



|                 |                      |                     |                      |                       |
|-----------------|----------------------|---------------------|----------------------|-----------------------|
| Article History | Received: 17-05-2025 | Reviewed:24-05-2025 | Accepted: 30-05-2025 | Published: 01-06-2025 |
|-----------------|----------------------|---------------------|----------------------|-----------------------|

## REGENT'S LIABILITY FOR RECEIVING BRIBERY OF PROCUREMENT OF GOODS/SERVICES

Ahmad Feri Tanjung<sup>1</sup>, Ronald Hasudungan Sianturi<sup>2</sup>, Rony Andre Christian<sup>3</sup>

<sup>1,2,3</sup> Fakultas Hukum, Universitas Prima Indonesia

ahmadferitanjung@unprimdn.ac.id

### ABSTRACT

*This article aims to examine the application of criminal liability to the Regent because he received bribes related to the procurement of goods/services. The act of receiving bribery is an action that is contrary to the law, especially the provisions of Article 12 B of Law Number 20 of 2001 Concerning Eradication of Corruption Crimes. The problem is focused on the application of the criminal liability of the Labuhan Batu Regent because he received bribes related to the procurement of goods/services. The theory used in analyzing the problem approach is the Theory of Criminal Liability put forward by Dwidja Priyatno. According to Dwidja Priyatno, criminal liability was born with an objective reproach against actions stated as criminal acts based on applicable criminal law, and subjectively to perpetrators who meet the requirements to be criminalized because of their actions. Data are collected through primary legal materials, secondary legal materials, as well as tertiary legal materials, and are analyzed qualitatively. This study concluded that the criminal liability applied to the Labuhan Batu Regent because receiving bribes related to the procurement of goods and services is in the form of imprisonment, criminal fines, additional crimes paying replacement money, and additional crimes in the form of revocation of the right to be elected.*

**Keywords:** Liability, Regent, Bribery.

### ABSTRAK

Artikel ini bertujuan untuk mengkaji penerapan pertanggungjawaban pidana terhadap Bupati sebab menerima suap terkait pengadaan barang/jasa. Tindakan menerima suap tersebut merupakan tindakan yang bertentangan dengan hukum, khususnya ketentuan Pasal 12 B Undang-Undang Nomor 20 Tahun 2001 Tentang Pemberantasan Tindak Pidana Korupsi. Masalah difokuskan pada penerapan pertanggungjawaban pidana Bupati Labuhan Batu sebab menerima suap terkait pengadaan barang/jasa. Teori yang digunakan dalam menganalisis pendekatan masalah adalah Teori Pertanggungjawaban Pidana yang dikemukakan oleh Dwidja Priyatno. Menurut Dwidja Priyatno, pertanggungjawaban pidana lahir dengan diteruskannya celaan yang objektif terhadap tindakan yang dinyatakan sebagai tindak pidana berdasarkan Hukum Pidana yang berlaku, dan secara subjektif kepada pelaku yang memenuhi persyaratan untuk dapat dikenai pidana karena tindakannya. Data-data dikumpulkan melalui bahan hukum primer, bahan hukum sekunder, maupun bahan hukum tertier, dan dianalisis secara kualitatif. Kajian ini menyimpulkan bahwa pertanggungjawaban pidana yang diterapkan terhadap Bupati Labuhan Batu sebab menerima suap terkait

pengadaan barang dan jasa adalah berupa pidana penjara, pidana denda, pidana tambahan membayar uang pengganti, dan pidana tambahan berupa pencabutan hak untuk dipilih.

**Kata Kunci:** Pertanggungjawaban, Bupati, Suap.

---

## INTRODUCTION

Law cannot be separated from human life.<sup>1</sup> According to J.C.T. Simorangkir: "Law is all regulations that are mandatory and determine all people's behavior in society, and are made by an authorized institution".<sup>2</sup>

Indonesia is a state of law. In accordance with the Preamble to the 1945 Constitution of the Republic of Indonesia (UUD 1945) Paragraph IV, the state of law in question is a modern state of law/welfare state/material state of law.<sup>3</sup>

R. Kranenburg has put forward the Theory of the Welfare State. According to R. Kranenburg: "The state must play an active role in trying to realize welfare, and must act fairly so that the people can feel it evenly and in balance".<sup>4</sup>

The country in question is a country in the narrow sense, namely the Government. In order to accelerate the implementation of equitable development for the welfare of all Indonesian people, regional autonomy has been implemented. This is confirmed by the existence of Law Number 9 of 2015 concerning Regional Government (Law Number 9 of 2015) and other related laws and regulations.

Regional autonomy is implemented throughout Indonesia. This is also the case in Labuhan Batu Regency, which is administratively part of the North Sumatra Province. Fulfillment of the need for goods/services is an important part that cannot be separated from the implementation of regional government in Labuhan Batu Regency. The availability of goods/services, in addition to being part of the duties and responsibilities in an effort to fulfill

---

<sup>1</sup> Panjaitan, W.M. & Naldo, R.A.C. (2025). *Pertanggungjawaban Anak yang Berkonflik Dengan Hukum Sebab Persetubuhan*. Malang: Literasi Nusantara, hlm. 1

<sup>2</sup> Syahrin, A., et.al. (2019). *Ilmu Hukum Indonesia (Suatu Pengantar)*. Depok: Rajawali Pers, hlm.4

<sup>3</sup> Naldo, R.A.C. & Purba, M. (2019). *Pertanggungjawaban Mutlak Korporasi Sebab Kebakaran Lahan Mengakibatkan Pencemaran/Kerusakan Lingkungan Hidup*. *Jurnal Ilmiah Penegakan Hukum*.

<sup>4</sup> Ibid.

the needs of the community, is also a fulfillment of the needs of the Labuhan Batu Regency Government in organizing regional government.

Fulfillment of the needs of the Labuhan Batu Regency Government for goods/services needed as an effort to meet the needs of the community and meet the needs in organizing regional government, can be done through procurement of goods/services activities. Article 1 number (1) of Presidential Regulation Number 12 of 2021 concerning Government Procurement of Goods/Services (Presidential Regulation Number 12 of 2021), stipulates that: "Government procurement of goods/services, hereinafter referred to as 'procurement of goods/services', is the procurement of goods/services by ministries/institutions/regional apparatuses funded by the APBN/APBD, the process of which starts from identifying needs, to the handover of work results."

Procurement of goods/services as an effort to meet the needs of the community and meet the needs of the Regional Government (Pemda) in organizing regional government must be carried out in accordance with the provisions of laws and regulations. Regarding laws and regulations, according to Bagir Manan: "Legislation is a written decision issued by an authorized institution or official containing rules of conduct that are generally binding".<sup>5</sup>

Regarding the implementation of procurement of goods/services that must be carried out in accordance with the provisions of laws and regulations (laws), it is hoped that in the implementation there will be no violations of the law. Legal facts in Labuhan Batu Regency, there were violations of the law. This was emphasized because the Regent of Labuhan Batu received bribes related to the procurement of goods/services (project fees) that had been prepared from contractors in the amount of Rp. 4,985,000,000.00- (Four Billion Nine Hundred Eighty Five Million Rupiah) through an individual with the initials R.S. who is a trusted person.<sup>6</sup>

The legal fact of accepting bribes related to the procurement of goods/services certainly violates the provisions of Article 12 B of Law Number 20 of 2001 concerning the Eradication of Criminal Acts of Corruption

---

<sup>5</sup> *Ibid*, hlm. 11

<sup>6</sup> Nasution. M.S. (2024). PN Medan Mulai Adili Mantan Bupati Labuhan Batu Terkait Korupsi. <https://www.antaraneews.com/berita/4129350/pn-medan-mulai-adili-mantan-bupati-labuhanbatu-terkait-korupsi>. Bahan Diakses di Medan, Kamis, 20 Februari 2025, Jam 01.29 WIB.

(Law Number 20 of 2001). Thus, because of his actions/deeds, the Regent of Labuhan Batu (non-active) must be subject to criminal liability.

## RESEARCH METHODOLOGY

This research is a normative legal research.<sup>7</sup> The method used is the normative legal method.<sup>8</sup> This research is analytical prescriptive. The data of this research is like normative legal research, namely using secondary data, either in the form of primary legal materials, secondary legal materials, or tertiary legal materials as the main data in the research.<sup>9</sup>

Data collection is carried out through library research studies, namely collecting document data, literature and studying the provisions of laws and regulations related to the problems to be answered in the study.<sup>10</sup>

All data that has been obtained and collected will then be reviewed and analyzed qualitatively. Further described again to be presented systematically, so as to produce a discussion that can be used to answer the problems in this study.<sup>11</sup>

## RESULT AND DISCUSSION

### Procedure for Determining Justice Collaborator

According to the provisions of Article 1 number (3) of the 1945 Constitution, Indonesia is a country of law. The country of law in question is a welfare state of law. According to Aristotle: "A state of law as a state that stands above the law that guarantees justice for its citizens".<sup>12</sup>

---

<sup>7</sup> Soemitro, R.S. (1988). *Metodologi Penelitian Hukum dan Jurimetri*. Jakarta: Ghalia Indonesia, hlm.10

<sup>8</sup> Soekanto, S. & Mamuji, S. (2004). *Penelitian Hukum Normatif*. Jakarta: Raja Grafindo Persada, hlm.10

<sup>9</sup> Sunggono, B. (2002). *Penelitian Hukum (Suatu Pengantar)*. Jakarta: Raja Grafindo Persada, hlm 194-195.

<sup>10</sup> Naldo, R.A.C. & Purba, M. (2019). *Pertanggungjawaban Mutlak Korporasi Sebab Kebakaran Lahan Mengakibatkan Pencemaran/Kerusakan Lingkungan Hidup*. *Jurnal Ilmiah Penegakan Hukum*. 5(1): 43.

<sup>11</sup> Saragih, R. & Naldo, R.A.C. (2023). *Pertanggungjawaban Hukum Direksi Sebab Tidak Menerapkan Asas Kehati-hatian Dalam Menyalurkan Mudharabah*. *Jurnal Ilmiah Advokasi*. 11(2): 295.

<sup>12</sup> Palguna, I.D.G. (2013). *Pengaduan Konstitusional (Constitutional Complaint) Upaya Hukum Terhadap Pelanggaran Hak-hak Konstitusional Warga Negara*. Jakarta: Sinar Grafika, hlm.43.

As a state of law, the Government's task is to advance the welfare of all people. In order to accelerate the implementation of equitable development for the welfare of all people, regional autonomy is implemented throughout Indonesia. Likewise in Labuhan Batu Regency.

Fulfillment of the need for goods/services is an important part that cannot be separated from the implementation of regional government in Labuhan Batu Regency. The availability of goods/services, in addition to being part of the duties and responsibilities in an effort to fulfill the needs of the community, is also the fulfillment of the needs of the Labuhan Batu Regency Government in organizing regional government, which of course is carried out through procurement of goods/services.

Procurement of goods/services includes goods, construction work, consulting services, and other services. Procurement of goods/services by the local government can be carried out in an integrated manner. Procurement of goods/services by the local government can be carried out in 2 (two) ways, namely self-management and providers. All procurement whose funding sources come from the local government, either through the Regional Revenue and Expenditure Budget (APBD), or the acquisition of community funds managed by local government institutions are categorized as public procurement.<sup>13</sup>

Regarding the implementation of procurement activities for local government goods/services which in fact use state finances, ideally the principles of orderliness, compliance with laws and regulations, efficiency, economy, effectiveness, transparency, responsibility, fairness, and appropriateness must be applied (Naldo, et.al., 2021: 50). In accordance with the provisions of Article 6 of Presidential Regulation Number 12 of 2021, procurement of local government goods/services is carried out based on the principles of efficiency, effectiveness, transparency, openness, competition, fairness, and accountability.

Procurement activities for goods/services as an effort to meet the needs of the community and meet the needs of the Labuhan Batu Regency Government in order to organize regional government must be carried out in accordance with legal provisions. Regarding this, it is hoped that in the implementation there will be no violations of the law.

---

<sup>13</sup> Naldo, R.A.C. & Purba, M, *Kepastian Hukum Prioritas Pemberdayaan Usaha Mikro dan Kecil Pada Kegiatan Pengadaan Barang/Jasa Pemerintah Daerah*. Medan: Enam Media.

The legal facts in Labuhan Batu Regency, there were violations of the law. This was emphasized because the Regent of Labuhan Batu accepted bribes related to the procurement of goods/services that had been prepared from contractors through an individual with the initials R.S. who is a trusted person.

Based on Law Number 20 of 2001, things that are categorized as criminal acts of corruption:

1. "Corruption with state financial losses;
2. Bribery;
3. Embezzlement in office;
4. Extortion;
5. Fraudulent acts;
6. Conflict of interest in procurement;
7. Gratification"<sup>14</sup>

The legal fact of accepting bribes related to the procurement of goods/services, based on Law Number 20 of 2001, is a criminal act, which violates the provisions of Article 12 B. Article 12 B of Law Number 20 of 2001, stipulates that:

1. Any gratification to a Civil Servant or State Administrator is considered a bribe, if it is related to his/her position and which is contrary to his/her obligations or duties, with the following provisions:
  - a. With a value of Rp. 10,000,000.00- (Ten Million Rupiah) or more, proof that the gratification is not a bribe is carried out by the recipient of the gratification;
  - b. With a value of less than Rp. 10,000,000.00- (Ten Million Rupiah), proof that the gratification is a bribe is carried out by the Public Prosecutor;
2. The criminal penalty for Civil Servants or State Administrators as referred to in paragraph (1) is life imprisonment or a minimum imprisonment of 4 (four) years and a maximum of 20 (twenty) years, and a fine of at least Rp. 200,000,000.00- (Two Hundred Million Rupiah) and at most Rp. 1,000,000,000.00- (One Billion Rupiah)".

---

<sup>14</sup> Saragih, D. & Naldo, R.A.C. (2024). Kebijakan Non Penal Guna Pencegahan Pemungutan Liar Dana Bantuan Sosial. *Journal Recht*. 3(2): 3.

The crime committed by the Regent of Labuhan Batu is a criminal act of corruption. Corruption is a crime that violates the right to welfare and social justice, which is the constitutional right of all Indonesian people.<sup>15</sup>

Regarding the definition of the term "criminal act", according to Moeljatno: "A criminal act/criminal act is an act that is prohibited by a legal rule, the prohibition of which is accompanied by a threat/sanction in the form of a certain penalty, for anyone who violates the prohibition. The prohibition is directed at the act (a condition or incident caused by a person's behavior), while the threat of a penalty is directed at the person who caused the incident.<sup>16</sup>

In order for an action to be categorized as a crime, it must meet the following requirements:

1. There must be an action carried out by a person;
2. The action is in accordance with that formulated in the laws and regulations;
3. There is an error that can be accounted for;
4. There is a threat of punishment (sanction).<sup>17</sup>

Actions that do not meet any of these conditions cannot be punished because there are 2 (two) reasons that eliminate the punishment:

1. Justifying reasons (*rechtvaardigingsgrond*);
2. Forgiving reasons (*schulduitsluitingsgrond*)<sup>18</sup>

Regarding the legal fact of accepting bribes related to the procurement of goods/services, then with the fulfillment of the objective elements and subjective elements of the crime, criminal liability must be applied to the Regent of Labuhan Batu. In order to apply criminal liability, law enforcement is carried out.

Regarding law enforcement, Soerjono Soekanto has put forward a theory. According to Soerjono Soekanto: "Law enforcement is an activity to harmonize the relationship between various values that are outlined in various rules, various solid views and embody them in attitudes, actions as a

---

<sup>15</sup> Sianturi, R.H., et.al. (2024). Pertanggungjawaban Oknum Pegawai Komisi Pemberantasan Korupsi Sebab Penggelapan Barang Bukti. *Jurnal Ilmiah Advokasi*. 12(4), hlm 787.

<sup>16</sup> Moeljatno. (2002). *Asas-asas Hukum Pidana*. Jakarta, Rineka Cipta, hlm.54

<sup>17</sup> Daliyo, J.B. (2001). *Pengantar Hukum Indonesia*. Jakarta: Prehallindo, hlm.93

<sup>18</sup> Purba, I.R. & Naldo, R.A.C. (2024). *Penegakan Hukum Kejahatan Pencurian Buah Kelapa Sawit Korporasi*. Banyumas: Pena Persada Kerta Utama.

series of final stage value descriptions to create peace in social life.<sup>19</sup> Law enforcement must pay attention to legal certainty, legal benefits, legal justice and legal guarantees.<sup>20</sup>

Regarding criminal liability, it can be interpreted as the continuation of objective blame that exists in a criminal act, and subjectively fulfills the requirements for the person who is the alleged perpetrator to be punished for his actions.<sup>21</sup> A person has criminal liability if he has committed a wrongful act because it is against the law. Criminal liability is a mechanism created to react to a violation of an act.<sup>22</sup>

Dwidja Priyatno has put forward the Theory of Criminal Responsibility. According to Dwidja Priyatno: "Criminal responsibility cannot be separated from criminal acts. Criminal acts only indicate the prohibition of an action. Criminal acts do not stand alone, it means when there is criminal responsibility. This means that everyone who commits a crime must automatically be punished. In order to be punished there must be criminal responsibility. Criminal responsibility arises with the continuation of objective criticism (*verwijbaardheid*) against actions that are declared as criminal acts based on the applicable Criminal Law, and subjectively to the perpetrator who meets the requirements to be subject to criminal penalties for his actions."<sup>23</sup>

Based on the Theory of Criminal Responsibility put forward by Dwidja Priyatno, the criminal responsibility of the Regent of Labuhan Batu was born with the continuation of objective criticism of the action (accepting bribes) which was stated as a criminal act based on Law Number 20 of 2001 and related laws and regulations objectively. Subjectively to the Regent of Labuhan Batu who in fact meets the requirements for the application of criminal responsibility because of his actions in accepting bribes from contractors related to the procurement of goods/services.

Law enforcement has been carried out against the Regent of Labuhan Batu in order to apply criminal responsibility. The application of criminal responsibility through law enforcement carried out by law enforcement officers, of course, culminates in the Judicial Institution.

---

<sup>19</sup> *Ibid.*

<sup>20</sup> Ishaq. (2009). *Dasar-dasar Ilmu Hukum*. Jakarta: Sinar Grafika, hlm. 43

<sup>21</sup> Naldo, *Eigen Richting Massa*. Sumedang: Mega Press Nusantara, hlm. 163-164

<sup>22</sup> *Ibid*, hlm.89

<sup>23</sup> Priyatno, D. (2017). *Sistem Pertanggungjawaban Pidana Korporasi Dalam Kebijakan Legislasi*. Depok: Kencana, hlm. 29



Regarding the concept of implementing criminal responsibility through a decision of the Judicial Institution that has permanent and definite legal force, according to Satjipto Rahardjo: "An important part of the trial process occurs when the Judge examines and tries a case. Basically, what the Judge does is examine the reality that occurs, and punish it with the applicable laws and regulations. The decision made by the Judge is the peak of law enforcement."<sup>24</sup>

Based on the Decision of the Medan District Court Number: 32/PID.SUS-TPK/2024/PN Mdn dated September 25, 2024, the Panel of Judges of the Medan District Court who examined and tried the case, chose the first charge (Article 12 letter B in conjunction with Article 18 of Law Number 20 of 2001 in conjunction with Article 55 paragraph (1) to 1 in conjunction with Article 65 paragraph (1) of Law Number 1 of 1946 concerning Criminal Law Regulations (Law Number 1 of 1946/KUHP). The criminal liability applied is:

1. Imprisonment for 6 (six) years;
2. A fine of IDR 300,000,000.00- (Three Hundred Million Rupiah), which if not paid is replaced by imprisonment for 6 (six) months;
3. Additional punishment of paying compensation of IDR 368,200,000.00- (Three Hundred Sixty Eight Million Two Hundred Thousand Rupiah), which if not paid within a maximum of 1 (one) month after the verdict has permanent legal force, then the property can be confiscated by the Prosecutor and auctioned to cover the replacement money, and if there is not enough property to pay, then it will be replaced with a prison sentence of 2 (two) years;
4. Additional criminal penalties in the form of revocation of the right to be elected as a member of the People's Representative Council of the Republic of Indonesia (DPR RI), Regional People's Representative Council (DPRD) of the Province and Regency/City DPRD, for 3 (three) years after completing the sentence.

Against the verdict, the Regent of Labuhan Batu filed an appeal. The Panel of Judges of the Medan High Court who examined and tried the case, applied criminal liability:

1. Imprisonment for 4 (four) years;

---

<sup>24</sup> Rahardjo, S. (2006). Ilmu Hukum. Bandung: Citra Aditya Bakti, hlm. 182-183.

2. A fine of Rp. 200,000,000.00- (Two Hundred Million Rupiah), which if not paid is replaced by imprisonment for 6 (six) months;
3. Additional punishment of paying compensation of Rp. 2,426,500,000.00- (Two Billion Four Hundred Twenty Six Million Five Hundred Thousand Rupiah), which if not paid no later than 1 (one) month after the verdict has permanent legal force, the property can be confiscated by the Prosecutor and auctioned to cover the compensation, and if he does not have sufficient property to pay, it is replaced with imprisonment for 3 (three) years.
4. Additional criminal penalties in the form of revocation of the right to be elected as a member of the Indonesian House of Representatives, Provincial DPRD and Regency/City DPRD, for 3 (three) years after completing the sentence.

## CONCLUSION

1. Fulfillment of the need for goods/services is an important part that cannot be separated from the implementation of regional government in Labuhan Batu Regency. In order to fulfill it, it can be done through procurement of goods/services. Regarding procurement of goods/services, it is expected that in the implementation there will be no violations of the law. The legal fact is that there was a violation of the law, because the Regent of Labuhan Batu accepted bribes from contractors through an individual with the initials R.S., which in fact violated the provisions of Article 12 B of Law Number 20 of 2001.
2. Law enforcement has been carried out against the Regent of Labuhan Batu in order to apply criminal liability. Based on the decision made by the Panel of Judges of the Medan High Court, the Regent of Labuhan Batu was subject to criminal liability:
  - a. Imprisonment for 4 (four) years;
  - b. A fine of Rp. 200,000,000.00- (Two Hundred Million Rupiah), which if not paid is replaced by imprisonment for 6 (six) months;
  - c. Additional punishment of paying compensation of Rp. 2,426,500,000.00- (Two Billion Four Hundred Twenty Six Million Five Hundred Thousand Rupiah), which if not paid within 1 (one) month after the verdict has permanent legal force, the property can be confiscated by the Prosecutor and auctioned to cover the replacement money, and if they do not have sufficient property to pay, it will be replaced with imprisonment for 3 (three) years.

- d. Additional punishment in the form of revocation of the right to be elected as a member of the Indonesian House of Representatives, Provincial DPRD and Regency/City DPRD, for 3 (three) years after completing the sentence.

## REFERENCES

### 1. Book:

- Daliyo, J.B. (2001). Pengantar Hukum Indonesia. Jakarta: Prehallindo.
- Ishaq. (2009). Dasar-dasar Ilmu Hukum. Jakarta: Sinar Grafika.
- Moeljatno. (2002). Asas-asas Hukum Pidana. Jakarta, Rineka Cipta.
- Palguna, I.D.G. (2013). Pengaduan Konstitusional (Constitutional Complaint) Upaya Hukum Terhadap Pelanggaran Hak-hak Konstitusional Warga Negara. Jakarta: Sinar Grafika.
- Panjaitan, W.M. & Naldo, R.A.C. (2025). Pertanggungjawaban Anak yang Berkonflik Dengan Hukum Sebab Persetubuhan. Malang: Literasi Nusantara.
- Priyatno, D. (2017). Sistem Pertanggungjawaban Pidana Korporasi Dalam Kebijakan Legislasi. Depok: Kencana.
- Purba, I.R. & Naldo, R.A.C. (2024). Penegakan Hukum Kejahatan Pencurian Buah Kelapa Sawit Korporasi. Banyumas: Pena Persada Kerta Utama.
- Rahardjo, S. (2006). Ilmu Hukum. Bandung: Citra Aditya Bakti.
- Soekanto, S. & Mamuji, S. (2004). Penelitian Hukum Normatif. Jakarta: Raja Grafindo Persada.
- Soemitro, R.S. (1988). Metodologi Penelitian Hukum dan Jurimetri. Jakarta: Ghalia Indonesia.
- Sunggono, B. (2002). Penelitian Hukum (Suatu Pengantar). Jakarta: Raja Grafindo Persada.
- Syahrin, A., et.al. (2019). Ilmu Hukum Indonesia (Suatu Pengantar). Depok: Rajawali Pers.

### 2. Journal:

- Naldo, R.A.C. & Purba, M. (2019). Pertanggungjawaban Mutlak Korporasi Sebab Kebakaran Lahan Mengakibatkan Pencemaran/Kerusakan Lingkungan Hidup. Jurnal Ilmiah Penegakan Hukum. 5(1): 43.
- ....., et.al. (2021). Kepastian Hukum Prioritas Pemberdayaan Usaha Mikro dan Kecil Pada Kegiatan Pengadaan Barang/Jasa Pemerintah Daerah. Medan: Enam Media.
- Saragih, D. & Naldo, R.A.C. (2024). Kebijakan Non Penal Guna Pencegahan Pemungutan Liar Dana Bantuan Sosial. Journal Recht. 3(2): 3.

Saragih, R. & Naldo, R.A.C. (2023). Pertanggungjawaban Hukum Direksi Sebab Tidak Menerapkan Asas Kehati-hatian Dalam Menyalurkan Mudharabah. *Jurnal Ilmiah Advokasi*. 11(2): 295.

Sianturi, R.H., et.al. (2024). Pertanggungjawaban Oknum Pegawai Komisi Pemberantasan Korupsi Sebab Penggelapan Barang Bukti. *Jurnal Ilmiah Advokasi*. 12(4): 787.

### **3. Constitution**

Undang-Undang Dasar Negara Republik Indonesia Tahun 1945.

Undang-Undang Nomor 1 Tahun 1946 Tentang Peraturan Hukum Pidana.

Undang-Undang Nomor 20 Tahun 2001 Tentang Pemberantasan Tindak Pidana Korupsi.

Undang-Undang Nomor 9 Tahun 2015 Tentang Pemerintahan Daerah.

Peraturan Presiden Nomor 12 Tahun 2021 Tentang Pengadaan Barang/Jasa Pemerintah.

### **4. Internet**

Nasution. M.S. (2024). PN Medan Mulai Adili Mantan Bupati Labuhan Batu Terkait Korupsi. <https://www.antaraneews.com/berita/4129350/pn-medan-mulai-adili-mantan-bupati-labuhanbatu-terkait-korupsi>. Bahan Diakses di Medan, Kamis, 20 Februari 2025, Jam 01.<sup>29</sup> WIB.