in *the Adhigama Book*, a Hindu religious law book compiled during the Majapahit Kingdom. Balinese society obeys this rule because they uphold Hinduism as the main religion they practice and adhere to the values contained in the teachings of that religion. In Article 359 of the Adhigama Book, it is explained that *Lokika Sanggraha* is a customary crime involving sexual relations between a man and a woman with a promise to marry, but then the man refuses to keep his promise, resulting in pregnancy in the woman (Wulan Nawang Siva & Triwati Ani, 2023) Article 359 of the Adhigama Book reads: *Malih Lokika Sanggraha loewir ipoen, jadma mademenan, sane mowani nerehang demen ipoen, ngererehang daja, soebajan iloeh kesanggoepin, wastaering pepadoean, toengkas forcingne, sane loeh ngakoe kasanggama, sane mowani ngelisan mepaksa ngoecapang dewek ipoen kaparikosa antoek iloeh, jan asapoenika patoet drops frankly pisan, jan djati imowani accompanies the authority of ipoen Sisipang danda oetama sahasa 24,000, poenika mawasta Lokika Sanggraha*, which means *Lokika Sanggraha* is, a man and a woman involved in a romantic relationship, where the man is unfaithful because he is afraid of being blamed, trying to find reasons to justify his actions. The woman's promise is accepted, but finally when brought to court, their confessions are different. The woman claims to have had sex, while the man suddenly suddenly stated that he was raped by the woman. In cases like this, further investigation must be carried out to reveal the truth. If the man does love and should be held accountable for his actions with a major fine of 24,000 kepeng money, this act is called *Lokika Sanggraha*. (Artadi, I. Ketut, 1980)

Customary criminal law which can also be termed as "Customary Criminal Law" or "Customary Violation Law" is a customary regulation that is a reference for indigenous people to regulate a mistake that results in disharmony in community life. Thus, follow-up is needed where for the community the action is very detrimental to community life.

Customary criminal law is not actually bound by regulations in Indonesian positive law, such as those regulated in the Criminal Code (KUHP), which adheres to the principle of legality which is stated in Article 1 paragraph (1) which states that "An act cannot be punished, except based on the power of existing criminal legislation".

This regulation emphasizes the need for Criminal law must have a written legal basis, while customary law refers to laws that are not codified in writing, on the other hand accepted and applied in the context of society. In order to accommodate the application of this customary criminal law, therefore, the principle of legality is applied more broadly, including the principles of formal and material legality. However, the application of the principle of material legality is carried out with several limitations, namely: a. depending on the context by considering the circumstances and dynamics of the customary community, b. the criminal sanctions imposed must respect customary law and be in line with the values of Pancasila, c. limited to certain legal subjects, namely communities that are within the scope of customary law that has been violated, d. functions as a *premm remedium* for certain cases. Thus, it is possible to compile a compilation of customary crimes as a reference in enforcing criminal law (Anjari Warih, 2017). And in the application of customary criminal law, Bali has the authority to affirm the existence of a strong customary law community and the support of Regional Regulations which are formally regulated in Bali Provincial Regulation No. 4 of 2019, this regulation mandates each customary village to have *awig-awig*, and the Balinese people can implement customary criminal law effectively, maintain traditional values, and ensure social justice within the scope of the Balinese customary community.

Delik Lokika Sanggraha is a customary law that continues to be applied in the Balinese community. According to Van Vollenhoven, customary *delik* can be defined as a violation that must be avoided, even if in reality the violation or act is considered a minor error. (Hilman Hadikusuma, 2003)

According to some opinions classifying violations of customary law as criminal offenses. However, the term "Criminal" may not be inappropriate, because some consider customary law to be merely a denial of the prevailing customary rules, which is a form of attitude that disturbs the peace of life and which also includes social behavior in the form of norms in society, generally not in written form.

In deciding criminal cases of *Lokika Sanggraha* crimes, judges are required to adapt to the dynamics of the law, where the law is not only in the form of written law, but also includes the implied meaning in the unrecorded context that exists in society, Law No. 48 of 2009 concerning Judicial Power, regulates this in Article 5 paragraph (1). This article emphasizes that judges and constitutional judges are required to explore, follow, and understand the legal values and sentiments of justice that develop in society. This also includes aspects of customary criminal law, both in terms of material and substance, which are a matter of concern for judges in Indonesia, including issues related to morally defective actions or nature that is materially contrary to the law in indigenous communities in Indonesia. Therefore, a careful attitude is needed in assessing whether an action is considered reprehensible according to Indonesian community standards. (Pitriyantini Eka Putri, 2019)

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For example, the application of criminal sanctions for *Lokika Sanggraha* crimes in Decision No.997/Pid.Sus/2019/PN.Dps is a case involving defendant I Dewa Gede Ardanda with witness Ni Putu Dwik Supartini who has been examined and also has the statement of an expert, namely, Dr. Ni Nyoman Sukerti, SH, MH, according to him, that the defendant's actions against the victim are very worthy of being classified as an act violating *Lokika Sanggraha* customary law because the elements in the Adhigama Book regulations related to customs have been fulfilled and can still be implemented in the judicial process in Indonesia, especially Bali, because the provisions in the Criminal Code and other national laws and regulations cannot be used as a legal foundation for punishing the defendant *Lokika Sanggraha* .

And before examining the elements of Article 359 of the Adhigama Book, where the Defendant was not charged with national law, from that the Panel of Judges will first consider the basis for the application of Article 359 of the Adhigama Book. However, based on Article 5 paragraph (3) letter b of Emergency Law No. 1 of 1951 concerning Temporary Measures to Organize the Unity of the Power Structure and Procedure of Civil Courts, Article 5 paragraph (3) letter b explains that if a legal case handled by a customary court or a self-government court has no comparison with the Criminal Code, the threat of punishment in the customary crime of *Lokika Sanggraha* is no more than three months in prison and/or a fine of five hundred rupiah as a substitute for the customary punishment. However, if the judge considers that the substitute punishment is inadequate because the act committed is more severe than the threat of the punishment, the judge can impose a maximum sentence of 10 years in prison. On the other hand, if the criminal case is also regulated in the Criminal Code, then the threat of punishment will follow the provisions in force in the Criminal Code.

Therefore, the criminal threat only applies to individuals who live in customary areas and are under the auspices of customary institutions, which Furthermore, the parties involved in customary criminal acts are referred to as Swapraja subjects. The application of criminal threats to Swapraja subjects is adjusted to the type of customary criminal act committed, as regulated in Article 5 paragraph (3) letter b of Emergency Law No. 1 of 1951. This law provides a legal basis for enforcing criminal sanctions in the context of customary law for Swapraja subjects who violate these provisions.

Based on these provisions, it is possible to enforce criminal law provisions that are not yet regulated in national criminal law, but based on existing law are still considered criminal acts with the limitations that have been regulated. And also based on Article 5 paragraph (1) of Law Number 48 of 2009 concerning Judicial Power, it is regulated in " *Judges and Constitutional Judges are required to explore, follow, and understand the legal values and sense of justice that live in society* ". The meaning of this article is that judges, in carrying out their duties, must not only adhere to the Law but must also understand the social and cultural context that lives in society, which means they must explore the legal values that are pervasive and widespread in the midst of society and consider the sense of justice that lives in society. This aims to ensure that the decisions taken are not only in accordance with positive law but also reflect the justice felt by society.

The defendant in this case was charged with Article 359 of the Adhigama Book concerning *Lokika Sanggraha* which has not been regulated and has no equivalent as a written criminal regulation either in the Criminal Code or other national laws, however this regulation

still exists in the Balinese traditional community as a customary criminal act, so that the act of *Lokika Sanggraha* can be said to be a criminal act as regulated in Article 5 paragraph (3) letter b of Emergency Law Number 1 of 1951 concerning Temporary Measures to Organize the Unity of the Power Structure and Procedure of Civil Courts.

And on that basis, the Article that is the reference for the indictment in this case is the customary crime of *Lokika Sanggraha* and is included in the category of specific customary law violations and only exists in Bali, so that this crime can only be applied to those who are subject to Balinese customary law, and that Defendant I Dewa Gede Ardana and Ni Putu Dwik Supartini are Balinese and Hindu, so both of them must be subject to Balinese customary law.

In this case, the Panel of Judges is of the opinion that the Public Prosecutor's indictment has a legal basis and because the Public Prosecutor's indictment has a legal basis, the Legal Panel will then prove the elements of Article 359 of the Adhigama Book in the actions of the defendant who was charged with a single indictment as regulated in Article 359 of the Adhigama Book regarding *Lokika Sanggraha*, the elements of which are: Sexual relations that occur on the basis of mutual agreement, with a promise from the man to marry the woman, but the man then violates the promise or "breaks the promise".

Because all the elements related to Article 359 of the Adhigama Book have been fulfilled, the defendant must be declared legally and convincingly proven to have committed the crime of *Lokika Sanggraha* in accordance with the single charge submitted. And in trying this case, the Panel of Judges referred to the values and laws that still apply in Balinese traditional society, especially customary law, namely Article 359 of the Adhigama Book concerning *Lokika Sanggraha*, where the defendant's actions have deviated from the legal awareness and sense of justice in Balinese traditional society, therefore the defendant must be given a sanction by sentencing Defendant I Dewa Gede Ardana to imprisonment for 1 (one) month and 15 (fifteen) days by considering Article 359 of the Adhigama Book *in conjunction with* Article 5 paragraph (3) letter b of Emergency Law Number 1 of 1951 concerning Temporary Measures to Organize the Unity of the Power Structure and Procedures of Civil Courts, Law Number 48 of 2009 concerning Judicial Power, and Law Number 8 of 1981 concerning Criminal Procedure Law and other related laws and regulations. (Nungky Kusuma, 2023)

2. The application of customary criminal sanctions *Lokika Sanggraha* can be said to be fair and effective from the perspective of customary law and national law.

The application of customary criminal sanctions of *Lokika Sanggraha* can be said to be fair and effective from the perspective of customary law and national law if the sanctions are in line with the norms and values adopted by indigenous communities and remain in line with the principles of justice regulated in national law, so that they can provide substantial justice for all parties involved.

In customary law, criminal sanctions for violations of *Lokika Sanggraha* are often in the form of fines, coaching, or the implementation of certain rituals that aim to restore social relations and maintain balance in the community. These sanctions not only function as punishment for the perpetrators, but also as a means of education and behavioral improvement, and to restore harmony in society. This reflects the values of restorative justice upheld by indigenous peoples, where conflict resolution is carried out through deliberation and mutual agreement. And the effectiveness of the application of these customary criminal sanctions can

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be seen from the case of decision No.997/Pid.Sus/2019/PN.Dps showing that the customary criminal sanctions of *Lokika Sanggraha* are effective in maintaining customary values in Bali. By integrating customary legal sanctions with the formal judicial process, the community feels justice and the restoration of social harmony after violations of customary norms. This reflects the sustainability and relevance of customary law in the context of modern society in Bali.

On the other hand, in the decision of the sanctions received by the defendant, the sanctions are decided by the Court, but there are other sanctions received by the defendant, namely customary sanctions applied in the traditional village where the defendant lives, so to restore the disturbed balance, a village cleansing ceremony will be held by the local traditional community. Men who are considered to have polluted the traditional village will be subject to customary sanctions in the form of " *kasepekeng* " which means that he will not be spoken to by the villagers for a certain period of time until he apologizes to the village administrators.

However, challenges arise when these sanctions are not accommodated in the national legal system. The ambiguity in the application of *Lokika Sanggraha sanctions* in national law can lead to injustice, especially if the perpetrator does not receive sanctions commensurate with the violation committed. Research shows that there is an urgent need to integrate this customary crime into the national Criminal Code (KUHP) so that it can be regulated formally and provide a more comprehensive sense of justice.

Meanwhile, from a national legal perspective, the application of criminal sanctions for *Lokika Sanggraha* is still a controversial debate. Although there have been efforts to incorporate customary law into the national legal system, many aspects of this crime have not been regulated in detail in the Criminal Code. This situation creates a gap between applicable law and social conditions in society, where violations of *Lokika Sanggraha* are often considered serious violations of moral norms.

Lokika Sanggraha cases show that judges often have to balance customary and national law aspects in their deliberations. In some decisions, judges combine legal and non-legal considerations to impose sanctions aimed at providing justice to the injured party, especially the women who are victims in the case. However, inconsistency in the application of sanctions can reduce the effectiveness of the law and cause dissatisfaction among the community.

And the conclusion from the perspective of customary law and national law regarding criminal acts is that overall, the application of customary criminal sanctions *Lokika Sanggraha* is considered fair and effective in the context of customary law, but has difficulties when integrated with national law. In order to achieve broader justice, it is important for the national legal system to officially accommodate and regulate this customary crime, so that it can provide better protection for individuals and society. Legal reform that takes into account customary values and the needs of society is urgently needed to create a more harmonious and just legal system.

Conclusion

1. The application of customary criminal sanctions against *Lokika Sanggraha* in court decisions is possible as stated in Article 5 paragraph (3) letter b of Emergency Law Number 1 of 1951

and Law Number 48 of 2009 concerning Judicial Power which requires judges to understand the legal values that exist in society. And in the Court Decision shows the application of customary criminal sanctions *Lokika Sanggraha* in accordance with the elements regulated in Article 359 of the Adhigama Book.

2. In the application of customary criminal sanctions *Lokika Sanggraha* can be said to be fair from the perspective of customary law because it is in accordance with the values and norms of society and aims to restore balance. However, its integration with national law still encounters difficulties. And to achieve more comprehensive justice, it is important for national law to officially regulate customary crimes *Lokika Sanggraha* and other customary crimes so that it can provide better protection for individuals and indigenous communities.

Suggestion

1. Related to the integration between the customary criminal law of *Lokika Sanggraha* and the national criminal law system, efforts are needed to achieve better integration, by regulating the details of this customary crime in the Criminal Code so that its application becomes more consistent and provides a more comprehensive sense of justice. And judges need to pay more attention to social and cultural changes in the Balinese customary society and the values of justice that develop in the lives of these customary communities in processing and deciding these customary criminal cases, so that the decisions taken are in accordance with national legal principles and customary law.
2. And further research needs to be conducted on the implementation of customary criminal sanctions of *Lokika Sanggraha* consisting of obstacles and challenges to its integration into the national criminal law system so that customary criminal justice becomes more effective and provides a sense of justice. And the government also needs to further strengthen legal protection for victims of customary criminal acts of *Lokika Sanggraha*, especially women.

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