

Evaluation of Evidence in Electronic Criminal Case Trials

Esti Aryani*¹, Triwanto²

Universitas Slamet Riyadi

Corresponding Author: Esti Aryani anjunofarof@gmail.com

ARTICLE INFO

Keywords: Electronic Court, Evidence, Criminal Case, Trial

Received : 19 October

Revised : 20 November

Accepted: 21 December

©2022 Aryani, Triwanto : This is an open-access article distributed under the terms of the [Creative Commons Attribution 4.0 International](https://creativecommons.org/licenses/by/4.0/).



ABSTRACT

This study aims to study the validity of evidence and evidence in the electronic trial. One of the stages in the examination of criminal cases is proof. Proof is a problem that plays a role in the examination process at a court hearing, because through the evidence of the defendant's fate is determined. Assessment of the validity of the evidence and evidence in the electronic trial must still be in accordance with the provisions of the legislation. This study uses secondary data in the form of laws and regulations, literature books related to research material. The data obtained was then analyzed using a qualitative analysis method presented in the form of description. The results of the study found that the existing laws and regulations were not sufficient because there were no detailed provisions regarding the validity of both physical and electronic evidence used in electronic trials. Criminal procedural law reforms need to be carried out in order to be a standard guideline for the implementation of electronic trials.

INTRODUCTION

2020 is a tough year for the world community including Indonesia. Pandemi Covid 19 hit society throughout the world. The impact of pandemic hit all sectors of people's lives, starting from the health, economic, political and socio-cultural fields. Pandemi Covid-19 that hit Indonesia and the world resulted in changes in society (Hasudungan et al., 2022). Many aspects of people's lives have changed, one of which is justice. The trial is one of the processes in the criminal justice system carried out to find the truth of a criminal case. The trial process was carried out by bringing together the parties in one room in the court building (Nelson, 2020). In its current development it is possible to be carried out electronic trials, namely the procedure as stipulated in the Supreme Court Regulation Number 4 of 2020 concerning Administration and Criminal Case trial in the court electronically. Through the Supreme Court regulation, it is expected to provide guarantees for the protection of rights for justice seekers in a just and impartial judicial process, so as to guarantee the defendant's rights to immediately get legal certainty for criminal acts charged with him through trial without delay (Ali et al., 2022).

One of the stages in the examination of criminal cases is proof. Proof is a problem that plays a role in the examination process at a court hearing, because through the evidence of the defendant's fate is determined (Sumali & Monique, 2022). If the results of the evidence with the evidence determined by the law are not sufficient to prove the mistakes charged to the defendant, the defendant is released from the sentence, on the contrary if the defendant's mistakes can be proven by the evidence as determined by the Law, in this case the Book of Law Criminal Procedure Law (KUHAP) Article 184, the defendant must be found guilty and sentenced. The problem in the electronic trial is that there are no regulations governing the completeness of the evidence and evidence both physically and in the form of electronic documents, so that there are still differences of opinion among law enforcers regarding the validity of the evidence submitted in the electronic trial.

THEORETICAL REVIEW

Electronic Court

The Supreme Court of the Republic of Indonesia continues to try to do a big leap in providing fast, simple, and low-cost service to justice seekers. In accordance with the theme of the Special Session of the 2018 Annual Report, the New Era of Technology-Based Modern Justice, the Supreme Court of the Republic of Indonesia has launched an ecourt application that serves electronic case administration for justice seekers, including registration of cases (e-filing), payment (epayment), and Electronic (E-Summons) Calls (E-Summons). Electronic case administration services have provided convenience for justice seekers. Through the application, the Supreme Court of the Republic of Indonesia seeks to answer 3 (three) main problems that have been faced by the parties when they are litigating in court, namely delay (delay), access (access), and integrity (integrity). The use of information technology can reduce the time handling time, reduce the intensity of the parties to come to the court and reject

how to interact the parties with the court apparatus, and avoid the public from lack of information and knowledge about the court.

The Supreme Court of the Republic of Indonesia Since the issuance of the Supreme Court Regulation Number (Perma) 3 of 2018 concerning Case Administration in the Court Electronics is one step ahead of the use of information technology (Asimah, 2022). Through the Perma, the Supreme Court opened the tap of the registration of cases was carried out through electronics. On the 75th anniversary, the Supreme Court then perfected Perma No. 3 of 2018 with Perma No. 1 of 2019 concerning Case Administration and trial in an elektronic court. In this PERMA not only allows electronic registration of cases, but also regulates the procedures for electronic trials. The Supreme Court has carried out legal renewal and innovation in order to realize the principle of fast, simple, and light costs in the settlement of the case. Therefore the community as a service user, it is appropriate to use the facility. Seven benefits of electronic proceedings in court:

1. Save money with you electronically, the costs you spend will be less. The trial call for you will be submitted to the electronic domicile that you choose is the e-mail address (email) that you registered. Therefore, no cost is incurred to call you. For those of you who live far from the court location, access to the court certainly requires a lot of costs. With electronic proceedings, you will be less in spending money to get to the court site. This is based on the principles adopted in the process of handling cases in court namely the principle of basic, simple, and mild costs.
2. Save time for those of you who want to register cases to a crowded court, of course when you want to register the case it will require a longer time to queue. Not to mention when I have to queue to pay at the bank and even queue to be on. Through the e-Court the time you need to register for cases, pay the case fees, and the time for the trial will be more efficient and flexible. Therefore, e-Court is a solution for those of you who have a high activity.
3. Saving E-Court Personnel allows you to register cases, payment of case fees, trials, and take copies of the decision online and can be done anywhere. To do it all, you only need to use the e-court application that has been created by the Supreme Court. You can open the e-court application at the ecourt.mahkamahagung.go.id address. The application can not only be used by advocates, but since the launch of Perma number 1 in 2019, e-Courts can also be used by individuals. Of course with features and services that are not much different. All of these services you can use simply with your device. It is suitable for those of you who include lying people.
4. Preventing illegal levies since the judicial processing under the Supreme Court, the Supreme Court continues to make efforts to improve and innovate to eliminate illegal levies in judicial institutions in Indonesia. With e-Court, the intensity of the face to face of the judicial apparatus with court service

users will decrease. The consequences will decrease illegal levies. Because, almost ascertained, fees outside listed in e-court are illegal levies.

5. The current multi channel payment, the Supreme Court has collaborated with government banks in order to facilitate management of payment of case fees. The banks are BRI, BTN, Bank Mandiri, BNI, and BSI. These banks provide virtual accounts as a means of payment to the court where to register for cases. With the virtual account will make it easier for you to pay for case fees. Simply transfer via internet banking on your cellphone.
6. Filing well your data that has been uploaded in the e-Court application will be stored neatly on the server of the Supreme Court. Including your case archive is also stored in a case search information system (SIPP) integrated with the e-court application.
7. Transparent E-Court Application allows interaction between parties and the panel of judges in the context of an open case examination can be seen by all parties who are litigating. This e-Court application is also connected to the Application Directory of the Supreme Court Decision. The last application is a compilation of decisions from all courts in four judicial environments that can be accessed by anyone. This is a form of transparency and accountability of the Supreme Court, especially in terms of its decision.

METHODOLOGY

This study uses the approach of the law (statute approach). The law approach is carried out by examining all laws and regulations related to the legal issues studied. According to Muladi (1995) and Utari & Hasna (2020), reviewing the judge's decision is always interesting, because the judiciary product is an output of a fairly complex social process. This research is a normative legal research that prioritizes literature studies with data collection originating from libraries and other places (Wasito, 1997). This study uses secondary data in the form of laws and regulations, literature books related to research material (Melinda & Djajaputra, 2021). The data obtained was then analyzed using a qualitative analysis method presented in the form of description (Subchi et al., 2021).

RESULTS

Proof and Evidence in Criminal Cases

According to Harahap (1993), proof is a provision that contains a raising and guidelines on the ways justified by the law proves the mistakes charged to the defendant and also the provisions governing the tools by the judge to prove the mistakes charged. The process of proof of the defendant's problems is inseparable from the role of the evidence used in proof. The Criminal Procedure Code is definitively regulating what evidence tools can be used to prove the defendant's mistakes. Soebekti in Nugroho (2017) defines as something to convince the truth of an argument or establishment. Evidence, proof, proof

effort, *Bewijse Middle* are tools used to be used to prove the arguments of a party before the court. For example, written evidence, testimony, suspension, oath. Article 184 of the Criminal Procedure Code paragraph (1) regulates that valid evidence is:

- 1) Witness testimony
- 2) Expert information
- 3) Letter
- 4) Instructions
- 5) Defendant's statement.

Indonesian Criminal Procedure Law adheres to the minimum proof principle as stipulated in Article 183 of the Criminal Procedure Code which stipulates that the judge must not impose a criminal of someone except if at least two legitimate evidences he gained confidence that a criminal act actually occurs and that it is involved guilty of doing it.

Electronic Trial

In Article 1 number 12 Supreme Court Regulation Number 4 of 2020 concerning Administration and trial of the Electronic Criminal Case is set that the trial electronically is a series of processes of examining, prosecuting, and deciding the defendant's case by a court carried out with the support of information and communication technology, audio visual , and other electronic facilities. Furthermore, article 1 is also explained what is meant to prosecute is a series of judges' actions to receive, examine, and decide criminal cases based on free, honest, and impartial in the court in terms of and according to the way stipulated in the law -Electronic and electronic. Article 2 stipulates that the trial is carried out in the court room of the court in the presence of prosecutors and defendants accompanied by/ not accompanied by legal advisors, unless otherwise determined based on statutory provisions. Under certain circumstances, both since the beginning of the trial of the case or at the time of the trial of the case was ongoing, the judge/ panel of judges because of his position or at the request of the prosecutor and/ or the defendant or legal advisor could determine the trial carried out as referred to in paragraph (1) or electronically in a way :

1. Judges/ Panels of Judges, Substitute Registrars/ Registrars, and Prosecutors Single in the Court Court Room, while the defendant attended the hearing from the Detention Center where the defendant was detained accompanied by/ without being accompanied by legal advisors.
2. Judges/ Panels of Judges, Substitute Registrars/ Registrars Meeting in the Court Court Room, while the Prosecutor attended the hearing from the prosecutor's office, and the defendant was accompanied/ without being accompanied by a legal advisor to follow the hearing from the Detention Center/ prison where the defendant was detained,

3. In the event that the defendant was detained, he did not have special facilities to attend the hearing electronically, the defendant was accompanied/ not accompanied by a legal advisor, following the trial from the prosecutor's office, or
4. The defendant who was not detained could attend the trial in the courtroom of the court or from the prosecutor's office accompanied by/ not accompanied by legal advisors or other places inside or outside the jurisdiction of the court which judged and approved by the judge/ panel of judges by determining.

If the court hearing is conducted electronically, all session participants must be seen on the monitor screen with clear and clear votes. Substitute Registrar/ Registrar reported the readiness of the trial and ensured it was connected with the session participants to the judge/ panel of judges. In trials, judges, substitute clerks/ clerks, prosecutors, and legal advisors using the attributes of their respective sessions. The trial call to the defendant who was in detention detention was delivered through an electronic domicile. In the event that the defendant was not detained, the trial call was delivered by the prosecutor to the defendant through an electronic domicile in the form of a post-el, whatsapp address or SMS (Short Message Service). In the event that the defendant did not have an electronic domicile, the summons was submitted through a letter registered to the address where the defendant lived with a copy to the village head/ village head where the defendant domicile/ residence. The trial call is done no later than 7 (seven) days before the trial day. (Article 6). Electronic domicile is a message service (Messaging Sercives) in the form of a verified account owned by investigators, prosecutors, courts, defendants/ unity of the defendant, legal advisors, witnesses, experts, detention centers and prisons (article 1 number 9).

DISCUSSIONS

The role of evidence in the criminal case according to the Criminal Procedure Code

Proof is the central point of case examination at the trial. How to use and assess the power of proof of the evidence submitted at the criminal trial must be carried out in accordance with the provisions of the legislation in order to produce a court decision that realizes the truth. How to put the results of proof of the criminal case being examined is inseparable from the proof system adopted. In criminal procedural law there are several proof systems, namely:

1. Conviction in time (mere belief system)
2. Conviction raisonee (free proof)
3. Proof according to the law positively
4. Proof according to the law negatively (negative wettelijk stelsel)

Indonesian criminal procedural law as stipulated in the Criminal Procedure Code uses the theory of negative proof (negative wettelijk bewijstheorie) as seen in article 183 of the Criminal Procedure Code which reads

(Mahardhika et al., 2022), "The judge may not impose a criminal on someone, except if at least two legitimate evidences he gained confidence that a criminal offense really happened and that the guilty did not be guilty of doing it ". In proof of criminal cases, a study must be conducted in advance regarding evidence which is used as evidence that the defendant is guilty. According to this theory, the new judge may declare the defendant guilty and violate the provisions in criminal law if the terms of evidence have been fulfilled in accordance with the provisions of the Criminal Procedure Code and the judge's confidence in the case.

Assessment of Evidence Used in Proof of Criminal Cases in Electronic Trials

Today, the presence of electronic justice is expected to be a means to realize the principle of simple, fast and light costs desired by the Criminal Procedure Code. Electronic justice is expected to minimize community complaints as a justice seeker for the service and the random processing process, causing costs to be expensive. The application of the Electronic Court (e-Court) is very helpful in the realization of the vision of the Supreme Court to become the great Indonesian judicial body, which in the 10th point of the realization of the Vision of the Supreme Court in the blueprint for renewing judiciary 2010-2035 is to realize the modern judicial body based on integrated information technology (Susanto, 2020). With the development of information and telecommunications technology, in the practice of trial it is possible to emerge new types of evidence in electronic form such as: e-mail, examination using video conferences (teleconferences), electronic information, electronic documents and so on (Pratiwi et al., 2020).

Legally formally, the law of proof as stipulated in the Criminal Procedure Code has not accommodated electronic documents as evidence (Hambali, 2019). However, in some laws and regulations there have been recognized and regulating electronic evidence as valid evidence, namely: Law No. 30 of 2020 concerning the Corruption Eradication Commission, Law No. 24 of 2003 concerning the Constitutional Court, Law No. 11 of 2008 concerning Information and Electronic Transactions. As a guideline, the Supreme Court issued the Supreme Court Regulation Number 4 of 2020 concerning Administration and Criminal Case trial in the court electronically (Supreme Court, *Mahkamah Agung*, 2010). Although there has been a law on information and electronic transactions and other regulations it cannot be said that the Indonesian criminal procedural law has regulated the evidence used in the electronic trial. Likewise there are no rules regarding evaluation of evidence in electronic trials. The absence of procedural law rules that accommodate evidence including electronic evidence in an electronic trial causes uniformity in its application.

Neisa Aningrum, et.al in his research at the Palembang City District Court found that one of the problems faced in an electronic trial was about online proof (Adisti et al., 2021). In the online session, the judge decided with 2 (two) evidence and coupled with the judge's belief, in this case the judge was very difficult to capture it. And as a legal advisor is also very difficult to see the information delivered by the defendant because of the actual information. In this case there

are still considerable doubts for judges' beliefs and legal advisors because this material truth is the most important and becomes difficult if through online hearing. Proof of offline is carried out because to seek material truth or the actual truth that has been regulated in Article 184 of the Criminal Procedure Code, the evidence in question is witness statement, expert statements, letters, instructions, and statements of the defendant. Likewise, by using and assessing the power of proof attached to each evidence, carried out within the limits justified by the law. Although the legal basis for the implementation of the electronic trial is not yet detailed, as a guideline in Article 14 of the Supreme Court Regulation, it is regulated that in the case of the session carried out electronically which is carried out electronically, the evidence to be examined remains in the prosecutor's office. The prosecutor showed the evidence to the judge/ panel of judges electronically. In the case of the evidence in the form of printed documents, the judge/ panel of judges match the scanned documents contained in the case file with the original document shown by the prosecutor electronically. In the case of the evidence in the form of a non-print document, evidence can be photographed or divided and sent to the court post-el address in the trial before being submitted as evidence. In the event that the defendant submitted evidence that was alleviating, both in the form of print documents or non -print documents, the evidence was treated equally as the evidence referred to in paragraph (3) and paragraph (4). The judge/ panel of judges match the evidence sent as referred to in paragraph (3) and paragraph (4) with the original electronically.

Evidence in the form of electronic documents is regulated in Law No. 11 of 2008 concerning Information and Electronic Transactions as amended by Law No. 19 of 2016 concerning Amendments to Law No. 11 of 2008 concerning Information and Electronic Transactions. In Article 5 of the law is determined that letronics and/ or electronic documents and/ or printouts are legal evidence (paragraph 1). Electronic information or electronic documents and/ or printouts as referred to in paragraph 1 is an expansion of valid evidence and in accordance with the procedural law in force in Indonesia. (Paragraph 2). Based on the provisions of Article 5 paragraph 3 of the ITE Law it is regulated that electronic information and/ or electronic documents are declared valid when using an electronic system in accordance with the provisions of Article 6 of the ITE Law which stipulates that electronic documents are considered valid as long as the information listed in it can be accessed, displayed, guaranteed integrity and can be accounted for so as to explain a situation. The general explanation of the ITE Law further explains that electronic documents can be equalized with documents made on paper. Provisions regarding electronic information and/ or electronic documents do not apply to letters which according to the law must be made in written form, and letters and their documents which according to the law must be made in the form of a notarial deed or deed made by the deed-making official.

Muhammad Neil El Hilman as quoted by Asimah (2021) explained that so that digital evidence can be used as evidence at the trial must meet certain standards, namely: 1) Can be accepted, namely data must be able to be accepted and used for the sake of law from the interests of the investigation to the interests of the court , 2) Original, i.e. the evidence must be related to events/ cases that

occur and not engineering, 3) complete, ie evidence can be said to be good and complete if there are many instructions that can help the investigation, 4) can be trusted, namely evidence can be Saying what happens behind him, if the evidence can be trusted, then the investigation process will be easier and this condition is a must. From the description above it can be concluded that the assessment of the validity of the evidence and evidence in the electronic trial must still be in accordance with the provisions of the legislation. At present there is no law that regulates in detail regarding the examination of evidence or evidence in an electronic trial. Guidelines that can be used today are the Supreme Court Regulation of the Republic of Indonesia Number 4 of 2020 concerning Administration and Criminal Cases in the Court electronically. While related to digital evidence can use Law No. 11 of 2008 concerning Information and Electronic Transactions as amended by Law No. 19 of 2016 concerning Amendments to Law No. 11 of 2008 concerning Information and Electronic Transactions.

Although there have been regulations that can be used as guidelines, the regulation has not yet been complete and detailed in the procedure of examining evidence both physical and digital evidence when they want to be used in the process of proof at the electronic trial. In addition, there are also no provisions regarding how to display digital or electronic evidence in an electronic trial. In practice electronic evidence is displayed in different ways, such as presenting in the form of print or bringing to the trial of the device in which there is electronic evidence to the trial. This will result in the absence of certainty about the validity of evidence in an electronic trial. Therefore we need a standard rules that contain completely about the electronic trial process, including the problem of evidence and evidence. In order to answer the challenges of the era that experienced a fairly rapid technological development, it is necessary to immediately renew the Indonesian Criminal Procedure Code.

CONCLUSIONS AND RECOMMENDATIONS

Electronic justice has now become a necessity given the rapid development of information and communication technology. Through electronic courts, it is expected to be one way to realize the principle of simple, fast and lightweight justice, so that it can meet the interests of justice seekers to be able to get it immediately. Proof is a problem that plays a role in the examination process at a court hearing, because through the proof of the fate of the defendant determined. Assessment of the validity of evidence and evidence in the electronic trial must still be in accordance with the provisions of the legislation. At present there is no law that regulates in detail regarding the examination of evidence or evidence in an electronic trial. Although there have been regulations that can be used as guidelines in the form of the Supreme Court Regulation of the Republic of Indonesia Number 4 of 2020 concerning Administration and Criminal Cases in the Court Electronics and ITE Law, but the regulation is not yet complete and detailed regulates the procedure Examination of evidence both physical evidence and digital evidence when they want to be used in the proof process at the

electronic trial. Therefore a criminal procedural law reform is needed in order to be a standard guideline in the implementation of electronic trials.

FURTHER STUDY

In the event that the defendant did not have an electronic domicile, the summons was submitted through a letter registered to the address where the defendant lived with a copy to the village head/ village head where the defendant domicile/ residence. The trial call is done no later than 7 (seven) days before the trial day. (Article 6). Electronic domicile is a message service (Messaging Services) in the form of a verified account owned by investigators, prosecutors, courts, defendants/ unity of the defendant, legal advisors, witnesses, experts, detention centers and prisons

REFERENCES

- Adisti, N. A., Nashriana, N., Murilah, I., & Mardiansyah, A. (2021). PELAKSANAAN PERSIDANGAN PERKARA PIDANA SECARA ELEKTRONIK PADA MASA PANDEMI COVID 19 DI PENGADILAN
- Ali, M., Nurhidayat, S., Prabowo, M. S., & Muhammad, R. (2022). Corruption, asset origin and the criminal case of money laundering in Indonesian law. *Journal of Money Laundering Control*, 25(2), 455–466.
- Asimah, D. (2021). TO OVERCOME THE CONSTRAINTS OF PROOF IN THE APPLICATION OF ELECTRONIC EVIDENCE. *Jurnal Hukum Peratun*, 3(2), 97–110. <https://doi.org/10.25216/peratun.322020.97-110>
- Asimah, D. (2022). ELECTRONIC LITIGATION AS A MEAN OF EFFORT TO MODERNIZED LITIGATION IN THE NEW NORMAL ERA. *Jurnal*
- Hambali, M. A. (2019). POLICY MODEL FOR THE USE OF ELECTRONIC DOCUMENTS AS A PROOF TOOL IN CRIMINAL ACTION AFTER THE APPLICATION OF LAW NO 19 OF 2016. *UNTAG Law Review*, 3(1), 26. <https://doi.org/10.36356/ulrev.v3i1.1062>
- Harahap, M. Yahya. (1993). *Pembahasan Permasalahan dan Penerapan KUHAP Jilid II*, Pustaka Kartini
- Hasudungan, A. N., Ofianto, & Ningsih, T. Z. (2022). Learning Loss: A Real Threat in Education for Underprivileged Students and Remote Regions during the Covid-19 Pandemic. *International Journal of Distance Education and E-Learning*, 7(1), 12–23.
- Kitab Undang-Undang Hukum Acara Pidana (KUHAP)
- Mahardhika, V., Astuti, P., Rusdiana, E., Hikmah, N., & Ahmad, G. A. (2022). Challenges in the Implementation of the “Jalur Khusus” Concept in the Draft Indonesian Criminal Procedure Code. *SHS Web of Conferences*, 149, 02006.
- Mahkamah Agung, *Cetak Biru Pembaruan Peradilan 2010-2035*, Jakarta, 2010
- Melinda, S., & Djajaputra, G. (2021). Pembuatan Akta Notaris Di Luar Wilayah Jabatannya Berdasarkan Undang-Undang Nomor 2 Tahun 2014 Tentang Perubahan Atas Undang-Undang Nomor 30 Tahun 2004 Tentang Jabatan Notaris. *Syntax Literate ; Jurnal Ilmiah Indonesia*, 6(7), 3521–3541.

- Muladi. (1995). *Kapita Selekta sistem Peradilan Pidana*, BP Universitas Diponegoro, Semarang
- Nugroho, B. (2017). PERANAN ALAT BUKTI DALAM PERKARA PIDANA DALAM PUTUSAN HAKIM MENURUT KUHP. *Yuridika*, 32(1), 17.
- Peraturan Mahkamah Agung Nomer 4 Tahun 2020 Tentang Administrasi dan Persidangan Perkara Pidana di Pengadilan Secara Elektronik.
- Pratiwi, S. J., Steven, S., & Permatasari, A. D. P. (2020). The Application of e-Court as an Effort to Modernize the Justice Administration in Indonesia: Challenges & Problems. *Indonesian Journal of Advocacy and Legal Services*, 2(1), 39-56.
- Subchi, I., Arsadani, Q., Helmi, M. I., & Faridho, E. (2021). Legal Policy of Child Marriage In the Covid-19 Pandemic Period. *Samarah: Jurnal Hukum Keluarga Dan Hukum Islam*, 5(2), 846.
- Sumali, A. B. S., & Monique, C. (2022). Scientific Criminal Investigation Legal Studies in the Police Investigation Process. *KnE Social Sciences*.
- Susanto, S. (2020). E-COURT AS THE PREVENTION EFFORTS AGAINST THE INDONESIA JUDICIAL CORRUPTION. *Yustisia Jurnal Hukum*, 9(1), 116.
- UU No 11 Tahun 2008 Tentang Informasi dan Transaksi Elektronik
- UU No 19 tahun 2016 Tentang Perubahan atas UU No 11 tahun 2008 Tentang Informasi dan Transaksi Elektronik
- Utari, F., & Hasna, H. (2020). PERLINDUNGAN HUKUM BAGI PIHAK PEMBELI DALAM PERJANJIAN PENGIKATAN JUAL BELI YANG TIDAK TERLAKSANYA AKTA JUAL BELI AKIBAT PENOLAKAN DARI SEBAGIAN AHLI WARIS PIHAK PENJUAL BERDASARKAN KITAB UNDANG-UNDANG HUKUM PERDATA. *Jurnal Poros Hukum Padjadjaran*, 1(2), 191-209.
- Wasito, Hermawan. (1997). *Pengantar Metodologi penelitian Buku Panduan Mahasiswa*, PT Gramedia Pustaka Utama, Jakarta