



# Criminal Responsibility of the Perpetrator of Obstruction of Justice in Corruption Crimes

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DOI:

<https://doi.org/10.47134/ijlj.v2i4.4063>

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Received: 05-04-2025

Accepted: 15-05-2025

Published: 30-06-2025



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**Abstract:** *This research aims to examine the criminal liability of obstruction of justice perpetrators in corruption offenses and analyze the existence of regulations on obstruction of justice in current and future legislation. This research is a normative legal study that uses a case study approach, involving the examination of specific cases from various legal aspects. The case approach is conducted by examining cases related to the issues faced that have become court decisions with permanent legal force. In the case currently under examination, the defendant Friedrich Yunadi, who is a lawyer, was proven legally and convincingly guilty of the crime of "intentionally and jointly obstructing the investigation against the suspect in a corruption case." The sentence imposed by the First Instance Court was 7 (seven) years and a fine of Rp.500,000,000 (five hundred million rupiah), with the provision that if the fine is not paid, it will be replaced with a prison sentence of 5 (five) months. At the appellate level, the High Court upheld the decision of the Central Jakarta District Court No.9/pid.Sus-TPK/2018/PN.Jkt.Pst dated March 5, 2018. Then, the level of the criminal case imposed on the defendant was revised to a prison sentence of 7 years and 6 months and a fine of Rp.500,000,000.00 (five hundred million rupiah). If the fine is not paid, it will be replaced with an 8 (eight) month prison sentence. The change in punishment is due to the defendant's actions as an Advocate that violated the law, which can damage and erode public trust in the law enforcement profession, especially Advocates.*

**Keywords:** Responsibility; Criminal; Obstruction of justice; Corruption

## Introduction

Corruption is an extraordinary crime that requires extraordinary efforts to eradicate. (Khairuddin et al: 2022). The vision of the international community, including Indonesia, has led to an agreement to cooperate in eradicating corrupt practices. This was evidenced by the signing of the anti-corruption declaration in Lima, Peru on September 7-11, 1997, during the Anti-Corruption Conference attended by 93 countries. (Puspitasari, D. R: 2022) The declaration, which later became known as the Declaration of the 8th International Conference Against Corruption, is believed to state that corruption erodes the moral fabric of society, denies the social and economic rights of the underprivileged and the weak. (Sofyanoor, A: 2022) Similarly, corruption is considered to undermine democracy, damage the rule of law which is the foundation of every society, hinder development, and distance

society from the benefits of free and open competition, especially for the less fortunate. (Gusman Arsyad, S. S. T et al: 2024) The conference also believes that fighting corruption is the responsibility of every individual in every society. Fighting corruption also includes upholding and strengthening ethical values in all societies. Therefore, it is very important to foster cooperation between the government, civil society, and the private sector. Faturohman F, et al: 2024). The role of civil society is to eliminate the resistance that arises from those who prefer the status quo and to mobilize the general public to carry out reforms to eradicate corruption. (Wibowo, A: 2013). According to Andi Hamzah, who fully accepts Gunnar Myrdal's opinion as quoted by Arfiani, et al., the way for developing countries to eradicate corruption is by (Waluyo, B: 2022):

1. Raising the salaries of low and middle-level employees;
2. Raising the morale of senior employees;
3. Legalizing illegal levies into official or legal revenue.

The eradication of corruption cannot be said to be optimal if there are still individuals who tarnish the law enforcement process. (Sinaga, R. R. P., & Gulo, A: 2023) Lawrence M Friedman, as quoted by Dary Iqbal Putra Perdana and Wahyu Prawesthi, states that the success of law enforcement is when all components of the legal system work together to reinforce the elements of the legal system. (Masyhudi, M: 2019). The elements of the legal system include legal structure, legal substance, and legal culture. (Said, H., & Dinata, M. R. K: 2025). However, these elements of law enforcement have not yet fully synergized to eradicate corruption; there are still obstacles in their law enforcement efforts. In practice, it is still hindered by obstruction of justice. In corruption crimes, obstruction of justice is regulated in Articles 21 to 24 of Law No. 31 of 1999 on the Eradication of Corruption Crimes as amended by Law No. 20 of 2001. Article 21 explicitly explains the act of intentionally preventing, obstructing, or thwarting directly or indirectly the investigation, prosecution, and examination in court against suspects or defendants or witnesses in corruption cases, punishable by imprisonment for a minimum of 3 (three) years and a maximum of 12 (twelve) years and/or a fine of at least Rp. 150,000,000 (one hundred fifty million Rupiah) and a maximum of Rp. 6,000,000 (six hundred million Rupiah). (Perdana, D. I. P., & Prawesthi, W: 2023) There are several examples of obstruction of justice cases, including the case involving lawyer Friedrich Yunadi and doctor Bimanesh Sutarjo, who obstructed the investigation of the corruption case by Setya Novanto, the suspect in the E-KTP corruption case. Although obstruction of justice has the potential to hinder the eradication of corruption, in practice, there are still differing perceptions among law enforcement regarding the elements of the act of obstruction of justice. (Arfiani, et al: 2023)

## Research Methodology

This research is a normative legal study using a case study approach, specifically a case study of a particular case from various legal aspects. The case approach is conducted by reviewing cases related to the issues faced that have become court decisions with permanent legal force. (Achjar, K. A. H. et al: 2023) This research is a normative legal study that prioritizes library research with data collection from libraries and other places. The legal materials analyzed are the corruption court decision at the Central Jakarta District Court Number 9/Pid.Sus-TPK/2017/PN Jkt.Pst dated June 28, 2018, along with the decisions

at the appellate and cassation levels. Then there are regulations such as Law No. 20 of 2001 on Amendments to Law No. 31 of 1999 on the Eradication of Corruption, Law No. 1 of 2023 on the Criminal Code.

## Result and Discussion

### A. Obstruction of justice in Corruption Crimes

The term Obstruction of justice is one of the acts of criminal contempt of court. Another definition of obstruction of justice is perverting the course of justice, which means a punishment generally based on common law rather than statutory law. (GIFARI, H. A : 2024). The term obstruction of justice is a common law legal terminology, which is often translated in Indonesian criminal law doctrine as the crime of obstructing legal proceedings. (Tangko, L. A. A., Agung, D., & Pratiwi, A. D: 2023) Furthermore, Charles Boys states that obstruction of justice is an effort aimed at hindering the administration of justice, the judicial system, and law enforcement officers by threatening witnesses, covering up evidence, and obstructing the arrest of perpetrators. (Supardjo, F : 2024) In Indonesia, the act of obstructing the judicial process has been normatively regulated in several laws, both in the Criminal Code (KUHP) and in specific laws outside the KUHP, such as those regulated in the Anti-Corruption Law. Obstruction of justice as a criminal offense is regulated in Book Two, Chapter VIII, Article 221, Paragraph (1) (Moeljatno, S. H: 2021): Punished with imprisonment for a maximum of nine months or a fine of up to four thousand five hundred rupiah:

1. Anyone who intentionally conceals a person who has committed a crime or who is being prosecuted for a crime, or anyone who assists them in evading investigation or detention by judicial or police officials, or by others who, according to legal provisions, are continuously or temporarily entrusted with police duties.
2. Anyone who, after a crime has been committed and with the intent to cover it up, or to obstruct or complicate the investigation or prosecution, destroys, removes, conceals objects against which or with which the crime was committed or other traces of the crime, or withdraws them from examination by judicial or police officials or by others who, according to the provisions of the law, are continuously or temporarily entrusted with police duties.
3. Actions obstructing legal proceedings in Law No. 31 of 1999 on the Eradication of Corruption Crimes as amended by Law No. 20 of 2001 are regulated in several articles as follows (Fiter, D. J et al : 2024):

#### a. Article 21

"Anyone who intentionally prevents, obstructs, or frustrates directly or indirectly the investigation, prosecution, and examination in court against suspects and defendants or witnesses in corruption cases shall be punished with imprisonment for a minimum of 3 (three) years and a maximum of 12 (twelve) years."

) years and/or a fine of at least IDR 150,000,000 (one hundred fifty million rupiah) and at most IDR 600,000,000 (six hundred million rupiah)

#### b. Article 22

"Any person as referred to in Article 28, Article 29, Article 35, or Article 36 who intentionally does not provide information or provides false information shall be punished with imprisonment for a minimum of 3 (three) years and a maximum of 12 (twelve) years and/or a fine of at least Rp. 150,000,000 (one hundred fifty million rupiah)." and a maximum of Rp. 600,000,000 (six hundred million rupiah)

c. Article 23

"In corruption cases, violations of the provisions as referred to in Article 220, Article 231, Article 421, Article 422, Article 429, or Article 430 of the Criminal Code are punishable by imprisonment for a minimum of 1 (one) year and a maximum of 6 (six) years and/or a fine of at least Rp. 50,000,000 (fifty million rupiah) and at most Rp. 300,000,000 (three hundred million rupiah)."

d. Article 24

"Witnesses who do not comply with the provisions as referred to in Article 31 shall be punished with imprisonment for a maximum of 3 (three) years and/or a fine of up to Rp.150,000,000 (one hundred fifty million rupiah)."

Witnesses who do not meet the provisions as referred to in Article 31 shall be punished with imprisonment for a maximum of 3 (three) years and/or a fine of up to Rp.150,000,000 (one hundred fifty million rupiah).

B. Criminal Responsibility Obstruction of Justice in Corruption Crimes Corruption Court Decision at the Central Jakarta District Court Number 9/Pid.Sus-TPK/2017/PN Jkt.Pst dated June 28, 2018 states:

1. The defendant Dr. Friedrich Yunadi, SH, LLM, MBA, has been proven legally and convincingly guilty of the crime of "intentionally and jointly obstructing the investigation against the suspect in the corruption case."
2. Sentencing the defendant to 7 (seven) years in prison and a fine of Rp.500,000,000 (five hundred million rupiah) with the provision that if the fine is not paid, it will be replaced with an imprisonment of 5 (five) months.
3. Determining that the period of arrest and detention already served by the defendant is fully deducted from the imposed sentence.
4. Determining that the defendant remains in custody.
5. There are several pieces of evidence presented in the trial, including documents, letters, photographs, and minutes of the proceedings. Here is a summary of the evidence:
  - a. The documents submitted by the defendant consist of T-1 to T-36, including the Corruption Crime Incident Report (TPK) No.LKTPK-03/KPK-01/2018 dated 5/01/2018, which accuses the defendant of lying about his status as Setya Novanto's legal counsel when submitting a request for a postponement of Setya Novanto's examination.
  - b. Special Power of Attorney from Setya Novanto to Friedrich Yunadi and associates showing the defendant's role as Setya Novanto's legal counsel on various dates and letter numbers.

- c. Police report about the accident involving Setya Novanto on November 16, 2017.
- d. Invitation from Polda Metro Jaya dated November 1, 2017 (LP/1048) and the arrest and detention order (SP2HP LP/1192) dated December 8, 2017.
- e. Summons for the Constitutional Court hearing case Number: 95 / PUU-XV/2017 and 96/ PUU-XV/2017 which show the defendant's role as Setya Novanto's legal counsel in the Constitutional Court hearing.
- f. Notification letter that the defendant cannot attend the summons, such as summons letter No. Spgl 16011/23/11/2017 and Spgl/6064/23/11/2017, as well as the resignation letter of the defendant and Otto H regarding the E-KTP case.
- g. Photos related to the incident at RS Meidika Permata Hijau (RSM PH) and RSCM, including photos of Setya Novanto's condition in the hospital and during his transport from RSCM to the KPK.
- h. Recordings of conversations and interviews with related parties, such as Reixa Pahlevi, Sik, and Aziiz Samuel, as well as photos of the search at the Yunadi & Associates office.
- i. Other photos showing the condition of the incident, as well as photos of Setya Novanto's injuries when he was transported from RSCM to KPK.
- j. Jurisprudence MA RI 1531 K/Pid.Sus/2010 which shows that investigators should not present fact witnesses, but only as verification witnesses.
- k. Decision of the Constitutional Court Number 15 of 1983 Regarding the Pretrial Examination of the Military.
- l. Evidence that the defendant is a member of the Bar Association (IBA) with membership number 1378199.
- m. Evidence of a complaint to the High Human Rights Council, United Nations High Commissioner for Human Rights, and IBAHRI (IBA Human Rights Institute) along with the response from the IBA.
- n. Official case recordings in the case file pages 225&226 showing the PLAN for an accident fabrication carried out by Kompol (P) Riizka Anungnata.
- o. Imposing on the defendant to pay court fees amounting to Rp.7,500.00 (seven thousand five hundred rupiah).

In the trial, it was revealed that the defendant, as Setya Novanto's legal counsel, had orchestrated a scheme for his client to be hospitalized at RS Medika Permata Hijau Jakarta to avoid questioning by KPK investigators. It was also revealed that there was a request to manipulate the accident diagnosis even though the accident never occurred. At the appellate level, the High Court upheld the decision of the Central Jakarta District Court No.9/pid.Sus-TPK/2018/PN.Jkt.Pst dated March 5, 2018. Against the appellate decision, both the defendant and the prosecutor at the KPK filed a cassation petition. In its considerations, the Supreme Court opined that the defendant's cassation reasons could not be justified because the Judge did not factually misapply the law in examining the defendant's case and did not exceed his authority. (Arifin, Z., & Iqbal, M : 2020)

Moreover, the defendant's objection cannot be justified because the objection relates to the assessment of the evidence, which is an evaluation of an event that cannot be considered. (Pratama, Y. Y., & Ruslie, A. S : 2024) In the examination at the cassation level, because the examination at the cassation level only relates to whether a legal regulation has not been enforced or whether the legal regulation has been enforced improperly, or whether the Court has exceeded its authority as regulated in Article 253 of the Criminal Procedure Code. (Basri, H : 2021) As for the reasons for the cassation by the public prosecutor, the Supreme Court opines that the public prosecutor's cassation reasons cannot be justified because the factual judge did not misapply the law in examining the defendant's case (a quo) and did not exceed his authority. The Public Prosecutor argues that the decision of the Corruption Court at the DKI Jakarta High Court Number 23/Pid.Sus-TPK/2018/PT DKI dated October 5, 2018, which upheld the decision of the Corruption Court at the Central Jakarta District Court Number 9/Pid.Sus TPK/2018/PN.JKT.PST dated June 28, 2018, has legally and convincingly proven that the defendant intentionally and jointly obstructed the investigation against the suspect in the corruption case.

The defendant was sentenced to 7 years in prison and a fine of Rp.500,000,000.00 (five hundred million rupiah), and if the fine is not paid, it will be replaced with an imprisonment of 5 months. The decision rendered by the Supreme Court is to reject the cassation requests from both the defendant and the Public Prosecutor, but the Supreme Court considers that the ruling made by the Judge in this case is in accordance with the applicable laws and regulations. However, improvements need to be made regarding the imposition of the sentence on the defendant as stated in the verdict. The Supreme Judge considers that the actions of the defendant as an Advocate who violated the law can damage and undermine public trust in the legal profession, especially Advocates. Therefore, the sentence imposed on the defendant needs to be revised. The revision is regarding the sentence imposed on the defendant, which is changed to a prison term of 7 years and 6 months and a fine of Rp.500,000,000.00 (five hundred million rupiah). If the fine is not paid, it will be replaced with an imprisonment sentence of 8 (eight) months. The defendant is also required to pay court costs amounting to Rp. 2,500.00 (Two thousand five hundred rupiah).

#### C. Regulation of Obstruction of Justice In existing and future legislation In the Criminal Code.

Obstruction of Justice is regulated in Articles 216 to 222. Article 221 of the Criminal Code regulates that "any person who obstructs the legal process shall be punished and threatened with imprisonment for a maximum of nine months, or a fine of up to Rp.4500.00 (four thousand five hundred rupiah)." Obstruction of Justice is also regulated in Law No. 31 of 1999 Jo Law No. 20 of 2001 concerning Amendments to Law No. 31 of 1999 concerning the Eradication of Corruption Crimes. Article 21 regulates that any person who intentionally prevents, obstructs, or hampers directly or indirectly the investigation, prosecution, and examination in court against suspects and defendants or witnesses in corruption cases, shall be punished with imprisonment for a

minimum of 3 years and a maximum of 12 years and/or a fine of at least Rp.150,000,000.00 and a maximum of Rp.600,000,000.00.

The elements in Article 21 are:

Every person, including individuals and/or Corporations.

1. Intentionally preventing, obstructing, or thwarting directly or indirectly the investigation, prosecution, and examination in court of suspects, defendants, or witnesses in corruption cases, with the aim of ensuring that the legal process cannot be carried out in accordance with the provisions set forth in the Anti-Corruption Law.
2. The act of obstruction of justice can be carried out either directly or indirectly. Directly means the perpetrator commits the act themselves or together with other perpetrators. Whereas indirectly means that the action is carried out through another person who has influence, such as influencing the authorized officials in the corruption case.
3. The process of investigation, prosecution, and examination in court of the defendant and witnesses in corruption cases. The perpetrator carried out a series of actions with the aim of obstructing the ongoing legal process. And whether that goal is achieved or not is not a requirement for being punished.

In Law No. 1 of 2023 on the Criminal Code, the regulation regarding obstructing the examination of criminal cases is stipulated in CHAPTER VI on Criminal Offenses against the Judicial Process. Article 278 regulates (1) sentenced for obstructing the judicial process with a prison term of up to 6 (six) years or a fine of up to category V, anyone who:

- a. Forging, creating, or submitting false evidence to be used in the judicial process,
- b. Directing a witness to give false testimony in court.
- c. Altering, damaging, concealing, removing, or destroying evidence
- d. Altering, damaging, hiding, removing, or destroying evidence, tools or means used to commit a crime or that are the object of a crime, or results that can serve as physical evidence of the commission of a crime or removing them from the examination conducted by the authorized official after the crime has occurred, or
- e. Presenting oneself as if being the perpetrator of a crime, so that the individual undergoes the Criminal Justice process.

In the case of the crime as referred to in Paragraph (1) being committed:

- a. In the judicial process, sentenced to imprisonment for a maximum of 7 (seven) years and 6 (six) months or a fine of up to category VI And
- b. By law enforcement officers or court officials, punished with imprisonment imprisonment for a maximum of 9 (nine) years or a fine of up to category VI.

If the act as referred to in Paragraph (2) results in someone:

- a. Those who should be guilty are declared not guilty,
- b. Those who should be innocent are declared guilty, or
- c. Charged with a lighter or heavier article than it should be, the sentence can be increased by 1/3 (one-third) of the sentence as referred to in Paragraph 2.

Article 281 regulates "any person who obstructs, intimidates, or influences an official carrying out the duties of investigation, prosecution, examination in court, or court

decisions with the intent to force or persuade them to perform or not perform their duties shall be punished with imprisonment for a maximum of 7 (seven) years and 6 (six) months or a fine of up to category VI."

## Conclusion

In the case under investigation, the defendant Dr. Friedrich Yunadi, SH, LLM, MBA, was proven in a lawful and convincing manner according to the law to be guilty of the crime of "deliberately and jointly obstructing the investigation against the suspect in a corruption case." The judge sentenced the defendant to 7 (seven) years in prison and a fine of Rp.500,000,000 (five hundred million rupiah), with the provision that if the fine is not paid, it will be replaced with an imprisonment of 5 (five) months. At the appellate level, the High Court upheld the decision of the Central Jakarta District Court No.9/pid.Sus-TPK/2018/PN.Jkt.Pst dated March 5, 2018. At the cassation level, the decision rendered by the Supreme Court was to reject the cassation petitions from both the defendant and the Public Prosecutor, but the Supreme Court deemed that the decision made by the Judge in this case was in accordance with the applicable laws and regulations. However, improvements need to be made regarding the sentencing.

Punishment to the defendant as referred to in the verdict. The Supreme Judge considered that the actions of the defendant as a lawyer who violated the law could damage and undermine public trust in the law enforcement profession, especially lawyers. Therefore, the sentence imposed on the defendant needs to be revised. The revision is regarding the sentence imposed on the defendant, changing it to imprisonment for 7 years and 6 months and a fine of Rp.500,000,000.00 (five hundred million rupiah). If the fine is not paid, it will be replaced with an imprisonment sentence of 8 (eight) months. The defendant is also required to pay court costs amounting to Rp. 2,500.00 (Two thousand five hundred rupiah). In the Criminal Code, Obstruction of Justice is regulated in Articles 216 to 222. Article 221 of the Criminal Code regulates that "any person who obstructs the legal process shall be punished and threatened with imprisonment for a maximum of nine months, or a fine of up to Rp.4500.00 (four thousand five hundred rupiah)." Obstruction of Justice is also regulated in Law No. 31 of 1999 Jo Law No. 20 of 2001 concerning Amendments to Law No. 31 of 1999 concerning the Eradication of Corruption Crimes. Article 21 regulates that anyone who intentionally prevents, obstructs, or hinders directly or indirectly the investigation, prosecution, and examination in court against suspects and defendants or witnesses in corruption cases, shall be punished with imprisonment for a minimum of 3 years and a maximum of 12 years and/or a fine of at least Rp.150,000,000.00 and a maximum of Rp.600,000,000.00.

In Law No. 1 of 2023 on the Criminal Code, the rules regarding obstructing the examination of criminal cases are regulated in Chapter VI on Crimes against the Judicial Process. In Articles 278 and 281. The regulations regarding criminal acts that obstruct the investigation of criminal cases, as applied in that case, are expected to be strictly enforced, especially against law enforcers who commit them, to prevent the emergence of other perpetrators from the ranks of law enforcers. Then, it is also hoped that there will be clear and firm regulations regarding what actions fall under the definition of obstructing the criminal investigation process.

## References

- Achjar, K. A. H., Rusliyadi, M., Zaenurrosyid, A., Rumata, N. A., Nirwana, I., & Abadi, A. (2023). *Qualitative research methods: A practical guide for qualitative data analysis and case studies*. PT. Sonpedia Publishing Indonesia
- Ajzen, I. (2020). The theory of planned behavior: Frequently asked questions. *Human Behavior and Emerging Technologies*, 2(4), 314–324. <https://doi.org/10.1002/hbe2.195>
- Arfiani, A., Syofyan, S., & Delyarahmi, S. (2023). The Problem of Law Enforcement in Obstruction of Justice Offenses Obstruction of Justice in the Law on the Eradication of Corruption Crimes. *Unes Journal of Swara Justisia*, 6(4), 516-540.
- Arifin, Z., & Iqbal, M. (2020). Legal protection for registered trademarks. *Ius Constituendum Journal*, 5(1), 47-65.
- Basri, H. (2021). Legal Protection for Criminal Offenders Based on the Indonesian Criminal Justice System. *SIGn Journal of Law*, 2(2), 104-121.
- Chong, A. Y. L., Liu, M. J., Luo, J., & Keng-Boon, O. (2021). Predicting consumer product demands via Big Data: The roles of online promotional marketing and online reviews. *International Journal of Production Economics*, 231, 107862. <https://doi.org/10.1016/j.ijpe.2020.107862>
- Dwivedi, Y. K., Ismagilova, E., Hughes, D. L., Carlson, J., Filieri, R., Jacobson, J., ... & Wang, Y. (2021). Setting the future of digital and social media marketing research: Perspectives and research propositions. *International Journal of Information Management*, 59, 102168. <https://doi.org/10.1016/j.ijinfomgt.2020.102168>
- Faturohman, F., Anggreini, A., & Deasti, R. T. (2024). Building a Pancasila Legal System Free from Corruption and Upholding Human Rights. *ALADALAH: Journal of Politics, Social Sciences, Law, and Humanities*, 2(3), 144-153.
- Fiter, D. J., Sahari, A., & Mansar, A. (2024). Implementation of Law Number 20 of 2001 on Amendments to Law Number 31 of 1999 on the Eradication of Corruption (Study of the Deli Serdang District Attorney's Office). *Iuris Studia: Journal of Legal Studies*, 5(2), 198-208.
- GIFARI, H. A. (2024). *LEGAL PROTECTION FOR JUSTICE COLLABORATORS IN REVEALING CORRUPTION CRIMES* (Doctoral dissertation, Universitas Islam Sultan Agung Semarang).
- Gusman Arsyad, S. S. T., Parwito, M. P., Mohamad Ikbil Kadir, S. H., ST, L., Jana Milia, S., Elfitri Yuza, S. H., ... & Yudi Fahrian, S. H. (2024). *Anti-Corruption Education (Fighting Corruption for the Nation)*. Mega Press Nusantara.
- Hsu, C. L., & Lin, J. C. C. (2020). What drives purchase intention for paid mobile apps? – An expectation confirmation model with perceived value. *Electronic Commerce Research and Applications*, 39, 100904. <https://doi.org/10.1016/j.eierap.2019.100904>
- Khairuddin, A., Yudhayani, A. S., Harahap, A., & Wulandari, V. (2022). Corruption Affects the Economy in Indonesia. *IJTIMAIYAH Journal of Social and Cultural Sciences*, 6(2), 21-26.

- Kim, H., & Park, J. (2023). Digital consumer behavior in the era of e-commerce: Influence of personalized advertisements. *Journal of Retailing and Consumer Services*, 71, 103200. <https://doi.org/10.1016/j.jretconser.2022.103200>
- Masyhudi, M. (2019). Building an Integrity System for Combating Corruption in the Indonesian Criminal Justice System. *Journal of Law Ius Quia Iustum*, 26(1), 44-66.
- Moeljatno, S. H. (2021). KUHP (Criminal Code). Bumi Aksara.
- Nugroho, A., & Haryanto, B. (2022). The effect of e-commerce and trust on impulsive buying behavior among millennials. *Jurnal Manajemen dan Kewirausahaan*, 24(1), 10–19. <https://doi.org/10.9744/jmk.24.1.10-19>
- Perdana, D. I. P., & Prawesthi, W. (2023). Legal Sanctions Against Perpetrators of Obstruction of Justice in Corruption Cases. *Wahana Pendidikan Scientific Journal*, 9(24), 246-256.
- Pratama, Y. Y., & Ruslie, A. S. (2024). Second-Level Review in Corruption Criminal Cases. *SEIKAT: Journal of Social, Political, and Legal Sciences*, 3(1), 20-25.
- Puspitasari, D. R. (2022, August). Extradition of Corruption Offenders in the Perspective of International Criminal Law. In the Proceedings of the National Seminar on Research Results (SNHR).
- Rahman, M., & Ahamad, M. (2023). Online shopping and consumer behavior: An empirical study in a developing economy. *International Journal of E-Business Research*, 19(1), 1–19. <https://doi.org/10.4018/IJEER.321659>
- Said, H., & Dinata, M. R. K. (2025). THE ROLE OF LAW IN COMBATING CORRUPTION IN THE HEALTH SECTOR: A REVIEW OF PRACTICE AND POLICY. *Journal of Innovation Research and Knowledge*, 4(9), 6269-6276.
- Setiawan, D., & Maulani, H. (2021). Online shopping behavior during the COVID-19 pandemic: The role of product review and purchase decision. *Jurnal Ilmu Ekonomi dan Bisnis*, 8(2), 233–243. <https://doi.org/10.35829/idebis.v8i2.268>
- Sinaga, R. R. P., & Gulo, A. (2023). Corruption and the Culture of Shame: The Contribution of the Culture of Shame to the Development of the Theology of Shame in the Efforts to Combat Corruption in Indonesia. *GEMA TEOLOGIKA: Journal of Contextual Theology and Divine Philosophy*, 8(2), 151-166.
- Sofyanoor, A. (2022). The Role of State Administrative Law in Combating Corruption in Indonesia. *Sibatik Journal: Scientific Journal in the Fields of Social, Economic, Cultural, Technology, and Education*, 1(2), 21-30.
- Supardjo, F. (2024). ENFORCEMENT OF THE LAW ON OBSTRUCTION OF JUSTICE IN POLICE INVESTIGATION PROCESSES (Doctoral dissertation, Universitas Islam Sultan Agung Semarang).
- Tangko, L. A. A., Agung, D., & Pratiwi, A. D. (2023). The Application of Law to Perpetrators and Victims of the Crime of Obstruction of Justice. *Alauddin Law Development Journal*, 5(2), 274-282.
- Waluyo, B. (2022). Eradication of corruption crimes: Strategies and optimization. Sinar Grafika.
- Wibowo, A. (2013). Anti-Corruption Education. Yogyakarta: Pustaka Pelajar.

- 
- Wijaya, T., & Amelia, D. (2020). The influence of social media marketing and e-WOM on purchase decision in e-commerce Shopee. *Jurnal Manajemen*, 24(2), 202–216. <https://doi.org/10.24912/jm.v24i2.720>
- Zhang, Y., Zhao, K., & Xu, X. (2022). Customer satisfaction and repurchase intention in e-commerce: A study of a reputable Chinese platform. *Journal of Retailing and Consumer Services*, 66, 102888. <https://doi.org/10.1016/j.jretconser.2021.102888>