

Juridical Review of the Criminal Act of Car Theft by Rental Car Mode According to the Criminal Law (KUHP)

Horas Sahatma Hatuaon¹, Soerya Respationo², Erniyanti Erniyanti³

¹⁻³Postgraduate Master of Law, University of Batam, Batam City, Indonesia

ARTICLE INFO

Article history:

Received: 25 June 2024;

Revised: 06 July 2024;

Accepted: 02 August 2024;

Published: 06 August 2024

Keywords:

Theft, Embezzlement, Mode, CarRental.

ABSTRACT

Transportation is very important for our daily lives when we want to travel. Rental cars are one of the current solutions when we don't have a vehicle. However, the convenience provided by car rental is often misused by irresponsible parties. Starting from damaged returns, theft and embezzlement. The research carried out by researchers is Empirical Juridical legal research which is research that directly obtains data in the field. By doing research in the field, researchers will understand better and be able to find out more clearly the actual events related to the title of the research being studied. From the results of this research, the author can conclude that one of the modus operandi of embezzlement in the jurisdiction of the Riau Islands Regional Police is the crime of embezzlement and/or fraud and/or malicious assistance. This way the car is rented and then pawned to someone else without the knowledge of the original owner of the car. For this reason, the police have two efforts to overcome this, namely by preventive and repressive methods. The police's obstacles in uncovering cases are two factors, namely internal and external factors. The suggestions put forward in this research are the need to increase the budget in the context of investigating and investigating criminal acts of embezzlement of rental cars, providing education to car rental businesses to install GPS to increase car security and providing more telescopic services for rental cars.

1. INTRODUCTION

Population growth in Indonesia, especially in Batam City, based on the Central Statistics Agency (BPS) of Batam City, recorded a population growth projection in Batam in 2020 of 1,196,396 people¹. This causes an increase in needs, both qualitatively and quantitatively. The increase in population will certainly increase community activities, these activities will affect their environment, such as the means of transportation used to support activities and shorten the time to reach their destination. The needs and interests of modern society today are very diverse, basic needs are not only in the form of clothing, shelter and food as before. Technological advances and developments from time to time have made the needs and interests of society increase. To support activities and shorten time, transportation has now become a basic need for modern society because without transportation humans can be isolated and cannot make a movement. Deviant behavior is a real threat or threat to social norms that underlie social order, can cause individual tensions or social tensions, and is a real or potential threat to the continuation of social order. Thus, crime, besides being a humanitarian problem, is also a social problem.

Embezzlement is regulated in Book II, Title XXIV, Articles 372-377 of the Criminal Code. Article 372 contains the definition of embezzlement, Article 373 provides an understanding of the types of embezzlement, while Article 374 and Article 375 regulate embezzlement in aggravated forms, and Article 376 regulates embezzlement within the family environment. In the provisions of Article 372 of the Criminal Code. Embezzlement is the act of claiming to be the owner of an item that is partly or wholly owned by another person, where the possession of the item is not due to a crime. The emergence of criminal acts committed by renters against rental cars is a form of abuse of rights or abuse of trust where the renter understands that his actions violate the law which has the threat of punishment according to the provisions of Article 372 which reads: "Anyone who intentionally and unlawfully claims as his own property an item that is wholly or partly owned by another person but which is in his control not because of a crime that is threatened because of embezzlement with a maximum sentence of four years or a maximum fine of nine hundred rupiah".

In this case, the function of the Police as one of the functions of the state government in the field of maintaining public security and order, law enforcement, protection, guardianship and service to the community is realized through police efforts in overcoming the crime of embezzlement of rental cars to provide a sense of security for rental car owners to run their businesses freely without worrying about the security of their vehicles. Although they have been threatened with a long prison sentence, it turns out that there are still those who dare to embezzle rental cars. This is what prompted the author to find out how the police are trying to combat the crime of embezzlement of rental cars to prevent more cases of embezzlement of rental cars and to protect the interests of the community as the party that needs rental services the most.

Based on the background description above, the author raises several problems that will be discussed further. The problems are as follows:

1. How are the legal regulations and the role of investigators in enforcing the crime of embezzlement of rental cars?
2. What is the modus operandi of the crime of embezzlement of rental cars in the jurisdiction of the Riau Islands Police?
3. What are the efforts and obstacles of investigators in carrying out their duties in eradicating the crime of embezzlement of cars?

Based on the formulation of the problem stated above, it can be seen that the objectives of this research are:

1. Analyze the role of investigators in enforcing the crime of embezzlement of rental cars in the jurisdiction of the Riau Islands Police.
2. To find out and understand the modus operandi of embezzlement of rental cars in the jurisdiction of the Riau Islands Police.
3. To find out and understand the efforts and obstacles of the Police in carrying out their duties to eradicate the crime of embezzlement of rental cars.

2. LITERATURE REVIEW

Investigation is the first step in resolving a criminal case and serves to determine whether there is a crime in the incident. When a crime is known, an investigation can begin. In an investigation, the focus is on "finding and finding" an "event" that is considered or suspected to be a crime, while in an investigation, the focus is on "finding and collecting evidence". The purpose of an investigation is to uncover the crime that has been discovered and find the perpetrator. The definition of an investigation is stated in Article 1 point 2 of the Criminal Procedure Code, namely in Chapter I concerning the General Explanation, namely: "Investigation is a series of actions by investigators in terms of and according to the methods regulated in this law to search for and collect evidence with which the evidence sheds light on the crime that has occurred and in order to find the suspect.

Investigators conduct examinations concentrated on legal issues. The suspect is the starting point of the examination in front of the investigator. He is the source of information about the criminal event being examined. However, the principle of accusature must be applied to the suspect who is the starting point of the examination. The suspect must be placed in a valuable human position. He must be evaluated as a subject rather than an object. What is examined is not the suspected individual. The object of the examination is the crime he committed. The focus of the examination is the mistake made by the suspect. Until a valid court decision, the suspect is considered innocent based on the legal principle of "presumption of innocence".

The police function as protectors of society in all kinds of social conditions and have an important role in ensuring security and comfort in community life. The role of the police can be described as part of their position as protectors of society. According to Law Number 2 of 2002 concerning the Indonesian National Police, the definition of the police is everything related to the functions and institutions of the police in accordance with laws and regulations.

The police function as an organization and function of government, with the responsibility to supervise and force the authorities not to take actions prohibited by law.

According to Moeljatno, criminal law is part of the entire law in force in a country, which provides the basis and rules for:

1. Determining which acts may not be carried out, which are prohibited, accompanied by threats or sanctions in the form of certain criminal penalties for anyone who violates the prohibition
2. Determining when and in what cases those who have violated the prohibitions can be subject to or sentenced to the criminal penalties as threatened
3. Determining how the imposition of criminal penalties is carried out if someone is suspected of having violated them. According to Simons, criminal law is divided into criminal law in the objective sense (positive law / *ius poenale*) and criminal law in the subjective sense (*ius puniendi*). "Criminal law in the objective sense is the totality of the prohibitions and obligations for violations by the state

Mezger said that criminal law can be defined as a legal rule, which binds to an act that meets certain conditions a consequence in the form of a crime. By an act that meets certain conditions, it is meant an act committed by a person, which allows for the imposition of a criminal penalty. Such an act can be called an act that can be punished or abbreviated as a crime (*Verbrechen* or Crime). Because in this crime there must be a person who does it, the issue of certain acts is detailed into two, namely the prohibited act and the person who violates the prohibition. In the Criminal Code, "Anyone who intentionally and unlawfully owns something which is wholly or partly owned by another person, but which is in his control not because of a crime, is threatened with embezzlement, with a maximum prison sentence of four years or a maximum fine of nine hundred rupiah."

According to Cleiren, the core of the crime of embezzlement is the abuse of trust. It always involves unlawfully possessing an item entrusted to the person who embezzles it. The classic boundary between theft and embezzlement is that in theft "takes" (*wegnemen*) an item that is not yet in his possession, while in embezzlement the item is already in his control. The crime of embezzlement is a crime by doing (*gedragsdelicten*) or a crime of domicile. The time and place of the embezzlement is the time and place of the implementation of the will that is already clear. So for example, goods that are already in his hands not because of a crime, are sold or donated, then the time and place of the sale or donation are the *tempus* and *locus delicti*.

Embezzlement committed by a person who is forced to be given an object to be kept or committed by a guardian, custodian, attorney or executor of a will, administrator of a social institution or foundation, against an object which he controls as such, is punishable by a maximum prison sentence of 6 years. In crimes against property, theft, threats, extortion, embezzlement, fraud if committed within the family, it can become:

1. No prosecution can be carried out against either the perpetrator or the person who helped to do it (Article 367 paragraph 1 of the Criminal Code)
2. Criminal complaint. Without a complaint, neither the perpetrator nor the person who helped to do it can be prosecuted (Article 367 paragraph 2 of the Criminal Code)

3. RESEARCH METHOD

The research in writing this thesis proposal is descriptive in nature, namely describing the symptoms in the community environment regarding a case being researched. The approach used is a qualitative approach which is a research procedure that produces descriptive data. The qualitative approach used by the author aims to understand or comprehend the symptoms being studied. The author conducted the research with the aim of drawing legal principles ("rechtsbeginselen") that can be applied to written positive law and unwritten positive law.

The approach method in this study is a combination of the normative approach "legal research" with the empirical approach method "Juridical Sociologies". The research mechanism with this combined approach method is carried out by describing the explanation of the inductive research method leading to the deductive method and vice versa. This is done by the author to help explain the relationship between research variables and research objects so that it can produce an understanding that is very helpful for readers, especially researchers and academics.

This research was conducted at the Office of the Directorate of Criminal Investigation of the Riau Islands Regional Police, Jl. Hang Jebat No. 81, Batu Besar Village, Nongsa District, Batam City, Riau Islands Province. The population of this study were related officers at the Office of the Directorate of Criminal Investigation of the Riau Islands Regional Police. In determining the sample, the author took a sample based on the criteria of the problem to be studied, the criteria in question are the population and sample related to the problem in this paper. The sample in this study was 1 (one) structural official of the Head of Sub-Directorate 2 of the Directorate of General Criminal Investigation of the Riau Islands Police and 1 (one) investigator at the Directorate of General Criminal Investigation of the Riau Islands Police.

4. RESULTS AND DISCUSSION

Legal Regulations and the Role of Investigators in Enforcing the Crime of Rental Car Embezzlement

According to Article 1 number 1 of the Criminal Procedure Code, Investigators are police officers of the Republic of Indonesia or certain civil servants who are given special authority by law to conduct investigations. Then Article 6 of the Criminal Procedure Code emphasizes that investigators consist of police officers of the Republic of Indonesia and certain civil servants who are given special authority by law. This is regulated in Article 1 number 1 of the Criminal Procedure Code, which emphasizes that investigations are a series of actions by investigators in terms of and according to the methods regulated by law to seek and collect evidence that with that evidence sheds light on the criminal acts that have occurred and in order to find the suspect. Thus, investigators have a crucial role in ensuring that the legal process runs according to the rules and that every criminal act that occurs can be clearly revealed and the perpetrators can be arrested and tried.

Article 7 paragraph (1) of the Criminal Procedure Code grants investigators broad authority in carrying out their duties in investigating criminal acts. One of the main authorities held by investigators is to receive reports or complaints from someone about a crime. Investigators are responsible for taking the first action at the scene of the crime, which includes securing the scene, collecting initial evidence, and recording witnesses present at the location. This is a crucial step that helps ensure that evidence is not lost or damaged, and provides an initial basis for further investigation. With this authority, investigators can immediately begin the investigation process once they receive information about a suspected crime. Furthermore, investigators have the authority to order a suspect to stop and check the suspect's identification. This authority allows investigators to immediately identify suspects and ensure that they do not flee or remove relevant evidence.

Article 8 of the Criminal Procedure Code regulates the obligations of investigators in terms of making minutes, submitting case files, and additional investigations. According to Article 8 paragraph (1), investigators are required to make minutes regarding the implementation of investigative actions, including arrests, detentions, searches, and confiscations. These minutes must contain details of the actions taken by the investigator, the time and place of the incident, and the identities of the parties involved. Furthermore, Article 8 paragraph (2) states that investigators must submit case files to the public prosecutor after the investigation is considered complete. This submission includes all documents and evidence that have been collected during the investigation. If the public prosecutor returns the case files

to be completed, the investigator is required to conduct additional investigations in accordance with the instructions of the public prosecutor (Article 8 paragraph (3)).

Article 120 of the Criminal Procedure Code authorizes investigators to request the opinion of an expert or someone with special expertise in the context of examining a case. This is done if investigators require an explanation or technical information that is beyond their competence, such as in cases of economic crimes, cyber-crimes, or other crimes that require special analysis. This expert opinion is very important to provide a clearer picture of the technical aspects of the crime being investigated and can be used as evidence in court. Investigators can invite experts to provide testimony or prepare a written report explaining their findings. Article 127 and Article 132 of the Criminal Procedure Code regulate the actions of investigators in searches and examination of fake documents. Article 127 authorizes investigators to guard or close off places or houses that are searched for security and order. In carrying out a search, investigators are required to show identification and a search warrant to the suspect or his/her family. After the search is completed, investigators must make a report on the progress and results of the search.

Article 132 regulates the authority of investigators to examine letters suspected of being fake with the permission of the local district court chairman. Investigators can ask the general custodian to send the original letter that is stored as a comparison. This original letter is used to determine the authenticity of the letter suspected of being fake, and the results of this examination are stated in the investigation report. With this regulation, investigators can take the necessary actions to ensure that the evidence obtained is valid and legally accountable.

Modus Operandi of Rental Car Embezzlement in the Riau Islands Police Jurisdiction

The convenience provided by rental car owners is often misused by irresponsible tenants, damage to cars due to improper use, used as a means of committing crimes, even embezzlement of cars by selling or pawning them are risks that can befall rental car owners at any time. The emergence of criminal acts committed by tenants against rental cars is a form of abuse of rights or abuse of trust where the tenant understands that his actions violate the law which has a penalty in accordance with the provisions of Article 372 which reads: "Anyone who intentionally and unlawfully claims as his own property an item that is wholly or partly owned by another person but which is in his control not because of a crime that is threatened because of embezzlement with a maximum sentence of four years or a maximum fine of nine hundred rupiah".

On that occasion, the author conducted an interview with AKBP ADOLFIN C.N. TUERAH, S.H.60, as the Head of the Sub-Directorate of Criminal Investigation of the Riau Islands Police on April 1, 2024. Regarding the modus operandi in the criminal act of embezzlement of rental cars in the jurisdiction of the Riau Islands Police. Based on the interview, the efforts made by the police were: Based on the interview, there were facts about the modus operandi carried out, namely the Criminal Act of Embezzlement and/or Fraud and/or Evil Assistance. By renting the car and then pawning it to someone else without the knowledge of the original owner of the car.

Police Efforts and Obstacles in Tackling the Crime of Rental Car Embezzlement in the Jurisdiction of the Riau Islands Police.

Crime prevention efforts are actually continuous efforts. There is never a final effort. In this case, every crime prevention cannot guarantee that the crime will not be repeated or will not give rise to new crimes. However, these prevention efforts must continue to be carried out to better guarantee the protection and welfare of the community. On this occasion, the author conducted an interview with AKBP ADOLFIN C.N. TUERAH, S.H., as Head of Sub-Directorate 2 of the Criminal Investigation Directorate of the Riau Islands Police on April 1, 2024. Regarding the Police's Efforts and Obstacles in overcoming the crime of embezzlement of rental cars in the Riau Islands Police Jurisdiction. Based on the interview, the efforts made by the police were:

a. Preventive Action

Preventive action is an effort or action taken to prevent the possibility of crime. Efforts to take preventive action from various parties are considered to play an important role so that the expected results and goals can be achieved both directly and indirectly. What the police do is:

- 1) Conducting raids or patrols that are carried out in a targeted and regular manner on motor vehicles and their documents to ensure that the vehicles are not vehicles obtained from criminal acts, especially theft and embezzlement
- 2) Conducting supervision, inspection and searches on public roads, highways and ASDP (River, Lake and Ferry Transportation) roro ship crossing ports for all types of vehicles and establishing synergy between stakeholders
- 3) Conducting continuous legal counseling to the community and to every car rental business owner to be more careful and tighten their rental procedures to reduce the level of embezzlement crimes against rental cars

- 4) Counseling to the community, especially car rental entrepreneurs, to improve the security of their vehicles by installing a Global Positioning System (GPS), providing identification stickers so that cars are easily recognized in the event of embezzlement, and car rental entrepreneurs to be selective in choosing consumers or in recruiting drivers.

b. Repressive Action

Repressive action is any effort made by law enforcement officers after a crime has occurred. The effort aims to restore the unrest that was once disturbed, in other words that the perpetrator who has committed the crime has been given a punishment by law enforcement. The repressive actions taken by law enforcement officers to overcome the crime of embezzlement of four-wheeled motor vehicles belonging to rentals are, among others:

- 1) Conducting investigations and inquiries. Investigations according to Article 1 paragraph 5 of the Criminal Procedure Code are a series of investigative actions to search for and find an event suspected of being a crime in order to determine whether or not an investigation can be carried out according to the method regulated in this law to search for and collect evidence, which with that evidence makes clear about the crime that occurred in order to find the suspect. After the police have conducted an investigation at the scene of the crime, then continued with the investigation process. After arresting the perpetrator along with evidence, the investigator
- 2) Conducting an examination effort to obtain information from the perpetrator of the crime. If valid information and evidence can be collected, the suspect can be detained. After the examination is complete, the investigator submits the files of the results of the examination to the prosecutor, if the files are complete, the suspect is ready to be tried and sentenced by the court.
- 3) Surveillance, namely following someone suspected of being the perpetrator of a crime or another person who can lead to the perpetrator of a crime, finding out the activities, habits, environment, or network of the perpetrator of the crime.
- 4) Tracking, namely searching by following the whereabouts of the perpetrator of the crime using technology, information, cooperating with Interpol, related ministries/institutions/agencies/agencies.
- 5) Collecting evidence in connection with the investigation of the case and even trying to recover stolen goods, making detentions to then be handed over to the prosecutor's office who will later forward it to the court.

There are two obstacles that are often experienced in revealing embezzlement cases:

- a. Internal problems are problems that occur in the operations of the police themselves, such as:
 - 1) Facilities and infrastructure, with limited facilities for conducting counseling, thus limiting the room for Satbinmas to move. Limited accommodation funds available are also one of the inhibiting factors;
 - 2) Law enforcement against criminal acts of embezzlement requires quite a large amount of funds, this is because many cases of receiving motorized vehicles occur outside, so that handling them requires quite a lot of funds. Especially to summon witnesses who are outside the city and also the perpetrators who are mostly no longer in the jurisdiction of the Riau Islands Police.
- b. External problems are problems that must be faced from outside the operation, namely:
 - 1) The difficulty of presenting witnesses who know the incident of the perpetrator or defendant in obtaining the embezzled car which was then received, because when the embezzlement crime occurs, there are usually only victims and perpetrators and also public legal awareness is still low where people feel that going to court is taboo so that sometimes there are people who know about the embezzlement crime but are reluctant to testify in court.
 - 2) The embezzled car has been pawned to a third party. The reporting party is often late in reporting so that the difficulty of finding the embezzled car again becomes an obstacle for investigators to find its whereabouts. The embezzled rental car can be sold or pawned to a third party, namely the receiver, as in the example the author has provided. In addition, the perpetrators often remove the GPS (Global Positioning System) installed on the rental car engine, making it difficult for investigators and the rental party to track it.
 - 3) Searching for objects, because there are often changes to the vehicle plate numbers of the embezzled objects. However, with the special characteristics of the rental's four-wheeled vehicles, this obstacle can be overcome.

5. CONCLUSION AND SUGGESTION

Conclusion

Based on the discussion in the previous chapter, the following conclusions can be drawn:

- a. Legal regulation of the role of investigators in eradicating the crime of car embezzlement using the rental car method in the jurisdiction of the Riau Islands

Regional Police, includes various aspects regulated in the Criminal Procedure Code and other related regulations. Investigators have the authority to receive reports, take action at the scene, collect evidence, examine and arrest suspects, and compile case files to be submitted to the public prosecutor. Challenges such as internal and external factors, investigators are expected to be able to carry out their roles more efficiently and fairly, so that car embezzlement using rental car mobus can be eradicated and public trust in the law enforcement system can be increased.

- b. The modus operandi often used by perpetrators of rental car embezzlement is to abuse the convenience of renting a car provided by the rental service owner, using a fake identity and then pawning the car to someone else without the car owner's knowledge. The role of investigators in eradicating the crime of car embezzlement involves systematic and structured steps, starting from receiving reports and complaints, first actions at the scene, to thorough investigation and evidence collection. Investigators are responsible for ensuring that each report is followed up with high professionalism, evidence is collected and secured carefully, and the examination and arrest process is carried out in accordance with applicable legal procedures. By implementing these steps, investigators can improve the effectiveness and efficiency of investigations, ensure justice for victims, and strengthen public trust in the law enforcement system.
- c. Efforts made by investigators to overcome rental car embezzlement cases are through Preventive and Repressive methods. As for the preventive ones, namely providing legal counseling to the community and car rental owners and carrying out raids and Repressive actions, namely after receiving a report, the police conduct an investigation and investigation and collect evidence so that it can be submitted to the next stage. In addition, obstacles that are also often experienced are internal problems, namely: existing facilities and infrastructure and accommodation and external problems, namely: namely: summoning witnesses and reported parties who do not comply with summons from the Police and searching for objects of embezzlement because there are often changes in vehicle plate numbers and changes in color/shape of the object of embezzlement.

Suggestion

From this conclusion, the author can provide several suggestions, namely:

- a. It is suggested to investigators that due to internal constraints, it is necessary to increase the operational budget/accommodation in conducting investigations or investigations

into the crime of embezzlement of rental cars, because in the law enforcement process, some of the witnesses are outside the city of Batam and the object of embezzlement in the form of a car is not in the city of Batam, so it requires a fairly large operational budget. Meanwhile, for external problems, investigators need to coordinate well with investigators in other Polda areas, considering that some of the witnesses are not in the city of Batam, so they need assistance in the form of monitoring or surveys of witnesses who do not fulfill the investigator's summons.

- b. The police should provide counseling to car rental services regarding increasing security in running a four-wheeled vehicle rental business. This can be done by providing direction regarding the use of security tools or devices that can be used on vehicles to be rented, such as GPS or tracking devices so that if there is an alleged embezzlement of a vehicle, the police will be helped because they can find the embezzled vehicle
- c. The police can provide counseling to be careful in renting vehicles, especially to new tenants who are not previously known and also tenants who rent vehicles in large numbers at once. With the direction and cooperation from the rental party, it is hoped that in the future the handling of criminal acts of embezzlement of four-wheeled vehicles in the jurisdiction of the Riau Islands Police will be able to run more effectively and efficiently. For the rental party, it is better to increase the security standards in the vehicle rental services they have through standard procedures, for example by storing security deposits and other items as collateral, carefully checking the tenant both from the identity card which is not only the KTP but also the SIM then the party renting the vehicle must know the residence of the party renting to ensure that the person is not a criminal.

REFERENCES

- Arief, B. N. (2004). *Kebijakan legislatif dalam penanggulangan kejahatan*. Jakarta.
- Chazawi, A. (2003). *Kejahatan terhadap harta benda*. Universitas Negeri Malang.
- Dirdjosisworo, S. (1986). *Penanggulangan kejahatan (crime prevention)*. Bandung: Alumni.
- Fajar, M. N., & Achmad, Y. (2010). *Dualisme penelitian hukum normatif & empiris*. Yogyakarta: Pustaka Pelajar.
- Fakultas Hukum Universitas Batam. (2024). *Buku panduan penulisan proposal dan tesis*. Batam: Fakultas Hukum Universitas Batam.

- Fakultas Hukum Universitas Diponegoro. (1996). *Dengan pidana penjara* (Cetakan kedua). Semarang: Universitas Diponegoro Press.
- Hadjon, P. M. (1987). *Perlindungan bagi rakyat di Indonesia*. Surabaya: PT Bina Ilmu.
- Kansil, C. S. T. (2009). *Kamus istilah hukum*. Jakarta: Gramedia Pustaka.
- Kartanegara, S. (n.d.). *Hukum pidana kumpulan kuliah bagian satu*. Balai Lektor Mahasiswa.
- Lamintang, P. A. F. (1981). *Kitab pelajaran hukum pidana; Leeboek van het Nederlanches Straftrecht*. Bandung: Pionir Jaya.
- Moeljatno. (2000). *Asas-asas hukum pidana*. Jakarta: Rineka Cipta.
- Muladi. (2002). *Lembaga pidana bersyarat*. Bandung: Alumni.
- Perkap Nomor 6 Tahun 2019 Tentang Penyidikan Tindak Pidana..
- Poernomo, B. (1992). *Asas-asas hukum pidana*. Jakarta: Ghalia Indonesia.
- Shidarta. (2006). *Moralitas profesi hukum suatu tawaran kerangka berfikir*. Bandung: PT Revika Aditama.
- Soekanto, S. (1986). *Pengantar penelitian hukum*. Jakarta: UI Press.
- Soekanto, S. (2009). *Penelitian hukum normatif suatu tinjauan singkat* (Cetakan ke-11). Jakarta: PT Raja Grafindo Persada.
- Sudarto. (1990-1991). *Hukum pidana*. Purwokerto: Fakultas Hukum Universitas Jenderal Soedirman.
- Triatmodjo, P. (2013). *Peluang bisnis dunia otomotif*. Jakarta: Diva Press.
- Van Apeldoorn, L. J. (1985). *Pengantar ilmu hukum*. Jakarta: Pradnya Paramita.
- Undang-undang Dasar Negara Republik Indonesia Tahun 1945.
- Undang-undang Nomor 1 Tahun 1946 Tentang Kitab Undang-undang Hukum Pidana.
- Undang-undang Nomor 8 Tahun 1981 Tentang Hukum Acara Pidana.