

Request for Derivation of Investigation Report of Suspect by Legal Counsel during Investigation Stage

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Abstract

The purpose of this research is to know, analyze and clarify the rights of the suspect, especially in Article 72 of the Criminal Procedure Code regarding the right of the suspect or his legal counsel to obtain a derivative of the minutes of the examination, a derivative of the minutes of the examination according to Article 72 of the Criminal Procedure Code which is for the purpose of defending the suspect. It is very necessary to confirm the rights of the suspect in Article 72 of the Criminal Procedure Code, namely in terms of submitting a derivative of the minutes of the examination. This research employs a normative legal research method. Using both a statutory and conceptual approach. Basically, the derivative of the minutes of examination is useful for the defense of the suspect. It is hoped that for the future draft of the Criminal Procedure Code, especially Article 72 of the Criminal Procedure Code regarding the right of the suspect or his legal counsel to obtain a derivative of the minutes of the examination, the formulators will add the word mandatory considering the importance of the derivative of the minutes of the examination in a legal system that adheres to the principle of Accusatoir. Article 72 of the Criminal Procedure Code requires sanctions if the article is not implemented in the investigation; hence, the immediacy of the derivative of the minutes is critical in ensuring the suspect's legal rights.

Keywords: Derivation of investigation report, investigation, legal council, right of suspect.



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Introduction

The Indonesian justice system, which follows the principle of Accusator, is inextricably linked to impartial justice, recognizing the suspect as an individual deserving humane treatment; thus, it is imperative that the suspect's rights, as outlined in the criminal procedure code, are upheld¹. A suspect possesses the same legal status as an embodiment of inherent human rights from birth to death. A defendant has not been deemed guilty prior to the judge's verdict. Administratively, in the criminal justice system, an inquiry is conducted when there is a report or complaint of alleged criminal activity. Furthermore, it is common knowledge that an occurrence suspected of being a criminal crime stems from police discoveries or the formation of a criminal inquiry.² The Police institution is responsible for the investigation and inquiry procedure. If the investigator has completed the investigation and inquiry, the findings are documented in the Examination Report (BAP).³

A suspect possesses the right to self-defense to ensure the protection of their human rights. In instances of alleged criminal offenses, the suspect is obligated to furnish information to the investigator, who is the designated authority responsible for elucidating the illegal act. All information pertaining to the suspect is documented in the minutes, which are signed by both the investigator and the suspect who provided the information⁴. If they have consented to this matter, it is governed by Article 118, paragraph 1 of the Criminal Procedure Code. This is directly linked to Article 72 of the Criminal Procedure Code, which stipulates that upon the request of the suspect or their legal representative, in this instance the legal counsel of the official involved, the minutes of the examination will be provided for the purpose of their defense⁵. This refers to law enforcement in Indonesia, which follows the notion of accusator, meaning a suspect is considered a subject rather than an object. In this instance, it is anticipated that a system of checks and balances is implemented within the criminal justice framework, specifically the supervisory role among the parties involved, which is essential for ensuring a proper legal process in a criminal justice system that upholds the accusatorial principle⁶.

The objective of a legal system is to ensure justice is impartially administered between the parties, without bias, while adhering to the relevant laws. This case centers on the rights of the suspect as outlined in Article 72 of the Criminal Procedure Code, which stipulates that a suspect or their legal counsel must submit a request to obtain a derivative of the investigation report. Notably, the article lacks the term "mandatory," despite the presence of 65 mandatory terms in the Criminal Procedure Code, most of which pertain to the investigation phase. Article 72 of the Criminal Procedure Code removes the term mandatory, which will affect instances of abuse of

¹ Muhammad Fikri Aufa, *Berkenalan Dengan Ilmu Hukum* (Bantul: Jejak Pustaka, 2022), 15.

² Riki Afrizal, "Penguatan Sistem Peradilan Pidana Melalui Kewajiban Penyampaian Surat Pemberitahuan Dimulainya Penyidikan," *Jurnal Yudisial* 13, no. 3 (2021): 408, <https://doi.org/10.29123/jy.v13i3.386>.

³ Fitri Aryanti Anggori, Reny Rebeka Masu, and A Resopijani, "Pengembalian Berita Acara Pemeriksaan (BAP) Kasus Pembunuhan Astrid Manafe Dan Lael Maccabe Dalam Tahap Prapenuntutan Di Kepolisian Negara Republik Indonesia Daerah Nusa Tenggara Timur," *Jurnal Ilmu Hukum Dan Tata Negara* 2, no. 2 (2024): 130, <https://doi.org/10.55606/birokrasi.v2i2.1178>.

⁴ Muhammad Fikri Aufa et al., "Legal Analysis on Civil Liability for Individuals Involved in the Indiscriminate Disposal of Medical Waste," *Strata Law Review* 2, no. 1 (2024): 16, <https://doi.org/10.59631/slr.v2i1.154>.

⁵ M. Yahya Harahap, *Pembahasan Permasalahan Dan Penerapan KUHAP* (Jakarta: Sinar Grafika, 2009), 331.

⁶ Damos Christian Aritonang et al., "Penyelidikan Dan Penyidikan Menggunakan Teknik Interogasi Rekaman Audio Visual Dalam Pemberkasan Perkara Tindak Pidana Pada Polrestabes Medan," *Res Nullius Law Journal* 4, no. 1 (2022): 3, <https://doi.org/10.34010/rnlj.v4i1.3864>.

authority by officials if the investigator declines to submit the examination minutes. Moreover, it will indirectly influence the defendant's inadequate self-defense. In the murder case of Mirna, who succumbed to cyanide poisoning in her Vietnamese coffee, the investigators failed to supply the needed derivatives of the examination minutes to the defense counsel. The culprit in this case was Jessica Kumala Wongso, who was the victim's acquaintance.

In this instance, Jessica's attorney, led by Otto Hasibuan, requested a copy of the examination minutes, which the investigator did not provide. This is, of course, in direct opposition to Article 72 of the Criminal Procedure Code, which stipulates that the derivative of the examination minutes is provided only upon request by the suspect or the suspect's legal representative advocating for the suspect's rights. Nevertheless, the article omits the term "mandatory," and there are no penalties stipulated for the investigator's failure to furnish a derivative of the investigation report. This is particularly regrettable for a nation that upholds the accusatorial system, which recognizes the suspect's standing under the law (Equality before the law). To protect justice, it is anticipated that equality before the law would be promoted today, ensuring that all parties experience equitable and unbiased justice. This research aims to determine and assess the suspect's entitlement to obtain a derivative of the investigation report from the investigator during the investigative procedure.

METHOD

The author employs the Normative Juridical analysis method in elucidating the problem formulation presented in the introduction. Normative legal analysis is a legal examination that positions the law as a framework for ethical construction. The term ethical structure refers to the principles, ethics, rules derived from statutory provisions, judicial rulings, agreements, and doctrines (guidance).⁷ This analysis employs primary legal materials, specifically relevant legislation, and secondary legal materials that support the examination of primary sources through the review of books, journals, and literature pertinent to the research conducted. This paper employs the normative legal analysis method, utilizing qualitative descriptive methodologies for research. The author uses both qualitative description approaches and a statutory and analytical approach.⁸

RESULT AND DISCUSSION

Suspects Have the Right to Obtain Derivatives of the Investigator's Investigation Report (BAP)

In a law enforcement system that upholds the notion of "Accusatoir," the suspect is regarded as an individual possessing equal rights under the law (Equality Before the Law),⁹ fundamentally grounded in humanitarian principles. The Criminal Procedure Code addresses the rights of suspects in Chapter VI concerning suspects and defendants. The rights of the suspect in the Criminal Procedure Code reflect the application of a judicial system that recognizes the suspect

⁷ Yulianto Achmad Mukti Fajar ND, *Dualisme Penelitian Hukum Normatif & Empiris* (Yogyakarta: Pustaka Pelajar, 2010): 240.

⁸ Ibid.

⁹ Ikbal Ikbal and Gabriella Almasari Datuan, "Right To Legal Assistance For Communities Unable To Obtain Justice According To Human Rights Perspective," *Lampung Journal of International Law* 5, no. 2 (December 13, 2023): 101–12, <https://doi.org/10.25041/lajil.v5i2.3258>.

as a legal entity entitled to equal rights under the law.¹⁰ Initially, there was great promise in the notion of criminal procedural law, which said that the primary goal and task of criminal procedural law was to find the truth. Finding the truth behind every occurrence caused by human conduct is sometimes simple, but it is not always easy from a legal standpoint.¹¹

In reference to this matter concerning the rights of the suspect, the Criminal Procedure Code explicitly delineates the rights of the suspect and the scope of these rights, thereby fostering a legal system that adheres to the principle of equality before the law, which is essential for the establishment and maintenance of a just system as a manifestation of human rights within the Unitary State of the Republic of Indonesia. The Examination Report (BAP) records the outcomes of a verbal examination of a criminal case, including witness and suspect statements. According to the Criminal Procedure Code (KUHP), Article 1 number 27, witness statements are evidence in criminal cases. These statements are made by witnesses who witnessed or experienced a criminal event and explain their knowledge.

According to Article 14, a suspect is someone who, based on preliminary facts and conduct, is reasonably suspected of committing a crime.¹² Suspects must be aware of their rights during the investigation process, which can lead to arbitrary actions by investigators. As a result, investigators are required to provide detailed information about the suspect's rights, particularly the right to obtain legal assistance, provide information freely and without pressure, and others.¹³ Article 75, paragraph (2) of the Criminal Procedure Code states that the minutes are prepared by the official in charge of carrying out the action referred to in paragraph (1) and are made under the authority of an oath of office. Article 75 paragraph (3): The minutes are signed not only by the official mentioned in paragraph (2), but also by all parties participated in the action described in paragraph (1).¹⁴ The suspect possesses the fundamental right to be informed of the charges against him and the reasons for his arrest, which is essential for his defense. The right to express defense is governed by the Criminal Procedure Code, particularly in Article 72, which stipulates that, in the context of an examination report, the suspect or their legal counsel may request a derivative of the report¹⁵. The investigator is then obligated to provide this derivative, thereby clarifying the process. The suspect's entitlement to access the examination minutes is a fundamental right that the investigator, as the authority, must uphold.

¹⁰ Djoko Prakoso, *Alat Bukti Dan Kekuatan Pembuktian Di Dalam Proses Pidana* (Surabaya: Liberty, 1988), 25.

¹¹ Adriyanto S. Kader, "Pemeriksaan Tersangka Oleh Penyidik Berdasarkan Kitab Undang-Undang Hukum Acara Pidana," *Jurnal Ilmu Hukum Legal Opinion* 2, no. 2 (2014): 6.

¹² Ryan Maulana and M. Iqbal, "Penolakan Penandatanganan Berita Acara Pemeriksaan (BAP) Oleh Tersangka Dalam Proses Pemeriksaan (Suatu Penelitian Di Wilayah Hukum Kepolisian Resor Kota Banda Aceh)," *Jurnal Ilmiah Mahasiswa Bidang Hukum Pidana* 3, no. 3 (2019): 590.

¹³ Darman Lumban Raja, Ahmad Fauzi, and Alpi Sahari, "Perlindungan Hak Tersangka Dalam Memberikan Keterangan Secara Bebas Pada Proses Penyidikan Di Kepolisian Sektor Medan Baru," *Legalitas: Jurnal Hukum* 14, no. 2 (2023): 210, <https://doi.org/10.33087/legalitas.v14i2.340>.

¹⁴ Erick Malombeke, Daniel F. Aling, and Roy Ronny Lembong, "Peranan Berita Acara Pemeriksaan Perkara (BAP) Dalam Proses Peradilan Pidana," *Lex Administratum* IX, no. 4 (2021): 143.

¹⁵ Muh Akbar Ismail, Hambali Thalib, and Anggreany Arief, "Efektivitas Penyidikan Terhadap Pelaku Tindak Pidana Ilegal Access," *Journal of Lex Philosophy (JLP)* 5, no. 1 (2024): 146.

Article 72 of the Criminal Procedure Code stipulates that a derivative of the examination minutes is intended for the suspect's defense. The absence of the examination minutes' derivative undermines the suspect's defense, thereby infringing upon the principle of the accuser, who perceives the suspect as possessing equivalent legal standing. The suspect is entitled to receive a copy of the investigation report, as stipulated in Article 72 of the Criminal Procedure Code, which grants the suspect or their legal counsel the right to request this document for the purpose of defense.

Actions of the Suspect if the Investigator Fails to Submit a Derivative of the Investigation Report

One of the rights of suspects is the entitlement to be accompanied by legal counsel.¹⁶ Legal counsel plays a crucial part in maintaining a robust criminal justice system, specifically by executing the supervisory duty.¹⁷ The oversight conducted by legal counsel over investigators is not explicitly delineated in the Criminal Procedure Code; however, such supervision will influence the integrity of the system, specifically the attainment of the "ideal," which encompasses the principles of "Check and Balance." According to the norms examined by the author, the KUHAP facility cannot address the grievances of legal counsel not submitted by their client's BAP. Article 72 of the Criminal Procedure Code stipulates that compliance is obligatory, however it does not specify any punishments.

The situation presents a dilemma when the norms lack sanction, suggesting that they are merely supplementary, without clarity on their primary applications and advantages. Given the description, it is exceedingly challenging to require the KUHAP regime to afford legal counsel, who has not received a suspect's BAP, the opportunity to undertake definitive legal actions, as such a norm is absent. The author contends that the stipulation in Article 72 of the Criminal Procedure Code concerning the provision of derivatives of examination minutes lacks coercive authority and serves merely as an adjunct in a legal framework that prioritizes human rights, wherein every individual is regarded as having equal standing before the law. In this instance, the author contends that the legal measures available to legal counsel are:

1. Reporting to Superiors

If the investigator chooses not to submit a derivative of the investigation report to legal counsel, the initial step, as stated by the author, is to inform the superior, who is the investigator in this context, as they hold the highest authority in the examination process.¹⁸ The legal

¹⁶ Andrzej Sakowicz, "Suspect's Access to a Lawyer at an Early Stage of Criminal Proceedings in View the Case-Law of the European Court of Human Rights," *Revista Brasileira de Direito Processual Penal* 7, no. 3 (October 31, 2021): 1979, <https://doi.org/10.22197/rbdpp.v7i3.565>; Nurani Ajeng Tri Utami et al., "The Effectiveness of Legal Aid Standards for Suspects in the Indonesian Criminal Justice System in Achieving Access to Justice," *Fiat Justisia: Jurnal Ilmu Hukum* 18, no. 2 (July 5, 2024): 95–108, <https://doi.org/10.25041/fiatjustisia.v18no2.3249>.

¹⁷ Zico Junius Fernando et al., "Robot Lawyer in Indonesian Criminal Justice System: Problems and Challenges for Future Law Enforcement," *Lex Scientia Law Review* 7, no. 2 (November 14, 2023): 489–528, <https://doi.org/10.15294/lesrev.v7i2.69423>.

¹⁸ Syarif Arman, Sukmareni Sukmareni, and Syaiful Munandar, "Proses Penyidikan Tindak Pidana Pencurian Pemberatan Anjungan Tunai Mandiri BNI (Studi Kasus Satreskrim Polres Bukittinggi)," *Sumbang 12 Journal* 01, no. 02 (2023): 136.

foundation for the responsibilities of superiors is delineated in Article 7, paragraph (2) of the Regulation of the Chief of the Indonesian National Police (PERKAP) No. 14 of 2011 regarding the duties of superiors. If the superior in question likewise declines to furnish the same excuse or statement as the mandated investigator, the process will go to the subsequent stage.

2. Submit a report to Propam

If the investigator declines to submit a derivative of the examination minutes to legal counsel, the subsequent course of action is to report to the propam section, citing the investigator's refusal. This situation pertains to social ethics, as the investigator's actions hinder law enforcement, which is grounded in the principle of *Accusatoir*, asserting that all individuals hold equal standing before the law. The legal foundation for the code of ethics is delineated in Article 15 Letter (a) of PERKAP No.14 of 2011, which states, "every member of the police is prohibited from refusing or disregarding requests for help, assistance, or reports and complaints from the public that fall within their duties, functions, and authority." Additionally, the responsibilities of propam in upholding the code of ethics are specified in Article 17 paragraph (1) of the Regulation of the Chief of the Republic of Indonesia Police (PERKAP) No.14 of 2011.

If the reporting effort in the propam section does not alter the investigator's determination to withhold a derivative of the investigation report, pursuant to Article 72 of the Criminal Procedure Code. The subsequent endeavor, as stated by the author, is pretrial.

3. Pre-trial Attempt

After the aforementioned efforts' failure, the author endeavors to assess the role of legal counsel in instances where the investigator neglects to furnish the examination minutes, specifically through pretrial measures as delineated by the pretrial authority in accordance with Article 77 of the Criminal Procedure Code, which posits the following:

- a. The validity of the arrest, detention, cessation of inquiry, or cessation of prosecution.
- b. Recompense and/or rehabilitation for an individual whose criminal case is concluded at the investigative or prosecutorial stage.

In conjunction with the Constitutional Court's decision regarding the subject of pretrial:

- a. Identification of suspects.
- b. Conduct a search.
- c. Seizure.

Based on the aforementioned authority, the author contends that to acquire a derivative of the investigation report during the examination phase, the pretrial lacks the jurisdiction to address the investigation at the police level; thus, the pretrial efforts must advance to the subsequent stage, namely the trial process. Based on the analysis of current cases, the author contends that Article 72 of the Criminal Procedure Code, which pertains to the submission of examination minutes, serves merely as an adjunct without explicit penalties for investigators who fail to

provide these minutes to the suspect or their legal counsel. This omission, despite its significance for the defense, will undoubtedly influence the eventual verdict imposed on the suspect.

CONCLUSION

The suspect is entitled to obtain a derivative of the investigation report along with their rights as a suspect. The suspect is seen as possessing equal status and rights under the law (Equality Before the Law). In this instance, if the legal counsel representing the suspect requests the BAP, yet the pertinent investigator refuses to submit it, this situation remains unaddressed in the Criminal Procedure Code, which upholds the "Accusatoir" principle that regards the suspect as a legal entity possessing equal dignity under the law. The legal foundation for the request for the examination minutes (BAP) of the suspect is articulated in Article 72 of the Criminal Procedure Code, which stipulates that a copy of the examination minutes must be provided to the suspect or their legal counsel for the purpose of defense. During the investigative process, a suspect must be accompanied by legal representation.

Legal Counsel plays a crucial part in maintaining a robust criminal justice system through its supervisory duty. The anticipated supervisory duty is to establish an equitable process aligned with societal norms, incorporating components of "Check and Balance." According to the standards examined by the author, namely in Article 72 of the Criminal Procedure Code, there is no provision for the Criminal Procedure Code to address the grievances of legal counsel on the absence of their client's BAP submission. Article 72 of the Criminal Procedure Code stipulates provision without any sanctions explicitly outlined in the article.

REFERENCES

- Afrizal, Riki. "Penguatan Sistem Peradilan Pidana Melalui Kewajiban Penyampaian Surat Pemberitahuan Dimulainya Penyidikan." *Jurnal Yudisial* 13, no. 3 (2021): 391. <https://doi.org/10.29123/jy.v13i3.386>.
- Anggori, Fitri Aryanti, Reny Rebeka Masu, and A Resopijani. "Pengembalian Berita Acara Pemeriksaan (BAP) Kasus Pembunuhan Astrid Manafe Dan Lael Maccabe Dalam Tahap Prapenuntutan Di Kepolisian Negara Republik Indonesia Daerah Nusa Tenggara Timur." *Jurnal Ilmu Hukum Dan Tata Negara* 2, no. 2 (2024): 129-45. <https://doi.org/10.55606/birokrasi.v2i2.1178>.
- Aritonang, Damos Christian, Syarifudin Kalo, M. Hamdan, and Mahmud Mulyadi. "Penyelidikan Dan Penyidikan Menggunakan Teknik Interogasi Rekaman Audio Visual Dalam Pemberkasan Perkara Tindak Pidana Pada Polrestabes Medan." *Res Nullius Law Journal* 4, no. 1 (2022): 1-31. <https://doi.org/10.34010/rnlj.v4i1.3864>.
- Arman, Syarif, Sukmareni Sukmareni, and Syaiful Munandar. "Proses Penyidikan Tindak Pidana Pencurian Pemberatan Anjungan Tunai Mandiri BNI (Studi Kasus Satreskrim Polres Bukittinggi)." *Sumbang 12 Journal* 01, no. 02 (2023): 131-38.
- Aufa, Muhammad Fikri. *Berkenalan Dengan Ilmu Hukum*. Bantul: Jejak Pustaka, 2022.
- Aufa, Muhammad Fikri, Riana Kesuma Ayu, Ma'rifah Ma'rifah, and Mieke Aprilia Utami. "Legal Analysis on Civil Liability for Individuals Involved in the Indiscriminate Disposal of Medical Waste." *Strata Law Review* 2, no. 1 (2024): 9-19.

<https://doi.org/10.59631/slr.v2i1.154>.

- Fernando, Zico Junius, Kiki Kristanto, Ariesta Wibisono Anditya, Sawitri Yuli Hartati, and Agri Baskara. "Robot Lawyer in Indonesian Criminal Justice System: Problems and Challenges for Future Law Enforcement." *Lex Scientia Law Review* 7, no. 2 (November 14, 2023): 489–528. <https://doi.org/10.15294/lesrev.v7i2.69423>.
- Harahap, M. Yahya. *Pembahasan Permasalahan Dan Penerapan KUHAP*. Jakarta: Sinar Grafika, 2009.
- Ikbal, Ikbal, and Gabriella Almasari Datuan. "Right To Legal Assistance For Communities Unable To Obtain Justice According To Human Rights Perspective." *Lampung Journal of International Law* 5, no. 2 (December 13, 2023): 101–12. <https://doi.org/10.25041/lajil.v5i2.3258>.
- Ismail, Muh Akbar, Hambali Thalib, and Anggreany Arief. "Efektivitas Penyidikan Terhadap Pelaku Tindak Pidana Illegal Access." *Journal of Lex Philosophy (JLP)* 5, no. 1 (2024): 260–75.
- Kader, Adriyanto S. "Pemeriksaan Tersangka Oleh Penyidik Berdasarkan Kitab Undang-Undang Hukum Acara Pidana." *Jurnal Ilmu Hukum Legal Opinion* 2, no. 2 (2014).
- Malombeke, Erick, Daniel F. Aling, and Roy Ronny Lembong. "Peranan Berita Acara Pemeriksaan Perkara (BAP) Dalam Proses Peradilan Pidana." *Lex Administratum* IX, no. 4 (2021): 140–49.
- Maulana, Ryan, and M. Iqbal. "Penolakan Penandatanganan Berita Acara Pemeriksaan (BAP) Oleh Tersangka Dalam Proses Pemeriksaan (Suatu Penelitian Di Wilayah Hukum Kepolisian Resor Kota Banda Aceh)." *Jurnal Ilmiah Mahasiswa Bidang Hukum Pidana* 3, no. 3 (2019): 585–94.
- Mukti Fajar ND, Yulianto Achmad. *Dualisme Penelitian Hukum Normatif & Empiris*. Yogyakarta: Pustaka Pelajar, 2010.
- Prakoso, Djoko. *Alat Bukti Dan Kekuatan Pembuktian Di Dalam Proses Pidana*. Surabaya: Liberty, 1988.
- Raja, Darman Lumban, Ahmad Fauzi, and Alpi Sahari. "Perlindungan Hak Tersangka Dalam Memberikan Keterangan Secara Bebas Pada Proses Penyidikan Di Kepolisian Sektor Medan Baru." *Legalitas: Jurnal Hukum* 14, no. 2 (2023): 208. <https://doi.org/10.33087/legalitas.v14i2.340>.
- Sakowicz, Andrzej. "Suspect's Access to a Lawyer at an Early Stage of Criminal Proceedings in View the Case-Law of the European Court of Human Rights." *Revista Brasileira de Direito Processual Penal* 7, no. 3 (October 31, 2021): 1979. <https://doi.org/10.22197/rbdpp.v7i3.565>.
- Tri Utami, Nurani Ajeng, Dwiki Oktobrian, Enny Dwi Cahyani, Gebi Emada Turnip, and Fadia Rahma Safitri. "The Effectiveness of Legal Aid Standards for Suspects in the Indonesian Criminal Justice System in Achieving Access to Justice." *Fiat Justisia: Jurnal Ilmu Hukum* 18, no. 2 (July 5, 2024): 95–108. <https://doi.org/10.25041/fiatjustisia.v18no2.3249>.