



The urgency of international law in resolving paniai cases to realize just and civilized humanity

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Abstract

Paniai, a serious violation of human rights, occurred because of acts of violence by law enforcement officers against Paniai Papua residents until now has not been resolved by the government. This study provides a solution to the Paniai case based on international law. This research uses library data, while the data source is secondary data, namely data obtained through library materials by collecting from various reading sources related to the problem being studied. This study used a qualitative descriptive analysis. The result showed that international law is used as the basis for rules for resolving cases by countries in dispute, and its implementation must be based on regulations that contain all human rights to protect every human being from crimes.

Keywords: Paniai case, gross human rights violations, international law

Introduction

The Paniai case is included in cases of human rights violations that occurred in Indonesia on December 8, 2014 in Enarotali, Paniai, Papua, where the Paniai case resulted in 4 people being killed and ten people being injured (CNN INDONESIA, 2023). The Paniai case is classified as a serious violation of human rights because the Paniai case fulfills the elements of structured and systematic persecution and murder. Serious violations of human rights are one of the authorities of the Attorney General's Office to follow up on the process of resolving the Paniai case and carry out further investigations to find clear problems with the case of human rights violations, and then proceed to the prosecution stage.

The National Human Rights Commission, as a government agency or institution, has the authority to intervene in handling the Paniai case, stating that the perpetrators of human rights violations in Paniai started from Indonesian National Armed Forces officers, in this case, the involvement of high-ranking TNI officials resulting in a shooting incident during the peaceful demonstration (BBC News Indonesia, 2023).

The Commander of the Indonesian National Armed Forces, who served at that time, said this was completely untrue and that this incident was not expected to happen in the field. The resolution was delegated to the Attorney General's Office with initial evidence provided by the National Human Rights Commission.

The theoretical framework in this discussion is theories related to human rights, including natural rights theory and cultural relativist theory. The natural theory is the rights that are inherent and owned by every person from the moment they are born into the world. Meanwhile, the theory of cultural relativism, namely the absence of universal rights, means that the theory of natural rights ignores the social basis of individuals' identity as human beings.

The next theoretical framework is the Modern Rule of Law Theory, which states that there is a concept of Due Process of Law, namely that everything must be implemented fairly. The actual concept is the concept of fundamental rights and

ordered liberty (Fuady, 2009) [7]. The procedural due process of law is based on the legal concept of "fundamental justice."

Muhammad Syair Fadillah Ridwan, Human Rights Settlement in Paniai, Papua, published in the Research Gate journal in 2002, explained that in resolving the Paniai case, there were inhibiting factors that influenced the resolution of cases of human rights violations in Paniai Papua, namely the lack of communication between National Human Rights Commission and the Attorney General's Office, the institution the authorities do not carry out their duties optimally.

Bambang Sutiyo, Conceptions of Human Rights and Their Implementation in Indonesia, this article was published in the UNISIA journal in 2002; in this article, it is explained that human rights are universal, but the implementation of human rights cannot be generalized between one country and another. Apart from being universal, human rights also have a contextual nature. Enforcement of human rights in Indonesia has been included in the law, as well as the establishment of a Human Rights Court to resolve human rights violations (Sutiyo, 2002) [20].

The problem in this discussion is that international law, in this case, is very necessary or plays an important role to resolve the Paniai case. Still, the Indonesian government has not yet resolved it based on international law. The Indonesian state has ratified international law to serve as national law as a basis for resolving cases of human rights violations, namely Law Number 39 of 1999 concerning Human Rights and Law Number 26 of 2000 concerning Human Rights Courts, but these two regulations are considered incapable of regulates firmly and requires revision or amendment. There should be a need for international law in resolving the Paniai case because the Paniai case is a crime of genocide, which is an international crime and must be tried based on applicable international law and combined with the national law of the country.

The implementation or implementation by the Indonesian government to resolve the Paniai case has not yet found a

bright spot, and the Attorney General's Office always returns the files regarding cases of serious human rights violations in Paniai on the grounds that they have not been able to fulfill the formal and material requirements. The Paniai case, as a severe violation of human rights, falls under the Attorney General's authority to prosecute this case in accordance with the provisions stipulated in the applicable laws and regulations. The president, holding the highest position in this country, must always pay special attention to this case. Authorized law enforcement officials should not ignore cases of human rights violations that have occurred in Paniai Papua because Papua is an area within Indonesian territory.

Research Methods

The research method used is a juridical-normative approach, which examines law from historical and formal legal aspects. This research uses library data, while the data source comes from secondary data, namely data obtained through library materials by collecting from various reading sources related to the problem being studied. The research specification used in this research was descriptive analysis, which only reaches the description level, namely analyzing and presenting facts systematically so that they are easier to understand and conclude.

Types and techniques of data collection using qualitative data analysis techniques: the results of this research will be broken down into sentences that are arranged systematically, clearly, and in detail so that they can be interpreted to obtain deductive conclusions to answer the subject of the approach. There are several types of data analysis techniques, but a qualitative approach will be used in this research. The data in the research will be in the form of verbal words.

Results and Discussion

1. The Urgency of International Law in Resolving the Paniai Case as a Serious Violation of Human Rights

International law, especially that which regulates Human Rights and is commonly referred to as HIHAM, experienced rapid and significant development and itself became a reference for various actors after World War II, such as states, international organizations, nationalities, and individuals when responding to many events regarding human rights violations. Human Rights (HAM) have been used as basic rights or guidelines that the state must own and protect. That is what makes countries in the world make an agreement or treaty in the form of an international agreement aimed at protecting human rights worldwide.

International agreements that have been agreed upon by countries through the United Nations international organization are then used as binding legal documents that force countries to carry out their obligations based on international law. The United Nations is an international organization founded to maintain world order and peace, safeguarding and protecting a person's human rights regardless of the person's origin or, in other words, without discrimination against everyone. So far, the UN has collaborated with countries worldwide to make agreements to protect human rights (Christian, 2019) ^[2].

The UN, in its implementation to protect human rights and maintain world order, especially from serious human rights violations, uses the basis of international law, which has

established 2 (two) international legal instruments, some of them are:

a. Universal Declaration of Human Rights (DUHAM)

The UDHR was ratified on 10 December 1948. The UDHR will strive to teach and provide education to promote respect for these rights and freedoms and, through progressive national and international actions, guarantee their proper recognition and respect. Universal and effective, both by the nations of the member states themselves and by the nations of the territories under their legal authority (UDHR, 2023).

The efforts or attempts made by the UN in handling cases of gross violations of human rights as regulated in the international instruments that have been explained, starting from the UDHR, regulate the most important human rights that must be protected. One of the important issues in the UDHR is the right to life. Every person born into the world is considered to have human rights automatically because these rights are a gift from God Almighty. The UN has included the right to life because it is one of the most essential rights for everyone. This is in accordance with Article 3 of the UDHR, which reads, "Everyone has the right to life, liberty, and safety as an individual.

Countries that still apply the death penalty in the trial of a crime, where the death penalty decision can only be imposed for the most serious crimes in accordance with the law in force at the time the crime was committed, and does not conflict with these provisions and the convention regarding the prevention and punishment of the crime of genocide. The death penalty can only be carried out based on a final decision that an authorized court has handed down. Every person sentenced to death must have the right to request pardon or reduction of the death sentence, which can be given in all cases. The death penalty may not be imposed for crimes committed by anyone under eighteen (18) years of age and may not be imposed on pregnant women.

Based on the rules that the Human Rights Council has implemented through the Civil and Political Rights Covenant, which refers to the UDHR regarding the requirements for carrying out the death penalty, this is clear evidence of the role of the United Nations (UN) which saw that at that time, there were many violations human rights that occurred, so the UN issued the UDHR. Based on this, the UDHR decision issued by the UN is proof that the ratification of the Universal Declaration of Human Rights is a concrete form of the UN's role in providing efforts to protect and enforce human rights. When connected to the Paniai case, the victims have the right to live and defend their lives.

There are ideas, values, and norms in international law, especially those relating to the prevention and punishment of gross violations of human rights, that cannot be avoided, which will significantly influence the development of law and human rights in Indonesia. Various human rights violations that occurred starting from the New Order regime have not been resolved in the history of independent Indonesia. The mass massacre that occurred in 1965 and serious human rights violations in East Timor, Papua, and Aceh have not been resolved yet. The reason is that the Indonesian state and society do not have sufficient experience to resolve cases of serious human rights violations. Apart from that, criminal law and human rights instruments are considered inadequate in handling these cases correctly and fairly.

According to Law Number 26 of 2000 concerning Human Rights Courts, several types of serious human rights violations have been distinguished, namely, crimes of genocide and crimes against humanity. According to the Human Rights Court, it explains that the crime of genocide means "every act committed with the intention of destroying or exterminating all or part of a national, racial, ethnic group, religious group, through various efforts, namely by killing members of the group, resulting in suffering." physical or mental hardship on group members, creating conditions for group life that can result in physical destruction in whole or part (Hakim, Penerapan Hukum Internasional dalam Kasus Pelanggaran Hak Asasi Manusia Berat di Indonesia, 2020) ^[8].

The International Convention strongly opposes acts of torture and other cruel, inhumane, and degrading treatment or punishment, as this has been regulated in international conventions, namely in the UDHR. Until now, the Indonesian government has been trying to resolve the Paniai case by considering the sense of justice and maintaining public order. The Paniai case is considered a serious violation of human rights that occurred in Indonesia, and it is considered that there has been a neglect of the interests of the victim. This is not in accordance with the principles of administering the Indonesian rule of law, where the state must protect all parties, both the interests of members of society suspected of violating the law, let alone members of the community. People who are victims of crimes involving human rights violations.

The fate experienced by victims of these crimes can be compared to experiencing a natural disaster, and the criminal justice system does not care about the fate of people who suffer from natural disasters (Sugiharto, 2006) ^[18]. Victims of serious human rights violations in Indonesia are one of the important victim phenomena that require legal protection. International law increasingly confirms or reinforces the importance of legal accountability for human rights violations, both in the category of serious violations and crimes against humanity (Crime against humanity). Various international human rights legal instruments explicitly state the state's obligation to punish perpetrators of crimes; apart from that, they also emphasize the importance of compensation or rehabilitation for victims of criminal acts of serious human rights violations (Rizki, 2003) ^[15].

The principles that form the basis of these obligations are the only effort to guarantee the protection of human rights. Komnas HAM has maintained the protection of human rights and effective legal protection from violations thereof. The point is that every perpetrator of a cruel crime against human rights must be punished, and the victim must be guaranteed their rights to obtain legal protection (Lawrence, 2000) ^[12]. The Indonesian government already has regulations governing human rights as a result of the ratification of international law, namely the issuance and enactment of Law Number 39 of 1999 concerning Human Rights. Still, with this Law, it is felt that it has not been able to resolve the Paniai case and requires amendments. On the Law based on developments over time (retroactive principle), and the law does not apply retroactively in its application.

b. International Covenant on Civil and Political Rights (ICCPR)

The International Covenant on Civil and Political Rights (ICCPR) was ratified on December 16, 1966, and came into force on March 23, 1976. The International Covenant on Civil and Political Rights (ICCPR) is a universal international legal instrument that contains binding legal obligations for member countries (Temmanengnga, 2022) ^[21]. The UN General Assembly has ratified the International Covenant on Civil and Political Rights (ICCPR) and its Optional Protocol; apart from that, the UN has also ratified the International Covenant on Economic, Social and Cultural Rights (ICESR) and its Optional Protocol. The differentiation between these two human rights themes, which gave birth to the ICCPR, was the result of tough political cooperation between the forces of the Socialist Bloc countries against the forces of the Capitalist Bloc countries that were involved in the Cold War. Currently, the International Covenant on Civil and Political Rights (hereinafter abbreviated as ICCPR) has been ratified by 167 countries. It can be concluded that no less than 95% of the UN member states, totaling 193 countries, have become State Parties to the covenant (Harland, 2018) ^[11].

The country of Indonesia, a country that has many problems in the field of human rights, basically contained several rights content that became material in the ICCPR articles long before the ICCPR itself was ratified. This can be proven from the articles contained in the 1945 Constitution. However, after the proclamation of independence of the Republic of Indonesia, the civil and political rights contained in the 1945 Constitution were unable and/or unwilling to be fully implemented properly by the government. -the governments in power at that time, starting from the regime of President Soekarno to Suharto. As the democratic process continued to grow and move quickly in Indonesia, there was a 'people's rebellion' against President Soeharto's corrupt and authoritarian regime in 1998, which was marked by the birth of a 'new' political atmosphere called the reform order.

The act of violence that occurred in Paniai, Papua, was carried out by law enforcement officers against the residents of Paniai, Papua, which started from a warning and turned into an act of violence and abuse. It can be said that it does not follow human rights theory (HAM). This is because the Indonesian government, in this case, is felt to have violated several human rights principles, namely the principle of equality, the principle of non-discrimination, and the principle of state obligations. The principle of human rights equality means that all people's position is equal and equal. Human rights prohibit any form of discrimination; this prohibition of discriminatory acts is the core of the principle of non-discrimination (Smith, 2008) ^[17]. The ICCPR in the Paniai case as a serious violation of human rights is very much needed in resolving the Paniai case, based on Article 7 Paragraph (1) of the ICCPR, which regulates a person's right to obtain protection from acts of violence. Indonesia has ratified the ICCPR, which was promulgated with the promulgation of Law Number 12 of 2005 concerning the Ratification of the International Covenant on Civil and Political Rights (International *et al.*). This shows that Indonesia is bound by various international obligations that emerged from the existence of the ICCPR. As a Member State, Indonesia must respect, protect, and fulfill human rights within its jurisdiction (Muslimah, 2018) ^[13].

Therefore, Indonesia must immediately resolve the Paniai case, which is considered to be a serious violation of human rights, in order to protect the human rights of the victims of the Paniai case from acts of violence committed by Indonesian law enforcement officers.

Indonesia's actions in carrying out its obligations to respect and guarantee the rights of the Paniai, Papuan people in Indonesia, especially those related to acts of violence. There are several things that must be implemented to fulfill obligations, the first being the obligation to respect the rights of fellow groups. The state's obligation to respect means that the state is not permitted to interfere with the enjoyment of civil and political rights for individuals or groups. In resolving the Paniai case, it is considered that the Indonesian government has not been able to fulfill the state's obligation to respect the rights of fellow groups. It can be proven that the government in resolving it is not very serious and to date the case has not been resolved and has not been able to protect the human rights of the people of Paniai, Papua.

Based on the theory of natural rights (natural rights theory) and cultural relativism (cultural relativist theory) in resolving the Paniai case, the Indonesian government must realize these three theories in its resolution, namely by paying attention to the natural rights of the Papuan people, and not distinguishing between cultures in Indonesia, especially cultures in Papua. With the resolution of the Paniai case based on international law, the author guarantees that the case will be quickly resolved and can protect human rights, especially the Papuan people, due to violence from Indonesian law enforcement officers. Law enforcement officers who carry out acts of violence that cause casualties must be brought to justice firmly and imposed the death penalty because this action has taken away the right to life of the Paniai residents who are victims. and if the death penalty would be commensurate with the actions they have committed.

2. Implementation of the Settlement of the Paniai Case as a Serious Human Rights Violation by the Indonesian Government

Serious violations of human rights in Indonesia have occurred several times. Examples of serious violations of human rights that have occurred in Indonesia include; there was the Talangsari Lampung incident, the Rumoh Geudong and Pos Sattis incidents, the Aceh KKA intersection incident, the Wamena Papua incident, the Paniai Papua incident. Serious human rights violations are regulated in Law Number 26 of 2000 concerning Human Rights Courts, where it is explained that serious human rights violations are human rights violations that fall into the crimes of genocide and crimes against humanity.

Serious human rights violations are included in a type of extraordinary crime called extraordinary crimes. This violation can result in material or material losses, giving rise to feelings of insecurity for both individuals and groups of society (Nugraha, 2017) ^[14]. Therefore, to resolve the problem of serious human rights violations, a special court was formed to resolve various types of serious human rights violations. The aim is to uphold security and peace in Indonesia by maximizing law enforcement related to serious human rights.

There are two classifications for adjudicating cases of serious human rights violations: the first is the Human

Rights Court, and the second is the Ad Hoc Human Rights Court. The difference is that a human rights court is a court that was established to carry out trials for perpetrators who commit serious human rights violations in the future. Meanwhile, the Ad Hoc Human Rights Court aims to try perpetrators who committed serious human rights violations in the past (Fadilah, 2022) ^[6]. The serious human rights violations that occurred in Indonesia, especially in this discussion, namely the Paniai case, which occurred on December 8, 2014, have been attempted to be resolved by the Indonesian government. The resolution began with Komnas HAM forming a Fact Investigation Team (TPF) on January 7 2015.

The results of the investigation carried out by Komnas HAM stated that based on the plenary decision, it was unanimously decided that the human rights violations committed in the Paniai case were serious human rights violations. The chairman of the Komnas HAM ad hoc team stated that the Paniai incident fulfilled the elements of a crime against humanity because there were acts of murder and persecution (HAM, 2023) ^[10]. The implementation of the resolution of the Paniai case by Komnas HAM as the authorized institution, in press statement Number 023/Humas/KH/VI/2020 issued by Komnas HAM, explained that on May 20, 2020, the projusticia investigation files on the Paniai incident were returned. The return of these files is not the first time; previously, Komnas HAM also received files from the Attorney General on March 19, 2020 (HAM, The President's Opportunity to Keep His Promise of Justice in the Paniai Case, 2020).

Files are returned because they do not meet the formal and material requirements. Another step Komnas HAM takes is to continue carrying out investigations into the Paniai case by examining 26 witnesses, carrying out examinations at the crime scene (TKP), examining supporting documents in resolving this case and holding discussions with several experts. There were several important witnesses: the Coordinating Minister for Political, Legal and Security Affairs, several POLRI officers, and security officers on duty in Paniai and Papua. Meanwhile, the TNI, the main source of information about the Paniai case, has ignored or heeded calls from the National Human Rights Commission to provide information.

Apart from that, the National Human Rights Commission has also collected some evidence of forensic testing of firearms regarding weapons use procedures and forensic test procedures. Because it has been determined to be a case of serious human rights violations, the party with the authority to resolve this case is the Agung Prosecutor's Office. This is in accordance with the results obtained by the National Human Rights Commission during the investigation stage. At this stage, the National Human Rights Commission formed a team whose aim was to collect initial evidence that would be used as material for the National Human Rights Commission and then submitted by the Attorney General's investigation team to carry out the investigation.

After the National Human Rights Commission submitted several files on investigation results, on December 3, 2021, the Attorney General's Office issued an investigation warrant (Datik.com, 2020) ^[4]. Based on this letter, an investigative team was formed to investigate cases of alleged serious human rights violations in Pania, Papua. The team consists of 22 senior prosecutors, and their task is to search for and collect further evidence from the Paniai case.

This was done because the evidence previously collected by the National Human Rights Commission was insufficient to substantiate the allegations of serious human rights violations committed so that the perpetrators could be found immediately. With the unresolved cases of serious human rights violations in Indonesia, the principle enshrined in Article 1 paragraph (3) is that Indonesia as a rule of law state is not foreseeable for the people (Santoso, 2019) ^[16]. One of the factors that could hinder the Paniai case resolves that inadequate communication between the National Human Rights Commission and the Attorney General's Office is something that needs to be paid attention to because this creates a lack of harmony in handling cases of serious human rights violations that occurred in Paniai. Therefore, there is a need for communication between the two institutions, as stated in Law No. 26 of 2000 concerning Human Rights Courts (Utomo, 2019) ^[22].

Conclusions and Suggestions

The urgency of international law in regulating the protection of human rights for gross violations of human rights is regulated in several international legal documents in the form of international agreements such as the Universal Declaration of Human Rights (UDHR) and the International Covenant on Civil and Political Rights (ICCPR) which has been explained in the discussion above, which are international legal documents that regulate human rights specifically and provide an understanding of the mechanisms for protecting human rights within the scope of international law in the event of serious human rights violations. In other words, the role of international law is very urgent or important in resolving serious human rights violations, especially in the Paniai Papua case.

The Paniai case that occurred in Indonesia has so far not found any clarity in the resolution carried out by the Indonesian government. For approximately five years, the National Human Rights Commission carried out an investigation process. After repeatedly submitting evidence to the Attorney General's Office, on December 3, 2021, the Attorney General's Office finally issued an investigation warrant. Until now, the process of resolving serious human rights violations in Paniai, Papua, is ongoing. Several factors influence cases of resolving human rights violations in Paniai Papua, namely the lack of communication between Komnas HAM and the Attorney General's Office; the authorized institution does not carry out its main duties optimally. Not only that, there is still a lack of initial evidence from Komnas HAM to submit a case to the Attorney General's Office, there is a special interest in protecting the agency's name, and the government's promises have not yet come to fruition.

The suggestion, according to the author, in resolving the Paniai case is that international laws need to be involved as a basis or guideline in resolving this Paniai case because cases of serious human rights violations are included in international crimes. International law must be involved to resolve the case. The Indonesian government must immediately carry out appropriate actions and not delay the process of resolving the Paniai case to protect human rights, especially the Paniai Papua residents because Papua is still included in the territory of the Indonesian state. Apart from that, without any discrimination in the resolution, the author is confident that the case will be resolved soon and can create justice in the decision handed down.

References

1. BBC News Indonesia. Diambil dari, 2020. <https://www.bbc.com/indonesia/indonesia-51547801>
2. Christian N. Peran pbb dalam perlindungan hak asasi manusia menurut kajian hukum internasional. *Lex Et Societatis*, 2019, 54.
3. CNN Indonesia, 2022. <https://www.cnnindonesia.com/nasional/2022092113053212850711/jejak-kasus-paniai-berdarah-2014-hingga-disidangkan-hari-ini#:~:text=Peristiwa%20Paniai%20berdarah%20terjadi%20pada,ditembak%20oleh%20pasukan%20gabungan%20militer>
4. Detikcom. Maret. Diambil kembali dari, 2020. <https://news.detik.com/berita/d-5839771/kejagung-bentuk-tim-penyidik-pelanggaranham-berat-di-paniai-papua>
5. Duham. (Maret Senin). Deklarasi Universal Hak Asasi, 2023.
6. Fadilah MS. Penyelesaian HAM di Paniai, Papua. *Researchgate*, 2022, 7.
7. Fuady M. Teori Negara Hukum Modern (Rehstaat). Bandung: Refika Aditama, 2009.
8. Hakim A. Penerapan Hukum Internasional dalam Kasus Pelanggaran Hak Asasi Manusia Berat di Indonesia. *Penerapan Hukum Internasional Dalam Kasus Pelanggaran HAM*, 2020, 76.
9. HAM K. Kesempatan Presiden Menepati Janji Keadilan Kasus Paniai. Hal, 2020, 57.
10. HAM K. Diambil kembali dari, 2023. <https://nasional.tempo.co/read/1307953/komnas-ham-tetapkan-kasus-paniaisebagai-pelanggaran-ham-berat/full&view=ok>
11. Harland C. The Status of the International Covenant on Civil and Political Rights (ICCPR) in the Domestic Law of State Parties. *Human Rights Quarterly*, 2018, 187-190.
12. Lawrence LH. Human Right An Agenda for the Next Century. *The American Society of International Law*, 2000, 425-426.
13. Muslimah IR. Kewajiban Indonesia Menurut Internasional Covenant on Civil and Policial Righths Atas Kekerasan Terhadap Kelompok Transgender. *Belli ac Pacis*, 2018, 99.
14. Nugraha X. Akibat Hukum Berlakunya Putusan MK Nomor 18/PUU/V/2007 Terhadap Usulan DPR Dalam Pembentukan Pengadilan HAM Ad Hoc. *Humani (Hukum dan Masyarakat Madani)*, 2017, 57-71.
15. Rizki RM. *Tanggungjawab Negara Atas Pelanggaran HAM Berat Masa Lalu*. Jakarta: Elsam, 2003.
16. Santoso B. Kewenangan Jaksa Agung Dalam Penyelesaian Pelanggaran HAM Berat DIhubungkan Dengan Prinsip Negara Hukum. *Surya Kencana Dua*, 2019, 482-500.
17. Smith R. *Hukum Hak Asasi Manusia*. Yogyakarta: Pusham Uii Yogyakarta, 2008.
18. Sugiharto G. *Perlindungan Hukum Terhadap Korban Pelanggaran HAM Berat Dalam*, 2006.
19. *Sistem Peradilan Agama*. Jakarta: Universitas Islam Indonesia.
20. Sutiyoso B. Konsepsi Hak Asasi Manusia dan Implementasinya di Indonesia. *UNISIA*, 2002, 84-94.
21. Temmanengnga. Implementasi Kovenan Hak Sipil dan Politik di Indonesia. *Direktorat Jenderal HAM*, 2022, 56.

22. Utomo NA. Dekonstruksi Kewenangan Investigatif Dalam Pelanggaran Hak Asasi Manusia Yang Berat. *Jurnal Konstitusi*, 2019, 810-833.