

Rehabilitation of Corruption Convicts: A Modern Sentencing Theory Perspective

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ABSTRACT

This study examines the application of rehabilitation for individuals convicted of corruption offenses through the lens of modern sentencing theory, and proposes normative criteria for its implementation within Indonesian positive law. Using a normative juridical method with statutory, conceptual, and case-based approaches, legal materials were analyzed qualitatively. The findings reveal that rehabilitation in Indonesian law rests on a strong constitutional foundation as an attributed power of the President, and has progressively evolved into an instrument for protecting individual rights within the criminal justice system. However, the existing legal framework remains incomplete, as it does not explicitly accommodate rehabilitation for convicts whose sentences carry permanent legal force—particularly in corruption cases that intersect with business decision-making. From a modern sentencing theory perspective, rehabilitation functions as a corrective mechanism to shield individuals from potential state error, provided it does not compromise the public interest in eradicating corruption. Accordingly, five strict normative criteria are proposed for its application: (1) demonstrable error in the criminal conviction, (2) a lawful basis of authority, (3) relevance to the business judgment rule, (4) adherence to the principle of proportionality, and (5) assurance that no impunity is created. Rehabilitation, under these conditions, should be viewed not as a weakening of criminal law, but as an integral corrective mechanism within the rule of law that sustains a balance among legal certainty, justice, and social utility.

Keywords: rehabilitation; corruption; modern sentencing theory; business judgment rule; rule of law.

INTRODUCTION

A nation's identity is inseparable from the philosophical foundation that guides its governance. This idea was central to Sukarno's conception of Pancasila, introduced on June 1, 1945, as a philosophical worldview (*Weltanschauung*) for the Indonesian state. Among Pancasila's five principles, the second—just and civilized humanity—and the fifth—social

justice for all Indonesian people—are particularly relevant to the legal obligations of the state. Together, they mandate that the law must deliver justice, legal certainty, and social utility (Anisa & Putro, 2025).

Despite this constitutional aspiration, Indonesia's law enforcement landscape continues to struggle with two persistent categories of challenge. The first is structural: weak integrity and professionalism among law enforcement officers, resource constraints, and susceptibility to political interference (Daeng et al., 2024). The second is substantive: ambiguous and overlapping legal norms, along with rapid and uncoordinated legislative changes, produce inconsistencies in legal application (Yusuf et al., 2025). These deficiencies create conditions under which wrongful prosecution and punishment become real possibilities, eroding both individual rights and public trust in the rule of law.

This concern is not merely theoretical. It is illustrated concretely by the case of Ira Puspadewi, the former Chief Executive of PT ASDP Indonesia Ferry (Persero), as documented in Decision No. 68/Pid.Sus-TPK/2025/PN Jkt.Pst. The case arose from decisions she made in her capacity as director—decisions that prosecutors argued crossed into the domain of corruption. The case raised difficult questions about the boundary between legitimate business risk and criminal liability, and ultimately prompted President Prabowo Subianto to grant her rehabilitation in November 2025.

Corruption in Indonesia is classified as an extraordinary crime (extra ordinary crime), warranting stringent enforcement. Yet this stringency must not become a pretext for criminalizing business decisions or administrative acts that do not genuinely satisfy the elements of a criminal offense. As Satjipto Rahardjo has argued, law should serve humanity and not the reverse—when the law fails to protect human dignity and rights, the rule of law loses its essence (Rahardjo, 2009). Eddy O.S. Hiariej similarly notes that modern criminal

law must also function to protect individuals from the potential arbitrariness of state power (Hiariej, 2014).

Rehabilitation emerges as a critical instrument in this context. When applied appropriately, it reconciles legal certainty, justice, and utility by restoring the status, reputation, and civil rights of individuals who were wrongly convicted or erroneously processed by the state. Barda Nawawi Arief has argued that an ideal criminal sentencing policy must always leave room for corrective action against errors in law enforcement, given that the criminal justice system is inherently vulnerable to both structural and substantive failures (Arief, 2016).

Despite its constitutional basis and practical importance, rehabilitation in Indonesian positive law remains underregulated—particularly with respect to convicts whose sentences have acquired permanent legal force (*inkracht van gewijsde*), and even more so in corruption cases that overlap with corporate or business decision-making. This regulatory gap raises urgent questions about the normative criteria that should govern the application of rehabilitation in such cases.

This study therefore pursues two primary objectives: (1) to map the legal framework of rehabilitation in Indonesian positive law; and (2) to analyze, through the lens of modern sentencing theory, the conditions under which rehabilitation can be legitimately applied to corruption convicts, and to propose clear normative criteria for such application.

METHODS

This research adopts a normative juridical approach, a well-established methodology in Indonesian legal scholarship that focuses on examining legal norms, rules, and doctrines as objects of scientific inquiry (Ibrahim, 2016; Irianto, 2017). The study employs a descriptive-analytical specification, meaning it both describes the relevant legal norms and systematically analyzes their implications for the research problem.

Three complementary research approaches are deployed. First, the statutory approach (pendekatan perundang-undangan) involves a thorough examination of constitutional provisions, legislation, and subsidiary regulations relevant to rehabilitation and corruption. Key instruments include the 1945 Constitution of the Republic of Indonesia (particularly Article 14), the Anti-Corruption Law (Law No. 20 of 2001 amending Law No. 31 of 1999), the new Criminal Procedure Code (Law No. 20 of 2025), the Criminal Code (Law No. 1 of 2023), and the Limited Liability Company Law (Law No. 40 of 2007).

Second, the conceptual approach (pendekatan konseptual) engages with legal doctrines and scholarly theories, including the rule of law, theories of legal authority, modern sentencing theory, the business judgment rule (BJR), and the concept of criminal policy as social policy.

Third, the case approach (pendekatan kasus) involves a close reading of the legal reasoning in Decision No. 68/Pid.Sus-TPK/2025/PN Jkt.Pst., which serves as the primary judicial reference for this study.

Data sources are exclusively secondary, comprising three categories of legal materials: (1) primary legal materials—constitutional and statutory texts; (2) secondary legal materials—scholarly books, law review articles, and expert commentary; and (3) tertiary legal materials—legal dictionaries, encyclopedias, and bibliographies that provide contextual clarification (Moleong, 2018). Data analysis follows the qualitative juridical method, which involves systematic literature review, normative argumentation, and synthesis of legal reasoning to produce conclusions that respond to the research questions (Nurbani, 2018).

RESULTS AND DISCUSSION

The Legal Framework of Rehabilitation in Indonesian Positive Law

Rehabilitation in Indonesia is grounded in a strong constitutional foundation. Article 14(1) of the 1945 Constitution grants the President the authority to grant pardon (grasi) and rehabilitation, with consideration from the Supreme Court. This authority represents an

attributed competence (kewenangan atribusi)—one that derives directly from the constitution rather than from delegation or mandate (Hadjon, 1994). As Jimly Asshiddiqie emphasizes, all state power in a constitutional democracy must be bounded and controlled by law; attributed authority does not exempt its holder from the principles of legality, accountability, and proportionality (Asshiddiqie, 2006).

The most significant recent development in the legal regulation of rehabilitation is Law No. 20 of 2025 on the Criminal Procedure Code (KUHAP). Article 1(42) of this law defines rehabilitation as the right of a person to obtain restoration of their capability, position, dignity, and honor as a consequence of errors in the law enforcement process. Critically, this right applies across the entire arc of criminal proceedings—from investigation and prosecution through trial and sentencing. This represents a paradigm shift: rehabilitation is no longer treated as a mere administrative afterthought but has been elevated to a fundamental right within the integrated criminal justice system.

This shift is reinforced by Article 2 of the new KUHAP, which guarantees the rights of suspects, defendants, and convicts within a unified justice system, and by the Code's explicit linkage of rehabilitation to the broader concept of compensation (*ganti rugi*). Under Article 1(41), compensation arises when law enforcement actions are unlawful or legally erroneous. Together, these provisions signal a growing recognition of state responsibility for errors in criminal proceedings.

The new KUHAP also reflects the influence of restorative justice principles. Rehabilitation in this framework extends beyond legal status to encompass the restoration of a person's social position—their standing in the community. This is consistent with the trajectory of modern criminal law, which increasingly treats the criminal justice system not merely as an instrument of repression but as a mechanism for achieving substantive justice through remediation.

Nevertheless, the existing framework retains significant limitations. Rehabilitation remains primarily constructed around procedural errors occurring prior to a final judgment. There is no explicit provision addressing rehabilitation for individuals whose convictions have acquired permanent legal force (*inkracht van gewijsde*), and the framework does not specifically address scenarios in which a conviction results from the misclassification of a business decision as a criminal act. This gap is particularly acute in corruption cases, where the line between legitimate business risk and criminal liability is often contested.

Presidential authority over rehabilitation, while constitutionally robust, is also constrained by the principle of *doelmatigheid*—the requirement that every exercise of state authority be proportionate to its enabling purpose (Hadjon, 1994). Bagir Manan further notes that constitutional prerogative powers in modern legal systems are never value-neutral; they must be exercised in a manner that is rationally justifiable and publicly accountable (Manan, 2004). These principles establish that rehabilitation is not an unconstrained discretionary power, but one that must operate within a normative framework that upholds the rule of law.

Rehabilitation in the Context of Corruption and the Business Judgment Rule

The application of rehabilitation to corruption convicts introduces a distinctive tension. Corruption is classified as an extraordinary crime (*extra ordinary crime*) in Indonesia, justifying heightened enforcement and more limited procedural protections for accused persons. As Romli Atmasasmita has argued, corruption is a systemic crime that threatens the institutional architecture of the state (Atmasasmita, 2011). Any mechanism that could be perceived as softening accountability in corruption cases must therefore be scrutinized with exceptional care.

This is precisely the function of the Business Judgment Rule (BJR). The BJR is a legal doctrine, widely recognized in corporate law, that protects directors from civil and criminal liability for business decisions made in good faith, on the basis of adequate information, and

within the scope of their authority, even if those decisions ultimately result in corporate losses. Panjaitan, Anggusti, and Nababan describe the BJR as a legal shield that insulates directors from liability for loss-causing decisions provided those decisions were taken in good faith and with due care (Panjaitan et al., 2021).

This distinction was central to the Supreme Court's reasoning in a related precedent (Decision No. 121 K/Pid.Sus/2020), where the Court held that a decline in corporate value (impairment) does not constitute real financial loss to the state—and therefore cannot serve as the evidentiary basis for a corruption conviction (Tetuko & Adam, 2022). Monica similarly argues that the BJR operates as a legal protection for directors from liability where the conditions of good faith and due care are demonstrably satisfied (Monica, 2024).

The implication for rehabilitation is significant. When a conviction is premised on a misclassification—treating a legitimate business risk as a criminal act—the foundational requirements of criminal liability are not genuinely met. In such circumstances, the state has effectively punished an individual not for a crime, but for the economic outcome of a decision made in good faith. Rehabilitating such a convict is not an act of impunity; it is an act of corrective justice.

Modern Sentencing Theory and the Justification for Rehabilitation

Modern sentencing theory provides the normative architecture for justifying rehabilitation as a corrective mechanism within the criminal justice system. The retributive model of punishment—which views incarceration as an end in itself, proportionate only to the gravity of the offense—has been progressively superseded by integrative models that account for the social, rehabilitative, and corrective functions of punishment.

Muladi and Barda Nawawi Arief describe this shift as a movement from purely retributive sentencing toward an integrative approach in which societal protection and individual rehabilitation become co-equal objectives (Muladi & Arief, 2010). Sudarto situates this

within a broader framework: punishment must protect society while simultaneously maintaining a balance between individual interests and the public good (Sudarto, 1986). Arief further specifies that the criminal justice system must incorporate mechanisms for correcting state error, precisely because such errors are structurally inevitable in any complex institutional environment (Arief, 2016).

These insights connect directly to Marc Ancel's concept of criminal policy as a rational organization of the social reaction to crime (Ancel, 1965). Criminal policy, in this view, is not reducible to enforcement alone; it encompasses the full range of state responses to crime, including rehabilitative and corrective measures. Arief places this within the matrix of social policy, arguing that criminal law must simultaneously serve social welfare (*kesejahteraan sosial*) and social defense (*perlindungan masyarakat*) (Arief, 1994). The modern social defense school—associated with Filippo Gramatica—similarly holds that social protection must be pursued through rational and humane means, not through excessive repression (Hiariej, 2014).

The principle of individualization of punishment is equally central to this analysis. Arief argues that sentencing must be tailored to the concrete circumstances of the offender and the act, rather than mechanically applied (Arief, 2008). Muladi affirms that the objectives of punishment include protection for both society and the offender (Muladi, 1995). When sentencing fails to reflect the actual degree of culpability—because the underlying conduct was misclassified—proportionality is violated, and the normative basis of the sentence is undermined. In that situation, rehabilitation is not a privilege; it is a corrective imperative.

The extraordinary nature of corruption does introduce genuine constraints on this corrective logic. Atmasasmita's characterization of corruption as a systemic crime that undermines state institutions means that any rehabilitative measure applied to corruption convicts must be assessed against the risk of creating impunity or weakening deterrence (Atmasasmita, 2011).

Hiariej's point that modern criminal law must also protect individuals from state arbitrariness (Hiariej, 2014) must therefore be balanced against the structural imperatives of anti-corruption enforcement.

The resolution of this tension lies not in refusing rehabilitation altogether, but in imposing rigorous normative criteria that distinguish genuine corrective rehabilitation from a disguised form of impunity. Rehabilitation that meets such criteria strengthens, rather than undermines, the integrity of the criminal justice system—because it demonstrates the state's capacity to distinguish between criminal culpability and business risk, and to correct its own errors when the latter has been wrongly treated as the former.

Proposed Normative Criteria for Applying Rehabilitation to Corruption Convicts

The analysis above converges on a clear finding: the existing legal framework in Indonesia does not provide explicit guidance on the conditions under which rehabilitation may be applied to corruption convicts whose sentences carry permanent legal force. This regulatory gap creates legal uncertainty and risks both the arbitrary grant and the arbitrary denial of rehabilitation. Drawing on the constitutional framework, modern sentencing theory, and the doctrinal analysis developed above, this study proposes five normative criteria that should govern such applications.

The first criterion is the existence of a demonstrable error in the criminal conviction. Rehabilitation is justified only where there is an objective, legally articulable basis for concluding that the sentencing was substantively flawed. This may take the form of a failure to prove *actus reus* or *mens rea*, an error in the interpretation or application of the relevant criminal provisions, or a misclassification of the conduct in question. The standard is not mere disagreement with the outcome of a judicial proceeding; it is the identification of a specific and cognizable legal error.

The second criterion is a lawful basis of authority. Under the constitutional framework, the President's authority to grant rehabilitation derives from Article 14(1) of the 1945 Constitution and is an attributed competence. Its exercise must comply with the principle of legality—it must be procedurally regular, substantively justified, and accompanied by consideration from the Supreme Court. Any departure from these procedural requirements would undermine the legitimacy of the rehabilitative act and expose it to legal challenge.

The fourth criterion is adherence to the principle of proportionality. The rehabilitative measure must be proportionate to the nature and magnitude of the legal error identified. Proportionality operates in two directions: the rehabilitation must be sufficient to remedy the harm caused by the erroneous conviction, but it must not extend further than warranted by the specific legal deficiencies identified. An overly broad rehabilitative act could create the appearance of exoneration for conduct that, while not constituting the specific offense charged, may nonetheless have involved other legal or ethical violations.

The fifth criterion is the assurance that no impunity is created. This is the most politically and institutionally sensitive of the criteria. Given the systemic importance of anti-corruption enforcement in Indonesia, any rehabilitative act in a corruption case must be accompanied by clear public justification demonstrating that it is grounded in specific legal error rather than political accommodation. Manan's requirement that constitutional prerogative powers be rationally justifiable (Manan, 2004) translates, in this context, into a demand for transparency: the grounds for rehabilitation must be publicly stated, legally defensible, and subject to academic and civic scrutiny.

These five criteria constitute a normative framework that can fill the regulatory gap identified in Indonesian positive law. Applied rigorously, they ensure that rehabilitation in corruption cases serves its legitimate corrective function without compromising the state's credibility as an enforcer of anti-corruption norms. Rehabilitation that satisfies these criteria is not an act

of impunity; it is a demonstration of the state's commitment to the rule of law—including the rule that no one may be punished for conduct that does not genuinely constitute a crime.

CONCLUSION

This study has examined the legal framework of rehabilitation in Indonesian positive law and analyzed, through the lens of modern sentencing theory, the conditions under which rehabilitation can be legitimately applied to corruption convicts.

Three principal conclusions emerge. First, rehabilitation in Indonesia rests on a strong constitutional foundation as an attributed authority of the President under Article 14(1) of the 1945 Constitution, and its legal profile has been significantly enhanced by the new Criminal Procedure Code (Law No. 20 of 2025), which elevates it to a fundamental right within the criminal justice system. Nevertheless, the existing framework does not explicitly accommodate rehabilitation for convicts whose sentences carry permanent legal force, creating a regulatory gap that requires normative resolution.

Second, from the perspective of modern sentencing theory, rehabilitation of corruption convicts is justifiable—but only in limited circumstances. Specifically, it is warranted when the underlying conviction was premised on a misclassification of conduct—most notably, when legitimate business decisions protected by the Business Judgment Rule were incorrectly characterized as acts of corruption. In such cases, the foundational requirements of criminal liability (*actus reus* and *mens rea*) were not genuinely satisfied, and rehabilitation functions as a corrective mechanism that restores substantive justice without creating impunity.

Third, to operationalize rehabilitation in a manner consistent with both the rule of law and the imperatives of anti-corruption enforcement, this study proposes five normative criteria: (1) demonstrable error in the criminal conviction; (2) a lawful basis of authority for the rehabilitative act; (3) applicability of the Business Judgment Rule to the conduct in question;

(4) adherence to the principle of proportionality; and (5) assurance that no impunity is created, evidenced through transparent and publicly accountable justification.

These criteria do not weaken anti-corruption enforcement; they strengthen it. A criminal justice system capable of correcting its own errors is a more credible and legitimate system than one that treats finality as more important than justice. Rehabilitation, properly constrained, is part of what makes a rule-of-law state worthy of that description.

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