

Legal Analysis of Decision Number 110/Pid.B/2021/PN KPH Concerning the Criminal Act of Fraud Using the Online Arisan Scheme

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ABSTRACT

The development of information technology has changed the patterns of social and economic interaction in society, providing convenience while also opening up opportunities for criminal acts, particularly fraudulent online social gatherings (arisan). Decision Number 110/Pid.B/2021/PN Kph is important to study because it reflects the application of criminal law to electronic-based crimes characterized by numerous victims and significant losses. This research focuses on the implementation of criminal law regulations and the judge's considerations in the decision. This study uses a normative legal method with a statute approach and a case approach. Legal materials were obtained through literature review and analyzed qualitatively using a deductive method, linking legal norms to the trial facts in the decision. The results indicate that the judge's application of Article 378 of the Criminal Code was appropriate because the element of fraud was legally proven. However, the punishment imposed is deemed not to reflect justice and expediency, considering the magnitude of the losses, the number of victims, and the lack of restitution for the victims. In conclusion, the application of criminal law in the decision is partially effective, because it only fulfills the aspect of legal certainty, but is not optimal in realizing justice, benefit, and deterrence.

Keywords: Online Arisan, Criminal Law, Fraud

INTRODUCTION

Technological developments and social dynamics have brought about changes in patterns of interaction and economic activity, which on the one hand provide convenience, but on the other hand also open up opportunities for various forms of crime.¹ In this context, criminal law plays a role as an instrument to maintain order and provide legal protection to society from harmful acts.

¹ Afifah Sahfitri and Rosmalinda Rosmalinda, 'Digital Fraud Through Phishing Links', *Journal of Legal Dialectics* 6, no. 2 (2024): 92–107.

A crime is basically an act that is prohibited by law and is punishable by criminal sanctions for those who violate it.²One common form of crime is fraud, an act committed with the intention of unlawfully benefiting oneself or another person through deception or a series of lies. The provisions concerning fraud are regulated in Article 378 of the Criminal Code, which serves as the basis for assessing whether the elements of this crime have been fulfilled.

Legally, the crime of fraud is regulated in Article 378 of the Criminal Code, which emphasizes the existence of an element of an unlawful act with the intention of benefiting oneself or another person through trickery or a series of lies.³This provision serves as the primary basis for assessing whether an act can be classified as fraud. However, this general norm is confronted with evolving social realities, where fraud methods are no longer simple and often exploit gaps in social interactions and technology.

On the other hand, the criminal justice system places judges as central actors in assessing, qualifying, and rendering decisions on a case. In carrying out this function, judges are guided not only by normative provisions but also by considering the facts revealed in court, the evidence, and the values of justice that exist within society.⁴This shows that the application of criminal law is not merely mechanical, but also involves a complex legal reasoning process.

The increasingly varied modes of fraud, both conventional and technological, indicate that criminal law faces the challenge of remaining relevant and responsive. In this context, there is a need to reassess the extent to which existing legal instruments are able to accommodate these developments, not only at the normative level but also in their practical application. Thus, this dynamic provides impetus for strengthening, adjusting, and even potentially reforming the criminal legal system to ensure it remains capable of addressing the complexity of emerging societal issues.

On the other hand, arisan (social gathering) is a social activity based on a group's agreement to periodically pool money or goods, which are then distributed to members in turn. Arisan is fundamentally based on trust, but in practice, it can be misused as a means of fraud.

The ever-evolving phenomenon of fraud in society presents an interesting dynamic to study, particularly when linked to the differences in *modus operandi* used by perpetrators. In practice, fraud no longer follows a uniform pattern but undergoes transformations along with changes in social interactions. This is reflected in Decision Number 110/Pid.B/2021/PN Kph.

²Andi Muhammad Sofyan et al., *Indonesian Criminal Law*, Jakarta: Prenada Media, 2023. Page 23

³Alwan Hadiyanto and Haris Budiman, 'Criminal Acts of Fraud According to the Criminal Code and Islamic Sharia', Jakarta: Damara Press, 2023. P. 58

⁴Rizki Dwi Prasetyo, 'Criminal Accountability of Perpetrators of Online Fraud Crimes in Positive Criminal Law in Indonesia' (PhD Thesis, Brawijaya University, 2021).

In Decision Number 110/Pid.B/2021/PN Kph, the case arose from a social gathering (arisan) activity that initially appeared to be a common social activity. However, during its implementation, there were indications that the mechanism was not fully in accordance with the initial agreement. The scheme offered to participants contained certain promises that ultimately went unfulfilled, resulting in losses. Interestingly, the interaction between the perpetrator and the victim was no longer direct, but rather through electronic communication, which on the one hand facilitated access but on the other hand opened up the opportunity for broader information manipulation.

In Decision Number 110/Pid.B/2021/PN Kph, *das sein* is evident from the fact that the arisan activities were carried out using mechanisms that deviated from the initial agreement, with the perpetrators making promises that were not fulfilled, resulting in losses for the participants. The interaction conducted through electronic media also opened up opportunities for information manipulation and the dissemination of false information.

Das sollen (the principle of right) indicates that, normatively, arisan activities must be carried out in good faith, honesty, and in accordance with the agreement. Acts involving deception and causing harm to others can be classified as fraud under Article 378 of the Criminal Code. The difference between *das sein* and *das sollen* in this case indicates a deviation from legal norms, which is the basis for the judge to consider the act a criminal offense.

There has been previous research discussing online arisan fraud. To maintain the authenticity of this paper, the author includes two relevant previous studies:

1. Research conducted by Dimas Wahyudi et al. (2022) examined the legal consequences for perpetrators of fraud through online social media platforms. The study explained that online social media fraud is generally driven by economic factors, technological convenience, and low digital literacy. Law enforcement against perpetrators still relies on Article 378 of the Criminal Code, although there are no specific regulations regarding online social media fraud. Furthermore, the effectiveness of law enforcement is considered suboptimal, necessitating strengthening regulations, an active role for law enforcement officials, and public education. The difference with this study lies in its more specific focus, namely not only discussing the legal consequences and causal factors in general, but also in-depth analysis of the judge's considerations in a concrete decision, namely Decision Number 110/Pid.B/2021/PN Kph, and assessing the implementation of criminal law regulations based on actual judicial practice.
2. Research conducted by Erlin Kusnia Dewi et al. (2021) discusses the legal consequences of implementing online arisan based on Law Number 19 of 2016 concerning ITE. This research shows that there is legal protection for parties who are harmed in online arisan, specifically through Article 28 paragraph (1) of the ITE Law. However, regulations regarding online fraud are still not specific, resulting in weaknesses in the application of criminal sanctions against

perpetrators. Therefore, regulatory clarity and public caution are needed in conducting online arisan transactions. The difference with this research lies in the approach used, namely examining the implementation of criminal law regulations in court decisions and assessing all judges' considerations from the aspects of legal certainty, justice, and expediency, especially in the context of sentencing perpetrators in decision number 110/Pid.B/2021/PN Kph.

METHOD

This research is a normative legal research (normative juridical), namely research that focuses on the study of legal materials as the main basis for examining the norms that apply in a legal event.⁵ The research focus is directed at analyzing the crime of fraud using the online arisan method through a review of Decision Number 110/Pid.B/2021/PN Kph as the main object.

The approaches used include the statute approach and the case approach.⁶ The legislative approach is carried out by examining various legal provisions governing the crime of fraud, particularly in the Criminal Code and the Code of Judicial Procedure. The case approach is carried out by examining court decisions, namely Decision Number 110/Pid.B/2021/PN Kph, to understand the judge's considerations in applying criminal provisions to online arisan fraud cases.

The data sources in this study include primary, secondary, and tertiary legal materials. The primary legal materials consist of court decisions, namely Decision Number 110/Pid.B/2021/PN Kph, as well as relevant laws and regulations, such as the Criminal Code and the Criminal Procedure Code. Secondary legal materials were obtained from legal literature, scientific journals, and previous research related to fraud and online arisan (social savings). Meanwhile, tertiary legal materials come from legal dictionaries and encyclopedias, which help clarify the legal terms and concepts used.⁷

Data analysis was conducted qualitatively, namely by describing and interpreting legal materials to gain a deeper understanding of the issues studied. The analysis process was carried out by linking applicable legal provisions with legal facts in the decision, thus demonstrating the correspondence between norms and their application practices. Conclusions were drawn using a deductive method, namely by drawing conclusions from general provisions to concrete cases contained in Decision Number 110/Pid.B/2021/PN Kph, thus obtaining answers to the research problems.

⁵Zainuddin Ali, *Legal Research Methods*, Jakarta: Sinar Grafika, 2021. Page 32

⁶Budi Juliardi et al., *Legal Research Methods*, Yogyakarta: CV. Gita Lentera, 2023. P. 86

⁷Muhammad Hendri Yanova et al., 'Legal Research Methods: Analysis of Legal Problems Using Normative and Empirical Research Methods', *Badamai Law Journal* 8, no. 2 (2023): 394–408.

RESULTS AND DISCUSSION

The judge's considerations in applying criminal provisions to the crime of fraud using the online arisan method in Decision Number 110/Pid.B/2021/PN Kph

The case in Decision Number 110/Pid.B/2021/PN Kph involves defendant Ayu Amelia, also known as Ayu Binti Maulana, who organized an online arisan (social gathering) through social media, offering a profit of approximately 30% within 10 days. To convince participants, the defendant presented proof of asset ownership and provided examples of initial profit payments, thereby engendering trust among the victims.

The victims in this case include Gilang Ade Pratama, Jefri, and AS Sami Waliyyu alias Liyyu Binti Akasa, who suffered losses of Rp47,800,000.00, Rp6,720,000.00, and Rp5,600,000.00, respectively. Overall, the number of arisan participants reached around 100 people with a total loss estimated at around Rp500,000,000.00. Problems arose when the defendant was no longer able to return the funds or provide profits, and it was discovered that the funds were transferred to another party named Nova without the participants' knowledge.

The Public Prosecutor charged the defendant with alternative charges, namely Article 372 of the Criminal Code and Article 378 of the Criminal Code. However, the Panel of Judges placed greater emphasis on Article 378 of the Criminal Code because it was deemed consistent with the facts revealed. The elements assessed included the intent to unlawfully benefit oneself, the use of deception or a series of lies, and the act of persuading others to hand over money.

Based on the testimony of witnesses, the defendant, and evidence in the form of transfers, transaction summaries, and electronic conversations, the Panel of Judges concluded that the defendant had indeed offered a rotating savings and credit scheme with promises of profits, accepted funds from the victims, and failed to fulfill his obligation to return the funds. Therefore, the defendant's actions were deemed legally and convincingly proven to constitute a criminal act of fraud in accordance with Article 378 of the Criminal Code.

In assessing whether the crime of fraud, as charged under Article 378 of the Criminal Code, was fulfilled, the Panel of Judges, in Decision Number 110/Pid.B/2021/PN Kph, systematically examined each element of the crime based on the facts revealed at trial. This assessment is crucial because a conviction can only be imposed if all elements of the crime are legally and convincingly proven.

Regarding the element of "whoever," the Panel of Judges considered that this element refers to the legal subject as the perpetrator of the crime. In this case, the identity of the defendant, Ayu Amelia alias Ayu Binti Maulana, was clearly proven through identity examination at trial, and there was no objection from the defendant or her legal counsel. Therefore, this element was deemed fulfilled because the defendant was a legal subject capable of being responsible for her actions.

Furthermore, regarding the element of "with the intent to unlawfully benefit oneself or others," the Panel of Judges considered that the defendant actively offered online arisan with the lure of a 30% profit in a short time, which was rationally difficult to realize in a reasonable manner. The fact that the defendant continued to accept funds from participants despite knowing their inability to fulfill their payment obligations indicates a desire to obtain unlawful profits. Furthermore, the transfer of funds to another party without the participants' consent strengthens the intention to unlawfully control the funds. Therefore, this element is deemed to have been fulfilled.

Regarding the element of "using deception or a series of lies," the Panel of Judges concluded that the defendant's actions in presenting proof of asset ownership and providing examples of successful payments in the initial stages were part of a strategy to gain the victims' trust. These actions did not stand alone, but rather formed a series of actions that collectively created the perception that the arisan offered was legitimate and profitable. However, in reality, the defendant lacked the capacity to sustain the scheme. Therefore, the Panel of Judges concluded that a series of lies met this element.

Furthermore, regarding the element of "inducing others to hand over something to him," the Panel of Judges determined that as a result of the series of lies, the victims voluntarily handed over a sum of money to the defendant. This handover did not occur by chance, but rather as a direct result of the defendant's actions in building trust through promises of profit and the evidence presented. The fact that the victims transferred funds to the defendant is concrete evidence that this element has been met.

Based on these considerations, the Panel of Judges concluded that all elements of Article 378 of the Criminal Code had been legally and convincingly fulfilled. Therefore, the defendant's actions were classified as fraud, and he could be held criminally responsible for his actions.

In the *a quo* case, the Panel of Judges assessed the evidence by referring to Article 184 of the Criminal Procedure Code, namely witness statements, the defendant's statement, and written evidence and instructions. The witnesses' statements were consistent in explaining the transfer of money and promises of profits from the defendant, while the defendant's confession regarding the receipt of funds strengthened the evidence. Electronic evidence in the form of conversations and bank transfers was considered valid written evidence and instructions, and had evidentiary force because it directly showed the existence of fraudulent communication and the flow of funds. All of this evidence was relevant to the elements of fraud, especially the existence of deception, the transfer of money, and the victim's losses, so it was declared sufficient to prove the defendant's guilt.

In its legal considerations, the judge stated that all elements of Article 378 of the Criminal Code were met and there was no justification or excuse. Non-legally, the aggravating factors were that the defendant's actions harmed multiple victims and were repeated, while mitigating factors were that the defendant admitted the actions, was polite, and had no prior convictions.

The panel of judges then applied Article 378 of the Criminal Code in accordance with the proven charges and classified the act as fraud committed through electronic media. In the

verdict, the defendant was found guilty and sentenced to two years in prison, based on the fulfillment of the elements of the crime and considering the balance between legal certainty, justice, and expediency.

According to the author, the judge's considerations in this case were generally consistent with criminal law theory, particularly in terms of proving the elements of the crime and applying Article 378 of the Criminal Code. The judge correctly linked the trial facts to the elements of fraud and used valid evidence in accordance with the provisions of the Criminal Procedure Code.

However, there are weaknesses in sentencing, which are deemed to not optimally reflect a sense of justice. When linked to the theory of the purpose of punishment (relative/deterrence theory), punishment aims not only to punish the perpetrator but also to provide a deterrent effect for both the perpetrator and the wider community.⁸In this case, the scale of the losses reached hundreds of millions of rupiah and the large number of victims shows that the defendant's actions had a wide social impact.

In addition, if viewed from the theory of proportionality in sentencing, the punishment imposed should be proportional to the level of error and the consequences caused.⁹Taking into account that the defendant committed the act repeatedly, involved many victims, and used a planned method, the prison sentence of 2 (two) years is considered too light.

Therefore, the author is of the opinion that the more appropriate punishment is in accordance with Article 378 of the Criminal Code, namely 4 (four) years in prison, in order to reflect justice, provide a deterrent effect, and serve as a warning to the public against the rise of online arisan-based fraud.

Implementation of Article 378 of the Criminal Code regarding the crime of online arisan fraud in Decision Number 110/Pid.B/2021/PN Kph

The criminal act of fraud in the Criminal Code (KUHP) essentially regulates acts committed by deceiving or tricking others to obtain unlawful benefits. Doctrinally, fraud is understood as an act containing elements of dishonesty through trickery or a series of lies aimed at influencing another person's will to hand over an item, grant a loan, or write off a receivable. Thus, the scope of the crime of fraud is not only limited to the act of directly taking, but also includes all forms of acts that use information manipulation or engineering circumstances to obtain benefits from another party.¹⁰

The provisions regarding the crime of fraud are specifically regulated in Article 378 of the Criminal Code, which states that "anyone who, with the intention of unlawfully benefiting himself or another person, by using a false name or false dignity, by trickery, or a series of

⁸Katrin Valencia Fardha, 'The Development of Criminal Law Theories', *Innovative: Journal of Social Science Research* 3, no. 5 (2023): 3982–91.

⁹Deni Setiawan et al., 'The Principle of Proportionality in the Implementation of Criminal Punishment in Indonesia', *Jimmi: Multidisciplinary Student Scientific Journal* 1, no. 3 (2024): 266–78.

¹⁰MH Suryanto et al., 'No Viral No Justice: The Perspective of Soerjono Soekanto's Theory of Legal Effectiveness', *Widya Yuridika* 7, no. 3 (2024): 513–22.

lies, induces another person to hand over something to him, or to grant a loan or write off a debt, is threatened with a maximum prison sentence of four years for fraud."

From this formulation, it is clear that the essence of fraud lies in the desire to obtain illegitimate gain through misleading means, which then results in loss for another party. This provision serves as the primary basis for assessing and qualifying an act as a crime of fraud in criminal justice practice.

The provisions of Article 378 of the Criminal Code in judicial practice can be seen concretely in Decision Number 110/Pid.B/2021/PN Kph. In this case, the Panel of Judges chose Article 378 of the Criminal Code as the basis for sentencing defendant Ayu Amelia alias Ayu Binti Maulana after assessing that the character of the act committed was more appropriately qualified as fraud rather than embezzlement as the alternative charge of the Public Prosecutor.

In fact, the defendant ran an online arisan (small savings and credit) scheme through social media, offering profits of approximately 30% within a short period of time. He used various methods to convince victims, such as showing proof of asset ownership and providing examples of initial payments. These actions encouraged victims to hand over money to the defendant. However, the defendant ultimately failed to return the funds or provide the promised profits, resulting in significant losses for the participants.

Based on these facts, the Panel of Judges assessed that there were elements of deception and a series of lies at the core of the defendant's actions. This was the main reason the judge placed more emphasis on Article 378 of the Criminal Code, because the element of deception was apparent from the beginning of the interaction between the defendant and the victim, namely when the defendant offered a savings and credit scheme with promises of unrealistic profits and built trust through misleading information. Unlike embezzlement, which generally occurs after legal control has been established, in this case the desire to obtain unlawful profits had emerged from the beginning through manipulative means.

The selection of Article 378 of the Criminal Code as the basis for sentencing in Decision Number 110/Pid.B/2021/PN Kph demonstrates the judge's direct connection between the formulation of the Criminal Code norm and the facts of the trial, particularly regarding the existence of deception that persuaded the victim to hand over the money. This also emphasizes that the implementation of the fraud norm in the Criminal Code remains relevant to address modern criminal modes, including those committed through electronic media such as online social gatherings.

In this article, the author analyzes the application of criminal law regulations in Decision Number 110/Pid.B/2021/PN Kph. From a criminal law theory perspective, the Panel of Judges' application of Article 378 of the Criminal Code is essentially in accordance with the basic concept of criminal responsibility, particularly in terms of proving the elements

of guilt (*schuld*) and unlawful acts (*wederrechtelijkheid*).¹¹The judge has logically linked the trial facts with the elements of the crime of fraud, thus showing that the function of criminal law as a means of enforcing norms is functioning as it should.

In terms of qualifying the act, the author believes the judge correctly categorized the defendant's actions as fraud, not embezzlement. This is based on the elements of deception and a series of lies from the beginning of the interaction between the defendant and the victim, which were factors that motivated the victim to hand over the money.¹²Thus, the selection of Article 378 of the Criminal Code reflects the accuracy in assessing the character of the defendant's actions, so that no errors occur in the legal construction used.

However, its implementation still has several strengths and weaknesses. The strength lies in the judge's consistency in systematically applying the Criminal Code norms and their ability to accurately link evidence to the elements of the crime.¹³

This indicates that the normative aspect of law enforcement has been working well. However, weaknesses are evident in the suboptimal utilization of the broader regulatory framework, particularly in addressing technology-based crimes.¹⁴This case clearly involves the use of electronic media as the primary means, but is not linked to the provisions of the Electronic Information and Transactions Law (ITE Law).

The author believes that the use of the Criminal Code alone is not legally wrong, but it does not reflect an adaptive legal approach to the development of modern crime. Integrating the Criminal Code with other regulations, such as the Electronic Information and Transactions Law (UU ITE), should provide a more comprehensive legal framework, both in terms of qualifying acts and imposing sanctions. Therefore, although the implementation of Article 378 of the Criminal Code in this decision is normatively correct, the approach used still tends to be conventional and does not fully accommodate the complexity of crimes committed through electronic media.

CONCLUSION

The judge's considerations in Decision Number 110/Pid.B/2021/PN Kph were legally appropriate, particularly in assessing the evidence and validly and convincingly proving the fulfillment of all elements of Article 378 of the Criminal Code. However, from the perspective of the purpose of punishment and the principle of proportionality, the decision still leaves weaknesses, particularly in the imposition of sanctions that are deemed disproportionate to the level of culpability, the number of victims, and the magnitude of the

¹¹Syarif Saddam Rivanie et al., 'The Development of Theories of the Purpose of Punishment', *Halu Oleo Law Review* 6, no. 2 (2022): 176–88.

¹²Nur Fitryani et al., 'Legal Effectiveness', *Al-Razi: Journal of Science and Society*, no. 18 (2018): 1–16.

¹³Rizki Ridwansyah, 'The Concept of Utilitarianism Theory and Its Application in Practical Law in Indonesia', *Nusantara: Journal of Education, Arts, Sciences and Social Humanities* 2, no. 01 (2024).

¹⁴Timothy Nugroho and Iqram Sulhin, 'Normative Discourse on the Death Penalty in the Review of Counter-Colonial Criminology', *Maleo Law Journal* 7, no. 2 (2023): 166–86.

losses incurred. Therefore, although the decision has fulfilled the aspect of legal certainty, the aspects of justice and deterrence are not optimal, so that a more appropriate punishment in accordance with Article 378, namely 4 (four) years imprisonment, is more appropriate to be in accordance with Article 378, namely 4 (four) years imprisonment, rather than 2 (two) years imprisonment to reflect substantive justice and provide a stronger deterrent effect.

Article 378 of the Criminal Code in Decision Number 110/Pid.B/2021/PN Kph has essentially been implemented well, particularly in terms of proving the elements of the offense and qualifying the act as a criminal act of fraud. The Panel of Judges correctly applied the elements of fraud, ranging from the intention to unlawfully benefit oneself, the use of deception, to the act of persuading the victim to hand over money, by linking them to the facts of the trial. However, this implementation is not yet fully optimal, as there are still aspects that need to be improved, especially in the approach to the nature of electronic-based crimes. The use of Article 378 of the Criminal Code alone is not wrong, but it does not reflect a comprehensive application of the law, considering that other provisions, such as the ITE Law, that are relevant to the modus operandi used, are not taken into account. Therefore, although the implementation of Article 378 of the Criminal Code has been fulfilled normatively, strengthening the aspect of regulatory integration and adjustments to developments in modern crime is needed to make the application of criminal law more effective and adaptive.

BIBLIOGRAPHY

A. Book

Ali, Zainuddin. Legal Research Methods. Jakarta, Sinar Grafika, 2021.

Hadiyanto, Alwan, and Haris Budiman. 'Criminal Acts of Fraud According to the Criminal Code and Islamic Sharia'. Jakarta, Damara Press, 2023.

Juliardi, Budi, Yoan Barbara Runtunuwu, Mohammad Hendy Musthofa, et al. Legal Research Methods. Yogyakarta, CV. Gita Lentera, 2023.

Sofyan, Andi Muhammad, Nur Azisa. Indonesian Criminal Law. Jakarta, Prenada Media, 2023.

B. Legislation

Criminal Code

Criminal Procedure Code

C. Journal

Fardha, Katrin Valencia. 'The Development of Criminal Law Theories'. *Innovative: Journal of Social Science Research* 3, no. 5 (2023): 3982–91.

Fitryani, Nur, Siregar, Lecturer, Permanent College, Islamic Religion, and Barumun Raya. 'The Effectiveness of Law'. *Al-Razi: Journal of Science and Society*, no. 18 (2018): 1–16.

Nugroho, Timothy, and Iqrak Sulhin. 'Normative Discourse on the Death Penalty in A Review of Counter-Colonial Criminology'. *Maleo Law Journal* 7, no. 2 (2023): 166–86.

Ridwansyah, Rizki. 'The Concept of Utilitarianism Theory and Its Application in Practical Law in Indonesia'. *Nusantara: Journal of Education, Arts, Sciences and Social Humanities* 2, no. 01 (2024).
<http://journal.forikami.com/index.php/nusantara/article/view/570>.

Rivanie, Syarif Saddam, Syamsuddin Muchtar, Audyna Mayasari Muin, AM Djaelani Prasetya, and Ali Rizky. 'The Development of Theories of the Purpose of Punishment'. *Halu Oleo Law Review* 6, no. 2 (2022): 176–88.

Sahfitri, Afifah, and Rosmalinda Rosmalinda. 'Digital Fraud Through Phishing Links'. *Journal of Legal Dialectics* 6, no. 2 (2024): 92–107.

Setiawan, Deni, Awan Maulidin Juna, M. Surya Fadillah, et al. 'The Principle of Proportionality in the Implementation of Criminal Punishment in Indonesia'. *Jimmi: Multidisciplinary Student Scientific Journal* 1, no. 3 (2024): 266–78.

Suryanto, MH, FT Arresti, and A. Makky. 'No Viral No Justice: The Perspective of Soerjono Soekanto's Theory of Legal Effectiveness'. *Widya Yuridika* 7, no. 3 (2024): 513–22.

Yanova, Muhammad Hendri, Parman Komarudin, and Hendra Hadi. 'Legal Research Methods: Analysis of Legal Problems Using Normative and Empirical Research Methods'. *Badamai Law Journal* 8, no. 2 (2023): 394–408.

D. Other Sources

Prasetyo, Rizki Dwi. "Criminal Accountability of Perpetrators of Online Fraud in Positive Criminal Law in Indonesia." PhD Thesis, Brawijaya University, 2021.