

# JURIDICAL REVIEW RETURN OF PERSONAL PROPERTY PROPERTY AGAINST CONVICTED CRIMINAL ACTS OF CORRUPTION

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## Abstract

*The purpose of this study is to find out what assets can be confiscated in criminal acts of corruption and to find out whether the confiscation of assets carried out by investigators against criminal acts of corruption is in accordance with the rule of law and what legal remedies can be taken to return these assets. In this study, the author uses a normative legal research method using a statutory approach, a case approach, and a conceptual approach. Based on the results of the study, it shows that property that is not the result or instrument of a criminal act of corruption cannot be confiscated unless the convict does not pay replacement money within 1 (one) month after the court decision that has obtained permanent legal force is read, the assets can be confiscated by the prosecutor. and auctioned to cover the replacement money and the confiscation should not be the property that is used as the defendant's livelihood. Legal remedies that can be taken for the convict if the investigator exceeds his authority in carrying out confiscation actions, pretrial legal remedies can be carried out at the investigation stage. Legal remedies for appeal, cassation and review can be carried out if the panel of judges has rendered a decision. A civil lawsuit can be filed if during the confiscation process it is known that assets that are not instruments or proceeds of a criminal act of corruption are also confiscated, causing material and immaterial losses to the plaintiff.*

**Keywords:** Confiscation, Legal Effort, Corruption Crime

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## 1. INTRODUCTION

In Indonesia itself there are several criminal acts where the process of settling cases is arguably still not optimal, one of which is corruption. Success in efforts to eradicate criminal acts of corruption cannot only be judged by simply submitting corruption convicts to court. This success is seen as insufficient if the state losses resulting from the criminal act of corruption committed by the corruptor cannot be recovered so that the corruptor's assets are confiscated and may not confiscate assets that have nothing to do with the corruption crime.

However, efforts to return state assets through confiscation of assets often violate the rights of convicts, such as confiscation of assets that are not in accordance with Article 39 of the Criminal Procedure Code regarding property that can be confiscated, namely:

1. Objects or claims of the suspect or defendant which are wholly or partly alleged to have been obtained from a criminal act or as the result of a criminal act;
2. Objects that have been used directly to commit a crime or to prepare it;
3. Objects used to obstruct the investigation of criminal acts;
4. Objects specifically made or intended to commit a crime;
5. Other objects that have a direct relationship with the crime committed.

Objects that are confiscated due to civil cases or due to bankruptcy can also be confiscated for the purposes of investigation, prosecution and trial of criminal cases, as long as they meet the needs of the confiscation mentioned above.

Confiscation of assets that were not obtained either in whole or in part through crime was also confiscated by law enforcement officials. The Association of Indonesian Supreme Court Instruction Letters and Supreme Court Instructions Number 37/TB/88/66/Pid also emphasizes that the confiscation should exclude items used as a buffer for convicts and their families to earn their daily living. The confiscation was due to the absence of a clear understanding or category regarding property used to make a living (Devi & Parwata, 2020).

In practice, the police, prosecutors and courts consider that these assets are not related to the livelihood of the convict's family, but the family insists on rejecting these efforts on the pretext that these assets are for earning a living, so that the police, prosecutors and courts are powerless to confiscate these assets because it can be said forms of deprivation without legal basis and violate human rights.

It is also often the case that the convict does not know what forms of efforts and mechanisms can be taken to return the assets that have already been confiscated and confiscated. The convict believes that only pretrial legal remedies as written in the Constitutional Court Decision Number 21/PUU-XII/2014 concerning the validity of the

confiscation and Articles 77 to Article 82 of the Criminal Procedure Code, appeals to Article 67, Article 233 to Article 243 of the Criminal Procedure Code, cassation efforts on Article 244 of the Criminal Procedure Code and efforts to review contained in Article 263 paragraph (2) of the Criminal Procedure Code which can be used as an effort to fight arbitrary confiscation . The confiscation should be carried out through appropriate tracing and data collection mechanisms so as not to harm the rights of the accused, where it is not certain that the entire property is the result of a criminal act of corruption.

The above description forms the author's basis for conducting research with the title "JUDICIAL REVIEW OF THE RETURN OF PERSONAL PROPERTY AGAINST CONVICTED CRIMINAL ACTIONS OF CORRUPTION"

## **2. METHODS**

The research method used by the author is normative or doctrinal legal research which is intended to examine and study law as a norm or principle to answer existing legal problems.

### **A. Data Source**

Primary Legal Materials are legal materials that are authoritative. The primary legal materials used include:

1. Civil Code
2. Law of the Republic of Indonesia Number 08 of 1981 concerning Criminal Procedure Code
3. Law of the Republic of Indonesia Number 30 of 2002 concerning the Corruption Eradication Commission
4. Law of the Republic of Indonesia Number 19 of 2019 concerning the Second Amendment to Law Number 30 of 2002 concerning the Corruption Eradication Commission.
5. Law of the Republic of Indonesia Number 8 of 2010 concerning Prevention and Eradication of Money Laundering Crimes.
6. Law of the Republic of Indonesia Number 20 of 2001 concerning Amendments to Law Number 31 of 1999 concerning Eradication of Corruption Crimes;
7. Law of the Republic of Indonesia Number 31 of 1999 concerning the Eradication of Criminal Acts of Corruption;

### **B. Secondary Data**

Secondary data is data that has been collected for purposes other than solving the problems being faced in the form of interviews, literature, articles, journals and sites on the internet relating to the research being conducted.

### C. Data Collection Methods

The author uses the technique of collecting and managing legal materials by:

1. Literature Study, conducted to obtain secondary data by reading, studying and citing legal materials.
2. Interviews were conducted with resource persons, namely judges and advocates.

### D. Data Analysis Methods

The data will be described and studied in relation to the existing problems so that a conclusion can be obtained as an attempt to solve the problem using an analytic descriptive method

## 3. RESULTS AND DISCUSSION

### A. Qualifications of Privately Owned Assets That Can Be Confiscated in Corruption Crimes

Assets or objects as something that can be owned or used as objects of property rights mean everything that can be given or placed a right on it, namely property rights. To obtain ownership rights to an object can be done in ways such as Recognition, Discovery, Submission, Expiration, Inheritance, Creation, and Follow-up or derivatives.

Corruption and Assets, these two things are two things that cannot be separated like two sides of a coin, where there is corruption there are also assets that are used or as the result of criminal acts of corruption, because side by side like that often when there are law enforcement efforts against acts criminal acts of corruption there are also attempts to confiscate assets against perpetrators of corruption. Confiscation of assets is an attempt to prevent losses to the state so that accused perpetrators of corruption do not lose, hide or transfer these assets to other people for the benefit of investigation, prosecution and trial, but in reality the confiscation is still not accurate enough, so it is carried out in violation of the law and violating the property rights of perpetrators of corruption

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Success in efforts to eradicate corruption is seen as sufficient if state losses can be recovered through the confiscation of the assets of the perpetrators of corruption and the confiscation is limited to assets related to criminal acts of corruption, such as assets that are instruments or as proceeds of corruption. assets that have nothing to do with corruption.

Legal protection is the right of every citizen which is closely related to human rights. The principle of presumption of innocence is a state principle that upholds the protection of human rights. Article 28 of the Law of the Republic of Indonesia Number 20 of 2001 concerning Amendments to Law Number 31 of 1999 concerning the Eradication of Corruption Crimes For the purposes of investigation, the suspect is required to provide information about all of his assets and the assets of his wife or husband, children and assets any person or corporation known and/or suspected of having a relationship with the criminal act of corruption committed by the suspect. The phrase "allegedly" in the law above cannot be applied immediately because the phrase "allegedly" has no limitations regarding the property either as an instrument or as the result of a crime because the phrase "allegedly" could be yes it could be no, if not is an instrument or the result of a criminal act of corruption, of course this is very detrimental to the suspect, both material and immaterial losses. (Da Rosa, 2018)

Investigators cannot arbitrarily confiscate an asset or property because it can violate the suspect's rights. Without sufficient evidence that these assets are related to criminal acts, either as tools, objects or proceeds of criminal acts, the final result may be assets that cannot be confiscated.

There are efforts to avoid acts of arbitrariness in asset confiscation, namely reverse evidence, suspects of corruption should be given the right to first prove the assets to be confiscated.

. Proof at the level of the investigative process is a form of application of the presumption of innocence. In addition, evidence at the initial investigative level aims to avoid the arbitrariness of investigators in carrying out unreasonable confiscation of assets belonging to suspects of corruption. or not, this aims to protect the rights of suspects and is useful for realizing a criminal justice system that is fair and upholds the application of the presumption of innocence.

Article 39 of the Criminal Procedure Code has actually outlined legal principles in the confiscation of objects which provide limits on objects that can be subject to confiscation. Article 39 of the Criminal Procedure Code contains: (Sugandhi, 1981)

- Objects or claims by the suspect or defendant which are wholly or partly suspected to have been obtained from a criminal act or as the result of a criminal act;

- Objects that have been used directly to commit criminal acts or to prepare;
- Objects used to obstruct criminal investigations;
- Objects specifically made or intended to commit criminal acts;
- Other objects that have a direct relationship with the crime committed;
- Objects that are in confiscation due to civil cases or due to bankruptcy, may also be confiscated for the purposes of investigation, prosecution and trial of criminal cases.

In Article 40 of the Criminal Procedure Code, investigators have the authority to confiscate objects or tools suspected of committing a crime for or other objects that can be used as evidence in the case of being caught red-handed and investigators have the authority to confiscate packages or letters or objects sent by and or for perpetrators of criminal acts accompanied by a receipt (Article 41 of the Criminal Procedure Code).

Confiscation of letters or other writings is permitted as long as they are not related to state secrets except with special permission from the Head of the local District Court unless the law stipulates otherwise with a closed court system, this is regulated in Article 43 of the Criminal Procedure Code. The types of objects that can be subject to confiscation are:

- a. `Objects or bills of suspects or defendants who are wholly or partially suspected of being instruments or of the criminal acts they have committed (Article 39 of the Criminal Procedure Code)
- b. `Packages or letters or objects sent or addressed by the suspect (Article 41 of the Criminal Procedure Code).
- c. `Letters or other documents as long as they do not involve state secrets (Article 43 of the Criminal Procedure Code)
- d. `Prohibited objects such as unlicensed firearms, explosives, certain chemicals, drugs, pornographic books or magazines and films, counterfeit money.

According to article 18 paragraph 2 of Law Number 31 of 1999 concerning the Eradication of Corruption Crimes as amended by Law Number 20 of 2001 confiscation of assets other than proceeds or instruments of criminal acts can only be carried out if the convict does not pay replacement money within 1 (one) month after the court decision which has permanent legal force is read out, said asset can be confiscated by the prosecutor and auctioned off to cover the replacement money. The RI Supreme Court Instruction Letter and Supreme Court Instruction Number 37/TB/88/66/Pid state that the confiscation of assets is exempted from goods used as a buffer for the convict and his family to make a living and it should be noted whether the confiscation is in accordance with the provisions Applicable law, this is to avoid confiscation errors such as confiscating assets that are not the result or instruments of corruption

and to avoid third party resistance due to wrongful confiscation of goods that do not belong to the convict.

Regarding the amount of the minimum value of assets and their changes that can be confiscated are regulated in laws and regulations. Criminal assets can be defined as criminal assets, namely all movable or immovable objects, whether tangible or intangible and having economic value obtained or suspected of originating from criminal acts, or which are intentionally used to commit criminal acts. According to R. Sugandhi that the booty also included animals, besides that, among other things were in the form of goods:

- a. That which is earned by crime
- b. Which is deliberately used to commit crimes

R. Sugandhi also emphasized that the items confiscated belonged to the convict. Ownership here means that it still belongs to the convict at the time the crime was committed or at the time the case was decided.

Assets are closely related to ownership rights. Personal property rights and/or property law are regulated in Book II of the Civil Code. Article 570 of the Civil Code which reads:(Abdulkadir, 2010; Soebekti, 2001)

The right of ownership is the right to enjoy an object more freely and to act on said object freely, as long as it does not conflict with laws or general regulations stipulated by the competent authority and as long as it does not interfere with the rights of other people, all of which do not reduce the possibility of revocation of rights in the public interest and appropriate co According to Prof. L.J. Van Apeldoorn, material rights are property rights that give direct power over something. Direct power means that there is a direct relationship between the people who are entitled to the object. As for the characteristics of property rights according to Prof. Sri Soedewi Masjchoen Sofwan is: (Sari, Sholihah, & Kusuma, 2022; Sofwan, 2000)

1. Property rights are parental rights to other material rights.
2. The right of ownership is the complete right.
3. Property rights are permanent, meaning that they will not vanish from other material rights.
4. Property rights are the essence of other objects.

Even though property rights are the most important material rights, there are several restrictions on property rights, namely:

1. General laws and regulations
2. Do not cause interference
3. The possibility of revocation of rights (onteigening).
4. Law of neighbors

5. Abuse of rights.

In general, how to obtain property rights is regulated in Article 584 of the Civil Code, namely:

1. Ownership/claim (toeigening)
2. Attachment/follow-up (natrekking)
3. Expired/exceeded time (verjaring)
4. Inheritance (erfopvolging), both according to law and will.
5. Appointment/delivery (leveraging)

Apart from being regulated in Article 584 of the Civil Code, how to obtain property rights is also regulated in articles outside Article 584 of the Civil Code, namely:

1. Becoming an object (zaaksforming)
2. Withdrawal of the fruit (vruchttrekking)
3. Unity of objects (vereniging)
4. Revocation of rights (onteigening)
5. Deprivation (verbeurdverklaring)
6. Mixing of assets (boedelmenging)
7. Dissolution of a legal entity
8. Abandonment

Meanwhile, the method of expiration of property rights is as follows:

1. Because someone else obtained the property right in one of the ways to obtain the property right above.
2. Because of the destruction of things.
3. Because the holder of the property rights releases the ownership rights to the object.

Based on these provisions, we can conclude that property rights are the most important rights when compared to other material rights, because the owner can enjoy them and control them as freely as possible for their objects, thus the owner of the object can transfer (sell, donate, exchange, donate), burden (pawn, fiduciary), rent and so on. In addition, the owner can perform material actions on the object, for example picking the fruit, using it, storing it, maintaining it and even destroying it. Property rights can end because if there is a violation or crime in owning a property right, for example a state official buys a house with money from corruption which later the court decides to confiscate the house then the house becomes under the control of the court, but it needs to be considered in confiscation of assets related to criminal acts of corruption, attached to a property right to the asset where such property rights can be obtained in a legal way and do not violate any applicable laws or legal norms, it will be a



violation of a person's rights if law enforcement confiscates something assets without being based on strong evidence regarding the procedures for acquiring these assets, whether the B. Efforts That Can Be Passed By Corruption Convicts To Retrieve The Confiscated Assets

The existence of provisions on the authority of investigators to carry out confiscation has been regulated in law, does not mean that it does not rule out the possibility of irregularities or abuse of authority by law enforcement to carry out confiscation of objects/assets owned by convicts. The provision of sanctions is expected to minimize the potential for irregularities or abuse of authority by law enforcers. If the violation or deviation relates to the rights of the convict, then the action will cause harm to the convict. The criminal mechanism allows convicts who feel disadvantaged by a judge's decision to take legal action, as stated in Article 1 point 12 of the Criminal Procedure Code.

Legal remedy is the right of the accused or public prosecutor not to accept a court decision in the form of resistance or appeal or cassation or the convict's right to submit a request for review in matters immediately according to the manner regulated by law.

Legal remedies according to criminal provisions can be divided into two, namely ordinary legal remedies and extraordinary legal remedies

#### 1. Ordinary Remedies

Ordinary legal remedies are legal remedies that are filed against decisions that have not yet become final and binding. According to Chapter XVII of the Criminal

Procedure Code, ordinary legal remedies can be in the form of appeals and cassation.

##### a. Appeal

An appeal is a legal tool which is the right of the accused and the right of the public prosecutor to request that the District Court's decision be re-examined by the High Court. A convict in a corruption case can request an appeal if it is felt that in the decision of the court of first instance there was a judge's mistake in determining the confiscated assets of the convict by attaching strong evidence regarding the origin of the assets (Mulyadi, 2000).

##### b. cassation

If at the appellate level it is felt by the convict that he has not received the appropriate sense of justice, the convict has the right to submit an appeal for cassation. Cassation is a legal tool which is the authority of the Supreme Court to re-examine decisions from previous courts. A request for cassation can be filed against an appellate court decision and a final level court decision from all jurisdictions (Wibisono, 2009).

## 2. Extraordinary Legal Remedies

Extraordinary legal remedies are legal remedies that are filed and are aimed at court decisions that have permanent legal force, where ordinary legal remedies are no longer possible.

Article 263 paragraph (1) of the Criminal Procedure Code states that against a court decision that has obtained permanent legal force, except for an acquittal or release from all lawsuits, the convict or his heirs may submit a request for review to the Supreme Court. Paragraphs (2) and (3) of the article regulate the reasons for submitting a review, namely:

- a. There is a new circumstance which gives rise to a strong allegation, that if the said situation had been discovered while the trial was still in progress, the result would be an acquittal or an acquittal of all lawsuits or the demands of the public prosecutor could not be accepted or lighter criminal provisions were applied to that case. In relation to the confiscation action, you can attach minutes of the purchase of assets, new witnesses and other evidence;
- b. In various decisions there is a statement that something has been proven, however the matter or circumstances as the basis and reason for the decision which is stated to have been proven are in fact contradictory to one another;
- c. There was an oversight by the judge or an obvious mistake in the decision
- d. If in that decision an act charged has been declared proven but not followed by a conviction.

Confiscation of property that is not related to criminal acts of corruption is also included in the form of violations of a person's civil rights because these assets are guaranteed by Law Number 8 of 2010 concerning the Prevention and Eradication of Money Laundering Crimes, namely assets are all movable objects or immovable objects, both tangible and intangible, obtained either directly or indirectly from the Civil Code (KUHPer) Article 499 which are called objects, namely each item and each right, which can be controlled by property. Violation of these rights means that investigators do not recognize, do not respect and even abuse the human rights of alleged corruption criminals as human beings who have the right to own property, resulting in real material losses and immaterial losses caused by the incessant mass media coverage which leads to stigma. negative for the alleged perpetrator and his family.

Confiscation of assets that are not related to criminal acts of corruption is also included in the form of violations of a person's civil rights because these assets are guaranteed by the Civil Code (KUHPer) Article 499 which is called property, namely each item and each right , which can be controlled by property rights. The act of confiscating property that is not related to

the criminal act of corruption that causes material and immaterial losses to suspected corruption can be carried out through legal remedies through a civil mechanism to the district court, to file a claim for rights to the court, then someone have to file a lawsuit. Lawsuit is a lawsuit filed by the plaintiff against the defendant through the court. The lawsuit can be in the form of an argument against the law contained in article 1365 of the Civil Code, related to the confiscation action carried out by investigators who are considered contrary to the applicable procedural law. The plaintiff can prove by being strengthened through court decisions which then returns the plaintiff's confiscated goods. Actions that are contrary to the procedural law then cause direct or indirect losses to the Plaintiff (Aris, 2012).

Attempts through a civil lawsuit against the confiscation of property that is not related to criminal acts of corruption have been carried out by Judge Syarifuddin in the Decision of the Supreme Court of the Republic of Indonesia Number 2580 K/Pdt.G/2013 dated 13 March 2014 which sued the Corruption Eradication Commission (KPK) regarding the return assets confiscated by the Corruption Eradication Commission (KPK) where in the decision the Supreme Court in its considerations stated that the items confiscated by the Corruption Eradication Commission (KPK) in the Criminal Case of Judge Syarifuddin turned out to be personal property and were not related to the crime committed by the Petitioner (Judge Syarifuddin) so that in this decision the Supreme Court sentenced the Defendant to the Corruption Eradication Commission (KPK) to return confiscated assets that were not related to a crime and to pay immaterial damages to the Plaintiff (Syarifuddin) in the amount of Rp. 100,000,000.- (one hundred million rupiah). (Muljono, 2012; Sarwono, 2012)

To be accepted and resolved by the court, a lawsuit must meet the following conditions:

- a) Has a legal basis
- b) There is a legal interest
- c) Contains disputes.
- d) The lawsuit is made carefully and clearly
- e) The plaintiff understands formal and material law

A plaintiff submits a lawsuit to the head of the district court, based on Article 8 paragraph (3) Rv there are three things that must be considered in a lawsuit as material requirements for a lawsuit:

- 1) Complete information from the litigants, namely name, address and occupation;
- 2) The basis of the lawsuit (fundamental petendi) which contains a description of the law, namely the existence of rights in a legal relationship which forms the juridical basis of the lawsuit and contains a description of the incident, namely an explanation of the case.

- 3) What is requested or demanded by the plaintiff to be decided by the judge (petitum). What is demanded can be broken down into two types, namely primary demands which are the main demands, and subsidiary demands which are substitute demands if the main demands are rejected by the judge.

From the elaboration above, it can be concluded that legal remedies that can be taken by convicts of corruption in the confiscation of assets that are not instruments or proceeds of corruption can be carried out through appeals, cassation and judicial review, and can also submit civil legal remedies (lawsuits) by construction of article 1365 of the Civil Code. Starting from that, the most basic thing is that there is no need for legal remedies if law enforcement by investigators complies with the rules governing the authority to carry out confiscations.

#### **4. CONCLUSION**

The conclusions of this thesis are based on the results of research by the authors and are supported by data, the information is as follows

- a. The limitation of assets that can be confiscated is in accordance with Article 39 of the Criminal Procedure Code and the confiscation of these assets is exempted from goods that are used as a buffer for the convict and his family to earn their daily living in accordance with the Association of Indonesian Supreme Court Instruction Letters and Supreme Court Instructions Number 37/TB/ 88/66/Pid
- b. Legal remedies that can be taken if the investigator exceeds his authority, especially in this case confiscation, pretrial legal remedies can be submitted, Appeals, cassation and judicial review can be carried out if the panel of judges has made a decision to confiscate assets that are not instruments and results of corruption. Civil lawsuits can be taken by the suspect on the grounds that the unlawful act was committed by the investigator, in this case, the confiscation action which resulted in material and immaterial losses with the argument of Article 1365 of the Civil Code "everyone who commits an unlawful act is obliged to compensate for losses arising from his mistakes. "is corroborated by existing evidence and decisions that have been made before.

#### **REFERENCES**

- Abdulkadir, M. (2010). *Hukum Perdata Indonesia*. Bandung: Citra Aditya Bakti.
- Aris, B. (2012). *Hukum Acara Peradilan Agama*. Jakarta: Raja Grafindo Persada.
- Da Rosa, S. (2018). Perlindungan terhadap Pelaku Tindak Pidana Korupsi dalam Pelaksanaan Perampasan Aset secara Tidak Wajar. *Jurnal Bina Mulia Hukum*, 2(2), 205–216.

- Devi, T. I. A. A., & Parwata, I. G. N. (2020). Harta Benda Yang Dapat Disita Dalam Tindak Pidana Korupsi. *Kertha Wicara*, 9(10), 1–10.
- Muljono, W. (2012). Teori dan Praktik Peradilan Perdata di Indonesia. *Jakarta Selatan: Pustaka Yustisia*.
- Mulyadi, L. (2000). *Pembalikan Beban Pembuktian Tindak Pidana Korupsi*. Bandung: Alumni.
- Sari, H. P., Sholihah, M., & Kusuma, A. P. (2022). Pemberdayaan Kelompok Masyarakat Suryasari dalam meningkatkan pelayanan dan pemasaran Agrowisata Petik Belimbing melalui Model Eduwisata STAR (Sharing, Trying, and Adventuring) berbasis produk Nata de Averrhoa carambola. *Prima Abdika: Jurnal Pengabdian Masyarakat*, 2(3), 299–311.
- Sarwono. (2012). *Hukum Acara Perdata Teori dan Praktik*. Jakarta: Sinar Grafika.
- Soebekti. (2001). *Pokok-Pokok Hukum Perdata*. Jakarta: Internusa.
- Sofwan, S. S. M. (2000). *Hukum Perdata: Hukum Benda*. Yogyakarta: Liberty.
- Sugandhi. (1981). *KUHP dan Penjelasannya*. Surabaya: Usaha Nasional.
- Wibisono, A. (2009). “*Penilaian Judex Jurist Terhadap Putusan Bebas Murni Yang Dimohonkan Kasasi Dalam Perkara Tindak Pidana Korupsi (Studi Kasus Korupsi Terdakwa ECW Nolo, Nurdin Halid, dan Fadillah Budiono)*.” Universitas Indonesia.