

CRIMINAL LAW ANALYSIS OF DRIVER NEGLIGENCE THAT RESULTS IN TRAFFIC ACCIDENTS AND DEATH VICTIMS (STUDY OF DECISION NUMBER 101/PID.SUS/2025/PN KIS)

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This study examines legal issues involving traffic accident, law enforcement, criminal law. It employs normative legal research with an empirical juridical approach and draws on interviews, statutory regulations, legal literature, official documents. The findings show that the applicable legal framework must be connected to the specific elements and facts of the case. Investigation or implementation also requires consistent documentary records, witness statements, relevant evidence, and procedural safeguards. The study highlights the need for accurate legal reasoning, coherent documentation, institutional coordination, and accountability. These findings support a more consistent application of Indonesian law concerning traffic accident, law enforcement.

Keywords: *Traffic Accident; Law Enforcement; Criminal Law*

1. Introduction

In criminal law, the rule of law is used to assess whether an act is a criminal act, who must be responsible, and the form of sanction that can be given if the act is proven to meet criminal elements (Moeljatno, 2008).

Therefore, if an accident occurs due to the driver's negligence, it is necessary to look at it from the perspective of criminal law to find out whether the negligence meets the elements of fault and can be held accountable to the driver (Harahap, 2016).

This risk can occur if drivers are not careful, do not maintain a safe distance, violate traffic signs, drive too fast, or do not pay attention to the condition of the road and other vehicles around them (Warpani, 2002).

In traffic, negligence can be seen from drivers who do not pay attention to the safety of other road users, are unable to control their vehicles properly, or do not comply with traffic rules that have been set in the law (Hiariej, 2016).

Law Number 22 of 2009 concerning Road Traffic and Transportation stipulates that every driver is obliged to drive a vehicle reasonably and with full concentration. This means that every driver must be careful, focused, and pay attention to the safety of other road users (Indonesia, 2009).

The determination of the driver's criminal liability cannot only be seen from the death of the victim, but must also be based on the facts of the trial, witness statements, evidence, visum et repertum, as well as the judge's consideration in assessing the elements of the driver's negligence (Soekanto, 1990).

This problem can be seen in the traffic accident case which was examined and decided by the Kisaran District Court in Decision Number 101/Pid. Based on the decision, the accident occurred on Monday, August 5, 2024 at around 11.30 WIB on the Tanjung Seri-Mekar Sari Public Road, precisely in Mangga 10 Hamlet, Mekar Sari Village, Laut Tador District, Batu Bara Regency.

Based on the legal facts in Decision Number 101/Pid. Sus/2025/PN Kis, the accident involved a unit of Dump Truck Goods Car Police Number BK 8912 YI driven by the defendant Misliadi with a female pedestrian whose identity is unknown and suspected to be a Person with Mental Disorders.

From the description in Decision Number 101/Pid. In this case, the provision used is Article 310 paragraph (4) of Law Number 22 of 2009 concerning Road Traffic and Transportation, which concerns the driver of a motor vehicle whose negligence resulted in a traffic accident with the deceased (Indonesia, 2009).

This study focuses on three issues: legal regulation of driver negligence in traffic accidents that result in the death of victims based on decision number 101/pid.sus/2025/pn kis; the application of the element of negligence by the investigators of the Batu Bara Police Patrol in proving the case of a traffic accident that resulted in the victim's death; The judge's consideration in imposing a criminal penalty on the driver in Decision Number 101/pid.sus/2025/PN KIS.

2. Methodology

2.1. Research Methodology

The selection of this location is based on the relevance of the Batu Bara Police as a police institution that handles consecutive traffic accident cases that resulted in the death of the victim in its jurisdiction. In addition, the Batu Bara Police, especially the Traffic Unit, has the authority to receive police reports, process the crime scene, examine witnesses and suspects, secure evidence, compile accident sketches, and build a construction of proof against the elements of driver negligence.

Normative legal research is carried out by examining primary and secondary legal materials related to the crime of traffic accidents, driver negligence, deceased victims, criminal liability, and criminal law provisions in Law Number 22 of 2009 concerning Road Traffic and Transportation. This combination of approaches allows for an analysis that focuses not only on written norms, but also on the investigation of traffic accidents. This research is also directed to analyze how the chronology of accidents is built in the case file, how the form of driver negligence is proven by investigators, how the causal relationship between driver negligence and the death of the victim, and how the driver's criminal liability is applied based on Law Number 22 of 2009 concerning Road Traffic and Transportation (Marzuki, 2005; Scott, 2015; Arikunto, 2006).

The interview was conducted to explore information about the chronology of the accident, the process of processing the crime scene, the form of driver negligence, the application of articles against the driver, the process of proving criminal elements, the causal relationship between negligence and the death of the victim, and the obstacles faced by investigators in handling consecutive traffic accident cases at the Batu Bara Police Station.

The primary legal materials used in this study include laws and regulations and official documents relevant to the crime of consecutive traffic accidents that resulted in the death of the victim.

2.2. Theoretical Foundations

Therefore, the analysis of traffic crimes must pay attention to the elements of negligence, the consequences caused, and the causal relationship between the actions of the driver and the victim (Ali, 2019).

This definition is the basis for assessing whether the driver's actions in the case handled by the Batu Bara Police meet the elements of traffic crimes based on criminal law and the Road Traffic and Transportation Law (Panjaitan, 2022).

In traffic accidents that cause deaths, the relevant formulation is contained in Law Number 22 of 2009 concerning Road Traffic and Transportation (Indonesia, 2009).

These elements are the basis for assessing criminal liability in consecutive traffic accidents handled by the Batu Bara Police.

Therefore, the relationship between negligence and consequences must be clearly proven (Remmelink, 2003).

This classification is important to understand the legal position of consecutive traffic accidents that resulted in the death of the victim at the Batu Bara Police Station.

Not all traffic accidents automatically become criminal offenses, because it must first be proven that there are elements of negligence, consequences, and causal relationships between the driver's actions and the consequences that occur (Soekanto, 1990).

In this context, criminal law not only looks at the occurrence of an accident, but also assesses whether the driver acted negligently, whether his negligence can be blamed, and whether the result of the victim's death was a direct result of the negligence (Arief, 2014).

The case file shows that there were deaths, injuries, and vehicle damage. This condition confirms that the traffic crime in the case must be analyzed based on the elements of negligence and the consequences caused (Panjaitan, 2022).

The study of this criminal act is the basis for assessing the application of criminal law to consecutive traffic accident cases at the Batu Bara Police Station.

If the accident results in the death of another person, the provisions of Article 310 paragraph (4) (Indonesia, 2009) apply.

In the case of a serious accident, the investigator must prove the existence of negligence and a causal relationship between the driver's actions and the consequences that occurred.⁴⁰

This type of accident requires more complex proof because investigators must determine the series of collisions, vehicle positions, and negligent drivers.

2.3. Legal Arrangements and Key Concepts

In criminal law, negligence is a form of error that can give rise to liability if it results in loss or loss of life (Moeljatno, 2008).

If this standard is ignored, then the driver can be considered negligent (Indonesia, 2009).

This understanding is the basis for assessing the driver's actions in accident cases handled by the Batu Bara Police Task Force.

The legal basis for driver negligence in traffic is contained in Law Number 22 of 2009 concerning Road Traffic and Transportation (Indonesia, 2009).

Article 106 paragraph (1) of Law Number 22 of 2009 states that every person who drives a motor vehicle on the road is obliged to drive his vehicle reasonably and with full concentration (Indonesia, 2009).

The negligence of the driver that causes a traffic accident with serious injuries is regulated in Article 310 paragraph (3) of Law Number 22 of 2009 (Indonesia, 2009).

If the driver's negligence results in the death of another person, the legal basis used is Article 310 paragraph (4) of Law Number 22 of 2009 (Indonesia, 2009).

Thus, the legal basis for driver negligence in this study rests on Article 106 paragraph (1), Article 310 paragraph (3), and Article 310 paragraph (4) of Law Number 22 of 2009.

In traffic, the obligation to be careful is inherent in every driver because the vehicle he drives can pose a risk to the safety of road users (Prasetyo, 2016).

The heavier the consequences caused, the more serious the criminal liability that can be imposed on drivers who are proven negligent (Indonesia, 2009).

These elements became the basis for the analysis of the consecutive traffic accident cases at the Batu Bara Police Station.

The first form of driver negligence is not maintaining concentration when driving a vehicle. If the driver loses concentration, the risk of accidents will be greater (Indonesia, 2009).

These forms are important for assessing the actions of drivers in consecutive traffic accidents handled by the Batu Bara Police.

2.4. Parameters of Juridical Analysis

In the context of drivers, traffic violations usually occur when a person does not obey signs, road markings, speed limits, the obligation to carry vehicle documents, or does not drive the vehicle reasonably and carefully (Panjaitan, 2022).

Traffic violations don't necessarily lead to accidents, but they can increase the risk of accidents. Therefore, traffic violations need to be understood as a form of behavior that deviates from traffic safety standards (Fatimah, 2019).

If these obligations are not carried out, then the driver can be considered to have committed a traffic violation (Indonesia, 2009).

In research on traffic accidents, discussions about traffic violations are important because they can help explain whether the accident occurred due to the driver's negligence or due to other factors beyond the driver's control.

Therefore, violations of this obligation can be the basis for assessing the negligence of drivers (Indonesia, 2009).

In the event that a traffic accident occurs due to the negligence of the driver, the most commonly used legal basis is Article 310 of Law Number 22 of 2009 (Indonesia, 2009).

The provisions in the new Criminal Code can be a general reference regarding negligence, while in the case of traffic accidents, the LLAJ Law remains a special rule because it directly regulates the actions of drivers on the road (Indonesia).

Road signs and markings are made not only to regulate the flow of vehicles, but also to maintain the safety of all road users (Waluyo, 2021).

Therefore, drivers who do not pay attention to the presence of pedestrians can be considered not carrying out their duty of caution (Formil, 2022).

If the vehicle is not roadworthy and is still forced to be used, then it can be one of the factors causing accidents (Santoso, 2023).

In traffic, the obligation to be careful is very important because small mistakes can cause casualties (Mulyadi, 2021).

If the driver is not careful and the accident occurs and causes casualties, then the violation can be the basis for assessing criminal liability (Kusuma, 2024).

Traffic violations need to be linked to the facts of the verdict, especially regarding the way the defendant drove the vehicle, road conditions, the position of the victim, evidence, and the judge's consideration in determining whether the element of negligence has been proven (Yusuf, 2024; Kusmagi, 2010).

3. Research Results

3.1. Legal Regulation on Driver Negligence in Traffic Accidents Resulting in the Death of the Victim Based on Decision Number 101/Pid.Sus/2025/PN Kis

The legal regulation of driver negligence in traffic accidents that resulted in the death of the victim basically cannot be separated from the existence of Law Number 22 of 2009 concerning Road Traffic and Transportation. In Decision Number 101/Pid (Indonesia, 2009).

In this case, the defendant named Misliadi was charged with driving a motor vehicle in the form of a dump truck with Police Number BK 8912 YI which due to his negligence resulted in a traffic accident and the victim died. Thus, the negligence aspect is an important basis for determining whether or not there is criminal liability against the driver.

The legal regulation of driver negligence in this case also shows that traffic crimes are material delicacies. In Decision Number 101/Pid.

In addition to Article 310 paragraph (4), this decision also alludes to Article 235 paragraph (1) of Law Number 22 of 2009. This arrangement shows that social responsibility or assistance to victims does not necessarily eliminate criminal proceedings (Indonesia, 2009).

When viewed from the normative aspect, Article 310 paragraph (4) of Law Number 22 of 2009 provides a limitation that the act that is criminalized is the act of driving a motor vehicle which due to negligence causes an accident with the victim died (Marpaung, 2012).

In an interview on June 1, 2026, Chief Judge Yanti Suryani, S.H., M.H. said that legal arrangements for traffic accidents that result in the death of victims must be understood as a form of protection for human life (Sinurat, 2026).

Thus, the legal regulation of driver negligence in this case is not only normative, but also applicable in court decisions. The norm of Article 310 paragraph (4) is used as the basis for the indictment, then tested through the facts of the trial, evidence, witness statements, expert statements, and the defendant's statement.

Based on this discussion, it can be understood that the legal regulation of driver negligence in a traffic accident that resulted in the death of the victim in Decision Number 101/Pid. Sus/2025/PN Kis is applied through Article 310 paragraph (4) of Law Number 22 of 2009.

3.2. Application of Elements of Negligence by Coal Police Satlantas Investigators in Proving Traffic Accident Cases That Resulted in the Death of Victims

The application of the element of negligence by investigators in traffic accident cases that resulted in the death of the victim is a very important part of the criminal law enforcement process (Indonesia, 2009).

In the case of Decision Number 101/Pid. Sus/2025/PN Kis, the process of proving the element of negligence began with a traffic accident between a Dump Truck Goods Car Police Number BK 8912 YI driven by the defendant Misliadi and a pedestrian.

Based on the results of an interview with AKP Simon E. Simatupang, S.H., M.H. on June 2, 2026, it is known that the first step taken by the investigators of the Batu Bara Police Task Force when receiving a report of a traffic accident was to visit the scene of the case (Sinurat, 2026).

In the investigation of traffic cases, the relationship between the driver's actions and the consequences that arise must be clearly proven. In this case, the relationship was built through witness statements, defendants' statements, medical examination results, and vehicle evidence (Soesilo, 2016).

According to AKP Simon E. Simatupang, S.H., M.H., a medical examination is very necessary in the case of a traffic accident that results in the death of the victim because investigators need objective medical information (Sinurat, 2026).

In this case, the victim is an adult woman whose identity is unknown and is suspected of being ODGJ. Nevertheless, the law still provides protection for victims as human beings and road users.

The application of the element of negligence by the investigators of the Batu Bara Police Task Force in this case was ultimately directed to prove Article 310 paragraph (4) of Law Number 22 of 2009 (Indonesia, 2009).

In the case of Decision Number 101/Pid. Sus/2025/PN Kis, the results of the investigation carried out then became the basis for the Public Prosecutor to prepare a single indictment against the defendant.

Based on this discussion, it can be concluded that the investigators of the Batu Bara Police Satlantas applied the element of negligence by collecting evidence thoroughly, starting from the processing of the crime scene, witness statements, defendant statements, vehicle evidence, driver's licenses and vehicle registrations, and Visum et Repertum.

3.3. Judge's Considerations in Imposing Criminal Charges against Drivers in Decision Number 101/Pid.Sus/2025/PN Kis

The judge's consideration in imposing a sentence is an important part of a criminal verdict because through these considerations it can be seen the legal reasons why the defendant was found guilty and a certain crime was imposed. In Decision Number 101/Pid.

This case was examined based on the single indictment of the Public Prosecutor, namely Article 310 paragraph (4) of Law Number 22 of 2009 concerning Road Traffic and Transportation. The indictment places the defendant Misliadi as the driver of a motor vehicle which due to his negligence caused a traffic accident with the victim dying.

Based on the results of an interview with Presiding Judge Yanti Suryani, S.H., M.H. on June 1, 2026, it was obtained that the judge's consideration in the traffic negligence case did not only rely on the consequences of the victim's death (Sinurat, 2026).

The judge's consideration was also based on Visum et Repertum Corpse Number 445/2836/VER/RRSUD-BB/III/2022 dated August 5, 2024. This medical evidence is important because it strengthens that the victim was indeed injured due to a traffic accident that then led to death.

Dr. Bane Uras Sagala's expert testimony was also part of the judge's consideration. The expert also explained that the injuries found on the victim's body were related to the traffic accident experienced by the victim.

In an interview on June 1, 2026, Chief Judge Yanti Suryani, S.H., M.H. explained that medical evidence such as visum is very important in traffic accident cases that cause the victim's death (Dakhi, 2026).

In an interview on June 1, 2026, Chief Judge Yanti Suryani, S.H., M.H. explained that the victim's status as a person suspected of having a mental disorder does not eliminate legal protection for victims (Dakhi, 2026).

The 4-month prison sentence imposed on the defendant can be understood as a form of criminal responsibility for negligence that resulted in the victim's death. Thus, the judge's consideration is proportional between the aspects of the offense, consequences, and circumstances of the defendant (Indonesia, 2009).

In an interview on June 1, 2026, Presiding Judge Yanti Suryani, S.H., M.H. explained that the purpose of punishment in traffic negligence cases is not solely to punish the defendant, but also to provide a message of caution to the public, especially motor vehicle drivers (Sinurat, 2026).

Based on this description, it can be concluded that the judge's consideration in imposing a criminal sentence on the defendant in Decision Number 101/Pid. The judge then sentenced the defendant to 4 months in prison as a form of accountability for the negligence of driving a motor vehicle that caused a traffic accident with the victim dying.

4. Discussion

4.1. Analysis of Legal Arrangements for Driver Negligence in Traffic Accidents That Result in the Death of the Victim Based on Decision Number 101/Pid.Sus/2025/PN Kis

In criminal law, negligence or culpa is a form of mistake that is different from intentionality. If the duty of care is neglected to cause an accident that results in the death of another person, then the driver can be held criminally liable (Moeljatno, 2008).

The regulation in Article 310 paragraph (4) of Law Number 22 of 2009 stipulates that every person who drives a motor vehicle due to his negligence resulting in a traffic accident that results in the death of another person can be punished (Indonesia, 2009).

The regulation of criminal law against negligence in traffic not only pays attention to the driver's actions, but also pays attention to the consequences caused. This result is the basis for the implementation of Article 310 paragraph (4) of Law Number 22 of 2009 (Indonesia, 2009).

Based on Visum et Repertum Corpse Number 445/2836/VER/RRSUD-BB/III/2022 dated August 5, 2024, the victim suffered several injuries, including lacerations, abrasions, bruises, cuts to the pelvis, wounds to the palms, and bruises on certain parts of the body.

In an interview with Chief Judge Yanti Suryani, S.H., M.H. on June 1, 2026, it was explained that the legal regulation of driver negligence in this case was seen from the fulfillment of the elements of Article 310 paragraph (4) of Law Number 22 of 2009 (Dakhi, 2026).

In this case, even though the vehicle was running at a low speed, the consequences were still serious because the victim died (Sinurat, 2026).

In traffic law, pedestrians are still road users whose safety must be considered. Therefore, the victim's status as a person suspected of having a mental disorder cannot be used as a reason to eliminate the defendant's criminal responsibility (Indonesia, 2009).

The power of Decision Number 101/Pid. Sus/2025/PN Kis also lies in how the judge relates the facts of the trial to the elements of the article charged.

4.2. Analysis of the Application of Negligence Elements by Coal Police Satlantas Investigators in Proving Traffic Accident Cases That Resulted in the Death of Victims

In this case, witness Rohmah's testimony is one of the important parts because the witness is quite close to the scene and knows the victim's whereabouts before the accident occurred (Sinurat, 2026).

Witness Suprianto found out about the incident after receiving information from the village head, then went to the scene of the crime and saw that the victim was already in the yard of the witness Rohmah's house.

If the vehicle has to reverse or turn in a narrow space, the driver should ask for the help of others to give a warning so as not to endanger other road users (Dakhi, 2026).

The expert testimony is complementary to the visum because it provides a direct explanation of the victim's condition based on a medical examination.

However, owning a driver's license does not necessarily eliminate the possibility of negligence in driving. Thus, the investigator still assesses the concrete actions of the driver at the time of the incident, not just the formal status of SIM ownership (Indonesia, 2009).

If these preventive measures are not carried out or are not done enough, then it can strengthen the suspicion of negligence (Indonesia, 2009).

In such circumstances, investigators must corroborate the evidence through processing the crime scene, vehicle position, accident marks, statements from local residents, and the results of medical examinations (Sinurat, 2026).

Investigators also paid attention to the defendant's actions after the accident occurred. In the verdict, it was stated that the defendant got out of the vehicle, helped the victim, contacted the village head and hamlet head, and asked for ambulance assistance.

However, this cooperative attitude does not mean that the case is automatically closed, especially if the accident has resulted in the death of the victim (Sinurat, 2026).

4.3. Analysis of Judges' Considerations in Imposing Penalties on Drivers in Decision Number 101/Pid.Sus/2025/PN Kis

With the fulfillment of this element, the judge then continued the examination of the elements of the act and consequences in the traffic accident case (Moeljatno, 2008).

In assessing the element of negligence, the judge paid attention to the way the defendant drove the vehicle before the accident occurred. This situation is the basis for the judge to assess the lack of caution from the defendant.

Therefore, when maneuvering on narrow roads and intersections, the defendant should pay more attention to the surrounding conditions so as not to endanger pedestrians or other road users (Hamzah, 2017).

Suprianto's witness statement was also considered by the judge. The witness saw that the victim was already in the yard of the witness Rohmah's house and then helped take the victim to a health facility.

If the driver who has a driver's license is still negligent and causes an accident with the victim dying, then the driver can still be held criminally liable (Indonesia, 2009).

This consideration is based on the suitability of witness statements, defendants' statements, expert statements, visum, and evidence.

In this case, the evidence submitted at trial was consistent so as to form the judge's belief that the defendant committed the crime of traffic negligence as stipulated in Article 310 paragraph (4) of Law Number 22 of 2009 (Indonesia, 1981).

The judge still sees that the victim is a road user who must be protected, while the defendant as a driver has an obligation to be more careful (Indonesia, 2009).

The interests of the defendant can be seen from the consideration that the defendant has never been convicted and the sentence was imposed lower than the charge. Meanwhile, the interests of the community can be seen from the message that every driver must be careful in traffic (Arief, 2010).

5. Conclusion

The legal regulation of driver negligence in a traffic accident that resulted in the death of the victim based on Decision Number 101/Pid.Sus/2025/PN Kis is regulated in Article 310 paragraph (4) of Law Number 22 of 2009 concerning Road Traffic and Transportation. In this case, the defendant Misliadi is considered to have fulfilled the elements as every person who drives a motor vehicle and because of his negligence resulted in a traffic accident with the victim dying. This negligence can be seen from the defendant's actions who drove a dump truck while maneuvering around the intersection, but did not pay attention to the conditions around the vehicle, especially on the left and rear of the vehicle. Thus, the legal arrangement in this case confirms that the driver can still be held criminally liable even if he does not have the intention to harm the victim, as long as his negligence is proven to have caused the death of another person.

Investigators from the Batu Bara Police Task Force applied the element of negligence in proving the case of a traffic accident that resulted in the victim's death by collecting and connecting evidence thoroughly. Proof was carried out through an examination of the crime scene, witness statements, defendants' statements, vehicle evidence, driver's licenses, vehicle registrations, and the victim's Visum et Repertum. Based on the results of an interview with AKP Simon E. Simatupang, S.H., M.H. on June 2, 2026, the element of negligence is not only seen from the speed of the vehicle, but also from the driver's vigilance in controlling vehicles, especially large vehicles such as dump trucks. In this case, the defendant's negligence was seen because the defendant only found out about the victim after the vehicle he was driving hit something, thus showing that the defendant was not careful in ensuring that the area around the vehicle was safe.

The judge's consideration in imposing a criminal sentence on the driver in Decision Number 101/Pid.Sus/2025/PN Kis is based on the fulfillment of the elements of Article 310 paragraph (4) of Law Number 22 of 2009, the suitability of evidence, witness statements, expert statements, defendants' statements, visum, and evidence submitted in the trial. The judge also considered that there was no justification or excuse that could remove the defendant's criminal liability. In imposing a sentence, the judge considers the aggravating circumstances, namely the defendant's actions resulting in the victim's death, as well as mitigating circumstances, namely that the defendant has never been convicted. Therefore, the judge sentenced the defendant to 4 months in prison, lighter than the Public Prosecutor's demand for 5 months, as a form of criminal liability for the defendant's negligence.

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References

- (1) Ali, Mahrus. Dasar-Dasar Hukum Pidana. Jakarta: Sinar Grafika, 2019.
- (2) Arief, Barda Nawawi dan Muladi. Teori-Teori dan Kebijakan Pidana. Bandung: Alumni, 2010.
- (3) Arief, Barda Nawawi. Masalah Penegakan Hukum dan Kebijakan Hukum Pidana dalam Penanggulangan Kejahatan. Jakarta: Kencana, 2014.
- (4) Arikunto, Suharsimi. Prosedur Penelitian Suatu Pendekatan Praktik. Edisi Revisi. Jakarta: Rineka Cipta, 2006.
- (5) Dakhi, Indahwati, Daniel Ginting, Janno Sinaga, Donal Nababan, dan Rinawati Sembiring. "Analisis Faktor Penyebab Kekerasan terhadap Perempuan di Kabupaten Nias Selatan." PREPOTIF: Jurnal Kesehatan Masyarakat 10, no. 1 (2026): 1617-1622.
- (6) Fatimah, Siti. Pengantar Transportasi. Ponorogo: Myria Publisher, 2019.
- (7) Hamzah, Andi. Asas-Asas Hukum Pidana. Jakarta: Rineka Cipta, 2017.
- (8) Harahap, M. Yahya. Pembahasan Permasalahan dan Penerapan KUHAP Penyidikan dan Penuntutan. Jakarta: Sinar Grafika, 2016.
- (9) Hiariej, Eddy O.S. Prinsip-Prinsip Hukum Pidana. Yogyakarta: Cahaya Atma Pustaka, 2016.
- (10) _____. Hukum Pidana Materiil dan Formil. Jakarta: Kencana, 2022.
- (11) Kitab Undang-Undang Hukum Pidana.
- (12) Kusmagi, Marye Agung. Selamat Berkendara di Jalan Raya. Jakarta: PT Niaga Swadaya, 2010.
- (13) Kusuma, Wisnu Wardana dan Dede Amirudin. Hukum Lalu Lintas dan Angkutan Jalan: Suatu Pengantar dan Kritik. Jakarta: Pustaka Aksara, 2024.
- (14) Marpaung, Leden. Asas Teori Praktik Hukum Pidana. Jakarta: Sinar Grafika, 2012.
- (15) Marzuki, Peter Mahmud. Penelitian Hukum. Surabaya: Prenada Media Group, 2005.
- (16) Moeljatno. Asas-Asas Hukum Pidana. Jakarta: Rineka Cipta, 2008.
- (17) Mulyadi, Lilik. Hukum Acara Pidana: Normatif, Teoretis, Praktik dan Permasalahannya. Bandung: Alumni, 2021.
- (18) Panjaitan, Sarbudin. Tanggung Jawab Pidana dan Perdata Kasus Kecelakaan Lalu Lintas di Jalan: dalam Teori dan Praktik. Bandung: Mega Press Nusantara, 2022.
- (19) Prasetyo, Teguh. Hukum Pidana. Jakarta: RajaGrafindo Persada, 2016.
- (20) Remmelink, Jan. Hukum Pidana: Komentar atas Pasal-Pasal Terpenting dari KUHP Belanda dan Padanannya dalam KUHP Indonesia. Jakarta: Gramedia Pustaka Utama, 2003.
- (21) Santoso, Topo. Asas-Asas Hukum Pidana. Depok: Rajawali Pers, 2023.
- (22) Sinurat, Patar Marojahan, Janpatar Simamora, dan Jusnizar Sinaga. "Analisis Yuridis Terhadap Pelaku Tindak Pidana Kecelakaan Lalu Lintas Akibat Kelalaian yang Mengakibatkan Kematian (Studi Putusan Nomor: 51/Pid.Sus/2024 PN Bpp)." Jurnal Ilmu Hukum, Humaniora dan Politik 6, no. 3 (2026): 1787-1790.
- (23) Soekanto, Soerjono. Polisi dan Lalu Lintas. Bandung: Mandar Maju, 1990.
- (24) Soesilo, R. Kitab Undang-Undang Hukum Acara Pidana serta Komentar-Komentarnya Lengkap Pasal Demi Pasal. Bogor: Politeia, 2016.
- (25) Sunggono, Bambang. Metodologi Penelitian Hukum. Jakarta: RajaGrafindo Persada, 2015.
- (26) Undang-Undang Nomor 22 Tahun 2009 tentang Lalu Lintas dan Angkutan Jalan.
- (27) Undang-Undang Nomor 8 Tahun 1981 tentang Hukum Acara Pidana.

- (28) Waluyo, Bambang. Penyidikan dan Penuntutan dalam Perkara Pidana. Jakarta: Sinar Grafika, 2021.
- (29) Warpani. Pengelolaan Lalu Lintas dan Angkutan Jalan. Bandung: ITB, 2002.
- (30) Yusuf, M. Pertanggungjawaban Pidana terhadap Pelaku Tindak Pidana Kelalaian Lalu Lintas yang Menyebabkan Orang. Guepedia, 2024.