

**A LEGAL ANALYSIS OF THE USE OF PHYSICAL VIOLENCE BY THE POLICE
DURING THE INVESTIGATION PROCESS OF ALLEGED CRIMINAL OFFENDERS****Raikhan Daffa Leksono¹**Program Studi Ilmu Hukum, Fakultas Hukum, Universitas Muhammadiyah Surakarta
C100190156@student.ums.ac.id**Dr. Syaifuddin Zuhdi²**Dosen Fakultas Hukum, Universitas Muhammadiyah Surakarta
sz123@ums.ac.id**ABSTRACT**

One of the most serious forms of violence occurring within the legal domain is the use of physical violence by police officers during investigations, particularly when a suspect has been identified as allegedly responsible for a criminal offense. Such violence is often justified by the absence of a confession deemed incompatible with the investigator's expectations in uncovering the case. This study employs a normative juridical approach and uses descriptive research methods. Regarding criminal investigations, the police hold the authority to initiate and terminate the investigation process. Based on Article 1 point (2) of the Indonesian Criminal Procedure Code (KUHAP), the author holds the perspective that investigation is an activity carried out by investigators to identify suspects and to either revoke the suspect status or proceed to prosecution through observational and analytical methods. In the investigative process, legal protection for suspects who experience acts of violence by rogue investigators includes the right to legal assistance and the right to file a pretrial motion (as stipulated in Article 77 of the Criminal Procedure Code). In terms of law enforcement, the police have the authority to take pre-emptive, preventive, and repressive legal actions against investigators who commit acts of physical violence during the investigation process.

Keywords: Violence, Investigation, Investigator.**INTRODUCTION**

Criminal law is an integral part of the Indonesian legal system, and numerous criminal cases have been thoroughly analyzed.(1) Violence is a common criminal act that occurs in everyday life. It can be defined as a physical act that causes harm, injury, or suffering, either intentionally or unintentionally, occurring briefly or continuously, which renders the victim vulnerable and coerced into complying with the perpetrator's demands.(2) Violence is often a manifestation of anger that is expressed physically, serving as a threat or severe warning to

realize the perpetrator's objectives

Although violence is prevalent in society, some cases arise within the legal system where such acts are considered violations of other legal provisions. Perpetrators of violence are frequently found in unfamiliar environments, but a significant number of violent acts also occur within close or familiar surroundings. This represents one of the most serious negative consequences.⁽³⁾ A particularly grave form of violence within the legal domain is the use of physical violence by police officers during the investigative process, particularly when a suspect has just been identified as allegedly responsible for a criminal offense. Such violence is often justified by the suspect's failure to confess, which is deemed inconsistent with the investigators' expectations in resolving the case. In these circumstances, violence is often used as a last resort to coerce the suspect into confessing or cooperating in the investigation.

This practice constitutes a violation of legal rights, as no party involved in the legal process is entitled to harm or inflict injury on any individual under investigation.

This issue can be clearly articulated through the provisions outlined in Chapter III of Indonesian National Police Regulation No. 8 of 2009, which pertains to the Standards of Conduct for Police Officers in Law Enforcement. ⁽⁴⁾ Article 10 of the regulation mandates that, in performing law enforcement duties, every police officer must adhere to the Code of Ethics, which includes the following obligations:

- 1) Consistently fulfill responsibilities as established by law;
- 2) Respect and uphold human dignity in the performance of their duties;
- 3) Use force only when necessary to prevent crime or assist in the apprehension of offenders or suspects, and only in accordance with established regulations on the use of force;
- 4) Maintain the confidentiality of information within their jurisdiction, unless disclosure is required for official duties or judicial proceedings;
- 5) Refrain from provoking or condoning acts of torture or cruel, inhuman, or degrading treatment or punishment, and not justify such acts by citing orders from superiors or exceptional circumstances such as war;
- 6) Ensure the full protection of the health of individuals in their custody and take immediate

action to provide necessary medical assistance;

- 7) Avoid involvement in any form of corruption or abuse of power contrary to the principles of law enforcement; and
- 8) Comply with the applicable laws, behavioral codes, and ethical standards.

Crime represents a multifaceted phenomenon that can be analyzed from various perspectives.(5) In this study, the author focuses on three main research questions:

- 1) What forms of protection are available to suspects during the criminal investigation process?
- 2) What are the legal protections available under Islamic law (*jinayah*) regarding acts of physical violence against suspects committed by investigators?
- 3) What legal enforcement measures can be taken against police officers who commit acts of physical violence during the investigation process?

Accordingly, the objectives of this research are: to examine the perspective of criminal law regarding acts of violence committed by investigators against suspects; to explore the legal protections for suspects subjected to violence during investigations from the viewpoint of Islamic criminal law (*jinayah*); and to analyze the legal enforcement mechanisms applicable to police officers who engage in violent conduct during the investigation process.

METHODS/IDEAS

Research is a rigorous, methodical, and consistent scientific effort that involves systematic analysis. Systematic analysis refers to an investigation conducted with precision and careful consideration. Methodology signifies the application of a reliable and coherent approach that aligns with an established framework. Therefore, research activities are carried out in a structured manner to yield results in the form of scientific findings, products or processes, scientific analyses, or new propositions.(6) The method employed for this research is the normative juridical approach. This approach is designed as a procedure to facilitate research by beginning with secondary data and later incorporating primary data. In addition to serving as a literature review using secondary sources, the normative juridical approach applies statutory

regulations as the legal foundation for evaluation and analysis.(7)

The data for this research were obtained from primary legal sources, which include laws, regulations, and all official legal documents such as the 1945 Constitution of the Republic of Indonesia, the Indonesian Penal Code (KUHP), the Criminal Procedure Code (KUHAP), Law No. 2 of 2002 on the Indonesian National Police, National Police Regulation No. 8 of 2009, and other relevant statutes and regulations.

Secondary legal materials consist of existing relevant information, such as journals, books, and scientific articles that discuss the issue of physical violence during police investigations of alleged criminal offenders.(8) Tertiary legal materials include definitions of uncommon terminology, whether in standard language translated from the Kamus Besar Bahasa Indonesia (KBBI), scientific terminology, or legal terms translated from legal dictionaries.

In gathering data from literature and printed media, the process involves reading and analyzing the content, interpreting the meaning, and elaborating on the concepts presented.(9) The researcher employed a qualitative data analysis method, which involves describing the material in a structured and systematic sequence, supported by case examples or real-life incidents that have been previously studied. This method enables readers to better understand the author's perspective and the context of the case being discussed.

RESULTS AND DISCUSSION

A. Forms of Protection for Suspected Criminal Offenders During the Investigation Process

Legal protection is a deliberate effort to safeguard individuals from violations of human rights resulting from criminal acts committed by others. Furthermore, the implementation of legal protection is facilitated through various legal measures undertaken by law enforcement officials to ensure both physical and psychological security, protecting individuals from coercion or threats posed by any entity.

In accordance with the 1945 Constitution of the Republic of Indonesia, Indonesia adheres to the principle of the rule of law (*rechstaat*) (10), as stipulated in Article 1(3), which guarantees that all individuals are equal before the law and are entitled to fair and impartial justice. This

principle is closely related to the doctrine of “equality before the law”, which asserts that every person is subject to the same legal standards and procedures. This legal norm is articulated in Article 27(1) of the 1945 Constitution, which declares:

"All citizens shall have equal status before the law and the government and shall be obliged to uphold the law and the government without exception."

The presumption of innocence is a fundamental legal standard that mandates that anyone suspected, arrested, detained, prosecuted, or brought before a court must be considered innocent until a final and legally binding verdict declares otherwise.⁽¹¹⁾ However, in practice, the enforcement of this legal doctrine is often inadequate.

Thus, the presumption of innocence serves as a critical framework for upholding citizens' rights in the pursuit of the fairest legal process, which encompasses the following aspects:

- a. Guarantees against arbitrary actions by state representatives or their agents;
- b. The judiciary must have jurisdiction and authority to impose sanctions and determine the guilt of the accused;
- c. Legal proceedings must be open and accessible to the public (not conducted in secrecy);
- d. The accused must be given a clear opportunity to defend themselves adequately. ⁽¹²⁾

In the context of the Indonesian Criminal Procedure Code (KUHAP), the recognition and safeguarding of a suspect's human rights are explicitly reflected in the essential elements of the presumption of innocence. These rights are guaranteed under several provisions of KUHAP, including but not limited to Articles 54, 55, 56, 58, 65, and 68, which support the formal protection of suspects' legal rights. Some key articles include:

- 1) Article 50(1) of KUHAP states that a suspect is entitled to an immediate investigation by the police and to be promptly handed over to the public prosecutor.
- 2) Article 50(2) stipulates that suspects whose cases qualify for immediate court submission must be promptly handled by the public prosecutor, while Article 50(3) grants the accused the right to be tried without undue delay.
- 3) Article 51(1) mandates that suspects must receive clear information, in a language they understand, about the charges during the investigation.

- 4) Article 51(2) ensures that the accused is informed of the allegations in a language they comprehend.
- 5) Article 52 guarantees that during investigation or trial, suspects or defendants may convey information to investigators or judges without third-party interference.
- 6) Article 53(1) entitles the accused to the assistance of an interpreter if they do not understand the language, with further provisions in Article 77.
- 7) Article 59 provides that a suspect or defendant under detention has the right to inform their family, cohabitants, or others in need of their legal aid or surety about their detention.
- 8) Article 60 grants the right to communicate with and receive visits from family or others to secure legal aid or bail.
- 9) Article 61 clarifies the right to communicate with non-case-related relatives for professional or familial purposes, either personally or through their legal counsel.
- 10) Article 62(1) ensures the right to correspond with lawyers or relatives, with necessary writing materials provided.
- 11) Article 62(2) prohibits the inspection of correspondence between the accused and their legal counsel or family unless there is compelling evidence of misuse.
- 12) Article 64 affirms the right of the accused to a public trial.
- 13) Article 66 addresses the obligation of suspects or defendants to prove their claims.

Within the formal criminal law framework, these provisions affirm the recognition of suspects or defendants as human beings created by God Almighty, endowed with inherent human dignity. KUHAP acknowledges their status as "entities with human dignity," requiring treatment consistent with fundamental moral principles. In this context, the supremacy of law must be upheld without compromising the most essential human rights of the accused. One of these critical rights is the presumption of innocence, which serves as a normative reference within Indonesian criminal law, both substantively and procedurally.⁽¹³⁾

Furthermore, the incorporation of the presumption of innocence into KUHAP provides a legal foundation for law enforcement officers to adhere to procedural accuracy at every stage of investigation. However, in practice, law enforcement still applies an inquisitorial system, which positions the suspect or accused as a passive object of the investigation and is often

accompanied by arbitrary treatment. Historically, the inquisitorial method was rooted in the colonial-era HIR (Het Herziene Indonesisch Reglement), which failed to sufficiently safeguard the rights and transparency of suspects, limiting their ability to advocate for themselves or assert their legal rights.

From the outset, law enforcement officers often assume the presumption of guilt, treating suspects as if a verdict has already been reached even before the investigation is concluded.

B. Legal Protection Against Physical Violence Toward Suspects by Investigators from the Perspective of Fiqh Jinayah

In Islamic criminal jurisprudence (fiqh jinayah), the concept of human rights is of paramount importance. Acts of violence committed against suspects during the investigation stage are considered clear violations of those rights. The two primary sources of Islamic law—the Qur'an and the Sunnah—affirm in their legal provisions that all rights must be upheld and restored. Accordingly, Islamic law provides a robust framework for the realization and protection of human rights.⁽¹⁴⁾ The use of violence during investigative procedures by law enforcement officials against individuals suspected of committing a crime is categorically illegal under Islamic law. The Qur'an explicitly forbids coercion against any individual. Investigators are expected to rely on their cognitive abilities and reasoned methods in uncovering the truth, rather than resorting to physical force or intimidation against suspects. Allah SWT emphasizes this principle in Surah Sad (QS. Shad) verse 26, which states:

يٰۤاٰدُوۤدُ اِنَّا جَعَلْنَاكَ خَلِيۡفَةً فِى الْاَرْضِ فَاَحۡكُمۡ بَيْنَ النَّاسِ بِالْحَقِّ وَلَا تَتَّبِعِ
الْهَوٰى فَيُضِلَّكَ عَن سَبِيۡلِ اللّٰهِ اِنَّ الَّذِيۡنَ يَضِلُّوۡنَ عَن سَبِيۡلِ اللّٰهِ لَهُمۡ
عَذَابٌ شَدِيۡدٌۢ بِمَا نَسُوۡا يَوْمَ الْحِسَابِ ﴿٢٦﴾

“O Daud, indeed We have made you a caliph (ruler) upon the earth, so judge between the people in truth and do not follow desire, as it will lead you astray from the path of Allah. Indeed, those who go astray from the path of Allah will have a severe punishment for having forgotten the Day of Reckoning.”

This verse has been analyzed by the Ministry of Islamic Affairs of Saudi Arabia through Tafsir Al-Muyassar, which interprets it as follows: “O Dawud (David), We have granted you authority and established your rule on earth; therefore, judge justly and without bias. Do not be swayed by personal inclinations when issuing judgments, as this may lead you away from the path of Allah’s law. Those who stray from Allah’s path will face a grievous punishment in Hell, for having neglected the Day of Judgment and their responsibility for their deeds.”

Within the framework of Islamic criminal law (*fiqh jinayah*), the use of violence against suspects during the investigative process is unequivocally considered a criminal act. The prevailing scholarly opinion—which aligns with the fundamental principles of justice in Islamic jurisprudence—strongly prohibits any form of physical abuse against suspects. It is imperative for law enforcement officers, investigators, and judges to pursue the truth using methods that are free from any form of coercion or physical harm. This obligation is further reinforced by the advancement of scientific knowledge and technological innovation, which offer tools for identifying perpetrators and facilitating their prosecution without resorting to violence. The acuity and integrity of investigators and judges play a vital role in ensuring that justice is served ethically and effectively.

Based on this explanation regarding the form of legal protection from the perspective of *fiqh jinayah*, the author argues that protection for suspects in this context includes the application of *qishash* (retributive justice), which entails an equivalent retaliation against immoral investigators who commit acts of violence during interrogation. However, *qishash* may be waived if the perpetrator (investigator) is granted a pardon and amnesty by the victim or the victim’s family, typically through the payment of *diyat* (monetary compensation). The payment of *diyat* should be made willingly and respectfully, without coercion, and in a timely manner without delay. Furthermore, the author affirms that physical abuse is categorically forbidden in Islam, as one of the main objectives of Islamic law (*maqasid al-shari‘ah*) is to protect human welfare both in this world and in the Hereafter. Given the aforementioned explanation, if abuse does occur, the appropriate penalties under Islamic law may include

qishash and/or diyat, depending on the nature and severity of the act committed by the perpetrator against the victim.

C. Forms of Legal Enforcement Against Police Officers Who Commit Physical Violence During Investigation

According to data from the Commission for the Disappeared and Victims of Violence (KontraS), between July 2005 and June 2006, there were 140 recorded cases of similar incidents across Indonesia. Further notable cases include the deaths of Tjetje Tadjuddin in Bogor and Ahmad Sidiq in Situbondo during investigations in 2007; the case of Maftuh Fauzi, a student from the National University, who died as a result of violence on May 24, 2008; and the cases of Rimsan and Rostin in Gorontalo between May and June 2008, where the suspects were coerced into confessing to the murder of a child, despite not being the actual perpetrators, resulting in wrongful criminal convictions. Additionally, research by the Jakarta Legal Aid Institute (LBH Jakarta) also revealed that violent acts by investigators during interrogations remain prevalent in the jurisdiction of the Jakarta Metropolitan Police.⁽¹⁵⁾ Several cases of investigator-perpetrated violence remain unresolved, with some not having reached any clear legal conclusion, including the widely cited case of Marsinah's death.

Acts of violence committed by investigators against suspects are typically carried out under the guise of "coercive measures." Under the Indonesian Criminal Procedure Code (KUHAP), there is no explicit, descriptive definition of coercive measures. However, coercive measures are generally understood as the delegation of authority to law enforcement officers, granted by statutory regulations, to restrict a person's liberty.

These coercive actions include arrest, detention, search and seizure, and document examination—all of which fall under the procedural framework of criminal investigations. When conducted without adherence to statutory regulations, even under ostensibly normal or stable circumstances, such measures may constitute violations of human rights—particularly in relation to individual freedoms.

The formal legal basis for arrest procedures is articulated in Article 18 of KUHAP, which states:

- (1) The implementation of arrest shall be carried out by officers of the Indonesian National Police, who must present an assignment letter and an arrest warrant identifying the suspect and stating the reason for arrest, along with a brief explanation of the alleged offense and the place of interrogation.
- (2) In cases where an arrest is made without a warrant, the arresting officer must immediately surrender the suspect and any accompanying evidence to the nearest investigator or assistant investigator.
- (3) A copy of the arrest warrant as referred to in paragraph (1) must be provided to the suspect's family immediately after the arrest.

From this article, several important points emerge regarding investigative conduct. First, investigators must present an official assignment letter that clearly identifies both the suspect and the reason for arrest, and introduce themselves properly—especially in normal, non-violent situations where the suspect does not resist or threaten with a firearm. Second, this presentation of credentials aims to establish a level of trust and transparency between the investigator and the suspect. Third, the family or next of kin of the suspect must be informed promptly after the arrest. Fourth, these requirements aim to ensure the suspect's sense of security and to prevent the violation of their rights as a subject in the legal process.

Furthermore, the principal duties of the Indonesian National Police (POLRI) are outlined in Article 13(b) of Law No. 2 of 2002 on the Indonesian National Police. In order to fulfill these duties, Article 16(1) of the same law grants POLRI the following powers:

- a. to conduct arrests, detentions, searches, and seizures;
- b. to limit access to and from crime scenes for investigative purposes;
- c. to escort and present individuals for questioning;
- d. to order suspects to stop and verify their identity;
- e. to examine and confiscate correspondence;
- f. to summon individuals for questioning as suspects or witnesses;
- g. to engage expert witnesses in case analysis;
- h. to terminate investigations;
- i. to forward case files to public prosecutors;

- j. to issue immediate requests to immigration authorities in urgent or unforeseen circumstances to prevent the escape of suspects;
- k. to supervise and assist civil service investigators, and to forward the results of their investigations to the public prosecutor; and
- l. to perform other legally mandated actions.

The authority to carry out "other actions as mandated by law" as stated in Article 16(1)(l) is clarified in Article 16(2), which provides guidelines for the use of police discretion. Such discretionary actions are permissible only if they: (1) do not contradict existing legal rules; (2) are carried out in a harmonious and lawful manner; (3) are based on sound reasoning and fall within the officer's official scope of duty; (4) are executed under exigent circumstances; and (5) respect human rights.

Moreover, investigative conduct is governed by clear rules and limitations under Article 11(1) of the Chief of National Police Regulation No. 8 of 2009 on the Implementation of Human Rights Principles and Standards in Police Duties. This article states:

(1) All police officers are strictly prohibited from engaging in the following actions:

- a. unlawful and arbitrary arrest and detention;
- b. torture of detainees or suspected criminals;
- c. sexual harassment or violence against detainees or suspects;
- d. punishment or treatment that is degrading or inhumane;
- e. corruption or acceptance of illicit payments;
- f. obstruction of justice or concealment of criminal acts;
- g. unlawful corporal punishment;
- h. mistreatment of individuals who report human rights violations;
- i. illegal search and seizure; and
- j. excessive use of force and/or firearms.

In line with Article 11(2) of the same regulation, if a police officer engages in violent acts or violates human rights, accountability must be upheld in accordance with prevailing regulations, ethical standards governing police conduct, and applicable legal frameworks.

CONCLUSION

Based on the discussion above, it can be concluded that during the investigation process, suspects also possess certain legal rights as stipulated under the Indonesian Criminal Procedure Code (KUHAP), including the right to legal assistance. In principle, the existing legal framework regarding the protection of suspects from acts of violence committed by investigators is sufficiently comprehensive from a formal legal standpoint. However, in practice, its implementation remains inadequate due to the tendency of law enforcement to apply an inquisitorial system and disregard the presumption of innocence.

From the perspective of *fiqh jinayah* (Islamic criminal jurisprudence), legal protection for victims of severe abuse committed by investigators is addressed through two types of sanctions: *qishash* (retaliatory punishment) for intentional acts of severe violence, and *diyat* (financial compensation) for unintentional acts. In cases where such violence leads to death, the penalty for the perpetrator—if found to be deliberate—is *qishash*. However, if the family of the deceased grants forgiveness and amnesty, the investigator is instead obligated to pay *diyat* as a compulsory sanction.

In terms of legal enforcement, the police authority may implement pre-emptive, preventive, and repressive legal measures against investigators who commit acts of physical violence during investigations. a) Pre-emptive legal measures may involve conducting awareness programs and providing education on the harmful consequences of violent conduct, as well as emphasizing the importance of upholding the presumption of innocence. These programs should be targeted at police cadets and active officers. b) Preventive legal measures may include issuing formal warnings to investigators who engage in violent conduct against suspects. c) Repressive legal measures serve as a last resort when preventive measures are ignored. In such cases, the offending investigator may be subject to disciplinary actions by the Police Professional and Security Division (Bidpropam). If the investigator is found guilty in a criminal court for acts of violence committed during the investigation process, the police authority may proceed with termination of employment and revocation of police membership through a code of ethics tribunal, in accordance with Law No. 2 of 2002 concerning the

Indonesian National Police.

REFERENCES

1. Mustofa M. Kriminologi: Kajian sosiologi terhadap kriminalitas, perilaku menyimpang, dan pelanggaran hukum. Prenada Media; 2021. 6 p.
2. Jalil, A. A., Said, M., & Menne F. Perilaku Bullying Siswa SMP Negeri 1 Nuha Kabupaten Luwu Timur. *Bosowa J Educ* [Internet]. 2022;2(2):164–70. Available from: <https://doi.org/10.35965/bje.v2i2.1487>
3. Tumon MBA. Studi Deskriptif Perilaku Bullying pada Remaja. *J Pengabdian Din* [Internet]. 2014;3(1):17. Available from: <https://journal.ubaya.ac.id/index.php/jimus/article/view/1520/1239>
4. Karna MA, Saragih YM, Ismaidar I, Zarzani TR. Implementasi Peran Polri dalam Penindakan Penyidik yang Melakukan Kesalahan Prosedur Penyidikan (Studi di Polda Sumut). *JIP - J Ilmu Ilmu Pendidik*. 2024;7(1):908–20.
5. Kurnianingsih M, Attirmidzi MZ. The Effectiveness of Imposing the Death Penalty for Corruption Perpetrators as a Solution for Handling Corruption during the Covid-19 Pandemic. *Law Justice*. 2021;6(1):80–95.
6. Muhaimin M. Metode Penelitian Hukum. Dalam S. Dr. f, Metode Penelitian Hukum. Mataram; 2020. 18 p.
7. Sari, W., & Hartanto SH. Pertimbangan Hakim dalam Memutus Perkara Tindak Pidana Kekerasan Seksual Terhadap Anak (Studi Putusan Nomor: 39/Pid. Sus/2021/PN Pwd) [Internet]. Universitas Muhammadiyah Surakarta; 2022. Available from: <https://eprints.ums.ac.id/100972/>
8. Zuhdi S, Kuswardani, Prakosa AL, Kurnianingsih M, Astuti W, Rahman RA. Domestic violence as a consequence of nusyuz under the islamic law and legislation of Indonesia. *Humanit Soc Sci Rev*. 2019;7(2):340–8.

9. Aripin Z. Implementation Of Laws On The Criminal Jurisdiction System Using A Restorative Justice Approach (A Case Study at ‘Aisyiyah Legal A id Institute, Central Java). *Law Justice*. 2020;5(2):145–60.
10. Shanty Saleh IN, Spaltani BG. Environmental Judge Certification in an Effort to Realize the Green Legislation Concept in Indonesia. *Law Justice*. 2021;6(1):1–18.
11. Putrajaya NS. Tinjauan Yuridis Terhadap Pelaksanaan Asas Praduga Tak Bersalah Dalam Proses Peradilan Pidana. *DIPONEGORO LAW J [Internet]*. 2016;5(4):13. Available from: <https://ejournal3.undip.ac.id/index.php/dlr/article/view/13759>
12. Erniyati T. Extrajudicial Killing Terhadap Terduga Pelaku Tindak Pidana Terorisme Dalam Perspektif Asas Praduga Tak Bersalah. *Badamai Law J*. 2018;3(1):99.
13. Remaja ING. Penerapan Asas Praduga Tak Bersalah Bagian dari Perlindungan Hak Asasi Manusia yang Harus Dijamin oleh Negara. *Kertha Widya [Internet]*. 2018;6(1):8–19. Available from: <https://ejournal.unipas.ac.id/index.php/KW/article/view/491>
14. Santoso T. *Asas-asas hukum pidana Islam*. Jakarta: PT Raja Grafindo; 2016. 196 p.
15. Jonathan A, Gurning EH, Yonesta F, Gatot, Bellasati KA, Hidayat N, et al. *Mengungkap Kejahatan Dengan Kejahatan*. 2008. 1–136 p.