

Research Article

Judges' Decisions Under the Minimum Criminal Penalty in Law Enforcement of Drug Crimes Based on the Perspective of Legal Certainty and Justice

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Abstract.

This study aims to find out and analyze the judge's decision under the minimum criminal threat in law enforcement of narcotics crimes based on the perspective of legal certainty and justice. It uses a normative legal approach method that is descriptive analytical in nature. The data used are secondary data obtained through literature studies, which are then analyzed qualitatively. Based on the study, it is concluded that the imposition of a Judge's decision below the minimum criminal threat in the enforcement of narcotics crime law shows a complex dynamic between legal certainty and justice. Narcotics crime is a serious issue that requires strict law enforcement. But the individual context of each case must also be considered. Legal certainty demands consistency and clarity, while the imposition of a decision below the minimum threat can raise doubts about justice. Judges need to consider mitigating factors, and a fair decision can reflect human values. It is important for judges to consider these aspects carefully in order to create a balance between legal certainty and justice.

Keywords: judge, law enforcement, minimum sentence, narcotics, verdict

1. Introduction

Narcotics are substances or drugs, both natural and synthetic, that can affect a person's psychological condition, especially consciousness, thoughts, moods, and behavior. Basically, narcotics are drugs that are needed in terms of health services, so their availability needs to be regulated, but on the other hand, narcotics can cause dependency if misused, so that they can cause physical, mental, social, security and order disorders in a society, which ultimately disrupts national resilience, so that the circulation of narcotics must be properly monitored (Lefri Mikhael, 2023).

Drug and illicit drug abuse can cause various negative impacts on the physical and mental health of users. Some of the impacts of drug abuse include changes in

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consciousness, hallucinations, addiction, damage to body organs, increased risk of infectious diseases, depression and suicidal tendencies. Drug abuse can damage the social structure of society, which can lead to increased crime rates, such as theft and violence, which are often related to the need to obtain drugs.

The existence of drug abuse in society creates a market or demand for narcotics. This then encourages the circulation and trade of narcotics to meet the demand for narcotics. Narcotics trafficking is a very profitable illegal business. This huge profit is the main motivation for drug syndicates to continue to circulate narcotics, even though it violates the law. The circulation or trade of narcotics is considered one of the serious crimes or criminal acts in the international world, including in Indonesia.

Drug abuse creates a wide network of victims, which not only involves individual users, but also families, communities, and various other parties. Some say that drug crimes are crimes without victims, where the perpetrators also act as victims. According to Tutty Alawiyah AS, drug crimes are one form of crime known as victimless crimes. In addition to narcotics, crimes without victims include gambling, alcohol, pornography, and prostitution (Moh. Taufik Makarao, 2003).

Drug abuse not only causes harm to the user himself, but also to others. The government, law enforcement officers and the community need to work together to prevent drug abuse, provide treatment and rehabilitation for addicts, and take firm action against drug dealers and producers.

As an effort to prevent drug abuse, eradicate illicit drug trafficking, and ensure the availability of drugs for health and scientific purposes, Law Number 35 of 2009 concerning Narcotics has been established. Given the increasingly concerning problem of narcotics and psychotropic drugs, it is necessary to monitor it early on and take integrated and effective countermeasures both at the national and international levels with law enforcement efforts against narcotics crimes (Mulkan., 2022).

Law Number 35 of 2009 as the legal basis for law enforcement of narcotics crimes, has regulated various types of narcotics crimes, ranging from production, distribution, to abuse of narcotics. For each crime, Law Number 35 of 2009 stipulates different criminal penalties, including minimum criminal penalties. The minimum criminal penalty is the limit of punishment that must be imposed by the Judge on the perpetrator of the crime. The purpose of determining the minimum criminal penalty is to provide a deterrent effect on the perpetrator and prevent the occurrence of narcotics crimes in the future.

In practice, judges often issue sentences below the minimum penalty. Judges' decisions that issue sentences below the minimum penalty can raise questions about the legal considerations used by the judge, and this has the potential to damage public trust in the justice system and create legal uncertainty.

In making a decision on a narcotics crime case, the Judge has the authority to consider things that can mitigate the defendant, such as the defendant's role in disclosing the narcotics case or the defendant's health condition. On the other hand, the imposition of a decision below the minimum criminal threat can be considered a form of injustice and legal uncertainty.

The purpose of this study is to describe and analyze the judge's decision under the minimum criminal threat in enforcing narcotics crime law based on the perspective of legal certainty and justice.

2. Methods

The type of research used in writing this legal journal is normative juridical, which is descriptive analytical. The data used in this study is secondary data. According to the data that has been obtained, it is then analyzed using qualitative data analysis.

3. Results and Discussion

Drug crimes in Indonesia are a very serious issue and are a major concern in law enforcement. Drug crimes include acts that violate the law, namely Law Number 35 of 2009. For the law that is violated, the law must be enforced and implemented, everyone always expects the law to be enforced if a criminal incident or crime occurs that is disturbing and causes disturbance to the community (Anton Susanto, 2020).

In general, all individuals agree that in living life, obeying the law is a must. Compliance with the law contributes to the creation of peace, order, and a sense of security in society. On the other hand, if the law is violated, chaos and disorder will arise which can disrupt social order (Jawade Hafidz, 2020), so that criminal law enforcement, including narcotics crimes, is a necessity. Law enforcement against narcotics crimes is a very important aspect in maintaining the security, health, and welfare of the community, so that with effective law enforcement, it is expected to prevent drug abuse, protect the community, and provide rehabilitation for users.

Law enforcement can be considered as one of the important benchmarks for the existence of a country that upholds legal principles or a state of law (Alvi Syahri, 2020), and law enforcement serves as an important measure in assessing the success of a state of law (Mulkan., 2022) (Sri Endah Wahyuningsih and Rismato, 2015), moreover, the Republic of Indonesia has declared itself as a country of law, which is explicitly stated in Article 1 paragraph (3) of the 1945 Constitution of the Republic of Indonesia, that: “The Republic of Indonesia is a country of law”, so that law enforcement is a key element in ensuring that the principles of a country of law are implemented effectively. The existence of fair, transparent and consistent law enforcement shows that a country of law is functioning well, providing legal certainty, protecting human rights and creating social justice.

Law enforcement is a process that aims to ensure that legal norms are implemented and function effectively as guidelines for community behavior and in the context of the state (Melisa Dewi Nur Aeni and Bambang Tri Bawono, 2020). Law enforcement activities aimed at enforcing the law have the aim of realizing justice, protecting human dignity and honor, and creating order, peace and legal certainty in accordance with applicable regulations (Meta Suryani and Anis Mashdurohatun, 2016).

As mentioned, drug crimes have a broad impact on individuals and society, thus requiring a consistent and effective law enforcement approach. Consistent law enforcement against drug crimes will provide a sense of security for the community. The community will feel protected from the dangers caused by the circulation and abuse of narcotics.

Criminal law enforcement aims to maintain order in society, protect human rights, and prevent criminal acts. The law enforcement process aims to realize the ideals stated in the laws and regulations into a reality that can be felt by society (Sekar Tresna Raras Tywi, 2021). In the context of narcotics crimes, when Law Number 35 of 2009 is implemented effectively, the community will feel safe from the threats posed by the circulation and abuse of narcotics. Good law enforcement can reduce the number of crimes related to narcotics, such as illicit trafficking, violence, and other crimes.

In the case of drug crimes, many users are actually victims of social injustice, and users need rehabilitation, not just punishment. This is different from drug dealers, who must receive severe punishment for destroying the nation's generation. Fair law enforcement must consider the humanitarian aspect, provide protection for drug users who want to recover and return to society, and be a deterrent for users and dealers.

Strict law enforcement on narcotics crimes will make perpetrators better understand the consequences of their actions, so that it is expected to reduce the number of narcotics abuse and distribution, in addition, law enforcement with a fair and humane approach can help overcome narcotics problems comprehensively, provide protection for the community, and encourage rehabilitation for users, thus law enforcement not only functions as a tool to uphold justice, but also as a means to ensure that legal norms can be effectively integrated into community interactions, thus creating a harmonious and sustainable order (Kristian, 2017).

Basically, criminal law enforcement consists of a series of actions carried out by law enforcement officers, such as the Police, Prosecutors, and Judges, with the aim of ensuring the effective and fair application of criminal law (Angel Nkhio, 2023). Judges are one of the law enforcement officers who play a very important role in the judicial system and law enforcement in a country, therefore judges have the authority to decide cases, judges not only act as interpreters of the law, but also as protectors of justice and human rights.

In narcotics crime cases, the Judge can impose a sentence in the form of imprisonment, rehabilitation, or criminal and other actions in accordance with applicable legal provisions. In imposing a decision, the Judge must understand the contents of the law well, including the purpose and intent of the provisions of the law. This is important so that the Judge can apply the law appropriately according to the context of the case at hand, so that in narcotics crime cases, the Judge must understand the provisions of Law Number 35 of 2009, including the types of violations and sanctions regulated.

When a Judge sentences a perpetrator of a narcotics crime, the Judge will give a verdict within the limits set out in Law Number 35 of 2009. In Law Number 35 of 2009, there are provisions regarding the minimum and maximum limits for criminal threats, which serve as a reference in the sentencing process by the Judge. With these guidelines, the Judge has the flexibility to determine the sentence at both the minimum and maximum limits according to the considerations of the case he is facing (Arief, 1998).

In practice, there is a phenomenon where judges issue decisions below the minimum threat as regulated in Law Number 35 of 2009. This phenomenon raises various questions regarding the consistency of law enforcement in the criminal justice system.

In addition, cases where judges issue criminal sentences that deviate from the minimum provisions in Law Number 35 of 2009, raise debates between two aspects, namely

justice and legal certainty. These two concepts are often the subject of discussion when faced with practice in the field. On the one hand, regulations must be enforced, while on the other hand, justice must remain a priority. The application of the law also needs to consider the characteristics of the case being handled, so that judges need to be wise in making decisions according to existing conditions, therefore many judges use their freedom in making decisions to provide decisions that are considered the fairest for the defendant (Zulkifli Rahman, 2024).

Law Number 35 of 2009 has explicitly regulates the minimum criminal threat for various types of narcotics crimes. For example, in Article 11 Law Number 35 of 2009 which regulates the possession of narcotics, by setting a criminal threat in the form of imprisonment of at least 4 years and a maximum of 12 years. Meanwhile, Article 12 Law Number 35 of 2009 regulates the circulation of narcotics, with the threat of heavier criminal penalties.

Oheo K. Haris, stated that the determination of minimum sentences in special criminal laws is a strategic step to prevent disparity in sentencing. In addition, it also serves to strengthen general prevention and emphasize the severity of the crime committed. In the context of minimum sanctions regulated in articles concerning special crimes, there are clear provisions regarding criminal sanctions, both maximum and minimum, so that no further interpretation is needed (Mardian Putra Frans, 2022). Although Law Number 35 of 2009 stipulates rules regarding minimum criminal penalties for various types of narcotics crimes, the imposition of criminal penalties in the context of this Law does not only focus on the application of repressive sanctions. On the contrary, the main objective of law enforcement in this Law is to provide a deterrent effect to violators and protect the community from the dangers caused by narcotics abuse.

The application of minimum criminal threats serves as an effort to emphasize the seriousness of the law against violations related to narcotics, but more than just providing punishment, Law Number 35 of 2009 aims to create a preventive effect that can reduce the number of narcotics crimes and encourage the community to stay away from detrimental behavior. In this case, the imposition of criminal penalties is expected to educate the community about the negative impacts of narcotics and the importance of maintaining the health and safety of individuals and the community, thus even though there are provisions regarding minimum criminal threats, the approach taken by Law Number 35 of 2009 emphasizes more on protecting the community and preventing narcotics abuse, thus creating a safer and healthier environment for all.

In relation to the practice, where there are cases where judges issue sentences below the minimum sentence that has been determined, some parties are of the opinion that issuing sentences below the minimum sentence can reduce the effectiveness of the law and create legal uncertainty, while others see it as a positive step towards a more humane and rehabilitation-oriented justice system.

Overall, the imposition of sentences below the minimum penalty by Judges in drug cases reflects the dynamics between strict application of the law and the need to consider the individual context of each case. This requires a balance between strict law enforcement and a more flexible approach that prioritizes justice and rehabilitation.

Sometimes the imposition of a verdict below the minimum penalty by the Judge can be done under certain conditions. This refers to the principle of restorative justice and humanitarian considerations. According to Prawira, the Judge can consider various factors, such as the defendant's condition, social background, and the possibility of rehabilitation. In this case, the imposition of a verdict below the minimum penalty does not mean ignoring the law, but rather the application of the law that is oriented towards justice (Prawira., 2020).

Various decisions by judges that impose sentences below the minimum limit can cause inconsistencies in the decisions. Sentencing in accordance with ideal norms should provide legal certainty and a sense of justice in society, although there are theories that support this practice. In addition, judges are often considered representatives of the law. Without consistency in deciding specific criminal cases, the rules contained in the law will not be able to provide a sense of justice and legal certainty in society. This can even create the impression that a new theory has emerged that justifies judges in creating new norms. Sudikno Mertokusumo explained that if the law does not cover something, then the judge is obliged to find the law through interpretation, exploration, and understanding of the legal values that live in society, thus, judges must be creative in carrying out their duties, in accordance with the principle that judges are considered to know the law (*ius curia novit*) (Romulus, 2016).

In the perspective of legal certainty and justice, the imposition of a Judge's decision under the minimum criminal threat in a narcotics crime case requires careful consideration. While legal certainty demands consistency and clarity in the application of the law, while justice demands fair and proportional treatment based on the individual's context, it is therefore important for the justice system to find the right balance between these

two principles, so that it can create justice that is not only based on law, but also on human values and rehabilitation.

Irfanul Hakim, a Judge at the Depok District Court in 2015, emphasized that in the process of sentencing, Judges must adhere to the laws and regulations, but on the other hand, Judges also have the freedom to determine sentences that are considered fair. The justice referred to here is subjective, referring to the consideration of the Judge's conscience and the perspective of the defendant. Determination of a sentence is not solely based on legal analysis, because this analysis only applies in the context of determining whether or not someone is guilty. After a defendant is found guilty, the imposition of a sentence will be carried out based on the consideration of the Judge's conscience in accordance with the justice he believes in. Furthermore, Irfanul Hakim quoted the opinion of Harifin A. Tumpa, former Chief Justice of the Republic of Indonesia for the 2009-2012 period, who stated that basically, Judges are obliged to implement the provisions contained in the law, including provisions regarding minimum sentences, but this principle is not rigid, a Judge does not only function as an implementer of the law, but must also consider the sense of justice that lives in society.

In the imposition of a verdict under the minimum criminal threat by the Judge in a narcotics crime case, as mentioned, there are two important perspectives that need to be considered, namely legal certainty and justice. These two aspects are often in tension, especially in a judicial system that seeks to uphold the law while still considering human values.

1. Legal certainty;

Legal certainty is a basic principle that requires everyone to clearly understand the legal consequences of their actions. In this context, the minimum criminal threat regulated in Law Number 35 of 2009 aims to set firm limits on sanctions for violators, but when the Judge decides to impose a sentence below the minimum criminal threat, this can raise doubts about the consistency and clarity of applicable law.

Legal certainty can be disrupted if the decision taken is not in line with the provisions that have been set, thus creating the impression that the application of the law is subjective. This situation can reduce public trust in the justice system, because individuals will feel that the law is not applied fairly and evenly, therefore it is very important for Judges to provide clear and transparent reasons when making decisions under the threat of minimum punishment, so that legal certainty is maintained.

2. Justice:

Justice is a principle that emphasizes the need for fair and proportional treatment of each individual, including in law enforcement. In cases of drug crimes, judges are often faced with situations where the perpetrators of the crime have different backgrounds. For example, a drug user who is trapped in addiction requires a rehabilitative approach rather than repressive punishment.

In this context, sentencing under the minimum penalty can be seen as an effort to achieve substantive justice, which takes into account the specific circumstances of each case. Judges have the freedom to assess mitigating factors, such as the offender's goodwill to improve themselves or the social impact of their actions, so that the decision can reflect an effort to achieve a balance between strict law enforcement and protection of human rights.

There are several factors that influence judges in imposing sentences below the minimum provisions specifically related to narcotics crime cases, namely:

1. Legal factors, which include Article 114 and Article 112 of Law Number 35 of 2009, where these articles do not provide clear limitations regarding the qualifications of prohibited acts, coupled with the existence of a Circular from the Supreme Court regarding the handling of narcotics cases;
2. Law enforcement factors, related to the indictment prepared by the Public Prosecutor, because Article 127 paragraph (1) of Law Number 35 of 2009 was not included in the indictment, considering that the preparation of the indictment is the responsibility of the Public Prosecutor, the absence of this Article in the indictment document is entirely a decision taken by the Public Prosecutor, as well as the authority and freedom of the Judge in assessing a case based on the characteristics of each case.

Both legal factors and law enforcement factors contribute significantly to the Judge's decision to impose a sentence below the minimum threat in narcotics cases. Overall, the Judge's decision is the result of a complex interaction between various factors that influence each other, therefore it is very important to understand the broader context behind each decision taken, in order to create a fairer and more effective justice system.

According to Chairul Huda, judges have an obligation to impose a sentence between the minimum and maximum criminal limits, however, judges can consider not applying the minimum sentence if it is considered too severe, thus in every decision, judges must produce a decision that reflects the sense of justice that is developing in society.

The imposition of a verdict below the minimum penalty by the Judge in a narcotics crime case is a practice that needs to be observed carefully. Although there is room to consider justice and humanity, the Judge must still adhere to the existing legal principles, therefore, it is important for the Judge to make careful considerations so that the decision taken not only meets the legal aspects, but also social justice.

4. Conclusion

The imposition of a judge's decision under the minimum criminal threat in enforcing the law on narcotics crimes based on the perspective of legal certainty and justice, shows that there is a complex dynamic between the two principles. Narcotics crimes are a serious issue that requires strict law enforcement, but must also consider the individual context of each case. Legal certainty demands consistency and clarity in the application of the law, which is reflected in the provisions of the minimum criminal threat regulated in Law Number 35 of 2009, but when the Judge issues a verdict below the minimum threat, this can raise doubts about the fairness and objective application of the law. This situation has the potential to reduce public trust in the justice system, because it can create the impression that the law is not applied evenly. On the other hand, justice emphasizes the need for fair and proportional treatment of each individual, especially in cases where the perpetrators of the crime have different backgrounds. The imposition of a verdict below the minimum criminal threat can be seen as a step towards achieving substantive justice, especially for drug users who need rehabilitation more than repressive punishment. Judges have the freedom to consider mitigating factors and the social context of each case, so that the decisions taken can reflect human values. It is very important for judges to make mature and transparent considerations in every decision, in order to create a balance between legal certainty and justice. A wise and justice-oriented approach is needed to ensure that the law is not only enforced firmly, but also provides protection and rehabilitation for the community. Thus, law enforcement can function as a means to create a more just and harmonious social order.

References

- [1] Syahri A. Law Enforcement against Policies Who Breached the Code of Conduct. *Journal of Sovereign Law*. 2020 Sep;3(3):313. Available from:

<http://journal.unissula.ac.id/index.php/RH/article/download/11238/4399>

- [2] Nikhio A, Amalia CS, Irawan Z. Law enforcement in Indonesia: The Role of the Government in Realizing It, in *Indigenous Knowledge*, Volume 2, Number 6, December 2023, p. 417, url: <https://jurnal.uns.ac.id/indigenous/article/download/79929/pdf>
- [3] Anton Susanto, Ira Alia Maerani and Maryanto, “Legal Enforcement by the Police against Child of Criminal Doer of a Traffic Accident Who Caused Death (Case Study in Traffic Accident of Police Traffic Unit of Cirebon City Police Jurisdiction)”, in the *Journal of Daulat Hukum*. Volume 3, Issue 1, March 2020, p. 23, url: <https://jurnal.unissula.ac.id/index.php/RH/article/view/8402>.
- [4] Hafidz J. “Cyberbullying, Social Media Ethics, and Its Legal Regulations”, in *Jurnal Cakrawala Informasi*, Vol. 1 No. 1. (2021), p. 26, url: <https://itbsemarang.ac.id/sijies/index.php/jci/article/view/147110>.
- [5] Frans MP. “Implementation of Sub-Minimum Criminal Sentences in Narcotics Cases Based on Progressive Law Perspective”, in *Supremacy Journal of Law*, Vol. 4, No. 2, 2022, p. 175, url: <https://jurnal.usahid.ac.id/index.php/hukum/article/view/652>
- [6] Melisa DN, Bawono BT. “The Death Penalty in the Perspective of Human Rights”, *Proceedings of the 4th Unissula Student Scientific Conference (KIMU)*, (October 28, 2020), p. 449, url: <https://jurnal.unissula.ac.id/index.php/kimuh/article/view/11643>
- [7] Suryani M, Mashdurohatun A. “Law Enforcement on the Existence of Public Motorized Rickshaws (Bentor) Based on Law Number 22 of 2009 concerning Traffic and Road Transportation”, in *Jurnal Pembaharuan Hukum*, Volume III No. 1. (January-April 2016), p. 26, url: <https://jurnal.unissula.ac.id/index.php/PH/article/view/1341>
- [8] Romulus, “Imposition of Criminal Sanctions Below the Special Minimum Limit in Law Number 35 of 2009 concerning Narcotics”, in the *Journal of PSMH Untan*, Vol. 12, No. 3, 2016, pp. 11-12, url: <https://jurnal.untan.ac.id/index.php/nesor/article/view/15964>
- [9] Sekar Tresna Raras Tywi, Ira Alia Maerani and Arpangi, “Law Enforcement against Entrepreneurs who Conduct Criminal Acts to Pay Wages Below the Minimum Wage”, in *Jurnal Daulat Hukum*, Volume 4 Issue 1, March 2021, p. 33, <https://jurnal.unissula.ac.id/index.php/RH/article/view/13882/5379>
- [10] Sri Endah Wahyuningsih and Rismato, “Criminal Law Enforcement Policy on Money Laundering Prevention in the Framework of Criminal Law Reform in Indonesia”, in *Jurnal Pembaharuan Hukum*, Vol. II No. 1. (January-April 2015), p. 47, url: <http://jurnal.unissula.ac.id/index.php/RH/article/view/4136/2887>
- [11] Rahman Z, Thalib H, Ilyas M. “Implementation of Special Minimum Provisions in Law Number 35 of 2009 concerning Narcotics”, in *Journal of Lex*

Philosophy (JLP), Vol. 5, No. 2, December 2024, p. 438, url: <https://pasca-umi.ac.id/index.php/jlp/article/view/1806/2105>

- [12] Prawira. *Hukum Pidana dan Penegakan Hukum Tindak Pidana Narko-tika*. Jakarta: Penerbit Universitas Indonesia; 2020.
- [13] Edi Setiadi dan Kristian. *Sistem Peradilan Pidana Terpadu dan Sistem Pe-negakan Hukum Di Indonesia*. Jakarta: Kencana Prenada Media Group; 2017.
- [14] Hasanul Mulkan. *Buku Ajar Hukum Tindak Pidana Khusus*. Cetakan Pertama. Palembang: Noer Fikri Offset; 2022.
- [15] Lefri Mikhael, dkk. *Hukum Pidana Diluar Kodifikasi*. Cetakan Pertama. Padang: Global Eksekutif Teknologi; 2023.
- [16] Moh. Taufik Makarao, Suhasril, dan H. Moh Zakky A.S. *Tindak Pidana Narkotika*. Jakarta: Ghalia Indonesia; 2003.
- [17] Muladi dan Barda Nawawi Arief. *Teori-Teori dan Kebijakan Pidana*. Bandung: Alumni Press; 1998.
- [18] Wiwik Sri Widiarty. *Buku Ajar Metode Penelitian Hukum*. Cetakan Pertama. Yogyakarta: Publika Global Media; 2024.
- [19] Yasmirah Mandasari Saragih, Alwan Hadiyanto, dan Mas Subagyo Eko Prasetyo, *Pengantar Hukum Pidana Transisi Hukum Pidana Di Indonesia*. Cetakan pertama. Medan: Tungga Esti; 2022.
- [20] Yopie Morya Immanuel Patiro. *Diskresi Pejabat Publik dan Tindak Pidana Korupsi*. Cetakan Pertama. Bandung: Keni Media; 2012.