



Determination of children's status as suspects in Commissioning Jarimah Cases

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Abstract

Article 66 of Aceh Qanun Number 6 of 2014 on Jinayat Law, hereinafter referred to as the Jinayat Law, stipulates that if a child under the age of 18 (eighteen) commits or is suspected of committing a Jarimah (offense), the child must undergo an examination in accordance with the regulations on juvenile criminal justice. Therefore, all examination processes for children, both physically and administratively, must comply with Law Number 11 of 2012 on the Juvenile Criminal Justice System, hereinafter referred to as UUSPPA. In the jurisdiction of the Takengon District Court, there was a Jarimah case in 2023 involving a suspect aged 16, who was already married. During the resolution of this case, the examination process did not follow the provisions of Article 66 of the Aceh Qanun Number 6 of 2014, as the child was treated as an adult, and the process did not comply with the laws on juvenile criminal justice, namely Law Number 11 of 2012 on the Juvenile Criminal Justice System (UUSPPA). This study aims to inventory regulations related to the age limit of a child committing a Jarimah, the application of law to children who are married in Jarimah cases, and to explain the legal consequences of court rulings in Jarimah cases involving married children. This is a normative juridical study based on primary legal materials, examining legal theories, concepts, principles, and regulations related to this research. The research findings indicate that the regulation of children who are married as subjects facing the law refers to the principle of *lex specialis derogat legi generali*, meaning that regulations specifically governing children should be applied. In this case, the applicable laws are Law Number 23 of 2002 on Child Protection and Law Number 11 of 2012 on the Juvenile Criminal Justice System, which state that a child is someone under the age of 18, including a child still in the womb, regardless of marital status. There is inconsistency in the application of the law to married children involved in Jarimah cases between the Aceh Qanun of 2014 on Jinayat Law and the Juvenile Criminal Justice System Law, creating legal uncertainty in cases involving children who are married. The Jinayat Qanun, particularly Article 66, does not explicitly discuss how marital status affects the legal treatment of children under 18, leading law enforcement officers to treat married children as adults, although the child's age should remain the primary reference. This practice contradicts the principle of child protection regulated in the Juvenile Criminal Justice System Law, including the right to rehabilitation and the use of restorative justice approaches. The court rulings that treat married children as adults have significant legal and social consequences. Furthermore, this inconsistency in the application of the law creates a bad precedent for similar cases in the future and creates a gap in the judicial system in Aceh. Therefore, legal harmonization between the Jinayat Qanun and the Juvenile Criminal Justice System Law is essential to ensure that child protection is maintained without violating Sharia principles. It is recommended that the Aceh Government harmonize Aceh Qanun Number 6 of 2014 on Jinayat Law and Law Number 11 of 2012 on the Juvenile Criminal Justice System. This harmonization should include clear provisions on the application of the law to children, both married and unmarried, with age remaining the primary reference. Both central and regional governments must ensure consistency in the age limit for children across various laws, including the Jinayat Qanun, the Juvenile Criminal Justice System Law, and other regulations. A child's age should remain capped at 18, regardless of marital status, so that child protection principles can be consistently applied. Marital status should not be the determining factor of legal maturity, as age is the most objective reference in determining a person's capacity for criminal responsibility. The Aceh Government should provide training and enhance understanding among law enforcement officers regarding the implementation of the Jinayat Qanun and the Juvenile Criminal Justice System Law, particularly in cases involving children. Law enforcement officers must understand the importance of using age as the main reference in juvenile criminal justice proceedings and ensure that restorative justice mechanisms are applied.

Keywords: Child, suspect, Jarimah

Introduction

Children are a trust from God that must be protected by all members of society, especially by their families. Children are the next generation of the nation whose rights must be fulfilled, such as the right to life, education, health, and other basic children's rights. In Indonesia's constitution, the second amendment to Article 28I of the 1945 Constitution explicitly states that the right to life, to be free from torture, the right to freedom of thought and conscience, to practice religion, to not be enslaved, to be recognized as a person before the law, and the right not to be prosecuted under retroactive laws are human rights that cannot be reduced under any circumstances. These rights are further detailed in

Law No. 39 of 1999 on Human Rights, which mentions children's rights. Among these rights is the right to affection, attention, and protection from parents, family, society, and the state for their physical and mental growth, as well as personal development.

In certain conditions, a child may commit a criminal act, make a mistake, or violate the law. This situation leads to the child becoming in conflict with the law, meaning they are in a position as a suspect or defendant in a criminal case. Even though their status has changed to that of a suspect or defendant, the child's rights must still be protected by the law itself. A child in conflict with the law must be ensured to receive optimal services and protection from the justice

system and legal process. This means that the existing legal framework should represent the fulfillment of children's rights in general, including the rights of children in conflict with the law. In Indonesia, the legal framework generally places children who commit criminal acts in a different position from adults who commit crimes. The legal protection for children as perpetrators of criminal acts is specifically established in Law No. 23 of 2002 on Child Protection, which was amended by Law No. 35 of 2014 on Amendments to Law No. 23 of 2002 on Child Protection (hereinafter referred to as UUPA). UUPA states that special treatment and specific procedures are applied to a child in conflict with the law. This is clearly stated in Article 64 of UUPA, which asserts that children in conflict with the law must be treated humanely, in accordance with their dignity and rights, with special companion officers, the provision of special facilities and infrastructure, and the imposition of appropriate sanctions in the best interests of the child.

UUPA places that although a child must be treated specially and their human rights fully protected, the law can still be enforced against children who commit crimes. This may be an attempt to balance the fulfillment of human rights with human duties. This means that as long as the rights of others are respected, that individual cannot be punished. Similarly, in the case of minors, they are still considered guilty when legal norms are violated, but the application of the law may be different from that of adults. Article 66 of Aceh Qanun No. 6 of 2014 on Jinayat Law (hereinafter referred to as Qanun Hukum Jinayat) has determined that if a child who has not reached the age of 18 (eighteen) commits or is suspected of committing a Jarimah, then the child shall be examined in accordance with the regulations regarding the juvenile justice system. Thus, all examination processes for children, both physically and administratively, must comply with Law No. 11 of 2012 on the Juvenile Justice System (hereinafter referred to as UUSPPA).

In the jurisdiction of the Takengon District Court, there was a Jarimah case in 2023 where the suspect was 16 years old but already married. During the resolution of the case, the examination was carried out as if the individual was not a child who committed or was suspected of committing Jarimah, and the process did not adhere to the provisions of Article 66 of Aceh Qanun No. 6 of 2014. The child in question was examined without reference to the legal framework on juvenile justice, namely Law No. 11 of 2012 on the Juvenile Justice System (UUSPPA). Based on the above description, it is interesting to examine and research further the "Determination of a Child's Status as a Suspect in a Jarimah Case" to address issues regarding the application of law in Aceh as a Special Autonomous Region.

Method

The research approach used in this paper is normative legal research, which is an approach based on primary legal materials by examining theories, concepts, legal principles, and regulations related to the research. In employing the normative legal research method, the following study will thoroughly examine legal principles, regulations, jurisprudence, and expert opinions, while also viewing the law in a comprehensive manner. This means that law is not only seen as a set of normative rules or what is outlined in the legislation (law in books) but also as the way the law works in practice (law in action).

Discussion

Regulations related to the age of a child

In legal terms, a subject of law refers to an individual or entity that holds rights and obligations, which, in this case, pertains to humans and legal entities. Humans, by default, are recognized as subjects of law, with the same rights inherent in their nature, and this includes children. A child can be considered a subject of law from birth until death. In fact, even while a child is still developing in the womb, they can be regarded as a subject of law in certain circumstances, such as in cases where legal rights or interests require recognition. Therefore, a child is considered a subject of law from conception to adulthood. However, the issue arises in defining the age at which a child is considered an adult under the law, which differs across legal contexts.

a. The Civil Code (Kitab Undang-Undang Hukum Perdata or KUHPerdata)

The definition of a child under the Civil Code primarily concerns the child's civil status and rights, particularly in matters related to inheritance and civil obligations. Article 330 of the Civil Code defines a child as "a person who is not yet an adult, has not reached the age of 21 years, and has not yet married." This is consistent with the definition of a child in Law No. 4 of 1979 on Child Welfare, which also uses 21 years as the age of majority. In civil law, a child even in the womb can be considered a legal subject if there are legal interests or consequences that require such recognition, as stated in Article 2 of the Civil Code. This indicates that the law acknowledges the existence of a child as a legal subject even before birth, in certain cases.

b. The Penal Code (Kitab Undang-Undang Hukum Pidana or KUHP)

In the Penal Code, the age at which a child is considered an adult in criminal law is different. Article 45 of the Penal Code stipulates that a person can be subjected to criminal prosecution if they are at least 16 years old. Therefore, a child below 16 years of age cannot be criminally prosecuted, except in cases involving serious crimes. If a child is involved in a criminal case, the judge may order the child to be returned to their parents, guardian, or the state, with an emphasis on rehabilitation rather than punishment.

c. International Instruments

Several international instruments address the age of a child, particularly concerning the protection of children's rights, including:

1. UN Convention on the Rights of the Child (CRC) - 1989

Article 1 of the CRC defines a child as "every human being below the age of 18 years, unless under the law applicable to the child, majority is attained earlier." This establishes the age of 18 as the global benchmark for defining a child, requiring countries to provide special protection for individuals under this age.

2. ILO Convention No. 138 on Minimum Age for Admission to Employment (1973)

This convention regulates the minimum age for work, specifying that the minimum age for light work should not be below 15 years, with exceptions for developing countries.

3. ILO Convention No. 182 on the Worst Forms of Child Labor (1999)

This convention prohibits children under 18 from engaging in hazardous work that could endanger their health, safety, or morals. These international instruments underscore the global commitment to protecting children and define age limits for various contexts, such as labor, crime, and justice.

d. Law No. 1 of 1974 on Marriage

This law does not explicitly define the age of a child. However, Article 6, paragraph (2) states that individuals under 21 years old must obtain parental consent to marry. Additionally, Article 7, paragraph (1) allows for marriage if the man is at least 19 years old and the woman is at least 16 years old. This implies that a child in this context refers to someone under the legal marriage age, with the age of adulthood set at 16 years for women and 19 years for men.

e. Law No. 39 of 1999 on Human Rights

This law explicitly recognizes children as individuals under the age of 18 and includes those still in the womb. Article 52, paragraph (1) mandates the protection of children's rights by all sectors of society, from the government to parents or guardians. Article 58, paragraph (1) guarantees that children receive protection from all forms of violence, including physical and mental abuse, neglect, and sexual exploitation.

f. Law No. 23 of 2002 on Child Protection

This law, amended by Law No. 17 of 2016, provides legal protection for children. Article 1, number 1 defines a child as anyone under 18 years of age, including those still in the womb. This law prioritizes child protection in areas like life, development, education, and protection from violence and exploitation. A child ceases to be considered a child under this law if they are married.

g. Law No. 11 of 2012 on the Juvenile Justice System

This law offers special protection to children involved in criminal cases. According to Article 1, number 3, a "child in conflict with the law" is defined as anyone aged 12 to 18 years who is suspected of committing a crime. The law emphasizes rehabilitation, not punishment, and promotes restorative justice principles, where the focus is on restoring the situation to its original state rather than punitive measures.

h. Qanun Aceh No. 6 of 2014 on Jinayat Law

Under Article 66 of this Qanun, a child is defined as someone who has not yet reached 18 years of age and is unmarried. If a child commits a violation, the law refers to the Juvenile Justice System Law for handling such cases.

Disharmony in Legislation

From the various legal provisions above, it is clear that there is disharmony in the definition of the age of a child across different laws. Some laws set the age of majority at 16, others at 18, and some even at 21. However, in criminal law, a person is considered a child until they reach the age of 18, regardless of their marital status. In contrast, in civil law, a child who has married may be considered an adult. To resolve this disharmony, the principle of *lex specialis derogat legi generalis* (specific laws override general laws) and *lex posterior derogat legi priori* (later laws override

earlier laws) can be applied. In this context, newer laws such as the Law on Child Protection and the Law on the Juvenile Justice System should take precedence, since these laws specifically define a child as anyone under the age of 18, without regard to marital status.

The principle of legal certainty is essential to ensure that the age limits set in laws are applied consistently, protecting children's rights and avoiding legal uncertainty that could be detrimental to the child involved. In other words, when the law defines a child's age, such as the minimum age for marriage or criminal liability, legal decisions must adhere to these age limits to prevent confusion. This also means that children facing the law should be treated with special protections, focusing on rehabilitation rather than punishment. Thus, legal certainty encourages the creation of a reliable legal system that offers the maximum protection for children's rights. In addressing the disharmony between these legal regulations, *lex specialis derogat legi generalis* should be applied, particularly concerning cases involving children in the criminal justice system, ensuring that the Law on Child Protection and the Law on the Juvenile Justice System which define a child as anyone under 18 take precedence in such matters.

Application of law to a married child in cases of Jarimah in the ruling of the Shari'a Court

The case in Takengon, represented by the Shari'a Court Ruling No. 10/J/2023/MS.Tkn, which involves a child who has married but is processed under the law as an adult in a jarimah (criminal offense) violation, highlights significant challenges in the application of Aceh's Qanun Jinayat Law of 2014. Article 66 of this Qanun states that if a child under 18 years old commits a jarimah, the legal process should follow the Child Justice System Law (Undang-Undang Sistem Peradilan Pidana Anak, SPPA). However, this Qanun does not provide specific clarification regarding the legal status of a married child, leaving room for differing interpretations at the implementation level. In national law, through SPPA, children who violate the law must be treated in a special manner. This approach is based on the principle of restorative justice, which focuses on resolving cases while prioritizing the best interests of the child without harming their future. On the other hand, in Aceh, the application of Qanun Jinayat focuses more on the concept of responsibility based on the status of adulthood (*baligh*). However, this Qanun does not explicitly state that marriage is a factor in altering the legal status of a child to an adult. Article 66 of Qanun Jinayat emphasizes that children under 18 years old must be processed according to SPPA, which offers mechanisms like diversion (out-of-court resolution), psychological counseling, and guidance. This means that any child committing a jarimah, regardless of their marital status, should be treated in accordance with this framework. However, in practice, a married child is often viewed as an adult under religious law, and thus processed according to adult legal procedures.

The inconsistency between Article 66 and its implementation demonstrates a significant problem in legal interpretation. Qanun Jinayat does not state that marriage changes the legal treatment of children. Therefore, normatively, a married child should still be processed under SPPA if under 18. However, in practice, marriage is often considered a reason to treat the child as an adult, especially in Aceh, where the concept of *baligh* in Islamic law is

applied. This view creates potential violations of child rights. Psychologically and emotionally, a child who is married may not have the capacity to fully understand the consequences of their actions, even if they are considered an adult under religious law. By processing a married child as an adult, law enforcement risks ignoring the child protection principles guaranteed by the SPPA and even by Article 66 of Qanun Jinayat itself.

The application of adult legal treatment to a married child has serious consequences. First, the child loses the right to special protection, such as guidance, counseling, or opportunities for rehabilitation. Second, the legal process treated the same as adults tends to be repressive, potentially causing trauma and stigma to the child. Third, a child who should be treated as an individual still developing is instead punished in a manner that overlooks rehabilitation. To address this issue, law enforcement in Aceh must return to the foundational rules in Article 66 of Qanun Jinayat and SPPA. Marital status should not be used as a basis to alter the legal treatment of children under 18. Instead, the child's age, as outlined in SPPA and confirmed by Article 66, should be the guiding principle. Law enforcement must also recognize that Qanun Jinayat itself allows for the differential treatment of children versus adults, without distinguishing marital status.

This situation highlights the need for consistency in applying the law to married children. Article 66 of Qanun Jinayat already stipulates that children under 18 should be processed under SPPA without any mention of exceptions for married children. This case also reflects the lack of clear guidelines for law enforcement in handling married children in jarimah violations. While Islamic law views marriage as an indicator of adulthood, the psychological and emotional factors of the child cannot be ignored. A child who is married may not have the full capacity to understand the consequences of their actions, especially if they are still very young. Thus, the application of the law without considering the social, psychological, and age context could lead to injustice.

This condition underscores the importance of harmonizing national law with Islamic law. The Aceh government needs to develop clear and firm guidelines on how to treat married children involved in jarimah violations. These guidelines should take into account the child protection principles outlined in SPPA while accommodating the Islamic values that serve as the foundation of law in Aceh. A comprehensive and humane approach is needed so that children, even if married, still receive fair treatment in line with their human rights. This case should also serve as a lesson for all parties, including the government, law enforcement, religious scholars, and society, to re-evaluate the judicial system in Aceh, especially concerning children. Concrete steps such as enhancing law enforcement's understanding of child protection, allocating funds for guidance, and strengthening supporting institutions should be undertaken immediately. Children are the future assets that must be protected, regardless of their marital status. An unjust legal process will only damage their future and violate the principles of justice that form the foundation of every legal system. With a more humane and balanced approach, Aceh can set an example of how Shari'a law can coexist with child protection principles without compromising justice and humanity.

A child who is married, although legally considered an adult in the context of marriage, remains vulnerable in facing the legal system, particularly in criminal offenses or jarimah violations. The Mahkamah Syari'ah, which adheres to Islamic legal principles, often considers a child's age and psychosocial background when deciding legal cases, including when they are involved in criminal offenses. In this regard, the theory of legal protection plays a crucial role, requiring the law not to only consider the child's legal status as a married person but also to provide protection against potential physical, emotional, and social harm that can arise from their involvement in jarimah. The application of the law to a married child in the context of jarimah in the Mahkamah Syari'ah must prioritize the best interests of the child as the foundational principle of legal protection theory. Although the child may legally be married, their young age makes them vulnerable to the impacts of a harsh judicial system. Therefore, in the Mahkamah Syari'ah ruling, there should be a balance between applying the law to the jarimah committed and protecting the child's rights, such as their right to education, mental health, and personal development. Applying punishment without considering the child's age and mental capacity in jarimah cases may contradict the principles of legal protection, which should prioritize recovery and rehabilitation. Thus, legal protection theory mandates that every decision made in the case of a married child involved in jarimah must focus on fulfilling their rights as children and minimizing the negative impacts of the law.

Legal consequences of court ruling in Jarimah case committed by a married child

The jarimah case involving a child who is already married raises complex legal issues. One of the main problems is the ambiguity surrounding the legal status of a child who is married but still underage, as outlined in Article 66 of the Aceh Qanun of 2014 on Jinayat Law. This article states that if a child under 18 years old commits a jarimah offense, the legal process must follow the Juvenile Justice System (SPPA) Law. However, this qanun does not explicitly regulate whether the marital status affects the application of the law to such a child. The ruling of the Takengon Sharia Court Number: 10/J/2023/MS.Tkn shows that a married child is treated as an adult in the jarimah legal process. This creates legal inconsistency because Article 66 of the Jinayat Qanun actually provides legal protection for children under 18 years old, regardless of their marital status. As a result, the court's ruling in this case could potentially violate the principle of child protection as outlined in national law.

When a married child is treated like an adult, several significant legal consequences arise. First, the child loses the rights to protections that should be provided under the SPPA. For example, the SPPA prioritizes a restorative justice approach, which aims to restore the child's situation through rehabilitation, not through heavy punishment. Additionally, the SPPA regulates a diversion mechanism, where juvenile cases are resolved outside the courtroom to protect the child's future from social stigma due to criminal proceedings. When this mechanism is ignored, a married child is processed directly in court and sentenced like an adult, so their rights as a child are not fulfilled. The court's ruling that treats a married child like an adult creates psychological and social trauma for the child. Punishments such as whipping or imprisonment, which are often the

consequences of jarimah violations, can leave long-term impacts on the child's psychological condition. A child facing such severe punishments may feel alienated from their social environment, lose their self-esteem, and face stigma that harms their future. In certain cases, physical punishment given to the child may violate the principles of non-discrimination and the best interests of the child as outlined in national and international child protection law. The situation becomes more complicated when the marriage of the child is not officially registered by the state. Under national law, an unregistered marriage is considered legally invalid. Therefore, a child who has married according to religious law but has not officially registered their marriage is still considered a child under the eyes of the state. In this situation, the child should still be processed according to the SPPA, without being influenced by their marital status. However, in practice, law enforcement officers often base their decisions on the child's status of maturity or adulthood according to Islamic law, and treat the child like an adult, even if they are under 18.

The court's ruling that treats a married child like an adult also reflects a weakness in harmonizing the Jinayat Qanun and the SPPA. The Jinayat Qanun does not explicitly regulate how marital status affects the application of Article 66. This creates room for different interpretations among law enforcement officers. Many law enforcement officers in Aceh tend to prioritize the view that marriage signifies maturity, so a married child is considered fully responsible for their actions. However, this view contradicts the SPPA, which firmly states that the child's age is the primary factor in determining the legal treatment. The inconsistency in the application of the law also affects the justice system in Aceh. When the court ignores the provisions of Article 66 and decides the case of a married child using an adult legal approach, it sets a precedent that could harm other children. Moreover, this inconsistency can lead to criticism from the public and child protection agencies, which argue that the justice system in Aceh does not fully respect child protection principles. This ruling also reveals a gap in the Jinayat Qanun regulations. The lack of clear rules regarding the legal treatment of a married child shows that a revision of the qanun is necessary. The revision should include provisions that emphasize the child's age as the primary basis for determining their legal treatment, regardless of their marital status. To address this issue, there needs to be an alignment between the Jinayat Qanun and the SPPA so that the principle of child protection can be applied consistently in Aceh. The Aceh government should also provide training to law enforcement officers to ensure they understand the importance of applying Article 66 in accordance with child protection law principles. Additionally, the public should be encouraged to officially register marriages so that the legal status of married children can be clearly identified, avoiding confusion in the implementation of the law.

Overall, the court's ruling in a jarimah case involving a married child should serve as an important evaluation for the government and law enforcement in Aceh. Children who face the law require special protection, without exception, and legal processes involving them must ensure that their rights are upheld. By harmonizing Islamic law and national law, Aceh can build a fair, consistent judicial system that respects child protection principles. The legal consequences of a court ruling in a case involving a jarimah committed by

a married child can be analyzed through the theory of legal effectiveness, which focuses on how well the law can be applied effectively and achieve the desired impact in society. In this context, if a married child is involved in a jarimah act, the application of punishment imposed by the court must consider the long-term impact on rehabilitation and the reintegration of the individual into society. The theory of legal effectiveness requires that the law not only be enforced formally but also produce positive effects, such as crime prevention, learning for the offender, and protection for society. If the law applied in this case is ineffective in achieving the goals of rehabilitation and child protection, it can be considered a failure in fulfilling its primary function. Additionally, in the theory of legal effectiveness, the application of sanctions to a married child who commits a jarimah must take into account the characteristics of the child as an offender, who is still in a developmental stage psychologically and socially. A court that fails to impose punishment appropriate to the child's age and mental condition could lead to increased potential long-term negative impacts, such as trauma, social exclusion, or even criminal recidivism. Therefore, the effective application of the law in this case not only involves the imposition of punishment but also considers rehabilitation and education efforts that can change the child's behavior, while prioritizing the child's best interests. Thus, the theory of legal effectiveness emphasizes that the justice system must carefully assess the goals of punishment and rehabilitation to ensure that the punishment imposed produces positive effects in line with the objectives of the law itself.

Conclusion

1. The treatment of children who are married as subjects facing the law follows the principle of *lex specialis derogat lex generalis*, which means that specific regulations should apply when dealing with children. In this case, it refers to the Child Protection Law (Law Number 23 of 2002) and the Juvenile Justice System Law (Law Number 11 of 2012). These laws state that a child is defined as someone who is under 18 years old, including those who are still in the womb, regardless of whether they are married or not.
2. There is inconsistency in the legal application regarding married children in jarimah cases between the Aceh Qanun of 2014 on Jinayat Law and the Juvenile Justice System Law (SPPA), which creates legal uncertainty in cases involving married children committing jarimah offenses. The Jinayat Qanun, particularly Article 66, does not explicitly address how marital status affects the legal treatment of children under 18. This results in law enforcement officers tending to treat married children as adults, even though the child's age should remain the primary criterion. This practice contradicts the child protection principles set forth in the SPPA, including the right to rehabilitation and restorative justice approaches.
3. Court decisions that treat married children as adults have significant legal and social consequences. Legally, this decision removes the child's rights to special protection, including access to diversion mechanisms and rehabilitation. Furthermore, the inconsistency in the application of law sets a bad precedent for similar cases in the future and creates gaps in the justice system in

Aceh. Therefore, harmonizing the law between the Jinayat Qanun and the SPPA is crucial to ensure that child protection remains intact while respecting the principles of Sharia law.

References

1. Khairani, "Mekanisme Penanganan Anak Pelanggar Qanun Jinayat Tentang Khalwat Dan Ikhtilath (Studi Kasus Di Kabupaten Aceh Selatan)", *Gender Equality: Internasional Journal of Child and Gender Studies, Jurnal Pusat Studi Gender dan Anak (PSGA) Universitas Islam Negeri Ar-Raniry Banda Aceh*, 2018, 4(1).
2. Munandar, "Kedudukan Anak Sebagai Jinayah Dalam Qanun Aceh Nomor 6 Tahun 2014 Tentang Hukum Jinayat", *Jurnal Syiah Kuala Law Journal*, 2017, 1(1).
3. Nanang Ibrahim Soleh, *et al*, "Analisis Hukum terhadap Anak yang Sudah Kawin sebagai Subyek yang Berhadapan dengan Hukum (Studi Kasus Putusan Pengadilan Negeri Sampit Nomor: 03/Pid.Sus Anak/2015/PN.Spt)", *Journal of Environment and Management*, 1(3), 232-240.
4. Phalita Gatra, "Konsep Hak Asasi Manusia Yang Digunakan Di Indonesia ", 2019. <https://www.hukumonline.com/klinik/detail/ulasan/lt58e0c8234493e/konsep-hak-asasi-manusia-yang-digunakan-di-indonesia/>. Diakses pada 11 Juli 2020 pukul 12.00 WIB.
5. Risky Dian Novita Rahayu Rochim, *Harmonisasi Norma-Norma Dalam Peraturan Perundang-Undangan tentang Kebebasan Hakim*, *Jurnal Ilmiah*, Malang: Universitas Brawijaya, 2014.
6. Sutan Surya Radonna, Dadang Suprijatna, J. Jopie Gilalo, "Pelaksanaan Bantuan Hukum Dalam Perkara Pidana Di Pengadilan Negeri Cibinong ", *Jurnal, Universitas Djuanda, Bogor, Jurnal Hukum De'rechtsstaat*, 2018, 4(1).
7. Tri Jata Ayu Pramesti, "Dasar Hukum Pelaksanaan Pemerintahan di Aceh ", 2015. <https://www.hukumonline.com/klinik/detail/ulasan/lt563a237f66b9e/dasar-hukum-pelaksanaan-pemerintahan-di-aceh/>. Diakses pada 24 Juli 2020 pukul 14.35 WIB.
8. Wahyu Simon Tampubolon, "Upaya Perlindungan Hukum Bagi Konsumen Ditinjau Dari Undang-Undang Perlindungan Konsumen", *Jurnal Ilmiah advokasi*, 2016, 4(1).
9. Zulkarnain Ridwan, "Negara Hukum Indonesia Kebalikan Nachtwachterstaat ", *Jurnal, Universitas Lampung, Lampung, Fiat Justitia: Jurnal Ilmu Hukum* 2012, 5(2).