

**REVIEW OF THE IMPLEMENTATION OF CRIMINAL SANCTIONS IN
CORRUPTION CASE (CASE STUDY OF DECISION
REG.24/PID.SUS.TPK/2020/PN PAL)****Muhammad Zulfikar¹, Jubair², Benny Diktus Yusman³,
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Abstract

The formulation of the problem in this study is 1) How is the application of criminal sanctions against corruption based on Reg.24/Pid.Sus.TPK/2020/PN PAL?. 2) What is the basis for the judge's consideration in determining the defendant's guilt in a corruption crime based on Reg.24/Pid.Sus.TPK/2020/PN PAL?. This study aims to find out the application of criminal law to defendants of corruption based on the decision of Reg.24/Pid.Sus.TPK/2020/PN PAL. To find out the judge's considerations in determining the defendant's guilt in the criminal act of corruption based on the decision of Reg.24/Pid.Sus. TPK/2020/PN PAL. This research uses normative law research methods (doctrinal legal analysis). The conclusions in this study are The application of sanctions in the Corruption Crime of Decision Number Reg.24/Pid.Sus.TPK/2020/PN Pal. It is not appropriate that the Panel of Judges stated that the defendant was proven

guilty as stated in the primary charge as regulated in Article 2 paragraph (1) jo. Article 18 of Law no. 31 of 1999 in conjunction with Law no. 20 of 2001 concerning the Eradication of Criminal Acts of Corruption. The direct indictment is not appropriate because the defendant's actions in the element of a criminal act of corruption are abusing the authority regulated in Article 3 of Law no. 31 of 1999 in conjunction with Law no. 20 of 2001 concerning the Eradication of Corruption fulfills the element of the offense as stated in the subsidiary indictment. The judge's consideration in deciding on the criminal act of corruption committed by the defendant as stated in the decision Number Reg.24/Pid.Sus.TPK/2020/PN Pal is not appropriate because it is under legal consideration by the judge. 20 of 2001 concerning the Eradication of Criminal Acts of Corruption. The direct indictment is not relevant because the defendant's actions in the element of a criminal act of corruption are abusing the authority regulated in Article 3 of Law no. 31 of 1999 in conjunction with Law no. 20 of 2001 concerning the Eradication of Corruption fulfills the element of the offense as stated in the subsidiary indictment. The judge's consideration in deciding on the criminal act of corruption committed by the defendant as stated in the decision Number Reg.24/Pid.Sus.TPK/2020/PN Pal is not appropriate because it is under legal consideration by the judge. 20 of 2001 concerning the Eradication of Corruption. The direct indictment is not relevant because the defendant's actions in the element of a criminal act of corruption are abusing the authority regulated in Article 3 of Law no. 31 of 1999 in conjunction with Law no. 20 of 2001 concerning the Eradication of Corruption fulfills the element of the offense as stated in the subsidiary indictment. The judge's consideration in deciding on the criminal act of corruption committed by the defendant as stated in the decision Number Reg.24/Pid.Sus.TPK/2020/PN Pal is not appropriate because it is under legal consideration by the judge. 20 of 2001 concerning the Eradication of Corruption. The direct indictment is not relevant because the defendant's actions in the element of a criminal act of corruption are abusing the authority regulated in Article 3 of Law no. 31 of 1999 in conjunction with Law no. 20 of 2001 concerning the Eradication of Corruption fulfills the element of the offense as stated in the subsidiary indictment. The judge's consideration in deciding on the criminal act of corruption committed by the defendant as stated in the decision Number Reg.24/Pid.Sus.TPK/2020/PN Pal is not appropriate because it is under legal consideration by the judge. 20 of 2001 concerning the Eradication of Corruption fulfills the offense element stated in the subsidiary indictment. The judge's consideration in deciding on the criminal act of corruption committed by the defendant as stated in the decision Number Reg.24/Pid.Sus.TPK/2020/PN Pal is not appropriate because it is under legal consideration by the judge. 20 of 2001 concerning the Eradication of Corruption fulfills the offense element stated in the subsidiary indictment. The judge's consideration in deciding on the criminal act of corruption committed by the defendant as stated in the decision Number Reg.24/Pid.Sus.TPK/2020/PN Pal is not appropriate because it is under legal consideration by the judge.

Keywords: *Application of Criminal Sanctions; Corruption Crime*

INTRODUCTION

Corruption in Indonesia is a phenomenon that has damaged the joints of people's lives and the state. Corruption in Indonesia has been categorized as dangerous. The nation's emergency problems faced by the Indonesian state from time to

time for a relatively long period have not been adequately resolved. Still, the perpetrators of criminal acts of corruption are present in this country as invaders who are enemies of all elements of society. Law enforcers are expected to help reduce the number of corruption by implementing

repressive law enforcement.

From a sociological point of view, corruption in Indonesia can be divided into three models. First, corruption by need, meaning that people commit corruption due to circumstances or conditions. Second, corruption is due to greed (corruption by desire), meaning that people do corruption because they are greedy even if they are economically sufficient. Third, corruption by chance, suggesting that corruption is carried out or occurs because of an opportunity.¹The problem is, can corruption be eradicated? If we want to progress, there is no other answer: corruption must be eradicated. If we do not succeed in eradicating corruption, or at least reducing it to its lowest point, do not expect this country to catch up with other countries to become a developed country because corruption has a relatively broad negative impact and can pay the country to the brink of destruction.²Corruption is included as a great crime because it not only affects the financial and economic joints of the country but has damaged the pillars of culture, socio-politics, security, and public order, and the integrity and unity of the state are also threatened. . The term

¹Pradjonggo Tjandra Sridjaja, *Unlawful Nature in the Crime of Corruption*, Indonesia Lawyer Club, Jakarta, 2010, p. 1.

²Soedarso Boesono, *Historical and Cultural Background in Indonesia*, UII Pers, 2010, p. 8.

corruption comes from the Latin "corruption" or "corruptus" which means: damage or depravity.³

A criminal act of corruption is a crime related to bribery and manipulation and other actions that can harm the country's economy harm the welfare and interests of the people. Corruption increases along with the progress of prosperity and technology.⁴ The crime of corruption is a crime which is an extraordinary crime that has concretely endangered state finances and also harmed the country's economy.⁵

Corruption is a serious problem; this crime can endanger the stability and security of society, endanger socio-economic development and politics, and damage democratic values and morality because, gradually, this act seems to become a culture. Corruption is a threat to the ideals of a just and prosperous society.⁶In Indonesia and other parts of the world, corruption is getting more attention, especially compared to other crimes. This phenomenon

³M. Prodjohamidjoyo, *Understanding the Basics of Indonesian Criminal Law*, Pradnya Paramita, Jakarta, 2001, p. 7.

⁴Andi Hamzah, *Comparison of Corruption Eradication in Various Countries*, PT. Sumber Ilmu Jaya, Jakarta, 2002, p. 1.

⁵Hartadhi Christianto, "Implementation Of Government And Regional Security Team And Security Team In The Framework Of Corruption Crime Prevention In Morowali Regency," *Tadulako Master Law Journal* 3, no. 3 (23 October 2019): 306–30. Accessed 21 February 2022.

⁶Evi Hartanti, *Corruption Crime*, Sinar Graphic, Jakarta, 2005, p. 1.

or phenomenon must be understandable, considering the negative impact caused by criminal acts of corruption that can distort various national and state lives of a country, even on life between nations.⁷

At first, people understand corruption by using a dictionary language, which comes from Greek and Latin "corruption." From Latin *corruptio*, corruption in Dutch. Corruption is not only used to indicate a bad situation or act; it is also related to someone's dishonesty in the financial sector.⁸The above definition is a straightforward understanding, which cannot be used as a benchmark or standard for acts of corruption as a criminal act, which by Lubis and Scott in their view that: In the legal sense corruption is behavior that benefits oneself at the expense of others, by government officials who directly violate legal limits on such conduct; whereas according to government norms it can be considered corruption if there is a violation of the law or not, but in business this action is despicable.⁹And those who commit such disgraceful actions must be investigated and detained. The corruption crime is one of the crimes classified as

extraordinary crimes; therefore, the Government and Society today are severe. Fighting corruption, in addition to carrying out development in all fields.¹⁰Cases of criminal acts of corruption in Indonesia have developed widely in the community; their development continues to increase from year to year both in terms of the number of cases that occur, the amount of state financial losses even in terms of the quality of criminal acts that are carried out systematically and their scope enters all aspects of people's lives. Sociologically, according to Marwan Mas, three types of corruption are as follows:¹¹Corruption because of need, Corruption to enrich oneself, and Corruption because of opportunity. According to Kartono, corruption is the behavior of individuals who use their authority and position to make personal gains, harming the public and state interests. So corruption is for personal gain, mismanagement of power, and state resources by using formal authority and capabilities (e.g., because of law and force of arms) to enrich oneself.¹²

⁷Soetanto Soepiady, *The Indonesian Proper Movement*, Opinion Weekly, Suara Sehati Column, Jakarta, 2005, p. 2.

⁸Sudarto, *Law and Criminal Law*, Alumni, Bandung, 1996, p. 115.

⁹M. Lubis and JC Scott, *Political Corruption*, Indonesian Torch Foundation, Jakarta, 1997, p. 19.

¹⁰Cokorda Dian Permana, "Formal And Material Responsibility Of The Assistant Expenditure Changes In State Financial Compensation In The Criminal Action Of Corruption," *Tadulako Master Law Journal* 4, no. 3 (August 30, 2020): 318–46. Accessed February 21, 2022.

¹¹Marwan Mas, *Eradication of Criminal Acts of Corruption*, Ghalia Indonesia, Jakarta, 2014, p. 12.

¹²Kartini Kartono, *Social Pathology*, Raja Grafindo Persada, Jakarta, 2003, p. 80.

Corruption as a phenomenon of deviation in social, cultural, social, and state life has been studied and critically studied by many scientists and philosophers. Aristotle, for example, followed by Machiavelli, has formulated what he calls moral corruption.¹³

The phenomenon of the culture of corruption in this country is rampant. Corruption is carried out by state administrators, between state administrators. It involves other parties such as families, cronies, and business people, thereby damaging the joints of social, national, and state life, which can endanger the existence of state administration. Seeing the phenomenon regarding the criminal act of corruption above makes the community stigma bad. The public's view of law enforcement efforts can be inaccurate. Sanctions given to perpetrators of criminal acts of corruption have not been able to frighten the next corruptors to commit criminal acts of corruption. The efforts made by the government are felt to be not enough to make state administrators discouraged from committing corruption. Based on the background described above, the writer is interested in writing a thesis with the title: Overview of the Application of Criminal

Sanctions in Criminal Acts of Corruption (Case Study of Decision Reg.24/Pid.Sus.Tpk/2020/PN Pal)

Formulation of the problem

How is the application of criminal sanctions against corruption based on Reg.24/Pid's.Sus.TPK/2020/PN PAL?

The basis for the judge's consideration in determining the defendant's guilt in the corruption crime is based on Reg.24/Pid.Sus.TPK/2020/PN PAL?

ANALYSIS AND DISCUSSION

Application of Criminal Sanctions Against Corruption Crimes Based on Decisions Reg.24/Pid.Sus.TPK/2020/PN PAL

Law has a significant and dominating position in people's lives, especially in the unitary state of the Republic of Indonesia. Law is an instrument that can play a proper role in people's lives if authorities support the implementation system in law enforcement. One of those powers is the prosecutor's office. According to LM Friedman, the legal system is composed of legal sub-systems in legal substance, legal structure, and legal culture. In this case, the three elements play an essential role in determining whether a country's legal system can work correctly or make the sub-system not work as it should. The legal

¹³Albert Hasibuan, Point of View for the New Order, Sinar Harapan Library, Jakarta, 1997, p. 342-347.

substance is usually closely related to aspects of statutory legal arrangements. The emphasis, the legal structure, is more on the legal apparatus and facilities and infrastructure itself. Meanwhile, legal culture also concerns the behavior of its people.

Case Position

That the Defendant DRS. SUHARIONO, as Plt. The principal of SMA Negeri 3 Poso based on the Order of the Head of the Education and Culture Office of Central Sulawesi Province Number 090/29.281/SKK/DIKBUD dated June 2018 and based on the Decree of the Governor of Central Sulawesi Province Number: 188.45/0110/2017 dated February 18, 2019, concerning Appointments in the position of the Principal at SMA and SMK within the Central Sulawesi Provincial Government, between June 2018 and June 2019 (The school Year 2018/2019 Period), located at the SMA Negeri 3 Poso Office, Poso Regency, Central Sulawesi Province Jalan Pulau Seram No.

- That Defendant, around June 2018, continued the actions of the previous Principal of SMA Negeri 3 Poso, namely Mr. Drs. ALDJUFRI S. MAHMUD is mainly concerned with:
 - a. Committee Fees
- Whereas Defendant imposes a levy on the payment of Committee Money in

the amount of Rp. 70.000,00 (seventy thousand rupiah) for all students of SMA Negeri 3 Poso every month, which is binding in terms of the amount and time of collection, where Defendant was appointed as Plt. The Principal of SMA Negeri 3 Poso in the current academic year, namely June 2017/2018, so that Defendant decided on all activities in the Poso State High School, the Defendant continued and continued without further reviewing whether habits or activities were already ongoing. Before Defendant served as Plt. The principal is correct or not against the rules of law relating to education funding;

- Each student is given a School Committee Card, which includes the identity of the students and the amount of Committee Fund payments that must be paid by students each month, which card is intended as proof of payments made by students after the committee treasurer has signed/initialized. Receipt of money from students that as for the payment of committee funds by students the payment can be through the homeroom teacher to be further forwarded to the Treasurer of the Committee An. Witness ROSMINAH, S.Pdi. or direct students who make

payments to the committee treasurer for later storage by Witness ROSMINAH, Spdi. as treasurer of the committee in the school safe.

- Whereas Defendant, as the head of the school, implements the committee money collection mechanism by giving directions/announcements/reminding the students when the Defendant is the principal as well as the supervisor of ceremonies every Monday or through homeroom teachers/teachers to be further conveyed to students regarding the obligation to pay money the committee funds, with the consequence that if students do not pay the committee funds later, they will not be included in the upcoming semester exams, so with this notification the students feel afraid and tell their parents/guardians to always comply with making payments on time and if not then the next payment will be made at once with the pending one;

The rulings, in this case, include the following:

JUDGE

1. Stating the Defendant, Br. Drs. The SUHARIONO, as mentioned above, has not been legally and convincingly proven guilty of committing a crime as charged in the First and Second Indictments;

2. Release the Defendant, Br. Drs. SUHARIONO therefore of all the Indictments of the Public Prosecutor;
3. Restoring the rights of Defendant, Mr. Drs. SUHARIONO in his ability, position, prestige, and dignity;
4. Determine evidence in the form of documents/letters, namely:
 - 1) 2 (two) photocopies of the Budget and Expenditure plan of the SMA Negeri 3 Poso Committee for the 2017/2018 academic year;
 - 2) 2 (two) photocopies of the Budget and Expenditure Plan of the SMA Negeri 3 Poso FY 2018/2019 Committee;
 - 3) 3 (three) copies of 2017/2018, 2018/2019, and 2019/2020 Committee Fees Cards;
 - 4) 3 (three) copies of the recapitulation of the Budget Plan and Enrichment Costs for Class XII Students for the 2018/2019 Academic Year;
 - 5) 1 (one) photocopy of the Registration Receipt Number: 176, in the amount of Rp. 1.210,000.- dated June 14, 2017 and 1 (one) sheet of 2019 Registration Receipt;
 - 6) 1 (one) Copy of Teacher Incentives and Administrative Staff of SMA Negeri 3 Poso for the 2017/2018 Academic Year;

- 7) 1 (one) Photocopy of Incentives for Teachers and Administrative Employees of SMA Negeri 3 Poso for the 2018/2019 Academic Year;
 - 8) 1 (one) Copy of the List of Institutional Development Fund Receipts (SPI) of SMAN 3 Poso for the 2018/2019 Academic Year;
 - 9) 1 (one) book of Reports on Receipts and Expenditures of Institutional Development Donations (SPI) for the 2017/2018 Academic Year and the 2018/2019 Academic Year;
 - 10) 1 (one) book of New Student Admissions for SMA Negeri 3 Poso. 2017/2018 Academic Year and 2018/2019 Academic Year;
 - 11) 1 (one) book on the List of Tuition Fees for Poso State Senior High School 3 for the 2018/2019 academic year;
 - 12) Photocopy of the Socialization Material for Central Sulawesi Governor Regulation Number 10 of 2017 by Drs. ALDJUFRI S. MAHMUD on 23 May 2017;
 - 13) Photocopy of Socialization Materials for the Development of SMA Negeri 3 Poso for the 2018/2019 Academic Year;
 - 14) Photocopy of UN and UNBK Socialization Materials and Lessons for SMA Negeri 3 Poso for the 2017/2018 academic year;
 - 15) Photocopy of UN and UNBK Socialization Materials as well as Poso 3 State Senior High School Lessons for the 2018/2019 Academic Year;
 - 16) Photocopy of the Decree of the Head of SMA Negeri 3 Poso Number: KEP- 01/SMAN.3/2019 concerning the Division of Tasks and Additional Tasks for Teachers in Learning Activities or Guidance and Counseling for the Even Semester of the 2018/2019 Academic Year at SMA Negeri 3 Poso;
- returned to from whom the evidence was confiscated;
5. Charges the State to pay court fees in the amount of Rp. 5,000.00 (five thousand rupiah);
- This was decided in the deliberation session of the Panel of Judges for the Corruption Court at the Palu District Court, on Friday, October 16, 2020, by Hj. Aisa Hi. Mahmud, SH., MH as Chief Judge, Boniface Nadya Arybowo, SH.MH.Kes. and Darmansyah, SH.MH, Judge Ad Hoc Judges for the Crime of Corruption, each as Member Judges, spoken in a trial open to the public on Tuesday, October 20, 2020, by the Chief

Judge accompanied by the Member Judges, assisted by Bertin, SH, MH., Substitute Registrar of the Corruption Court at the Palu District Court, and was attended by the Public Prosecutor and the Defendant accompanied by the Defendant's Legal Advisor.

The basis for Judges' Consideration in Determining the Defendant's Errors in the Crime of Corruption Based on the Decision Reg.24/Pid.Sus.TPK/2020/PN PAL

Judges, who in this case are the central figures in the court process, are always required to learn moral sensitivity, maintain moral intelligence and increase professionalism in upholding law and justice for all levels of society as a whole without exception. The judge acting as an independent and impartial person is expected to rectify everything that, according to the defendant's feelings, has occurred unilaterally, half-truly. The officers carried out an inappropriate attitude before the court session.

In the case of corruption, many factors are used as the basis for a judge's consideration in deciding acquittal if it is not proven to have committed a crime. There is not enough evidence to determine the severity of the crime imposed on the perpetrator of a criminal act of corruption if it

is proven to have committed a criminal act. Based on the power of the judiciary, the judge can determine how much punishment is appropriate for the perpetrators of criminal acts of corruption based on justice, so that according to Article 50 paragraph 1 of Law No. 48 of 2009 firmly that all court decisions must contain the reasons and basis for the decision, including specific articles of the relevant laws and regulations or unwritten sources of law that are used as judges to try, and the judge's obligation to give sufficient consideration to the decisions handed down to limit the occurrence of arbitrary acts from the judges.

In his decision, the judge must state which acts of the defendant, based on the facts revealed in court, meet the formulation of certain articles of legislation, in the basic research of the judge's consideration of the criminal act of corruption which was decided at a minimum specifically at the Palu District Court, the judge's decision must include the act defendants who fulfill the formulation of the criminal act of corruption are contained in article 3 of the Republic of Indonesia Law No. 20 of 2001 concerning Amendments to Law no. 31 of 1999 concerning the Eradication of Criminal Acts of Corruption, which reads: "Every person who, with the aim of bene-

fitting himself or another person or a corporation, abuses his authority, opportunities or facilities available to him because of his position or position which can harm state finances or the state economy, shall be punished with life imprisonment or a minimum of 1 (one) year and a maximum of 20 (twenty) years and or a minimum fine of Rp. 50,000 .000,00 (fifty million rupiah) and a maximum of Rp. 1,000,000,000.00 (one billion rupiah).”

If viewed from the article, the judge can impose a minimum sentence of 1 year in prison and Rp fine. 50,000,000.00 (fifty million rupiah) and a maximum penalty of 20 years, and a maximum fine of 1,000,000,000.00 (one billion rupiah). As referred to in article 3, the criminal act of corruption is a formal offense, as is the crime of corruption as referred to in article 2 paragraph (1).

CONCLUSION

1. Application of sanctions in Corruption Crimes on Decision Number Reg.24/Pid.Sus.TPK/2020/PN Pal. It is not appropriate that the Panel of Judges stated that the defendant was proven guilty as stated in the primary charge as regulated in Article 2 paragraph (1) jo. Article 18 of Law no. 31 of 1999 in conjunction with Law no. 20 of 2001

concerning the Eradication of Criminal Acts of Corruption. The direct indictment is not appropriate because the defendant's actions in the element of a criminal act of corruption are abusing the authority regulated in Article 3 of Law no. 31 of 1999 in conjunction with Law no. 20 of 2001 concerning the Eradication of Criminal Acts of Corruption fulfills the element of the offense as stated in the subsidiary indictment.

2. The judge's consideration in deciding on the criminal act of corruption committed by the defendant as stated in the decision Number Reg.24/Pid.Sus.TPK/2020/PN Pal is not appropriate because in legal considerations by the judge, the defendant's actions enrich himself, resulting in losses. State finances or the state economy are inappropriate and do not pay attention to mitigating reasons. Thus, the judge's decision is not correct.

BIBLIOGRAPHY

- Albert Hasibuan, Point of View for the New Order, Sinar Harapan Library, Jakarta, 1997.
- Andi Hamzah, Comparison of Corruption Eradication in Various Countries, PT. Sumber Ilmu Jaya, Jakarta, 2002.

- Evi Hartanti, *Corruption Crime*, Sinar Graphic, Jakarta, 2005.
- Kartini Kartono, *Social Pathology*, Raja Grafindo Persada, Jakarta, 2003.
- M. Prodjohamidjoyo, *Understanding the Basics of Indonesian Criminal Law*, Pradnya Paramita, Jakarta, 2001.
- M. Lubis and JC Scott, *Political Corruption*, Indonesia Torch Foundation, Jakarta, 1997.
- Marwan Mas, *Eradication of Criminal Acts of Corruption*, Ghalia Indonesia, Jakarta, 2014.
- Pradjonggo Tjandra Sridjaja, *Unlawful Nature in Corruption Crimes*, Indonesia Lawyer Club, Jakarta, 2010.
- Soedarso Boesono, *Historical and Cultural Background in Indonesia*, UII Pers, 2010.
- Soetanto Soepiadhy, *The Indonesian Proper Movement*, Opinion Weekly, Suara Sehati Column, Jakarta, 2005.
- Sudarto, *Law and Criminal Law*, Alumni, Bandung, 1996.
- Indonesian Criminal Code Law Number 20 of 2001 concerning the Eradication of Corruption Crimes.
- Law Number 48 of 2009 concerning Judicial Power.
- Law Number 17 of 2003 concerning the Rights and Obligations of the State which can be Valued in Money.
- Cokorda Dian Permana, "Formal And Material Responsibility Of The Assistant Expenditure Changes In State Financial Compensation In The Criminal Action Of Corruption," *Tadulako Master Law Journal* 4, no. 3 (August 30, 2020): 318–46. Accessed February 21, 2022.
- Hartadhi Christianto, "Implementation Of Government And Regional Security Team And Security Team In The Framework Of Corruption Crime Prevention In Morowali Regency," *Tadulako Master Law Journal* 3, no. 3 (23 October 2019): 306–30. Access 21 February 2022.
