

## JURIDICAL ANALYSIS OF THE CRIME OF MALTREATMENT RESULTING IN SERIOUS INJURY

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Received 20 Sept 2023 • Revised 25 Oct 2023 • Accepted 29 Nov 2023

### Abstract

Persecution is a crime committed by intentionally damaging the health of another person resulting in injury or pain to a person's body, this persecution is also usually carried out because of a grudge or feeling humiliated by others persecution. the problem of persecution and the Judges' Legal Considerations in imposing crimes against perpetrators of persecution in the Manokwari District Court Decision No. 149/Pid.B.2021.PN.MNK. The purpose of this research is to find out the provisions referred to in the crime of maltreatment of serious injury and to find out the application of criminal sanctions against victims of maltreatment causing serious injury with case number 149/Pid.B.2021.PN.MNK). The method of analysis and the data obtained are analyzed qualitatively, namely the analysis carried out by understanding and assembling legal materials related to the problems that have been collected descriptively so that an overview of the problem under study can be obtained, then the legal material is presented systematically and then legal interpretation is carried out. The result is the application of the law in case number 149 / Pid.B.2021. PN. MNK in, namely: All elements of the criminal offense of persecution committed by the defendant have been fulfilled in the trial, but in this case the provision of charges by the Panel of Judges in determining the article given is not in accordance with what has been experienced and felt by the victim and the Judge in this case should also in giving a decision must also consider several rights, one of which is the mental psychological health of the victim.

**Keywords:** maltreatment, criminal offense, juridical

## INTRODUCTION

Indonesia is a country that upholds values in social life, one of which is harmony. Harmony is a condition and process that creates and maintains various modes of interaction between autonomous units. Harmony embodies mutual acceptance, mutual trust, mutual respect and mutual appreciation, and is an attitude of understanding and unity (Lubis, 2005).

Harmony is also defined as a common life characterized by a harmonious and peaceful atmosphere. Living in harmony means there is no conflict, but heart to heart, one thought, and consistent action, so as to achieve mutual prosperity. Today's social life still does not apply the values of harmony, resulting in incessant crime in social life. The most prominent crime is the crime against "people" (Ismail, 2014).

Crimes against "people" in Criminal Code 351 include the following: honor (pengihaan), disclosing secrets, freedom or personal independence, life, body or body, property or wealth. Experts generally combine these matters into "crimes against the soul and body", which in the KHUP are regulated systematically as follows: crimes against the life of a person are listed in Chapter XIX, maltreatment in Chapter XX, and causing the death or injury of a person by mistake or negligence in Chapter XXI (Marpaung, 2002).

Article 351 of the Penal Code. Maltreatment shall be punished with imprisonment for a term not exceeding two years and next month or a fine not exceeding four thousand five hundred rupiahs. If the act causes serious injury, the offender shall be punished by a maximum imprisonment of five years. If it results in death, he shall be punished by a maximum imprisonment of seven years. With persecution, citizens are equalized so that their rights as a citizen are not violated, and sanctions are imposed on a person who violates crimes to violations into three important parts contained in the Criminal Code (Chazawi, Criminal Law Lessons Part 1: Criminal Stelsel, Criminal Acts, Theories of Punishment, and the Limits of the Applicability of Criminal Law, 2007).

A criminal act is a juridical definition, where a criminal act is defined as an act committed by a human being, due to his/her mistake that results in the law being subject to criminal sanctions. Criminal action actually comes from the Dutch language, namely strafbaarfeit, when interpreted it contains 2 (two) meanings of the words feit and strafbaaar. Feit has the meaning of a fact while strafbaaar has the meaning of being punished, when combined it means a fact that can be punished, when combined it means a fact that can be punished. Strafbaaar in the dictionary of criminal law is sometimes often referred to as delict or delictum, delict which means that an act that can be punished for committing an offense. Some legal experts formulate strafbaarfeit as follows (Sudarsono, 2007):

According to P.A.F Lamintang, strafbaarfeit is an act of doing or not doing something that has an element of guilt as a prohibited act and is threatened with criminal punishment, where the imposition of punishment on the perpetrator is for the sake of creating legal order and ensuring the public interest (Chazawi, Criminal Law Lesson 1, 2001).

According to Simons, strafbaarfeit is "an action that can be punished if there is a violation of the law, which has been carried out intentionally or unintentionally by a person who can be held accountable for actions contrary to the law (Lamintang, 2014).

The reason why the "strafbaar feit" must be formulated as above is because it has the following reasons:

For the existence of a "strafbaarfeit" it is required that there is an act that is prohibited or required by law, where the violation of such prohibition or obligation has been declared as a punishable act (Lamintang, Basics of Indonesian Criminal Law, 2011).

- a. In order for such an act to be punishable, it must fulfill all the elements of the offense as formulated by law.
- b. Every "strafbaar feit" as every violation of a prohibition or obligation under the law, is essentially an unlawful act or an "onrechtmatige handling".

According to E. Utrecht, strafbaarfeit is an act (positive handelen or doen) or criminal event or in English it is called a delict, where this act is due to negligence (natalen-negative). According to Moeljatno, a strafbaarfeit or criminal act is an act that is prohibited by a rule of law, and can be punished and accompanied by criminal threats if someone commits the prohibition.

## RESEARCH METHOD

The research method uses a type of normative legal research, where normative legal research is a scientific research procedure to find truth based on scientific logic viewed from the normative side (Efendi & Ibrahim, 2018). Data Source Primary legal materials are legal materials consisting of laws sorted by hierarchy. Primary legal sources related to the subject matter of the research include (Suteki & Taufani, 2018). Secondary legal materials are legal materials consisting of textbooks written by

influential jurists (deherseende leer), legal journals, scholars' opinions, legal cases, jurisprudence, and recent symposium results related to the problems in this research. Tertiary legal materials are legal materials that provide guidance or explanation of primary legal materials and secondary legal materials, such as the General Indonesian Dictionary, Legal Dictionary, Encyclopedia, newspapers, internet and others.

In library research, the researcher tries to get and read documents related to the problem under study to find concepts, theories, opinions or findings related to the subject matter. Field studies are a way to get primary data. In this case the author uses data collection techniques by conducting interviews, namely going directly to the relevant sources and conducting interviews.

The data analysis used is qualitative analysis, namely analyzing data based on the level of relevance to the problem being studied through data analyzed based on the theories used and doctrines contained in the Criminal Code, Criminal Procedure Code related to the crime of assault.

## RESULTS AND DISCUSSION

The definition of maltreatment as previously discussed by the author is that maltreatment in the Criminal Code is called a crime against the body, while experts formulate maltreatment as an act with intent to harm someone with pain felt in the body such as getting injuries throughout the body. As for the forms or types of crimes against the body or maltreatment, based on the element of guilt, crimes against the body consist of 2 (two) forms, namely:

- a. Crimes against the body committed with deliberate intent, which are qualified as maltreatment, are contained in Chapter XX of Book II which includes :
  1. Ordinary maltreatment as set out in Article 351 of the Penal Code
  2. Ordinary maltreatment as set out in Article 352 of the Penal Code
  3. Aggravated maltreatment as set out in Article 353 of the Penal Code
  4. Serious maltreatment as set out in article 354 of the Penal Code.
  5. Aggravated maltreatment as set out in Article 355 of the Penal Code.
  6. Maltreatment of a person with certain qualifications as set out in Article 356 of the Penal Code
- b. Crimes against the body due to negligence are contained in article 360 of Chapter XXI of the Penal Code, which is known as the qualification for negligently causing injury.

The criminal act of persecution consists of 2 (two) types, but there are only 5 (five) types and elements of persecution which the author will describe one by one from those mentioned above as follows:

1. Maltreatment may be subject to Article 351 of the Criminal Code  
Ordinary maltreatment is defined as an event that causes pain or an obstruction to routine work or a disturbance of the mind that does not last longer than four weeks, the pain can be expected to heal and there is no danger of death.

Ordinary maltreatment according to Article 351 of the Indonesian Penal Code is defined as follows:

1. Maltreatment shall be punished by a maximum imprisonment of two years and eight months or a maximum fine of three hundred Rupiahs.
2. If the fact results in a serious physical injury, the offender shall be punished by a maximum imprisonment of five years.
3. If the act results in death, the offender shall be punished by a maximum imprisonment of seven years.
4. With maltreatment shall be equated intentional damage to health.
5. Attempt to commit this crime shall not be punished.

The elements of ordinary maltreatment, namely:

- a) The element of intent
- b) Element of conduct
- c) The element of the consequences of the act (the seven), namely :
  - 1) Pain
  - 2) Sores on the body

The element of effect which is the sole purpose of Article 351 paragraph 2, namely ordinary maltreatment resulting in serious injury, is actually the same as the element in Article 351 paragraph 1, but the effect is different where the element of effect is serious injury as regulated in Article 90 of the Criminal Code, whereas if the injury is a minor injury and is not related to the injury in Article 90 of the Criminal Code then the injury is a minor injury, Furthermore, in Article 351 paragraph 3 maltreatment causing death where the element of effect, the effect in this article is death, where this death is not the result of death committed intentionally, it is no longer included in Article 351 paragraph 3 but is included in Article 338 of the Criminal Code on the crime of murder. In Article 351 paragraph 4, persecution in

the form of intentionally damaging health, basically the definition of persecution is that the person wants to do the act and knows that the act he is doing will cause damage to health:  
For example, giving murus medicine to someone who is sick with diarrhea, so that because of the administration of the drug the person who is diarrhea becomes worse diarrhea.

### **Simple offences against physical integrity Article 352 of the PC**

Ordinary maltreatment is an event that does not result in illness or in the inability to perform an office or job.

- 1) With the exception of Articles 353 and 356, maltreatment that does not result in illness or an obstacle to the performance of a profession or occupation shall be punished as light maltreatment by a maximum imprisonment of three months or a maximum fine of three hundred rupiahs.
- 2) Attempt to commit a crime. The elements of light maltreatment are that it is not premeditated maltreatment, it is not maltreatment committed against a mother/father/child/wife, an employee on duty, it does not include substances harmful to life, and it does not cause illness or impediment to the performance of work or livelihood.

Ordinary maltreatment carries a maximum penalty of three months imprisonment or a fine of three hundred rupiahs if it does not fall under the provisions of Article 353 and Article 356 of the Indonesian Penal Code, and does not cause illness or impede the performance of work.

### **Serious maltreatment Article 353 KUHP**

Article 353 of the Criminal Code on aggravated assault reads as follows :

1. Any person who with deliberate intent causes serious harm to another person shall, being guilty of serious maltreatment, be punished by a maximum imprisonment of eight years.
2. If the fact results in death, the offender shall be punished by a maximum imprisonment of ten years. Aggravated maltreatment Article 353 of the Penal Code, has 3 (three) forms, namely:  
Aggravated maltreatment that does not result in serious injury or death.  
There are 5 (five) elements of premeditated maltreatment that do not result in serious injury or death, namely:
  - a. opzet  
This element is the element of deliberate intent from consciousness and deliberate intent in the awareness of keapstian. The element of intentionality if categorized as maltreatment even though the result is serious injury.
  - b. The element of action is premeditation, this element of action has 3 conditions, namely:
    - 1) Deciding the will in a calm atmosphere
    - 2) There is sufficient time from the onset of the will to the execution of the will.
    - 3) The execution of the will or the act of persecution is carried out in a calm state.
  - c. Other people's body elements  
In this case the act intended by the perpetrator must be an act directed against another person. The maltreatment must be directed at the body of another person, because basically maltreatment is not known as maltreatment against oneself, as in the crime of murder, where the law has never made suicide a criminal offense, so in maltreatment it is the same. Persecution against oneself does not make sense in the formulation of the crime.
  - d. Which activate is the sole purpose of the perpetrator
  - e. Planning in advance
    - 1) Penganiayaan berencana yang berakibat luka berat.  
That in this maltreatment the perpetrator actually only wanted and planned to inflict bodily harm and pain on the intended victim, but because the actions taken by the perpetrator were excessive, this maltreatment caused serious injury.
    - 2) Aggravated maltreatment resulting in death.  
That in premeditated maltreatment resulting in death it is not an act that is unwanted and planned by the perpetrator, because the perpetrator only wants to cause pain and bodily injury but because the perpetrator is not controlled his actions result in death.

### **Serious maltreatment Article 354 of the Criminal Code**

Serious maltreatment is defined in Article 354 of the Penal Code which reads as follows:

- a. Any person who with deliberate intent seriously injures another person, shall, being guilty of serious maltreatment, be punished by a maximum imprisonment of eight years.
- b. If the fact results in death, the offender shall be punished by a maximum imprisonment of ten years.

Serious maltreatment (zwaar lichamelijk letsel toebrengt) or what can be called the infliction of serious bodily harm on another person must be committed intentionally. The intent must be in relation to the elements of the crime, namely: that the act is committed with the result for which the prohibition is made and that the act is unlawful.

The three elements above must be mentioned in the law as elements of a criminal offense, a prosecutor must be careful in formulating what has been done by a defendant and he must also cure the criminal charge in the elements mentioned in the law as elements of a criminal offense.

In relation to the element of intent, this intent must be addressed both to the act, (e.g. stabbing with a knife), and to the effect, namely serious injury, we can only formulate serious injury as described in Article 90 of the Criminal Code as follows serious injury means :

- a. Falling ill or receiving an injury from which there is no hope of a full recovery, or from which there is a danger of death
- b. Is continuously incapable of performing the duties of his/her office or profession.
- c. Losing one of their senses
- d. Seriously injured (suffering from paralytic pain)
- e. Impairment of reasoning power for a period of four weeks
- f. Miscarriage or death of a woman's pregnancy

Article 90 of the Penal Code above describes the categories of serious injury, while the result of death in serious maltreatment is not an element of serious maltreatment.

### **Aggravated serious maltreatment Article 355 of the Criminal Code**

Article 355 of the Penal Code on premeditated serious maltreatment reads as follows:

1. Serious maltreatment committed with premeditation shall be punished by a maximum imprisonment of twelve years.
2. If the fact results in the death of the offender, the offender shall be punished by a maximum imprisonment of fifteen years.

Based on the formulation in the Article, serious maltreatment has 2 (two) types, namely:

1. Ordinary serious maltreatment is a form of maltreatment that does not result in death, where the serious injury suffered by the victim must actually occur and it must also be proven that the serious injury was the intended and planned consequence of the perpetrator.
2. Aggravated premeditated maltreatment resulting in death is aggravated premeditated maltreatment, where the aggravating factor is that death occurs but the death of the victim was not intended by the perpetrator.

Death in this criminal offense is only a result that is not intended and planned, because if the death is intended then the realm is murder Article 388 of the Criminal Code while if the death is planned then it falls into premeditated murder Article 340 of the Criminal Code.

The elements of aggravated maltreatment are a combination of the elements of aggravated maltreatment in Article 354 of the Criminal Code and the elements of aggravated maltreatment in Article 353 of the Criminal Code, namely:

- a. Element of intent
- b. Element of action
- c. Element of the body of another person
- d. Result (serious injury)

If we look at the explanation above on the crimes of premeditated maltreatment and serious maltreatment, then this serious maltreatment is a combination of serious maltreatment (Article 354 paragraph 1 of the PC) and premeditated maltreatment (Article 353 paragraph 1 of the PC). In other words, for serious maltreatment to occur in premeditated maltreatment, both forms of maltreatment must occur simultaneously. Because they must occur together, both the elements of serious maltreatment and the elements of premeditated maltreatment must be fulfilled (Hiariej, 2016).

In judicial practice, before this juridical consideration is proven and considered, the judge will first draw facts in the trial that arise and are a cumulative conclusion from the testimony of witnesses, the testimony of the defendant and the evidence presented and examined at trial. Basically, the facts in the trial are oriented towards the dimensions of locus, and tempus delicti, modus operandi, how the criminal offense was committed, the cause or background of why the defendant committed the criminal offense, then what are the direct or indirect consequences of the defendant's actions, what evidence was used by the defendant in committing the criminal offense and so on. After the facts in the trial are disclosed, the judge's decision then considers the elements of the criminal offense that have been charged by the public prosecutor.

The public prosecutor must prove that the defendant's actions have fulfilled the elements of the article charged. The public prosecutor charged the defendant with a single charge. Thus, the public prosecutor must be confident in the charges to charge the perpetrator for his actions. To prove the public prosecutor's claim that the defendant committed the crime of maltreatment as stipulated in Article 351 paragraph (1) of the Criminal Code, the elements of the crime must be fulfilled. The elements of the crime of persecution are as follows:

**a. Willfulness**

Intentionality means that the defendant knowingly committed the act of maltreatment and knew the consequences of his actions. Intentionality determines whether the defendant's actions constitute persecution or not. It is the duty of the public prosecutor to prove this in court. The act committed by the defendant intentionally does not only include the act itself but also causes pain or injury to another person.

Based on the facts presented during the trial, when the witness was cooking in the kitchen he saw the defendant throw a coffee pot at the victim MR, then the defendant took a drawer from the table and was about to hit him but was stopped by the defendant's cousin.

The victim MR told the witness that while she was in a relationship with the defendant AR the victim often suffered violence and beatings committed by the defendant and suffered an injury to her leg and a headache as a result of the beatings committed by the defendant. Based on the description of the facts above, the element of intent was proven.

**b. The existence of an act (committing maltreatment)**

The law does not clearly define the meaning of maltreatment, so there is no common agreement on the form of maltreatment. According to jurisprudence, maltreatment is defined as intentionally causing distress, pain or injury to the body of another person. Meanwhile, according to the 4th paragraph of Article 351 paragraph (1) of the Criminal Code, maltreatment also includes damaging the health of another person. All acts of maltreatment must be committed intentionally and not with proper intent or exceeding permissible limits.

Based on Article 183 of the Criminal Procedure Code, it is explained that the judge may not impose a sentence on a person unless at least two valid evidence. The evidence can provide an explanation that a criminal act of persecution actually occurred and that the defendant is guilty of committing the act (Poernomo, 1984).

Talking about evidence, of course, cannot be separated from the explanation provided by the Criminal Procedure Code. Where, according to Article 184 paragraph (1) of the Criminal Procedure Code, the recognized evidence are:

- a. Witness testimony
- b. Expert testimony
- c. Letter
- d. Clues
- e. Defendant's statement

The above formulation, when connected with the Manokwari District Court Decision Number: 149 /Pid .B.2021/PN. Mnk, what is used as a juridical consideration by the judge is all the facts revealed at trial. The facts referred to are in the form of evidence as required by Article 184 of the Criminal Procedure Code. In the trial, the evidence presented by the public prosecutor was the testimony of witnesses and the testimony of the defendant as well as evidence. Based on these facts, it was proven that the defendant committed the act of maltreatment.

**c. Result of the act (causing bodily injury)**

This third element is the element of an act that causes bodily harm. In doctrine, injury is defined as the presence or occurrence of a change in the body, or becoming different from its original appearance before the act was committed. Based on Visum et Repertum Number 353/43/VI/2021 dated June 10, 2021 signed by Dr. Sintong Halomoan Sianturi at Manokwari Regional Hospital with the following examination results:

- a. Bruises (+) on right and left hands measuring 0.5 cm x 02 cm
- b. Abrasions (+) on the chest measuring 0.5 cm x 0.5 cm and 5 cm
- c. Open wound (+) on the chest measuring 1 cm x 6 cm

When linked to the definition of injury previously mentioned, the Panel of Judges concludes that the injuries suffered by the victim MR meet the criteria of injury because as a result of the actions of the Defendant, there has been a change in the body of the victim MR, who was previously still in a healthy and normal condition, to experience abrasions, lacerations, and bruises on the victim's body.

### **The element "every person"**

Considering that what is meant by "every person" in this element is directed at every legal subject who is brought by the Public Prosecutor with an indictment to the trial and can be held accountable for his actions.

Considering that the trial has been confronted with a person by the name of AR as mentioned in the indictment of the Public Prosecutor and based on the testimony of witnesses in this case it is true that he is the defendant AR with the identity as charged by the Public Prosecutor as mentioned above and not someone else and the defendant is also spiritually healthy and capable of being responsible, thus the element of "every person" has been fulfilled.

### **The element of "inflicting pain or damaging the health of another person"**

What is meant by "inflicting pain or damaging the health of others" in this element is any person, both men and women, as a legal subject who can be held accountable for his actions that are not dependent on certain qualities or positions. Based on the testimony of witnesses given under oath and the testimony of the defendant in court, the defendant AR is the person who is held accountable for the criminal offense charged to him (Arief, 2010).

During the trial the defendant was able to understand and answer the questions posed by both the Panel of Judges and the Public Prosecutor, there were no excuses or justifications found in the defendant, and during the trial examination the defendant was physically and mentally healthy. Therefore, the element of "causing pain or damaging the health of others" has been fulfilled (Hadikusma, 1992).

If the evidentiary process is declared to have been completed, the judge in this case makes a decision. Based on Article 1 point 11, a court decision is a judge's statement pronounced in an open court session, which can be in the form of punishment or acquittal or release from all legal charges in the case and in the manner provided for in this law. The court decision is the output of a judicial process that includes the process of examining witnesses, examining defendants, and examining evidence (Muhammad, 2007).

The definition of judge's consideration according to Peter Mahmud Marzuki by calling it *ratio decidendi*, namely the legal reasons used by the judge to reach his decision. Based on Article 197 letter (d) formulates considerations that are concisely arranged regarding the facts and circumstances along with the evidence obtained from the trial examination which is the basis for determining the defendant's guilt. In this case, according to the analysis in this legal trial, where the judge in this case did not consider the independence and confidence of the judge (independence of the judiciary) in making a decision, the judge is authorized to give a decision to impose a sentence if the perpetrator of the crime is proven legally and convincingly to have committed a criminal act. In an effort to make a decision, the judge must have juridical considerations consisting of the prosecutor's indictment, the defendant's testimony, witness testimony and articles that are the legal basis for his decision. In addition, there are also non-juridical considerations consisting of the background of the defendant's actions, the consequences of the actions and the condition of the defendant at the time of committing these actions. The judge's decision handed down to the defendant must be based on a sense of responsibility, justice, wisdom, and professionalism from a judge, especially in this case the victim is a woman who takes into account the mental health of the victim.

### **CONCLUSION**

According to the results of the research and discussion, the application of the law in case number 149 / Pid.B.2021. PN. MNK in, namely: All elements of the criminal offense of persecution committed by the defendant have been fulfilled in the trial, but in this case the provision of charges by the Panel of Judges in determining the article given is not in accordance with what has been experienced and felt by the victim and the Judge in this case should also in giving a decision must also consider several rights, one of which is the mental psychological health of the victim. In making considerations, it must be documented to determine the proven guilt, it must pay attention to all aspects of the facts revealed in the trial, in determining the criminal offense committed by the defendant, it must be accompanied by the reasons that are used as the basis for the decision so that it is not null and void, so that the judge in formulating a proven criminal offense must be in harmony with the decision so that it can find legal certainty for the defendant.

### **REFERENCES**

Arief, B. N. (2010). *Bunga Rampai Kebijakan Hukum Pidana, Perkembangan Penyusunan Konsep KUHP Baru*. Jakarta: Kencana.

- Chazawi, A. (2001). *Pelajaran Hukum Pidana 1*. Jakarta: PT.Raja Grafindo Persada.
- Chazawi, A. (2007). *Pelajaran Hukum Pidana Bagian 1: Stelsel Pidana Tindak Pidana, Teori – Teori Pemidanaan, dan Batas Berlakunya Hukum Pidana*. Jakarta: PT. Raja Grafindo Persada.
- Efendi, J., & Ibrahim, J. (2018). *Metode Penelitian Hukum Normatif dan Empiris*. Depok: Prenamedia Group.
- Hadikusma, H. (1992). *Bahasa Hukum Indonesia*. Bandung: Alumni.
- Hiariej, E. O. (2016). *Prinsip-Prinsip Hukum Pidana*. Yogyakarta: Cahaya Atma Pustaka.
- Ismail, F. (2014). *Dinamika kerukunan Antar Umat Beragama*. Bandung: PT. Remaja Rosdakarya.
- Lamintang, P. (2011). *Dasar-Dasar Hukum Pidana Indonesia*. Bandung: PT Citra AditnyaBakti.
- Lamintang, P. (2014). *Dasar-dasar Hukum Pidana Indonesia*. Jakarta: Citra Aditya Bakti.
- Lubis, R. (2005). *Cetak Biru Peran Agama*. Jakarta: Puslitbang.
- Marpaung, L. (2002). *Tindak Pidana Terhadap Nyawa Dan Tubuh*. Jakarta: Sinar Grafika.
- Muhammad, R. (2007). *Hukum Acara Pidana Kontemporer*, Bandung: PT. Citra Aditnya Bakti.
- Nursahidin, N., Brajadenta, G. S., Jubaedah, S., & Fajarianto, O. (2023). Improving health clinic services through the application of QR code-based digital technology. *Jurnal Aisyah: Jurnal Ilmu Kesehatan*, 8(2).
- Poernomo, B. (1984). *Asasa-asas Hukum Pidana*. Jakarta: Ghalia.
- Sari, I. N., Fajarianto, O., Kurniawan, C., Wulandari, T. C., & Marlina, E. (2023). Jabung Village Dairy Farmers: Milk Education Center. *Dinamisia: Jurnal Pengabdian Kepada Masyarakat*, 7(1), 209-214.
- Sudarsono. (2007). *Kamus Hukum*. Jakarta: PT.Rineka Cipta.
- Sudrajat, D., Siswondo, S., Harsono, Y., & Fajarianto, O. (2023). THE INFLUENCE OF LEADERSHIP STYLE AND WORK DISCIPLINE ON EMPLOYEE PERFORMANCE. *International Journal of Economics, Business and Accounting Research (IJEBAR)*, 7(2), 641-648.
- Suteki, & Taufani, G. (2018). *Metodologi Penelitian Hukum*. Depok: Rajawali Pers.