

JURIDICAL ANALYSIS OF THE CRIME OF FORGERY OF LETTERS AND MALICIOUS ASSISTANCE IN THE TRANSACTION OF BUYING AND SELLING CARS WITH FAKE DOCUMENTS AT THE LANGKAT POLICE STATION

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Abstract

This study examines legal issues involving document forgery, criminal assistance, Langkat Resort Police. It employs normative legal research with an empirical juridical approach and draws on interviews, 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 document forgery, criminal assistance

Keywords: document forgery; criminal assistance; Langkat Resort Police; law enforcement; criminal law

1. Introduction

Therefore, falsification of these documents not only harms certain individuals, but also disrupts legal certainty, trade traffic security, and public trust in official documents issued by the state (Hamzah, 2010).

The provisions regarding this matter are regulated in Article 263 paragraph (1) of the Criminal Code which states that whoever makes a false letter or forges a letter that can give rise to a right, engagement, debt exemption, or that is intended as evidence of something, with the intention of using or ordering others to use the letter as if it were true and not forged, can be punished if the use can cause loss.

This act is seen as a criminal act because it helps the proceeds of crime to be utilized, diverted, or hidden from the rightful owner (Lamintang, 2009).

In addition to the crime of forgery of letters, Indonesian criminal law also recognizes the crime of aiding and abetting or confiscation regulated in Article 480 of the Criminal Code.

Criminal liability is also increasingly relevant when a criminal act is committed jointly or with the involvement of several people who have different roles. In such a case, Article 55 paragraph (1) of the Criminal Code stipulates that those who are convicted as perpetrators of criminal acts are those who commit, who order to commit, and who participate in committing the act.

Theoretically, the crime of forgery of letters and illicit assistance have a close relationship because forgery of letters is often an instrument to legitimize the control or transfer of goods resulting from crime. This situation makes the crime of forgery of letters cannot be seen separately from the crime of malicious aid, because the two often appear in the same series of criminal events (_____, 2013).

The car was brought with BPKB and STNK documents that were allegedly fake, while the perpetrator tried to convince other parties that the vehicle belonged to him (Langkat Police, 2025).

This research focuses on three issues: legal regulation of the crime of forgery of letters and malicious assistance in the transaction of buying and selling cars with false documents according to Indonesian criminal law; the application of elements of the crime of forgery of letters and malicious assistance in the case of buying and selling cars with fake documents handled by the Langkat Police; Criminal Liability of the Parties involved in the transaction of buying and selling cars with false documents in the case handled by the Langkat Police.

2. Methodology

2.1. Research Methodology

The location of data collection in this study is at the Langkat Police Station which is located at Jl. The selection of the location of this study was based on the consideration that the case that was the object of study in this study, namely the crime of forgery of letters and malicious assistance in the transaction of buying and selling cars with fake documents, was handled by the Langkat Police.

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. Thus, this study aims to assess the conformity between legal norms and their implementation in criminal law enforcement (Marzuki, 2005; Scott, 2015; Chazawi, 2006).

In this study, the data sources used came from primary data and secondary data. Primary data in this study was obtained directly through interviews with investigators who handled cases of forgery of letters and malicious assistance in car buying and selling transactions with fake documents at the Langkat Police.

Meanwhile, the secondary data in this study is sourced from legal materials consisting of primary legal materials, secondary legal materials, and tertiary legal materials.

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:

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 data collection technique in this study was carried out through library research and field research. The field study was conducted through direct interviews with Langkat Police investigators who handled narcotics crime cases (Marzuki, 2005).

2.2. Theoretical Foundations

Thus, criminal acts are not only related to acts that are considered detrimental to society, but must also have a clear legal basis in laws and regulations (_____, 2017).

The term criminal act in criminal law literature is often also referred to as the term delicacy. Therefore, in academic practice and legal practice, the terms criminal and delinquency are often used interchangeably to describe an act that can be punished (Sofyan, 2016).

Thus, an act can be called a criminal act if there is a prohibition regulated in the law and accompanied by a criminal threat for the violator (Moeljatno, 2008).

Thus, criminal acts have certain elements that must be met so that a person can be held criminally accountable (_____, 2016).

In addition, criminal acts are also related to the existence of elements of guilt from the perpetrator. Thus, the existence of an element of guilt is one of the important requirements in determining whether a person can be held criminally liable or not (Saleh, 2017).

Therefore, the element of criminal acts is an important basis in determining the existence of mistakes and criminal liability of a person who is suspected of committing an unlawful act (Saleh, 2017).

This division aims to facilitate the analysis of a legal event so that it can be known whether the act meets the qualification as a criminal act or not (Poernomo, 2015).

Crime is an act that is considered very detrimental to society so that it is threatened with a heavier penalty, while violation is an act that is considered less serious but still violates the provisions of the law (Tresna, 2011).

Other classifications are general crimes and special crimes. The regulation of special crimes usually has more specific provisions because they are related to crimes that have certain characteristics (Purwoleksono, 2016).

This principle is the basis for assessing criminal liability in each case. The application of this principle is very relevant in traffic accident cases which are generally related to negligence (Huda, 2018).

The application of this principle can be seen in the investigation stage when the suspect is given the right to be accompanied by legal counsel. Thus, criminal liability cannot be separated from the principle of procedural justice (Harahap, 2015).

The theory of will (*wilstheorie*) states that intentionality is based on the will of the perpetrator to realize a certain result. These differences are important in determining the form of criminal liability (Moeljatno, 2008).

2.3. Legal Arrangements and Key Concepts

In Article 263 paragraph (2) of the Criminal Code, forgery of letters is distinguished from the use of forged letters. This distinction is important because the two can stand as different forms of action, although in practice they are often done in a series.

Forged letters must also have the potential to cause legal consequences or losses. This confirms that letter forgery is a crime that is very relevant to the development of social and economic life of the community which increasingly relies on the validity of documents (Soesilo, 1991).

The most common provision is Article 263 of the Criminal Code, which regulates two forms of acts, namely making a forged letter or forging a letter, and deliberately using a fake or forged letter as if it were genuine.

Article 264 of the Criminal Code regulates the form of qualified forgery of letters, namely the forgery of certain letters that are considered more important because of their nature and value, such as authentic deeds, government bonds, sero letters, dividend proofs, and credit or trade papers intended for circulation.

This element is very important in proof, because without a link to potential losses, forgery of letters cannot necessarily be punished under Article 263 of the Criminal Code (Soesilo, 1991).

In law enforcement practice, understanding the difference between Article 263, Article 264, and Article 266 of the Criminal Code is very important so that the application of the article is in accordance with the character of the act and the object of the letter that is the target of forgery (Sianturi, 1983).

This act is usually done by creating an entire document along with an identity, content, signature, stamp, or stamp that imitates the original letter. This form is commonly found in the forgery of identities, certificates, certificates, and motor vehicle documents (_____, 2013).

This action occurs when a person deliberately uses a forged letter or a forged letter as if it were true and genuine. Such use can be done to convince other parties, obtain rights, make transactions, avoid obligations, or obtain certain benefits.

The loss in question does not always have to be in the form of material losses directly, but can also be in the form of a loss of trust, administrative tipping tips, or legal proof. In this context, the use of fake letters is seen as dangerous as the act of forging the letter itself (Soesilo, 1991).

BPKB and STNK are used to prove the identity of the vehicle, owner data, registration number, validity period, and vehicle administration history. Therefore, if vehicle documents are falsified, what is attacked is not only vehicle administration, but also trust in motor vehicle transaction traffic (Indonesia, 2021).

The legal risk of using fake vehicle documents is very large because it can cause criminal liability on the basis of forgery of letters and the use of fake letters.

2.4. Parameters of Juridical Analysis

Thus, evil help can be understood as a form of follow-up action after the occurrence of the main crime (Soesilo, 1991).

Evil help is different from participating in committing criminal acts. However, his actions are still considered dangerous because they can help criminals enjoy the results of their actions (_____, 2015).

Normatively, evil help in the old Criminal Code is closely related to Article 480 of the Criminal Code regarding possession, which regulates the act of buying, renting, receiving pawns, receiving gifts, or withdrawing profits from objects that are known or suspected to be derived from crime.

In the new Criminal Code, the regulation regarding acts similar to addiction is also maintained.

This understanding is important so that there are no mistakes in distinguishing between the main perpetrators, the accomplices of the crime, and the perpetrators of the crime.

These items can be in the form of theft, embezzlement, fraud, or other criminal acts. Therefore, the origin of the goods is an important thing that must be proven in the case of malicious assistance (Chazawi, 2006).

For example, the price of the goods that is much cheaper than the normal price, the absence of proof of ownership, or the transaction is carried out behind closed doors can be an indication that the goods are suspected of coming from a criminal act (Rudiyanto, 2023).

It must be seen whether he knows or should suspect that the goods are of criminal origin. Thus, proof is not only directed at the deed, but also at the awareness and circumstances surrounding the deed (Moeljatno, 2008).

Therefore, investigators and judges must assess the facts carefully, especially regarding the origin of the goods, the way of obtaining the goods, and the relationship between the perpetrator and the original criminal act.

Therefore, criminal liability is always related to the existence of mistakes, both in the form of intentionality and certain negligence (Putra, 2021).

However, if the perpetrator does not know for sure but the circumstances should make him suspicious, then the element of "should suspect" can be used to assess the existence of a mistake (Sudarto, 1990).

If parties like this are not held accountable, the main crime will be easier to develop because the proceeds of the crime can still be used (Prasetyo, 2016).

With a criminal threat, a person is expected not to be easily tempted to buy cheap goods that turn out to be from a criminal act (Saputra, 2022).

3. Research Results

3.1. Legal Regulations on the Crime of Forgery of Letters and Malicious Assistance in Car Buying and Selling Transactions with False Documents According to Indonesian Criminal Law

Legal regulation of the crime of forgery of letters and malicious assistance in car buying and selling transactions with fake documents basically aims to maintain legal certainty in public legal relations (Hamzah, 2010).

The main element in Article 263 paragraph (1) of the Criminal Code is the act of making a false letter or forging a letter. In the case of buying and selling cars with fake documents, changes to the data on BPKB and STNK can be the basis for alleged letter forgery if proven to be done illegally (_____, 2013).

The next element in the crime of forgery of letters is the intention to use or tell others to use the letter as if it were true and not fake. This element shows that mail forgery is not only seen from the physical form of the document, but also from the purpose of its use (Moeljatno, 2008).

Article 263 paragraph (2) of the Criminal Code regulates the use of fake letters. This provision is important in the case of buying and selling cars because not everyone who carries or uses fake BPKB and STNK is a forged document maker.

In car buying and selling transactions, the indicator of "reasonable suspicion" can be seen from the price of the vehicle that is far below the market price. This situation became the basis for initial suspicion of the legality of the vehicle and its documents (Langkat Police, 2025).

In criminal law, malicious aid is different from forgery of letters, but both can arise in a single series of events. Therefore, investigators need to look at the relationship between fake documents, vehicles controlled, and parties who play a role in the transaction (Lamintang, 2009).

The crime of forgery of letters and evil help must also be analyzed based on the relationship between external acts and the inner attitude of the perpetrator. In evil help, the mental attitude can be in the form of knowledge or at least a proper conjecture that the goods come from evil (Moeljatno, 2008).

Thus, the legal regulation of the crime of forging letters and malicious assistance in the transaction of buying and selling cars with fake documents has a fairly clear basis in the Criminal Code (Langkat Police, 2025).

3.2. Application of Elements of Criminal Acts of Forgery of Letters and Malicious Assistance in the Case of Buying and Selling Cars with Fake Documents Handled by the Langkat Police

The application of elements of the crime of forgery of letters and malicious assistance in the case of buying and selling cars with fake documents handled by the Langkat Police must be seen from the series of events in its entirety.

The first element in the crime of forgery of letters is the existence of letters that are the object of forgery. Both documents have an important position because they are used to show the identity of the vehicle and vehicle ownership.

The next element in Article 263 of the Criminal Code is that the letter can give rise to rights or be used as evidence about a matter. Thus, the use of false documents in this case has the potential to give rise to illegal rights for certain parties (Soesilo, 1991).

Furthermore, the element of evil help in Article 480 of the Criminal Code needs to be seen from the act of receiving, selling, pawning, or taking advantage of goods that are known or reasonably suspected to be derived from crime.

The element of "known or reasonably suspected of originating from a crime" is an important element in Article 480 of the Criminal Code. These circumstances show that the

transaction does not run normally like buying and selling vehicles in general (Langkat Police, 2025).

In addition, the fact that Hamdan used Rizal Efendi's identity also strengthens the allegation that there is an attempt to disguise his identity. This can support the application of intentional elements in the use of false documents and suspicious elements in malicious assistance (Langkat Police, 2025).

The application of the element of letter forgery in this case can be concluded from the alleged use of BPKB and STNK that are not in accordance with the actual vehicle data.

Meanwhile, the application of the element of evil help can be seen from Hamdan's actions of helping to pawn or sell cars that do not belong to him, using documents that are allegedly fake, and expecting profits from the transaction.

Thus, the application of elements of the crime of forgery of letters and malicious assistance in the case of buying and selling cars with fake documents at the Langkat Police shows that there is a close relationship between fake documents, vehicle transactions, and the role of the parties (Langkat Police, 2025).

3.3. Criminal Liability of Parties Involved in Car Buying and Selling Transactions with False Documents in Cases Handled by the Langkat Police

The criminal liability of the parties in the transaction of buying and selling cars with false documents must be seen from the relationship between the acts, mistakes, and legal consequences caused (Moeljatno, 2008).

Criminal liability in this case is closely related to Article 263 of the Criminal Code concerning forgery of letters, Article 480 of the Criminal Code concerning malicious aid, and Article 55 of the Criminal Code concerning participation. Article 480 of the Criminal Code is used if there is an act of helping to divert or take advantage of goods that should be suspected of coming from crime.

In the Langkat Police case, the first party to appear in the transaction was Hamdan Afdawi. Based on the information in the BAP, Hamdan admitted that he wanted to pawn the car for IDR 130,000,000 (Langkat Police, 2025).

Hamdan Afdawi's criminal liability can be analyzed from his actions in bringing and showing BPKB and STNK which are allegedly fake.

The results of the interview with the investigator show that the role of the party who ordered it must be seriously investigated (Langkat Police, 2025).

In criminal law, the role of submitting documents cannot be considered trivial if the documents are used to commit criminal acts. Therefore, Ewin's accountability needs to be seen from his knowledge, intentions, and relationships with Dicky and Hamdan (Langkat Police, 2025).

In an interview on May 22, 2026, the investigator explained that criminal liability in this case cannot be evenly distributed to all parties. Therefore, investigators need to distinguish between witnesses, direct perpetrators, those who order, and those who help (Langkat Police, 2025).

Thus, the criminal liability of the parties in the case of buying and selling cars with false documents at the Langkat Police must be built based on proving their respective roles (Langkat Police, 2025).

4. Discussion

4.1. Analysis of Legal Arrangements for the Crime of Forgery of Letters and Malicious Assistance in Transactions of Buying and Selling Cars with Fake Documents According to Indonesian Criminal Law

Forgery of letters in Indonesian criminal law is regulated in Article 263 of the Criminal Code. This article basically regulates two forms of acts, namely making a forged letter or forging a letter, and using a forged letter or a forged letter as if it were true.

In addition to forging letters, this case is also related to the crime of malicious assistance or confiscation as stipulated in Article 480 of the Criminal Code.

If the goods resulting from crime can be easily sold, pawned, or transferred, then the main perpetrator will be more likely to profit from the crime. Therefore, Article 480 of the Criminal Code serves to break the chain of circulation of goods derived from crime (Soesilo, 1991).

In this case, the legal basis used is clear, namely Article 263 of the Criminal Code for forgery of letters, Article 480 of the Criminal Code for malicious aid, and Article 55 of the Criminal Code for participation (Moeljatno, 2008).

The results of the interview showed that investigators used a gradual evidentiary approach. This approach is important so that the alleged forgery of letters and malicious help does not only stand on assumptions, but is supported by interrelated evidence (Langkat Police, 2025).

In Article 263 of the Criminal Code, the use of fake letters that can cause losses is enough to be a criminal basis.

If it is proven that someone made or changed the document, then Article 263 paragraph (1) of the Criminal Code can be applied. If a person only uses fake documents, then Article 263 paragraph (2) of the Criminal Code can be considered.

Article 55 of the Criminal Code. Such a construction shows that investigators open up the possibility of several forms of accountability, depending on the results of the evidence regarding who forged, who used, and who assisted in the transaction (Langkat Police, 2025).

4.2. Analysis of the Application of Elements of Criminal Acts of Forgery of Letters and Malicious Help in the Case of Buying and Selling Cars with Fake Documents Handled by the Langkat Police

This means that the document is not only carried passively, but is actively used to support transactions (Langkat Police, 2025).

Based on witness statements, after the BPKB and STNK documents were checked through the application, the data that appeared was not the appropriate vehicle data, but other vehicle data. This strengthens the suspicion that the documents brought do not match the vehicle being transacted (Langkat Police, 2025).

In an interview on May 22, 2026, IPTU Dr. Herman F. Sinaga and BRIGPOL Muhammad Ilha Dain explained that checking through the application is used to ensure whether the documents brought are in accordance with vehicle data (Langkat Police, 2025).

The element of using a forged letter as Article 263 paragraph (2) of the Criminal Code becomes relevant if the perpetrator is not proven to be the party who made the false document, but is proven to have used the document (Langkat Police, 2025).

According to the investigator in the interview, the element of malicious help in this case is seen from the role of the perpetrator who helps transfer control of the vehicle through pawn or buying and selling transactions (Langkat Police, 2025).

The results of interviews with investigators show that the Langkat Police not only saw Hamdan as the sole perpetrator, but also traced who gave the order, who provided the documents, and who was the real owner of the vehicle (Langkat Police, 2025).

The application of the element of evil help can also be seen from the purpose of obtaining profits. In criminal law, the motive for profit can be a clue to intentionality or at least awareness to participate in unnatural transactions (Langkat Police, 2025).

The application of criminal elements is also supported by witness statements that match each other. The suitability of the testimony of these witnesses is important because it can strengthen the construction of evidence in criminal cases (Langkat Police, 2025).

4.3. Analysis of Criminal Liability of Parties Involved in Car Buying and Selling Transactions with False Documents in Cases Handled by the Langkat Police

Circumstances such as the price of the car that is far below the market price, an order to claim to be the owner of the car, the use of another identity, and the promise of profits from the pawn, can be an indicator that Hamdan should at least suspect that there is an impropriety in the transaction (Langkat Police, 2025).

The other party mentioned in Hamdan's statement is Ewin. Its role is important because the submission of documents is a direct part of the process of convincing prospective buyers or pawnbrokers (Langkat Police, 2025).

Criminal liability must also pay attention to the element of fault. Therefore, the evidence against Hamdan, Dicky, and Ewin must be directed to the extent to which they knew and wanted the transaction to occur (Hamzah, 2010).

Hamdan's intentionality can be analyzed from his active actions in driving the car, showing documents, claiming to be the owner, and expecting profits. In this case, the use of inappropriate documents and identities can be an indication of awareness of the impropriety of transactions (Moeljatno, 2008).

If Ewin only submitted the document without knowing that the document was fake, then the element of error still needs to be proven further. Therefore, the examination of Ewin is important in uncovering the complete network of acts (Langkat Police, 2025).

In this case, because not all parties who made the document are known, the initial liability can be directed to the party who used the document in the transaction, while still tracing the party who made or provided the false document (Soesilo, 1991).

If Dicky knows that the documents used are fake or deliberately use Hamdan to avoid direct involvement, then his actions can be considered as participation in the crime of forgery of letters or malicious assistance (Langkat Police, 2025).

In criminal cases, assistance provided before or during a criminal act can strengthen the occurrence of a criminal act. Therefore, Ewin's role needs to be proven through follow-up examinations, witness statements, and his communication relationship with Hamdan and Dicky (Langkat Police, 2025).

5. Conclusion

Legal regulations for the crime of forgery of letters and malicious assistance in the transaction of buying and selling cars with false documents have been regulated in Indonesian criminal law, especially Article 263 of the Criminal Code concerning forgery of letters, Article 480 of the Criminal Code concerning malicious assistance or solicitation, and Article 55 of the Criminal Code concerning participation in criminal acts. In car buying and selling transactions, BPKB and STNK have an important position as documents proving the ownership and legality of the vehicle. Therefore, the use of fake BPKB and STNK to sell or pawn a car can be qualified as a criminal offense because it harms other parties, disrupts legal certainty, and damages public trust in official documents of motor vehicles.

The application of elements of the crime of forgery of letters and malicious assistance in the case handled by the Langkat Police can be seen from the act of carrying, showing, and using BPKB and STNK that are suspected of being fake to convince prospective buyers or pawn recipients. The element of letter forgery can be seen from the irregularities in the documents, such as differences in writing, deleted marks, and inconsistencies in vehicle data when checked. Meanwhile, the element of evil help can be seen from the actions of perpetrators who try to

pawn or sell cars that do not belong to them, at prices far below the market price, as well as the promise of profits if the transaction is successful. Based on the results of interviews with investigators, the application of criminal elements was carried out by matching witness statements, evidence, document conditions, vehicle check results, and the role of each party.

The criminal liability of the parties involved in the transaction of buying and selling cars with false documents is determined based on the role and degree of error of each party. Hamdan Afdawi can be held accountable for his role in directly bringing the car, showing documents, and claiming to be the owner of the vehicle in the transaction process. Dicky can be held accountable if it is proven that he told Hamdan to pawn the car and directed him to claim to be the owner. Ewin can also be held accountable if it is proven that he handed over documents and knows that the documents were used for unauthorized transactions. As for Tasman alias Ajo, Muhammad Razali, and Junaidi, it is more appropriate to be placed as witnesses because they play a role in exposing the irregularities of transactions, not as perpetrators of criminal acts.

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References

- (1) Berita Acara Pemeriksaan atas nama Hamdan Afdawi, Polres Langkat, 30 Oktober 2025.
- (2) Berita Acara Pemeriksaan atas nama Junaidi, Polres Langkat, 30 Oktober 2025.
- (3) Berita Acara Pemeriksaan atas nama Muhammad Razali, Polres Langkat, 30 Oktober 2025.
- (4) Berita Acara Pemeriksaan atas nama Tasman alias Ajo, Polres Langkat, 30 Oktober 2025.
- (5) Chazawi, Adami. *Kejahatan terhadap Harta Benda*. Malang: Bayumedia Publishing, 2006.
- (6) _____. *Delik-Delik Khusus: Kejahatan Membahayakan Kepercayaan Umum terhadap Surat, Alat Pembayaran, Alat Bukti, dan Peradilan*. Jakarta: Sinar Grafika, 2013.
- (7) _____. *Delik-Delik Tertentu di dalam KUHP*. Jakarta: Sinar Grafika, 2015.
- (8) Hamzah, Andi. *Asas-Asas Hukum Pidana*. Jakarta: Rineka Cipta, 2010.
- (9) Harahap, M. Yahya. *Hukum Acara Pidana Indonesia*. Jakarta: Sinar Grafika, 2015.
- (10) Huda, Chairul. *Dari Tiada Pidana Tanpa Kesalahan Menuju kepada Tiada Pertanggungjawaban Pidana Tanpa Kesalahan*. Jakarta: Kencana, 2018.
- (11) _____. *Hukum Pidana*. Jakarta: RajaGrafindo Persada, 2017.
- (12) *Kitab Undang-Undang Hukum Pidana*.
- (13) Lamintang, P.A.F., dan Theo Lamintang. *Delik-Delik Khusus: Kejahatan terhadap Harta Kekayaan*. Jakarta: Sinar Grafika, 2009.
- (14) Marzuki, Peter Mahmud. *Penelitian Hukum*. Surabaya: Prenada Media Group, 2005.
- (15) Moeljatno. *Asas-Asas Hukum Pidana*. Jakarta: Rineka Cipta, 2008.
- (16) _____. *Pelajaran Hukum Pidana Bagian I*. Jakarta: RajaGrafindo Persada, 2016.
- (17) *Peraturan Kepolisian Negara Republik Indonesia Nomor 7 Tahun 2021 tentang Registrasi dan Identifikasi Kendaraan Bermotor*.
- (18) Poernomo, Bambang. *Asas-Asas Hukum Pidana*. Yogyakarta: Ghalia Indonesia, 2015.
- (19) Prasetyo, Teguh. *Hukum Pidana*. Jakarta: Rajawali Pers, 2016.
- (20) Purwoleksono, Didik Endro. *Hukum Pidana*. Surabaya: Airlangga University Press, 2016.
- (21) Putra, I.B.M.A. "Pertimbangan Hakim dalam Putusan Perkara Tindak Pidana Penadahan." *Jurnal Interpretasi Hukum* 2, no. 2 (2021): 371.
- (22) Roeslan Saleh. *Perbuatan Pidana dan Pertanggungjawaban Pidana*. Jakarta: Aksara Baru, 2017.
- (23) Rudiyanto. "Tinjauan Yuridis terhadap Tindak Pidana Penadahan." *Jurnal Jendela Hukum* 10, no. 1 (2023): 45.
- (24) Rusianto, Agus. *Tindak Pidana dan Pertanggungjawaban Pidana*. Jakarta: Prenadamedia Group, 2016.

- (25) Saputra, P.F. “Implementasi Sanksi terhadap Pelaku Tindak Pidana Penadahan.” *Res Justitia: Jurnal Ilmu Hukum* 2, no. 1 (2022): 75.
- (26) Sianturi, S.R. *Tindak Pidana di KUHP Berikut Uraianannya*. Jakarta: Alumni AHM-PTM, 1983.
- (27) Soesilo, R. *Kitab Undang-Undang Hukum Pidana (KUHP) serta Komentari-Komentarnya Lengkap Pasal Demi Pasal*. Bogor: Politeia, 1991.
- (28) Sofyan, Andi, dan Nur Azisa. *Hukum Pidana*. Makassar: Pustaka Pena Press, 2016.
- (29) Sudarto. *Hukum Pidana I*. Semarang: Yayasan Sudarto, 1990.
- (30) Sunggono, Bambang. *Metodologi Penelitian Hukum*. Jakarta: RajaGrafindo Persada, 2015.
- (31) Tresna, R. *Asas-Asas Hukum Pidana*. Jakarta: Tiara, 2011.