

LAW ENFORCEMENT BY THE POLICE CODE OF ETHICS COMMISSION: AN ANALYSIS OF LEGAL CERTAINTY IN IMPOSING SANCTIONS

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Abstract

Each country has its own characteristics and security conditions so that the format and style and police system in a country are also different. The most important in the police is how to build a paradigm of accountability to the substance and not to the place. The research is a normative law research, using normative case studies in the form of legal behavior products, by reviewing laws. The results show that the handling of violations by the Police Professional Code of Ethics Commission is still said to be not optimal and fair because it is seen from the implementation of policies based on authority that are not carried out independently and can still be intervened. It shows that the public assessment of law enforcement within the Police institution is still not fair. The guarantee of legal certainty and neutrality of law enforcement in decision-making at the Police Ethics Commission hearings was initiated with the novelty concept in this study which pays attention to policy improvement as a form of legal certainty in enforcing the Police Profession Code of Ethics Commission. Even though the rules regarding the Police Profession Code of Ethics and the formation of a police profession code of ethics commission are in a new regulation. Therefore, it is necessary to add substance to the existing rules, especially to prevent power intervention.

Keywords: Ethics; Legal Certainty; Sanction; Police

1. INTRODUCTION

In many democratic countries, the position of Police has always been in operational organizers, whether in related-departments, establishing own departments or creating their own ministries specifically dealing with domestic security issues. However, each country has its own characteristics and security conditions so that the format and style and police system in a country are also different. The most important in the police is how to build a paradigm of accountability to the substance and not to the place. The position of the police can be measured to what extent the accountability of the Police can be accounted for. It means that the chances of remaining in the current position are great as long as active supervision can be performed.¹

In comparison, a country like France also has a Police Code of Ethics. This is regulated in the rules of the Code of Ethics for the police and *Gendarmerie* in France. The police and *Gendarmerie* are subject to the oversight of the authorities designated by law and international agreements. Carrying out the duties of the judiciary, police and *Gendarmerie* are subject to the oversight of the judicial authorities.² If police and *Gendarmerie* personnel violate any of the rules and principles prescribed by this code, they shall be subject to disciplinary action in accordance with the rules specific to their status, irrespective of criminal proceedings where

appropriate. Polri as a sub-system of government has endeavored responsively to contribute to realizing the principles of *good governance* and *clean government* both in carrying out the main tasks of maintaining security and public order, enforcing the law and protecting, nurturing and serving the community as well as within internal circles as proclaimed in grand strategy of police is *Trust building*. In related to the police professionalism, with a foundation of moral ethics, broad knowledge, and high technical capabilities, the police profession will remain to be praised and respected by the community.

The complexity of duties of police in the reform era and its journey has benefited the institution and significant progress in build strength, coaching and operations. However, on the other hand, it is honestly acknowledged that there is negative access to the implementation of their main duties in the form of deviations from the behavior of members of the police such as abuse of power and committing other disgraceful acts that violate moral, social and religious norms.

Efforts to uphold discipline and the Police code of ethics are urgently needed in order to realize the implementation of assigned duties and achieve the professionalism of the police. It is very unlikely that law enforcement can run well if the law enforcers themselves are undisciplined and unprofessional.³ The indiscipline and unprofessionalism of the Police will greatly impact law enforcement or disclosure of crimes that occur in society.

Deviation of members of the police is an act that violates the police discipline regulations that have been regulated in the Police Regulation No. 14 of 2011 concerning the Police Code of Ethics and Government Regulation No. 2 of 2003 concerning Disciplinary Regulations for Members of the Indonesian National Police. The Disciplinary Regulations for Members of the Indonesian National Police are not only based on professional needs, but have also been regulated normatively.⁴

In practice, the many cases of disciplinary and criminal violations committed by members of the police indicates that the members of the police are not yet professional, this results in disappointment in the community about the vision, mission, duties, authority possessed by the Indonesian National Police, weakening conditions of discipline and the professionalism of members of the police which is happening at this time is starting to frequently become the talk of the wider community.

Reports in various mass media about disciplinary actions committed by members of the Police, for example misuse of firearms by members of the Police, there are members of the Police involved in criminal acts, arbitrary actions by members of the Police, and there are many other cases that illustrate the lack of the discipline of members of the Police, makes their own concern for the community concerned in carrying out the main duties of the Police, namely maintaining security and public order, order and upholding the law, the implementation of protection, protection and service to the community, as well as fostering public peace by upholding human rights.

In a democratic system, the special rights of the Police are not only subject to applicable law, but also to the Code of Ethics as an aspect of the police force. The Police Code of Ethics is a norm regarding police behavior to be used as a guideline in carrying out good duties for public

order, public security, and law enforcement. Police profession is one of the professions whose demands involve fulfilling the moral values of its members. This moral value is the strength to underlie all actions taken wisely and prudently in providing services in the field of law in a professional manner to the community with the totality and expertise they have in order to carry out their duties as legal servants to people in need.⁵

Many ethics committee decisions against members of the Police that violate the code of ethics still have a double standard, some are severely punished, some are only given light sentences, some are dismissed, some are only given light disciplinary punishment, so that the standard of legal certainty is not guaranteed in making decisions related to disciplinary violations by the Police. Based on this, then a study of the certainty of guaranteeing legal certainty regarding decisions against violations of the police code of ethics must be reviewed. At the implementation level to apply the police code of ethics, a body was formed whose task was to examine and decide cases in violation trials according to the level of rank, this forum was called the commission for the police profession code of ethics.

The results of observations based on *das sein* show several issues related to the existence of a Police Code of Ethics Commission, especially regarding handling cases and guaranteeing legal certainty. Members of the Police Professional Code of Ethics Commission are still structural and not functional so the space for intervention is still wide open. The existence of this intervention space weakens the independence of the Code of Ethics Commission in making decisions on disciplinary violations and legal violations related to membership of the Indonesian National Police.⁶ Likewise, the results of preliminary observations and research at the North Sulawesi Regional Police, the Code of Ethics Commission still has many interests intervening so that the intersection between disciplinary violations and violations of the Police professional code of ethics is still vague which has an impact on violations that fall into the category of disciplinary violations and also the code of ethics.

An example of a case that is becoming a hot phenomenon that is currently being raised is the case of a violation of the code of ethics by a member of the Police named AKBP Raden Brotoseno. The former investigator of Corruption Eradication Commission was previously detained at Cipinang Class 1 Prison since 18 November 2016 in connection with a corruption case involving a fictitious rice field in Ketapang, West Kalimantan. Although, the police revealed that AKBP Raden Brotoseno was still a member of the police. He was not fired from his position even though he was caught in a corruption case and was jailed for 2017-2020.

Brotoseno has undergone trial (code of ethics and profession) but there was no dismissal. Brotoseno's status has been in the spotlight after the Indonesia Corruption Watch (ICW) revealed allegations that he was returning to work as an investigator for the National Police's Criminal Investigation Agency. ICW suspects Brotoseno has returned to work at the police by holding the position of Associate Investigator at the Directorate of Cybercrime. After it was spread to several media and became a hot topic of public discussion, finally in 2022 AKBP Brotoseno was officially dismissed or fired. This should have been implemented in 2016 but can only be fired in 2022.

The implementation of the duties and functions of the Police, the measure of the success of the Police is seen from the level of public trust in the Police's performance. Public trust will be built by seeing the success of the task, the improvement of services and the conducive and controlled domestic security and order situation. However, the good image of the Police will be tarnished if there are members of the Police who violate the code of ethics. Violations of the Police Profession Code of Ethics must be handled and resolved professionally and responsibly based on applicable provisions as a guarantee of legal certainty.

2. METHODOLOGY

The research is a normative law research, using normative case studies in the form of legal behavior products, by reviewing laws.⁷ The author using statutory, conceptual and philosophical approaches.⁸ This paper applied the qualitative method and conceptual, historical, as well as comparative approach through a literature review to examine the issue discussed. This paper provides information on the latest trend in research.

3. RESULTS AND DISCUSSION

3.1. Legal Policy the Formation of a Profession Code of Ethics Commission: A Study of Police Discretion in Realizing Justice

The Police Code of Ethics Commission is a forum established within the Police whose task is to examine and decide cases in trials of violations of the Police Profession Code of Ethics by rank level. The National Police Chief has the authority to form a Police Code of Ethics Commission to examine violations of the Police Code of Ethics committed by all police members, including the National Police Senior Officer and Police Chief Commissioner who hold the positions of Deputy Chief of Police or *Irwanda*. In this case the Police Code of Ethics Commission reports on the implementation of its duties to the Forming Officer of the Police Code of Ethics Commission.⁹

The trial of the Police Code of Ethics Commission against members who commit criminal acts can be carried out if there has been a decision from the general court which has permanent legal force,¹⁰ because if the Code of Ethics Commission session is held prior to a trial in general court, then the decision from the Police Code of Ethics Commission will become legally flawed, whereas if the administrative sanction to be imposed is in the form of a Dishonorable Dismissal recommendation, then the matter is decided through the KKEP session after first proving the criminal offense through the general court process up to a court decision that has legal force.

In relation to the aforementioned crimes, for example the provisions regarding criminal law related to murder in Article 338 of the Indonesian Criminal Code, where murder is punishable by a criminal penalty of 15 years in prison (more than 4 years), then of course a general court process must be carried out first before the trial of the Police Code of Ethics Commission. Based on the criminal justice system in accordance with Article 2 of Government Regulation No. 3 of 2003 concerning the Technical Implementation of General Court Institutions, members of the Police who commit various forms of crime can be reported to the Police Service Center at the

nearest police station, so that they can be processed according to the applicable procedural law in the public court environment. Members of the police avoid disgraceful acts that could damage the honor of their profession and institution.

This action can be categorized as action that violate police ethics, because the police should can avoid themselves from disgraceful acts. Violations of police ethics can be reported to the Police Service Center, while the code of ethics violations allegedly committed will be followed up separately by the Police Propam Division. KKEP is only tasked with examining and deciding on violations of the code of ethics by members of the Police and not disciplinary violations so that the determination of disciplinary violations or code of ethics violations is carried out by the legal field after receiving a request for advice and legal opinion from the provost.

Apart from being regulated in the regulations of the police code of ethics, the behavior of members is also regulated in disciplinary regulations which must be obeyed.¹¹ If the member violates the disciplinary rules, the member will be subject to disciplinary sanctions. Members who violate disciplinary regulations may be subject to sanctions in the form of disciplinary action or disciplinary punishment.

Police disciplinary violations, the imposition of disciplinary punishment is decided in a disciplinary hearing and if the police commit crimes such as rape, assault, and murder of civilians, then the police have not only committed a crime, but have also violated the discipline and code of ethics.¹² As with the legal process for police officers who commit criminal acts, violations of disciplinary rules and the code of ethics will be examined and if proven, sanctions will be imposed. The imposition of disciplinary sanctions and sanctions for violating the code of ethics does not eliminate criminal charges against the police officer concerned. Therefore, the police who commit these crimes will still be criminally processed even though they have undergone disciplinary sanctions and sanctions for violating the code of ethics.

In the research case, the case started with a meeting between Dahlan Iskan's family and Suhendro Boroma, the managing director of PT. Jawa Pos National Network (JPNN). The meeting discussed the matter of Dahlan being summoned by investigators from the Corruption Crime Directorate of the Police. He was summoned for questioning as a witness in the case of *Cetak Sawah* in Ketapang, West Kalimantan. Suhendro then asked for help from Harris Arthur Hedar as the corporate legal group for Jawa Pos at that time to arrange the postponement of Dahlan summons. Harris then contacted a businessman named Lexi Mailowa. In a meeting, Harris asked about the potential fee that would arise from managing the postponement of Dahlan's summons. Lexi replied that maybe some money was needed as a gift. Harris then met with Suhendro to discuss the costs of delaying Dahlan's summons. In the meeting, Harris mentioned the operational costs of up to Rp. 6 billion. Suhendro, through PT. JPNN, then borrowed money from PT. Kaltim Energy Power, a company owned by Dahlan Iskan, for Rp. 25 billion. Apparently, around Rp. 6 billion distributed to Harris on 12 August 2016 and Rp. 1.878 billion on 23 August 2016. Then, Harris sent Rp. 3 billion to Lexi for handling summon delays.

There are at least 3 (three) special requirements, namely they must be willing to cooperate with law enforcers to help uncover criminal cases they have committed, pay in full fines and compensation money in accordance with court decisions for convicts who have been convicted of committing corruption crimes, and take part in the deradicalization program and pledge allegiance to Indonesia in writing for Indonesian citizens and not repeat acts for foreigners for convicts of criminal acts of terrorism.¹³ Meanwhile, Article 43A paragraph 1 regulates special conditions for granting parole to convicts of corruption, terrorism, narcotics, serious human rights crimes and organized trans-national crimes.

The first, convicts are willing to cooperate with law enforcement to help uncover criminal cases they have committed, then have served at least 2/3 (two thirds) of the criminal period, provided that 2/3 (two thirds) of the criminal period is at least 9 (nine) months. The convict has also undergone assimilation of at least 1/2 (one half) of the remaining sentence period that must be served, and has shown awareness and remorse for the mistakes that led to being sentenced. Researcher from the UGM Center for Anti-Corruption Studies Zaenur Rohman questioned the granting of Justice Collaborator status so that Brotoseno could receive remission or parole. He considered it necessary to explain Brotoseno's position as main actor or not in the corruption case. This is because Justice Collaborator can only be given to actors who cooperate and are not main actors in corruption cases experienced by suspects, defendants or convicts.

Another case is the enforcement of the Police code of ethics who involved in the case of "Ferdy Sambo". The case of the premeditated murder committed by Inspector General Ferdy Sambo, former Head of the Indonesian National Police's Propam Division, against his aide Brigadier *J* or Yoshua Hutabarat has become a public concern in the last two months. Now the legal process continues. Ferdy Sambo, who was once a police officer has become a suspect. In addition, there are 4 (four) other suspects, namely Putri Chandrawati (Ferdy Sambo's wife), Bharada Richard Eliezer or Bharada E, Bripka Ricky Rizal or Bripka R, and Kuat Ma'ruf (Ferdy Sambo's driver). The chronology of the case of Brigadier *J*'s death began to emerge when Ferdy Sambo, who was previously Head of the Propam Division, made a report to the South Jakarta Metro Police on Friday, 8 July 2022. Ferdy Sambo reported that there was gunfire between Brigadier *J* and Bharada *E*. These shots were said to have taken place because Brigadier *J* sexually assaulted Putri Chandrawati, wife of Ferdy Sambo. There were 2 (two) reports made by Ferdy Sambo to South Jakarta Police with the suspected Brigadier *J*, namely the harassment of Putri Chandrawati and the attempted murder of Bharada *E*.

Efforts to uphold discipline and the Police Code of Ethics are urgently needed in order to realize the implementation of assigned duties and achieve the professionalism of the Police. It is very unlikely that law enforcement can run well if the law enforcers themselves (Police) are undisciplined and unprofessional.¹⁴ The indiscipline and unprofessionalism of the Police will greatly impact law enforcement or disclosure of crimes that occur in society. The firm attitude of a leader is needed by a large organization like the National Police. The police code of ethics in its implementation to prevent the abuse of police authority today is functioning and running as it should but not optimal, however many factors, there are still many violations of the code of ethics which are still often committed by members of the police. The code of ethics limits the

space for members of the Indonesian National Police to commit deviations within their authority. So that there are many factors that cause the code of ethics not to run optimally.

The principle of legality as an actualization of the paradigm of the rule of law is expressly stated in the details of the authority of the Indonesian National Police, namely to carry out investigations of all criminal acts in accordance with the criminal procedural law and other laws and regulations. However, preventive action is still prioritized through the development of a preventive principle and the general obligation of the police, namely maintaining security and public order. In this case, every official of the State Police of the Republic of Indonesia has discretionary authority, namely the authority to act in the public interest based on their own judgment. In preparing for the demands of an increasingly modern society and facing increasingly varied challenges as it is today, the Police must be able to prepare programs and all members are able to work to meet the demands of society.

Human resources and infrastructure began to be addressed and fulfilled by the government through an ever-increasing budget. In terms of increasing human resources, the police is trying to educate prospective members who truly meet the Police standards both intellectually and physically as well as personality. In terms of facilities and infrastructure, the provision of facilities and infrastructure to support tasks has been fulfilled by the government, such as vehicles and other equipment, which are expected to be able to answer challenges today.

In various kinds of duties and responsibilities placed on the shoulders of the National Police and the authority that is so broad and large, many members of the Police have intentionally or unintentionally abused this authority so that the National Police Commission (Komisi Kepolisian Nasional - *Kompolnas*) was formed which directly oversees the institution. However, all of this was felt by the Police to be insufficient, so to oversee the implementation of the duties of members of the Police in maintaining security and order, law enforcement and serving, protecting and protecting the community, an internal division was formed which was tasked with directly supervising, namely PROPAM which consisted of Police Provost, Police Professions and Police Paminal.

Decisions as result of solving a problem that must be faced firmly. In the Big Dictionary of Science that decision making is defined as choosing a decision or policy based on certain criteria.¹⁵ This process includes two or more alternatives because if there was only one alternative, no decision would be made. According to J. Reason, decision making can be considered as a result or output of a mental or cognitive process that leads to the selection of a course of action among several available alternatives. Every decision-making process always produces a final choice.

Other experts, namely Horold and Cyril O'Donnell¹⁶ say that decision making is the choice between alternatives regarding a way of acting, namely the essence of planning, a plan cannot be said to not exist if there is no decision, a reliable source, instructions or reputation that has been made, while Siagian defines decision making as a systematic approach to a problem, gathering facts and data, thorough research on alternatives and actions.

Decision making is a form of thinking and the result of an action. Decision making in cognitive psychology is focused on how a person makes decisions. In his study, it is different from problem solving which is marked by a situation where a goal is clearly defined and the achievement of a goal is broken down into sub-goal, which in turn help explain what actions should be taken. Decision making is also different from reasoning, which is characterized by a process by which people move from what they already know to further knowledge.

Based on definitions above, it can be concluded that decision making is a thought process from selecting alternatives that will be generated regarding future predictions. The function of individual or group decision making either institutionally or organizationally is futuristic. The purpose of decision making is a single goal (only one problem and not related to other problems). Multiple goals (problems are interrelated, can be contradictory or not contradictory). The activities carried out in the organization are intended to achieve organizational goals where it is desired that all activities run smoothly and goals can be achieved easily and efficiently. However, there are often obstacles in carrying out activities. This is a problem that must be solved by the leadership of the organization. Decision making is intended to solve the problem.

One of the goals of law is to achieve legal certainty. Legal certainty will be achieved if the law is enforced fairly, regardless of a person's rank and position. Likewise, police officers who have been proven to have committed a crime must be dealt with in accordance with applicable law. As discussed above, every criminal offense committed by a member of the Police is of course an act of disciplinary violation and a violation of the Police Profession Code of Ethics.

The research findings show that the Police regulations do not specifically regulate the submission of revisions to the Police regulations from the individual element. However, this does not mean that the Police do not receive input from outside parties. The National Police is open to receiving criticism, suggestions and critic for the development of the Police, especially if the input provided is the result of a philosophical, sociological or juridical study. As the procedure for drafting and revising Police regulations is handed over to the function developer as the initiator who then forms a working group to review the materials proposed for amendments to several articles.

According to Apeldoorn, legal certainty is said to have 2 (two) aspects, the first regarding the matter of the ability to form (*bepaalbaarheid*) law in concrete matters, it means that parties seeking justice want to know the law in particular terms before starting a case. The second, legal certainty means legal security, it means protection for the parties against the authority of the judge. Regarding the novelty concept proposed in this study, legal certainty is presented in the form of provisions in the form of enhanced policies by considering the balance of theory with what is needed. A concept article that contains what should be or describes the law that is aspired to (*ius constituendum*) from the background of the formation of the Police Profession Code of Ethics Commission, namely in line with the rapid development of technology and changes in ethical, cultural and behavioral values that occur in society influences the behavior of officials of the Indonesian National Police in carrying out their duties, responsibilities and authorities so that it is necessary to develop a professional code of ethics and form a commission for the Indonesian Police code of ethics.

4. IMPLICATIONS AND RECOMMENDATIONS

The handling of violations by the Police Professional Code of Ethics Commission is still said to be not optimal and fair because it is seen from the implementation of policies based on authority that are not carried out independently and can still be intervened. As in the case of AKP Raden Brotoseno. If look at the case of the Former Head of the Propam Division, Inspector General Ferdi Sambo, it actually built public understanding about cases that viral on social media, which were handled properly. It shows that the public assessment of law enforcement within the Police institution is still not fair. The guarantee of legal certainty and neutrality of law enforcement in decision-making at the Police Profession Ethics Commission hearings was initiated with the novelty concept in this study which pays attention to policy improvement as a form of legal certainty in enforcing the Police Profession Code of Ethics Commission. Even though the rules regarding the Police Profession Code of Ethics and the formation of a police profession code of ethics commission are in a new regulation, they are still considered weak because they have not been firm in preventing the intervention of power in making decisions in the sessions of the Police Profession Code of Ethics Commission. Therefore, it is necessary to add substance to the existing rules, especially to prevent power intervention.

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Declaration of Interest

Authors declare there are no competing interests in this research and publication.

References

1. Attard, Barbara. "Oversight of law enforcement is beneficial and needed-both inside and out." *Pace L. Rev.* 30 (2009): 1548.
2. Cawthray, Tyler, Tim Prenzler, and Louise E. Porter. "Updating international law enforcement ethics: International codes of conduct." *Criminal Justice Ethics* 32, no. 3 (2013): 187-209.
3. Indarti, Erllyn. "Strengthen security and public order: Accountability management in improving the quality of law enforcement." *Academic Journal of Interdisciplinary Studies* 9, no. 2 (2020): 82-88.
4. Marzuki, Peter Mahmud. 2014, *Penelitian Hukum Normatif*. PERNANADA MEDIA, Jakarta.
5. Muhammad, Abdulkadir. 2004. *Hukum dan Penelitian Hukum*. Bandung: Citra Aditya Bakti, 2004.
6. Ngaziz, Gusagis Khomanur. "Implementation of Pancasila and Law Enforcement Compliance with the Professional Code of Ethics." *Law Review* 22, no. 2 (2022): 162-182.
7. Prawira, Syailendra Anantya. "Election violation and election law enforcement in general election in Indonesia." *Jurnal Hukum Volkgeist* 4, no. 1 (2019): 25-34.
8. Puspita, Nestiti Aroma, Untung Sri Hardjanto, and Amiek Soemarmi. "Pelaksanaan Tugas dan Wewenang Komisi Kode Etik Kepolisian Republik Indonesia (Studi Kasus pada Kepolisian Daerah Jawa Tengah)." *Diponegoro Law Journal* 5, no. 3 (2016): 1-17.
9. Republique Francoise. 2014. Code of ethics of the police and the gendarmerie in France. *Journal Ministry of the Interior*. Article R. 434-23:

10. Satoto, Sukamto. "Membangun Kemandirian dan Profesionalisme Polisi Republik Indonesia Sebagai Pelindung Pengayom dan Penegak Hukum." *Inovatif, Jurnal Ilmu Hukum* 7, no. 3 (2014): 62
11. Sitompul, Ariman, and Pagar Hasibuan. "The Morality of Law Enforcement Agencies (Police, Prosecutor's Office, KPK) in Money Laundering with the Origin of the Corruption." *European Science Review* 9-10 (2021): 55-63.
12. Syamsi, Ibnu. 2000. *Pengambilan Keputusan dan Sistem Informasi*. Jakarta: Bumi Aksara.
13. Toule, Elsa Rina Maya. "Rule of Law and Rule of Ethic in Law Enforcement in Indonesia." *Journal SASI* 28, no. 1 (2022): 56-67.
14. Waluyo, Heru, and Evita Israhadi. "Enforcement of the Code of Ethics of the Chief of Police of the Republic of Indonesia Who Commits Criminal Decency." In *Proceedings of the 1st International Conference on Law, Social Science, Economics, and Education, ICLSSEE 2021, March 6th 2021, Jakarta, Indonesia*. 2021.
15. Winarno, Hadi, Bahrul Amiq, and Wahyu Prawesthi. "Law Enforcement on Drug Abuse Perpetrators committed by Indonesian Policemen." *Ius Positum (Journal of Law Theory and Law Enforcement)* (2023): 16-29.
16. Wyatt-Nichol, Heather, and George Franks. "Ethics training in law enforcement agencies." *Public Integrity* 12, no. 1 (2009): 39-50.
17. Abdulkadir Muhammad, *Hukum dan Penelitian Hukum*. Bandung: Citra Aditya Bakti, 2004. p. 52
18. Peter Mahmud Marzuki, 2014, *Penelitian Hukum Normatif*. PERNANADA Media, Jakarta, p. 137
19. Ibnu Syamsi. 2000. *Pengambilan Keputusan dan Sistem Informasi*. Jakarta: Bumi Aksara. 5.