



## Deconstruction of legal norms regarding the National Police draft from a utilitarian perspective

I Nyoman Agus Saputra Risky

Faculty of Law, Warmadewa University, Denpasar, Indonesia

### Abstract

Draft Law on the National Police of Republic of Indonesia creates new issues relating to excessive authorities of Indonesian Police to conduct interception and law supervision also extensive law enforcement in public cyberspace. In order to analyse Draft Law on Indonesian Police, the utilitarianism theory may be applied, which focuses on the greatest happiness for the greatest number through hedonistic calculus measurement. This research provides legal analysis from the perspectives of legal norms and legal utilities based on hedonistic calculus. This research is conducted by utilising normative law method with statutory and conceptual approaches, actualised through bibliographic method. Article number 14 first paragraph letter O creates an interception issue due to the absence of explicit interception mechanism, and article number 16 first paragraph letter Q potentially restricts public participation, specifically in context of public critics and opinions through cyberspace. Applying the hedonistic calculus to the Draft Law on Indonesian Police produces excessive pleasure for the government and Indonesian Police, while causing disproportionate pain on public side. The enactment of Draft Law on Indonesian Police will create advanced law issues as the article number 14 first paragraph letter O and article number 16 first paragraph letter Q potentially provides room for abuse of power by Indonesian Police and this Draft Law can be used as a political tool by the government to silence public critics and opinions in cyberspace. Hence, it needs advanced legal analysis of Indonesian Police authorities and also the requirement of strict supervision.

**Keywords:** Abuse of power, Indonesian Police, pleasure, pain

### Introduction

The Indonesian National Police (hereinafter referred to as Polri) is a state institution tasked with maintaining public security and order and is tasked with protecting, serving, and enforcing the law. The enactment of the Draft Law on the Indonesian National Police (Polri) has generated various controversies and criticisms within the community, as this draft has the potential to weaken and stifle public criticism.

The Draft Law on the Third Amendment to Law Number 2 of 2002 concerning the Indonesian National Police presents specific problems, particularly regarding the excessive expansion of Polri's authority. Amendments to Article 14 paragraph (1) letter O and Article 16 paragraph (1) letter Q grant police officers broad access to private data from the public without oversight. The absence of *lex specialis* regulations on wiretapping creates legal irregularities in the exercise of Polri's authority as stipulated in Article 14 paragraph (1) letter O. Without proper oversight, these new regulations raise concerns that public privacy will be threatened and the risk of abuse of authority by officers, given the frequent cases of abuse of power associated with police officers.

Based on data from reports from various civil society and state institutions, they consistently reveal massive human rights violations and *ultra vires* by the Indonesian National Police. KontraS reports hundreds of cases of police violence annually, with 651 cases (July 2020-June 2021), 677 cases (July 2021-June 2022), 622 cases (July 2022-June 2023), and 198 cases in the period January-April 2024 alone. This violence includes abuse, torture, arbitrary arrest/detention, forced dispersal, shootings, and extrajudicial killings<sup>[1]</sup>. Meanwhile, YLBHI also recorded 67 victims of extrajudicial killings in 2019 and 130 other cases of violations in July 2022-2023<sup>[2]</sup>. The National Commission on Human Rights (Komnas HAM) has confirmed that the

Indonesian National Police (Polri) is the main human rights violator, placing it as the institution most frequently complained about every year since 2019 (744 cases in 2019, 785 in 2020, 661 in 2021, 861 in 2022, and 771 cases out of a total of 2,753 national complaints in 2023). The Indonesian National Police (Polri) consistently ranks among the institutions most frequently reported to the Indonesian Ombudsman (e.g., 699 reports in 2020, 676 in 2021, 683 in 2022, and hundreds more in the first quarter of 2023) regarding maladministration and abuse of authority. The National Police Commission (KOMPOLNAS) also received 1,150 complaints as of September 2023, covering poor service, abuse of authority, alleged corruption, and improper discretion. Abuse of authority is also evident in violence against journalists (15 attacks in 2022, 28 victims during the 2020 Omnibus Law demonstrations) and corrupt practices, such as indications of fictitious tenders and price markups in the procurement of ammunition/tear gas, as discovered by the Indonesian Corruption Watch (ICW) (2023). All of these issues have resulted in a crisis of public trust, with the LSI (2023) survey ranking the Indonesian National Police (Polri) with the lowest level of trust (64%) among law enforcement agencies and also the least trusted institution (61%) in eradicating corruption<sup>[3]</sup>.

In analyzing a product in law, the use of a utilitarian perspective can be used as a test method. The utilitarian concept emphasizes the calculation of pleasure (pleasure/benefit) and pain (pain/suffering) using a method known as hedonistic calculus<sup>[4]</sup>, which focuses on the quantity of pleasure>pain so as to be able to present a legal framework that is more beneficial to society<sup>[5]</sup>. Hedonistic calculus is composed of seven variables, including intensity (intensity), duration (duration received), certainty (certainty of fulfillment), propinquity (how quickly a pleasure can be obtained), fecundity (the possibility of pleasure/pain being

followed by something similar), purity (pleasure followed by suffering), and extent (how many people get happiness) [6, 7].

Based on all the problems above, researchers have previously conducted related research on the Draft National Police Law. The research conducted by Mahbub Syaltut and colleagues, entitled "The Urgent Legal Politics of Revising the National Police Draft," focuses on examining the National Police Draft from the perspective of legal politics and its urgency, as well as from the perspective of abuse of power by the National Police [8]. In the results of their study, the National Police Draft is an urgent need to improve the performance function of the National Police, considering the very complex tasks of the National Police, and this expansion of authority needs to be monitored because it has the potential to create an authoritarian government. Furthermore, in the study by Alberta Debora and colleagues, entitled "Legal Review of the National Police Draft: Effectiveness of Law Enforcement and the Risk of Abuse of Authority," which examines law enforcement and checks and balances as well as oversight of abuse of power by the National Police. In the results of their study, the revision of the National Police Law has the potential to cause abuse of power by the National Police and disrupt the stability of checks and balances of government power, therefore the need for strict oversight by authorities such as the House of Representatives, the Constitutional Court, and the President [9]. In a recent study by Yaris Adhial and colleagues, entitled "Critical Analysis of the Republic of Indonesia Police in the Implementation of Cybercrime Law in Indonesia," which focused on the enforcement of cybercrime law by the Indonesian National Police (Polri) and the obstacles, particularly the lack of specific regulations regarding law enforcement in private spaces, the study's results indicate the emergence of many forms of cybercrime and the need for a strong revision of the National Police Law [10].

Based on the previous research described above, this study focuses on deconstructing norms that have the potential to lead to abuse of power by the Indonesian National Police (Polri), specifically Article 14 paragraph (1) letter O and Article 16 paragraph (1) letter Q, which grant the Indonesian National Police excessive authority to conduct wiretapping, surveillance, enforcement, and blocking of public cyberspace if deemed a threat to domestic security. This study uses Jeremy Bentham's utilitarian perspective to analyze the legal product of the National Police Draft based on considerations of the pleasure and pain of affected parties. In analyzing the National Police Draft, researchers utilized hedonistic calculus to describe the benefits and harms arising from the National Police Draft.

Based on the above description, this study attempts to present an analysis of the legal norms in Article 14 paragraph (1) letter O and Article 16 paragraph (1) letter Q of the National Police Draft and calculate the potential pleasure and pain arising from the enactment of the National Police draft using hedonistic calculus.

Therefore, the research problem is formulated as follows: How is the analysis of the problems arising from Article 14 paragraph (1) letter O and Article 16 paragraph (1) letter Q conducted? How does utilitarian theory assess the pleasure and pain of Article 14 paragraph (1) letter O and Article 16 paragraph (1) letter Q based on hedonistic calculus?

## Method

This research focuses on normative legal research to explain the issues and urgency of the phenomena outlined in the introduction. Normative research is defined as the study of laws and regulations based on concepts, norms, principles, and legal principles to elucidate the issues discussed. Normative research is also defined as doctrinal research or library research because the focus of the research is centered on the legal system. This research utilizes both a statute approach and a conceptual approach. The statute approach is defined as a normative review of laws and regulations that correlate with the issues raised. Meanwhile, the conceptual approach tends to be used to fuse doctrinal views and legal thinking that already exist in academic literature to provide a theoretical basis for the research problem [11].

In synthesizing and analyzing legal materials, a bibliographic study method is used for primary, secondary, and tertiary legal materials. Literature review focuses on research into publicly accessible and accessible written legal information, such as laws, draft laws, and jurisprudence. These legal materials will be analyzed through inventory, identification, and classification. The legal materials are analyzed using legislative and conceptual approaches to elucidate the essence of the issues discussed [12].

## Results and Discussion

### 1. Analysis of Legal Norms in Article 14 Paragraph (1) Letter O and Article 16 Paragraph (1) Letter Q

Based on the provisions of Article 14 paragraph 1 letter O, one of the forms of Polri's duties is to conduct wiretapping in accordance with the provisions of the law governing wiretapping. Referring to the KBBI, wiretapping is defined as a procedure or process for wiretapping, including the activity of recording (listening) information or secret conversations intentionally and without the person's knowledge [13]. Regulations regarding wiretapping create a gap in authority with law enforcement agencies such as the Corruption Eradication Commission (KPK). In Law of the Republic of Indonesia Number 19 of 2019 concerning the Second Amendment to Law Number 30 of 2002 concerning the Corruption Eradication Commission, Article 12B paragraph 1, the KPK can only exercise its wiretapping authority by obtaining written permission from the KPK Supervisory Board. Meanwhile, the draft does not contain explicit regulations regarding the mechanism for obtaining wiretapping permits by the Polri, thus potentially leading to arbitrary power. In line with this, this regulation creates legal uncertainty because, at the time of this research, Indonesia did not have a *lex specialis* law governing wiretapping, thus creating the potential for *ultra vires* action by police officers [14].

Furthermore, Article 16 paragraph (1) letter Q provides the authority to supervise, guide, and secure cyberspace, accompanied by enforcement, blocking, disconnection, and efforts to slow down access to cyberspace [15] if it is deemed to have the potential to threaten "domestic security." Normative provisions regarding the definition of domestic security are not explicitly regulated and are very limited. This situation has the potential to trigger ongoing conflict, especially if criticism is perceived as potentially disturbing public order, thereby curtailing the public's right to express opinions and criticism.

Reflecting on the history of actions that cut off and slowed down access to cyberspace that occurred in 2019 in the Papua and West Papua regions, referring to jurisprudence Number: 230/G/TF/2019/PTUN-JKT [16], the West Jakarta

State Administrative Court ruled that these actions were unlawful due to the violation of the provisions of the ITE Law and the human rights to obtain information and express opinions<sup>[17]</sup>.

## 2. Utilitarian Perspective on the Draft National Police Law

As proposed by Jeremy Bentham, the utilitarian concept focuses on achieving utility as the goal of law. Bentham believed that good law should provide more benefits than harm to society<sup>[18]</sup>, therefore, utility is perceived as equal to happiness (utility is perceived as equal to happiness)<sup>[19]</sup>. This theory holds that an action is considered right as long as it produces more benefits than harm<sup>[20]</sup>. Therefore, John Rawls, in his Theory of Justice, argued that a person can be enslaved as long as the slave is happy<sup>[21]</sup>. This flaw in the theory was corrected by Stuart Mill through the harm principle<sup>[22]</sup>, which states that everyone is free to pursue the greatest happiness for their survival as long as it does not conflict with the law and does not harm the interests of others<sup>[23]</sup>.

In addition to being a legal goal, in the research of Endang Pratiwi and colleagues, the utilitarian concept can also be used as a tool to test a legal product through hedonistic calculus to determine whether the legal product provides greater benefits than harm to those regulated or affected by the regulation. In the context of the National Police draft, the parties affected by this regulation include the government, the National Police, and the public. Because laws are a tool of state control and power codified by the government, the National Police draft becomes a tool of power and politics, used as a means to maintain the hegemony of the authorities through articles that have the potential to reduce public participation in criticism and opinion, especially if such criticism and opinion are deemed to threaten domestic security<sup>[24]</sup>.

Using the hedonistic calculus, researchers describe the elements of benefit and harm in the National Police draft using two perspectives: the government and the police, and the public. The researcher's analysis of the draft based on hedonistic calculus:

### 1. Intensity is defined as the level of frequency of pleasure/pain provided to the parties

- a. From the perspective of the government and the police, the enactment of the National Police draft, particularly Article 14 paragraph (1) letter O and Article 16 paragraph (1) letter Q, will grant the police superior authority to intercept, block, and slow down public cyberspace if deemed to threaten domestic security. In line with this, the government can suppress public criticism of government implementation, thereby providing greater scope for government power. Therefore, this draft provides a benefit for the government and the National Police (Polri).
- b. From the public's perspective, if Article 14 paragraph (1) letter O and Article 16 paragraph (1) letter Q are enacted, all public cyber activities will automatically be under full police surveillance, potentially threatening freedom of expression and public criticism of government implementation. Therefore, this draft causes pain for the public.

### 2. Duration refers to how long the parties will endure the pleasure/pain

- a. From the perspective of the government and the National Police, if this draft is enacted, as long as the regulations are not amended or repealed through judicial review by the Constitutional Court (MK), they will remain in effect. Therefore, this draft provides a benefit for the government and the National Police.
- b. From the public's perspective, the lack of enjoyment causes pain for the public.

### 3. Certainty refers to the degree to which pleasure/pain can be provided through legal accommodation

- a. From the perspective of the government and the National Police (Polri), the pleasure obtained is certainly very certain because if this draft is enacted, it will provide a legal basis and certainty for the implementation of the Polri's authority, particularly in Article 14 paragraph (1) letter O and Article 16 paragraph (1) letter Q. Therefore, this draft provides pleasure for the government and the Polri.
- b. From the public perspective, with the enactment of the Polri Draft, the public will be subject to these regulations regarding supervision, enforcement, and wiretapping by the Polri in cyberspace, even though there is no *lex specialis* law on wiretapping. Therefore, this draft causes pain for the public.

### 4. Propinquity is a calculation of the likelihood of how quickly/long a pleasure/pain can be felt

- a. From the perspective of the government and the National Police (Polri), following the enactment of the National Police Draft, the regulation has provided a legal basis for the implementation of the police's authority, as explained in Article 14 paragraph (1) letter O and Article 16 paragraph (1) letter Q. Therefore, this draft provides pleasure for the government and the National Police.
- b. From the public perspective, by utilizing the concept of the presumption of *rechmatig*, this regulation will be considered correct and appropriate and must be obeyed by the public as long as there are no changes or revocations. Therefore, the only way for the public to address this problem is to request a judicial review. Even if a judicial review is requested, a draft that has been enacted cannot be temporarily suspended and can only be stopped if there is a Constitutional Court ruling that nullifies the regulation. Therefore, this draft causes pain to the public.

### 5. Fecundity is the possibility of pleasure/pain being followed by similar things

- a. The perspective of the government and the National Police. In the legal framework of the National Police Draft, this regulation is intended to improve the performance of the National Police's function in protecting the human rights of the public due to the emergence of new *modus operandi* related to crime, as the National Police's function is to protect and serve the public. Therefore, this draft provides a sense of satisfaction for both the government and the National Police.
- b. From a societal perspective, the legal framework of the National Police Draft is fundamentally beneficial to the public. However, in reality, the National Police often abuses its power for the benefit of certain groups

(including the government) rather than for the benefit of the wider public. To improve the function and performance of the National Police, improvements to the recruitment, education, accountability, and oversight systems, which have been deemed chaotic and reflected in various cases involving National Police officers, are needed. Therefore, this draft provides both pleasure and pain to the public.

**6. Purity is defined as the phenomenon where pleasure is followed by pain**

- a. From the perspective of the government and the National Police, with the enactment of the National Police Draft, the government can use the National Police as a political and power tool to fulfill the hegemonic interests of those in power. However, on the other hand, considering that Indonesia is a democratic country and the government gains power through elections, the public has the right to demand the cancellation and revocation of the draft, which is generally carried out through demonstrations. This action can disrupt the stability of government power, as is historically recorded in its ability to bring down President Soeharto's 32-year regime. Therefore, the draft provides both pleasure and pain.
- b. From a societal perspective, the National Police Draft provides both pleasure and pain to the public, as explained in point 5 letter b.

**7. Extent refers to the extent and number of parties who can experience pleasure or pain**

- a. The perspective of the government and the National Police, considering that this draft regulation refers to the law so that all parties, both the government, the community, and especially the National Police must comply with this regulation specifically in Article 14 paragraph (1) letter O and Article 16 paragraph (1) letter Q. Realistically, although the government and the National Police are also subject to this regulation, the government and the National Police are parties that have more power than the community so that often this power is specifically allocated for personal interests/other parties rather than siding with the community. Therefore, this draft provides pleasure for the government and the National Police.
- b. The community perspective, the non-acceptance of pleasure thus causes pain for the community.

Based on all the points that have been outlined in the hedonistic calculus calculations, the researchers summarize them in table 1.

**Table 1:** Total Pleasure and Pain Calculations

No	Variables	Gov. & Police		Community	
		Pleasure	Pain	Pleasure	Pain
1	Intensity	1	-	-	1
2	Duration	1	-	-	1
3	Certainty	1	-	-	1
4	Propinquity	1	-	-	1
5	Fecundity	1	-	1	1
6	Purity	1	1	1	1
7	Extent	1	-	-	1
Total			7	1	2

Based on the results of the hedonistic calculus, the analysis shows that the National Police Draft will inflict excessive pain on the public, thus preventing the effectiveness and utility of the law. Instead, it will simply serve as a means for the government to use the National Police as a tool to maintain and preserve power. The public will be forced to submit through the implementation of Article 14 paragraph (1) letter O and Article 16 paragraph (1) letter Q. Criticism and opinions that contradict government actions can be considered a potential threat to domestic security and order. Therefore, to maintain the government's hegemony, the National Police Draft aims to stifle all public criticism, especially in cyberspace.

Reflecting on cases of government and National Police corruption uncovered through cyberspace due to public participation in monitoring developments, such as the murder of Brigadier Joshua by Police Inspector General Ferdy Sambo. This case was initially considered a simple murder, but the numerous irregularities and oddities of the case led to further public investigation through cyberspace, ultimately revealing that it was a premeditated murder by Ferdy Sambo against Joshua <sup>[25]</sup>.

Given all of the above, the National Police Draft will not bring pleasure to the public, but only pain and reduce public participation in monitoring government implementation through criticism and opinions online. This draft will only serve as a political tool and a means for the government to maintain the hegemony of the authorities and their affiliates. Considering the draft's rationale, improving the function and performance of the National Police (Polri) should be done through reforming and revising its currently chaotic system. This system can be achieved by revising the National Police Law, focusing on oversight and sanctions rather than expanding police authority, and by reforming the police's ruling structure to introduce innovative new regulations that are expected to benefit the public.

**Conclusion**

The expansion of the National Police's authority as stipulated in the National Police Draft, Article 14 paragraph (1) letter O and Article 16 paragraph (1) letter Q, has the potential to cause constitutional injury through the Police's wiretapping authority, which lacks a clear and strict mechanism, and efforts to limit online criticism and public opinion, particularly if criticism is deemed to pose a threat to domestic security. This problem leads to a legal vacuum and uncertainty regarding the Police's wiretapping and cyberspace surveillance. This expansion of authority also has the potential to lead to abuse of the Police's authority and cause massive harm to the public.

In line with this, based on the results of a utilitarian perspective analysis using the hedonistic calculus, the enactment of the draft only provides excessive pleasure to the government and the National Police and excessive pain to the public. The draft is unable to provide benefits for the public's legal interests, but instead becomes a weapon for the government and the National Police to suppress public criticism and opinion and perpetuate the hegemony of those in power and their affiliates.

**References**

1. Daniel Junwaldi MP Nainggolan. Penggalangan Intelijen Dalam Pencegahan Penyebaran Hoax Menjelang Masa Pemilihan Presiden di Wilayah

- Hukum Polres Salatiga. Indonesian Journal of Police Studies,2020:4(1):67–106.
2. YLBHI. Polisi Masa Kini Brutalitas Minim Akuntabilitas. Yayasan Lembaga Bantuan Hukum Indonesia, 2022.
  3. PSHK. Tolak RUU POLRI Kepolisian Negara Republik Indonesia Yang Menjadikan POLRI Lembaga Superbody Dan Gagal Mendesain Perbaikan Fundamental. Pusat Studi Hukum dan Kebijakan Indonesia, 2024.
  4. Andri Yanto. Mazhab-Mazhab Hukum Suatu Pengantar Memahami Dimensi Pemikiran Hukum. Segap Pustaka, 2021.
  5. Boy Aditya Prakasa, Elisatris Gultom. Jeremy Bentham's Utilitarianism Theory Methodology in the Corporation Law System in Indonesia. JISPENDIORA: Jurnal Ilmu Sosial Pendidikan dan Humaniora,2025:4(1):697.  
<https://doi.org/10.56910/jispendiora.v4i1.2512>
  6. Endang Pratiwi, Theo Negoro, Hassanain Haykal. Jeremy Bentham's Utilitarianism Theory Legal Purpose or Methods of Legal Products Examination. Jurnal Konstitusi,2022:19(2):280.  
<https://doi.org/10.31078/jk1922>
  7. Philosophy Lander Education. Philosophy 302 Ethics the Hedonistic Calculus. Philosophy Lander Education, 2017.
  8. Mahbub Syaltut, *et al.* Politik Hukum Urgensi Revisi UU Kewenangan Polri. Jurnal Hukum dan Kewarganegaraan,2025:13(9):1–18.  
<https://doi.org/10.3783/causa.v2i9.2461>
  9. Alberta Debora, Alva Kambuno, Jannah Desiree Pabeangi. Tinjauan Hukum Terhadap RUU Polri Efektivitas Penegakan Hukum dan Resiko Penyalahgunaan Wewenang Rancangan Undang-Undang Tentang Kepolisian Negara Republik Indonesia. Jurnal Multilingual,2025:5(1):416–425.
  10. Yaris Adhial Fajrin, *et al.* Critical Analysis of the Republic of Indonesia Police in the Implementation of Cybercrime Law in Indonesia. Journal Equity of Law and Governance,2022:4(1):119–128.
  11. Muhaimin. Metode Penelitian Hukum. Mataram University Press, 2020, 45–57.
  12. Muhaimin. Metode Penelitian Hukum. Mataram University Press, 2020, 64–65.
  13. KBBI. KBBI Sadap. Kamus Besar Bahasa Indonesia, 2025.
  14. PSHK. Tolak RUU POLRI Kepolisian Negara Republik Indonesia Yang Menjadikan POLRI Lembaga Superbody Dan Gagal Mendesain Perbaikan Fundamental. Pusat Studi Hukum dan Kebijakan Indonesia, 2024.
  15. Muhamad Isnur. Problematika RUU POLRI Catatan Koalisi Masyarakat Sipil Untuk Reformasi Kepolisian, 2024, 15–16. <https://www.dpr.go.id/uu/pr>.
  16. LBH Pers. Putusan Pengadilan Tata Usaha Negara 230/G/TF/2019/PTUN-JKT. LBH Pers, 2020, 1–132.
  17. AJI. PTUN Jakarta Menyatakan Pemutusan Akses Internet di Papua Melanggar Hukum. Aliansi Jurnalis Independen, 2020.
  18. Rizki Ridwansyah. Konsep Teori Utilitarianisme dan Penerapannya dalam Hukum Praktis di Indonesia Rizki, 2023, 1–17.  
<https://doi.org/10.11111/nusantara.xxxxxxx>
  19. Prakasa BA, Gultom E. Jeremy Bentham's Utilitarianism Theory Methodology in the Corporation Law System in Indonesia. JISPENDIORA: Jurnal Ilmu Sosial Pendidikan dan Humaniora,2025:4(1):698.
  20. Nurwidya Kusma Wardhani, Tulus M Lumban Gaol, Taufiqurrohman Syahuri. Penerapan Konsep Teori Utilitarianisme Dalam Penegakan Hukum Di Indonesia. Jurnal Relasi Publik,2023:2(1):218.  
<https://doi.org/10.59581/jrp-widyakarya.v2i1.2179>
  21. Markus Y Hage, Bernard L Tanya, Yoan N Simanjutak. Teori Hukum Strategi Tertib Manusia Lintas Ruang dan Generasi. Genta Publishing, 2019.
  22. Cesar Ruiz Sanjuan. John Stuart Mill on the Relation between Society and Individual Regarding Personal Liberty. Philosophy Journal of the Higher School of Economics,2018:2(3):66–88.  
<https://doi.org/10.17323/2587-8719-2018-ii-3-66-88>
  23. V Andri Hananto. Utilitarianisme dan Keseimbangan antara Kepentingan Umum dan Kepentingan Individu. Jurnal Hukum IUS QUIA IUSTUM,2025:32(1):87–89.  
<https://doi.org/10.20885/iustum.vol32.iss1.art4>
  24. Pratiwi E, Negoro T, Haykal H. Jeremy Bentham's Utilitarianism Theory Legal Purpose or Methods of Legal Products Examination. Jurnal Konstitusi,2022:19(2):269–270.
  25. Fransesco Agnes Ranubaya, Reginald Siddarta, Yohanes Endi. Analisis Kasus Pembunuhan Berencana Brigadir J oleh Ferdi Sambo Dalam Tinjauan Hukum Norma Moral Obyektif dan Subyektif. Gloria Justitia,2024:4(1):19–39.  
<https://doi.org/10.25170/gloriajustitia.v4i1.5430>