

Accountability of Cyber Actors for Disseminating SARA-Based Information under Law Number 19 of 2016 and the Criminal Code Study: Decision Number 73/Pid.Sus/2021/PN NGA

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ABSTRACT

Cybercrime utilizes the development of information technology to commit crimes, including the dissemination of racially charged information that can lead to social conflict and disruption of community stability. This research identifies legal gaps in the criminal liability of cyber offenders as well as challenges in collecting digital evidence. The lack of clear legal boundaries and various obstacles in law enforcement in the digital realm are the main focus. Through the normative juridical method, this research examines the law as a norm that applies in society based on the hierarchy of legislation and the harmony of legislation. The case example discussed is the phishing crime by Rizki Fahmi, the defendant of spreading SARA hatred. Firm and consistent law enforcement is needed to overcome cybercrime and its significant impact on victims and the wider community.

Keywords:

Cybercrime;
spreading SARA;
legal gap; phishing;
law enforcement

INTRODUCTION

Rapid advances in the field of information and communication technology have brought major changes to the pattern of community interaction. In a digital literacy activity, the Head of Informatics Application Division (Aptika) emphasized the importance of ethics in using digital media. One of the main principles that needs to be upheld is to avoid spreading content related to Ethnicity, Religion, Race and Intergroup (SARA) issues (Admindiskominfo 2023). Digital ethics is crucial in the midst of today's rapid flow of information. In the digital age, information distribution is very fast and reaches a wide audience through social media, websites and other online communication platforms.

The development of technology brings great benefits, but also presents significant challenges, especially regarding the spread of racially charged content. Such information not only has the potential to trigger horizontal conflicts between community groups, but can also damage social harmony, create polarization, and cause divisions that threaten the nation's social and cultural stability Indonesia has two main legal frameworks to regulate the dissemination of illegal information on the internet, namely Law No. 19/2016 on Electronic Information and Transactions (ITE) and the Criminal Code (KUHP). The ITE Law regulates the prohibition of dissemination of electronic information that violates legal norms, while the Criminal Code provides the basis for legal interpretation of such violations.

This research highlights Decision Number 73/Pid.Sus/2021/PN NGA as an example of the application of the law to the dissemination of information that violates laws and regulations. The research on Verdict Number 73/Pid.Sus/2021/PN NGA concerning the defendant Rizki Fahmi aims to analyze whether the punishment imposed for phishing and the dissemination of SARA-related content (ethnic, religious, racial, and inter-group issues) is appropriate and proportionate to the offense

committed. Given the significant harm caused by such crimes, the study highlights the importance of prevention and mitigation efforts in addressing these issues in the era of globalization. In handling cybercrime cases, there are a number of challenges that are often faced, namely:

- a. On the law enforcement aspect: Difficulties arise when cyber criminals use fake identities or hide behind anonymous accounts. Such situations demand the use of sophisticated digital forensic methods to trace the perpetrators digital footprints and ensure the accuracy and validity of evidence collected in the investigation process (Awaluddin, Amsori, and Mulyana 2024).
- b. Regulatory Gaps: The development of technology is rapid, even faster than the regulations to keep up with it. This causes a gap between the applicable law and practice in the field, of course, requiring regular regulatory adjustments so that there is no legal vacuum.
- c. Digital Evidence: The collection of digital evidence in cyber cases is very difficult and requires specialized technical expertise (Wahyudi 2012).

Phishing crimes motivated by the dissemination of SARA related content (ethnic, religious, racial, and inter-group issues) pose serious threats, including the risk of social conflict and societal instability. There are legal gaps and challenges in law enforcement, such as limited capacity of authorities and low public awareness. This research focuses on analyzing phishing and the spread of SARA content within the framework of Indonesian law, as well as examining Verdict Number 73/Pid.Sus/2021/PN Nga and the legal provisions applied to the perpetrator.

Based on the above problems, the formulation of legal problems consists of two, namely How are the rules related to the crime of spreading hatred according to Indonesian legislation and the application of penalties related to the crime of spreading hatred in Decision Number 73/Pid.Sus/2021/PN Nga. This study also aims to assess the extent to which the sentence imposed on the perpetrator in Decision Number 73/Pid.Sus/2021/PN Nga reflects compliance with the principles of justice and applicable legal provisions. This assessment includes an analysis of the judge's legal considerations, the relevance of the elements of the proven criminal offense, and the proportionality of the criminal sanctions imposed on the defendant.

METHOD

This study uses a normative legal approach or also called doctrinal legal research to analyze legal norms that regulate criminal acts of hate speech and criminal acts of fraud, especially those containing elements of SARA (ethnicity, religion, race, and inter-group) a concrete case example is in Decision Number 73/Pid.Sus/2021/PN Nga. concerning criminal acts of SARA. This approach focuses the study on legislation such as Law Number 19 of 2016 concerning Electronic Information and Transactions (ITE), the Criminal Code (KUHP), and other relevant legal provisions.

In this research, law is viewed as a system of norms that regulates social behavior, making the exploration of legal principles, doctrines, and rules essential to gain a comprehensive understanding of the application of sanctions in phishing cases and the dissemination of information containing SARA elements. This approach also examines the conformity of legal norms with the values of justice and legal order.

additionally, this research uses a qualitative descriptive analysis method in processing the data obtained. The descriptive approach aims to present data

systematically, structured, and in-depth to provide a comprehensive picture of the object of research. Meanwhile, the qualitative approach focuses on collecting and presenting data in the form of narratives or descriptions of words, not numbers. The data that has been collected is then classified and sorted based on its relevance to the research focus, then arranged coherently so that it can form a logical relationship pattern. Through this process, researchers try to draw conclusions that are analytical and in-depth on the legal issues studied.

RESULTS AND DISCUSSION

1. Phishing Crimes And The Spread Of Sensitive Information Involving Ethnicity, Religion, Race, And Intergroup Tensions

Phishing is a form of cybercrime that has become prevalent in today's digital era. Etymologically, the term "phishing" is derived from the word "fishing," with the substitution of the letter 'f' with 'ph,' which stands for "password harvesting." This terminology reflects the act of "fishing" for personal information through deceptive means. Phishing typically involves impersonating a trusted entity in electronic communications with the intention of tricking individuals into disclosing sensitive information, such as passwords, financial account numbers, or other confidential data (BERDIAWAN BENYAMIN, 2024).

Phishers use various techniques to deceive their victims, such as sending fake emails or creating fake websites that are identical to the official site. Phishing crimes often involve sending fake messages that mislead victims into providing sensitive information or clicking on fake website links designed to steal personal information. Victims who are unaware of the scam will provide their personal information, such as social media usernames and passwords, which are then misused by the perpetrator for various malicious purposes, such as identity theft or unauthorized access to the victim's account (CORNE 2019).

The spread of information containing SARA is one of the most dangerous forms of cybercrime because it can worsen relations between communities, trigger social conflicts, threaten state stability, cause social tension, discrimination, and even violence. SARA information usually contains content that triggers hatred and hostility towards individuals or groups based on SARA-related identities. The dissemination of information that contains discriminatory elements and creates hatred towards individuals or groups based on SARA is certainly contrary to the principles of equality and humanity. This action can trigger social conflict, worsen inter-ethnic or religious relations, and damage community harmony (Imaroh, Hamzani, and Aryani. 2023).

Phishing and the dissemination of content that is ethnically, religiously, racially, and intergroup sensitive are serious forms of cybercrime that cause diverse harms, both at the individual and societal level. The negative impacts include significant financial losses through fraudulent transactions and unauthorized access to banking information, identity theft resulting in the exploitation of personal credentials for illegal purposes, exacerbating social divisions through the circulation of inflammatory and discriminatory narratives, and severe reputational damage to personal integrity, professional standing, and social connections (Nurfitrianti, 2020).

a) Legal Provisions on Hate Speech Based on the Criminal Code (KUHP)

The Criminal Code (KUHP) provides specific legal provisions aimed at criminalizing the spread of hate speech that can disrupt public order and social

harmony. Article 156 of the Criminal Code stipulates that anyone who publicly expresses feelings of hostility, hatred, or insults against a section of the Indonesian population can be subject to a maximum imprisonment of four years or a fine. In addition, Article 157 paragraph (1) further criminalizes the act of broadcasting, displaying, or publicly displaying written or visual material containing expressions of hostility, hatred, or insults with the intention of reaching a wider audience. Such acts are punishable by a maximum imprisonment of two years and six months or a fine (Munawaroh 2024).

These provisions reflect the criminal law's commitment to maintaining national unity by addressing verbal and symbolic expressions that trigger division, discrimination, or hostility among its diverse population. However, the application of these articles has also sparked critical debate about the balance between maintaining public order and upholding freedom of expression in a democratic society.

b) Legal Framework for Hate Speech Regulation Based on the Electronic Information and Transactions Law (UU ITE)

Law Number 11 of 2008 concerning Electronic Information and Transactions (UU ITE) as amended by Law Number 19 of 2016, contains special provisions aimed at combating hate speech in the digital space. Article 28 paragraph (2) of the ITE Law prohibits anyone from intentionally and without the right to disseminate information intended to incite hatred or hostility towards individuals or groups based on ethnicity, religion, race, or class (SARA), (Renata Christha Auli. 2024).

Violations of this provision may be subject to criminal sanctions based on Article 45A paragraph (2) which carries a maximum sentence of six years in prison and/or a maximum fine of one billion rupiah. This legal norm emphasizes the importance of promoting harmony and social tolerance in a pluralistic society by criminalizing digital expressions that have the potential to divide society and cause social unrest.

c) Legal Provisions on Hate Speech in Indonesia's New Criminal Code (Law No. 1 of 2023)

The enactment of Law No. 1 of 2023 concerning the Indonesian Criminal Code introduces updated provisions related to hate speech, reflecting the state's commitment to protecting social cohesion in a diverse society. Article 242 criminalizes the public expression of hostility, hatred, or contempt toward specific groups or segments of the Indonesian population based on race, nationality, ethnicity, skin color, gender, or physical and mental disabilities. Offenders are subject to a maximum prison term of three years or a fine categorized as Level IV, amounting to IDR 200 million (Indonesia, 2023).

Furthermore, Article 243 paragraph (1) addresses the dissemination of such hostile expressions through information and communication technologies, especially when intended to reach a broad audience and when the content incites violence against individuals or property on the basis of ethnic, religious, racial, or intergroup identities (SARA). This offense is punishable by up to four years of imprisonment or a fine under the same penalty category.

The inclusion of these provisions within the new Criminal Code illustrates the Indonesian government's legal strategy to mitigate the societal risks posed by hate speech, particularly in the digital age. Phishing activities and the online circulation of SARA-related content not only cause financial harm to individuals but also threaten broader social and political stability. Therefore, it is imperative for governments and

law enforcement agencies worldwide to raise public awareness of these offenses and to adopt firm legal measures to prevent, investigate, and prosecute such crimes effectively (Rikwanto, 2020).

2. Implementation of Punishment for the Crime of Spreading Hate Speech in Decision Number 73/Pid.Sus/2021/PN Nga

In Decision No. 73/Pid.Sus/2021/PN Nga, the District Court of Ngawi found the defendant, Rizki Fahmi, legally and convincingly guilty of distributing digital content containing hate speech directed at individuals and specific community groups based on ethnic, religious, racial, and intergroup (SARA) backgrounds. The court ruled that the defendant's actions violated the provisions of Indonesia's Electronic Information and Transactions Law (ITE Law), particularly those prohibiting the dissemination of information that may incite hostility or hatred within society.

The panel of judges emphasized that the defendant's conduct not only contravened positive legal norms but also undermined the values of tolerance, pluralism, and peaceful coexistence in a multicultural society. Furthermore, the ruling highlighted that the dissemination of hate speech through digital platforms carries broad and rapid consequences, posing a serious threat to social stability and national cohesion.

a) Case Chronology

Table 1. Case Background in Decision No. 73/Pid.Sus/2021/PN Nga

Date	Description of Activities
Friday, 29 January 2021	- The defendant used a Redmi Note 7 mobile phone with number 081935433913 to create a phishing link through a free website (www.sp0m.com). He then distributed this phishing link to obtain Facebook usernames or email addresses and passwords from individuals who accessed the link. - At 13:00 Central Indonesia Time, the Facebook account "Ardi Alit" accessed the phishing link, allowing the defendant to gain login credentials: username: 085738511677 and password: santosa15.
Saturday, 30 January 2021	- The defendant changed the username to kone03@outlook.co.id , which was an email address he had created, and changed the password to kikiii351 .
Friday, 12 March 2021	- At 02:00 Central Indonesia Time, in his rented room located on Jalan Loji, Kampung Loji, Pulukan Village, Pekutatan District, Jembrana Regency, the defendant created a fake Facebook account under the name "Abdilah Pulukan Bali" using a Redmi Note 7 and the phone number 081935433913. The account used a profile picture of Abdul Majid Sadri, the defendant's paternal uncle. - The fake account was used to post a photo of the Melasti Ceremony (part of the Hindu Nyepi celebrations) with captions insulting the ritual, describing it as foolishness and opposing the celebration of Nyepi, while declaring himself a devout Muslim. He also wrote that Hindus in Bali should stop worshipping stones and statues. - After posting, the defendant took a screenshot and deleted the fake account to direct public anger towards Abdul Majid Sadri. - At 13:08 Central Indonesia Time, the screenshot was posted from the account "Ardi Alit" with a caption pretending to seek help in identifying the individual in the post, aiming to provoke the Hindu community in Bali.

Source: Decision No. 73/Pid.Sus/2021/PN Nga

b) Judicial Considerations in Decision No. 73/Pid.Sus/2021/PN Nga

In the case of Rizki Fahmi, as examined in District Court Decision No. 73/Pid.Sus/2021/PN Nga, the panel of judges based their ruling on a series of legal facts and findings that confirmed the defendant's criminal liability under Article 28 paragraph (2) in conjunction with Article 45A paragraph (2) of Law No. 19 of 2016 amending Law No. 11 of 2008 on Electronic Information and Transactions (ITE Law).

"Every Person" Element: The identity of the defendant was lawfully established and matched the requirements under Article 155 paragraph (1) of the Indonesian Criminal Procedure Code (KUHP). There was no error in persona, and the indictment was deemed accurate and legally valid.

"Intentionally" (Mens Rea): The defendant knowingly and deliberately committed the act with full awareness of its consequences, violating both objective legal norms and the rights of others (Mulyadi Sihombing 2024). The court found it legally proven that on Friday, March 12, 2021, at approximately 2:00 AM Central Indonesia Time, the defendant created a fake social media account under the alias "Abdillah Pulukan Bali," using a photograph belonging to witness Abdul Majid Sadri without consent. He then published hate speech targeting specific religious and cultural elements namely the Hindu religion, the Nyepi holiday, and the island of Bali. The content was subsequently distributed using another account, "Ardi Alit," which had been taken over through phishing methods.

In reaching its verdict, the court weighed both aggravating and mitigating factors:

- Aggravating Circumstances: The defendant's actions disrupted public order, incited social unrest, harmed the victim, and offended the broader Hindu community. Moreover, the defendant had a prior criminal record.
- Mitigating Circumstances: The defendant acknowledged his wrongdoing, expressed remorse, and was the primary breadwinner for his family.

Based on these considerations, the court found Rizki Fahmi guilty and sentenced him to three years of imprisonment and imposed a fine of IDR 100,000,000. In the event that the fine is not paid, it is to be substituted with three months of subsidiary imprisonment.

c) Juridical Analysis of Judicial Considerations in Decision No. 73/Pid.Sus/2021/PN Nga

The judicial reasoning in the case of Rizki Fahmi, as laid out in Decision No. 73/Pid.Sus/2021/PN Nga, reflects the application of substantive and procedural criminal law in a manner that upholds the principles of justice, legal certainty, and societal utility. The court found the defendant guilty of violating Article 28(2) in conjunction with Article 45A(2) of Law No. 19 of 2016, which amends Law No. 11 of 2008 on Electronic Information and Transactions (ITE Law). This provision prohibits the dissemination of information intended to incite hatred or hostility based on ethnic, religious, racial, or inter-group identity (SARA).

• Fulfillment of the Elements of the Offense

The court meticulously established that the constituent elements of the offense were satisfied:

"Every person": The defendant's identity was clearly verified and aligned with Article 155(1) of the Indonesian Criminal Procedure Code (KUHP), and there was no error in persona (Pakpahan, Manullang, and Nababan 2019).

"Intentionally and without lawful authority disseminating information aimed at inciting hatred or hostility": This element was proven by the defendant's creation of a fake account using another person's photo without consent, and the dissemination of hate speech targeting a particular religion (Hinduism), religious holiday (Nyepi), and region (Bali). The distribution of such content, conducted through an account acquired via phishing, demonstrated both mens rea (criminal intent) and actus reus (criminal act).

From a criminal law perspective, the court correctly applied both the subjective and objective elements required for a criminal conviction under the ITE Law.

- **Aggravating and Mitigating Circumstances The court weighed several relevant considerations:**

Aggravating factors included: disruption of public order, provocation of social instability, harm caused to the victim and the broader Hindu community, and the defendant's prior criminal record (recidivism). Mitigating factors included: the defendant's admission of guilt, expression of remorse, and status as the primary income earner in his family, this approach aligns with the principle of individualized sentencing, whereby penalties are determined with due regard for the offender's personal circumstances (Prof Sudarto, 2018).

Discussion

The case reflected in Decision Number 73/Pid.Sus/2021/PN Nga highlights critical challenges in addressing cybercrime involving phishing and the dissemination of hate speech related to ethnicity, religion, race, and intergroup tensions (SARA). The court's legal considerations were grounded in Indonesia's Electronic Information and Transactions Law (UU ITE), particularly Articles 28(2) and 45A(2), which prohibit the intentional spread of information that incites hatred or hostility toward protected groups.

The court correctly identified the essential elements of the offense, including the defendant's verified identity, the intentional creation and use of a fake social media account, and the dissemination of hateful content targeting specific religious and cultural communities. This factual and legal finding aligns with the objectives of the UU ITE to safeguard societal harmony and prevent digital platforms from being misused to propagate divisive and inflammatory messages.

While the case affirms the necessity of criminal sanctions as a deterrent to such harmful online behavior, the court also balanced aggravating factors—such as public order disruption and prior offenses—with mitigating circumstances, including the defendant's remorse and family responsibilities. This approach reflects the principle of individualized sentencing, ensuring that penalties are fair and proportionate to the offender's conduct and social context.

Moreover, the ruling underscores the ongoing tension in democratic societies between protecting freedom of expression and curbing hate speech. Criminalization remains an important tool to prevent social harm, but it must be carefully applied to avoid unduly restricting legitimate discourse, especially as digital communication evolves rapidly.

From a broader perspective, the case illustrates the need for a coordinated multi-sector response involving law enforcement, technology providers, government agencies, and civil society to effectively counter cyber-enabled hate crimes. Public education and digital literacy programs are vital complements to legal enforcement, empowering citizens to recognize phishing schemes and resist divisive content.

In conclusion, this decision contributes to the growing body of jurisprudence addressing the multifaceted nature of cybercrime in the digital era. It highlights the importance of integrating robust legal frameworks with preventative and educational strategies to protect both individual rights and social cohesion, thereby reinforcing Indonesia's commitment to a harmonious and pluralistic society.

CONCLUSION

This study concludes that the crime of hate speech spreading involving SARA elements through cyber methods such as phishing, as analyzed in Decision Number 73/Pid.Sus/2021/PN Nga, illustrates the growing complexity of digital offenses and their profound impact on social harmony. The data analysis shows that while Indonesian legal instruments particularly the ITE Law and the Criminal Code are effective in establishing criminal liability, enforcement remains challenged by rapid technological advances and limited public digital awareness. These findings provide valuable insight into how digital platforms can be exploited to incite intergroup hostility and contribute to the development of cybercrime theory by linking technological abuse with socio-legal consequences.

Culturally and socially, the study underscores the urgent need for stronger digital ethics education and law enforcement coordination to protect Indonesia's pluralistic values. Academically, it supports previous research calling for more integrative approaches to cyber law, combining doctrinal, technological, and sociological perspectives. However, the study is limited by its focus on a single case and the absence of empirical field data, indicating that future research should explore a broader range of case studies and incorporate interdisciplinary methods to deepen understanding of online hate speech and its prevention.

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