

THE IMPLEMENTATION OF INVESTIGATION OF LOTTERY GAMBLING CRIMES AS AN ACT OF PROVIDING OPPORTUNITIES FOR GAMBLING GAMES BASED ON ARTICLE 426 OF THE CRIMINAL CODE (CASE STUDY AT LANGKAT POLICE)

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Abstract

This study examines legal issues involving criminal investigation, gambling, Langkat Resort Police. It employs normative legal research with an empirical juridical approach and draws on interviews, official examination reports (BAP), court decisions, statutory regulations, legal literature. 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 criminal investigation, gambling.

Keywords: criminal investigation; gambling; Langkat Resort Police; law enforcement; criminal law

1. Introduction

Andi Hamzah explained that in criminal acts involving more than one person, analysis of the role and contribution of each perpetrator is key in determining criminal liability (Hamzah, 2017).

The investigation stage has a central position in the criminal justice system because it is at this stage that search and collection of evidence are carried out to shed light on a criminal act and find the suspect as stipulated in Article 1 number 2 of the Criminal Procedure Code (KUHAP) (Indonesia; M, 2016).

Based on data released by the Langkat Police in 2025, throughout 2025 17 cases of gambling crimes have been revealed.

In the case of lottery gambling in the jurisdiction of the Langkat Police, based on the Witness Examination Report (BAP), the suspect was arrested on February 17, 2025 at a coffee shop in the Tanjung Pura area for allegedly receiving couple numbers from Hong Kong lottery gambling installers (Langkat Police, 2025).

However, in the criminal procedure law evidentiary system, the suspect's confession cannot stand alone as perfect evidence without the support of other valid evidence (Case document, 2025; Indonesia).

Article 184 paragraph (1) of the Criminal Code stipulates that valid evidence consists of witness statements, expert statements, letters, instructions, and statements of the defendant (Indonesia; Farid, 2016).

This is important to maintain the principle of legality as stipulated in Article 1 paragraph (1) of the Criminal Code which states that "No act can be punished, except based on the strength of the criminal rules in the laws that existed before the act was committed." (Moeljatno, 2018; Indonesia).

In this context, investigators are not only required to prove the existence of criminal acts, but also ensure that every investigative action is carried out in accordance with the criminal procedure law procedure procedure (Arief, 2016).

However, it is interesting to further examine how investigators build a legal construction of the role of suspects in the perspective of Article 426 of the Criminal Code, especially in distinguishing between the main perpetrators, the ancillaries, and the parties who obtain profits (Langkat Police, 2025).

This study focuses the analysis on three issues: the implementation of the investigation of lottery gambling crimes by the Langkat Police in the perspective of article 426 of the Criminal Code; the construction of the elements of "giving opportunities" and "participating" in article 426 of the Criminal Code against the role of the suspect as a recipient of a spouse/lottery clerk; obstacles and evidentiary efforts faced by investigators in building evidence of lottery gambling crimes.

2. Methodology

2.1. Research Methodology

The location of data collection in this study is at the Langkat Police, Jl. Proclamation No. 53, Kwala Bingai, Stabat, Langkat Regency, North Sumatra.

This combination of approaches allows for an analysis that focuses not only on written norms, but also on the implementation and construction of evidence in investigative practice (Marzuki, 2005; Scott, 2015; Arikunto, 2006).

The primary data source in this study was obtained through direct interviews with investigators from the Langkat Resort Police who handled lottery gambling criminal cases as stated in the Police Report Number: LP/A/03/II/2025/SPKT Reskrim/Langkat Police/North Sumatra Police.

The primary legal materials used in this study include laws and regulations relevant to the Criminal Code (KUHP). Some of the main regulations that this research focuses on are:

National Police of the Republic of Indonesia, North Sumatra Region, Langkat Resort, Minutes of Witness Examination in the Case of Hong Kong Lottery Gambling Crimes, Number: LP/A/03/II/2025/SPKT Reskrim/Langkat Police/North Sumatra Police, dated February 17, 2025

The secondary legal materials used are obtained from various scientific sources that can support the analysis in this study, such as: Books, Scientific journals, legal doctrine

The tertiary legal materials used in this study include sources that provide further understanding of the legal terms used in police regulations, as well as sources that confirm the general understanding of police procedures.

The field study was carried out through direct interviews with Langkat Police investigators who handled gambling crime cases (Marzuki, 2005).

2.2. Theoretical Foundations

The formulation emphasizes the existence of normative prohibitions and the threat of sanctions as a juridical consequence. Thus, an act cannot be punished if there is no provision that expressly prohibits it (Moeljatno, 2018).

The existence of criminal acts in the criminal law system cannot be separated from the principle of legality as stipulated in Article 1 paragraph (1) of the Criminal Code which states that "No act can be punished, except based on the strength of the criminal rules in the laws that existed before the act was committed." (Indonesia; Sudarto, 2014).

These elements are generally divided into objective elements and subjective elements. The fulfillment of these two elements is an absolute requirement in determining criminal liability (Farid, 2016).

These two elements must be proven cumulatively in the law enforcement process (Prasetyo, 2015).

Therefore, the analysis of the meaning and elements of criminal acts is an important theoretical foundation in examining the implementation of investigations into lottery gambling crimes from the perspective of Article 426 of the Criminal Code.

Therefore, investigators must be able to prove the existence of the perpetrator's awareness and will in committing the act (Rommelink, 2017).

Amir Ilyas emphasized that the construction of participation must be based on the real contribution of each perpetrator in the occurrence of criminal acts (Indonesia; Ilyas, 2016).

Investigators must not only prove the existence of acts that meet the elements of Article 426 of the Criminal Code, but also ensure the existence of mistakes and the ability to be responsible of the perpetrator.

In the context of Article 426 of the Criminal Code, grammatical interpretation is needed to understand phrases such as "giving an opportunity" or "participating" (Mertokusumo, 2014).

Thus, Article 426 of the Criminal Code must be understood within the framework of the criminal law system and the general principles that underlie it (Ali, 2017).

This is a consequence of the principle of legality as stipulated in Article 1 paragraph (1) of the Criminal Code (Indonesia; Adji, 2015).

Understanding this interpretation theory is important in analyzing the application of Article 426 of the Criminal Code at the investigation stage of lottery gambling crimes.

2.3. Legal Arrangements and Key Concepts

The regulation of gambling crimes in Indonesian criminal law is mainly contained in Article 426 of the Criminal Code (KUHP).

Normatively, Article 426 paragraph (1) of the Criminal Code contains several important elements, including the elements of "whom", "intentionally", as well as "offering or providing opportunities for gambling games" and "participating in gambling companies" (Maramis, 2017).

The meaning of "giving an opportunity" in the context of Article 426 of the Criminal Code refers to the act of providing means or conditions that allow others to gamble (Prodjodikoro, 2014).

This element becomes relevant in distinguishing between actors who are occasionally involved and actors who actively carry out gambling activities (R, 2014).

In addition to Article 426 of the Criminal Code, regulations regarding gambling are also contained in Article 303 bis of the Criminal Code which is a complementary provision.

On the contrary, Article 303 bis of the Criminal Code is more aimed at players or parties who also use gambling opportunities without having to be an organizer (P, 2016).

However, the criminal threat in Article 303 bis is lighter than Article 426 of the Criminal Code because the role of the perpetrator is considered not as heavy as the organizer (Efendi, 2015).

The difference in the nature of the crime between Article 426 and Article 303 bis of the Criminal Code also has implications for the construction of evidence in the investigation stage.

According to Wirjono Prodjodikoro, gambling in general develops in the form of a system that involves the division of roles for the smooth running of the practice (Prodjodikoro, 2014).

This pattern shows that there is an element of providing opportunities and facilitating gambling that is relevant to the formulation of Article 426 of the Criminal Code (Hamzah, 2017).

This speculative element is the main differentiator between gambling and legitimate economic activities (Soesilo, 2016).

Understanding the characteristics of lottery gambling is important in the investigation stage because it helps investigators identify the role and contribution of each party in the gambling network.

2.4. Parameters of Juridical Analysis

Investigators in gambling cases must be able to prove the existence of elements of Article 426 of the Criminal Code based on valid evidence.

The authority of investigators as stipulated in the Criminal Code is basically a form of delegation of state power in enforcing criminal law.

Investigators must ensure that every investigative action is directed at the collection of evidence that meets the provisions of Article 184 of the Criminal Procedure Code.

Therefore, the investigation of gambling crimes must be carried out systematically, starting from the receipt of reports, initial investigations, collection of evidence, examination of witnesses, to the determination of suspects (Indonesia).

In the investigation process, investigators need to first understand the elements of gambling as stipulated in Article 426 of Law of the Republic of Indonesia Number 1 of 2023 concerning the Criminal Code so that the direction of proof is not wrong.

This authority must be exercised based on the criminal procedure law so that the investigation process does not violate the rights of suspects and other related parties.

Without adequate evidence, investigators will have difficulty in proving that the act committed is really a gambling crime (Hamzah, 2019).

The examination of witnesses in the investigation of gambling crimes is necessary to explain the criminal event, the role of the suspect, the way gambling is carried out, and the parties involved.

In the investigation of gambling crimes, the arrest of the suspect can be carried out if there is sufficient preliminary evidence.

Confiscation must be carried out legally because evidence obtained through incorrect procedures can cause problems in proof.

A good investigation will make it easier for the public prosecutor to draft charges and assist the judge in assessing the guilt of the defendant at trial.

3. Research Results

3.1. Implementation of Investigation of Lottery Gambling Crimes by the Langkat Police in the Perspective of Article 426 of the Criminal Code

The implementation of the investigation of lottery gambling crimes by the Langkat Police basically began with public information about Hong Kong lottery gambling activities at one of the coffee shops on Jalan Bambu Runcing, Pekan Tanjung Pura Village, Tanjung Pura District, Langkat Regency (Langkat Police, 2025).

The investigator in the interview explained that the main focus of the investigation of this case was to prove the relationship between the suspect's actions and the element of providing opportunities in gambling (Langkat Police, 2025).

The implementation of the investigation by the Langkat Police in this case also shows that there is a pattern of handling repressive gambling crimes (Harahap, 2018).

The implementation of the investigation by the Langkat Police in the case of Leonardo Silalahi alias Ardo can be said to have gone through systematic stages, namely public information, investigation, arrest, confiscation of evidence, examination of witnesses, examination of suspects, and preparation of case files (Langkat Police, 2025).

According to M. Yahya Harahap, the investigation is a very decisive initial stage in the criminal justice process because it is at this stage that law enforcement officials seek and collect evidence to shed light on a criminal act and find the suspect (Harahap, 2018).

According to Romli Atmasasmita, the criminal justice system works through an integration of investigation, investigation, prosecution, court examination, and implementation of decisions (Atmasasmita, 2018).

According to P.A.F. Lamintang, in the criminal act of gambling, what needs to be considered is not only the act of gambling, but also the act of providing, facilitating, or giving opportunities to others to gamble (Lamintang, 2018).

According to Sudarto, criminal law is the last means of overcoming acts that are considered detrimental to society (Sudarto, 2017).

By paying attention to the opinions of these experts, the implementation of the investigation by the Langkat Police can be understood as a process that is not only technical, but also juridical and sociological (Soekanto, 2019).

Thus, the implementation of the investigation of lottery gambling crimes by the Langkat Police in the perspective of Article 426 of the Criminal Code shows that investigators are trying to prove the role of the suspect as a party who provides opportunities and participates in the gambling business (Langkat Police, 2025).

3.2. Construction of the Elements of "Giving Opportunities" and "Participating" in Article 426 of the Criminal Code on the Role of the Suspect as a Spouse/Lottery Clerk

The construction of the element of "giving opportunities" in Article 426 of the Criminal Code needs to be understood as an act that opens the way, provides facilities, or facilitates others to participate in gambling games.

The element of "giving a chance" became apparent when the suspect provided himself as a place for installers to deposit lottery numbers (Langkat Police, 2025).

Evidence in the form of paper containing couple numbers and pens is an important tool to construct the element of giving opportunities (Langkat Police, 2025).

In addition to paper and pens, cash of IDR 228,000 also strengthens the construction of the element to give opportunities (Langkat Police, 2025).

The construction of the element of providing opportunities can also be seen from the relationship between the suspect and the installers.

In the context of Article 426 of the Criminal Code, the element of providing opportunities and participating has a close relationship in the case of lottery clerks (Langkat Police, 2025).

According to P.A.F. Lamintang, in gambling offenses, criminal acts are not only limited to the act of playing gambling directly, but also include acts that provide space or facilities for others to gamble (Lamintang, 2018).

R. Soesilo explained that giving opportunities in gambling can be understood as the act of providing a road, place, tool, or intermediary that causes others to be able to gamble (Soesilo, 2016).

Based on the opinion of these experts, the elements of "giving opportunities" and "participating" in Article 426 of the Criminal Code can be applied to the role of the suspect as a recipient of a spouse or lottery clerk (Arief, 2017).

Thus, the role of Leonardo Silalahi alias Ardo as a spouse recipient or lottery clerk can be qualified as an act that fulfills the elements of giving opportunities and participating in Article 426 of the Criminal Code (Langkat Police, 2025).

3.3. Obstacles and Evidentiary Efforts Faced by Investigators in Building Evidence of Lottery Gambling Crimes

Proving the crime of gambling of the type of lottery has a different character from other conventional criminal acts (Langkat Police, 2025).

The second obstacle is the proof of the suspect's role as a lottery clerk (Harahap, 2018).

The second attempt is to confiscate evidence that has a direct relationship with the suspect's actions (Langkat Police, 2025).

The fourth effort is to examine the suspect in depth about how to play the lottery (Langkat Police, 2025).

The seventh attempt is to link the role of the suspect with the elements of Article 426 of the Criminal Code.

These limitations show that proving the criminal act of gambling of the type of lottery requires the development of a more in-depth investigation, especially against the network above the recipient of the couple (Langkat Police, 2025).

Therefore, the investigator's evidentiary efforts are directed to establish a logical relationship between the act, evidence, and criminal elements (Langkat Police, 2025).

According to Eddy O.S. Hiarij, evidence in criminal cases is not only about the existence of evidence, but also about how the evidence is interconnected to form belief in the occurrence of a criminal act (Hiarij, 2012).

Andi Hamzah argued that arrest in a state of arrest has an important position in criminal cases because the perpetrator is found when committing an act or immediately after the act is committed (Hamzah, 2019).

Thus, the main obstacle for investigators in building evidence of lottery gambling crimes is the difficulty of presenting installers, limited agent identities, and the need for careful proof of simple evidence such as number paper, pens, money, and mobile phones (Langkat Police, 2025).

4. Discussion

4.1. Analysis of the Implementation of the Investigation of Lottery Gambling Crimes by the Langkat Police in the Perspective of Article 426 of the Criminal Code

Therefore, investigators need to ensure that there are real acts that show gambling activities before taking further legal action (Hamzah, 2019).

In terms of Article 426 of the Criminal Code, the implementation of the investigation is directed to prove that the suspect is not only a player, but a party who gives opportunities to others to gamble.

In the perspective of Article 426 of the Criminal Code, the investigation process is not only looking for who the perpetrator is who gambles, but also who provides opportunities, means, or access for others to gamble (Soesilo, 2016).

Although the case in the BAP still includes Article 303 of the old Criminal Code, this study places the analysis in the perspective of Article 426 of the new Criminal Code.

In fact, Article 426 of the Criminal Code provides a more appropriate analysis of the suspect's role as a spouse recipient, because the element provides opportunities and can participate in reaching the position of lottery clerk (Hiarij, 2020).

Therefore, investigative actions before arrest are an important part of the investigation strategy (Langkat Police, 2025).

This pattern of proof is commonly used in cases of being caught, including lottery gambling crimes (Hamzah, 2019).

Therefore, the investigation of lottery clerks does not only target individuals, but also seeks to break the chain of gambling practices at the community level (Arief, 2017).

The suspect's confession that he knew gambling was illegal strengthened the element of error in the investigation (Moeljatno, 2018).

4.2. Construction Analysis of the Elements of "Providing Opportunities" and "Participating" in Article 426 of the Criminal Code on the Role of the Suspect as a Spouse/Lottery Clerk

According to investigators, the act of accepting a partner, recording the number, and waiting for the installer is enough to show that the suspect provides an opportunity for others to gamble, even though the suspect is not the main bookmaker in the gambling network (Langkat Police, 2025).

The construction of the element of "participation" in Article 426 of the Criminal Code has a wider scope than just the main perpetrator (Hiariej, 2020).

Thus, writers have a more active position and are closer to the element of giving opportunities and participating in gambling (Hamzah, 2019).

The suspect's confession does not stand alone, but is in accordance with witness statements and evidence (Langkat Police, 2025).

The application of Article 426 of the Criminal Code to lottery clerks also reflects the expansion of criminal liability against parties who take part in gambling businesses (Hiariej, 2020).

Moreover, the suspect knew that gambling was prohibited, but continued to carry out his role because he wanted to make a profit (Moeljatno, 2018).

Even though the suspect is not the main bookie, he still takes part in the gambling process because he receives a pair from the installer and forwards the recap to the agent (Hamzah, 2019).

Therefore, the application of Article 426 of the Criminal Code against lottery clerks is a form of law enforcement against parties who actually support the running of gambling businesses (Arief, 2017).

Sudarto is of the view that criminal acts must be understood based on the social function of the criminal prohibition itself (Sudarto, 2018).

4.3. Analysis of Obstacles and Evidentiary Efforts Faced by Investigators in Building Evidence of Lottery Type Gambling Crimes

To overcome this, investigators not only looked at the number records, but also linked them to cash, cellphones, witness statements, and the suspect's confession about how to play the lottery (Langkat Police, 2025).

This situation makes it difficult for investigators to develop cases against parties who are above the suspect in the lottery gambling network (Langkat Police, 2025).

Based on interviews with assistant investigators, one of the technical obstacles in lottery cases is that the perpetrator often deletes messages, changes the contact name, or does not keep the agent's identity completely (Langkat Police, 2025).

Although it looks simple, the evidence explains the suspect's operational function in gambling activities (Langkat Police, 2025).

This information has an important value because it is in accordance with the evidence found during the arrest (Langkat Police, 2025).

In this case, the suspect was found waiting for the installer and relevant evidence was found (Hamzah, 2019).

Therefore, investigators connect evidence with information about the way of playing, the value of the partner, prizes, profits, and relationships with agents (Langkat Police, 2025).

Investigators must be able to prove that the recording of numbers and receiving the money is part of a gambling game (Langkat Police, 2025).

In this case, the investigator must associate the evidence with the element of providing an opportunity and participating in Article 426 of the Criminal Code (Alfitra, 2018).

5. Conclusion

The implementation of the investigation of lottery gambling crimes by the Langkat Police is carried out through systematic stages, starting from public information, field investigations, arrests in a state of arrest, confiscation of evidence, examination of witnesses, examination of suspects, to the preparation of case files. In the case of Leonardo Silalahi alias Ardo, investigators obtained the fact that the suspect was arrested at a coffee shop on Jalan Bambu Runcing, Pekan Tanjung Pura Village, Tanjung Pura District, Langkat Regency, with evidence in the form of a mobile phone, paper containing a partner's number, pen, and cash. These facts show that the investigation is not only based on allegations, but on the circumstances of the arrest and evidence directly related to lottery gambling practices. In the perspective of Article 426 of the Criminal Code, the investigation is directed to prove that the suspect is not only a player, but also a party who gives opportunities to others to gamble and take part in gambling activities. This can be seen from the suspect's actions of receiving the couple's number, recording the number, collecting money, and reporting the recap to the agent. Thus, the implementation of the investigation by the Langkat Police has answered the need to prove criminal elements in Article 426 of the Criminal Code, especially the role of spouse recipients or lottery writers.

The construction of the element of "giving opportunities" in Article 426 of the Criminal Code is applied to the suspect because his role as the recipient of the spouse has opened access for other people to participate in the lottery game. The suspect not only knew of the existence of gambling, but actively received numbers from the installer, recorded numbers, received the couple's money, and provided himself as a liaison between the installer and the agent. Therefore, the suspect's actions fulfill the meaning of giving opportunities because without the role of a scribe, it will be more difficult for installers to participate in lottery games. Meanwhile, the element of "participating" was applied because the suspect took part in a series of gambling activities involving installers, writers, and agents. The suspect admitted that the couple's results were recap and reported to an agent who is usually called Ginting and profited from gambling turnover. This shows that the suspect is not just an ordinary player, but part of the operational structure of lottery gambling. Thus, the role of the suspect as a scribe can be qualified as an act of providing opportunities as well as participating in the gambling business as referred to in Article 426 of the Criminal Code.

The obstacles faced by investigators in building evidence of lottery gambling crimes mainly lie in the closed nature of gambling, the difficulty of presenting installers as witnesses, the limited identity of agents or bookmakers, and the need for careful proof of simple evidence such as number paper, pens, mobile phones, and cash. In this case, the suspect only called the agent by the nickname Ginting without knowing his exact address, so that the development of the case to the network above the suspect was limited. In addition, evidence such as number records and cash must be proven to be related to gambling activities, not just considered as ordinary objects. The efforts made by investigators are to build evidence through the relationship between the information of the arresting witness, the suspect's statement, evidence, and the circumstances of the arrest. Investigators linked the cellphone, the couple's number paper, pen, and cash with the information that the suspect received the partner, recorded the number, collected money, and reported the recap to the agent. In this way, investigators can compile evidence that supports each other to prove the elements of Article 426 of the Criminal Code, even though the development of agents or dealers is still an obstacle in the practice of investigation.

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References

- (1) Achmad Ali. Menguak Teori Hukum dan Teori Peradilan. Jakarta: Kencana, 2017.
- (2) Alfitra. Hukum Pembuktian dalam Beracara Pidana, Perdata, dan Korupsi di Indonesia. Jakarta: Raih Asa Sukses, 2018.
- (3) Amir Ilyas. Asas-Asas Hukum Pidana. Yogyakarta: Rangkang Education, 2016.
- (4) Andi Hamzah. Hukum Pidana Indonesia. Jakarta: Sinar Grafika, 2017.
- (5) Andi Zainal Abidin Farid. Hukum Pidana I. Jakarta: Sinar Grafika, 2016.
- (6) Arief, Barda Nawawi. Bunga Rampai Kebijakan Hukum Pidana. Jakarta: Kencana, 2017.
- (7) Atmasasmita, Romli. Sistem Peradilan Pidana Kontemporer. Jakarta: Kencana, 2018.
- (8) Bambang Sunggono. Metodologi Penelitian Hukum. Jakarta: RajaGrafindo Persada, 2015.
- (9) Barda Nawawi Arief. Bunga Rampai Kebijakan Hukum Pidana. Jakarta: Kencana, 2016.
- (10) Frans Maramis. Hukum Pidana Umum dan Tertulis di Indonesia. Jakarta: RajaGrafindo Persada, 2017.
- (11) Hamzah, Andi. Hukum Acara Pidana Indonesia. Jakarta: Sinar Grafika, 2019.
- (12) Hamzah, Andi. Hukum Pidana Indonesia. Jakarta: Sinar Grafika, 2019.
- (13) Harahap, M. Yahya. Pembahasan Permasalahan dan Penerapan KUHAP: Penyidikan dan Penuntutan. Jakarta: Sinar Grafika, 2018.
- (14) Hiariej, Eddy O.S. Prinsip-Prinsip Hukum Pidana. Yogyakarta: Cahaya Atma Pustaka, 2020.
- (15) Hiariej, Eddy O.S. Teori dan Hukum Pembuktian. Jakarta: Erlangga, 2012.
- (16) Ismu Gunadi dan Jonaedi Efendi. Cepat dan Mudah Memahami Hukum Pidana. Jakarta: Prenadamedia Group, 2015.
- (17) Jan Remmelink. Hukum Pidana: Komentar atas Pasal-Pasal KUHP. Jakarta: Gramedia Pustaka Utama, 2017.
- (18) Kepolisian Negara Republik Indonesia, Daerah Sumatera Utara, Resort Langkat. Berita Acara Pemeriksaan Saksi dalam Perkara Tindak Pidana Perjudian Jenis Togel Hongkong, Nomor: LP/A/03/II/2025/SPKT Reskrim/Polres Langkat/Polda Sumatera Utara, tanggal 17 Februari 2025.
- (19) Kepolisian Negara Republik Indonesia, Daerah Sumatera Utara, Resort Langkat. Berita Acara Pemeriksaan Tersangka Leonardo Silalahi Alias Ardo dalam Perkara Tindak Pidana Perjudian Jenis Togel Hongkong, tanggal 18 Februari 2025.
- (20) Kitab Undang-Undang Hukum Acara Pidana.
- (21) Kitab Undang-Undang Hukum Pidana.
- (22) Lamintang, P.A.F., dan Theo Lamintang. Delik-Delik Khusus Kejahatan Melanggar Norma Kesusilaan dan Norma Keputusan. Jakarta: Sinar Grafika, 2018.
- (23) M. Yahya Harahap. Pembahasan Permasalahan dan Penerapan KUHAP. Jakarta: Sinar Grafika, 2016.
- (24) Moeljatno. Asas-Asas Hukum Pidana. Jakarta: Rineka Cipta, 2018.
- (25) Oemar Seno Adji. Hukum Acara Pidana dalam Prospekti. Jakarta: Erlangga, 2015.
- (26) P.A.F. Lamintang dan Theo Lamintang. Kejahatan Terhadap Kepentingan Hukum Negara. Jakarta: Sinar Grafika, 2016.
- (27) Peter Mahmud Marzuki. Penelitian Hukum. Surabaya: Prenada Media Group, 2005.
- (28) R. Soesilo. Kitab Undang-Undang Hukum Pidana (KUHP) serta Komentar-Komentarnya Lengkap Pasal demi Pasal. Bogor: Politeia, 2014.
- (29) Soekanto, Soerjono. Faktor-Faktor yang Mempengaruhi Penegakan Hukum. Jakarta: Rajawali Pers, 2019.
- (30) Soesilo, R. Kitab Undang-Undang Hukum Pidana serta Komentar-Komentarnya Lengkap Pasal demi Pasal. Bogor: Politeia, 2016.
- (31) Sudarto. Hukum Pidana dan Perkembangan Masyarakat. Bandung: Sinar Baru, 2017.
- (32) Sudarto. Hukum Pidana I. Semarang: Yayasan Sudarto, 2018.

- (33) Sudarto. Kapita Selektta Hukum Pidana. Bandung: Alumni, 2014.
- (34) Sudikno Mertokusumo. Penemuan Hukum: Sebuah Pengantar. Yogyakarta: Cahaya Atma Pustaka, 2014.
- (35) Suharsimi Arikunto. Prosedur Penelitian Suatu Pendekatan Praktik. Edisi Revisi. Jakarta: Rineka Cipta, 2006.
- (36) Teguh Prasetyo. Kriminalisasi dalam Hukum Pidana. Bandung: Nusa Media, 2015.
- (37) Wirjono Prodjodikoro. Tindak-Tindak Pidana Tertentu di Indonesia. Bandung: Refika Aditama, 2014.