

Analysis of Formal Errors in *Visum et Repertum* and Their Legal Consequences on the Evidential Value in Criminal Cases of Assault (Study of Decision No. 309/Pid.B/2024/PN. BJM)

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Abstract. *The criminal act of assault is a prevalent offense in society and is regulated under Articles 351 to 354 of the Criminal Code (KUHP). In the evidentiary process of assault cases, the Visum et Repertum (VER) serves a critical role as both documentary evidence and expert testimony, as specified in Articles 133 and 184 of the Indonesian Criminal Procedure Code (KUHP). However, the admissibility of VER requires compliance with both formal and substantive standards in accordance with medical and legal norms. This study examines formal defects in VER and their legal implications for evidentiary value, using Case Decision No. 309/Pid.B/2024/PN BJM as a case study. The findings reveal that the VER was issued based on a Visum Request Letter (SPV) signed by an unauthorized investigator, and its contents failed to meet the requirements of the Indonesian Medical Competency Standards (SKDI). Despite these deficiencies, the court relied on the VER as the basis for conviction, even though the case lacked two valid pieces of evidence and no witness directly observed the alleged crime. This research concludes that formal defects in VER can undermine the principles of legality and legal certainty, and may violate the defendant's fundamental rights.*

Keyword: Criminal; Persecution; Proof; Visum et Repertum.

1. Introduction

Crime remains rampant in society, with one of the most common crimes involving harm to others, namely assault. This assault often occurs due to the perpetrator's uncontrolled behavior, usually due to educational and environmental factors (Fertina Lase: 2023). The crime of assault is regulated in the Criminal Code, namely in Articles 351-354. Each article that regulates assault has different types and elements, so that in court, the public prosecutor must be able to prove elements that correspond to the conditions of the injury experienced by the victim. For example, if a person experiences assault and the injury caused by the crime matches the type of injury as outlined in Article 90 of the Criminal Code, namely the criteria for injuries that. Diseases or wounds that will not heal perfectly, cannot perform work or positions perfectly as before, loss of five senses, except the eyes and ears because other parts can still be used, paralysis, disturbed thoughts for more than 4 (four) weeks, miscarriage of the mother's biological child, then these criteria are included in serious injuries which are in accordance with the elements of serious assault in Article 354 of the Criminal Code.

In addition to fulfillment proving the elements of the crime of assault that must be proven in the trial process, the evidence used to fulfill the proof of the elements of assault also has binding provisions. The evidence must be relevant to the case being examined and made or obtained legally. The Criminal Code (KUHP), valid evidence contains two important meanings, namely the type of evidence in accordance with Article 184 of the KUHP and how the evidence was obtained (Toipul et al.: 2022, hlm. 5760–5779). Evidence will be considered legally flawed when obtained through unlawful means. Valid evidence according to Article 184 of the Criminal Procedure Code is witness testimony, expert testimony, letters, instructions, and the defendant's statement. In criminal cases that deal with cases of injury, poisoning, or death suspected of being caused by a crime, the police in their investigation will use the *Visum et Repertum* as evidence that can prove the occurrence of the crime. *Visum et Repertum* (VER) is a statement or report from a doctor regarding what he saw and found on physical evidence, a corpse, or other evidence (Barama: 2021, pp. 7). The VER evidence is based on Article 133 paragraph (1) and (2) of the Criminal Procedure Code, which explains that in the case of an investigator in the interests of justice who handles victims of injury, poisoning, or death suspected of being the result of a crime, the investigator is authorized to submit a request for expert information to a forensic medicine expert or other doctor. Paragraph (2) of the a quo Article states that the request must be made in writing and clearly state what examination, so that the doctor can answer it based on the results of the VER (Colombanus, et.al: 2025, pp. 49). Based on this, the request for a *Visum et Repertum* (SPV) will be made by the investigator based on the provisions of the agency itself. Apart from the authorized investigator, the SPV cannot make and sign the request. In addition, the examining physician, in addition to having the obligation to examine and treat the patient first, also has the authority to ensure that the VER request is in accordance with applicable provisions. Furthermore, for the VER to be fully used and have full value in evidence, the VER should contain matters that have been clearly regulated based on medical science or the Indonesian Doctor Competency Standards (SKDI).

This VER evidence will actually be used by the judge in considering the case. The defendant's guilt, and its relevance will be proven based on the testimony of the expert who examined and prepared the VER during the evidentiary stage. Therefore, the VER will be valid evidence as written evidence and expert testimony if the doctor who examined the victim is presented at trial. Therefore, VER evidence is very necessary and crucial for cases involving bodily injury (assault), poisoning, or death.

Proof is an important stage in a criminal case, proof will determine the fate of the defendant whether he really committed a crime that he was accused of, and at the proof stage the judge will seek material truth through the relationship between the evidence and other evidence (Tesalonika, et.al: 2025, pp. 2). This evidentiary stage will essentially be the place where the judge gathers the basis for imposing a criminal sentence on a case. The basis for imposing a criminal sentence is the judge's basis in deciding the defendant is guilty and imposing a sentence, this is based on Article 183 of the Criminal Procedure Code, namely the existence of 2 (two) valid pieces of evidence and the judge's conviction. If the judge does not have confidence in the defendant's guilt or is less certain, and does not find 2 (two) valid pieces of

evidence that state the material truth of the case, the judge should sentence the defendant with an acquittal (Yahya: 2019, pp. 348).

The evidence that indicated as legally flawed or formally flawed, it will raise major questions among the public, even though Indonesian law clearly regulates legal certainty and legality in criminal cases. However, in practice, judges often decide criminal cases based on formally flawed evidence, arguing that the assessment of the evidence will be left to the judge's discretion. This will undermine the principles of legal certainty and legality, which ensure the fulfillment of legal objectives and the fulfillment of the defendant's rights.

This incident occurred on the case contained in Decision Number. 309/Pid.B/2024/PN. BJM, in this decision explains that the defendant and the victim are a couple who have been in a relationship for years. The incident began on September 30, 2023, when the victim came to the defendant's house at that time the defendant was not at home, so the victim waited for the defendant at the defendant's house itself. After the defendant returned home, a fight broke out between the two due to the alleged affair committed by the defendant. The victim admitted to the police that the defendant had beaten, thrown, and almost injured the victim using a cutter, however, the defendant denied it and stated that the victim often hurt himself and had called the victim's parents to pick him up at the defendant's house, however, the victim refused to return home and still wanted to continue the fight. This fight ended with the defendant taking the victim home safely. A day later, the victim reported the defendant on the basis of assault, and a VER report was issued dated October 18, 2023, which was based on the SPV dated October 1, 2023, made by an unauthorized police officer based on his position. Meanwhile, the police report is dated October 2, 2023. This is odd, as an SPV should only be created when a police report is included in it, and the VER contained does not comply with how medical science or SKDI regulates it.

Therefore, this journal will discuss formal errors in evidence, specifically Verification Verification (VER), and how its evidentiary value is assessed by the panel of judges. This paper will explore the provisions regarding Verification Verification (VER) evidence, its status, and its evidentiary value in court. This paper aims to identify and understand the definition and provisions of Verification Verification (VER) and the legal consequences that arise if it is obtained or created in a manner inconsistent with the provisions.

2. Research Methods

The research method used was normative, namely legal research based on document studies using secondary data as the basis for examining the problem. According to Eka Sihombing and Cynthia, the normative method refers to legal norms because it is based solely on secondary data, without any primary data (Eka Sihombing, et.al: 2022, pp. 43). This research would also use a statutory regulatory approach to examine legal regulations and regulations concerning health sciences and produce answers to the research problems. The research also used a case approach to analyze problems or practices based on the cases being handled (Muhaimin: 2020, pp. 58). Literature study, or bibliographic study, and document study were used to collect data. The data was processed by interpreting the legal materials. This research,

although normative, will be supported by interview data as supplementary data to strengthen opinions based on scientific knowledge and legislation.

3. Result and Discussion

As previously explained, the evidentiary stage is the most crucial stage in a judicial process. This stage involves the public prosecutor's efforts to prove their charges against the defendant before the judge. According to Subekti, proving is the judge's effort to establish the truth of the arguments or evidence presented in a dispute. This effort will convince the judge based on those truths (Dimas B: 2023, pp. 735). To ensure that the evidence presented in court is relevant and demonstrates a causal relationship between the actions, it must be prepared and obtained in accordance with legal and other applicable provisions. For example, in Decision No. 309/Pid.B/2024/PN. BJM. The primary evidence is the *Visum et Repertum* (VER). This is because the VER will contain facts and expert testimony regarding the victim's injuries, which can be linked to the type of assault and its elements, proving the defendant guilty according to the prosecutor's charges and the judge's basis for deciding the case.

3.1. Formal Provisions for *Visum et Repertum* as Evidence of Criminal Acts of Assault

According to R. Atang Ranoemihardja, VER is a statement made by a doctor based on what has been seen and found on injured people or corpses, this statement will contain the doctor's opinion based on the knowledge he has mastered (Oktavinda: 2016, pp. 2).

Article 133 paragraph (1) and (2) of the Criminal Procedure Code explains that investigators have the authority to request information from forensic medical experts or other experts in handling cases of injury, poisoning, death, and this request must be made in writing. Although there are no clear provisions regarding VER, the provisions for VER can be found in regulations that have been ratified by the state.

About VER (SPV) request letter, the authority based on Article 133 paragraph (1) of the Criminal Procedure Code is the Investigator. The provisions regarding regular investigators are clearly stated in Government Regulation of the Republic of Indonesia Number 58 of 2010 Concerning Amendments to Government Regulation Number 27 of 1983 Concerning the Implementation of the Criminal Procedure Code, it is clearly revealed that an investigator is someone who holds the rank of second police inspector (IPDA) and has a bachelor's degree or equivalent, the regulation regarding this rank will not apply if there is no police officer in the police sector with the rank of IPDA so that the head of the police sector with the rank of non-commissioned officer can become an investigator. A prospective investigator must have experience working on investigations for at least 2 (two) years and have passed the criminal investigation development education. Therefore, an SPV made and signed by someone who does not hold the rank of investigator is not authorized to make this SPV. According to Dedi Affandi, giving his opinion regarding assistant investigators who hold the rank of at least second brigadier, according to him the most important thing is that the SPV has been signed by the authorized person or the signatory as an investigator (Dedi: 2017, pp. 2). Dedi Affandi also explained that when receiving the SPV, the examining doctor must pay attention to the origin of

the request (the requesting institution), letter number, date, subject of the examination, and the letter stamp. According to him, a stamp with the word "CHIEF" written on it can be said to be valid even if it is not signed by an investigator who meets the requirements, namely an IPDA rank (Ibid, pp. 9-10).

This opinion is not entirely wrong, but this sentence still needs to be refined that the stamp with the stamp "CHIEF" must still be considered who he acts as, if he is as if an assistant investigator then he must affix the name of the main investigator, whereas if he is as if an investigator then he must affix the name of the police chief. This was expressed by a source interview conducted by the Researcher, in this case the Researcher interviewed a police investigator AKBP Dr. Sudiyono, SH, MH who stated that basically the main investigator and the assistant investigator have the same authority based on the Criminal Procedure Code only limited to detention in which case the assistant investigator does not have the authority for this matter. Regarding the SPV made by the assistant investigator, it can only be authorized when the main investigator is not present at that time, while the SPV is as soon as possible. With the condition that in signing the document the assistant investigator must on behalf of the Police Chief whose head of the Criminal Investigation Unit (KANIT) is listed below, because the KANIT Criminal Investigation Unit is not present or absent, the KANIT is still listed as an investigator who then names and is signed by the assistant investigator who made the VER request. This is different from Decision No. 309 / Pid. B / 2024 / PN BJM, in this case the SPV was made by the BA SPKT which is in accordance with the explanation of AKBP Dr. Sudiyono, SH, MH, BA SPKT carries out a service function, so this is wrong and does not comply with the provisions. Therefore, the assistant investigator and BA SPKT have different authorities. If BA SPKT makes a document in this case the SPV, it is mandatory to include his superior, namely the KA SPKT.

Why is this delegation important? According to Criminal Expert Dr. Anang Shophan Tornado, this is because it's essentially a hierarchy within an institution, in this case the police. Including the approval or initials of an authorized official on a document serves as a form of control over the institution's products, ensuring that the document has undergone a verification and selection process that meets standards.

The examining physician can accept a medical report (SPV) at any time. This is done so that the patient, or in this case, the victim, can receive necessary medical treatment first. The doctor cannot refuse the patient, as the victim has the same rights as other healthcare patients. In practice, the SPV often arrives late and the patient has already been examined. In this case, the examination report will be referred to as a medical record and will serve as a Verification Letter (VER) once the SPV has been submitted to the hospital (Ibid, pp. 9-10).

In this case, the SPV was issued before a police report was received. This is incorrect, as issuing an SPV requires the police to comply with regulations or standard operating procedures (SOPs). If issued before a police report is received, the SPV is not within the scope of the investigation. According to criminal experts, Anang Shophan Tornado, the Criminal Procedure Code (KUHP) embodies the principle of due process of law, ensuring that each stage of the legal process follows a logical sequence and can be verified. If a Police Report is filed on October 2nd, while

an Investigation Warrant (SPV) is issued on October 1st, the SPV loses its legal legitimacy. This is because the SPV is not within the scope of the investigation as referred to in Article 1 number 2 of the Criminal Procedure Code, which is the activity of searching for and collecting evidence carried out by investigators after receiving a valid report or initial information.

Meanwhile, formal provisions regarding the *Visum et Repertum* must be adjusted to the provisions of the Indonesian Doctors' Competency Standards. Because the VER is a product of health science, therefore, the provisions regarding the VER must be based on medical science in collaboration with law. Based on health science, the VER must include the following (Oktavinda: Op. Cit, pp. 12-13):

- a. Pro Justitia Sentence;
- b. Date and VER number;
- c. The basis for making a VER is the SPV, the institution requesting the VER;
- d. Patient Identity;
- e. Examination results containing:
 - (1) Anamnesis, contains things that the patient told about the incident that caused the injury or wound or complaints that the patient felt;
 - (2) Physical Examination, includes all results of vital signs observations, examination of wounds on all parts of the body, consciousness, body temperature;
 - (3) Supporting examinations are only included if, according to the examining doctor, further examinations are needed to support the answer to the investigator's request;
 - (4) Inspection Summary, in this case contains a summary of all findings from physical to supporting examinations;
 - (5) Doctor's Actions, containing a history of treatment that has been carried out by the doctor, such as therapy, wound treatment, wound stitching, and patient progress notes;
 - (6) The conclusion is a brief summary of the case and an interpretation of the wound. It includes the ratio or region of the wound, the cause of the wound, the degree of the wound, and whether the wound was caused by a blunt or sharp object.
 - (7) The closing contains a statement of truth in making the VER using scientific knowledge and based on an oath in accordance with the Criminal Procedure Code, ending with the signature of the examining doctor.
- f. Use correct Indonesian, do not use abbreviations and foreign terms;
- g. Treated as a confidential letter.

If these provisions are found in the VER, then the formal provisions are valid and considered worthy of being assessed in the evidence. In this case, the VER will be considered documentary evidence because it is a letter bearing a signature that serves to define a thought, this is also contained based on Article 187 letter c of Law No. 1 of 1981 concerning Criminal Procedure Law states that written evidence is a statement from an expert containing an opinion based on his expertise, and is officially requested from him. The VER will also function as expert testimony when explained in court by the expert or, better yet, if the examining doctor becomes an expert in court.

3.2. The evidentiary value in assessing formal errors in the evidence of the post-mortem examination in criminal cases based on Decision Number 309/Pid.B/ 2024/ PN. BJM.

Evidence does not only reveal facts based on the evidence that has been collected so that it can be used as a consideration for the judge in deciding the case, however, the results of the evidence are actually a manifestation of human rights that humans have the right to equal treatment before the law. Humans have the right to be decided according to applicable provisions by paying attention to the aspects of legality and legal certainty, if the judge applies witnesses while the defendant is not proven guilty then that is when human rights have been violated.

On the tenth In Indonesian criminal procedure law, the principle is that all evidence presented at trial has the same evidentiary value, in this case the role of the judge arises to assess the evidence based on his beliefs (Narulitas: 2016, pp. 139). However, as regulated in the Criminal Procedure Code, there are guidelines regarding proof, namely (Ibid, pp. 141).

- a. The Public Prosecutor is authorized to make every effort to prove the defendant's guilt based on what he is accused of. In this case, the public prosecutor is also obliged to prove what he has argued against the defendant;
- b. Legal Counsel has the right to weaken the evidentiary power submitted by the public prosecutor but remains in accordance with the provisions and code of ethics of advocates;
- c. Meanwhile, the panel of judges must be careful and thorough in considering the evidentiary strength of the evidence and be fully confident.

The VER must be accompanied by or complemented by other evidence presented in court. If there are no witnesses or other evidence that can prove the defendant committed a crime, then the elements of assault are not met.

The crime of assault is actually regulated in Articles 351 to 354 of the Criminal Code, and has different types. Article 351 of the Criminal Code explains ordinary assault, Article 352 of the Criminal Code explains minor assault. assault that does not cause illness or obstacles to carry out a position or work, Article 533 of the Criminal Code assault with a plan, namely a criminal act carried out with prior planning, and Article 534 of the Criminal Code Serious assault that intentionally causes serious injury to the victim such as illness or injury that will not heal perfectly, loss of five senses, paralysis, disturbed thinking and other provisions in Article 90 of the Criminal Code. VER will explain the physical condition of the victim from a health perspective, in this case VER can provide information on the injuries suffered by the victim whether they are in accordance with the charges by the public prosecutor or not. At the end (conclusion) of the VER, the examining doctor will usually write down the type of injury, diagnosis, and condition of the patient whether he has suffered serious injuries or cannot do his job due to his injuries.

In decision No. 309/Pid.B/2024/PN BJM, with a single charge of Article 351 of the Criminal Code or ordinary assault. In the evidence it was found that all witnesses did not witness any abuse by the defendant, the defendant also explained that during his relationship as a couple with the victim, the victim often hurt herself. So in his statement the defendant stated that he

did not commit violence against the victim at all, and the injuries found on the victim's body were the result of the victim's habit of hurting herself. The public prosecutor presented witnesses who were the victim's parents and one witness testimonium de auditu, when viewed based on the provisions of the Criminal Procedure Code and the Criminal Code, these two types of witnesses cannot be presented as witnesses unless both parties do not object. The acceptance of the testimony of these two types of witnesses will violate the provisions of Article 168 letter a of the Criminal Procedure Code and the definition of witness testimony based on Article 1 number 27 of the Criminal Code, that witnesses are those who saw, heard, and experienced a criminal event themselves.

In its consideration, the panel of judges stated that the defendant had been proven to have committed a crime according to Article 351 paragraph (1) of the Criminal Code with the element of whoever and committing assault. According to the panel of judges, the testimony of witness Lucy (Victim), witness Syahdatul (testimonium de auditu), and witness Kurniah (victim's mother) was in accordance with VER Number 21/MR/18-X-2023, dated October 18, 2023 with the conclusion Hematoma at regio parietal + multiple vulnus laceratum with hematoma at regia antebrachii dextra et sinistra due to trauma. Which was caused by violence and being thrown against sharp-edged objects, and caused obstacles to carrying out work obligations for 3 (three) days. However, the panel of judges agreed and concurred with the defendant's legal counsel that witness testimonium de auditu and witness parents could not be accepted as evidence but could be constructed as indicative evidence.

Regarding the panel of judges' assessment of the VER, the panel of judges is of the opinion that the capacity and quality of Dr. Halim Fathoni's opinion as an expert who made the VER cannot be doubted in its evidentiary power. Therefore, in this case, how the strength of the VER evidence is submitted or returned to the panel of judges' assessment. Regarding the VER, the panel of judges appears to have ignored the fact that the VER evidence is formally flawed and irrelevant to the defendant's guilt because there is no fact that the defendant has committed abuse against the victim. Although in essence, VER and SPV which are formally flawed do not necessarily invalidate the VER evidence, however, to be valid as evidence, the VER must meet substantive requirements that link one piece of evidence to another.

In deciding a case, a judge needs 2 (two) valid pieces of evidence and the judge's conviction. In this case, the panel of judges has erred in applying the law based on the a quo case, because there was no connection found between the witness's testimony and the defendant's actions. Moreover, in the witness's testimony, the judge still accepted the testimony of witnesses who did not meet the requirements as witness testimony and none of them saw the violence directly, all witnesses only heard from the victim's story and one witness named Gilang was only a person who happened to be at the scene without directly witnessing the violence. Although it has been formally submitted in court under oath, the substance of the statement which is only in the form of hearing from other parties makes it unable to stand as strong evidence. In addition, the facts revealed in the trial that the VER used did not meet the provisions in health science because it did not use correct Indonesian and used foreign sentences, and gave the doctor the conclusion that the object that caused the wound was

specifically a knife in this case the doctor concerned stated that in fact this was not common in the VER, with this, based on the analysis that has been carried out, the evidentiary value of the VER and other evidence is not strong due to formal defects and the evidentiary strength of the witness's statement when it does not meet the material requirements (Edhy: 2025, pp. 11-12).

It is also necessary to examine further, regarding the results of the *Visum et Repertum* which can determine the type of abuse based on the injury, if the injury experienced by the victim or Reporter according to the doctor's statement is not serious and only incapable of carrying out activities for a week, this shows that the public prosecutor has made a mistake in applying the law to his charges. This is very crucial because the judge should be able to acquit the defendant due to the wrong application of the law to the charges.

According to Anang Shopfan Tornado, based on interviews conducted by the researcher, although Law Number 48 of 2009 concerning Judicial Power grants authority to judges, there is still a fundamental principle that must be upheld, namely the principle of beyond reasonable doubt. This principle emphasizes that judges have a moral and legal responsibility not to judge a criminal event carelessly. To build a convincing belief, a minimum of two valid pieces of evidence are required, as regulated in Article 183 of the Criminal Procedure Code. This means that judges cannot rely solely on one type of evidence, but must examine other evidence comprehensively. In the a quo case, the *Visum et Repertum* (VER) can be categorized as expert testimony evidence if the person making it is present in court, or as written evidence if they are not. In the context of criminal evidence, there are five types of evidence according to Article 184 paragraph (1) of the Criminal Procedure Code, namely witness testimony, expert testimony, letters, instructions, and the defendant's statement. If expert testimony and letters are not available, then only one valid piece of evidence remains, namely witness testimony. Meanwhile, the defendant's testimony is limited by the provisions of Article 52 of the Criminal Procedure Code, and indicative evidence is only complementary and depends on the suitability of other evidence. Thus, relying solely on witness testimony would be contrary to the mandate of Article 183 of the Criminal Procedure Code. A legal expert explained that the Criminal Procedure Code is strictly designed to control the actions of law enforcement officers and prevent abuse of authority, which ultimately becomes the judge's consideration in making a decision. Therefore, it is implied that the judge is not permitted to use evidence outside that specified in Article 184 paragraph (1) of the Criminal Procedure Code, as a concrete form of the principle of due process of law.

4. Conclusion

Although the *Visum et Repertum* (VER) as evidence has not been explicitly regulated, the provisions of the VER can be found in official regulations and must meet formal standards based on medical science and law, such as containing the sentence *Pro Justitia*, patient identity, examination results, conclusions, and signed by a doctor. The Visum Request Letter (SPV) is only valid if it is made by an authorized investigator. The VER functions as written evidence and expert testimony in court according to Article 187 letter c of Law No. 1 of 1981 concerning Criminal Procedure. The decision in case No. 309/Pid.B/2024/PN BJM

demonstrates that proof in criminal law is not only about formal evidence, but also concerns human rights and the principle of legality. In this case, the panel of judges found the defendant guilty based on a Verification Verification (VER) and testimony that did not meet formal and material requirements. The VER used was also formally flawed because it did not meet medical and legal standards, and was irrelevant to the fact that the defendant was not proven to have committed assault. Although the VER can still be considered evidence, its strength must be linked to other valid evidence. Because two valid pieces of evidence were not met and there was no consistency between the facts and the charges, the judge's decision in this case was deemed erroneous and potentially violated the defendant's human rights.

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