

Juridical Analysis of the Application of the Presumption of Innocence in Criminal Investigation

Paulus Kostan Simonda¹⁾ & Moh. Muhibbin²⁾

¹⁾ Kongres Advokat Indonesia, Indonesia, E-mail: Paulsimonda73@gmail.com

²⁾ Universitas Islam Malang, Indonesia, E-mail: mohammad.muhibbin@unisma.ac.id

Abstract. *This study aims to determine the application of the presumption of innocence in the examination of criminal offenses. The type of research used is descriptive normative, with a statute approach, historical approach, conceptual, case and specific research. The results of this study indicate that the recognition of the presumption of innocence in the criminal procedure law applicable in our country contains two purposes. First, the provision aims to provide protection and guarantees to a human being who has been accused of committing a criminal offense in the process of examining a case so that his human rights are still respected. Secondly, these provisions provide guidance to officers to limit their actions in conducting examinations of suspects/defendants because they are human beings who still have the same dignity as those conducting the examination. One of the obstacles in the investigation process is that there are investigators who have not acted professionally in conducting investigations, resulting in actions that are contrary to the presumption of innocence.*

Keywords: *Criminal; Examination; Innocence; Investigation; Presumption.*

1. Introduction

The Unitary State of the Republic of Indonesia is a state of law based on Pancasila and the 1945 Constitution of the Republic of Indonesia, which upholds human rights and guarantees the rights of every citizen both in law and in government without exception. The existence of human rights guarantees is determined because, in every constitution, there is always a guarantee of human rights. Managing and respecting human rights according to the law is absolutely necessary in Indonesia.

According to the 1945 Constitution, judicial power is exercised by the Supreme Court and the judicial bodies under it in the general judicial environment,

religious judicial environment, military judicial environment, state administrative judicial environment, and by the Constitutional Court to administer justice to uphold law and justice as stipulated in Law No. 48 of 2009 concerning judicial power.

The implementation and enforcement of laws in Indonesia are still far from perfection. The main obstacle does not lie in the structure of the law or the types of legal regulations that exist, but in the implementation of the law. The public's expectation to obtain legal guarantees and certainty is still very limited. The implementation and application of the law are still not in line with the principles of justice and truth.¹

According to the guidelines for the implementation of the Criminal Procedure Code, the purpose of criminal procedure law is to seek and obtain or at least approach the material truth, which is the complete truth of a criminal case, by applying the provisions of criminal procedure law honestly and precisely with the aim of finding out who is the perpetrator who can be charged with committing a violation of the law and then requesting an examination and decision from the court to determine whether it is proven that a criminal offense has been committed and whether the person charged is to blame.

The purpose of law is to be created and enforced not only for the personal benefit of one individual but for the general benefit of all the people of the country. If laws are guidelines and standards, then they are the principles of human action. If intelligence is the basis of human action, then there is also something in intelligence that is the source of all other bases. The law, then, is based on reason. The ultimate foundation of all human actions and deeds, i.e., the ultimate goal of human life, is the object of practical rationality. The ultimate goal of human existence is actually to achieve pleasure and happiness. Therefore, the law must be linked to the pursuit of happiness. Every individual living in a country becomes an integral part of that entity, thus requiring the establishment of laws that aim to realize happiness at large.

The adoption of the presumption of innocence in KUHAP provides guidance to law enforcement officials on how to use the principle of accusation at every level of examination. The protection of human rights in the 1945 Constitution has been implemented in Law No. 39 of 1999 on Human Rights, Article 18: (1) Every person who is arrested, detained, and prosecuted because he is suspected of committing a criminal offense has the right to be presumed innocent until his guilt is proven legally in a court session and he is given the legal guarantees necessary for his defense, in accordance with the laws and regulations. (2) No

¹ Erman Rajagukguk, *Perlu Pembaharuan Hukum dan Profesi Hukum, Pidato Pengukuhan Sebagai Guru Besar Hukum Acara Pidana, Suara Pembaharuan*, p.11.

person shall be prosecuted, convicted, or sentenced to punishment except pursuant to a law or regulation that existed prior to the commission of the criminal offense.

The existence of guarantees for human rights (HAM) means that in every constitution there is always a guarantee for human rights (citizens). These guarantees are also present in the 1945 Constitution, specifically in several articles that regulate human rights. One of them is Article 27 paragraph (1), which is implemented in the criminal justice process as the Presumption of Innocence (APTBI), which is regulated in Article 8 (1) of Law Number 48 of 2009 concerning Judiciary, namely that "Every person who is suspected, arrested, detained, prosecuted, or brought before the court shall be presumed innocent until there is a court decision stating his guilt and obtaining permanent legal force."²

In addition to the provisions in Article 8(1) of Law No. 48/2009, it is also implied in Article 66 of Law No. 8/1981 on the Criminal Procedure Code. In addition, in the general elucidation of Law of the Republic of Indonesia Number 8 of 1981 Concerning the Criminal Procedure Code, point 3 letter c, it is expressly stated regarding the Presumption of Innocence that: "Every person who is suspected, arrested, detained, prosecuted, and/or brought before a court session, must be considered innocent until a court decision declares his guilt and obtains permanent legal force."³

In Indonesia, the presumption of innocence applies. The presumption of innocence operates prior to any official decision being made. A person who is declared innocent still prioritizes human rights, as noted by the court.⁴ It seems that the implementation of the principle of presumption of innocence in Indonesia is still not optimal. The granting of free-choice powers contradicts the principle of presumption of innocence. Often, arrests of people suspected of committing criminal offenses end in chaotic situations or are met with resistance from the alleged perpetrators. The police take the discretionary decision to shoot suspected criminals who are in distress and unexpected, thus making the perpetrators unable to escape police pursuit.⁵

One such case occurred in North Sumatra. He was shot by a police officer while a young man was relaxing in a shop. The police suddenly approached him and shot the man twice, killing the young man instantly. In his statement, the shooting

² Law Number 48 of 2009 concerning Judicial Power, Article 8

³ Law Number 8 of 1981 concerning the Criminal Procedure Code.

⁴ Tahir, Heri. 2011. *Proses Hukum yang Adil Dalam Sistem Peradilan Pidana di Indonesia*, Yogyakarta: LaksBang Pressindo.

⁵ Harahap, M. Yahya. 2006. *Memahami Hukum Kepolisian*. PT Rajagrafindo Persada: Jakarta

officer said the young man threw methamphetamine and argued with the victim until the police shot him. This belief is different from that of the witness, who said that what the police said was not true.⁶ It is unfortunate because, in this case, the perpetrator has not yet been proven guilty, especially with the different confessions between the police who carried out the shooting and witnesses in the field. In this case, when the perpetrator turns out to be innocent, it will cause material and immaterial losses for the victim and the victim's family.

Based on the above provisions, the importance of the presumption of innocence (APTBI) in the criminal justice process is evident. Therefore, it is crucial to conduct thorough research and examination of the policy regarding the application of the presumption of innocence in the criminal examination process and identify the factors that impede its implementation in the criminal justice system.

2. Research Methods

This research is normative juridical research, namely legal research conducted by examining library materials or secondary data with a statute approach, historical approach, conceptual, case, and research specifications. The normative juridical approach method emphasizes the approach of juridical norms or rules such as the law and its implementing regulations that regulate matters related to the problem. This approach also serves as a benchmark for finding data by focusing on the juridical aspects of the symptoms and events under investigation. In this approach, a lot of secondary data is used in the form of regulations, theories, and the opinions of scholars. The juridical aspect of this approach is the use of principles and various regulations related to the implementation of the presumption of innocence in the criminal justice process.

3. Results and Discussion

3.1. The Concept of the Presumption of Innocence in the Criminal Investigation Process

This principle is part of human psychological life. In every principle, man sees an ideal that he wants to achieve. A legal principle is an idea or an ideal, which does not describe a reality. Unlike the law which is a prescriptive life guide (*das Sollen*) on how humans should behave so that their interests can be protected.⁷

⁶ Wijana, Ekaristi. Viral Pemuda Tiba-Tiba Didor Polisi Di Warung Dikabarkan Tewas di Tempat tersedia pda situs https://jogja.suara.com/read/2020/06/25/191_509/viral-pemuda-tiba-tiba-didor-polisi-diwarung-dikabarkan-tewas-di-tempat accessed on 27 October 2020.

⁷ E. Nurhaini Butarbutar, 'Asas Praduga Tidak Bersalah: Penerapan Dan Pengaturannya Dalam Hukum Acara Perdata', *Jurnal Dinamika Hukum*, 11.3 (2011), 470–79 <<https://doi.org/10.20884/1.jdh.2011.11.3.175>>.

The principle of presumption of innocence in investigations is a protection of the rights of suspects provided by the Criminal Procedure Code and is very clearly regulated in Article 8 of Law Number 14 of 1970 concerning judicial power, which has been amended under Law No. 34 of 1999 and finally replaced by Law Number 4 of 2004. In Article 8 of Law Number 14 of 1970, it is stated that every person who is suspected, arrested, detained, prosecuted, and/or brought before the court must be considered innocent before a court decision that declares his guilt and obtains permanent legal force. In the Criminal Procedure Code, the presumption of innocence is explained in the General Elucidation of the Criminal Procedure Code point 3 letter c, namely, "Every person who is suspected, arrested, detained, prosecuted, and/or brought before the court shall be presumed innocent until a court decision declaring his guilt and obtaining permanent legal force." Meanwhile, in the Judiciary Law, the principle of presumption of innocence is regulated in Article 8 paragraph (1), which reads, "Every person who is suspected, arrested, detained, prosecuted, or brought before the court shall be presumed innocent until there is a court decision that states his guilt and has obtained permanent legal force."

With regard to the principle of presumption of innocence, Yahya Harahap said that "the suspect must be placed in the position of a human being who has dignity. He must be considered a subject, not an object. The examination does not focus on the human suspect. The examination focuses on the criminal act he committed. Towards the guilt of the criminal offense committed, the examination is directed. The suspect must be considered innocent, in accordance with the principle of presumption of innocence, until a final court decision is obtained."⁸

According to Nico Keijezer, to better understand the presumption of innocence, one must first understand the history of its development. In the Netherlands, it is recognized that Canon Law as the root of the presumption of innocence began to be reflected since 1010 in the decree of Bishop (priest) Burchard Van Worm, section XVI-C6, by referring to the decree of Paris Hadrianus, which states, "None of the litigants can be accused of being harmful, before there is first a trial that proves him guilty, based on his confession and the statements of witnesses who are strong enough to prove his guilt, so that a permanent decision is made that the defendant is guilty."⁹

⁸ Ledi A. Saroinsong, Nontje Rimbing, and Christine S. Tooy, 'Asas Praduga Tak Bersalah (Presumption of Innocence) Dalam Perspektif Hak Asasi Manusia', *Lex Administratum*, 11.1 (2023).

⁹ Sukirno & Sri Sudaryatmi Debora Maria Paramita Pasaribu, 'Tinjauan Yuridis Terhadap Pelaksanaan Asas Praduga Tak Bersalah Dalam Proses Peradilan Pidana', *Diponegoro Law Journal*, 6.02 (2015), 3.

The consequence of the presumption of innocence is that a suspect or defendant who is accused of committing a criminal offense still should not be treated as a guilty person, even though he can be subject to arrest or detention according to the applicable law. Thus, all parties, including law enforcement, must continue to uphold the human rights of the suspect or defendant.¹⁰

3.2. Application of the Presumption of Innocence in the Criminal Investigation Process

The presumption of innocence is essentially a manifestation of the role of the (modern) criminal justice system, which takes over the violent or retaliatory role of a state-appointed institution. Thus, any act violating individual rights must be addressed in accordance with the provisions of the applicable laws.¹¹

In KUHAP, the principle of presumption of innocence is explained in the General Elucidation of KUHAP point 3 letter c, namely, "Every person who is suspected, arrested, detained, prosecuted, or brought before a court session must be considered innocent until a court decision declares his guilt and obtains permanent legal force." Meanwhile, in the Judiciary Law, the principle of presumption of innocence is regulated in Article 8 paragraph (1), which reads, "Everyone who is suspected, arrested, detained, prosecuted, or brought before the court shall be presumed innocent until there is a court decision that states his guilt and has obtained permanent legal force."

The principle of presumption of innocence in terms of the juridical and technical aspects of the investigation is called the principle of accusation or inquisitorial. This principle of accusation places the position of the suspect or defendant at every level of examination.

a. It is a subject, not an object of examination; therefore, the suspect or defendant must be seated and treated in the position of a human being who has dignity and self-respect.

b. What becomes the object of examination under this principle of accusation is the "mistake" (criminal act) committed by the suspect or defendant, towards which the examination is directed. With the principle of presumption of innocence adopted, KUHAP provides guidelines for law

¹⁰ D Limbong, 'Tinjauan Hukum Tentang Penerapan Asas Praduga Tak Bersalah Dalam Proses Penyidikan Tindak Pidana Pembunuhan', *Focus Upmi*, 6.3 (2017), 119–26 <<http://journal.upmi.ac.id/index.php/FU/article/view/235>>.

¹¹ Tahir, Heri. 2011. *Proses Hukum yang Adil Dalam Sistem Peradilan Pidana di Indonesia*, Yogyakarta: LaksBang Pressindo

enforcement officials to use the principle of accusation at every level of examination.¹²

In general, the legal principles set out in Law No. 48/2009 on Judicial Power are provisions that apply generally in the process of implementing law and justice in Indonesia, covering all types of civil, criminal, and state administration cases. The law also clearly regulates several legal principles, including the principle of proof of innocence. Specific legal principles are legal principles that only apply in one specific legal domain.¹³

Article 8 Paragraph 1 of Law No. 48/2009 on Judicial Power explains that every person who is suspected, arrested, detained, prosecuted, or brought before the court must be presumed innocent before there is a court decision that states his guilt and has obtained permanent legal force. Every person undergoing a case process must be presumed innocent until a court decision with permanent legal force declares their guilt, in accordance with the provision known as the presumption of innocence.

The consequence of the presumption of innocence is that a suspect or defendant who is accused of committing a criminal offense must not be treated as a guilty person, even though he or she may be subject to arrest or detention according to the applicable law. Thus, all parties, including law enforcement, must continue to uphold the human rights of the suspect or defendant. The recognition of the presumption of innocence in our criminal procedure law serves two purposes. The provision aims to protect and guarantee the human rights of individuals accused of a criminal offense during the process of case examination. Secondly, these provisions provide guidance to officers on how to limit their actions in conducting examinations of suspects or defendants because they are human beings who still have the same dignity as those conducting the examination.¹⁴

In Chapter III of the Decree of the Minister of Justice of the Republic of Indonesia Number M.01.PW.07.03 of 1982 concerning Guidelines for the Implementation of the Criminal Procedure Code, it states that "As a person who has not been found guilty, he gets rights such as the right to immediately get an examination in the investigation phase, the right to immediately get a hearing by the court and get a fair decision, the right to be informed of what he is accused of in a language he understands, the right to prepare a defense, the right to get an

¹² Butarbutar, E. Nurhaini, 'Asas Praduga Tidak Bersalah: Penerapan Dan Pengaturannya Dalam Hukum Acara Perdata', *Jurnal Dinamika Hukum*, 11.3 (2011), 470–79 <<https://doi.org/10.20884/1.jdh.2011.11.3.175>>

¹³ Sudikno Mertodikusumo, *Penemuan Hukum Sebuah Pengantar*, Liberty, Yogyakarta, 2007, p. 9

¹⁴ Tahir, Heri. 2011. *Proses Hukum yang Adil Dalam Sistem Peradilan Pidana di Indonesia*, Yogyakarta: LaksBang Pressindo

interpreter, the right to get legal assistance, and the right to get a visit from his family."¹⁵

The recognition of the presumption of innocence in our criminal procedure law serves two purposes. The first purpose is to protect and guarantee the human rights of individuals accused of a criminal offense during the examination process. Secondly, officers should be guided on how to limit their actions in conducting examinations, recognizing that the person being examined has the same dignity as the person conducting the examination. The presumption of innocence closely relates to the criminal justice process, where a person becomes a suspect upon arrest until a judge declares their guilt.

Coercive measures that are not in accordance with procedures, laws, and regulations are contrary to the presumption of innocence and are a violation of human rights. The relationship between the presumption of innocence and the principle of equality in the law needs to be brought into line with human rights protections in order to support a fair and right trial. Law enforcers must guarantee and protect the human rights of every suspect and defendant in the process of examining criminal cases without distinction.

To realize an independent and impartial judiciary, there needs to be harmonious work integration between all law enforcers: investigators, prosecutors, public prosecutors, and judges. High integrity among judges is needed to realize a court decision that is in accordance with the sense of justice in the community. To achieve the process of examining criminal cases properly and correctly, there need to be juridical and non-juridical countermeasures.

3.3. Factors inhibiting the application of the presumption of innocence in the examination of the criminal justice system

Basically, the problematic application of the presumption of innocence in criminal cases is related to the unbalanced position between the suspect or defendant and the legal apparatus concerned, so that it is feared that there will be arbitrary actions from the legal apparatus. Criminal law, as public law, regulates public interests so that it relates to the state in protecting public interests, while civil law, which is private law, generally regulates private interests, leaving it to interested parties to claim their interests that have been violated in accordance with the principle of *point d'interet point d'action*. The unbalanced position in criminal cases allows for arbitrary treatment from the legal apparatus against suspects or defendants who are considered to have

¹⁵ Regulation of the Minister of Justice of the Republic of Indonesia Number M.01.PW.07.03 of 1982 concerning Guidelines for Implementing the Criminal Procedure Code

violated the public interest in the criminalization process as the person responsible for the imbalance of order in society due to a violation of the law.¹⁶

One of the obstacles in the investigation process is that there are investigators who have not acted professionally in conducting investigations, resulting in actions that are contrary to the presumption of innocence. There are several inhibiting factors in the process of applying the presumption of innocence that occur in the investigation process, including:¹⁷

1. In the process of interrogation (examination) of suspects related to certain cases, such as rape cases, cases of decency, adultery, and cases of domestic violence (KDRT), It is still difficult to obtain information. This is due to the tendency of suspects to be reluctant or feel embarrassed to tell their disgrace to investigators, making these cases difficult to investigate due to the absence of honesty and transparency from the suspect.
2. When the investigator conducts an examination of the suspect, the investigator also has difficulty obtaining information from the suspect because the suspect is convoluted in providing information, making the investigation process long and slow.
3. The suspect or defendant is suddenly sick, so this situation creates obstacles in the investigation process because it can stall or delay the investigation process.
4. The investigator's space is limited in uncovering a problem because a person cannot be considered guilty before a court decision that has permanent legal force.
5. The lack of effective development of the quality of supervision and control systems from relevant agencies and the lack of increased professionalism of law enforcers, who must be accompanied by dedication and a high sense of devotion to upholding justice.

With these inhibiting factors that have been explained by the previous compiler, basically the application of the presumption of innocence is in accordance with what is regulated in the law, but there are still several obstacles in the

¹⁶ Debora Maria Paramita Pasaribu, Sukirno & Sri Sudaryatmi, 'Tinjauan Yuridis Terhadap Pelaksanaan Asas Praduga Tak Bersalah Dalam Proses Peradilan Pidana', *Diponegoro Law Journal*, 6.02 (2015), 3

¹⁷ Feby Sri Yelvita, 'Implementasi Hak-Hak Tersangka Sebagai Asas Praduga Tak Bersalah', 8.5.2017, 2022, 2003–5.

investigation process that allow investigators to override or not be guided by the presumption of innocence.¹⁸

The views of checks and balances, separation of powers, freedom or independence of the judiciary, due process of law, which are vital foundations, and *rechtsstaat* (state of law) have not been discussed in depth by competent parties, so there is no concrete solution. As a result, the guarantee and protection of the human rights of suspects and defendants have faced an unfavorable situation, despite the implementation of various improvements through new regulations, including Law Number 8 of 1981 concerning the Criminal Procedure Code. Based on the results of research on articles in the Criminal Procedure Code and its implementing regulations, it turns out that juridically, it still does not show the harmonious application of the Presumption of Innocence (APT).¹⁹

In addition, reality shows that legal awareness from the community is an important indicator to support the implementation of a quality criminal justice process. In the practice of upholding the rule of law, there is still no good cooperation between law enforcers, the community, and the government.

4. Conclusion

From the description of the results and discussion above, it can be concluded that the principle of presumption of innocence in the investigation is a protection of the rights of the suspect provided by the Criminal Procedure Code and is very clearly regulated in Article 8 of Law Number 14 of 1970 concerning judicial power, which has undergone changes based on Law No. 34 of 1999 and was finally replaced by Law Number 4 of 2004. In Article 8 of Law Number 14 of 1970, it is stated that every person who is suspected, arrested, detained, prosecuted, and/or brought before the court must be considered innocent before a court decision that states his guilt and obtains permanent legal force. The recognition of the presumption of innocence in the criminal procedure law applicable in our country has two purposes. The provision aims to protect and guarantee the human rights of individuals accused of a criminal offense during the examination of a case. Secondly, these provisions provide guidance to officers on how to limit their actions in conducting examinations of suspects or defendants because they are human beings who still have the same dignity as those conducting the examination. One of the obstacles in the investigation process is that there are

¹⁸ Yelvita, Feby Sri, 'Implementasi Hak-Hak Tersangka Sebagai Asas Praduga Tak Bersalah', 8.5.2017, 2022, 2003–5

¹⁹ S.H. Rangga Sasmita, 'Penerapan Asas Praduga Tak Bersalah Tindak Pidana Pencurian', *Law Reform*, 7.1 (2011), 50–75
<<https://ejournal.undip.ac.id/index.php/lawreform/article/view/12501>>.

investigators who have not acted professionally in conducting investigations, resulting in actions that are contrary to the presumption of innocence.

5. References

D Limbong, 'Tinjauan Hukum Tentang Penerapan Asas Praduga Tak Bersalah Dalam Proses Penyidikan Tindak Pidana Pembunuhan', *Focus Upmi*, 6.3 (2017), 119–26
<<http://journal.upmi.ac.id/index.php/FU/article/view/235>>.

Debora Maria Paramita Pasaribu, Sukirno & Sri Sudaryatmi, 'Tinjauan Yuridis Terhadap Pelaksanaan Asas Praduga Tak Bersalah Dalam Proses Peradilan Pidana', *Diponegoro Law Journal*, 6.02 (2015), 3

E. Nurhaini Butarbutar, 'Asas Praduga Tidak Bersalah: Penerapan Dan Pengaturannya Dalam Hukum Acara Perdata', *Jurnal Dinamika Hukum*, 11.3 (2011), 470–79 <<https://doi.org/10.20884/1.jdh.2011.11.3.175>>.

Erman Rajagukguk, *Perlu Pembaharuan Hukum dan Profesi Hukum, Pidato Pengukuhan Sebagai Guru Besar Hukum, Suara Pembaharuan.*

Feby Sri Yelvita, 'Implementasi Hak-Hak Tersangka Sebagai Asas Praduga Tak Bersalah', 8.5.2017, 2022, 2003–5.

Harahap, M. Yahya. 2006. *Memahami Hukum Kepolisian.* PT Rajagrafindo Persada: Jakarta.

Law Number 48 of 2009 concerning Judicial Power, Article 8.

Law Number 8 of 1981 concerning the Criminal Procedure Code.

Ledi A. Saroinsong, Nontje Rimbing, and Christine S. Tooy, 'Asas Praduga Tak Bersalah (Presumption of Innocence) Dalam Perspektif Hak Asasi Manusia', *Lex Administratum*, 11.1 (2023).

Regulation of the Minister of Justice of the Republic of Indonesia Number M.01.PW.07.03 of 1982 concerning Guidelines for Implementing the Criminal Procedure Code.

S.H. Rangga Sasmita, 'Penerapan Asas Praduga Tak Bersalah Tindak Pidana Pencurian', *Law Reform*, 7.1 (2011), 50–75
<<https://ejournal.undip.ac.id/index.php/lawreform/article/view/12501>>.



Sudikno Mertodikusumo, 2007, *Penemuan Hukum Sebuah Pengantar*, Liberty, Yogyakarta,

Sukirno & Sri Sudaryatmi Debora Maria Paramita Pasaribu, 'Tinjauan Yuridis Terhadap Pelaksanaan Asas Praduga Tak Bersalah Dalam Proses Peradilan Pidana', *Diponegoro Law Journal*, 6.02 (2015), 3.

Tahir, Heri. 2011. *Proses Hukum yang Adil Dalam Sistem Peradilan Pidana di Indonesia*, Yogyakarta: LaksBang Pressindo.

Tahir, Heri. 2011. *Proses Hukum yang Adil Dalam Sistem Peradilan Pidana di Indonesia*, Yogyakarta: LaksBang Pressindo

Tahir, Heri. 2011. *Proses Hukum yang Adil Dalam Sistem Peradilan Pidana di Indonesia*, Yogyakarta: LaksBang Pressindo.

Wijana, Ekaristi. Viral Pemuda Tiba-Tiba Didor Polisi Di Warung Dikabarkan Tewas di Tempat tersedia pada situs <https://jogja.suara.com/read/2020/06/25/191509/viral-pemuda-tiba-tiba-didor-polisi-diwarung-dikabarkan-tewas-di-tempat> accessed on 27 October 2020.

Yelvita, Feby Sri, 'Implementasi Hak-Hak Tersangka Sebagai Asas Praduga Tak Bersalah', 8.5.2017, 2022, 2003–5