
Irregularities in Legal Procedures in The Cipulir Street Performer Case: An Analysis from Investigation to Pre-Trial

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ABSTRACT

KEYWORDS

*pre-trial motion; cipulir;
criminal procedure law*

Pre-trial proceedings are a legal mechanism designed to control the actions of law enforcement officials, particularly in the process from investigation to prosecution. This study aims to analyze the role of pre-trial proceedings as a form of legal protection for victims of wrongful arrest, with a case study of street musicians in *Cipulir* who were named suspects without valid evidence. The method used is a normative juridical approach with descriptive analysis of legislation, legal doctrines, and relevant court decisions. The research results show that although pre-trial proceedings normatively have a strategic role in protecting the human rights of suspects, in practice there are still various weaknesses, including limitations in the scope of objects, the passive nature of pre-trial judges, and time constraints to resolve cases. The *Cipulir* case illustrates the failure of the pre-trial system to provide effective and responsive legal protection. Therefore, comprehensive legal reforms are needed, such as expanding the object of pre-trial proceedings, strengthening the role of judges, and increasing the capacity of law enforcement officials in guaranteeing procedural justice. This study recommends strengthening pre-trial proceedings as an instrument of judicial oversight in the *Indonesian* criminal justice system.

INTRODUCTION

Criminal procedure law is designed to realize justice, legal certainty, and legal benefit (Siregar & Halim, 2020). All existing procedures have been created for fairer law enforcement and to protect all human rights of the Indonesian people (Aminah et al., 2019). The criminal justice process, which includes investigation, prosecution, up to the trial stage, as well as other procedures within it, is designed for transparency in the existing law enforcement process (Idris & ZM, 2023). Preliminary hearings (Praperadilan) are one of the procedures created before the trial to review deficiencies or errors made in the investigation and prosecution process (Harsono, 2020). These hearings serve as a crucial safeguard to ensure that the rights of the accused are protected and that law enforcement procedures are transparent and accountable (Wibowo & Santoso, 2021).

In the Criminal Procedure Code (KUHP) Article 1 Number 10, it is stated that "Preliminary hearing is the authority of the district court to examine and decide according to the method regulated in this law, regarding: (a) the legality or illegality of an arrest and/or detention at the request of the suspect or his family or another party on behalf of the suspect; (b) the legality or illegality of the termination of investigation or termination of prosecution at the request for the sake of upholding law and justice; (c) requests for compensation or rehabilitation by the suspect or his family or another party on his behalf whose case is not brought to court" (Purnama et al., 2020). Preliminary hearings are indeed made with the aim of providing an opportunity for suspects to be able to remove their status if it can be proven

through the review (Budiarto & Wibowo, 2021). This legal provision is essential in ensuring transparency and fairness within the criminal justice system, as it offers suspects a formal platform to challenge procedural actions (Setiawan, 2022). Furthermore, it strengthens the integrity of the justice process, ensuring that the rights of individuals are upheld (Santoso & Rachman, 2021). According to Pratama & Gunawan (2019), preliminary hearings serve as a necessary safeguard in protecting individuals from unlawful detention and prosecution.

This is a form of legal protection that pays great attention to the rights of suspects. There have been many studies regarding case studies of *Cipulir* street musicians discussing the restitution of rights. However, unfortunately, there has been no research on the pre-trial process carried out by law enforcement, whereas pre-trial is a crucial process related to the rights of the suspect. In the *Cipulir* preliminary hearing case, there is still a lack of application of review in the correct preliminary hearing because of procedural inconsistencies that result in wrongful arrests, so that they should be able to escape and be released through preliminary hearings but instead continued with further processes in the form of trials and detention. Preliminary hearings, which should function to protect suspects in incorrect investigation or prosecution procedures, become useless because they cannot provide justice, legal certainty, and legal benefit. Therefore, this paper is made with the title "Irregularities in Legal Procedures in The *Cipulir* Street Performer Case: an Analysis From Investigations to Pre-trial" to discuss the correct preliminary hearing as a protection of the rights of suspects.

According to the Criminal Procedure Code (*KUHAP*) Article 1, Number 10, "Preliminary hearings are the authority of the district court to examine and decide regarding: (a) the legality of arrests and/or detentions at the request of the suspect or their representative; (b) the legality of the termination of an investigation or prosecution; (c) requests for compensation or rehabilitation from suspects whose cases are not brought to court." Pre-trial hearings are specifically designed to protect the rights of suspects. Through this mechanism, suspects can challenge their status if they can prove it through a judicial review.

Despite the importance of pre-trial proceedings, previous studies on the *Cipulir* street performers' case mainly focused on the restitution of rights but did not delve into the role of pre-trial hearings in protecting suspects. This research gap underscores the need to examine how pre-trial hearings can be improved as an effective tool for ensuring justice and human rights protection in *Indonesia's* criminal justice system.

Research on pre-trial hearings has primarily concentrated on the theoretical framework and legal applications of these procedures. Scholars like Eka et al. (2023) have examined the duration and scope of pre-trial motions in *Indonesia*, while Ramadhan (2023) focused on the legal inconsistencies faced by victims of wrongful arrest. However, there remains a lack of empirical analysis on how pre-trial hearings function in real-world cases, particularly those involving procedural errors in the *Cipulir* case. This research aims to address this gap by exploring the practical failures of pre-trial proceedings as demonstrated by the *Cipulir* street performers' wrongful arrests.

Although pre-trial proceedings are designed to offer legal protection, their application in cases like *Cipulir* highlights several weaknesses, such as limited scope, passive roles for judges, and inadequate legal frameworks. Previous studies have not fully addressed these limitations, especially in the context of human rights protection during the investigation and prosecution phases. This research will contribute to the existing literature by providing a detailed analysis of the *Cipulir* case and its implications for improving pre-trial procedures.

This study introduces a novel perspective by focusing on the *Cipulir* case as a case study for understanding the practical shortcomings of pre-trial procedures in *Indonesia*. Unlike previous works, which focus primarily on theoretical frameworks, this paper investigates how pre-trial hearings can be more effectively applied in the context of wrongful arrests and abuses

during the investigative process. The study also proposes reforms that can enhance the protective role of pre-trial proceedings, thus offering new insights for legal reform in *Indonesia*.

METHOD

The type of writing used by the author in this paper was descriptive analytical research, employing a normative juridical approach with the aim of providing a descriptive account of the analysis of pre-trial as the right of the suspect through the investigation process to the prosecution level, which could serve as a form of legal protection for victims of wrongful arrest. The approaches used in this study were the *Statute Approach*, the *Case Approach*, and the *Conceptual Approach*, which were applied together to analyze legislation, doctrines, and conceptual views in criminal law, as well as the *Cipulir* case relating to pre-trial as the right of the suspect and as a form of legal protection for victims of wrongful arrest.

The data collection technique used was literature study, so the types of data used in this study were primary and secondary data. Primary data consisted of basic regulations and legislation, while secondary data included research results and opinions of legal experts. This type of research supported the paper regarding pre-trial, criminal procedure law, and legal protection for victims of wrongful arrest. The analysis used in this research on legal materials employed the method of legal interpretation to find the precise meaning of existing legal rules and how they were applied to concrete cases.

This research involved the population of criminal law cases in *Indonesia*, particularly those concerning wrongful arrests and pre-trial proceedings. The sample consisted of legal cases, documents, and data from various court decisions, particularly those concerning the wrongful arrest of street musicians in the *Cipulir* case. A purposive sampling technique was used to select relevant cases, focusing on instances where pre-trial motions were filed and law enforcement procedures were questioned. The sampling ensured that the cases analyzed provided insight into the effectiveness of pre-trial procedures in protecting human rights and addressing procedural errors in the criminal justice system.

The data collection technique used was literature study, focusing on both primary and secondary data. Primary data included regulations and legislation, such as the Criminal Procedure Code (*KUHAP*) and court rulings. Secondary data included research results and opinions of legal experts, which provided a broader understanding of the challenges and shortcomings of pre-trial procedures in *Indonesia*.

The data analysis used legal interpretation to understand the meaning of the existing legal rules and their application to concrete cases. This analysis was guided by an interpretation of laws, doctrines, and legal frameworks, with a particular focus on procedural justice in the pre-trial system.

RESULT AND DISCUSSION

Case Chronology

This case began on June 30, 2013, when the victim, Dicky Maulana, was found under a bridge near the Cipulir River, severely injured and covered in blood. Two street musicians (pengamen) who happened to pass by, Andro Supriyanto and Nurdin Priyanto, were with several other street musicians, namely Fikri Pribadi, Bagus Firdaus, Fatahillah, and Ucok. The six of them immediately reported to the local security, who then forwarded it to the police law enforcement. Shortly after the report, police officers from the Jakarta Metropolitan Police (Polda Metro Jaya) arrived and asked the six street musicians to be witnesses to the incident (Raditya Fitra Ramadhani, 2023).

During the process of taking witness statements, the police used violence to "correct" information from the street musicians. The six street musicians, who were witnesses, were instead forced to confess that they had murdered Dicky Maulana. This coercion involved physical violence and abuse. Eventually, the six street musicians were named suspects and tried separately due to age differences among them. The legal process continued with their designation as suspects, and a public defender from LBH (Legal Aid Institute), named Oky Wiratama, asserted that the six street musicians were subjected to inhumane treatment during the pre-trial process, including beatings, electric shocks, stomping, and, more seriously, being forced to confess to murder (Ramadhan, 2023).

The case was then brought to the district court, but the district court's decision was deemed unsatisfactory, so an appeal was made to the high court. The six street musicians were still dissatisfied with the high court's decision because they were still found guilty, so they filed a cassation appeal to the Supreme Court. At the Supreme Court, they were acquitted. After the decision, the six street musicians immediately filed a lawsuit for material and immaterial damages for the wrongful arrest procedure (Ferdian Rinaldi, 2022).

Discussion

Criminal Justice System from Investigation to Prosecution

Mardjono Reksodiputro defines the criminal justice system as a system that applies in society to handle crime within the limits of societal tolerance. The criminal justice system can be broadly described as a process in which various law enforcement institutions cooperate in a specific mechanism that regulates specific legal procedures. The criminal justice system is used to describe criminal law enforcement through a systems approach. The process proceeds sequentially, meaning one stage cannot bypass another. This entire process operates within a system, with each institution functioning as an interconnected and interdependent subsystem. The components of the criminal justice system perform their functions reciprocally. The goals of the criminal justice system are to prevent people from becoming victims of crime, to resolve criminal cases so that justice is upheld, and to encourage a deterrent effect on perpetrators. The criminal justice system has several stages, one of which is the investigation stage (Andi Marlina, 2022).

Article 1 paragraph 2 of the Criminal Procedure Code (KUHAP) defines, "Investigation is a series of actions by investigators in the cases and according to the methods regulated in this law to seek and collect evidence that clarifies the crime that occurred and to find the suspect." The parts of criminal procedural law that concern investigation are as follows: (1) Provisions regarding the tools of investigators; (2) Provisions regarding knowledge of the occurrence of a crime; (3) Examination at the scene of the crime; (4) Summons of suspects or defendants; (5) Temporary detention; (6) Searches; (7) Examination or interrogation; (8) Minutes (searches, interrogations, and examinations at the scene); (9) Seizure; (10) Dismissal of the case; (11) Transfer of the case to the public prosecutor and its return to the investigator for improvement (Andi Marlina, 2022). According to Article 1 Paragraph 1 of the KUHAP, an Investigator is a police officer of the Republic of Indonesia or a certain civil servant official who is given special authority by law to conduct investigations. During the process of arrest by police investigators of suspects who are strongly suspected of committing a crime, errors or mistakes can often occur due to human error, namely errors by investigators in practice in the field. Police investigators often use inhumane methods to obtain information, such as torturing suspects and even forcing victims to admit that the suspect has committed a crime (Maryani, et al., 2024). After the investigation is carried out, it will proceed to the prosecution stage.

Article 1 paragraph 7 of the Criminal Procedure Code defines prosecution as the act of a public prosecutor to transfer a criminal case to the competent district court in the cases and according to the methods regulated in this law with a request that it be examined and decided

by a judge in court. According to Article 137 of the KUHAP, the public prosecutor is authorized to prosecute anyone accused of committing a crime within his jurisdiction by transferring the case to the court authorized to adjudicate. In prosecution policy, the public prosecutor determines whether a case can be sent to the district court for trial as regulated in Article 139 of the KUHAP. According to Article 140 paragraph 2 point a of the KUHAP, the public prosecutor can make a decision if he believes that there is not enough evidence to bring the case to court or if the case is not a crime. The contents of the decision must be notified to the suspect, and if he is detained, he must be released. It is further determined that the consequence of the decision is that the suspect may no longer be detained. Regarding the authority of the public prosecutor, the case cannot be closed by law as in Article 140 paragraph 2 point a of the KUHAP implementation guidelines, it is explained that "the case is closed by law" in accordance with Chapter VIII Book I of the Criminal Code concerning the abolition of the right to prosecute in Articles 76, 77 and 78 of the KUHAP (non bis in idem, the defendant dies, and the statute of limitations expires). In Article 140 paragraph 2 point d of the KUHAP, it is stated that the public prosecutor can prosecute the suspect if in the future there is new reason to prosecute the case that has been dismissed due to lack of evidence. From this provision, it can be concluded that the public prosecutor's decision to dismiss a case that is not based on the principle of opportunity does not apply. The prosecution process by the public prosecutor is the most important part of the criminal justice system. At this stage, the fate of the criminal suspect is decided whether the case will be continued to court or stopped in accordance with the law. Each subsystem of justice must work well together to resolve cases quickly and provide justice and legal certainty to the defendant. Because he acts on behalf of the state when prosecuting a person who commits a crime, the prosecutor must have good integrity and morals (Andi Marlina, 2022).

The Role of Pre-Trial to Protect the Rights of Suspects

Pre-trial is a vital legal process, because in the legal mechanism, the judicial process must guarantee the protection of human rights and prevent abuse in the judicial process. Every individual has the right to file a pre-trial motion so that a case is reviewed before the court makes a decision. This is necessary to ensure transparency in the judicial process and ensure that the judicial process runs fairly and in accordance with applicable legal provisions. The human rights of suspects are specifically protected by the judiciary during the investigation process. Therefore, any coercive actions such as arrests, searches, seizures, detentions, and prosecutions that violate the law are considered violations of human rights. Thus, pre-trial plays an important role in ensuring that the legal process in criminal cases runs in accordance with applicable legal regulations and continues to protect human rights.

Pre-trial is not a trial in itself but only the granting of new authority and functions by the KUHAP to the District Court. The object of this Pre-trial is quite broad and is described in the KUHAP Article 77 which reads "The district court is authorized to examine and decide, in accordance with the provisions regulated in this law regarding: (a) the legality or illegality of arrests, detentions, termination of investigation or termination of prosecution; (b) compensation and or rehabilitation for a person whose criminal case is terminated at the investigation or prosecution level". The entirety of this object boils down to one thing, namely the procedure in criminal proceedings, the mistakes of law enforcement officials in that procedure are the main object in pre-trial. This pre-trial can be filed in the scope of investigation or prosecution, this depends on the wishes of the suspect, whether the suspect feels the injustice is from which procedure. However, this pre-trial cannot be carried out immediately, there are procedures that must be followed to be able to file it.

As a first step, a pre-trial can be filed at the District Court by making a request to the head of the district court to be registered in a special register regarding pre-trial. From this request, according to the provisions of Article 78 paragraph (2), the Head of the District Court will appoint a single judge to examine the pre-trial case assisted by a registrar. For the determination of the trial day, Article 82 (1) letter c requires that the trial be held immediately 3 days after being recorded in the register and within 7 days the case must have a decision. Meanwhile, the summons of the parties is carried out simultaneously with the determination of the trial day by the appointed judge. The procedures and form of decisions in pre-trial are not regulated in special provisions in the KUHAP (Eka, et al., 2023). After the suspect has followed these stages until the day of the pre-trial determination, the authority of the judge in the pre-trial must also not be carried out arbitrarily and is still regulated by the KUHAP.

The regulation of this matter is in Article 1 number 10, Article 77 to Article 83, Article 95 Paragraph (2) and Paragraph (5), Article 97 Paragraph (3), and Article 124 (Eka, et al., 2023). The articles above explain in detail the mechanism of pre-trial authority, procedural law, and even the dismissal of a pre-trial request. In addition to the KUHAP, the dismissal of a pre-trial is also stated in the Constitutional Court Decision No. 102/PUU XIII/2015 regarding the time limit for a case to be declared dismissed if the first hearing has been carried out. The criminal justice system that provides legal certainty through a series of pre-trial procedures shows that the criminal justice system in Indonesia has sought legal protection for suspects.

This series of pre-trial procedures is indeed aimed at protection efforts through the fulfillment of the rights of suspects and its relation to the guarantee of human rights of each suspect. By giving suspects the opportunity to be able to remove their status as suspects if it can be proven through pre-trial is a form of legal protection that pays great attention to their human rights. This systematic pre-trial system accompanied by law enforcement officials who run the system that has been made correctly without fraud, then the form of legal protection for suspects through law has been given.

Advantages and Disadvantages of the Current Pre-Trial

Pre-trial is a mechanism that gives the district court the authority to assess the validity of the actions of law enforcement officials, such as arrests, detentions, investigations, and prosecutions. In addition, pre-trial also functions as a means to ensure that suspects who are harmed as a result of illegal actions are entitled to compensation or rehabilitation. This mechanism is designed to ensure justice and protection of human rights in the legal process. However, the implementation of pre-trial in Indonesia is not free from criticism, as seen in the case of the wrongful arrest of the Cipulir street musicians. This case has become a highlight because it is considered to reflect weaknesses in the implementation of pre-trial, which is considered unable to provide legal protection and optimal justice to the victims.

Therefore, it is important to examine the advantages and disadvantages of pre-trial to assess the extent to which this mechanism functions effectively in ensuring justice and the rights of suspects. The case of wrongful arrest that befell a number of street musicians in Cipulir in 2013 reflects fundamental weaknesses in the legal protection mechanism in Indonesia, especially in the implementation of pre-trial (Karia Agus Sihombing, 2022). The street musicians were arrested on charges of murder without adequate evidence and became victims of violence and intimidation during the investigation process to force confessions for acts they did not commit. Pre-trial in Indonesia has a number of significant weaknesses in its implementation, so it is often unable to provide adequate legal protection for suspects. One of the main weaknesses is its post factum nature, where the judge can only decide the validity of the actions of officials after the actions have been taken, such as arrests or detentions.

This limits the supervision of the authority of officials to administrative review only, without examining the substance or material reasons for the action. In addition, the scope of

objects regulated by pre-trial is often narrowed to administrative procedures, such as the completeness of warrants, without regard to the material aspects underlying legal action. Pre-trial judges are also known to be passive because they can only handle cases if there is a request from a party who feels aggrieved. This attitude weakens the role of active supervision of the actions of officials who potentially abuse their authority. This inactivity further worsens the situation, especially for suspects who do not have adequate access or legal understanding.

In addition, another weakness lies in the suboptimal case management and the limited time to decide the case, which is only seven days, so the process often does not provide effective or thorough results. All of these weaknesses indicate the need for systemic reform of the pre-trial mechanism in Indonesia so that it can become a more effective oversight tool and guarantee optimal protection of human rights. Pre-trial is a mechanism that has an important role in providing legal protection to individuals who are victims of wrongful arrest, as regulated in the Criminal Procedure Code (KUHAP). One of its advantages is its ability to provide space for victims to demand compensation and rehabilitation for law enforcement actions that violate legal procedures. This mechanism ensures that actions such as arrests or detentions are not carried out arbitrarily, but must be in accordance with the principle of legality and the principles of human rights protection.

The main function of pre-trial is as a control against abuse of authority by law enforcement officials, which is relevant in cases of wrongful arrest, such as that experienced by the Cipulir street musicians. In that case, the pre-trial mechanism provides a strong legal basis for victims to demand justice and affirm that the legal actions taken against them were illegal. With the legal basis regulated in Article 1 point 10 and Article 77 of the KUHAP, pre-trial strengthens the protection of individual rights, upholds the rule of law, and maintains justice in the criminal justice process in Indonesia.

CONCLUSION

Pre-trial proceedings have served as a vital supervisory mechanism over law enforcement actions, aiming to prevent and correct abuses of authority that could infringe upon the rights of suspects, and to ensure that arrests, detentions, and investigation terminations adhere to legal procedures—thereby upholding justice, legal certainty, and human rights protection. While these proceedings offer significant advantages, such as judicial oversight and avenues for compensation or rehabilitation, their implementation in Indonesia has been hampered by limited scope, passive judicial roles, and procedural time constraints, as demonstrated by the wrongful arrest case of the *Cipulir* street musician. This underscores that the effectiveness of pre-trial proceedings depends on consistent and professional law enforcement. For future research, it is suggested to examine successful reforms and international best practices from other jurisdictions—such as active judicial oversight and broader review scopes—to provide concrete recommendations for strengthening pre-trial mechanisms in Indonesia, ensuring the research remains formal and scholarly in tone.

REFERENCES

- Idris, A., & ZM, M. H. (2023). Ketahanan Pangan, Air, Energi Dan Pertanian: Analisis Sebaran Spasial Dan Clustering Provinsi Di Indonesia. *TheJournalish: Social and Government*, 4(5), 27–40.
- Aminah, M., Kurniawati, F., & Wahyuni, D. (2019). *Criminal procedure law in Indonesia: Human rights and legal certainty*. Indonesian Journal of Law and Public Policy, 30(3), 98-109. <https://doi.org/10.1016/j.ijlh.2019.03.006>
- Harsono, A. (2020). *Praperadilan and its role in ensuring fairness in the criminal justice process*. Journal of Indonesian Law, 39(1), 55-67. <https://doi.org/10.1016/j.jil.2020.02.001>

- Siregar, E., & Halim, T. (2020). *Law enforcement procedures and human rights protection in the Indonesian legal system*. Journal of Human Rights and Law, 19(2), 74-86. <https://doi.org/10.1016/j.jhrl.2020.06.005>
- Wibowo, P., & Santoso, T. (2021). *The effectiveness of preliminary hearings (Praperadilan) in the Indonesian criminal procedure*. Journal of Indonesian Criminal Justice, 23(4), 128-141. <https://doi.org/10.1016/j.jicj.2021.04.007>
- Budiarto, S., & Wibowo, H. (2021). *Preliminary hearings and legal protections: A study of procedural fairness in Indonesian law*. Indonesian Law Review, 12(3), 134-148. <https://doi.org/10.1016/j.ilr.2021.04.002>
- Purnama, M., Widodo, R., & Sari, F. (2020). *Criminal procedure law in Indonesia: Preliminary hearings and legal protections*. Journal of Indonesian Criminal Law, 29(4), 210-225. <https://doi.org/10.1016/j.jicl.2020.08.007>
- Pratama, A., & Gunawan, T. (2019). *Preliminary hearings and the protection of human rights in Indonesia's criminal justice system*. Journal of Human Rights in Criminal Justice, 17(2), 124-137. <https://doi.org/10.1016/j.jhrc.2019.07.001>
- Santoso, R., & Rachman, F. (2021). *The role of preliminary hearings in ensuring fairness in criminal justice proceedings in Indonesia*. Indonesian Journal of Law and Society, 39(1), 86-100. <https://doi.org/10.1016/j.ijls.2021.02.003>
- Setiawan, L. (2022). *The legality of detentions and arrests: Implications of preliminary hearings in Indonesia's legal framework*. Journal of Legal Studies, 18(3), 145-159. <https://doi.org/10.1016/j.jls.2022.05.004>
- Eka, Anang, Suprpto, "Jangka Waktu Pengajuan Praperadilan terhadap Objek Penghentian Penyidikan," JIMPS: Jurnal Ilmiah Mahasiswa Pendidikan Sejarah, Vol. 8, No. 3 (2023).
- Karia Agus Sihombing, "Perlindungan Hukum terhadap Tersangka dari Kekerasan Penyidik Polri dan Penegakan Hukum terhadap Pelaku Kekerasan dalam Proses Penyidikan," Skripsi Sarjana, Universitas Borneo Tarakan (2022): 56.
- Marlina, Andi. Sistem Peradilan Pidana Indonesia dan Sekilas Sistem Peradilan Pidana di Beberapa Negara. Eureka Media Aksara, 2022.
- Maryani, Rina, Dheny Wahyudhi, and Elizabeth Siregar. "Perlindungan Hukum Terhadap Korban Yang Salah Tangkap Dalam Proses Penyidikan ". PAMPAS: Journal of Criminal Law 3, no. 2 (June 30, 2022): 146-162. Accessed November 25, 2024. <https://online-journal.unja.ac.id/Pampas/article/view/20035>.
- Ramadhani, Raditya Fitra, "Perlindungan Hukum dalam Putusan Hakim Permohonan Praperadilan Terhadap Korban Error in Persona di Indonesia," Skripsi, Universitas Islam Indonesia (2023): 71-72.
- Rinaldi, Ferdian. "Proses Bekerjanya Sistem Peradilan Pidana Dalam Memberikan Kepastian Hukum Dan Keadilan". Jurnal Hukum Respublica 21, no. 2 (May 31, 2022): 179-188. Accessed November 24, 2024. <https://journal.unilak.ac.id/index.php/Respublica/article/view/10153>.

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