

The Role of the Justice Collaborator in A Premeditated Murder Crime

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ARTICLE INFO

Article history:

Received Nov 05, 2022

Revised Nov 12, 2022

Accepted Dec 03, 2022

Keywords:

Crime;
Justice Collaborator;
Premeditated Murderer.

ABSTRACT

Justice collaborators are perpetrators of crimes willing to work with law enforcement to dismantle a crime or case that is considered complex and major. In criminal acts of murder that are organized and carried out by several people, the role of a justice collaborator is needed to reveal the role of each perpetrator. This study employs a normative juridical approach with statutory and case studies. According to the findings of this study, the role of a justice collaborator in the criminal act of organized murder committed by multiple perpetrators is critical in terms of providing information to law enforcement officials, what is the chronology of the beginning of the loss of life, what tools were used by the perpetrators in killing someone, the place where the loss of life occurred, to the extent of exposing the perpetrators who were involved in the loss of life so that the crime can be completed and not stop at the perpetrators who played a minimal role. Then, under law No. 31 of 2014, witnesses and victims are protected, and the requirements for becoming a justice collaborator, according to SEMA No. 4 of 2011, are that one of the perpetrators of a crime, but not the main actor in a crime, provides information as a witness in the judicial process, providing significant evidence, and uncovering actors who have a larger role.

ABSTRAK

Justice collaborator merupakan pelaku tindak pidana yang bersedia bekerja sama dengan penegak hukum untuk membongkar sebuah kejahatan atau kasus yang dinilai pelik dan besar. Dalam tindak pidana pembunuhan yang terorganisir dan dilakukan oleh beberapa orang peran Justice collaborator sangat dibutuhkan untuk mengungkap peran masing-masing pelaku. Penelitian ini dilakukan untuk mengetahui pentingnya peran justice collaborator dalam mengungkap tindak pidana pembunuhan berencana yang dilakukan lebih dari satu orang secara terorganisir. Penelitian ini menggunakan metode yuridis normatif dengan pendekatan undang-undang dan pendekatan kasus. Hasil penelitian ini menunjukkan bahwa peran justice collaborator dalam tindak pidana pembunuhan yang terorganisir dilakukan oleh beberapa pelaku sangat diperlukan dalam hal memberikan keterangan kepada aparat penegak hukum, bagaimana kronologi awal mula terjadinya penghilangan nyawa, alat apa saja yang digunakan oleh para pelaku dalam penghilangan nyawa seseorang, tempat terjadinya penghilangan nyawa, sampai sampai mengungkap para pelaku yang ikut terlibat dalam penghilangan nyawa sehingga tindak pidana dapat tuntas dan tidak berhenti pada pelaku yang berperan minim. Kemudian justice collaborator dilindungi oleh undang-undang no 31 tahun 2014 perlindungan saksi dan korban, dan syarat menjadi seorang justice collaborator menurut SEMA No.4 tahun 2011 yaitu merupakan salah satu pelaku tindak pidana, bukan merupakan pelaku utama dalam tindak pidana, memberikan keterangan sebagai saksi didalam proses peradilan, memberikan bukti-bukti yang signifikan dan mengungkap pelaku-pelaku yang memiliki peran lebih besar.

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I. INTRODUCTION

Crimes against life are thought to be the oldest and most primitive crimes committed by humans. The threat of punishment is then used to regulate crimes against life or murder. There are rules regarding the prohibition of this crime against life in the history of law known to humanity. This demonstrates that all nations' basic human instincts judge that killing other people's lives is an act that violates the value of justice in man himself (Bahiej, 2012). The crime of murder is included in material offenses (*metreel delict*), an offense whose formulation focuses on consequences that are prohibited and punishable by law (Musahib, 2022). This means an act that causes the loss of a person's life by hitting, stabbing, shooting, poisoning, or whatever can be proven.

Premeditated murder is the cruelest and most severe punishment in the Criminal Code (KUHP). Premeditated murder is regulated in Article 340 of the Criminal Code, which reads, "Whoever intentionally and with prior planning takes the life of another person, is threatened with premeditated murder, with the death penalty or life imprisonment or for a certain time, a maximum of twenty years." (Rahmawati et al., 2021) The crime of premeditated murder is the same as that of ordinary homicide contained in Article 338 of the Criminal Code, except that in premeditated murder, there is an element of intent and premeditation.

The meaning of the element "intentionally" is that a person who commits an act deliberately wants the act to commit a crime consciously, and he knows the consequences of the act. Then the meaning of "with a plan" is seen as existing if the perpetrator, in sufficient time, has thought and considered and then determined the time, place, method, or means and so on that will be used for the murder (Batas, 2016). With an element of planning regarding time and method, more than one person usually commits premeditated murder, in which the perpetrator asks for help from one or several people to participate and assist in acting.

Participation (*deelneming*) can occur if, in a criminal event, there is more than one person, so the responsibility and role of each participant in the incident must be sought (Pratiwi & Nursiti, 2018). Participation or *deelneming* is contained in Article 55 of the Criminal Code paragraph (1), which reads "(1). Those who do, those who order to do, and those who participate in doing the deed. (2) those who deliberately encourage other people to take action by giving or promising something, abusing power or dignity, violence, threats, misdirection, or providing opportunities, means, or information. From the article, it is found that the forms of inclusion are implementing actors (*plegen*), ordering actors (*Doen plegen*), participating actors (*medeplegen*), persuading actors (*uitlokken*), and supporting actors (*medeplechtige*). With the existence of these forms of crime, law enforcement officials will have difficulty finding the person in charge of each role of the crime of murder that has been committed as a group. Then one way that can be taken by law enforcement is by asking for information—witnesses who are also perpetrators of crimes and participate in committing them (justice collaborators). Sanctions for enforcement of the death penalty can be applied to premeditated murder because the application of the death penalty is not contrary to human rights, which have been much questioned so far (Pratama, 2019). Although there is a view that the application of the death penalty to the perpetrators of premeditated murder does not protect human rights, in this case, the death penalty in Article 10 of the Criminal Code is contrary to the constitution, namely in Article 28A of the 1945 Constitution of the Republic of Indonesia stipulates that "every person has the right to live and has the right to defend his life and living." (Laia, 2021).

Witnesses who are also criminals who are willing to assist law enforcement officials in uncovering a crime or the impending occurrence of a crime in order to return assets or proceeds of a crime to the state by providing information to law enforcement officials and testifying in court are referred to as justice collaborators (Murtadho, 2013). Justice collaborator means an actor who cooperates and is one of the perpetrators of a crime, who admits the crime he committed and is not the main actor but cooperates in expressing truth and justice. Because uncovering criminal acts is

the duty of every citizen. Many cases remain unresolved and unresolved because witnesses and victims are afraid to testify to law enforcement because they receive threats from certain parties, even though their testimony is a very decisive element in the judicial process to uphold justice.

The phenomenon of justice collaborators in Indonesia initially emerged from the role of Agus Condro Prayitno in uncovering the traveler check case for the election of the Senior Deputy Governor of Bank Indonesia, Miranda Swaray Gultom, which involved 31 Members of the DPR's Commission IX for the 1999-2004 period, the appointment of Agus C. Prayitno as a justice collaborator by the KPK was based consideration in the 2011 Joint Regulation and SEMA No. 4 of 2011. Then in SEMA, it is explained that the existence of this term aims to foster public participation in disclosing a particular crime. One of the SEMA references is Article 37, Paragraph (2) and Paragraph (3) of the 2003 United Nations Convention Against Corruption.

Previous research only focused on Justice Collaborators with Corruption and organized crime only. The difference with the journal or novelty in this journal is that it discusses justice collaborators in organized crime of premeditated murder. This premeditated murder case has attracted the public's attention and has become phenomenal because, in this premeditated murder case, many perpetrators were not revealed. One example is the murder case of a human rights activist (HAM), Munir Said Thalib, which still leaves a question mark. It is not yet known who is the mastermind behind the murder that occurred 18 years ago.

The most recent organized crime at this time and which will be discussed in this journal, is the case of premeditated murder, which killed Brigadier Nofriansyah Yosua Hutabarat at the official residence of the Head of Propam Polri Ferdy Sambo Division at the Police Complex, Duren Tiga, South Jakarta. On July 8, 2022, at 17.00. the role of Bharada Richard Eliezer Pudihang Lumiu, who is a witness as well as a perpetrator (Justice Collaborator), can assist law enforcement officials in uncovering the main culprit in the death of Brigadier Nofriansyah Yosua Hutabarat.

Based on the description above, in resolving cases of murder committed by a group of people, of course, Law Enforcement Officials must thoroughly investigate it. However, sometimes the law enforcers themselves have to face many obstacles. So to streamline the time and energy of Law Enforcement Officials, it is very necessary to have a "key problem" of a case; we can find this from a justice collaborator, so.

II. RESEARCH METHOD

Research is an effort to develop science and technology and reveal the truth. Normative juridical methods are used to develop knowledge as a topic raised by the author in this research study (Hosnah et al., 2021). Researchers employ the normative legal method in their research by examining library materials or secondary data, which includes primary, secondary, and tertiary legal materials. The author employs both a statutory and a case-by-case approach. A statutory approach examines all laws and regulations pertaining to the legal issues surrounding premeditated murder. A case approach examines cases that are related to the problem under consideration.

Document study is a legal material collection technique that supports and is related to the research presentation (literary study). Document study is a tool for collecting legal materials through the analysis of written legal materials. In this normative legal research, only library and secondary materials, including primary, secondary, and tertiary legal materials, are examined. Primary legal materials are the Republic of Indonesia's 1945 Constitution and the Criminal Code, whereas secondary legal materials are materials that explain and comprehend primary legal materials, such as research results literature, a legal journal relating to justice collaborators, or the crime of murder. Tertiary legal materials, namely materials that provide instructions and explanations of primary and secondary legal materials consisting of legal dictionaries, general Indonesian dictionaries, and other manuals related to problems in research.

The data obtained from the research results are inventoried and identified, then managed and analyzed qualitatively using deductive logical thinking; from general matters, specific conclusions are drawn. Using qualitative analysis means that the results do not depend on data from numbers (quantitative) but are analyzed from various angles in depth (holistic).

III. RESULT AND DISCUSSION

The Role of Justice Collaborator in the Crime of Premeditated Murder

In Indonesia, the term "justice collaborator" is relatively new. Justice collaborators had only recently begun to be used in the world of Indonesian law when Law 13 of 2006 concerning the Protection of Witnesses and Victims was issued, which was later amended to Law 34 of 2014 concerning the protection of witnesses and victims. The role and involvement of Justice collaborators in a crime are frequently used to expose dishonesty and deviance committed by him and his colleagues. This is not an easy task because he must honestly disclose what he and his colleagues have done in an organized crime, or else he will be held accountable for what he disclosed. This justice collaborator can then be used as a source of information concerning uncovering the larger brain of the perpetrator so that the crime can be completed and does not stop at the perpetrator, who plays a minimal role in the crime (Hafid, 2019).

Then the role of the Justice Collaborator is very important because he is a person who is directly involved with the crime or can be said to be a minor actor in the crime network where his existence is to uncover the mastermind behind the biggest crime perpetrator so that the crime can be completed and does not stop only at the perpetrators who play a role minimal in criminal acts that are classified as extraordinary crimes (Achmad & Taun, 2022). Because the justice collaborator is a person involved in the crime, his statement is the most powerful type of evidence available in the process of disclosing a criminal process, beginning with the investigation stage and ending with the stage of proof in court, the whereabouts and role of witnesses are highly anticipated. Witness testimony is crucial to the successful investigation of criminal cases.

The key role of the justice collaborator includes providing information to law enforcement officials, the chronology of the beginning of the disappearance, what tools were used by the perpetrators in killing someone, where the loss of life occurred, and uncovering the perpetrators who took part in it—involved in the loss of life so that criminal acts can be completed and not stop at the perpetrators who play a minimal role.

Justice collaborators normatively are also regulated in the Supreme Court Circular Letter (SEMA) Number 4 of 2011 that the person concerned is not the main actor, admits the crime he has committed, provides information as a witness in the judicial process, provides information and significant evidence so that it can assist law enforcers in uncovering the case effectively, uncovering other actors who have a bigger role so that the punishment received by the perpetrators is fair, and returning assets or proceeds from the crimes that have been committed (Sirait, 2019).

The following are the rights obtained by witnesses and victims according to Article 5(1) of Law No. 13 of 2006 Concerning the Protection of Witnesses and Victims:

- a. obtain protection for personal security, family, and property, and free from threats relating to the testimony that will be, is being, or has been given;
- b. participate in the process of selecting and determining forms of security protection and support;
- c. provide information without pressure;
- d. got a translator;
- e. free from ensnared questions;
- f. obtain information regarding the progress of the case;
- g. obtain information regarding court decisions;
- h. obtain information in terms of the convict being released;

- i. identity withheld;
- j. got a new identity;
- k. get a temporary residence;
- l. got a new residence;
- m. obtain reimbursement of transportation costs as needed;
- n. get legal advice;
- o. obtain temporary living expenses assistance until the Protection deadline expires, and p.s. get assistance.

According to Article 1, number 27 of the Criminal Procedure Code which reads "Witness testimony is one of the pieces of evidence in a criminal case in the form of a statement from a witness regarding a criminal event that he heard, saw and experienced himself by stating the reasons and his knowledge." This means that the testimony of a witness is the most important evidence for the investigation, prosecution, and trial, which he heard, saw, and experienced himself. When referring to Article 10 paragraph (2) of Law No. 13 of 2006 concerning the Protection of Witnesses and Victims – it seems that justice collaborators have not been provided with protection. Because even though he is a cooperating actor, it does not result in the loss of the state's authority to prosecute the person concerned (Satria, 2016).

However, the term "crown witness" does not appear in the Criminal Procedure Code. According to the reasons contained in the prosecutor's office's cassation memory filed in Supreme Court Decision No. 2437 K/Pid.Sus/2011, "Even though a precise definition is not given in the Criminal Procedure Code regarding Crown Witnesses (*kroongetuide*), based on an empirical perspective, Crown Witnesses are defined as Witnesses originating or taken from one of the suspects or other Defendants who jointly committed a criminal offense". The crown given to the Witness with the Defendant's status is in the form of not being prosecuted for his case or giving a very light charge if the case is transferred to the Court or forgiven for mistakes that have been made. Nevertheless, a justice collaborator still gets the same punishment as other suspects in the same crime. This indicates no difference between being a justice collaborator and a perpetrator who both commit crimes.

Legal Protection for justice collaborators

Legal protection for justice collaborators is urgently needed because the crimes to be uncovered are serious crimes involving several people. The threats he gets will also endanger himself and even his family. Given the importance of a justice collaborator's key role, it must be accompanied by clear legal protection. Legal protection is any type of protection that is governed by statutory regulations and legal certainty. "Protection is a type of service that law enforcement officials or security forces must provide to victims and witnesses to provide a sense of security, both physically and mentally, from threats," according to Article 1 PP No. 2 of 2002.

Definition of Protection According to Article 1 paragraph (6) of Law No.13 of 2006 states that "Protection is an effort to fulfill rights and provide assistance to provide a sense of security to witnesses and victims which the LPSK or other institutions must carry out following the provisions this law." The following is the protection provided by the State in Article 10 point A of Law no. 31 of 2014 Amendments to Law No. 13 of 2006 legally provide guarantees to witnesses of justice collaborators, which reads:

- a. Witnesses can be given special treatment in the examination process and appreciation for their testimony;
- b. Special treatment, as referred to in paragraph (1), takes the form of:
 - 1) separation of the place of detention or serving a crime between witnesses and suspects and convicts whose crimes have been disclosed; 2) separation The award for the testimony referred to in paragraph (1) is in the form of:
 - 2) Remission of criminal convictions; or

- 3) Conditional release, additional remissions, and other rights of convicts following statutory provisions for Perpetrator Witnesses with convict status.
- c. In order to obtain an award of leniency in sentencing as referred to in paragraph (3) letter a, the LPSK shall provide a written recommendation to the public prosecutor to include in its charge to the judge.
- d. The LPSK shall make written recommendations to the minister in charge of government affairs in the field of law in order to obtain awards such as parole, additional remissions, and other convict rights referred to in paragraph (3) letter b.

The article above states that a witness or justice collaborator is given special protection in the form of a separate place of detention or prison with the perpetrators of the same crime, separation of files, and giving testimony before the court without dealing directly with the defendant in the same case. The judge takes the testimony and statement into consideration in mitigating the sentence. Referring to Articles 55 of the Criminal Code and 56 of the Criminal Code, in the end, it is necessary to have awareness on the part of the aggrieved party in order to maintain a fair and peaceful law following the legal procedures in force in Indonesia (Ruslan, 2021). Justice Collaborators can be found through the functioning of the Criminal Justice System in investigations, prosecutions, court hearings, and implementing decisions (Ruslan, 2021).

This law also governs the Witness and Victim Protection Agency, which is in charge of protecting witnesses and victims (LPSK). The Witness and Victim Protection Agency, abbreviated as LPSK, is an independent institution whose duty and authority are to provide witnesses and victims with protection and rights based on legal duties and authorities. The following are the LPSK Protection Programs:

- a. Physical Protection
Security, placement in a safe house, a new identity, medical assistance and giving testimony without being directly present in court, and psychosocial rehabilitation assistance.
- IV. Procedural Safeguards
Assistance, getting translators, getting information about case developments, reimbursing transportation costs, legal advice, temporary living expenses assistance until the protection deadline, and so on according to the provisions of article 5 of Law 13/2006.
- b. Legal Protection
Witnesses, victims, perpetrator witnesses, and reporters cannot be prosecuted criminally or civilly for testimony or reports that will be or have been given, unless the testimony or report is not given in good faith.
- c. Psychological Medical Assistance and Psychosocial
Medical assistance is assistance to restore the victim's physical health, including carrying out arrangements if the victim dies, for example, managing bodies and funerals. Psychological Rehabilitation is assistance provided by psychologists to Victims who suffer from trauma or other psychiatric problems to restore the victim's mental condition. Psychosocial Rehabilitation encompasses all types of psychological and social services and assistance aimed at relieving, protecting, and restoring the victim's physical, psychological, social, including the LPSK seeks to improve the victim's quality of life by cooperating with the relevant authorities in the form of assistance in fulfilling clothing, food, boards, assistance in obtaining employment, or assistance in continuing education.
- d. Restitution and Compensation Facilities
Restitution is compensation paid by perpetrators or third parties to victims or their families. Compensation is provided by the state because the perpetrator is unable to provide full compensation, which is his obligation to the victim or his family.

With a protection program from the LPSK, the guarantee of a sense of security for justice collaborators is getting stronger. This has been proven that in 2022 applications for protection from

the LPSK have increased sharply, namely 4,571 applications. This figure is a new record because, for 14 years, there have been approximately 2,000 cases per year. This indicates that the presence of the LPSK is very much needed by the community and has gained the community's trust and open mind to help uphold justice, which is the duty of every citizen. The granting of protection is terminated if there is a request for dismissal from the person concerned, the witness dies, or, based on the considerations of law enforcement officials and security forces, protection is no longer needed. This means that protection can be terminated if a witness voluntarily asks him not to be given protection anymore, if the witness dies, or also on the consideration of law enforcement officials that the witness no longer needs legal protection.

The legal protection model for justice collaborators handling criminal acts in Indonesia can use a persuasive protection model. This persuasive model is comprehensive for the protection of justice collaborators, which involves all law enforcement components with authority to handle criminal acts. By using this persuasive model, the components of the institution coordinate with each other so that if a justice collaborator has given information to one institution, it is expected that all components of the institution will protect it (Ariyanti & Ariyani, 2020). Although politics has a significant impact on the formation of the law. Despite the fact that the law cannot be separated from the political elements that must be present when the law applies, all political activities must be subject to the law (Romdoni et al., 2022).

Requirements to become a justice collaborator Based on SEMA NO. 4 of 2011 Case Study Bharada E

On Friday, July 8, 2022, at 17.00 WIT, it was suspected that there was a shootout incident between Bharada Richard Eliezer Pudihang Lumiu alias Bharada E and Brigadier J which killed Brigadier J at the official residence or shelter at the Duren Tiga Police Complex, Jalan Duren Tiga Barat 005/001, Pancoran, South Jakarta. Then Ferdy Sambo reported the incident at 17.20 WIB with the scenario of a shooting incident between Bharada E and Brigadier J. The incident allegedly occurred because Brigadier J abused Ferdy Sambo's wife, Putri Candrawathi.

At the beginning of the disclosure of this case, Bharada E confirmed that there was a shootout at the Sambo official residence between himself and Brigadier J. He said that at that time, he was promised by Sambo that the investigation into the death of Brigadier J would be stopped. Based on this promise, Bharada E finally complied with the Sambo scenario regarding the shootout that killed Brigadier J. However, it seems that Bharada E remains a suspect. He finally decided to reveal the true events regarding Sambo engineering. However, on August 5, 2022, Bharada E made a change regarding his initial confession that he said he would provide truthful information to law enforcement about the shooting of Brigadier J.

Then on August 8, 2022, Bharada E officially volunteered as a justice collaborator through his attorney at the time, Deolipa Yumara, to the Witness and Victim Protection Agency (LPSK). Then Bharada E's request for justice collaboration was granted on August 12, 2022. If the LPSK grants Bharada E's request as a justice collaborator, this means that Bharada E has fulfilled the conditions listed in the Supreme Court Circular Letter (SEMA) (Mamahit, 2016). The position of actors participating has yet to have a strong position. Especially considering the analysis of the verdict, which shows the essence of the Collaborating Witnesses mitigating participation so that it is necessary to include it in the main criminal law (Sutanti & Arief, 2013). The Supreme Court Circular Letter (SEMA) Number 4 of 2011 and the Joint Regulations of the Minister of Law and Human Rights, the Attorney General, and the Chief of the National Police, namely:

- a. Is one of the perpetrators of a crime.

The first requirement to become a justice collaborator is that the person concerned is one of the perpetrators involved or took part in the crime of killing someone. In order to make it easier for law enforcers to uncover cases in an organized manner, law enforcers need information from one of the suspects. Based on the case above, Bharada E is one of the suspects in the crime of shooting Brigadier J.

- b. The suspect is not the main actor in the crime.

The most important requirement for a justice collaborator is not to be the main actor but only a minor actor. Based on the case above, Bharada E was not the main actor in the murder of Brigadier J; in fact, Bharada E shot Brigadier J based on FS's orders and not his own will or desire.

- c. Provide testimony as a witness in the judicial process.

Reveal a crime starting from the investigation and prosecution to trial in court. As stated by Bharada E's testimony, he gave an honest statement about the crime of shooting Brigadier J. Starting from the testimony of Locus, Tempus, to the people who were involved in the crime. Later this information will become the main key for investigators and prosecutors to uncover crimes based on Locus, Tempus, and the roles played by the perpetrators in the death of Brigadier J. Bharada E was a key witness in the shooting at FS's residence.

- d. Revealing Actors who have a bigger role.

The goal of a justice collaborator is to reveal the main character of the crime who has a bigger role or brain than the perpetrator of the crime so that the punishment obtained continues beyond those who commit minimal crimes.

IV. CONCLUSION

Justice collaborators have an important role in organized criminal acts of premeditated murder because a justice collaborator is key in uncovering crimes he has committed with other perpetrators. The chronology of the beginning of the loss of life, what tools were used by the perpetrators in killing someone, the place where the killing took place, to the extent of revealing the perpetrators who were involved in the killing so that the crime could be completed and not stop at the perpetrators who played a minimal role.

Protection for Justice Collaborators is contained in Law no. 31 of 2014. Amendments to Law No. 13 of 2006 are given special protection in the form of separation of places of detention or prisons with the perpetrators of the same crime, separation of files, and giving testimony before the court without dealing directly with the defendant in the same case. The judge takes the testimony and statement into consideration in mitigating the sentence. The Witness and Victim Protection Agency provides several protection programs for justice collaborators.

The Supreme Court Circular Letter (SEMA) Number 4 of 2011 and the Joint Regulations of the Minister of Law and Human Rights, the Attorney General, and the National Police Chief establish the requirements for becoming a justice collaborator, which include being one of the perpetrators of a crime, not being the main actor in a crime, testifying as a witness in the judicial process, providing significant evidence, and exposing perpetrators who have a larger role.

Reference:

- Achmad, F. F., & Taun, T. (2022). Peran Justice Collaborator dalam Pengungkapan Kasus Pidana di Indonesia. *Jurnal Pendidikan Dan Konseling*, 4(5), 7950–7958.
- Ariyanti, D. O., & Ariyani, N. (2020). Model Pelindungan Hukum Terhadap Justice Collaborator Tindak Pidana Korupsi Di Indonesia. *Jurnal Hukum Ius Quia Iustum*, 27(2), 328–344. <https://doi.org/10.20885/iustum.vol27.iss2.art6>
- Bahiej, A. (2012). Kejahatan Terhadap Nyawa: Sejarah dan Perkembangan Pengaturannya dalam Hukum Pidana Indonesia. *Sosio-Religia*, 10(2), 73–100.
- Batas, E. M. (2016). Tindak Pidana Pembunuhan Berencana Menurut Pasal 340 Kitab Undang-Undang Hukum Pidana. *Lex Crimen*, 5(2), 118–125.

- Hafid, Z. P. (2019). A Review of Justice Collaborator from Law Number 31 of 2014 Concerning the Protection of Witnesses and Children. *Jurnal Al-Qadau*, 6(1), 39–58.
- Hosnah, A. U., Wijanarko, D. S., & Sibuea, H. P. (2021). *Karakteristik Ilmu Hukum dan Metode Penelitian Hukum Normatif* (D. Safitri, Ed.; 1st ed.). Rajawali Pers.
- Laia, L. D. (2021). Perlindungan Hukum Dalam Penerapan Hukuman Mati Pada Tindak Pidana Pembunuhan Berencana. *Jurnal Panah Keadilan*, 1(1), 22–26.
- Mamahit, C. E. (2016). Kajian Surat Edaran Mahkamah Agung (SEMA) Nomor 4 Tahun 2011 tentang Saksi Pelaku Tindak Pidana Yang Bekerjasama (Justice Collaborator). *Lex Crimen*, 5(6), 163–168.
- Murtadho, M. A. (2013). *Pengaturan Saksi Pelaku Yang Bekerjasama (Justice Collaborator) di Amerika Serikat, Jerman dan Belanda*. Universitas Brawijaya.
- Musahib, A. R. (2022). Peratnggungjawaban Pidana Terhadap Hilangnya Nyawa Orang Yang Dilakukan Secara Bersama-sama. *Jurnal Inovasi Penelitian*, 2(9), 2989–2994.
- Pratama, W. A. (2019). Penegakan Hukuman Mati Terhadap Pembunuhan Berencana. *SIGN Jurnal Hukum*, 1(1), 29–41.
- Pratiwi, V., & Nursiti. (2018). Tindak Pidana Pembunuhan Berencana Yang Dilakukan Secara Bersama-sama. *Jurnal Ilmiah Mahasiswa Bidang Hukum Pidana*, 2(4), 679–688.
- Rahmawati, D., Siregig, I. K., & Zainudin. (2021). Pertimbangan Hakim dalam Menjatuhkan Pidana Terhadap Pelaku Tindak Pidana Pembunuhan Berencana. *Widya Yuridika: Jurnal Hukum*, 4(1), 207–218.
- Romdoni, M., WN, S. F., & Nurdiansyah, R. (2022). Impact Of Political Policy On The Implementation Of Law Enforcement. *Mediation: Journal of Law*, 1(2), 67–74.
- Ruslan, M. F. (2021). Penerapan Sanksi Pidana Terhadap Pelaku Turut Serta Tindak Pidana Pembunuhan Berencana Berdasarkan Pasal 56 Kitab Undang-Undang Hukum Pidana (KUHP) dan Upaya Hukum Untuk Mewujudkan Keadilan. *Wacana Paramarta Jurnal Ilmu Hukum*, 20(2), 28–34.
- Satria, H. (2016). Menakar Perlindungan Justice Colaborator Quo Vadis Justice Collaborator. *Jurnal Konstitusi*, 13(2), 431–454.
- Sirait, A. S. (2019). Kedudukan dan Efektivitas Justice Collaborator di dalam Hukum Acara Pidana. *El-Qanuny*, 5(2), 241–256.
- Sutanti, R. D., & Arief, B. N. (2013). *Kebijakan Formulasi Saksi Pelaku Yang Bekerjasama (Justcie Collaborator) Sebagai Alasan Peringan Pidana Dalam Rangka Pembaharuan Hukum Pidana Nasional*. Universitas Diponegoro.