

ARTICLE

Implementation of the Witness and Victim Protection Agency in Providing Protection to Victims of Vigilantes (*Eigenrichting*)

Implementasi Lembaga Perlindungan Saksi dan Korban dalam Memberikan Perlindungan Terhadap Korban Main Hakim Sendiri (Eigenrichting)

Nurul Fadilah^{1*}

¹ University of Stirling, Scotland, United Kingdom

* Corresponding author: nurulfadilah667@gmail.com

Abstract

In Indonesia, witness and victim protection institutions (LPSK) need to be discussed in term of the implementation and its protection to vigilante's victim. The normative law and secondary data are used to conduct this research. It can be seen that LPSK does not give the protection right yet to vigilante's victim. It is caused by the victim does not apply for the protection right through the form as a mandatory. This situation leads ineffectiveness of the protection right to the vigilante's victim from LPSK since some of the victim not ready to report or take an action after the crime occurred. Indeed, medical and psychological rehabilitation need to be fulfilled for the recovery because the victim mostly suffered physically and mentally due to the persecution. Even though the main victim passed away, but the family still have the right like restitution from the offender since qualified as secondary victim.

Keywords

Vigilante (*Eigenrichting*); LPSK; Legal Protection



Abstrak

Di Indonesia, hadir Lembaga Perlindungan Saksi dan Korban (LPSK). Dalam implementasinya, perlu dikaji bagaimana Lembaga tersebut memberikan perlindungan terhadap korban main hakim sendiri (*Eigenrichting*) dan bentuk perlindungan bagi korban tersebut. Metode penelitian yang digunakan adalah hukum normatif dan menggunakan data sekunder. Hasil penelitian ini menyimpulkan bahwa belum ada korban main hakim sendiri yang mendapatkan perlindungan dari LPSK dikarenakan tidak adanya pengajuan permohonan perlindungan oleh korban, hal ini menjadi penghambat dalam pemberian perlindungan oleh LPSK, karena tidak semua korban siap secara mental untuk berperan aktif dalam proses pengajuan permohonan setelah apa yang dideritanya. Selain itu, pemenuhan rehabilitasi medis dan psikologis perlu diberikan, karena pada umumnya korban main hakim sendiri merupakan korban dari tindakan penganiayaan atau pengeroyokan yang mengakibatkan adanya penderitaan secara fisik dan psikologis. Jika korban meninggal dunia, keluarga tetap bisa dikatakan sebagai korban tidak langsung dan dalam hal ini berhak atas restitusi dari pelaku.

Kata Kunci

Main Hakim Sendiri; LPSK; Perlindungan Hukum

Introduction

"Thieves act as mobs move," the proverb defines the attitude that is most common and occurs throughout Indonesia. For example, the tragedy that befell MA, a man who was beaten and burned alive by residents in Bekasi Regency, Tuesday (1/8/2017). This happened because MA was accused of stealing an amplifier belonging to an Al-Hidayah prayer room in Hurip Jaya Village, Babelan District, Bekasi Regency.¹

Vigilante is a translation of the Dutch term "Eigenrichting" which is defined as an action to punish a party without going through a process in accordance with applicable law or acting arbitrarily.²In fact, the Indonesian Criminal Code does not specifically regulate vigilantism. However, people who commit acts of violence against perpetrators of criminal

¹ <http://megapolitan.kompas.com/read/2017/08/04/10185541/main-hakim-sendiri-nasib-tragis-ma-korban-penghakiman-massa-di-bekasi->

² Sumardi Efendi, "Kejahatan Main Hakim Sendiri (*Eigenrichting*) Menurut Hukum Positif Dan Fiqh Jinayah", *Jurnal Perundang-undangan dan Hukum Pidana Islam*, Vol.5 no. 1 (2020) :5 7

acts without going through the applicable legal process can be subject to articles in the Criminal Code, including: Article 351 of the Criminal Code concerning abuse, Article 170 of the Criminal Code concerning beatings,³ and Article 406 of the Criminal Code concerning vandalism.⁴

The rise of vigilantism in Indonesia is generally motivated by the public's distrust of existing legal authorities, giving rise to the perception that perpetrators of criminal acts will not receive appropriate punishment and that they must be judged directly.⁵ As a result of these actions, vigilante victims emerge who are not necessarily involved in criminal acts because there has been no decision from the court.

In Indonesia, there are institutions that have the authority to protect witnesses and victims. The existence of Law Number 13 of 2006 concerning Witness and Victim Protection (PSK) cannot be separated from the desire to complete procedural institutions in the criminal justice process. This is intended so that in the criminal justice system there is a mechanism for protecting witnesses and victims, so that the criminal justice system in Indonesia becomes a system that is not only oriented towards perpetrators, but also oriented towards witnesses and victims.⁶

Based on the description above, the researcher is interested in discussing the implementation of the LPSK's role in providing protection to victims of vigilantism and what forms of protection there are for victims of vigilantism. To answer this question, the author uses criminal justice system theory and victim protection theory.

Method

This type of research is normative legal research using secondary data or positive legal inventories and interviews. The research approach is to use a statutory approach using Law No. 31 of 2014 concerning Amendments to Law Number 13 of 2006 concerning

³ Willi Adiansyah, Warih Anjari, "Penegakan Hukum Tindakan Main Hakim Sendiri yang Memenuhi Unsur Pasal 170 dan Pasal 351 Kitab Undang-Undang Hukum Pidana", *Jurnal Hukum Staatsrechts*, Vol.5, No 1 (2022):4-5.

⁴ Bismar Manik, "Analisis Tindak Pidana Bagi Pelaku Main Hakim Sendiri dan Tindakan Anarkis Terhadap Seseorang yang diduga Melakukan Tindak Pidana", *Jurnal Mahasiswa UPMI*, Vol.1, No.1 (2020):1.

⁵ I Made Khrisna Dwipayana, dkk, "Pemidanaan Terhadap Pelaku Main Hakim Sendiri Dalam Kaitannya Dengan Kontrol Sosial (Social Controlling)", *Jurnal Interpretasi Hukum*, Vol.1, No.2 (2020): 64.

⁶ Law Number 31 of 2014 concerning Amendments to Law Number 13 of 2006 concerning Protection of Witnesses and Victims.

Protection of Witnesses and Victims, and Government Regulation Number 7 of 2018 concerning Provision of Compensation, Restitution and Assistance to Witnesses and Victim. The data analyzed is qualitative data analysis relating to the role of LPSK in providing protection to victims of vigilantism and the results of interviews with service and protection staff of the LPSK secretary general.

Result & Discussion

A. Implementation of LPSK in providing protection to victims of vigilantism (Eigenrichting)

LPSK is an independent institution, not under the executive, legislative or judicial branches and is domiciled in the Capital of the Republic of Indonesia which has representatives in all regions as needed. LPSK is responsible for providing protection and assistance to witnesses and victims based on their duties and authorities as regulated in law.⁷

LPSK's functions include providing protection services and assistance to witnesses and victims in every criminal justice process and facilitating recovery steps for victims of criminal acts, especially in applying for compensation or restitution. Apart from that, LPSK also has the function of collaborating with relevant and authorized agencies in implementing witness and victim protection.⁸

From the explanation above, it can be seen that LPSK is only a supporting institution to protect victims, not an institution that is included in the criminal justice system in Indonesia such as the police, prosecutor's office or judicial institution because it is separate from the judiciary.

Meanwhile, LPSK provides protection as intended in Article 5 of the PSK Law, in two ways, namely:

1) Through application

The first procedure for obtaining protection can be done by applying in writing to the LPSK. The service for receiving protection requests is submitted to the LPSK and will be processed through the LPSK BPP (Service Request Agency) which will be met through a plenary meeting by LPSK members consisting of 7 people to obtain a decision.⁹ and those who can submit a request are: the reporter,

⁷ Nadia Ayu Apriani, Margo Hadi Pura, "Perlindungan Hukum Saksi Dan Korban Penganiayaan Oleh Lembaga Perlindungan Saksi Dan Korban", *Jurnal Ilmu Hukum*, Vol.05, No. 02, (2020): 230-231.

⁸ Ibid p. 230

⁹ Results of an interview with Sandra Anggita, Head of the Service and Protection Sub-Section of the LPSK Secretary General.

witness, victim, expert, family or legal representative and authorized official (decision in writing no later than 7 (seven) days after the request for protection is submitted).

- 2) In certain cases LPSK can provide protection without submitting an application.¹⁰

In certain cases LPSK can provide protection to witnesses and/or victims through LPSK decisions based on threats that endanger witnesses and/or victims. However, in this case there must be prior consent from the victim.¹¹ For example, when a very emergency situation occurs, and threatens the safety of witnesses or victims, or an event that is of concern to the wider community or for certain reasons makes the victim in that case worthy of protection, then the LPSK can offer protection to the witness or victim. However, in this case, LPSK cannot directly provide protection, but protection from LPSK is voluntary. This means that the victim must be ready and agree to receive this protection, which will then be carried out by an LPSK agreement between the parties (LPSK and the victim). If the victim in this case is a child, then this agreement can be represented by their guardian.¹² In the context of protection, when an application for protection has been received by the LPSK, after that an LPSK agreement will be made. The LPSK agreement contains the rights and obligations of witnesses and/or victims.

The criminal acts that are a priority for protection by LPSK are serious human rights violations; corruption and money laundering crimes, terrorism, human trafficking crimes, torture and serious ill-treatment, narcotics and psychotropic crimes, sexual crimes against women and children, as well as other criminal acts that result in the witness/victim being faced with a situation that is very dangerous for their life.

In cases of vigilantism, not all victims of vigilantism can obtain protection from the LPSK, because apart from having to go through the mechanism as explained above, the LPSK can only act if the case of vigilantism has been processed by law, meaning it is already in the realm of proceedings. criminal justice, because the LPSK's role is to exercise its authority only in the criminal justice process and not all cases of vigilantism are resolved in the process of the criminal justice system, but there are some people who prefer to have it

¹⁰ Article 29 paragraph (2) Law No. 31 of 2014 concerning Amendments to Law Number 13 of 2006 concerning Protection of Witnesses and Victims

¹¹ Results of an interview with Sandra Anggita, Head of the Service and Protection Sub-Section, Secretary General of LPSK.

¹² Ibid

resolved outside the criminal justice process or deliberation, so for cases of vigilantism that not being processed by law is not within LPSK's authority to play a role in it.¹³ Meanwhile, when the act of taking the law into your own hands is processed by law, or the victim reports it to the police, the LPSK has the authority to carry out its role if the victim makes a request for protection from the LPSK, but not all requests for protection submitted to the LPSK are accepted, because procedurally, the LPSK will first check whether the witness or victim deserves to be protected by LPSK or not.

Even though LPSK is outside the criminal justice system, it can be seen that LPSK is very closely related to the criminal justice system, because in providing protection, LPSK can provide protection when the case has been processed by law or within the realm of the criminal justice system, and LPSK in providing protection is not just a treatment for one case, but the target of protection is individual, for example when in one case there are two or three victims, then protection is given to each victim depending on the type of suffering experienced and depending on the form of protection proposed by the victim,¹⁴ because every crime or victimization is unique, so are the victims. Therefore, all treatment and responses to victims are personal/subjective¹⁵ so the handling is different too.

So, what is LPSK's attitude towards the vigilante case that occurred in Bekasi? A case of beating and arson occurred against MA because he was accused of being the perpetrator of the theft of an amplifier belonging to the Al-Hidayah prayer room in Hurip Jaya Village, Babelan District, Bekasi Regency.¹⁶ MA was burned by a mob in Babelan, Bekasi Regency, Tuesday 1 August evening, leaving behind a wife and a son.¹⁷

If you look at the chronology, this case has entered the realm of the criminal justice system where one of LPSK's rights of involvement has been fulfilled. Even though MA has died, in theory, his family and children are indirect victims because MA is the backbone of the family who has the responsibility to provide daily living, because according to Law Number 31 of 2014, in Article 1 Paragraph (3), what is meant by victim is: "People who experience physical, mental suffering and/or economic loss resulting from a criminal act."¹⁸

¹³ Results of an interview with Sandra Anggita, Head of Service and Protection Sub-Section, Secretary General of LPSK.

¹⁴ Ibid

¹⁵ Adrianus Meliala, "Dukungan dan Pemulihan bagi Korban Kejahatan serta Praktik-Praktik Terbaik Perlakuan Untuk Korban", *Jurnal Perlindungan*, Edisi 4, Vol.I (2014): 24.

¹⁶ <http://megapolitan.kompas.com/read/2017/08/05/13532951/kasus-pria-dibakar-polisi-sebut-warga-yang-main-hakim-sendiri-bisa-kena>.

¹⁷ <http://news.liputan6.com/read/3051369/5-fakta-baru-kasus-pria-dibakar-hidup-hidup-di-bekasi>

¹⁸ Law Number 31 of 2014 concerning Amendments to Law Number 13 of 2006 concerning Protection of Witnesses and Victims

Based on data, LPSK in this Supreme Court case took a pro-active stance by visiting the victim's family to explain the rights that could be facilitated by LPSK in accordance with Law No. 31 of 2014. However, from the victim's family there was no application submitted so LPSK could not provide protection because there must be an application first. Apart from that, LPSK considers that the victim's family has received a lot of assistance from various parties.¹⁹

To date, no victims of vigilantism have been given protection by LPSK, so LPSK does not have a role in providing protection to victims of vigilantism. This is based on the absence of applications for protection submitted to the LPSK, which is the reason why the LPSK does not provide protection. However, if we look more deeply, the existence of a mechanism for submitting requests by victims results in obstacles in the process of providing protection, because like it or not, the victim is required to play an active role in the process of submitting the application so that this can result in the victim becoming a victim again for the second time (secondary victimization) which is caused by a long process that must be gone through and it is not certain that the application can be immediately accepted because its feasibility must also be considered. in the LPSK plenary meeting. According to the author, this will actually hinder the protection of victims of vigilantism whose rights are guaranteed as Indonesian citizens based on Article 28D paragraph (1) of the 1945 Constitution of the Republic of Indonesia, and needs to receive serious attention because the level of suffering is quite alarming with the changes to the provisions in Witness and Victim Protection Act.

From this incident, the perception emerged that victim protection in Indonesia only focuses on the state's needs in witness statements in court or disclosure of criminal incidents, not because of the state's protection/contribution to the protection of the victims themselves.²⁰

1. Form of Protection for Victims of Vigilantes

Victim protection in a broad concept includes two things, namely:

- 1) Legal protection against becoming a victim of crime or that is synonymous with protecting a person's human rights or legal interests. This includes indirect victim protection.

¹⁹ Results of an interview with Sandra Anggita, Head of Service and Protection Sub-Section, Secretary General of LPSK.

²⁰ Rena Yulia, dkk, "Perlindungan Hukum Terhadap Korban Kejahatan Pada Proses Penyelidikan Dan Penyidikan Dalam Sistem Peradilan Pidana", *Jurnal Hukum & Pembangunan* 49, No.3 (2019): 662-663.

- 2) Protection to obtain guarantees or legal compensation for the suffering or loss of people who have been victims of crime, including the victim's right to obtain assistance and fulfillment of the right to access to justice and fair treatment, this means direct victim protection.²¹

LPSK in providing protection and services to crime victims is divided into four types of services, including physical protection services, procedural rights protection services, protection services in the form of medical, psychological and psychosocial rehabilitation, and finally protection services in the form of filing for restitution or compensation.

Physical protection is assistance and escort to the victim if the victim is in a very emergency situation and is vulnerable to threats from any party. Apart from escorting, this physical protection can also take the form of placing victims in LPSK safe houses, while procedural rights services are in the form of assistance and legal assistance in the criminal justice process. However, legal assistance here does not take the form of services like an advocate, but rather assistance and providing legal understanding of the ongoing legal process. The next service is in the form of medical, psychological and psychosocial rehabilitation, in this service LPSK collaborates with psychologists, doctors or other health centers to help victims recover to their original condition. This psychosocial rehabilitation, LPSK usually collaborates with related agencies to restore victims in terms of clothing, food and shelter so that victims can return to living their normal social life. For victims of vigilantism, if they receive protection from LPSK, it will be given according to the victim's needs and depending on the type of service requested.²²

In Law Number 31 of 2014, Article 7 paragraph (1) explains that those entitled to compensation are victims of serious human rights violations and victims of terrorism. Meanwhile, victims of other criminal acts cannot apply for compensation. The mechanism for providing compensation for victims of serious human rights violations is regulated in Government Regulation Number 7 of 2018 concerning Providing Compensation, Restitution and Assistance to Witnesses and Victims.

²¹ C. Maya Indah, *Perlindungan Korban Suatu Perspektif Viktimologi dan Kriminologi*. (Jakarta: Kencana, 2014), p.125.

²² Results of an interview with Sandra Anggita, Head of Service and Protection Sub-Section, Secretary General of LPSK.

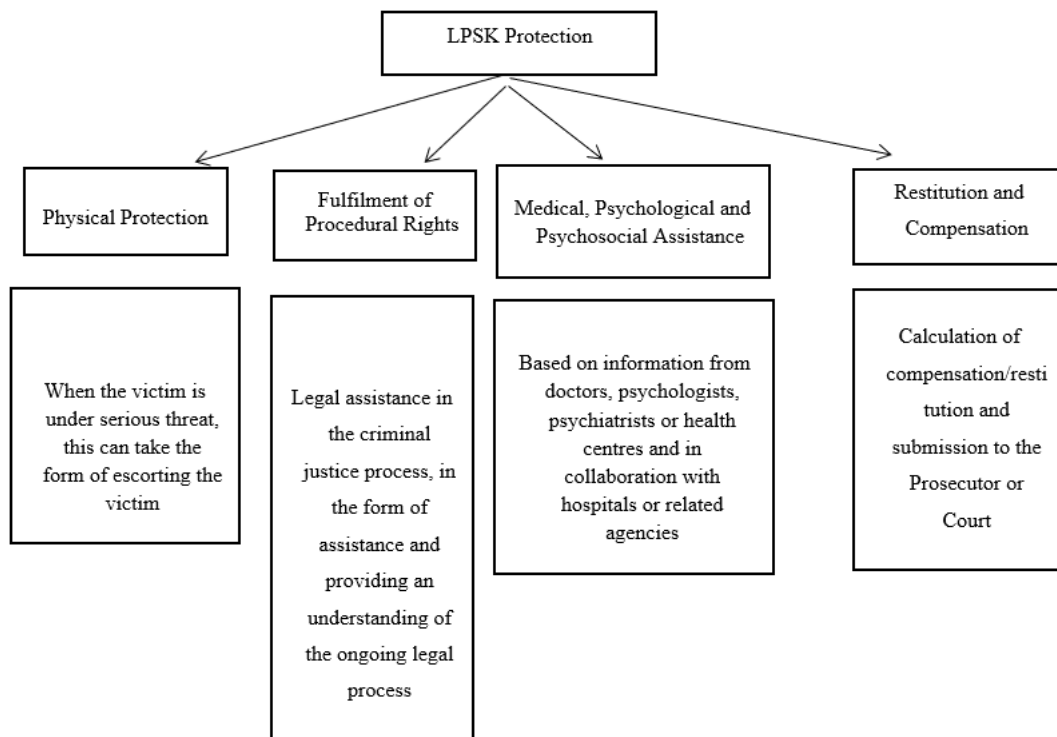


FIGURE 1. Protection Scheme by LPSK

In general, in theory there are 2 (two) protection models, namely the procedural rights model and the service model.²³In short, the procedural model emphasizes the possibility of victims playing an active role in the criminal justice process, such as assisting the public prosecutor, being involved at every level of case examination, having their opinion heard if the convict is released on conditional terms, and so on. Meanwhile, the service model emphasizes providing compensation in the form of compensation, restitution and efforts to improve the condition of victims who experience trauma, fear and depression due to crime.²⁴ This model determines standard standards for services to victims carried out by police, prosecutors and judges. For example, health services, assistance, providing compensation and compensation and restitution.²⁵ This approach views crime victims as special targets to be served by the police and other law enforcers.

LPSK in its role uses a mixed protection model, namely a procedural rights model and a service model. For the procedural rights model, victims are given the right to play an

²³ Novita Erdatimulia, dkk, “Viktimologi Model Pengaturan Perlindungan Hukum Pidana Bullying Di Lingkungan Sekolah”, *Journal of Law and Social-Political Governance*, Vol.2, No.1 (2022) 295.

²⁴ Ibid p.295

²⁵ <http://www.hukumonline.com/berita/baca/hol17767/model-perlindungan-saksi-dan-korban-tergantung-anggota-lpsk>

active role in the protection process in resolving criminal cases, an example is when victims are given the right to choose the form of protection that will be provided and there are certain mechanisms to be able to obtain protection from LPSK. Apart from that, the service model is that LPSK determines standard standards for coaching crime victims and victims as special targets to be served.

However, basically, LPSK is only limited to being a supporting unit in helping victims facing the criminal justice process. For example, in the mechanism for providing restitution, LPSK only has the authority to provide recommendations to law enforcement regarding whether or not the victim deserves restitution and also regarding calculating the amount of restitution requested by the victim. Next, it is up to law enforcement to decide whether to grant or reject restitution. If, based on the judge's considerations based on the facts of the trial, it turns out that the judge refuses restitution, then the LPSK is not given the authority to take legal action.

Regarding vigilantism, victims of vigilantism can receive any form of protection from the LPSK, because vigilantism is included in the category of criminal acts that fulfill the elements of acts of abuse, threats or beatings. As in Article 5 of Law No.31 of 2014, it regulates the rights of witnesses and/or victims of criminal acts. So that victims of taking the law into their own hands are entitled to these rights. Likewise with medical, psychological and psychosocial assistance, victims of vigilantism have the right to receive this protection, if the consequences of the criminal act cause physical, psychological suffering or cause the victim to be unable to carry out his social functions as before, such as losing his job or so on.

Then, victims of vigilantism are also entitled to restitution, because Article 7A of Law No. 31 of 2014 states that victims of criminal acts have the right to obtain restitution in the form of compensation for loss of wealth or income, compensation for losses incurred as a result of suffering directly related to the action. criminal charges, and/or compensation for medical or psychological treatment costs, this restitution application must go through LPSK.

Of the forms of protection that LPSK can provide to victims of vigilantism, victims of vigilantism are more suited to receiving forms of protection, medical, psychological rehabilitation, and services for restitution because in general victims of vigilantism are victims of criminal acts of abuse or beatings which will result in suffering. and physical losses that require medical and psychological rehabilitation, as well as restitution that must be obtained by the victim from the perpetrator for the suffering caused by him. Even though the victim has died, the victim's family is still an indirect victim who is entitled to

receive restitution in accordance with Article 7A paragraph (6) of Law Number 31 of 2014 concerning Protection of Witnesses and Victims.

Conclusion

To date, no victims of vigilantism have received protection from LPSK. This is because there was no application for protection by the victim. In the procedural mechanism, submitting an application first by the victim can actually be an obstacle in providing protection by LPSK, because not all victims are mentally and psychologically ready to play an active role in the process of submitting an application after what they have suffered so that they become victims, and this can also make victims take the law into their own hands to become victims a second time (secondary victimization). In fact, in essence LPSK is a state representative mandated by law to provide guarantees of protection for victims.

The forms of protection that LPSK can provide to victims vary, including physical protection, fulfillment of procedural rights, medical, psychological assistance and psychosocial rehabilitation, apart from that it can take the form of protection in applying for rights to restitution and compensation. Meanwhile, compensation can only be given to victims of terrorism and serious human rights violations. Of the various types of protection, the appropriate form of protection to be given to victims of vigilantism is the provision of medical and psychological rehabilitation, because in general victims of vigilantism are victims of acts of abuse or beatings which result in physical and psychological suffering, even if the victim dies. world, The family can still be said to be an indirect victim and in this case is entitled to restitution from the perpetrator, because based on Article 7A paragraph (6) in the event that the victim of a crime dies, restitution is given to the victim's family who are the victim's heirs. So that when applying for the right to restitution, the victim is entitled to procedural rights to be given an understanding regarding the ongoing legal process. In LPSK's considerations in determining a decision regarding a victim's eligibility for protection, it should not be absolute on priority cases, such as victims of serious human rights violations, victims of terrorism, victims of sexual violence against children, corruption and money laundering crimes, narcotics, but must also look at danger from the impact of a criminal act,

References

- Adrianus Meliala, “Dukungan dan Pemulihan bagi Korban Kejahatan serta Praktik-Praktik Terbaik Perlakuan Untuk Korban”, *Jurnal Perlindungan*, Edisi 4, Vol.I (2014).
- Bismar Manik, “Analisis Tindak Pidana Bagi Pelaku Main Hakim Sendiri dan Tindakan Anarkis Terhadap Seseorang yang diduga Melakukan Tindak Pidana”, *Jurnal Mahasiswa UPMI*, Vol.1, No.1 (2020).
- C. Maya Indah, *Perlindungan Korban Suatu Perspektif Viktimologi dan Kriminologi*. Jakarta: Kencana, 2014.
- <http://megapolitan.kompas.com/read/2017/08/05/13532951/kasus-pria-dibakar-polisi-sebut-warga-yang-main-hakim-sendiri-bisa-kena>,
- <http://news.liputan6.com/read/3051369/5-fakta-baru-kasus-pria-dibakar-hidup-hidup-di-bekasi>,
- <http://www.hukumonline.com/berita/baca/hol17767/model-perlindungan-saksi-dan-korban-tergantung-anggota-lpsk>
- I Made Khrisna Dwipayana, dkk, “Pemidanaan Terhadap Pelaku Main Hakim Sendiri Dalam Kaitannya Dengan Kontrol Sosial (Social Controlling)”, *Jurnal Interpretasi Hukum*, Vol.1, No.2 (2020).
- Nadia Ayu Apriani, Margo Hadi Pura, “Perlindungan Hukum Saksi Dan Korban Penganiayaan Oleh Lembaga Perlindungan Saksi Dan Korban”, *Jurnal Ilmu Hukum*, Vol.05, No. 02, (2020).
- Novita Erdatimulia, dkk, “Viktimologi Model Pengaturan Perlindungan Hukum Pidana Bullying Di Lingkungan Sekolah”, *Journal of Law and Social-Political Governance*, Vol.2, No.1 (2022).
- Penjelasan Peraturan Pemerintah Republik Indonesia Nomor 44 Tahun 2008 Tentang Pemberian Kompensasi, Restitusi, Dan Bantuan Kepada Saksi Dan Korban.
- PP Nomor 7 Tahun 2018 Tentang Pemberian Kompensasi, Restitusi dan Bantuan Kepada Saksi dan Korban.
- Rena Yulia, dkk, “Perlindungan Hukum Terhadap Korban Kejahatan Pada Proses Penyelidikan Dan Penyidikan Dalam Sistem Peradilan Pidana”, *Jurnal Hukum & Pembangunan* 49, No.3 (2019).
- Sumardi Efendi, “Kejahatan Main Hakim Sendiri (*Eigenrichting*) Menurut Hukum Positif Dan Fiqh Jinayah”, *Jurnal Perundang-undangan dan Hukum Pidana Islam*, Vol.5 Edisi 1 (2020).
- Undang-Undang Dasar Negara Republik Indonesia Tahun 1945.
- Undang-Undang Nomor 31 Tahun Tahun 2014 Tentang Perubahan Atas Undang-Undang Nomor 13 Tahun 2006 Tentang Perlindungan Saksi Dan Korban.
- Willi Adiansyah, Warih Anjari, “Penegakan Hukum Tindakan Main Hakim Sendiri yang Memenuhi Unsur Pasal 170 dan Pasal 351 Kitab Undang-Undang Hukum Pidana”, *Jurnal Hukum Staatsrechts*, Vol.5, No 1 (2022).