

Law Enforcement Against Vehicle Theft Perpetrators Using the Modus of Destruction and Selling Evidence

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Abstract. *This study aims to analyze the implementation of law enforcement against perpetrators of motor vehicle theft using the modus operandi of damaging and selling evidence, identify the obstacles faced by law enforcement officers in the process of proof and prosecution, and formulate optimal strategies based on the integration of substantive law analysis, procedural law analysis, and the Islamic legal perspective. The case of District Court Decision No. 44/Pid.B/2025/PN Bgr serves as the primary case study to examine the application of Article 363 paragraph (1) points 4 and 5 of the Indonesian Criminal Code (KUHP) in judicial practice and its implications for the effectiveness of law enforcement. This research employs a normative juridical approach combined with a case approach and a statutory approach. Data were obtained from court decisions, relevant legislation, academic literature, and previous related research. The analysis was conducted qualitatively by synthesizing normative and empirical findings to assess the consistency of legal norm implementation as well as technical-forensic and institutional barriers in handling such cases. The findings indicate that the elements of Article 363 paragraph (1) points 4 and 5 of the Criminal Code are fulfilled when the act is committed jointly and by means of damage, as reflected in the Bogor District Court's decision, which imposed imprisonment and ordered the return of evidence. However, the effectiveness of law enforcement remains hindered by several factors, including the alteration of evidence (commercialization of spare parts), weak supervision of second-hand markets, limited forensic capacity, and a lack of inter-agency data integration. To overcome these obstacles, it is necessary to strengthen forensic capacity, develop an integrated national database of vehicles and spare parts, regulate second-hand markets and prosecute receivers of stolen goods, and integrate Islamic legal values into penal policy emphasizing rehabilitation and prevention.*

Keywords: *Evidentiary Process; Motor Vehicle Theft; Second-Hand Market.*

1. Introduction

Indonesia is an archipelagic nation with extraordinary diversity, encompassing ethnicity, culture, language, and religion. There are more than 1,340 ethnic groups spread throughout the country, with hundreds of regional languages enriching the national identity. This diversity provides significant social capital for development, but also presents challenges in maintaining unity and legal order. The Indonesian legal system is based on civil law, influenced by customary law, Islamic law, and Western law.¹

As a state based on the rule of law (*rechtstaat*), Indonesia guarantees that every citizen has equal rights before the law as stipulated in Article 1 paragraph (3) of the 1945 Constitution of the Republic of Indonesia. The principle of the supremacy of law requires that all community activities be subject to statutory regulations. However, the implementation of this principle does not always run smoothly. Prof. Dr. Sri Endah Wahyuningsih, SH, M.Hum. explained that law enforcement in Indonesia often faces structural, cultural, and substantial obstacles, including weak coordination between law enforcement agencies and a lack of public legal awareness.²

In a social context, rapid modernization and urbanization have brought significant changes to people's lifestyles. High mobility and increasing economic needs are often driving factors for street crime, one of which is motor vehicle theft. Data from the Indonesian National Police shows that this crime is among the top three most frequently reported cases each year.³

Motor vehicle theft in Indonesia is no longer a simple matter, but has evolved with increasingly sophisticated and varied *modus operandi*. One common method is to damage stolen vehicles and break them down into spare parts for sale on the black market. According to Gunarto (2021), this method complicates evidence collection because the vehicle's original appearance has been altered, making it difficult to present evidence in court.⁴

2. Research Methods

The type of research used is juridical-normative, namely legal research that focuses on the study of applicable positive legal norms.⁵ This approach focuses analysis on written legal regulations, doctrines, and court decisions relevant to the research issue. This approach allows researchers to understand the legal framework governing motor vehicle theft, both within the context of positive law and Islamic law.

¹Barizah, N. (2019). *Legal pluralism and integrative justice in the Indonesian context*. Surabaya: Airlangga University Press.

²Wahyuningsih, SE (2020). *Law enforcement in a state based on the rule of law: A theoretical and practical study*. Semarang: UNISSULA Press.

³Indonesian National Police. (2023). *Annual report on street crime in Indonesia*. Jakarta: Indonesian National Police Public Relations Division.

⁴Gunarto, G. (2021). *Indonesian criminal law and criminal justice system*. Semarang: UNISSULA Press.

⁵Soekanto, S. (2007). *Factors influencing law enforcement*. Jakarta: RajaGrafindo Persada.

In addition, a case approach is used, which involves reviewing court decisions regarding motor vehicle theft with the modus operandi of destroying and selling evidence.⁶Through this approach, researchers can identify the application of law by judges, the legal arguments used, and the consistency of decisions with statutory provisions.

3. Results and Discussion

3.1. Forms and Characteristics of Motor Vehicle Theft Crimes Using the Mode of Destroying and Selling Evidence in Indonesia

1. Form of Criminal Act

The form of crime that occurred in this case falls into the category of aggravated theft as regulated in Article 363 paragraph (1) of the Criminal Code (KUHP). This article stipulates that a person can be punished for taking another person's property with the intention of possessing it unlawfully, if it is done under aggravating circumstances, including: done at night in a house or closed yard, done by two or more people in collusion, done by damaging or climbing, or done by using fake keys, fake orders, or fake uniforms. In this context, the theft of motor vehicles committed by the defendants fulfills several aggravating elements at once as regulated in these provisions.

The first element fulfilled is the act of taking property that is wholly or partially owned by another person as stated in Article 362 of the Criminal Code, which is the general basis for the crime of theft. The item taken was a four-wheeled motor vehicle belonging to the victim, which has high economic value and legal ownership status. The act of taking was carried out without permission, with the intent to possess it unlawfully, thus fulfilling the objective elements of the crime of theft as referred to in the article.

The aggravating element that is the basis for the application of Article 363 paragraph (1) 4 of the Criminal Code is fulfilled because the act was carried out by two or more people in collaboration. Legal facts show that there was coordination between the perpetrators in planning the theft at the workshop before the incident, indicating a common intention and a clear division of roles. This cooperation creates efficiency in carrying out the crime, so that the law considers the act more severe because it shows the existence of collective strength that increases the potential for loss and disruption to public order.

The next element that is also fulfilled is committing theft by means of damage, as referred to in Article 363 paragraph (1) 5 of the Criminal Code. The act of damage was carried out by breaking the vehicle window and drilling the ignition keyhole to gain access into the car. This action proves the use of physical force and tools that were deliberately directed to penetrate the security of the goods. This element shows awareness and planning because the

⁶Marzuki, PM (2016). Legal research. Jakarta: Kencana.

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perpetrator brought tools such as a drill and a glass breaker, so that the crime did not occur spontaneously, but had been planned beforehand.

The ultimate goal of this act was to gain economic gain through the sale of stolen goods. The element of "with intent to unlawfully possess" as stipulated in Article 362 of the Criminal Code is evident because the perpetrator not only used the goods but also carried out further actions such as selling the vehicle at a price far below market value, namely Rp22,000,000.00. This action strengthens the existence of an economic motive and the intention of permanent control.

Fulfillment of all elements of the article proves that this crime is no longer included in the category of ordinary theft, but rather aggravated theft because it was carried out with careful planning, group cooperation, and methods of damaging the vehicle's security system. Based on Article 363 paragraph (1) of the Criminal Code, the criminal threat for this act is a maximum of seven years in prison, which legally shows the state's seriousness in providing a deterrent effect against crimes that have a broad impact on society.

The series of facts and the fulfillment of these elements demonstrate that the crimes committed by the defendants had a high degree of culpability and social impact. This legal assessment aligns with the objectives of punishment under Indonesian criminal law, namely to protect citizens' property rights and maintain social order to prevent similar crimes from becoming a habit or part of an organized crime network.

2. Characteristics of Modus Operandi

The characteristics of the modus operandi in the crime of motor vehicle theft as in this case illustrate a well-planned crime pattern and fulfill the aggravating elements as referred to in Article 363 paragraph (1) 4th and 5th of the Criminal Code. The aggravating elements arise because the act was carried out in collaboration and accompanied by destructive methods. The perpetrator's action pattern shows the existence of systematic stages, starting from planning, implementation, to concealing evidence, all of which confirm a high level of intent in this crime.

The planning and division of roles carried out before the action shows that the element of "collusion" as stated in Article 363 paragraph (1) 4 of the Criminal Code is fulfilled, namely that it is carried out by two or more people with mutual awareness. The fact that there was a meeting at the repair shop before the incident and the division of tasks between the perpetrators indicates that there was an agreement that preceded the criminal act. One person was in charge of monitoring the surrounding situation, one carried out the vehicle break-in, one drove the stolen car, and another took care of the sale of the goods obtained from the crime. This act of collusion strengthens the perpetrators' intention to achieve the same goal, so that criminal responsibility is attached jointly because of the unity of will and action (meeting of minds and concert of action).

The use of special tools such as glass breakers, drills, or screwdrivers that had been prepared beforehand demonstrates the fulfillment of the element of “committing theft by means of damage” as stipulated in Article 363 paragraph (1) 5 of the Criminal Code. These tools were not spontaneous, but were rather consciously prepared to facilitate access to the victim's vehicle. The act of breaking the car window and drilling the keyhole demonstrates the presence of strong mens rea because the perpetrator had anticipated the technical obstacles that might be encountered when committing the crime. The fact that the glass breakers were purchased online also indicates an element of careful planning, not an impulsive act.

The choice of the time of the crime, around 4:00 a.m., has important legal value because it shows the use of a situation that aggravates the crime. Although Article 363 paragraph (1) 3 of the Criminal Code explicitly states that the crime is aggravated if it is committed at night in a house or enclosed yard, in this context the act was carried out in the early hours of the morning to avoid witnesses and reduce the risk of being caught red-handed. This shows that the perpetrator consciously chose a time that was considered the safest, thus emphasizing the element of intent in carrying out the crime.

The act of cleaning or altering evidence by replacing the glass and ignition key after the vehicle has been successfully taken over is a form of effort to eliminate traces of the crime as regulated in Article 221 paragraph (1) of the Criminal Code, which prohibits anyone from hiding or eliminating evidence resulting from a crime. Although in this case the main perpetrator who carried out the alteration was the same perpetrator, this action shows the complexity and awareness of the perpetrator to avoid legal tracking. This action aggravates the level of guilt because it shows that the perpetrator not only committed theft, but also carried out further actions to obscure the identity of the vehicle.

The sale of stolen vehicles for Rp22,000,000.00, far below market value, is a typical method of commercializing the proceeds of crime or receiving stolen goods as regulated in Article 480 of the Criminal Code, even though in this case the perpetrator of the theft himself sold the proceeds of his crime. This action demonstrates the ultimate goal of the crime, namely to obtain quick economic profit through black market mechanisms. This cheap and fast sale indicates a close relationship between the perpetrator of the theft and the network of intermediaries or buyers of the proceeds of crime (the receiver), thus opening up the possibility of the involvement of other parties in the crime chain.

The involvement of a third party listed as a "DPO" (wanted person) demonstrates that this crime was not an individual act, but rather part of an organized crime network. The presence of a "DPO" indicates that other perpetrators remain unapprehended and play a significant role in the planning and distribution of the proceeds of the crime. From a criminal law perspective, the existence of such a network aggravates the criminal liability of the perpetrators who have been apprehended, as their actions were not isolated but rather part of a structured criminal network.

3.2. Law Enforcement Against Motor Vehicle Theft Perpetrators Using This Method According to Positive Law in Indonesia and the Perspective of Islamic Law

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Law enforcement against perpetrators of motor vehicle theft in Indonesia is based on the provisions of positive law, especially the Criminal Code (KUHP) as the main legal basis for criminal acts against property. In positive law, the act of motor vehicle theft by means of damaging and selling evidence fulfills the elements of Article 362 of the Criminal Code concerning theft and is aggravated by Article 363 paragraph (1) points 4 and 5 of the Criminal Code, because it is carried out by means of damaging and carried out by two or more people in collaboration. From the description of the case raised by the author, the aggravating elements are clearly fulfilled because the perpetrators committed theft in collaboration, by means of damaging, and with the intention of obtaining economic gain through the sale of goods resulting from the crime. The article reads:

"Threatened with a maximum prison sentence of seven years: (4) theft committed by two or more people in collusion; (5) theft committed by means of damage, climbing, or by using fake keys, fake orders, or fake official clothing."

Thus, law enforcement officers in Indonesia's positive legal system have a strong legal basis to prosecute perpetrators with high criminal penalties. The law enforcement process involves three main stages: inquiry, investigation, and trial. During the investigation stage, Article 184 of the Criminal Procedure Code serves as a reference in determining valid evidence, including witness statements, documents (such as vehicle registration certificates and vehicle ownership certificates), and statements from the defendant. Physical evidence of stolen vehicles is the primary means of proof linking the perpetrator to their actions.

From a criminal law policy perspective, the state considers motor vehicle theft an extraordinary crime that threatens public safety and socioeconomic stability. Therefore, law enforcement must be not only repressive but also preventative through the implementation of a vehicle registration system, workshop supervision, and cooperation with leasing companies and the traffic police.

However, in practice, law enforcement officers face various challenges, such as difficulty tracking evidence after a vehicle's identity has been changed, difficult-to-reach networks of receivers, and perpetrators spread across multiple jurisdictions. Therefore, police typically implement joint investigations or cross-regional cooperation in efforts to dismantle motor vehicle theft networks.

Judges typically consider factors such as the victim's loss, the perpetrator's role, and the economic purpose of the act, in accordance with the principle of proportionality of punishment. Based on Article 197 paragraph (1) letter f of the Criminal Procedure Code, these considerations form the basis for determining the length of the sentence. In the context of this case, the aggravating elements, large losses (Rp. 130,000,000), and destructive actions make the perpetrator worthy of a sentence approaching the maximum (7 years in prison).

The criminal threat for the perpetrator is a maximum of seven years' imprisonment, according to the provisions in the article. If the perpetrator also sells goods resulting from the crime, then he can be subject to cumulative Article 480 of the Criminal Code concerning receiving

goods with a maximum criminal threat of four years. In addition, the act of hiding or changing the identity of a vehicle to make it difficult to recognize can also be prosecuted under Article 221 paragraph (1) of the Criminal Code, because it is included in the category of hiding evidence of a crime.

The law enforcement process according to positive law includes three main stages: investigation, prosecution, and court hearing. In practice, the police are responsible for conducting inquiries and searches to uncover perpetrators, evidence, and the proceeds of crime. Prosecution is carried out by the prosecutor's office, representing the state, to prove the elements of the crime in court. The judge then assesses the case based on the evidence and legal facts revealed during the trial. In the context of the *modus operandi* of destroying and selling, the elements of intent (*dolus*) and planning (*premeditation*) are key to proving the crime. This law enforcement aims not only to impose sanctions but also to provide a deterrent effect and prevent similar crimes from recurring, in accordance with the objectives of criminal punishment as stipulated in Article 52 of Law Number 1 of 2023 concerning the New Criminal Code, namely to protect society, uphold justice, and restore social balance.

Law enforcement against motor vehicle theft crimes often faces challenges, such as limited evidence, the presence of fugitives (DPO), and organized networks of receivers. To overcome these obstacles, law enforcement often employs a systemic approach through cross-regional collaboration and the digitization of vehicle ownership data. Effective law enforcement focuses not only on the primary perpetrators but also on post-crime networks, such as sales intermediaries and repair shops that assist in changing the identities of stolen vehicles. This step aligns with national criminal policy, which emphasizes the importance of preventing and eradicating property crimes as part of legal protection efforts for the public.

From an Islamic legal perspective, the act of motor vehicle theft by damaging and selling the stolen goods falls into the category of *jarimah sariqah*, a criminal act of theft, which is part of *hudūd* if it meets certain conditions, such as the goods taken are in a legal storage place (*ḥirz*), are carried out with malicious intent, and reach a minimum value (*niṣāb*). In this context, motor vehicles are considered *māl mutaḳawwim*, valuable assets according to sharia, so theft is considered a serious violation of ownership rights protected by Islam. Based on QS. Al-Māidah [5]: 38, namely:

"The man who steals and the woman who steals, have their hands cut off as retribution for their actions and as a punishment from Allah."

3.3. Obstacles Faced by Law Enforcement Officers in Proving and Processing Vehicle Theft Cases Using the Mode of Destroying and Selling Evidence and How to Solve Them

Law enforcement against the crime of motor vehicle theft by means of destroying and selling evidence faces various obstacles, both from the technical aspects of evidence, procedural law, and social factors in society.

- Aspects of Proving the Elements of a Criminal Act

The first obstacle lies in the difficulty of proving the elements of the crime, particularly in demonstrating the connection between the perpetrator and the evidence. In such cases, perpetrators typically remove the vehicle's identity, such as by changing the license plate number, repainting it, or replacing components. This action makes the vehicle difficult to identify and obscures the causal relationship between the perpetrator's actions and the victim's losses. However, according to Article 184 of the Criminal Procedure Code, valid evidence is limited to witness testimony, expert testimony, letters, instructions, and the defendant's testimony. If the physical evidence of the vehicle has been altered, proving the actus reus element becomes weak and has the potential to raise doubts in the judge's decision.

However, in Decision Number 44/Pid.B/2025/PN Bgr, the authorities succeeded in breaking down the chain of evidence even though the perpetrator had made efforts to cover his tracks. The trial facts showed that the stolen car was immediately cleaned, the glass and ignition were replaced, and sold for Rp22,000,000. However, evidence from witness statements, the defendant's confession, and the leasing company's statement were able to link the evidence back to the legal owner, Erni Suhaeni, through Astra Sedaya Finance leasing. This shows that technical obstacles to proof can be overcome through a combination of valid evidence and consistent confessions between the perpetrators.

Theory suggests that proving the crime of vehicle theft with identity deletion is difficult without strong physical evidence. However, this case demonstrates that elements of criminal conduct and intent can be proven through circumstantial evidence such as confessions, police witness statements, and vehicle ownership documents. This demonstrates the authorities' success in optimizing the provisions of Article 184 of the Criminal Procedure Code despite complex evidentiary conditions.

- The Obstacle of Lack of Eyewitnesses

Lack of direct evidence and eyewitnesses. Most vehicle thefts occur at night or in deserted locations without witnesses. CCTV footage, which should serve as electronic evidence, is often unavailable, damaged, or of low quality, making it unsuitable for use as strong evidence. This makes it difficult for investigators to accurately identify the perpetrators. Furthermore, the limited technical capabilities of authorities in conducting forensic examinations of motor vehicles, such as engine number tracing or paint analysis, also hinder the investigation process. The lack of support from forensic laboratories at the regional level forces authorities to send evidence to the central government, prolonging investigations and reducing the effectiveness of the legal process.

In theory, proving vehicle theft is often hampered by a lack of direct witnesses, as the crime occurs in deserted areas and in the early hours of the morning. This makes it difficult to convincingly prove the element of "taking someone else's property" in court.

In case No. 44/Pid.B/2025/PN Bgr, this obstacle was indeed present. No witnesses directly saw the perpetrator break the window and take the vehicle. The main witness (Hepi Irawan)

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only learned of the vehicle's disappearance in the morning, and witness Cakra Buana only obtained information from another resident (Ade Rahmat) who had seen a suspicious person. This means that the witnesses' evidence is circumstantial. However, investigators were able to overcome this obstacle through rapid investigation and intensive interrogation techniques, which resulted in a voluntary confession from the defendant as well as evidence in the form of letters and leasing documents that strengthen the connection between the stolen vehicle and its owner. This demonstrates the investigators' ability to apply layered evidence to cover the gap in direct evidence.

Theoretically, the lack of eyewitnesses can weaken the evidence. However, this case demonstrates the effectiveness of integrating the defendant's testimony and written evidence as a substitute for direct witness testimony. This approach aligns with the doctrine of "in dubio pro reo." As long as the judge's conviction is validly formed through consistent evidence, a verdict can still be rendered.

- Forensic Technical Obstacles and Evidence Tracking

The lack of integration in the national motor vehicle data system. Ownership data scattered across various agencies such as the Vehicle Registration Agency (Samsat), the police, and leasing companies makes tracking stolen vehicles ineffective. Criminal networks often exploit this gap by selling vehicles outside the region or on the black market, even shipping them between provinces without proper documentation. Weak oversight of the used vehicle market and unofficial repair shops exacerbates the situation, as many of them serve as shelters for stolen vehicles. This situation demands stronger cross-sector coordination between the National Police, the Ministry of Transportation, and the Ministry of Finance to create an integrated digital tracking system.

The limited availability of forensic laboratories and vehicle tracking systems hampered the investigation. However, in this case, the Bogor Police successfully tracked and apprehended the defendants quickly, based on field information and chain confessions between the perpetrators. This means that the success of the investigation depends not only on the forensic laboratory but also on effective field coordination.

However, it must be acknowledged that evidence of stolen vehicles was not completely secured, as they had been sold to other parties. This demonstrates the weaknesses of the national vehicle tracking system, as criticized in the theoretical description. Therefore, theory and practice agree that an integration of vehicle ownership data and digital tracking systems (VIS or ANPR) is necessary to prevent stolen vehicles from changing hands.

The facts of the case confirm the theory that weaknesses in the vehicle data digitization system slow down the tracking of evidence. A theoretical solution, a national stolen vehicle database, is relevant to prevent stolen cars from being quickly sold or transferred without detection.

- Social and Cultural Barriers to Law

Low public legal awareness causes many victims to delay reporting lost vehicles, thus reducing the opportunity for authorities to quickly trace evidence. On the other hand, individuals are still found to be involved in the practice of receiving or trading stolen vehicles, which hinders comprehensive law enforcement efforts. Economic factors are also a major trigger for this crime, as some perpetrators come from lower-middle class backgrounds tempted by the temptation to make a quick profit. In this case, the victim only reported the incident the morning after the vehicle was lost, so the car had already changed hands and been sold. This delay reinforces the theory that social factors and reporting time are significant obstacles to effective investigations.

However, the authorities' success in solving this case demonstrates that despite the late reporting, the investigation process can still proceed effectively due to the participation of the surrounding community (information from resident Ade Rahmat). This supports the theory that increased public participation and legal awareness among residents near the crime scene play a crucial role in expediting the resolution of crimes.

The theory that highlights the community as a source of obstacles in this case suggests that the community can also be part of the solution, through reporting and providing field information that assists the police. Monitoring the used vehicle market and enforcing Article 480 of the Criminal Code are crucial, as current judicial practice has not addressed the dimension of receiving stolen goods as a derivative crime.

4. Conclusion

Forms and Characteristics of Motor Vehicle Theft Crimes Using the Mode of Destroying and Selling Evidence in Indonesia. The crime in this case is aggravated theft according to Article 363 paragraph (1) of the Criminal Code, characterized by the act of taking a motor vehicle unlawfully, carried out together, and using the mode of destroying and quickly selling evidence. The planned modus operandi includes planning, division of roles, use of technical tools, selection of quiet times, to the transfer of stolen goods—indicating a crime that is organized, economically oriented, and has a high mens rea. Economic motives are the main driving force, although they do not eliminate criminal responsibility; the perpetrator's social background can only be considered as a mitigating factor. This crime has significant material, administrative, and psychological impacts on victims and public security. Therefore, handling it requires a comprehensive approach through a combination of repressive and preventive policies, including increasing coordination of law enforcement, digitizing vehicle data, regulating the black market in spare parts, and development programs to reduce recidivism. Law Enforcement Against Motor Vehicle Theft Perpetrators Using This Method According to Positive Law in Indonesia and the Perspective of Islamic Law. Law enforcement against motor vehicle theft using the method of destroying and selling evidence is classified as aggravated theft according to Article 363 paragraph (1) of the Criminal Code. The enforcement process, from investigation to criminalization, aims to protect property rights, create a sense of security, and provide a deterrent effect, but must still pay attention to the principle of proportionality and driving factors such as economic conditions and weak environmental

supervision. The effectiveness of law enforcement also requires preventive measures through increasing vehicle security and community empowerment.

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