



## Criminal Responsibility of Paranoid Schizophrenia Patients as Murder Perpetrators to Ensure Justice

Hafidz Wahyudin<sup>1\*</sup>, Yosvania Miranda<sup>2</sup>, Yuslikha Ramandhana Fauzi<sup>3</sup>, Raden Henda<sup>4</sup>, Gunadi Rasta<sup>5</sup>

Program Studi Hukum, Fakultas Hukum, Universitas Swadaya Gunung Jati

**Corresponding Author:** Hafidz Wahyudin [hafidzwahyudin04@gmail.com](mailto:hafidzwahyudin04@gmail.com)

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### ABSTRACT

This study aims to analyze criminal liability as a murder perpetrator who suffers from paranoid schizophrenia and its relation to the reasons for criminal elimination in accordance with Article 44 of the Criminal Code to ensure legal justice. The method used in this study is normative judicial with an approach to laws and cases from the court, after the legal materials that have been successfully collected are then systematically arranged and analyzed using a qualitative approach. The result of this study indicates that fraud that caused paranoid schizophrenia who commits the crime of murder can be subject to criminal sanctions or actions (double track system). In deciding such cases, the judge must prioritize the aspect of justice by considering the opinion of a psychiatrist who observes whether the cognitive function is disturbed or not when committing the crime of murder, if it is disturbed by characteristics such as hallucinations and delusions that cause the punishment to be unable to distinguish reality, fantasy and loss of self control, then it can be ordered in article 44 of the criminal code as a reason for forgiveness by eliminating responsibility, while if the cognitive function is not disturbed, it can be accounted for, then it can be accounted for criminally.

## INTRODUCTION

With the advancement of time, the number of crimes continues to increase, and the forms of these crimes – as well as the types of perpetrators – increasingly vary. Crime is an act that violates the law and is recognized as a criminal offense, such as the crime of murder. Murder is an act that results in the loss of a person's life, whether carried out unlawfully or not. In such cases, the perpetrator must commit a series of actions that directly cause another person's death, provided that the act was indeed intended to result in the victim's death.

In Indonesia, regulations regarding criminal acts of murder are stipulated in the Criminal Code (KUHP), specifically in Book II on Crimes, under Articles 338 and 340. Article 338 of the Criminal Code explains that murder committed intentionally to take someone's life is typically caused by the perpetrator's temporary emotional state and is classified as ordinary murder. Meanwhile, Article 340 of the Criminal Code outlines murder that is preceded by premeditation with the intent to take another person's life, commonly known as premeditated murder.

The perpetrators of murder are not only individuals with normal mental conditions but may also include individuals with mental disorders. One such mental disorder is schizophrenia, a psychiatric condition characterized by disturbances in thought patterns, perception processes, and social behavior. Symptoms of schizophrenia typically include positive symptoms such as hallucinations and delusions, as well as negative symptoms like social withdrawal, loss of motivation, or diminished abilities usually present in mentally healthy individuals. A specific type of schizophrenia is paranoid schizophrenia, in which sufferers are unable to think rationally and tend to be suspicious of everything around them.

According to an interview conducted by the author with Dr. Agraini, Sp.KJ, a psychiatrist at Permata Kuningan Hospital, paranoid schizophrenia is associated with intense fear and feelings, which often manifest as threatening hallucinations. These fears can lead sufferers to withdraw from their surroundings, believing that others pose a danger to them—or that they themselves might harm others. Paranoid schizophrenia is not permanent and may only occur during certain episodes or when triggered. To detect it, regular observation and interviews (anamnesis) with the patient are necessary. This includes auto-anamnesis, where the patient is directly asked about their daily activities, and hetero-anamnesis, where information is gathered from family members or colleagues for a more comprehensive understanding.

As a result of this condition, sufferers of paranoid schizophrenia may struggle with employment, social interactions, and adapting to their environment. Paranoid schizophrenia is considered a severe mental disorder that can trigger various symptoms which not only endanger the patient but also those around them. In such conditions, instinctive self-defense responses may arise spontaneously, potentially leading to dangerous and aggressive actions that could result in serious physical harm or even death.

Based on the above, it is possible for individuals with paranoid schizophrenia to commit criminal acts, such as in the case study of Decision

Number 150/Pid.B/2024/PN.Jkrt.Brt and Decision Number 10/Pid.B/2019/PN.Kph. In Decision Number 150/Pid.B/2024/PN.Jkrt.Brt, the defendant, Andi Andoyo Bin Adnan Sujiyono, who suffers from paranoid schizophrenia, committed premeditated murder as regulated under Article 340 of the Criminal Code. The murder took place near the Laguna Mall Central Park lobby in West Jakarta. The court ruled that the defendant was legally and convincingly proven guilty of committing premeditated murder as charged by the public prosecutor and sentenced him to 16 (sixteen) years in prison.

In contrast, in Decision Number 10/Pid.B/2019/PN.Kph, the defendant, Rheci Argasi Bin Hamidi, who also suffers from paranoid schizophrenia, was charged with premeditated murder under Article 340 of the Criminal Code. However, the court found that although the defendant was legally and convincingly proven guilty of murder as per the first charge of the public prosecutor, he could not be held criminally responsible due to exculpatory reasons. As a result, the judge acquitted the defendant of all legal charges and ordered the public prosecutor to place him in Soeprapto Mental Hospital in Bengkulu for one (1) year of psychiatric treatment.

From these two decisions, it is evident that there are differences in the verdicts handed down by the judges in cases involving similar charges—premeditated murder committed by defendants suffering from paranoid schizophrenia. It shows that judges, in deciding a case, use legal norms as a reference and a tool of assessment based on statutory regulations. In this context, the legal considerations used by judges play a crucial role in ensuring legal certainty in the pursuit of justice for society. Based on these events, the author is interested in analyzing the criminal liability of murder perpetrators suffering from paranoid schizophrenia to uphold justice.

## LITERATURE REVIEW

### 1. Definition of Criminal Liability

Criminal liability is a condition based on three elements of capability: the offender is aware that their actions violate criminal law provisions, the offender realizes that their actions have the potential to disrupt public order, and the offender commits the criminal act based on their free will. Roeslan Saleh stated that whether a person who has been charged with a criminal act is subsequently punished depends on whether they are at fault when committing the act. If the accused is indeed at fault, then they will be punished. Criminal liability, therefore, includes the commission of a criminal act by the perpetrator and the fact that the act is punishable under applicable law.

### 2. Definition of Murder

Murder is the act of taking another person's life, whether unlawfully or lawfully. To take someone's life, the perpetrator must carry out a series of actions that result in another person's death, with the intention of causing that death. In Indonesia, the regulations regarding the crime of murder are stipulated in the Criminal Code (KUHP), specifically in Book II on Crimes, under Articles 338 and 340. Article 338 of the Criminal Code explains that murder committed intentionally to take another person's life is usually driven by the perpetrator's

sudden emotions and is classified as ordinary murder. Meanwhile, Article 340 describes a murder preceded by planning and intention to kill, which is known as premeditated murder.

### 3. Definition of Schizophrenia

Schizophrenia is a mental disorder characterized by disorganized thinking patterns, perceptual disturbances, affective instability, and impaired social behavior. The symptoms commonly found in schizophrenia include positive symptoms such as hallucinations and delusions, and negative symptoms such as social withdrawal, self-neglect, and loss of motivation.

### 4. Definition of Paranoid Schizophrenia

Paranoid schizophrenia is a condition in which the sufferer frequently experiences hallucinations. This can be particularly dangerous if the person is free to interact in society, as their hallucinations may pose a threat to the lives of others. People with paranoid schizophrenia tend to be irrational and excessively suspicious of everything around them. In addition, they may experience auditory and perceptual hallucinations. As a result, individuals with paranoid schizophrenia often struggle to work or interact and socialize with others and their surroundings. Paranoid schizophrenia is considered a severe mental illness, and its symptoms can endanger both the sufferer and those around them.

### 5. Definition of Justice

Legal justice is the form of justice defined by law in terms of rights and obligations, and any violation of this justice is enforced through legal proceedings. This indicates that when someone violates justice, they will be subject to punishment through legal processes (i.e., retributive justice). Immanuel Kant stated that retributive justice holds that punishment should be based on wrongdoing, making criminal penalties appropriate for offenders. Punishment should be proportional to the offense because individuals are punished based on their fault, and not for any other reason.

## METHODOLOGY

The research method used is **normative juridical**, which, according to Soerjono Soekanto and Sri Mamudji, is a type of legal research conducted by examining relevant literature or secondary data sources. In conducting this study, the author employed a **statutory approach** and a **case approach**. Accordingly, the author analyzes legal issues within a concrete case under investigation, specifically Decision No. 150/Pid.B/2024/PN.Jkt.Br and Decision No. 10/Pid.B/2019/PN.Kph.

The collection of sources and types of data was carried out using **primary legal materials** and **secondary legal materials**, as well as previous research related to the object of study. These sources include legislation, legal books, legal dictionaries, legal journals, interviews, and various expert opinions obtained from literature that serve as the theoretical basis, such as doctrines, documents, or other legal materials.

To validate the legal materials used and ensure the accuracy of the data as the foundation for analysis, this research relies on **data collection methods such as observation and direct interviews** conducted by the author with a specialist psychiatrist. All collected legal materials were then organized systematically and analyzed using a **qualitative approach**. The analysis was conducted by examining and exploring the content of these legal materials, which were then presented in the form of a **qualitative descriptive exposition**.

## RESEARCH RESULT

### 1. Criminal Responsibility of Individuals with Paranoid Schizophrenia Who Commit Premeditated Murder

In the legal system, individuals who commit criminal acts are obligated to bear responsibility for their actions through appropriate punishment or sanctions. This aims to restore balance and maintain public order. Criminal liability itself refers to a condition where the perpetrator must meet three main elements: they are aware that their action violates criminal law, they understand that the act disrupts public order, and the act is committed consciously and voluntarily without coercion from any party.

According to Simons, a criminal act is a behavior that violates the law and is carried out intentionally by an individual who can be held accountable under statutory provisions and thus may be subject to punishment. In the context of criminal liability, there must be a causal relationship connecting the perpetrator's action to the criminal offense, based on a clear cause-and-effect link.

Criminal liability relates to the individual involved in the offense. However, not every person who commits a crime can be immediately punished. Further examination is required to determine whether the individual can be held criminally responsible, depending on certain circumstances. Relying on the theory of criminal responsibility proposed by Roeslan Saleh, the imposition of punishment depends on whether the individual can be deemed at fault when committing the act. If fault exists, the person should be punished; if not, no punishment should be imposed.

Criminal responsibility requires that the perpetrator be legally capable of being held accountable. The Criminal Code (KUHP) does not provide a clear definition or criteria for this capability. However, it is generally accepted that a person with normal mental capacity can be held responsible, as they can judge and act based on reason and legal norms. A defendant is presumed responsible unless proven otherwise.

The KUHP does not define the threshold at which someone is considered capable of criminal responsibility, but it includes provisions pointing to that capability, specifically in Book I, Chapter III, which addresses circumstances that eliminate, reduce, or aggravate punishment. Article 44 of the KUHP states that someone who commits an act but cannot be held accountable due to impaired or disordered mental condition (illness) cannot be punished.

In such a situation, the defendant lacks free will and cannot control or understand the consequences of their actions. This condition serves as a legal basis for exemption from criminal liability. Thus, Article 44 of the KUHP reflects negative conditions that indicate a person's inability to be held accountable.

The *Memorie van Toelichting* (MvT) of the KUHP elaborates on the reasons for exemption from punishment, known as grounds for non-accountability. There are two categories: first, internal factors (*inwendig*), such as incomplete psychological development or mental illness; second, external factors (*uitwendig*), outside the person's control. Article 44 supports the notion that a person suffering from mental impairment or illness cannot be criminally punished.

Therefore, individuals with paranoid schizophrenia who commit murder fall into the category of partial or full non-accountability due to their psychological background and thought disorders, including hallucinations—a hallmark of the illness. The completion of a premeditated murder act in such cases may be driven by irrational fear or perceived threats. However, some court rulings show disparities in the application of Article 44.

Indonesia's criminal law has since evolved, replacing the old Article 44 KUHP with Articles 38 and 39 of the 2023 Criminal Code (national KUHP). These provisions recognize mental disability, including paranoid schizophrenia, and allow for reduced punishment and/or the imposition of measures instead of regular sentencing.

In Decision No. 150/Pid.B/2024/PN.Jkrt.Br, the defendant Andi Andoyo Bin Adnan Sujiyono, suffering from paranoid schizophrenia, committed premeditated murder on Tuesday, September 26, 2023, at approximately 07:10 AM at the Lobby of Central Park Mall (Laguna Entrance) in West Jakarta. The defendant slit the victim's throat with a kitchen knife he had previously purchased online. This resulted in severe bleeding, and the victim collapsed face down on the floor. The defendant then fled the scene.

At trial, Dr. Henny Riana, Sp.KJ(K) diagnosed the defendant with paranoid schizophrenia, as confirmed by Psychiatric Forensic Report No: Sket-R/606/X/2023/RsBhayTk.I. The defendant reportedly spoke of chemicals, garbage, and unidentified particles affecting him. Another psychiatrist, Dr. Salikur Kartono, M.Biomed, Sp.KJ, stated that the defendant was unable to distinguish reality from delusion due to a functional mental disorder. Nevertheless, the court sentenced the defendant to 16 years' imprisonment, finding him guilty of premeditated murder under the first indictment.

In contrast, in Decision No. 10/Pid.B/2019/PN.Kph, defendant Rheti Argasi Bin Hamidi committed premeditated murder on Sunday, August 26, 2018, around 6:00 PM in Kepahiang, Bengkulu. He sought out the victim twice, armed with a 25-cm knife, and fatally stabbed the victim in the chest. A psychiatric assessment by Dr. Lucy Marturia BR Bangun, Sp.KJ, from Soeprapto Psychiatric Hospital, confirmed that the defendant suffered from severe paranoid schizophrenia (as per Forensic Report No: 4077/800/RSKJ/1.2/XI/2018). Although he appeared normal in grooming and hygiene, stress triggers could provoke hallucinations.

In this case, the court found the defendant legally guilty but exempted him from criminal responsibility due to mental illness, and instead ordered one year of psychiatric treatment at Soeprapto Psychiatric Hospital.

These cases illustrate that modern criminal law employs a double-track system, distinguishing between penal sanctions (punishments) and measures (treatment or protection orders). Penal sanctions are governed by the Criminal Code (KUHP), as described in Article 10 KUHP, which includes principal and additional punishments. Measures, on the other hand, are non-penal sanctions imposed outside the scope of the KUHP and serve more preventive and rehabilitative functions.

In premeditated murder cases under Article 340 KUHP, involving defendants with paranoid schizophrenia, judges must also consider these dual frameworks. According to Moeljatno, the determination of criminal responsibility should not rest solely with the judge, but requires collaboration with psychiatric experts. Experts must determine the presence of mental defects or illness, and the judge must then assess whether the defendant could be held accountable based on the expert's findings.

In Decision No. 150/Pid.B/2024/PN.Jkt.Br, Dr. Henny Riana, Sp.KJ(K) testified that the defendant had no cognitive impairment and was fully conscious and aware of his actions. In contrast, in Decision No. 10/Pid.B/2019/PN.Kph, Dr. Lusy Marturia BR Bangun, Sp.KJ found that the defendant exhibited flat emotional affect, delusional thoughts, and irrational fears.

Thus, determining the criminal responsibility of a perpetrator with paranoid schizophrenia must be based on expert psychiatric evaluations, ideally from certified mental health institutions. If the defendant was not experiencing an acute psychotic episode and acted consciously, then full criminal responsibility applies and punishment can be imposed under Article 340 KUHP. However, if the defendant was experiencing a psychotic episode at the time of the offense, they cannot be held criminally liable. In such cases, Article 44 KUHP applies, and the court should impose treatment measures, such as compulsory psychiatric care, instead of punishment.

## **2. Legal Analysis of Sanctions Against Perpetrators of Premeditated Murder with Paranoid Schizophrenia in Pursuit of Justice**

Article 44 of the Indonesian Criminal Code (KUHP) provides a justification ground (*alasan pemaaf*) by viewing a criminal case from the perspective of the perpetrator, specifically regulating the inability to bear criminal responsibility due to the offender's mental disorder – whether caused by defective mental development or a mental illness. Article 44(2) KUHP states that if an act cannot be attributed to the perpetrator due to mental incapacity, the judge may order the individual to be placed in a mental hospital for a maximum of one year as a probationary period.

In this context, mental hospitals function as rehabilitation centers for offenders suffering from severe mental illnesses such as paranoid schizophrenia. Furthermore, according to Article 39 of Law Number 17 of 2023 on Mental Health, a person with a mental disability who commits a criminal act while in an acute psychotic episode, or who suffers from moderate to severe intellectual disability, cannot be sentenced to a criminal punishment.

From the perspective of legal theory and the objective of legal certainty, judges are not strictly bound to apply Article 44 of the KUHP or Article 39 of Law

No. 17 of 2023 when adjudicating cases involving defendants with paranoid schizophrenia. Mental incapacity resulting from a developmental or disease-based mental disorder is not interpreted from a medical perspective, but rather as a legal concept. The legal benchmark lies in the correlation between the defendant's mental condition and the criminal act, which may indicate a lack of criminal responsibility.

However, determining the nature of that correlation is within the authority of the court, not the psychiatric expert – though the expert's opinion may serve as an important consideration in judicial decision-making. In rendering a decision, judges are expected to carefully examine all elements based on the facts revealed during trial.

Legal scholar Wiryo Kusumo asserts that judicial "consideration" (*considerans*) refers to the reasoning or legal arguments used by a judge to decide a case. Therefore, when ruling on premeditated murder cases committed by individuals with paranoid schizophrenia, the judge must consider not only legal certainty but also justice.

Judicial certainty must be supported by credible evidence, including witness testimony, expert opinions, and other admissible evidence presented during the trial. The pursuit of justice is inherently tied to the principle that people facing similar legal situations should not receive significantly different outcomes, unless justified.

In the Indonesian context, justice is also a fundamental principle rooted in Pancasila, specifically the fifth principle, which embodies collective societal values. Justice is interpreted through the lens of human dignity, encompassing one's relationship with oneself, with others, with society, with the nation and the state, and with God.

Thus, in premeditated murder cases committed by individuals with paranoid schizophrenia, the judge is the sole authority empowered to impose punishment, based on an assessment of all evidence – particularly psychiatric expert testimony.

Justice in criminal responsibility must be closely tied to the proportionality between the severity of the criminal act and the punishment imposed. In other words, the sentence imposed must correspond with the degree of fault attributable to the defendant.

When examining the two previous rulings, it is evident that although both defendants suffered from paranoid schizophrenia and committed premeditated murder, the resulting punishments differed, revealing a phenomenon known as legal disparity (*disparitas hukum*).

According to Bismar Siregar, achieving justice may sometimes require sacrificing legal certainty, as law is merely a tool, while justice is the ultimate goal. For example, in Decision No. 150/Pid.B/2024/PN.Jkt.Br, the judicial panel upheld the law with an emphasis on justice by considering the psychiatric expert's opinion, witness testimony, and other evidence, ultimately fulfilling the elements of Article 340 of the KUHP on premeditated murder.

On the other hand, in Decision No. 10/Pid.B/2019/PN.Kph, although the legal criteria for Article 340 KUHP were met, the judge prioritized justice over

strict legal certainty, citing a justification ground for the defendant and issuing a non-penal sanction in the form of compulsory psychiatric rehabilitation.

## **CONCLUSIONS AND RECOMMENDATIONS**

Criminal responsibility for defendants suffering from paranoid schizophrenia may fall under Article 44 of the Indonesian Criminal Code (KUHP) as a justification ground. However, this does not serve as an absolute exemption, as sentencing in such cases may adopt the double track system concept—incorporating both penal sanctions and non-penal measures, depending on the defendant’s mental state at the time the premeditated murder was committed.

If the act was committed consciously and the defendant's cognitive function was not impaired, then the defendant can be held criminally responsible. Conversely, if the act was carried out unconsciously or the defendant’s cognitive function was impaired, then criminal responsibility cannot be imposed, and a treatment-based measure such as placement in a mental hospital for recovery should be applied instead.

Based on the judges' considerations in both decisions, the rulings can be considered fair, as the judges took into account psychiatric expert testimony, which served as a crucial piece of evidence in trial proceedings. In rendering their judgments, the judges did not solely focus on legal certainty, but also on justice—by weighing the proportionality of the sentence against the degree of fault and the defendant’s mental condition. This approach demonstrates the judges' efforts to strike a balance between the enforcement of the law and humanitarian understanding, which is key to achieving true justice.

## **ADVANCED RESEARCH**

Future research could focus on the comparative legal analysis of criminal responsibility in cases involving mental illness, particularly in relation to paranoid schizophrenia. A detailed study comparing Indonesia's legal framework, particularly Articles 44 of the Criminal Code (KUHP) and Law No. 17 of 2023 on Mental Health, with similar provisions in other jurisdictions could provide valuable insights. This would help in understanding how other legal systems address the intersection of mental illness and criminal responsibility, and whether alternative models might be applied to improve the handling of such cases in Indonesia.

Moreover, further studies should evaluate the practical outcomes of the double track system, which combines penal sanctions with mental health rehabilitation measures. Research could focus on the effectiveness of placing mentally ill offenders in psychiatric hospitals as a rehabilitative measure and assess the long-term impacts on recidivism. It would also be valuable to explore the consistency of psychiatric evaluations in court, and whether clearer guidelines or improved tools for assessing criminal responsibility could help reduce disparities in sentencing for defendants suffering from mental disorders.

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