

INVESTIGATION OBSTACLES (OBSTRUCTION OF JUSTICE IN THE CRIME OF THE PLANNED KILLING OF BRIGADIR NOFRIANSYAH YOSUA HUTABARAT IN LEGAL CRIMINOLOGY PERSPECTIVE)

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Abstract

Obstruction of justice carried out by the police group is an example that in practice anyone who violates the law must be punished. This research will examine this matter from a criminological point of view and discuss the sociological, psychological and biological impacts of the perpetrators of obstruction of justice as well as the role of society viewed through the crime side of the disappearance of evidence. This study uses a normative juridical research method. The results showed that this case was categorized as premeditated murder, which according to Sigmund Freud's psychoanalytic theory, psychologically, Ferdy Sambo committed the act of this crime of murder was due to a stimulus from Brigadier Yosua as the victim, while Ferdy Sambo's subordinates or subordinates committed this crime of murder because there were environmental factors (police agencies) that provided an opportunity to cause a crime. Criminology has a relationship with and is closely related to criminal law, especially when discussing Obstruction of Justice, so in this case it will discuss the existence of criminal etiology which seeks to explain that criminology is a tool for carrying out an effective arrangement and control of a legal sanction against criminal law which has the aim is to give fear to those who have the intention to commit a crime or a violation of criminal law. In this case, the police must be able to show that the police institution is at the forefront in handling all cases of criminal acts indiscriminately and prove this to the public.

1. INTRODUCTION

Indonesia is a unitary state in the form of a republic and puts forward the concept of a rule of law.¹ The rule of law is built by developing the legal instruments themselves as a functional and just system, developed by organizing the superstructure and infrastructure of political, economic, and social institutions in an orderly manner, and fostered by building

¹ Azhady, *Negara Hukum Indonesia* (Jakarta: Universitas Indonesia Press, 1995), 3.

a rational and impersonal legal culture and awareness in life society, nation, and state. Therefore, in a legal system, it is necessary to build (law making) and enforce (law enforcing) accordingly, starting with the constitution as the law with the highest position.² The law contains what must be done and which cannot be done which is coercive, binding and contains strict sanctions. One of the applicable laws in Indonesia is criminal law. Talking about criminal law, the implementation of criminal law is inseparable from the science of criminology. In fact, criminology is needed in criminal law to define the scope of a crime or punishable behavior. Both criminology and criminal law are closely related because the results of criminological analysis provide many benefits within the framework of the investigative process of the occurrence of an individual crime. Criminology looks for a reason, or a factor that encourages the emergence of crimes that give rise to legal consequences.

Criminal law focuses on proving a crime, while criminology focuses on the factors that cause crime. Criminology is aimed at revealing the motives of the perpetrators of crimes while criminal law is aimed at the relationship between actions and their consequences (the law of causality). Criminology studies crime from a social perspective. Criminology is referred to as a science that studies humans in conflict with certain social norms. Criminology seeks to gain knowledge and understanding of social phenomena in the field of crime that occurs in society, in other words, the reason why the perpetrator commits the crime. In order to maintain and supervise the law in an effective manner, a judiciary has been formed which functions to adjudicate each issue/case with the aim of producing a decision that can provide justice to the parties to the case. However, in the implementation of court trials, acts that often obstruct and obstruct the criminal justice process, known as obstruction of justice, often occur. Obstruction of justice is an action that is shown or has the effect of turning the legal process upside down, as well as disrupting the proper function of a judicial process. Obstruction of justice is considered a form of criminal action because it hinders law enforcement and damages the image of law enforcement agencies.³

As happened in the obstruction of justice case related to the premeditated murder of Nofriansyah Yosua Hutabarat by Former Head of the Profession and Security Division of the National Police, Ferdy Sambo.⁴ In this case, Ferdy Sambo and six of his men, namely Hendra Kurniawan, Agus Nurpatia, Arif Rahman Arifin, Chuck Putranto, Baiquni Wibowo, and Irfan Widyanto were involved in obstruction of justice. Each of them had their own roles in helping Ferdy Sambo to carry out the planning action of the murder, each of which can be described as follows:⁵

1. It is known that Ferdy Sambo had the intention of covering up the facts of the case by trying to obscure the crime by creating a scenario to prevent this case from entering the criminal realm and only stopping at the Internal Security of National Police (*Pengamanan Internal di Lingkungan Kepolisian Negara Republik Indonesia /Paminal Polri*). Ferdy Sambo attempted to obstruct and hinder the authorities from

² Adam Chazawi, *Kejahatan Terhadap Tubuh dan Nyawa* (Jakarta: Raja Grafindo Persada, 2002), 72.

³ Andi Sofyan and Abdul Asis, *Hukum Acara Pidana Suatu Pengantar* (Yogyakarta: Rangkang Education, 2013), 51.

⁴ Lamintang, *Dasar-Dasar Hukum Pidana Indonesia* (Bandung: Sinar Baru, 1984), 69.

⁵ Eko Ari Wibowo, "Ada 6 Orang di TKP Penembakan Brigadir J: Baru Ferdy Sambo dan 3 Orang Jadi Tersangka," *Tempo*, August 11, 2023, <https://nasional.tempo.co/read/1621521/ada-6-orang-di-tkp-penembakan-brigadir-j-baru-ferdy-sambo-dan-3-orang-jadi-tersangka>.

investigating the case by prohibiting the Magelang incident from being followed up.

2. Hendra Kurniawan's role was to order his subordinates in the police to check and delete the CCTV footage around the TKP. Hendra also ordered his men (Arif Rachman) to ask South Jakarta Police investigators to make a report on fictitious harassment of Ferdy Sambo's wife, Putri Candrawati.
3. Agus Nurpatria played the role of asking Irfan Widyanto to secure CCTV without a valid warrant.
4. Chuck Putranto played the role of controlling two vital CCTV decoders (DVR) around the TKP. Chuck Putranto took control of the DVR without being accompanied by an assignment letter or minutes of confiscation as stipulated by the Criminal Procedure Code.
5. Baiquni plays a role in accessing the CCTV DVR which is evidence for the murder of Brigadier Yosua at Ferdy Sambo's official residence.
6. Arif Rachman played the role of asking South Jakarta Police investigators to guard the minutes of examination (BAP) of Putri Candrawati regarding the alleged fictitious harassment under the pretext of disgrace. In addition, Arif Rachman also deliberately broke a laptop containing CCTV recording files, which resulted in the electronic system not working properly or no longer being able to function.
7. Irfan Widyanto acted as an extension of Sambo to take the CCTV DVR around his official residence.

For the act of obstructing the investigation that was carried out, all of them were charged under Article 49 jo. Article 33 of Law Number 19 of 2016 on Amendments to Law Number 11 of 2008 on Information and Electronic Transactions in conjunction with Article 55 paragraph (1) 1st of the Criminal Code.⁶ With the fulfillment of these criminal elements, a cause-and-effect relationship in criminology can be sought, namely by seeking answers to the question "why did the perpetrator commit the crime". Ferdy Sambo fabricated the motives in such a way and events of the crime of killing Brigadier Yosua as if it were an event that could be classified as *noodweer excess*. In touch with the perpetrator's motives, Criminology is here to reveal the true motives of the perpetrators. Criminology views a person's motives in committing a crime in terms of two factors, namely internal factors and external factors. Internal factors are believed to be the result of a person's bad personality and finally commit a crime. Meanwhile, external factors come from outside the actor, namely the environment. This study uses two problem formulations, namely what are the sociological, psychological and biological impacts of obstruction of justice actors in the premeditated murder case of brigadier Nofriansyah Yosua Hutabarat; and what is the response from the community, seen from the side of crime, for the disappearance of evidence (obstruction of justice) committed by members of the Police.

2. METHOD

This study uses normative legal research because this research is only aimed at written regulations so this research is very closely related to literature because it will require secondary data.⁷ This study uses secondary data. Secondary data in legal research can be classified into 3 (three) levels, namely Primary Legal Materials, Secondary Legal Materials,

⁶ Abdul Kadir Muhammad, *Hukum dan Penelitian Hukum* (Bandung: Citra Aditya Bakti, 2004), 31.

⁷ Peter Mahmud, *Penelitian Hukum* (Jakarta: Prenada Media Group, 2005), 25.

and Tertiary Legal Materials. The data collection method uses library research (library research), namely conducting a series of documentation studies by collecting, reading, studying, making notes, and citations and reviewing library materials from books, accredited journals, websites, laws and regulations, and other documents related to the research topic. The types of approaches used are statutory approaches, case approaches, and legal criminology approaches. The type of data analysis used by the author in this study is qualitative data.

3. RESULTS AND DISCUSSION

3.1 Analysis of the Psychological, Sociological, and Biological Impacts of Obstruction of Justice Actors in the Murder Case of Brigadier Nofriansyah Yosua Hutabarat

Criminal behavior is a category of behavior that socially, culturally, politically and economically deviates from existing laws.⁸ One form of criminal behavior is the crime of murder. For this reason, the criminal act of murder as a social phenomenon is influenced by various aspects of life in society such as politics, economics, socio-culture and matters related to the efforts of state defense and security. The theory states that the factors that have a big influence in creating crime are environmental factors. This theory is known as an environmental school which has the motto "*Die welt ist shuld an mir als ich*" (The world is more responsible for me than myself). This theory argues that a person commits a crime caused by:⁹

- a. An environment that provides an opportunity to generate crime;
- b. The social environment that provides good examples or bad examples;
- c. Economic environment (poverty, unemployment, etc.);
- d. Different social environment.

Previously it was known that in this case, Richard Eliezer Pudihang Lumiu which was Ferdy Sambo's subordinate, received an order from the defendant Ferdy Sambo to kill the victim Novriansyah Yosua Hutabarat by shooting him as planned. Ferdy Sambo then approached the victim, Nofriansyah Yosua Hutabarat, who was lying down and seriously injured by the gunshots, but was still alive and feeling sick. After making sure that the victim died calmly, Ferdy Sambo used black gloves and held a firearm to fire one shot at the victim's head, so the victim died at the scene. However, after the victim was shot by Ferdy Sambo, the defendant felt pressured and had the intention to hide the facts that had occurred during the incident. Ferdy Sambo's goal is to obscure evidence that can prove the crimes he has committed, such as removing items involved in a crime. For example, Ferdy Sambo tried to destroy evidence by contacting the witness Hendra Kurniawan. In the indictment of the Obstruction of Justice case with case number PDM-124/JKTSL/10/2022, the Defendant Hendra Kurniawan was charged as the party who ordered his men to replace the DVR surveillance camera (CCTV) which recorded all the events around the complex where Ferdy Sambo lived in the Complex Duren Tiga Police, South Jakarta.

The defendant was known to find out that one of the CCTV cameras showed that Brigadier Nofriansyah Yosua Hutabarat was still alive after Ferdy Sambo arrived at his official residence, which was different from Ferdy Sambo's previous story. This information was obtained through information from his staff, Arif Rachman Arifin, who had seen the

⁸ Mustofa, *Kriminologi: Kajian Sosiologi Terhadap Kriminalitas, Perilaku Menyimpang dan Pelanggaran Hukum* (Bekasi: Sari Ilmu Pratama, 2010), 37.

⁹ Duwi Handoko, "Klasifikasi Dekriminalisasi Dalam Penegakan Hukum di Indonesia," *Jurnal Hak Asasi Manusia* 10, no. 2 (2019): 51, <https://ejournal.balitbangham.go.id/index.php/ham/article/view/622>.

CCTV footage at the time. In a meeting between the three of them, Ferdy Sambo ordered Arif Rahman Arifin to delete and destroy the recording files. The defendant Hendra Kurniawan was asked to ensure that Arif Rahman Arifin's duties were properly carried out. Apart from Arif Rahman Arifin, Hendra Kurniawan then also ordered four others. The four people are Agus Nurpatia, Chuck Putranto, Baiquni Wibowo. For their actions, they were charged with Article 49 in conjunction with Article 33 and Article 48 in conjunction with Article 32 paragraph (1) of Law Number 19 of 2016 on Amendments to Law Number 11 of 2008 on Information and Electronic Transactions¹⁰ in conjunction with Article 55 paragraph 1 1st of the Criminal Code and Article 233 of the Criminal Code and Article 221 paragraph 1 2nd *juncto* Article 55 paragraph 1 to 1 of the Criminal Code.

Looking at it from a psychological perspective, Ferdy Sambo actually realized that the power he possessed could smooth out his evil plans, namely that he could manipulate the murder case he committed against Brigadier J or Nofriansyah Yoshua Hutabarat. This is included in the psychology of abuse of power, which is the study of the tendency of individuals or groups to abuse the power or authority they have to manipulate or harm others for personal gain. This term refers to a behavior that harms or causes harm to others by people with higher power or influence.¹¹ The psychology of abuse of power includes various forms of behavior such as intimidation, humiliation, discrimination, abuse of trust, physical or sexual abuse, and bullying.¹² Research in the field of psychology of abuse of power often involves analyzing the motivations and behaviors of individuals who abuse power, as well as the factors that influence and prevent such behavior. Therefore, there was no concern for Ferdy Sambo when he executed his own adjutant, namely Brigadier J at the official residence in Duren Tiga and even mobilized other units including the expert staff of the National Police Chief. So, under the psychology of his great power, Ferdy Sambo is not only capable of committing murders, but also performs an obstruction of justice or obstruction of investigations including bringing the influence of that power to order his six subordinates who took part in the obstruction of justice.¹³

In addition, the Writing Team also believes that the actions taken by Bharada E as the executor of the shooting of Brigadier Yosua and the investigators as the perpetrators of obstruction of justice which hindered the truth of this case, such as by destroying evidence, can be said to be carelessness. Carelessness itself can be interpreted as negligence and/or mistakes in action. Their actions can then be called as a carelessness because both Bharada E and the investigators who are currently the perpetrators of the obstruction of justice have been negligent in acting as law enforcement officials, but they have no power, in which they have to carry out orders from their superiors without asking further questions. Regarding the order, or they must act to find the correct evidence and present the evidence at trial. Furthermore, when viewed from a sociological perspective, it can be understood that the loss of evidence in murder cases can be explained through social factors such as pressure and criminal culture.¹⁴ Pressure in this case can be interpreted as pressure from Ferdy Sambo, who is the boss and also the environment of the police institution, can never be

¹⁰ Topo Santoso and Eva Achjani Zulfa, *Kriminologi* (Jakarta: Rajawali, 2012), 43.

¹¹ Mokhammad Najih, *Politik Hukum Pidana* (Malang: Setara Presss, 2014), 95.

¹² Sahad Maruli T. Situmeang, *Buku Ajaran Kriminologi* (Depok: Rajawali Buana Pustaka, 2021), 125.

¹³ Didik Endro Purwoleksono, "Tinjauan Kriminologi Terhadap Penyalahguna Narkotika," Research paper delivered at National Seminar "Dekriminalisasi Penyalahguna Narkotika (Reorientasi Kebijakan Pemidanaan Bagi Penyalahguna Narkotika)," Malang, 2014.

¹⁴ Teguh Prasetyo, "Kebijakan Kriminalisasi Dalam Peraturan Daerah dan Sinkronisasi dengan Hukum Pidana Kodifikasi," *Jurnal Hukum* 16, no. 1 (2009): 18–33, <https://doi.org/10.20885/iustum.vol16.iss1.art2>.

separated from his name, position and rank, as well as the name of the order of his superiors. It is undeniable that the accused perpetrators of obstruction of justice have various ranks, but none of them is higher than the rank of Ferdy Sambo. Given that the environment is the biggest factor that can influence a person to commit a crime or an act that is contrary to applicable norms or rules, external factors that influence the occurrence of a crime,¹⁵ in this case the murder of Brigadier Yosua, are factors that come from work or social factors, which in this case is a police agency. This was a factor that influenced the occurrence of the crime, of course, because for the sake of path and security for superiors, the accused killers of Brigadier Yosua followed orders. This was never separated from the existing obstacle process in which everyone who was named as Obstruction of Justice had their respective roles in carrying out the crime of premeditated murder against Brigadier Yosua. Therefore, perpetrators may experience pressure from their social environment to engage in criminal activity, or they may be raised in an environment that condones crime. In addition, the criminal culture that develops in certain social groups can influence individual views and behavior, including in terms of destroying evidence.¹⁶

Thus, if it is associated with the whereabouts of the Defendant, Obstruction of Justice, the murder case of Brigadier Yosua, in this case, provides an affirmation that criminology is used as a tool to see the existence of an objective reality. This approach is used to identify and also see consensus on actions that cause crime. As criminology in this case from a psychological and sociological perspective that can see and identify the premeditated murder of Brigadier Yosua.¹⁷

3.2 Society's Response Viewed Through the Crime Side of the Disappearance of Evidence (Obstruction of Justice) Committed by Police Personnel

The concept of the sociology of law in criminological studies is to discuss what sanctions or punishments are appropriate for the perpetrators of Obstruction of Justice to account for in the case of the murder of Brigadier Yosua. The relevance of criminology and other legal studies is urgently needed to establish a criminal responsibility mechanism that can be imposed by the Obstruction of Justice perpetrators in the premeditated murder of Brigadier Yosua. The crimes committed by all parties, in this case the police officers, need to be made as an important record for the police institution to organize and improve its institutional governance.¹⁸ This certainly has an impact and an adverse effect on the public's view that the police do not have the capability to resolve and deal with the murder of Brigadier Yosua. Not only that, the public view that has given a bad response to the performance of the police gives a consequence to the police to prove that it is only individuals who have committed ethical violations, especially in terms of obstruction of justice committed by a number of police officers.¹⁹

¹⁵ *Ibid.*

¹⁶ M. Yahya Harahap, *Pembahasan Permasalahan dan Penerapan KUHAP: Pemeriksaan Sidang Pengadilan, Banding, Kasasi, dan Peninjauan Kembali Edisi Kedua* (Jakarta: Sinar Grafika, 2006), 81.

¹⁷ Muhammad Khadafi, "Tinjauan Kriminologi Pelanggaran Hak Asasi Manusia yang Diduga Dilakukan Oleh Oknum Kepolisian Pada Proses Penyelidikan" (thesis, Universitas Muhammadiyah Sumatera Utara Medan, 2021), UMSU Repository, <http://repository.umsu.ac.id/handle/123456789/18247>, 98.

¹⁸ Moeljatno, *Asas-Asas Hukum Pidana* (Jakarta: Rineka Cipta, 2009), 32.

¹⁹ Munir Fuady, *Teori Hukum Pembuktian: Pidana dan Perdata* (Bandung: Citra Aditya, 2006).

The police institution in this case must be able to become an example and a pillar of law enforcement in implementing and fulfilling the security needs of society.²⁰ When there are parties who commit obstruction of justice in handling this murder case, it is necessary to ensure that the name of the police becomes bad. In cases of obstruction of justice, the police institution must be morally responsible to the public to prove that the implementation of law enforcement can proceed according to the applicable procedures. This can be used as a shield to prove to the public that until now the police institution can be proven integrity and can also be trusted in overcoming and being responsible for solving the problem of the murder of Brigadier Yosua.

4. CONCLUSION

In conclusion, this case is categorized as premeditated murder, which according to Sigmund Freud's psychoanalytic theory, can be triggered by the Tonatos instinct possessed by humans. Psychologically, Ferdy Sambo and his subordinates can be categorized as killing because of personal factors that are driven by aggressiveness (self-defense) and his subordinates are negligent in being law enforcement officials on the grounds that they have no power between having to carry out orders from superiors or looking for correct evidence. Sociologically, Ferdy Sambo committed this crime of murder because of a stimulus from Brigadier Yosua as the victim, while Ferdy Sambo's subordinates or subordinates committed this crime of murder because there were environmental factors (police agencies) that provided an opportunity to cause crime. As well as, biologically, Ferdy Sambo can be classified as a criminal of passion, while Bharada E and the six obstruction of justice actors can be classified as an insane criminal. Criminology has a relationship and is closely related to criminal law, especially when discussing Obstruction of Justice, in this case it will discuss the existence of criminal etiology which seeks to explain that criminology is a tool for carrying out an effective arrangement and control of a legal sanction against criminal law which has the aim to give fear to those who have the intention to commit a crime or a violation of criminal law. The concept of criminal etiology in this case will assist the Public Prosecutor and the Judge in determining what sanctions are then appropriate to be imposed on the perpetrators of Obstruction of Justice. At the beginning of this case the level of public trust in the police was low because the perpetrators themselves were all police officers, because the police are also trusted by the community as the front guard to solve problems like that. This police institution, especially when there is an Obstruction of Justice case, must be able to show that the police institution is at the forefront in handling all criminal cases without discrimination and proves to the public that the police institution is still at the forefront in enforcing the law and trust in society.

REFERENCES

Books:

Azhady. *Negara Hukum Indonesia*. Jakarta: Universitas Indonesia Press, 1995.

²⁰ Info Hukum, "Keterkaitan Kriminologi Dengan Hukum Pidana," last modified February 28, 2017, <https://info-hukum.com/2017/02/28/perbedaan-persamaan-dan-keterkaitan-kriminologi-dengan-hukum-pidana/>.

- Chazawi, Adami. *Kejahatan Terhadap Tubuh dan Nyawa*. Jakarta: Raja Grafindo Persada, 2002.
- Fuady, Munir. *Teori Hukum Pembuktian: Pidana dan Perdata*. Bandung: Citra Aditya, 2006.
- Harahap, M. Yahya. *Pembahasan Permasalahan dan Penerapan KUHAP: Pemeriksaan Sidang Pengadilan, Banding, Kasasi, dan Peninjauan Kembali*. Jakarta: Sinar Grafika, 2006.
- Lamintang. *Dasar-Dasar Hukum Pidana Indonesia*. Bandung: Sinar Baru, 1984.
- Mahmud, Peter. *Penelitian Hukum*. Jakarta: Prenada Media Group, 2005.
- Moeljatno. *Asas-Asas Hukum Pidana*. Jakarta: Rineka Cipta, 2009.
- Muhammad, Abdul Kadir. *Hukum dan Penelitian Hukum*. Bandung: Citra Aditya Bakti, 2004.
- Mustofa. *Kriminologi: Kajian Sosiologi Terhadap Kriminalitas, Perilaku Menyimpang, dan Pelanggaran Hukum*. Bekasi: Sari Ilmu Pratama, 2010.
- Najih, Mokhammad. *Politik Hukum Pidana*. Malang: Setara Press, 2014.
- Santoso, Topo, and Eva Achjani Zulfa. *Kriminologi*. Jakarta: PT Raja Grafindo Persada, 2001.
- Situmeang, Sahat Maruli T. *Buku Ajaran Kriminologi*. Depok: PT Rajawali Buana Pustaka, 2021.
- Sofyan, Andi, and Abdul Asis. *Hukum Acara Pidana Suatu Pengantar*. Yogyakarta: Rangkang Education, 2013.

Journal Articles:

- Handoko, Duwi. "Klasifikasi Dekriminalisasi Dalam Penegakan Hukum di Indonesia." *Jurnal Hak Asasi Manusia* 10, no. 2 (2019). <https://ejournal.balitbangham.go.id/index.php/ham/article/view/622>.
- Prasetyo, Teguh. "Kebijakan Kriminalisasi Dalam Peraturan Daerah dan Sinkronisasi dengan Hukum Pidana Kodifikasi." *Jurnal Hukum* 16, no. 1 (2009): 18–33. <https://doi.org/10.20885/iustum.vol16.iss1.art2>.

Thesis:

- Khadafi, Muhammad. "Tinjauan Kriminologi Pelanggaran Hak Asasi Manusia yang Diduga Dilakukan Oleh Oknum Kepolisian Pada Proses Penyelidikan." Thesis, Universitas Muhammadiyah Sumatera Utara Medan, 2021. UMSU Repository. <http://repository.umsu.ac.id/handle/123456789/18247>.

Scientific Papers:

- Purwoleksono, Didik Endro. "Tinjauan Kriminologi Terhadap Penyalahgunaan Narkotika." Research paper delivered at National Seminar "Dekriminalisasi Penyalahgunaan

Narkotika (Reorientasi Kebijakan Pemidanaan Bagi Penyalahguna Narkotika)". Malang, 2014.

Internet:

Wibowo, Eko Ari. "Ada 6 Orang di TKP Penembakan Brigadir J: Baru Ferdy Sambo dan 3 Orang Jadi Tersangka." *Tempo*, August 11, 2023. <https://nasional.tempo.co/read/1621521/ada-6-orang-di-tkp-penembakan-brigadir-j-baru-ferdy-sambo-dan-3-orang-jadi-tersangka>.

Info Hukum. "Keterkaitan Kriminologi Dengan Hukum Pidana." Last modified February 28, 2017. <https://info-hukum.com/2017/02/28/perbedaan-persamaan-dan-keterkaitan-kriminologi-dengan-hukum-pidana/>.