



E-ISSN:
2721-13988

Legal Analysis of the Judge's Considerations in Verdict No. 34/Pid.Sus-TPK/2025/PN Jkt.Pst on Corruption in the Case of Raw Crystal Sugar Imports

Soeko Hariyanto^{1*}

¹Master of Laws Study Program, University of Merdeka Malang, Indonesia

*Corresponding author: dishubharry@gmail.com

Abstract.

Many acts of corruption in Indonesia involve officials who, in their positions, have the authority to commit such acts. One of the criminal acts of corruption in the court is the case No. 34/Pid.Sus-TPK/2025/PN Jkt.Pst concerning Criminal Acts of Corruption in the Case of Raw Crystal Sugar Imports involving the former Minister of Trade in 2015-2016, Tom Lembong. The court ruling states that Tom was found to have committed a criminal offense in accordance with the elements set out in Article 2 of the Corruption Eradication Law, in conjunction with Article 55(1) of the Criminal Code. Tom Lembong's actions, which contravened several applicable legal provisions, were deemed unlawful. However, the facts of the trial showed that there was no *mens rea* and that there was confusion in calculating the value of state losses. This raised doubts about the court ruling that will be examined further in this article. The method used in this article is a normative legal method with a statutory approach, based on the collection of various legal sources, including statutory regulations, books, and scientific journals, which are reviewed to understand the application of *mens rea* in proving acts of corruption by Tom Lembong. The article concludes that the lack of proof of criminal intent (*mens rea*) at trial led the panel of judges to issue an inappropriate verdict against the defendant, Tom Lembong.

Keywords: Corruptions, Mens Rea, Tom Lembong.

1. Introduction

Laws are created to give people confidence in each other's different interests, with the goal of achieving prosperity and justice. To understand good law enforcement, it is important to grasp its principles, which help parties seeking justice know what is involved in a case before initiating it (Jainah, 2022). Criminal law enforcement is often the focus of attention. Criminal law is a set of rules that determines which actions are prohibited and imposes sanctions, including specific penalties, for those who violate them (Wati, 2020). One of the most common crimes in Indonesia is corruption. According to Goodstats data (citing the Corruption Eradication Commission), the total number of corruption cases handled from 2004 to October 16, 2025, was 1,706. The prosecution process was recorded from 2004 to 2025, with 1,433 cases resulting in 1,278 cases with final legal force (*inkracht*) (Shahibah, 2025).

Several cases have been brought before the Corruption Court in Indonesia, such as the Jiwasraya case, a state insurance corruption case involving several defendants sentenced to life imprisonment, resulting in enormous state losses (Sidik, 2020). Then, the Asabri case, which involved corruption at Asabri Company (a state-owned insurance company), was one of the cases that caused the state to incur trillions of rupiah in losses (Dirgantara & Setuningsih, 2023).



E-ISSN:
2721-13988

There is also the BILA case, which is Bank Indonesia Liquidity Assistance (BILA) (Wicaksono, A., 2024), and so on.

Corruption is one of the most common criminal offenses in Indonesia, a serious crime with a widespread impact. Corruption can hinder economic development because resources intended for equity and justice cannot be distributed evenly within the community. The impact of corruption on the real sector will hinder progress across various areas, resulting in a lack of job opportunities, incomes that fall short of living standards, extreme social inequality, and low levels of health and education (Lamijan, 2022).

Corruption crimes that frequently occur in Indonesia are often related to the actions and policies of officials with authority or state administrators who commit corruption in their positions. In corruption crimes, abuse of authority is recognized as a criminal element under the Corruption Eradication Law. Such acts are no longer merely administrative violations but constitute crimes when committed with the intent to benefit oneself, others, or corporations, which may result in financial loss to the state or harm to the national economy. Proving this element requires establishing a causal link between the misuse of authority and the resulting illegal loss or gain, as defined by the law (Kaseger, 2017).

In relation to his position as Minister of Trade from 2015 to 2016, Thomas Trikasih Lembong, or Tom Lembong, granted permission for private companies to import raw crystal sugar in accordance with Minister of Trade Regulation No. 117/M-DAG/PER/12/2015 concerning Sugar Import Provisions, which replaced Minister of Industry and Trade Decision No. 527/MPP/Kep/9/2004. One provision of this regulation stipulates that sugar imports are permitted only in the form of white crystal sugar and must be carried out by State-Owned Enterprises (SOEs). In connection with this policy, the Attorney General's Office assessed that there was a suspicion of corruption committed by Tom Lembong, leading to his arrest, investigation, and subsequent designation as a suspect on October 29, 2024. In a press conference, Abdul Qohar, Director of Investigation at the Attorney General's Office, revealed that on May 12, 2015, Indonesia experienced a sugar surplus. Following an inter-ministerial meeting, it was decided that sugar imports were unnecessary. However, Tom Lembong implemented a sugar import policy and approved the import of 105,000 tons of raw crystal sugar to eight private companies, which were then processed into white crystal sugar. Subsequently, the Company, Perusahaan Perdagangan Indonesia (PPI), appeared to purchase sugar from these eight private companies. However, in reality, the sugar was sold directly to the public through distributors at 16,000 rupiah per kilogram, which was higher than the average cost at the time of 13,000 rupiah per kilogram. In this transaction, PPI Corporation received a fee of 105 rupiah per kilogram.

After this pretrial motion was rejected, the legal process continued through 23 court hearings and culminated in the verdict on July 18, 2025. Attorney General Sigit Sambodo stated that Tom Lembong did not receive any funds from the alleged corruption case involving sugar imports, but his policies enriched 10 corporations. Several aggravating factors in the verdict stated that Tom Lembong, among other things, prioritized a capitalist economy over a democratic economic system and the Pancasila economic system based on the 1945 Constitution, which emphasizes general equality and social justice. The defendant carried out his duties and responsibilities based on the principle of legal certainty, establishing the law through statutory provisions as the basis for every policy decision aimed at controlling and stabilizing prices in the trade sector, particularly in the sugar industry. The defendant did not



carry out his duties and responsibilities in an accountable and responsible manner, nor did he act in a beneficial and fair manner in controlling the stability of sugar prices, which are affordable for the public as end consumers or as a basic necessity in the form of white crystal sugar. Fourth, the defendant disregarded the public's interests as end consumers of white crystal sugar in obtaining it at stable, affordable prices. The price of white crystal sugar remained high in 2016, at 13,149 rupiah per kilogram in January 2016 and 14,213 rupiah per kilogram in December 2016.

In the public sphere, there are many indicators that support the assumption that the law has been politicized in the Tom Lembong corruption case. Mahfud M.D. said this case has political implications because the corruption case involving sugar imports occurred a long time ago. However, the case was only brought up in 2024. Additionally, the Supreme Prosecutor's Office's rejection of Tom Lembong's request to investigate five other Trade Ministers—one who had previously served and four who had served afterward—has further fueled public suspicion of alleged criminalization against Tom Lembong. This is because the letter designating Tom as a suspect, issued by the Attorney General's Office, includes a statement on the timeframe for investigating the alleged corruption in this field during 2015-2023 (Nusantara, 2025). Another irregularity that triggered a negative public response was the absence of any flow of funds received by the defendant, and the panel of judges' explanation that losses incurred by state-owned enterprises constitute losses to the state.

Based on the case above, this article examines the suitability of the Judge's basic considerations in Verdict No. 34/Pid.sus-TPK/2025/PN.Jkt.Pst. with the trial facts, and analyzes the suitability of the Judge's verdict with the substantive theory of justice, along with the author's opinion of this case.

2. Method

This study uses a literature review method, which involves examining various sources related to the research object. The data used are qualitative secondary data, including primary legal materials (laws and regulations) and secondary materials (legal literature, articles, research journals, expert opinions, and court verdicts). Qualitative research is research that procedures descriptive data in the form of written or spoken words from people and observable behaviour (Moleong, 2019). Data collection techniques were carried out through a literature study, with normative analysis using grammatical, systematic, and teleological interpretation methods.

3. Result and Discussion

In proving a criminal act, the perpetrator's intent often poses a challenge for law enforcement. Intent or deliberateness is subjective and hidden in the perpetrator's mind. Therefore, proving intent must be supported by strong evidence, such as witness statements, physical evidence, and the perpetrator's behaviour before, during, and after the crime was committed (Helmi & Ihya', 2023). The process of proving intent becomes more complex and requires careful consideration to determine a verdict that aligns with the defendant's actions. A criminal act without adequate proof of intent will result in a miscarriage of justice. Actions without clear intent can result in unfair punishment. Therefore, it is important for the legal



system to distinguish between actions committed with malicious intent and those committed without significant intent (Munandar et al., 2024).

3.1. Mens Rea Elements in the Tom Lembong Case

Proving the element of abuse of authority in corruption cases is often complex. In addition to proving formal actions that deviate from the rules, prosecutors must also prove the perpetrator's malicious intent (*mens rea*) (Mallarangeng et al., 2023). It must be shown that the official consciously used his or her power improperly to achieve prohibited objectives. Expert witness testimony, investigative audits, and document analysis are important for uncovering how authority was abused and how this directly resulted in losses to the state or in enrichment for the perpetrator or others.

In the Indonesian criminal justice system, the concept of intent, or *mens rea*, is a key element that determines an individual's criminal liability. Without intent or the element of deliberate action in a criminal act, it is difficult for law enforcement authorities to prove that an individual is truly responsible for their actions. The term *mens rea* originates in Latin and means "guilty mind." In the criminal justice system, *mens rea* is defined as the intent or awareness of an individual when committing an act that violates the law (Syukur, 2015). In Indonesia, *mens rea* is a concept relevant to the fault element that must be proven in a criminal case. According to the Criminal Code, most criminal acts require the element of intent or purpose. Some criminal acts also recognize negligence or carelessness as a lighter form of *mens rea* (Sibarani, 2022). Therefore, understanding the differences among intent, negligence, and other forms of *mens rea* is crucial for determining the perpetrator's level of guilt and the appropriate punishment.

Mens rea is important in criminal law because it emphasizes that a person can be found guilty only if they had the appropriate mental state when committing the criminal act. This means that to declare someone guilty of a crime, it must be proven that the perpetrator not only committed an unlawful act but also did so with a specific intent. In Indonesia, without intent or fault on the part of the perpetrator, an act is generally not subject to criminal punishment, especially in criminal acts that require an element of intent.

In the corruption trial of the former Minister of Trade for the 2015-2016 period, Tom Lembong, the panel of judges stated that the defendant was not proven to have *mens rea* (malicious intent) and did not personally gain from the policies he implemented. This fact is crucial because, in criminal law doctrine, malicious intent is an important element in proving criminal guilt (Sutopo & Panjaitan, 2025).

As an official, Tom Lembong has certain discretion, especially when there is no evidence of malicious intent or personal gain. Discretion is the freedom public officials have to make decisions or take action in certain situations, especially when laws and regulations do not provide clear or complete guidance, or when government administration is stagnant. Discretion is granted to address concrete issues encountered in the performance of duties and the exercise of authorities, while adhering to the objectives of good governance. This is regulated in Law No. 30 of 2014 on Government Administration.

3.2. Experts Opinion regarding Verdict No. 34/Pid.Sus-TPK/2025/PN Jkt.Pst concerning Criminal Acts of Corruption in the Raw Crystal Sugar Import Case

Dr. Riza Alifianto Kurniawan, an expert in criminal law and health law at the Faculty of Law, UNAIR, stated that this case touches on the most sensitive areas, such as the interpretation between administrative actions and criminal acts of corruption. This constitutes criminalization



E-ISSN:
2721-13988

of public policy (Alfafa, 2025). The judge's decision to interpret the action as "against the law" in an administrative context amounts to criminalization of public policy.

This creates legal ambiguity that could threaten the independence of decision-making within executive institutions. Furthermore, this contradicts the Business Judgment Rule, a standard in modern government and corporate governance.

According to Syahuri, discretion exercised within the framework of existing regulations and not overturned by the court cannot be treated as an illegal act. Interpreting discretion as an abuse of power without evidence of actual legal violations would mislead the law enforcement process. If there is no *mens rea* or malicious intent, and no personal gain (gratification, bribery, kickbacks), then legally, the elements of corruption are not fulfilled. Thus, deciding that administrative errors or even discretionary decisions are criminal acts constitutes overcriminalization that betrays the principle of justice (Syahuri, 2025).

If discretionary policies are criminalized, it will result in a very narrow scope of action for public officials. Officials will hesitate to make strategic decisions. Yet many policy situations require the courage to act despite gaps or ambiguities in the rules.

Mahfud MD explains that if there is no *mens rea* element, then a person should not be punished. He explains that this is based on a fundamental principle in law, namely, "*geen straf zonder schuld*." This principle means that no one should be punished or convicted if there is no fault or no *mens rea* (intent, knowledge, recklessness, or negligence). If a criminal case does not prove any of these four categories, Mahfud argues that whatever happened cannot be punished (Tempo, 2025).

Following this determination, Tom Lembong filed a pretrial motion against the Attorney General's Office for naming him as a suspect. According to expert testimony, Mudzakkir, a criminal law expert presented by Tom's side, highlighted the absence of an official report from the authorities regarding state financial losses in the case that ensnared Tom Lembong. Meanwhile, Tom Lembong's lawyer, Ari Yusuf Amir, questioned the origin of the data on state losses resulting from the sugar import policy signed by his client. According to him, the Supreme Audit Agency, as the institution authorized to conduct state financial audits, never stated that Tom Lembong's policy harmed the state. In other words, there is no fundamental evidence of a violation of Articles 2 and 3 of Law Number 31 of 1999 concerning the Eradication of Corruption, namely state financial losses. Therefore, the policy is not a criminal act, and thus, naming Tom Lembong as a suspect is invalid (Library, B., 2025).

In the trial verdict, Tom Lembong was found guilty of corruption by the panel of judges in accordance with the charges of Article 2 paragraph (1) of the Corruption Eradication Law in conjunction with Article 55 paragraph (1) point 1 of the Criminal Code and was sentenced to 4 years and 6 months in prison and a fine of Rp. 750 million, a subsidiary to 6 months in prison. However, several odd aspects of the trial sparked public polemics and negative assessments of the verdict issued by the panel of judges. Various experts and public assessments support Tom Lembong in filing an appeal at the High Court for his release (Awaludin et al., 2025).

The pretrial hearing resulted in the judge rejecting Tom Lembong and his legal team's petition. The South Jakarta District Court judge rejected the pretrial motion to name former Trade Minister Thomas Trikasih Lembong, also known as Tom Lembong, a suspect in the sugar import corruption case. One of the reasons the judge rejected Tom's pretrial motion was that the Attorney General's Office investigators' evidence of 400 billion rupiah in state financial



E-ISSN:
2721-13988

losses, derived from an audit by the Supreme Audit Agency, was sufficient. In his statement, the judge stated that the investigators were sufficient to present the actual state financial losses, which can be calculated in the sugar import corruption case. The state's financial losses in the case will be determined by the judge hearing.

The potential financial loss to the state or the national economy is a direct consequence that must be proven concretely in this alleged case. Analysis based on theoretical frameworks and the Anti-Corruption Law emphasizes that such losses must be tangible and directly causally related to the alleged abuse of authority. Quantitative proof of state losses, often through investigative audits by authorized institutions, is an essential element. The complexity of the proof lies in the need to demonstrate that the losses were indeed caused by intentional abuse of authority, rather than merely the result of policy risks or ordinary administrative errors (Kasman, 2025). In court, the judge stated that the amount of state financial losses in sugar import activities was 194.71 billion rupiah. This calculation represents the profits that Perusahaan Perdagangan Indonesia (PPI) should have earned from sugar imports. The judge noted that the company is part of the state-owned food holding company ID Food, so the losses it incurred are state losses. This is inaccurate because State-Owned Enterprises (SOEs) have their own legal status, and losses arising from their operational or investment activities are SOE losses, not losses to the state. Therefore, in this case, Tom Lembong cannot be proven to have caused losses to the state, further supported by the absence of personal gains obtained from this sugar import policy.

The absence of state losses or personal gain, as proven in court, was reinforced by the testimony of an economic expert witness, Vid Adrison, Head of the Department of Economics at the Faculty of Economics and Business, University of Indonesia, who assessed that the Ministry of Trade's action to import raw crystal sugar could stimulate the domestic economy. The reason is that imported crystal raw sugar must be processed by factories into white crystal sugar. As a result of this process, the government obtains added value when it imports raw or non-raw crystal sugar that can be consumed directly. This method is considered to have a chain effect on the economy because, in addition to absorbing labor, raw crystal sugar imports also save foreign exchange, thereby positively affecting the exchange rate (Salam, 2025).

Based on the data, theory, and expert opinions that have been previously stated, the author is of the opinion that the case that occurred with the convict Tom Lembong is not in accordance with the indictment of the public prosecutor where Tom Lembong did not commit a criminal act of corruption, there was no malicious intent (*mens rea*) and there was no element of intent in a criminal act. It was not found that Tom Lembong received money or enriched himself and there was no personal gain obtained from this sugar import policy, there was no element of intent to take Discretion/policy is the freedom that is owned as Minister of Trade or public officials to make decisions or actions in certain situations, especially when laws and regulations do not regulate clearly or completely, or there is a state of stalled government administration. Discretion is given to address concrete problems encountered in carrying out duties and exercising authority, while still adhering to the objectives of good governance. This is regulated in Law No. 30 of 2014 concerning Government Administration. so that it benefits private companies and harms state-owned enterprises as the owner.

Thus, the author assesses that the determination of Tom Lembong as a suspect constitutes a form of criminalization of public policy, creating legal ambiguity that could threaten the executive branch's decision-making independence. Meanwhile, what Tom Lembong did was



merely an administrative error. Therefore, Tom Lembong's error can be submitted to the State Administrative Court. In other words, there is no fundamental evidence of a violation of Articles 2 and 3 of Law Number 31 of 1999 concerning the Eradication of Corruption, namely state financial losses. Therefore, the policy is not a criminal act; therefore, the determination of Tom Lembong as a suspect is invalid. Tom Lembong did not receive any funds from the alleged sugar import corruption case, and, based on the principle of legal certainty and on statutory provisions as the basis for making every policy to control and stabilize prices in the trade sector, especially sugar.

4. Conclusion

The conclusion of this study shows that the verdict handed down to former Minister of Trade Tom Lembong in the 2015-2016 sugar import case was not in line with the facts presented in court. The lack of proof of criminal intent (*mens rea*) during the trial and the lack of proof of state losses resulting from the sugar import process carried out by the defendant are important factors that should have served as grounds for acquitting Tom Lembong. However, imposing a 4-year-and-6-month prison sentence could have various negative effects on similar policies implemented by other officials. An interpretation that views discretion as an abuse of power without evidence of actual legal violations will undermine the confidence of other public officials in making policy decisions. Innovation and discretion in governance will be replaced by passive and defensive attitudes.

The law should not be used as a political tool. The law should be an instrument of justice, not a tool for criminalizing policies. If there are allegations of violations of administrative policies, they should be resolved through the State Administrative Court, not the criminal court. This approach is also in line with the principle of criminal law that criminal punishment is the last resort after all administrative and civil efforts have been exhausted (*ultima ratio*).

References

- Alfa, S. (2025). Pakar UNAIR Soroti Polemik Kasus Impor Gula Tom Lembong. Unair. [Online]. Available: <https://unair.ac.id/pakar-unair-soroti-polemik-impor-gula-tom-lembong>.
- Awaludin, A., Randiana, P., Lambouw, G., Suhendi, A., Wiradirja, I., Haspada, D. (2025). Realitas dan Idealitas dalam Penegakan Hukum di Era Kegundahan Politik. *Al-Zayn Jurnal Ilmu Sosial dan Hukum*, 3(4), 4212-4220. <https://doi.org/10.61104/alz.v3i4.1924>
- Dirgantara, A., and Setuningsih, N. (2023). Perjalanan Kasus Korupsi Asabri dengan Terdakwa Benny Tjokrosaputro, Divonis Hari Ini. Kompas. [Online]. Available: <https://nasional.kompas.com/read/2023/01/12/10582381/perjalanan-kasus-korupsi-asabri-dengan-terdakwa-benny-tjokrosaputro-divonis?page=all>.
- Helmi, H. & Ihya', R. (2023). Peranan Rekonstruksi Pada Proses Penyidikan dalam Upaya Mengungkap Kejahatan. *IMTIYAZ: Jurnal Ilmu Keislaman*, 7(2), 129-150.
- Jainah. (2022). *Penegakan Hukum yang Berkeadilan: Teori dan Praktik*, Sinar Grafika, Jakarta.



E-ISSN:
2721-13988

PROCEEDINGS OF THE INTERNATIONAL CONFERENCE OF GRADUATE
SCHOOL ON SUSTAINABILITY (ICGSS)

10th International Conference on Sustainability (ICoS10)

University of Merdeka Malang, November 15, 2025

<https://jurnal.unmer.ac.id/index.php/icgss>

- Kaseger, T. (2017). *Tindak Pidana Korupsi: Penyalahgunaan Wewenang oleh Penyelenggara Negara*, Sinar Grafika, Jakarta.
- Kasman, M. (2025). Tuduhan Pelanggaran Wewenang dalam Kasus Koupsi Tom Lembong: Perspektif Hukum, *Locus Journal of Academic Literature Review*, vol. 4 (3).
- Lamijan. (2022). *Korupsi dan Dampaknya terhadap Pembangunan Konomi Nasional*, Deepublish, Yogyakarta.
- Library, B. (2025). Hakim Praperadilan Tom Lembong: Kerugian Negara Tak Harus Ditentukan BPKP. BPK. [Online]. Available: <https://library.bpk.go.id/pathfinder/files/webservices/jkpkbpkpp-dl-20241211101956.pdf>.
- Moleong, L. J. (2019). *Metodologi Penelitian Kualitatif*, Remaja Rosdakarya, Bandung.
- Mallarangeng, A., Mustaari, Firman, & Ali, I. (2023). Pembuktian Unsur Niat Dikaitkan dengan Unsur Mens Rea dalam Tindak Pidana Korupsi. *Legal Journal of Law*, 2(2), 11-24.
- Munandar A., Wirda, W., Rusbandi, A., Zuhendra, M., Bahri, S., Fajri, D. (2024). Peran Niat (Mens Rea) dalam Pertanggungjawaban Pidana di Indonesia. *JIMMI: Jurnal Ilmiah Mahasiswa Multidisiplin*, 1(3), 240-252. <https://doi.org/10.71153/jimmi.v1i3.140>
- Nusantara, A. (2025). Analisis Hukum terhadap Tuduhan Korupsi Impor Gula pada Kasus Tom Lembong Politisasi atau Penegakan Hukum?. LK2 FHUI. [Online]. Available: <https://lk2fhui.law.ui.ac.id/portfolio/analisis-hukum-terhadap-tuduhan-korupsi-impor-gula-pada-kasus-tom-lembong-politisasi-atau-penegakan-hukum/>.
- Salam, H. (2025). Saksi Ahli Meringankan Kubu Tom Lembong Soroti Perhitungan Kerugian Keuangan Negara dari BPKP. Kompas. [Online]. Available: <https://www.kompas.id/artikel/saksi-ahli-meringankan-kubu-tom-lembong-soroti-perhitungan-kerugian-keuangan-negara-dari-bpkp>.
- Shahibah, A. (2025). Prabowo: Korupsi Ada di Setiap Eselon Birokrasi Kita, Ini Datanya. GoodStats. [Online]. Available: <https://data.goodstats.id/statistic/prabowo-korupsi-ada-di-setiap-eselon-birokrasi-kita-ini-datanya-ObiCb>.
- Sibarani, S. (2022). Tindak Pidana Kealpaan dalam Kecelakaan Lalu Lintas di Jalur Transjakarta. *Yure Humano*, 3(2), 74-88.
- Sidik, S. (2020). Ketok Palu, Ini Vonis Lengkap 6 Terdakwa Kasus Jiwasraya. CNBC Indonesia. [Online]. Available: <https://www.cnbcindonesia.com/market/20201027095538-17-197347/ketok-palu-ini-vonis-lengkap-6-terdakwa-kasus-jiwasraya>.
- Sutopo, R. & Panjaitan, H. (2025). A Juridical Demarcation: Reconstructing the Proof of Mens Rea to Differentiate Policy and Corruption by Public Officials. *SIGn Jurnal Hukum*, 7(2), 765-784. <https://doi.org/10.37276/sjh.v7i2.525>
- Syahuri, T. (2025). Diskresi Menteri Bukan Tipikor: Menyoroti Logika Hukum Putusan Tom Lembong. Hukum Online. [Online]. Available: <https://www.hukumonline.com/berita/a/diskresi-menteri-bukan-tipikor--menyoroti-logika-hukum-putusan-tom-lembong-lt68848bca67bce/?page=2>.



E-ISSN:
2721-13988

PROCEEDINGS OF THE INTERNATIONAL CONFERENCE OF GRADUATE
SCHOOL ON SUSTAINABILITY (ICGSS)

10th International Conference on Sustainability (ICoS10)

University of Merdeka Malang, November 15, 2025

<https://jurnal.unmer.ac.id/index.php/icgss>

- Syukur, K. (2015). Pembuktian Unsur Niat Dikaitkan dengan Unsur Mens Rea dalam Tindak Pidana Korupsi. *Jurnal Ilmiah Galuh Justisi*, 3(2), 218-228. <http://dx.doi.org/10.25157/jigj.v3i2.420>
- Tempo. (2025). Mahfud MD dan Novel Baswedan Kupas Putusan Hakim Kasus Tom Lembong. Tempo. [Online]. Available: <https://www.tempo.co/hukum/mahfud-md-dan-novel-baswedan-kupas-putusan-hakim-kasus-tom-lembong-2051033>.
- Wati, R. (2020). *Hukum Pidana: Suatu Pengantar*, Prenadamedia Group, Jakarta.
- Wicaksono, A. (2024). Mengenal Sejarah BLBI sebagai Bagian dari Skandal Terbesar Indonesia. Metro TV. [Online]. Available: (<https://www.metrotvnews.com/read/NQACq1n6-mengenal-sejarah-blbi-sebagai-bagian-dari-skandal-terbesar-indonesia>).