



Criminal Policy Formulation on Regulation of Death Penalties for Criminal Actors

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ABSTRACT

This article is encouraging this problem solving with finding and analyzing the formulation of the criminal offense criteria to punishable by death in Indonesian criminal law and reformulation of setting the criminal offender measurement that sentenced to death from the perspective of *ius constituendum*. The article based on normative legal research by examining primary and secondary legal materials by collecting legal-materials using a card system. The analytical approach uses legislation, concepts, and comparisons. The research analysis was present in the form of descriptive analysis with evaluative, systematic, formulating, and argumentative techniques in this article. The results of this research that conducted are the Indonesian criminal law does not regulate the criminal act criteria that punishable by death so that the execution of the death penalty results in injustice to both the perpetrator, the victim, and the community. The reformulation of Indonesian criminal law shall focus on the objectives and guidelines for the punishment of perpetrators of criminal offenses punishable by death refers to the Draft Criminal Code and the involvement of the victim and the community in their interests if in the execution of capital punishment there is a change to imprisonment or life imprisonment

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1. Introduction

The imposition of the death penalty for Indonesia remains two groups of pros and cons.([Akhmaddhian, Hartiwiningsih, & Handayani, 2017](#)) Retentionist groups or those who agree have still maintained the application of the death penalty based on the argument and the basis for progressive crime using the *modus operandi* and the classification of extraordinary crimes. Meanwhile, the anti-death penalty group (abolitionist group) based on philosophical-theological humanitarian reasons by taking refuge behind the justification of human rights.([Iswantoro, Saputra, Doyoharjo, & Luthviati, 2020](#))

The most common criminal offenses in Indonesia for which the defendants still charged with the death penalty are cases of premeditated murder as regulates in Article 340 of KUHP where the act

preceded, followed and accompanied by violence following the fulfillment of elements of Article 89 of KUHP, or accompany criminal acts such as robbery, severe abuse, mutilation, rape, and others.([Triwanto & Aryani, 2020](#)) Meanwhile, the development of crimes committed by combining science and technology in the flow of globalization, such as the flow of advances in information and technology, with a correlated mode as a means of supporting unconventional crimes, appears fertile and is used by criminals with qualifications for new types of special-crimes. The form of crime as an extraordinary crime is even classified as a crime against humanity and carried out in disguise or hidden crimes.([Saputra & Najih, 2020](#))

Crimes that are classified as extraordinary criteria and require extraordinary efforts, such as the most prominent trio of "criminal acts" are narcotics crime,

not terrorism and corruption. It seems that the *dader* of the three types of criminal acts deserves sentenced to death. (Zubaidi, Pratama, & Al-Fatih, 2020) The imposition of capital punishment in Indonesia for drug and terrorism perpetrators has been running without significant obstacles. Except for the accused of corruption, Indonesia has not implemented it, even though it is available in its legislative product, in Article 2 paragraph (2) of Law Number 31 of 1999 in conjunction with Law Number 20 of 2001 concerning Eradication of Corruption Crimes. (Suryani, 2020)

The execution of the death penalty will be subject to a legal-choice between doing or not doing it, which remains a policy (discretionary power). Because doing or not doing is still a policy as revealed by Thomas R. Dye. (Iswantoro, Fatimah, Tahir, & Jaelani, 2020) The need for criminal law is to protect the interests of society at large from criminal disturbances. The function of criminal law (*premium remidium*) is to eradicate crime but still prioritizes the *ultimum remidium* principle. Almost all religions imply a philosophy of life and the final destiny of life. It related to their belief to their birth, death, fortune, and soul mate dependent by God as the Creator. Especially about the element of death that is not His will, this used as the basis for the abolitionist group (opponents) of capital punishment. (Tahir et al., 2020)

The retentionist group (agree/adhere to) the death penalty considers various things, including as a general prevention effort, an effort to frighten the prospective *dad* to committing crimes that have a high risk to other people as victims or as a socio-juridical-economic-political reason for certain extraordinary and specific crimes such as terrorism, narcotics, corruption, violence against vulnerable people such as children, women, and the elderly, especially crimes against humanity. (Ayu & Rachmi, 2019)

The formulation policy used by lawmakers in determining which criminal offense is punishable by capital punishment use a conditional selective approach. Selective means that not all criminal acts are punishable by the death penalty, but they are limited to several crimes, which legislators consider to be serious crimes. One concrete example in the KUHP, (Jatmiko, Hartiwiningsih, & Handayani, 2019) for example, the murder which is punishable by death is only for the crime of premeditated murder as regulates in Article 340 KUHP, while murder committed without prior planning/ordinary murder as regulates in Article 338 KUHP is not

punishable by the death penalty. Referring to this policy, criminal acts in the Criminal Code which are punishable by limited death penalty. (Akhmaddhian et al., 2017)

In the Draft Criminal Code, crime is essentially only one of the means to an end. Starting from such a view, first, the drafts of the Draft Criminal Code include the formulation of the purpose of punishment. (Article 54 Draft Criminal Code 2019). In identifying the punishment purposes, the concept starts from the balance of two main targets, namely "protection of the community" and "protection/fostering of individual perpetrators of criminal acts. (Kuncoro, Handayani, Muryanto, & Karjoko, 2019)

Likewise, starting from two very fundamental pillars in criminal law, namely the "legality principle" (which is the social principle) and the "culpability principle" (the humanitarian principle). In other words, the main idea regarding punishment closely related to the main ideas regarding crime, criminal acts, and criminal liability. (Jamaludin & Karjoko, 2019)

Judging from the point of view that focuses more on protecting the interests of the public, it is natural that the Draft Criminal Code still maintains the types of criminal sanctions, such as life imprisonment and the death penalty. Based on the draft Criminal Code, the death penalty is no longer one of the criminal sanctions in the criminal sanction system, as is currently in effect. The death penalty sanction is issued from the criminal sanctions and is placed separately as a type of criminal sanctions that is special or exclusive. (Hutomo & Karjoko, 2018)

The consideration for the shift in the position of capital punishment based on the premise that from the punishment purpose and the purpose of establishing/using criminal law as a means of crime policy and social policy. The death penalty is not the ultimate means (*premium remedium*) to regulate, put in order, and improve society. Capital punishment is only an exempt means and is a subsidiary in nature, which means that if other punishment models cannot reach the problem-solving of the criminal cases, then capital punishment is used. It can identify with the means of amputation or surgery in the medical field, which in essence is not the basic-drug, but only an exemplary measure as the last medicine (*ultimum remedium*). (Candrasari & Karjoko, 2018)

So that in the Draft Criminal Code 2019, there are provisions regarding the postponement of the implementation of the death penalty or conditional death penalty with a probation period of 10

years.(Leonard, Pakpahan, Heriyati, Karjoko, & Handayani, 2020) The death penalty placed as special-punishment (optional), and it is possible to postpone the execution of the death penalty (conditional death penalty). It is following the Australian proposal in the VII UN Congress on Prevention of Crime and Treatment of Offenders. Australia as a country of abolitionism (rejects / abolishes the death penalty) calls on the member countries that have not abolished the death penalty, to consider the possibility of procurement within the framework of their national legislation, a moratorium (delay) in its implementation for at least 3 (three) years, or by creating other conditions where the death penalty law is unnecessary and not enforced.(Iswantoro, Fatimah, et al., 2020)

Various expert opinions also state that the development of a new model of crime today, along with the advancement of science and sophisticated communication and information technology. It has a direct impact on the modus operandi of crime that accompanies it. Such unconventional crimes include criminal acts of corruption, terrorism, money laundering, narcotics crimes of the disappearance of people's lives, and their modes.(Ishak, Hasibuan, & Arbani, 2020)

The Draft Criminal Code 2019, in Article 66 of the Draft states that capital punishment is a special-principal crime and is always punishable by alternatives. It means that criminal decisions and actions that have obtained permanent legal force can still be changed or adjusted by considering the development of the prisoner and the purpose of the punishment. Article 89 of the Draft Criminal Code states that the execution of the death penalty can be postponed with a probation period of 10 (ten) years if the public reaction to the convicted person is not too big, the convict shows regret and hope for improvement, the position of the convicted person in participating in the crime is not very important, and there are mitigating reasons.(Triwanto & Aryani, 2020)

If the convicted person during probation shows a commendable attitude and actions, then the death penalty can be changed to a life sentence or a maximum imprisonment of 20 (twenty) years through a ministerial decree who administers the government in the field of law and human rights.(Handayani, 2013) However, if the convicted person during the probation period, as referred to in paragraph (1), does not show a commendable attitude and actions and there is no hope of

improvement, then the death penalty can be executed by order of the Attorney General.(Iswantoro, Fatimah, et al., 2020)

The positive law in Indonesia is not clear about the criteria for perpetrators who sentenced to death, or the legal norm is vague, both in general criminal law and in special criminal law. Therefore, the authors are interested in disclosing and analyzing it through the title: "Criminal Policy Formulation on Regulation of Death Penalties for Criminal Actors".(Tahir et al., 2020)

2. Results and Discussion

2.1. Criminal law formulation policy regarding death penalty sanctions in the draft criminal code

The main crimes in the Draft Criminal Code 2019 regulate in Article 60 consist of Prison Criminal, Criminalization Crime, Supervision Criminal, Fines, and Social Work Crimes. Furthermore, Article 66 states that the death penalty is principal-punishment that is specific and always punishable alternatively.(Hanum, 2020) It means that criminal decisions and actions that have obtained permanent legal force and can still be changed or adjusted by considering the development of the prisoner and the purpose of the punishment. Article 89 of the Draft Criminal Code states that the execution of the death penalty can be postponed with a probation period of 10 (ten) years.(Gunawan, 2020)

The public reaction to the convict is not too big, the convict shows regret and has hope 'to be corrected, the position of the convicted person in participating in the crime is not too important, and there are mitigating reasons. If the convicted person during probation shows a commendable attitude and action, then the death penalty can be changed to a life sentence or a maximum imprisonment of 20 (twenty) years through a decree of the minister in charge; governance in the field of law and human rights.(Nuryanto, 2019) However, if the convicted person during the probation status, as referred to in paragraph (1), does not show a commendable attitude and actions and there is no hope of improvement, then the death penalty can be carried out by order of the Attorney General. It is also in line with the criminal philosophy adopted in the Criminal Code Bill.(Nuryanto, 2019)

Based on the above provisions, the criminal policy in the form of pardon and substitution of punishment is at least in line with the two penal

philosophies contained in the Draft Criminal Code, namely: resolving conflicts caused by criminal acts, restoring balance, and creating a sense of peace in society; and relieve the guilt in the convict. On the other hand, as many as 84 countries have signed the optional protocol of the second International Covenant on Civil and Political Rights, which aims to abolish the death penalty in New York, December 15, 1989. (Luthviati, Registration, & Maret, 2020)

This protocol registered since July 11, 1991, under Number 14668 and printed in Arabic, Chinese, English, French, Russian, and Spanish. Besides, these international regulations are also open for signature at the UN Headquarters in New York by all countries that have signed the International Covenant on Civil and Political Rights. (Erina & Yanis, 2020) The entire provisions in the KUHP and outside the KUHP are not regulating the criminal offender criteria, who can be sentenced to death by a judge in a criminal trial. It has resulted in many disparities in unfair court decisions against defendants charged with capital punishment in the courts in Indonesia. (Ichlas, 2020)

2.2. Legal reconstruction requirements/criteria for criminal offenders sentenced to the death penalty in the future

In general, the basis used by the judge to impose the death penalty as a recycled ratio, such as the perpetrator's actions are classified as serious crimes, planned, carried out sadistically, preceded and followed by violence until the loss of the victim's life, these things are based on legal logic and facts. (Iswantoro, Saputra, et al., 2020) Legal facts revealed in the evidence before the court session, including anything that mitigating and incriminating for the defendant, but not detailed. These matters missed the judge's judgment. The judges have not had any guidelines for convictions and convictions so far. (Saputra & Najih, 2020)

Even this is considered haram by the judge when it included in the decision consideration, as stipulates in the Draft Criminal Code 2019 during his time as a member and head of the Criminal Code drafting team. Moreover, the application of the death penalty must be filled with caution, waiting time for a firm implementation by taking into account the behavior of the convicted person and national and international human values. (Jaelani, Handayani, & Karjoko, 2020)

Mardjono Reksodiputro also stated the same thing that the Draft Criminal Code still adopted the death penalty. According to him, capital punishment

is still necessary but not the main-punishment. (Jaelani, Ayu, Rachmi, & Lego, 2020) It must be a special-crime that is applied carefully, selectively, specifically in dangerous-cases, and must unanimously determine by the panel of judges. The Draft Criminal Code also implements what is known as a probationary death penalty or often called an alternative, initially with a ten-year waiting time. If within ten years the convict has shown a commendable act, then the death penalty shall be changed to a life sentence or maximum imprisonment of 20 years, so it has expired. (Handayani, Seregig, Prasetyo, & Gunardi, 2017)

Starting from the above viewpoint, the laws and regulations that currently form the basis for the implementation of the death penalty should renew (Handayani et al., 2017) In this reform, several criminal policies need to be included in statutory-regulations so that the death decision implementation carried out quickly, precisely, and accurately. On the other hand, if then the execution cannot be carried out, the convict, the victim, and the community have the legal means to fight for their interests. (Handayani et al., 2017)

It is to suppress the disparity in decisions that are too wide. The convict is waiting for the implementation of the death penalty that is not clear so that it creates psychological pressure for the convict and his family, and as if he was convicted twice are imprisonment and death penalty. Besides that, the development of punishment (death) in modern criminal law with a restorative justice approach currently developed in various countries, along with the weaknesses of the criminal-system based on a retributive justice approach. (Fatimah, Iswantoro, Basuki, Saputra, & Jaelani, 2020)

Criminal policies like this are essential in line with the culture and customs of the Indonesian people, which emphasize conflict resolution as a means of reconciling relations between parties and restoring a cosmos that has been disturbed by the occurrence of crimes. Therefore, sanctions for violating customary criminal law are not only corporate penalties but can be in the form of other punishments. In Part X *Pandecten van het adatrecht*, *adat* reactions, and corrections include compensation for immaterial-losses and cover for embarrassment through apologies. (Wibowo, 2020)

The policy of amnesty and reimbursement of sentences, convicts can express their desires and interests, as well as victims and their families. This policy has the greatest-benefit for the victim/family

because it directly involves the victim/family. Because so far, the criminal justice process has not directly-involved by the victim in determining the punishment for the perpetrator.(Rosidah, 2020) The interests of victims represented by the state, especially the Public Prosecutor in filing a claim (requisition), appeal, cassation, and response to the defense of the convicted person at the level of judicial review. Meanwhile, in granting clemency, victims and their families were never given space to express their views.(Karjoko et al., 2019)

Even though the victim and his family have represented by the state apparatus, especially the Public Prosecutor, it could be that the prosecution of the death penalty carried out by the Public Prosecutor is not in line with the wishes of the victim and his family. It could be that the victim's family needs other solutions that are considered better than executing the perpetrator.(Nuryanto, 2019) For example, the victim's family apologizes and requires payment of compensation from the perpetrator, which in Islamic legal terminology known as a *diyath*. Assigning a role to crime victims and their families to play a role in determining punishment for criminals is not new in the formal criminal justice system in Indonesia. It is because the Indonesian criminal justice system still recognizes the existence of a complaint offense, which determines whether or not offense prosecuted depends on the crime victim complaint existence. (Handayani et al., 2017)

Restorative justice seeks to empower interested parties, including crime victims, to find solutions for the settlement of criminal cases that benefit the parties. In the conventional criminal justice system, victims remain remanded and do not participate in criminal proceedings. Restorative justice wants to reorganize the role of such victims, from being passive and just waiting and seeing how the criminal justice system handles crimes that make them victims. Victims in restorative justice are empowered so that they have personal rights to participate in the criminal process.(Kuncoro et al., 2019)

The giving of a role to victims or their families to decide whether the death row inmate is still sentenced to death or given forgiveness with the payment of *diyath* (in Islamic law) in essence, apart from being in line with the religious values and customs adhered to by the Indonesian people, as previously stated are also in harmony with human rights values.(Sukmoro, Sulistiyono, & Karjoko, 2019) Because one of the human rights principles

related to the application of the death penalty is the remission and substitution of the death penalty, as contained in Article 6 paragraph (4) of the ICCPR.(Karjoko et al., 2019)

3. Conclusion

Based on the study and analysis of the problems presented on the theoretical basis used, this research can conclude things like the following, firstly, Indonesia's positive criminal law, both in the Criminal Code as a general rule and outside the Criminal Code as a specific rule, is not yet clear. This article also regulates the criminal act perpetrator criteria that used as a basis for law enforcers, especially judges, to impose a death penalty against a defendant who has been proven guilty in the process of proof in a criminal trial. Secondly, legal construction in criteria setting perpetrators of general crimes as well as special-crimes that are punishable by death, in the future, it is formulated as an exception to the main-criminal which is specific separate from other main crimes with special conditions as the *ratio decidendi* for law enforcers, especially judges before sentencing the defendant to the death penalty as stated in the draft. The 2019 Draft Criminal Code and provides access to victims and the public in the remission or amendment of the death penalty with imprisonment or life imprisonment in the criminal justice process.

References

- Akhmaddhian, S., Hartiwingsih, & Handayani, I. G. A. K. R. (2017). The government policy of water resources conservation to embodying sustainable development goals: Study in Kuningan, Indonesia. *International Journal of Civil Engineering and Technology*, 8(12), 419–428.
- Ayu, I. G., & Rachmi, K. (2019). 2019 Regulating Corporate Social Responsibility for State Owned Limited Liability in Indonesia. 18(5), 18–22.
- Candrasari, L. S. D., & Karjoko, L. (2018). The Principle of Social Function of Land Cultivation Right in Agritourism Accommodation in Indonesia. *International Journal of Multicultural and Multireligious Understanding*, 5(2), 271. <https://doi.org/10.18415/ijmmu.v5i2.374>
- Erina, P., & Yanis, A. M. (2020). Reconstruction of Mining Policies on Justice in Lampung Province. *Bestuur*, 8(2), 139. <https://doi.org/10.20961/bestuur.v8i2.42830>
- Fatimah, S., Iswanto, Basuki, U., Saputra, R., & Jaelani, A. K. (2020). The public policy of local government in protecting geographic indication as a leading regional product. *International Journal of Advanced Science and Technology*, 29(4), 1576–1580.
- Gunawan, S. (2020). The Principle of Control Non Primary Gun System of the Indonesian National Army Protect Soldiers. *Bestuur*, 8(2), 152.

- <https://doi.org/10.20961/bestuur.v8i2.43140>
- Handayani, I. G. A. K. R. (2013). Urgency of Regulatory Priorities Watershed in Order to Conduct an Integrated Watershed Administrative Law in Indonesia. *The First International Conference on Law, Business and Government*, 22–28.
- Handayani, I. G. A. K. R., Seregig, I. K., Prasetyo, T., & Gunardi, A. (2017). The application of article 359 of the criminal code in the investigation of the death of post-operative patients. *Journal of Advanced Research in Law and Economics*, 8(5), 1517–1525. [https://doi.org/10.14505/jarle.v8.5\(27\).15](https://doi.org/10.14505/jarle.v8.5(27).15)
- Hanum, W. N. (2020). Setting of Earth Oil Management in Old Wells Based on the Principle Social Justice. *Bestuur*, 8(2), 70. <https://doi.org/10.20961/bestuur.v8i2.42789>
- Hutomo, A. S., & Karjoko, L. (2018). Issuance Legality of the Ownership Certificate for the Riparian Area and Its Legal Consequences in Sukoharjo Regency. *International Journal of Multicultural and Multireligious Understanding*, 5(2), 239. <https://doi.org/10.18415/ijmmu.v5i2.328>
- Ichlas, R. I. (2020). Questioning the Independence of Media Coverage in the 2019 Elections. *Jurnal Bestuur*, 8(1). <https://doi.org/10.20961/bestuur.42725>
- Ishak, N., Hasibuan, R. R., & Arbani, T. S. (2020). Bureaucratic and Political Collaboration Towards a Good Governance System. *Bestuur*, 8(1), 19. <https://doi.org/10.20961/bestuur.v8i1.42922>
- Iswantoro, Fatimah, S., Tahir, A., & Jaelani, A. K. (2020). Existence of customary delict in Indonesian legislation. *International Journal of Advanced Science and Technology*, 29(4), 1571–1575.
- Iswantoro, I., Saputra, R., Doyoharjo, A., & Luthviati, R. D. (2020). The Effectiveness of the Supervision of the Prosecutor's Commission in Indonesia. *Pena Justisia: Media Komunikasi Dan Kajian Hukum*, 19(2), 144–163. <https://doi.org/10.31941/pj.v19i2.1180>
- Jaelani, A. K., Ayu, I. G., Rachmi, K., & Lego, H. (2020). *The Political Law of the Constitutional Court In Canceling the Concept of the Four Pillars as an Pancasila as the State Foundation*. 12(2), 1314–1321.
- Jaelani, A. K., Handayani, I. G. A. K. R., & Karjoko, L. (2020). Development of tourism based on geographic indication towards to welfare state. *International Journal of Advanced Science and Technology*, 29(3 Special Issue), 1227–1234.
- Jamaludin, A., & Karjoko, L. (2019). Legal Certainty of Tax Determination on acquisition Charges for Land and Building Rights (BPHTB) by Local Finance Board in Karanganyar. *International Journal of Business and Social Science*, 10(11), 69–75. <https://doi.org/10.30845/ijbss.v10n11a9>
- Jatmiko, D. R., Hartiwingsih, & Handayani, G. A. K. R. (2019). A political communication regulation model in local leaders election and legislative election for realizing a just political education. *International Journal of Advanced Science and Technology*, 28(20), 349–352.
- Karjoko, L., Jaelani, A. K., Hukum, F., Maret, U. S., Hukum, F., & Riyadi, U. S. (2019). *Jurnal Bestuur*. 7(1).
- Kuncoro, A. B., Handayani, G. A. K. R., Muryanto, Y. T., & Karjoko, L. (2019). Urgency of government protection on consumers in the concept of law. *International Journal of Advanced Science and Technology*, 28(20), 331–335.
- Leonard, T., Pakpahan, E. F., Heriyati, Karjoko, L., & Handayani, I. G. A. K. R. (2020). Legal review of share ownership in a joint venture company. *International Journal of Innovation, Creativity and Change*, 11(8), 332–345.
- Luthviati, R. D., Registration, C., & Maret, U. S. (2020). *Jurnal Bestuur*. 8(2). <https://doi.org/10.20961/bestuur.43138>
- Nuryanto, A. D. (2019). Problem Penyidikan Tindak Pidana Pencucian Uang yang Berasal dari Predicate Crime Perbankan. *Bestuur*, 7(1), 54. <https://doi.org/10.20961/bestuur.v7i1.43437>
- Rosidah, Z. N. (2020). Coherence of the Rules of Sharia Against Pancasila. *Bestuur*, 8(1), 40. <https://doi.org/10.20961/bestuur.v8i1.42723>
- Saputra, R., & Najih, M. (2020). Bantuan Hukum Cuma-Cuma Bagi Tersangka yang Tidak Mampu Pada Tingkat Penyidikan. *Pena Justisia: Media Komunikasi Dan Kajian Hukum*, 19(2), 90–106. <https://doi.org/10.31941/pj.v19i2.1119>
- Sukmoro, E., Sulistiyono, A., & Karjoko, L. (2019). The politic of law of PT. Kereta api Indonesia (persero) track access charge policy based on justice. *International Journal of Advanced Science and Technology*, 28(20), 353–361.
- Suryani, S. (2020). Nilai Moralitas dalam Pembentukan Peraturan Perundang-Undangan. *Pena Justisia: Media Komunikasi Dan Kajian Hukum*, 19(2), 117–130. <https://doi.org/10.31941/pj.v19i2.1147>
- Tahir, A., Iswantoro, Fatimah, S., Luthviati, R. D., Saputra, R., & Jaelani, A. K. (2020). The model of criminal policy to customary law society after decision of the constitutional court of the Republic of Indonesia number 95/PUU-XII/2014. *International Journal of Advanced Science and Technology*, 29(4), 1581–1589.
- Triwanto, T., & Aryani, E. (2020). The Urgency of Granting Authority to Assess Corruption Justice Collaborators. *Bestuur*, 8(1), 60. <https://doi.org/10.20961/bestuur.v8i1.42720>
- Wibowo, D. E. (2020). Ewuh Pakewuh Cultural Reconstruction to Equal Consumer Protection. *Jurnal Bestuur*, 8(1), 1–8. <https://doi.org/10.20961/bestuur.41395>
- Zubaidi, N., Pratama, R. G., & Al-Fatih, S. (2020). Legal Perspective on Effectiveness of Pre-Work Cards for Indonesian People. *Bestuur*, 8(1), 9. <https://doi.org/10.20961/bestuur.v8i1.42722>