

Legal Certainty of Noodweer as an Excuse Justification for the Decision of the Blora District Court Number 109/PID/B/2015/PN/BLA

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ABSTRACT

Criminal law is the law that regulates violations and crimes. In addition to regulating the matter, criminal law also regulates criminal proceedings, one of which is the reason for criminal eradication. The reason for criminal offenses is divided into two, which called excuse and justification. The excuse justification is the reason that eliminates the unlawful nature of the act, so that the offender's nature can be denied. However, in Decision 109 / PID / B / 2015 / PN / BLA where the defendant was doing noodweer, the judge did not consider the general rules of punishment regarding noodweer. The problem is how the certainty of the noodweer as a excuse justification for the Blora District Court Decision number 109 / PID / B / 2015 / PN / BLA? Normative research methods are used to answer this problem. There are two approaches to assessing problems, namely the legislative approach and the case approach. The analytical technique applied to answer the above problems is through deductive analysis. From the results of the discussion it can be concluded that in the Decision the judge did not pay attention to the provisions of the noodweer properly. In the case there was a noodweer as a excuse justification for causing the removal of the nature of the conviction. So that the perpetrators cannot be subject to criminal sanctions.

Keywords: *legal certainty, noodweer, excuse justification*

1. INTRODUCTION

1.1. BACKGROUND

Indonesia is a legal state sovereign people and the form of a republic.[1] As a legal state, Indonesia must meet the statutory state criteria on generally, the legal state criteria are law placed in the organizing the state as a source of sovereignty that supreme. Law as a source of sovereignty the highest has a role that essential in people's lives agar create a sense of tranquillity, justice and security. Besides arranging on the subject it's the law also set about what man's deeds are forbidden or whatever it is.

Every individual has an interest differ between one with the other. With the existence of such different interests, law required his presence in order to be able set it up so that there was no conflict interest. Law governs on matters which one should be done and which things should not be done which his nature of force, binding and containing firm sanctions. Criminal law constitute one of the laws in effect in Indonesia. Criminal law constitutes part of the applicable law is one the state thoroughly.[2]

The governing law regarding crimes and offences on the public interest, whose deeds be threatened with punishment which constitutes a torment or suffering

is definition of criminal law put forward C.S.T Kansil [3].

Specifically criminal law has functions to protect the interests of law against the deeds threatened with sanctions, sanctions are criminal be sharper when compared with sanctions contained on the branch other laws. Thus overcoming evil deeds constitute the rules given criminal law.[4]

Written law is the main source from criminal law in Indonesia, besides unwritten law can also be source of criminal law in areas and for certain people. The Book of Acts-the Criminal Law (Criminal Code) law became the parent of criminal law regulations is positive. Criminal regulations contained in outside of the uncodified Criminal Code and be scattered in law or regulations from the central government or the area is also a source of law another written criminal.

Aside from arranging regarding crimes and offences, criminal law also governs proceedings criminal rationing referred to as inspiring. Meaning broadly from Is the process of giving or criminal rationing committed by judge, thus the system of indictment covering the entire provision of legislation-invitations governing how the law the criminal was enforced so that it was sentenced sanction against a person.[5]

Sudarto suggests that the indication must qualify two conditions. First terms. It's a criminal offense. This is a criminal offense. the aftermath of the principle of legality. In principle. The essential certainty is the formulation of the delicate. That nature must surely be in law-criminal ,what things are prohibited and things what is ordered should be able. known with certainty. Second terms are criminal liability, that maker able to take responsibility required for existence criminal liability.

However, criminal code is the master of regulation positive criminal law also governs regarding the thing that can abolish criminals referred to as reasons criminal eraser. Reason that allow when one's commit a deed that has fulfilled in delicate formulation will but not convicts constitute a definition of reason criminal eraser. Reason that make one's incapable of convict and cannot be accounted for M.v.T. puts two things on the grounds a forgiving that is of the unable accounted for it lies in the self that person, and the excuse justification unaccountable located outside that person.

Regarding excuse justification is the reason where deeds fight the law of the maker is abolished, though delicate formulation in the law has been fulfilled. In the Criminal Code there is Article 48 (noodtoestand) Article 49 verse (1) (noodweer), Article 50 (rule statute), and Article 51 verse (1) (command of office) which included as Just the reason.

The term noodweer contained on the Criminal Code which is set in Article 49 verse (1), when see in it then his deeds against his law was abolished. Someone. that retained his rights could not expected of a citizen who take it for what is done against the law directed against himself, when the country with tools the gear may not be appropriate time to protect the interests of law and the man who was attacked. And so noodweer is an excuse justification. This forced defense is of a nature remove the nature of deeds against the law.

In the noodweer there are two things that principal that is the presence of an attack and exists a plea that needs to be held against the attack. With the existence of noodweer as an excuse justification, then the nature can be convict a person who committed a defense forced to fall.

But in practice, there is a verdict which should be categorizable as a noodweer, however judge sentenced him to 2 years against the defendant. The verdict in question namely the Blora District Court ruling Number 109/PID/B/[2015/PN/BLA](#). Chronology brief contained in the verdict such should be the following, "that at the time the defendant was in the room home of the localization complex of Sumberagung Kel. Karangboyo Kec. Cepu Kabupaten Blora is listening to music on Hand Phone, and about 16:30 p.m. victim go into the room and be jealous of in defendant texted an with guest

(male) that unknown identity, then the victim seized HP from behind the defendant's hand, while indignant, slammed the HP, slapped hair, slapping cheeks, kicking stomach so that the defendant was knocked over the mattress, kicking ass, next victim draw the defendant's left hand by position standing face to face with the victim, next victim strangling defendant's neck by using the left hand, next hand left defendant takes a knife that was on the fridge, next victim attempting to snatch knife from the defendant's hand so occur inter-pull pulling stalks and ends the knife hits the belly next door right side navel victim, experience scratches, and the defendant's next thrust again the knife in the direction the victim's left chest with use both hands as hard as one-time power resulting open wound to the chest next door upper left length approximately 3 cm deep approximately 4 cm, which makes the victim die on the way to To the hospital. Based on the short chronology of the Verdict District Court Blora Number 109/PID/B/[2015/PN/BLA](#), it can be said that deeds committed by the defendant It's a noodweer, when it comes to it the defendant did not do so could only the defendant killed by strangling by the victim in a state drunkenness from alcoholic beverages, plus again the defendant constitutes a women whose power is not as strong and incapable of fighting off the victim constitute a man. Based on the reason, there was a research title this is "Legal Certainty of Noodweer As Excuse Justification for the Decision of the Blora District Court Number 109/PID/B/[2015/PN/BLA](#)"

1.2. FORMULATION OF THE PROBLEM

Based on the background description above, the formulation of the problem in this study is how legal certainty of noodweer as excuse justification for the decision of the Blora District Court Number 109/PID/ B/2015/PN/BLA?

1.3. RESEARCH METHODS

Normative methods are used to assess the certainty of noodweer as a excuse justification for torture that results in death. There are two approaches to assessing problems, namely the statute approach (satute approach) and the case approach. The law approach is carried out by examining all laws and regulations relating to the legal issues being addressed.[6] The legal approach in this study refers to the application of the criminal code used by judges in cases of mistreatment that result in death. The case approach is carried out by examining cases related to the issues at hand that have become court decisions that have permanent legal force. An approach that

understands the certainty of a *noodweer* as an excuse justification for Blera District Court Decision Number 109 / PID / B / 2015 / PN / BLA. The need for material facts because the actions contained in the Decision are acts as a *noodweer*.

The data source used is secondary data consisting of primary legal material in the form of laws and court decisions, and secondary legal material in the form of book literature and research results. The laws and regulations used include those relating to criminal arrangements regarding forced defense, namely the 1945 Constitution, the Criminal Code and the Criminal Procedure Code.

Data analysis techniques in this study use deductive analysis techniques. The use of deduction method stems from the filing of a major premise. Then a minor premise is submitted, from the two premises it is then drawn a conclusion or conclusion. But in legal argument, legal syllogism is not as simple as traditional syllogism.[7]

2. DISSCUSION

Criminalization in criminal law in Indonesia is a process against a person to impose sanctions or punishment for an act that has been committed either a crime or a violation. Punishment is another word for punishment. Sudarto said the basic word for punishment was "the law", which was later interpreted as "establishing the law", or "deciding about the sentence". The state has the right and power to prosecute and take action in an effort to maintain and carry out order, and protect against various legal interests.[8]

According to Sudarto, criminalization must meet two conditions, the first requirement for criminalization, namely crime, as a result of the principle of legality. In the principle of certainty what is important is the formulation of the offense. It must be a trait that must be in criminal law, regarding what is prohibited or what is ordered therein must be known with certainty.

Makers are able to take responsibility is the second requirement in punishment. A person who cannot be held responsible cannot be held accountable for his actions. Someone said to be unable to take responsibility is not formulated in the Criminal Code. The definition of responsible ability can be seen in the Dutch criminal law literature. Such a psychic state is the meaning of the ability to be responsible, a psychic state as well as justification of an attempt at criminal action is applied, which is seen from the point of view of the person or the general angle, it was stated by Simons.

Criminal law also regulates the reasons for criminal offenses contained in Book I Chapter III. Reasons that allow a person not to be convicted even though his actions fulfill the offense formulation are definitions of reasons for criminal offenses. *M.v.T.*

mention there are two reasons, namely forgiving reasons and excuse justification.

Reasons relating to the person of the maker, in the sense that this person cannot be blamed (according to the law) in other words he is not guilty or cannot be accounted for is an understanding of the reasons for forgiveness, even though his actions are unlawful acts. While the reasons for the nature of an unlawful act are abolished even though the act complies with the offense formulation regulated by law is the understanding of the excuse justification.

In bringing a person to justice, a good, right and fair legal process is carried out which is the understanding of the criminal justice system or due process of law. To ensure that every individual is not punished unjustly is a form of business protection from a fair trial process.[9]

Regulations that guarantee legal certainty in relations between people are desired in social life, not only justice is created by law and its interests are served by law. The law must meet values divided into three basic legal values. Justice, usefulness and certainty are the three basic values. The basic value of philosophical justice, the basic value of sociological usefulness, the basic value of judicial certainty is the basis of validity of the three basic values.[10]

Certainty for law is a condition that has certainly law is the meaning of the existence of the principle of certainty. Protection for justice seekers (justifiable) against the arbitrariness of an act is a protection provided for the existence of the principle of legal certainty. Thus, in certain circumstances what is expected by someone will be obtained.[11]

It can be said that a person does not know what to do without legal certainty, which then creates uncertainty, and then chaos arises because of uncertainty in a legal system. A clear law enforcement is a designation of legal certainty, conditions that are subjective can not affect the implementation of a permanent and consistent.[12]

Case that occurred in Blera District Court Decision Number 109/Pid.b/2015/Pn.Bla, the defendant was charged with *subsidaire*, *primaire* indictment was charged under Article 338 of the Criminal Code. The subsidiary charges are charged with Article 351 paragraph (3) of the Indonesian Criminal Code Jo. Article 359 of the Criminal Code.

The defendant in this case, a woman named Herning Kurniawati alias Irma binti Supardi, occurred on Tuesday 21 July 2015 at 16.30 WIB, which occurred in the room of the Sumberagung complex house, Karangboyo sub-district, Cepu sub-district, Blera regency, the defendant contracted together the victim named Marjono.

The defendant with the victim is a lover who has been married in 2013 with a plan that the defendant will officially marry the victim in 2015, the

defendant has been at home with the victim since January 2015. The defendant and the victim manage a karaoke house in Sumberagung, Cepu District, Blora Regency.

At the beginning of the incident, the defendant drank alcoholic drinks with one guest, two subordinates, and the victim of the accused being managed, then the defendant entered the room and in the room was playing cellphone listening to music, then shortly the victim approached the defendant in a state drunk broke the door and snatched the cellphone of the defendant's hands and slammed it down, the victim did so because the defendant texted the guest with an unknown (male) guest.

Then there was a fight of the mouth, the defendant also finished drinking alcohol so that both of them were easily emotional, the victim grabbed her hair and slapped her cheek and kicked the stomach of the defendant until the defendant's body fell down, continued the victim kicked the defendant's ass many times then the defendant's hand was pulled by the victim to stand before the victim, and the victim choked the defendant's neck using his left hand, at that time the defendant did not take the fight, because the incident was very fast and in a state of alcoholic intoxication, withstand the pain the defendant tried to release the victim's strangulation, reflexively took the knife that was near the defendant, the knife above the refrigerator in the room is usually used to cut fruit from the refrigerator, the defendant's purpose is to reflexively take a knife to fight so that the defendant can defend himself from the attack of the victim who was strangling the defendant's neck, because if he did not defend himself then he would become a victim of the violence.

Seeing the defendant holding a knife, the victim immediately seized and pulled each other to accidentally hit the victim's limbs, remembering the victim was hit by a knife 1 (one) time on the victim's left chest, after stabbing the victim once on the victim's left chest, his reaction was the victim did was to let go of the strangulation of his left hand around the defendant and the knife held by the defendant fell because of the tug of war. Then the victim staggered out of the room while grumbling and cursing the defendant because he was still carried by liquor and the victim fell outside the room. After the defendant learned of the victim's fall, the defendant immediately tried to help the victim and the defendant summoned the witnesses present in the trial to help lift the victim's body but was not strong so he waited for help from his family. Then the victim was taken to Cepu Hospital, but the victim died on his way.

The judge decided that the defendant had violated Article 351 paragraph (3) of the Criminal Code with imprisonment for 2 years, with the Judge's consideration that the defendant who was still able

to protect himself before the next attack from the victim by means of the defendant could shout for help during the attack first from the victim or at that time the defendant could run out of the room when the door was open.

Persecution in the Big Indonesian Dictionary is arbitrary treatment (torture, oppression, and so on). Regarding abuses in Article 351 of the Criminal Code the elements are as follows:

1. paragraph (1), the subject of a criminal act is a person, the act of mistreatment does not result in serious injury or death
2. paragraph (2), the subject of a criminal act is a person, his actions are torture which results in serious injury
3. paragraph (3), the subject of a criminal act is a person, his actions are persecution resulting in death
4. paragraph (4), the subject of a criminal act is a person, the act of mistreatment is done intentionally to damage health
5. paragraph (5), the subject is a person, for an attempt to carry out a criminal act of mistreatment is not convicted

The elements in the persecution are as follows:[13]

1. Deliberation

The subjective element is the element of intent. Deliberation as an intention is the understanding of the element of intent in persecution. It should be noted that intentionality can be interpreted as intentional with the possibility of being conscious, but the consequences are limited by intent. Thus intentions as intentions, intentions as possibilities, and intentions as certainty are only possible for the consequences. While his own actions must be the goal of the perpetrator. Thus the act must be an action that is truly intended by the culprit as an action intended or intended by the perpetrator.

2. The Act

The objective element is the element of action. Positive activity is the purpose of the action, a member of the body that humans use for activity.

The Judge in this Decision did not consider the general rules of punishment contained in the Criminal Code regarding *noodweer* in Article 49 paragraph (1) of the Criminal Code.

A person who for himself, for others, the honor of decency, or objects that belong to himself or someone else commits an act of forced coercion, then is not convicted according to this article of coercion. In defense there are two main things:

1. there is an attack, the conditions of the attack must be fulfilled namely instantaneous, threatening,

illegal, intentionally aimed at the body, courtesy and property.

2. there is a defense that needs to be made against the attack, the condition is that the defense must and must be done, the defense must involve the interests mentioned in the law namely attacks on the body, courtesy, and property belonging to themselves or others.

Against attacks not against the law it is not possible to have forced defense. Forced defense is also not possible to be done against forced defense. In terms of choosing the path to do this self-defense act there is what is called subsidiarity, that is, it must be justified by the circumstances in the action, the tool or the way it is doing.

Noodweer is a excuse justification, thus the unlawful nature of the law falls, and the nature of the conviction falls. Basically the defendant committed a forced act of noodweer, his actions had fulfilled the elements stipulated in the Article of noodweer. If you see two main points in the noodweer that Sudarto put forward. The first was an attack, that it was clear that the defendant was strangled as an attack aimed at the body of the defendant. Second, there is a defense that needs to be made against the attack, that it is clear that if the defendant does not make a defense then the defendant may become a victim in the violence.

If the Judge in his judgment states that the defendant who at the time of the incident was still able to protect himself before the next attack from the victim by means of the defendant could shout for help during the victim's first attack or at that time the defendant could run out of the room when the door was in a state open. That the defendant also did not know and did not expect the victim to strangle the defendant, and at the time of strangulation it was also not possible for the defendant to shout. The attack carried out by the victim against the defendant was pulling the hair, slapping the cheek, kicking the defendant's stomach until the defendant's body fell, kicking the defendant's butt repeatedly, then the defendant's hand was pulled by the victim to stand in front of the victim, and the victim choked the defendant's neck using his left hand.

The defendant in his statement also stated reflexively took a knife to fight so that the defendant could defend himself from the attack of the victim who was strangling the defendant's neck, the defendant took a knife that was on the refrigerator which was used to cut fruit because only the knife was the closest and could be used by the defendant to defend oneself from an attack that is being experienced immediately, if fighting with bare hands is not impossible it will make the victim more angry because the victim is in a state of drunkenness, and results in the defendant's life being threatened even

more. Even the victim who saw the defendant taking the knife wanted to grab the knife from the defendant's hands, this shows that if the victim managed to grab the knife from the defendant's hands the defendant could be killed, the attack carried out by the victim against the defendant was really aimed at the defendant and there was the defense needs to be done by the defendant, because if they don't defend themselves they will become victims of the violence.

Regarding the attack carried out by the victim against the defendant it was necessary to hold a defense that psychologist Nancy Glass from the Johns Hopkins University School of Nursing Professor Association suggested that strangulation could trigger death. In his 2008 Journal of Emergency Medicine study, a person choking from strangulation had a seven-fold risk of death.[14]

Whereas in the Decision, the Judge did not pay attention to the rules of punishment regarding forced defense, there was legal uncertainty and justice for the defendant. Legal certainty is a definite state, provision or determination. The law must be absolutely certain and fair. Legal certainty is important in criminal law enforcement, because without legal certainty in criminal law enforcement people do not know what to do and ultimately arise uncertainty, which then will cause violence due to uncertainty.[15]

The basis for the formation of a legal rule contained legal principles. It can be interpreted that the heart of the rule of law is the principle of law, the principle of law requires its existence to understand a rule of law. The principle of legal certainty is a principle that is primarily for the creation of a clarity in the formation of the rule of law. Gustav Radbruch who put forward the principle of certainty. Radbruch argues that there are three basic values in law, namely justice (*gerechtigheit*), expediency (*zweckmassigkeit*), and legal certainty (*rechtssicherheit*). Thus what was stated by Gustav Radbruch that for the creation of the rule of law with clarity in its formation is strongly influenced by this principle of certainty.

Principles for judges to achieve the value of certainty there are three approaches in judging concrete matters:

1. Legalistic approach
2. Interpretive approach
3. Anthropological approach

Legal certainty has one aspect in it, namely law enforcement. The important role of law enforcement officers cannot be left unnoticed. Law enforcement officers have their own main duties and functions. So that when there is inequality in practicing the law inside and outside the court, when implementing the

law there needs to be synergy. The legal order, both vertically and horizontally, is directly influenced by the implementation of the law based on its rules. Thus, against violators or victims there is a guarantee of vertical certainty provided by law enforcement officials who have the duty and authority. Whereas horizontally, a set of laws that compromise the law together based on the main tasks and functions of implementing the norm properly is a good reflection of law. In this case the community as the target of the norm, there are no imbalances with law enforcement officers in implementing written law.[16]

Regarding what is prohibited or permitted by law, and regarding rights and obligations is the certainty of legal certainty.[17] Apeldoorn put forward two aspects of legal certainty, namely:

1. In terms of the concrete law can be determined, what are the laws in special cases before starting a case for those who seek justice, predictability (the possibility of predicting) stated by Roscoe Pund. Algra also said that the judge's decision can be predicted beforehand is an important aspect of legal certainty.

2. Legal security is legal certainty, this is a protection for the judge's personalism. In written regulations, legal certainty is more value than unwritten regulations.

Bearing in mind that criminal law in Indonesia is still in the classical stream, and the purpose of criminal law in the classical stream is to guarantee legal certainty. Legal certainty is the essence of the principle of legality, especially in Article 28D paragraph (1) of the 1945 Constitution which states "Every person has the right to recognition, guarantee, protection, and legal certainty that is fair and equal treatment before the law".

It is clear that in the Blora District Court Decision Number 109 / Pid.b / 2015 / Pn.Bla did not provide justice for the defendant. Actually the concept of justice is very difficult to find benchmarks because it is fair for one party not necessarily fair for the other party. The word justice comes from the word fair, which means it can be accepted objectively.

Containing the principle that people who want to develop their interests are independent and rational people, for them to enter the assembly to get an equal position at the beginning of it becomes a fundamental condition is the definition of justice put forward by John Rawls.[18] Social justice for all Indonesian people, is the value of justice that must be realized in the shared life contained in Pancasila as the basis of the Indonesian State. In law enforcement, justice is expected to be fulfilled. Fair or unfair law is a benchmark of law as a value of justice. The basis of law is the value of

justice. Normative and constitutive for law is the nature of justice. A positive law with dignity is based on justice.[19]

Gustav Radbruch put forward the normative and constitutive for law which is the nature of justice, normative because the positive law is the origin of justice. Constitutional because the absolute element for law is justice, a rule cannot be made law without justice.

What was done by the defendant in that case was a forced defense that had fulfilled the elements in Article 49 paragraph (1) of the Criminal Code, where the defendant committed the act because he wanted to defend the attack directed at his body. However, the Judge decided that the defendant had violated Article 351 paragraph (3) of the Criminal Code with imprisonment for 2 years, without considering the general rules of punishment regarding noodweer.

3. CONCLUSION

In the case of Blora District Court Decision Number 109 / Pid.b / 2015 / Pn.Bla Judge not pay attention to the general rules of punishment, which are noodweer as a excuse justification for what the defendant did in the case it is a noodweer. The defendant should not could be convicted of noodweer as an excuse justification results in the eradication of the nature of the act and the defendant cannot be subject to criminal sanctions. Thus, that noodweer as a excuse justification for the case there is uncertainty regarding the general rules of punishment.

REFERENCES

- [1] Indonesia, *Undang-Undang Dasar Republik Indonesia 1945*, Pasal 1 ayat (1), (2), dan (3).
- [2] Moeljatno. *Asas-Asas Hukum Pidana Edisi Revisi*. (Jakarta: Rineka Cipta, 2008).
- [3] Kasil, C.S.T. *Pengantar Ilmu Hukum dan Tata Hukum Indonesia*. (Jakarta: Balai Pustaka, 1989).
- [4] Sudarto. *Hukum Pidana I Edisi Revisi*. Cetakan ke-3. (Semarang: Yayasan Sudarto, 2009).
- [5] Arief, Barda Nawawi. *Bunga Rampai Kebijakan Hukum Pidana*. (Bandung: Citra Aditya Bakti, 2005).
- [6] Marzuki, Peter Mahmud. *Penelitian Hukum Edisi Revisi*. (Jakarta: Kencana, 2005).
- [7] Sunggono, Bambang. *Metode Penelitian Hukum*. Cetakan ke-6. (Jakarta: Raja Grafindo Persada, 2008).

- [8] Muladi and Barda Nawawi Arief. *Teori-teori dan Kebijakan Pidana*. Cetakan ke-2. (Bandung: Alumni, 1992).
- [9] Muladi. *Kapita Selekta Sistem Peradilan Pidana*. (Semarang: UNDIP, 1995).
- [10] Rahardjo, Satjipto. *Ilmu Hukum*. Cetakan ke-7. (Bandung: Citra Aditya Bakti, 2012).
- [11] Mertokusumo, Sudikno. *Bab-Bab Tentang Penemuan Hukum*. (Bandung: Citra Aditya Bakti, 1993).
- [12] Julyano, Mario. and Aditya Yuli Sulistyawan. "Jurnal Credipo". *Pemahaman Terhadap Asas Kepastian Hukum Melalui Konstruksi Penalaran Positivisme Hukum*. Vol. 1, No. 1 / 2019.
- [13] Tongat. *Hukum Pidana Materill: Tinjauan Atas Tindak Pidana Terhadap Subjek Hukum dalam KUHP*. (Jakarta: Djembatan, 2003).
- [14] Lutfi Dwi Puji Astuti. "Jangan Biarkan Mereka Mencekik Leher Anda". <https://www.viva.co.id/arsip/134393-jangan-biarkan-mereka-mencekik-leher-anda>.
- [15] Rato, Dominikus. *Filsafat Hukum Mencari, Menemukan dan Memahami Hukum*. (Yogyakarta: Laksbang Pressindo, 2010).
- [16] Sagama, Suwardi. "Jurnal Pemikiran Hukum Islam". *Analisis Konsep Keadilan, Kepastian Hukum dan Kemanfaatan Dalam Pengelolaan Lingkungan*. Vol. 15, No. 1 / 2016.
- [17] Rumokoy, Donald Albert dan Frans Maramis. *Pengantar Ilmu Hukum*. (Jakarta: Rajawali Pers, 2014).
- [18] Priyatno, Dwidja. dan M. Rendi Aridhayandi. "Jurnal Mimbar Justitia". *Resensi Buku (Book Review) Satjipto Rahardjo, Ilmu Hukum. Bandung: PT. Citra Aditya, 2014*. Vol. 2, No. 2 / 2016.
- [19] Mangesti, Yovita A. dan Bernard L. Tanya. *Moralitas Hukum*. (Yogyakarta: Genta Publishing, 2014).