

The Role of Penal Mediation in Achieving Justice in Fraud and Embezzlement

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Article Info	Abstract
Received: 2025-7-04 Revised: 2025-9-15 Accepted: 2025-10-06 Keywords: Penal Mediation, Justice, Fraud and Embezzlement	<i>This study examines the implementation of penal mediation in Indonesia's criminal justice system, particularly in fraud and embezzlement cases. Although recognized under the Indonesian National Police Chief Circular Letter No. SE/8/VII/2018, its practice struggles to balance justice, legal certainty, and utility. Using a normative juridical approach and Lawrence M. Friedman's legal system theory, the study finds gaps between theory and practice due to weak legal foundations, fragmented institutional authority, and a rigid positivist legal culture. It proposes a reform framework emphasizing: (1) legal substance strengthening through clear legislation, (2) structural reform via certified mediators and system integration, and (3) cultural adaptation reflecting local wisdom, to ensure a legitimate, fair, and effective penal mediation mechanism.</i>

I. Introduction

The Indonesian criminal justice system adopts the Integrated Criminal Justice System (ICJS), a paradigm consisting of four subsystems, investigation by the police, prosecution by the public prosecutor, adjudication by the court, and the execution of court decisions by the prosecutor and correctional institutions within an integrated procedural mechanism. These four institutions principally operate by upholding values of collaboration, institutional cohesiveness, and a sincere, dedicated, and constructive work ethic among law enforcement officials (Mardjono Reksodipoetra, 2014). According to the Minister of Justice, the criminal justice system constitutes an integrated mechanism involving various institutions which, despite having diverse functions, are expected to work synergistically within a common framework of understanding regarding the

ultimate objectives of the system (Kadri Husin & Budi Rizki H, 2016).

Traditionally, the ICJS has been positivistic and offender-oriented, thereby often neglecting the interests of victims and the values of substantive justice. This conventional approach is not always effective in resolving criminal cases that are rooted in civil relations, such as fraud (Article 378 of the Indonesian Penal Code) and embezzlement (Article 372 of the Indonesian Penal Code). As a result, victims are frequently trapped in the complexity of legal proceedings that fail to guarantee restitution or the restoration of their substantive rights. This phenomenon demonstrates a dissonance between formal-procedural law enforcement and the demands of restorative justice. The dominance of the positivistic paradigm in the ICJS not only disregards victims' interests but also generates systemic inefficiency. Data from the Supreme Court of the Republic of Indonesia during the period 2008–2021 further indicate a consistent increase in fraud cases (2025). This phenomenon indicates the failure of the system to achieve restorative justice and to prevent the escalation of criminal offenses.

To address this issue, Muladi proposed emphasizing a dialogical and participatory mechanism between victims and offenders, implemented through Alternative Dispute Resolution (ADR) (Muladi, 2022). ADR encompasses various methods of settling disputes outside the court, generally including mediation, arbitration, and neutral evaluation¹. The core concept behind this approach is restorative justice, which views crime as an act that causes harm to victims. The process involves the victims, offenders, and affected community members, and is typically facilitated by a neutral third party (NY Courts.gov, 2025). Case resolution must include all relevant stakeholders while providing necessary assistance and support to both victims and offenders (United Nation, 2020). This aligns with Zehr's three pillars of restorative justice, addressing harm and needs, fulfilling obligations to repair, and ensuring stakeholder participation (Howard Zehr, 2002).

One form of ADR within the criminal justice system is penal mediation. According to Stuart M. Widman, penal mediation is a process where a mediator facilitates communication and negotiation between parties to reach a voluntary settlement (Sri Hartanto, 2019). Historically, Indonesian investigators have acted as mediators based on discretionary authority. This practice later gained formal grounding through the Chief of Police Telegram No. Pol: B/3022/XII/2009/SDEOPS on Case Handling via ADR, and was further reinforced by the Chief of Police Circular Letter No. SE/8/VII/2018 on the Application of Restorative Justice. However, its implementation faces several significant obstacles:

- a) The limited timeframe for penal mediation, which coincides with the deadline for submitting the SPDP (Notification of Commencement of Investigation) to the prosecutor's office.

- b) SE/8/VII/2018 does not specify the maximum financial loss that can be resolved through restorative justice.
- c) Regulatory dualism, where the resolution of certain criminal cases in Aceh refers not to SE/8/VII/2018 but to Qanun No. 9/2009.
- d) The positivistic mindset of both law enforcement officers and the public, which continues to prioritize conventional punishment and procedural formalities over the substantive protection of victims.

In principle, penal mediation should be applied selectively to criminal offenses arising from contractual relations, particularly embezzlement and fraud. This approach is supported by five substantive arguments, as follows:

- a) Inherently, these criminal acts are non-violent and financially oriented, thereby rendering them more compatible with a restorative approach (K.H. Spencer Pickett & Jennifer Pickett, 2002).
- b) Within the context of contractual relationships, civil aspects are more dominant than criminal ones, making non-penal settlement mechanisms more relevant (Yahman, 2016)
- c) Legal practice has acknowledged settlement mechanisms outside the criminal justice system for offenses of embezzlement and fraud.
- d) The essence of property or asset-related crimes lies in the restitution of the victim's losses rather than the mere punishment of the offender (Yahman, 2016).

Based on the problem background outlined above, this study formulates two primary research questions. First, how are the principles of justice, legal certainty, and utility integrated within penal mediation for criminal offenses of fraud and embezzlement? Second, how can the concept of penal mediation be reformulated within the Integrated Criminal Justice System in Indonesia?

Although penal mediation has been regulated in a limited manner through the Chief of Police Circular No. SE/8/VII / 2018, its application in cases of fraud and embezzlement has not been able to optimally realize substantive justice for the parties. There is a gap between the ideal role of penal mediation as a means of restorative justice with its implementation practices that are still hampered by: the gap that occurs so that it is interesting to examine is the absence of a strong legal basis (there is no regulation in formal law). Authorities are out of sync between law enforcement agencies, so the process of penal mediation is often unsustainable or unrecognized as a result. A positivistic legal culture that still focuses on punishment, not recovery. Thus, the main gap is the lack of realization of the effective role of penal mediation in achieving substantive justice in fraud

and embezzlement cases, although normatively penal mediation is expected to be a means of fair, definite, and beneficial settlement.

Theoretically, this study is grounded in Gustav Radbruch's Theory of Justice and Law as well as Lawrence M. Friedman's legal system theory, which are employed to analyze the relationship between norms and the practice of law enforcement through three elements, structure, substance, and legal culture. Penal mediation theory is applied to examine the implementation of restorative justice, particularly in terms of restoring victims' rights and achieving agreements outside the courtroom. The purpose is to analyze the integration of the principles of justice, legal certainty, and utility within penal mediation, and to reformulate its concept as an integral part of the Indonesian criminal justice system.

2. Research Method

This research employs a normative juridical method with a doctrinal approach that integrates three perspectives, the statute approach, the case approach, and the analytical approach. Data collection was conducted through a comprehensive literature study of primary, secondary, and tertiary legal materials. The data analysis was carried out qualitatively and descriptively through three methodological stages, namely:

- a) Qualitative juridical analysis, by applying legal principles to understand the philosophy underlying penal mediation policies.
- b) Synchronization analysis, to examine the consistency between legal materials, legal theories, and related legal principles.
- c) Systematic and teleological legal interpretation.

Subsequently, the study analyzes the system of penal mediation by employing the three components of the legal system, structure, substance, and legal culture. Through this method, the research aims to provide a comprehensive and practical academic contribution to the development of penal mediation within the Indonesian criminal justice system.

3. Results and Discussion

A. The Integration of the Principles of Justice, Legal Certainty, and Utility in the Application of Penal Mediation to Fraud and Embezzlement Offenses

The concept of restorative justice in Indonesia is closely related to the essence of the rule of law following the constitutional amendments of 1999–2002 (Abdul Wahid, 2002). This approach represents the objectives of punishment that aim not only to provide reparation but also to prevent the recurrence of criminal acts (Martian Lovan, 2020). Although the principle of restorative justice has been implemented at various stages of the judicial process, its legal basis remains partial and has not yet been integrated into a comprehensive and coherent regulatory framework (Hafrida, 2024). This approach does not merely address the repair of harm in the settlement of criminal cases but also

elaborates on the concept of restorative justice within penal mediation, which encompasses two perspectives, the ethical perspective and justice from a juridical perspective (Lode Walgrave, 2004). The explanation of justice in this context consists of two dimensions, namely:

- a) **Substantive Ethical Justice:** This concept refers to the principles of *equity* and *fair trial*, which emphasize moral balance in assessing truth and wrongdoing. In cases of fraud and embezzlement, substantive ethical justice is realized through the provision of proportional compensation as restitution for victims, while simultaneously preventing penal mediation from being transformed into an instrument of extortion. Penal mediation has two orientations, namely the protection of victims' rights and the correction and rehabilitation of offenders. The principle of restorative justice encourages the offender's acknowledgment of responsibility and involves all parties in achieving the most appropriate settlement (Hafrida & Usman, 2024). This approach represents a paradigmatic shift in the concept of justice, from retributive (punitive) justice toward restorative (restorative) justice.
- b) **Juridical Ethical Justice:** Juridical justice emphasizes procedural aspects that ensure penal mediation operates within the framework of applicable law. Without a solid legal foundation, mediation agreements lose legitimacy and certainty of enforcement. Therefore, penal mediation must integrate substantive justice (recovery for victims and offenders) with procedural justice (compliance with legal norms), thereby creating a more holistic form of justice compared to conventional judicial proceedings.

The principle of legal justice brings the discourse toward the principle of legal certainty in penal mediation. Legal certainty in penal mediation requires:

- a) **Formalization** through clear and integrated regulations within statutory provisions of the Indonesian criminal justice system, in order to provide certainty regarding the application of penal mediation and to prevent disparities.
- b) **Limitation of discretionary authority** of law enforcement officials to avoid inconsistency and injustice, as in practice, investigators' discretionary power often prioritizes policy objectives over strict adherence to existing law (Sahata Manalu, 2020). The utility of penal mediation emerges as the outcome of integrating the principles of justice and legal certainty. Its advantages include direct recovery through comprehensive compensation, restoration of dignity, and the potential for reconciliation. For offenders, it provides the opportunity to avoid the stigma of criminal punishment and to engage in constructive self-correction. This approach creates a *win-win solution*, meaning that although one party is guilty and another is harmed, the settlement of the case is expected to provide justice for both the victim and the offender (T Teguh Hariyono, 2021).

Fraud and embezzlement are economic-motivated criminal acts in which the offender does not intend to cause physical harm to the victim. In fact, embezzlement is often utilized in civil disputes, such as breaches of contract in hire-purchase or leasing agreements, where the debtor fails to fulfill payment obligations (Febrian Valentino Musak, 2017). Instead of filing a lawsuit in civil court, creditors frequently report the debtor for the criminal offense of embezzlement (Juni Kristian, 2021). Penal mediation emerges as a compatible

alternative mechanism for resolving these two offenses, which can be examined through three aspects:

- a) The aspect of the parties involved. Penal mediation is oriented toward restoring the relationship between the victim and the offender, which is often based on a prior relationship of trust. This approach creates a space for dialogue facilitated by a neutral third party to rebuild trust and sustain business relations. In practice, normative legal processes impose punishment in the name of justice, yet the victim does not experience a genuine sense of justice because their rights are not substantively protected (I Ketut Sudira, 2020).
- b) The aspect of justice for victims. In criminal proceedings, victims of fraud and embezzlement are not directly involved in advocating for their rights (Nirmalasari, 2018). Unlike conventional criminal trials, which tend to render victims passive, penal mediation positions the victim as an active subject whose interests become the center of the settlement process, thereby enabling substantive justice to be meaningfully achieved.
- c) The aspect of purpose. The primary aim of penal mediation is to realize restorative justice by restoring losses and re-establishing social balance. The form of accountability adopted is restorative justice, which focuses on repairing harm, rather than retributive justice, which emphasizes punishment. Accordingly, penal mediation offers a more substantive and meaningful resolution for the parties involved compared to conventional criminal justice processes.

B. Reformulating the Legal Framework of Penal Mediation in Indonesia's Criminal Justice System

The discourse on legal modernization is inherently linked to the concept of legal system reformulation. Reformulating the legislative system is a crucial step towards establishing a responsive and adaptive legal order, thereby strengthening the legal foundation and enhancing societal welfare (Sunny Ummul F & Putri Anjelina, 2024). Legal modernization requires a legal system reformulation that is holistically transformative, going beyond mere amendment, to create a legal framework aligned with societal values of justice and the demands of national development. Dynamic law must align with societal developments. The most tangible legal changes occur when they are accompanied by a society's social history and its responsiveness to the prevailing law (M. Harun, 2016). This study reveals a misalignment between the principles of justice, legal certainty, and utility in the application of penal mediation. Consequently, the author recommends systematic reform of the legal substance, structure, and culture. As a system, penal mediation can be analyzed through three main components, input, process, and output. The input for the penal mediation process consists of three primary elements:

- a) A confirmed perpetrator, identified through initial investigation, is a prerequisite that gives mediation its "penal" character.
- b) The victim's confirmed material loss, verified during the investigation, serves as the primary trigger for mediation.
- c) The voluntary consensus of the parties involved forms the essential foundation

for the restorative process and prevents unilateral agreements.

d) Following the process stage, the final component of penal mediation as a system is the output. There are two possible outputs, success (termination of the investigation) or failure (continuation of the legal process). Based on Lawrence M. Friedman's doctrine, the penal mediation system can be analyzed using three components (Sibolga, 2025):

- 1) **Structure** : This refers to the law enforcement apparatus, particularly investigators, who are influenced by regulations, institutional factors, and discretionary authority.
- 2) **Substance**: This encompasses the regulatory framework governing penal mediation, substantive criminal law, and victim protection.
- 3) **Legal Culture**: This includes the values, attitudes, and beliefs of investigators, offenders, and victims.

Incompatible cultural elements, such as a preference for customary or familial dispute resolution, can hinder the effectiveness of penal mediation. This is attributable to five critical problems within the substance component of the law, namely (Lawrence. M. Friedman, 1975):

- a) **Structure** refers to the law enforcement apparatus, particularly investigators, who are influenced by regulations, institutional factors, and discretionary authority.
- b) **Substance** encompasses the regulatory framework governing penal mediation, substantive criminal law, and victim protection.
- c) **Legal culture** includes the values, attitudes, and beliefs of investigators, offenders, and victims.

Incompatible cultural elements, such as a preference for customary or familial dispute resolution, can hinder the effectiveness of penal mediation. This is attributable to five critical problems within the legal substance component, namely:

- a) The structural component refers to law enforcement officials, particularly investigators, who are influenced by regulatory frameworks, institutional factors, and discretionary authority.
- b) The substantive component encompasses the regulatory framework governing penal mediation, substantive criminal law, and the protection of victims.
- c) The cultural component includes the values, attitudes, and beliefs of investigators, offenders, and victims.

Incompatible cultural preferences, such as prioritizing customary or familial dispute resolution, may hinder the effectiveness of penal mediation. This issue arises primarily due to five critical problems within the substantive legal component, namely:

- 1) **Absence of uniform parameters**. The disparity in penal mediation requirements creates potential legal uncertainty. To address this problem, the researcher proposes the standardization of requirements into two categories, formal and material. Formal requirements include:
 - a. Sufficient evidence is available.
 - b. A written request for reconciliation is submitted by both the complainant and the reported party.
 - c. The offender admits to committing the criminal act.
 - d. The mediation process is undertaken voluntarily by the parties.
 - e. A mutual agreement is reached by both parties.

- f. For community-related offenses, approval from community representatives is required.
- g. Recommendations are provided by the mediator.
- h. Notification is given to the public prosecutor.

Material requirements include:

- a. The offender is not a recidivist
 - b. The harm caused is of a private nature and does not involve state finances.
 - c. The proceeds of the crime are not used for terrorism-related purposes.
 - d. The offense committed does not result in human casualties.
 - e.
1. Lack of a comprehensive legal framework. The current arrangements, which are fragmented across institutional regulations (e.g., Police Regulations/Prosecutor's Regulations), should be elevated to statutory law to ensure legal certainty and legitimacy.
 2. Inadequate victim protection. It is necessary to adopt the principle of informed consent, which guarantees the victim's agreement, access to complete information, consideration of the victim's best interests, and the confidentiality of personal data.
 3. Absence of guaranteed informed consent. Law enforcement officers must provide complete information and require a written mediation request as documentary evidence of the parties' understanding of the mediation process and its legal consequences.
 4. Ambiguity in the use of regulatory templates. Standardized templates often create ambiguity. Therefore, agreements should be facilitated by certified professional mediators to ensure that the actual needs of the parties are addressed and that the legal force of the agreement is clear.

Furthermore, the researcher recommends reformulation of the structural component of penal mediation, which involves two principal issues:

1. Institutional bias and fragmentation. Mediators currently originate from within law enforcement institutions, which creates the potential for bias and conflicts of interest. First, the appointment of independent and certified external mediators is necessary to guarantee neutrality. Second, fragmented mediation authority between institutions (the Police and the Prosecutor's Office) has resulted in redundancy and discontinuity. As a solution, the researcher proposes the integration and synchronization of penal mediation into the unified criminal justice system. Mediation outcomes should be considered at every stage of the process (investigation, prosecution, trial) rather than serving merely as grounds for terminating proceedings, similar to the model implemented in the Netherlands.
2. Cultural-contextual reform. The application of penal mediation without consideration of sociocultural contexts may reduce its effectiveness. Therefore, a cultural-contextual approach is needed, involving local stakeholders (such as traditional leaders) and assessing the compatibility of penal mediation with the community's characteristics and historical patterns of conflict

Accordingly, to address these challenges, a holistic systemic reformulation is required. This encompasses strengthening substantive law through statutory regulation, restructuring integrated institutional frameworks, and adopting adaptive cultural

approaches to establish a penal mediation system that is legitimate, fair, and effective.

4. Conclusion and Recommendation

Based on a comprehensive analysis of the implementation of penal mediation within the Indonesian criminal justice system, particularly concerning fraud and embezzlement offenses, this study concludes the following. Penal mediation holds significant potential for integrating the principles of justice, legal certainty, and utility in resolving these crimes. However, its current implementation faces substantial obstacles across multiple dimensions. At the substantive level, the regulatory framework remains incomplete and lacks comprehensiveness. Structurally, significant challenges persist concerning the capacity and independence of mediators, compounded by authority fragmented across multiple institutions. Furthermore, the prevailing legal culture, characterized by a persistent preference among law enforcement officials and the wider society for a retributive approach, presents a significant barrier. Consequently, the effectiveness of penal mediation is impeded by systemic dysfunction within the three components of Friedman's legal system model. In terms of substance, the existing regulatory framework is deemed inadequate due to the absence of uniform parameters, a comprehensive legal umbrella, and guarantees for victim protection through informed consent. At the structural level, the primary weaknesses lie in the potential bias of internal mediators and the fragmented authority among law enforcement institutions. Meanwhile, in the realm of legal culture, the application of penal mediation often overlooks specific local socio-cultural contexts.

To address the systemic dysfunction impeding penal mediation, a holistic and multi-dimensional reformulation is imperative. First, a comprehensive legal umbrella in the form of a specific statute must be enacted to strengthen the legal substance. This law should standardize formal and material requirements and institutionalize robust victim protection mechanisms grounded in the principle of informed consent, ensuring clarity, legal certainty, and a victim-centered approach. Concurrently, the legal structure requires fundamental restructuring through the establishment of a certification framework for independent mediators to guarantee neutrality and professionalism, coupled with the full procedural integration of penal mediation into the Integrated Criminal Justice System.

This integration would allow mediation outcomes to be formally recognized and considered at every stage of the criminal process, thereby overcoming institutional fragmentation. Finally, to transform the legal culture, a cultural-contextual approach must be adopted by actively involving local stakeholders and tailoring mediation processes to align with local social characteristics and wisdom. The success of this systemic reform hinges on the synergistic strengthening of all three components substance, structure, and culture to transform penal mediation from a theoretical alternative into an effective, legitimate, and restorative pillar of the Indonesian criminal justice system

REFERENCES

- Hafrida & Usman. *Keadilan Restoratif (Restorative Justice dalam Sistem Peradilan Pidana)*. Sleman: Deepublish, 2024.
- Howard Zehr & Ali Gohar. *The Little Book of Restorative Justice*. United States: Good Books, 2002.
- I Ketut Sudira. *Hak Reparasi Saksi dan Korban dalam Proses Penyelesaian Perkara Pidana dari Perspektif Viktimologi*. Yogyakarta: UII Press, 2020.
- Kadri Husin & Budi Rizki H. *Sistem Peradilan Pidana di Indonesia*. Jakarta: Sinar Grafika, 2016. Hlm. 7
- K.H. Spencer Pickett & Jennifer Pickett. *Financial Crime Investigation and Control*. New York: , John Wiley and Sons, Inc, 2002.
- Lawrence. M. Friedman. *The Legal System: A Social Science Perspective*. New York: Russel Sage Foundation, 1975
- Lilik Mulyadi. *Mediasi Penal dalam Sistem Peradilan Pidana Indonesia*. Bandung: PT. Alumni, Bandung, 2005.
- Mardjono Reksodipoetra. *Sistem Peradilan Pidana Indonesia (Peran Penegak Hukum Melawan Kejahatan)*. Jakarta: Pusat Pelayanan Keadilan dan Pengabdian Hukum Universitas Indonesia, 2014.
- Muladi. *Hak Asasi Manusia, Politik dan Sistem Peradilan Pidana*. Semarang: Badan Penerbit Universitas Diponegoro, 2002.
- Nirmalasari, dkk. *Mediasi Penal sebagai Alternatif Penyelesaian Perkara Tindak Pidana Lingkungan Hidup pada Lahan Basah di Kalimantan Selatan*. Bandung: Nusa Media, 2018.
- United Nation Office on Drugs and Crime. *Handbook on Restorative Justice Programmes*, United Nation Publication. Vienna: UN-TIJ, 2020.
- Yahman. *Cara Mudah Memahami Wanprestasi & Penipuan dalam Hubungan Kontrak Komersial*. Jakarta: Kencana, 2016.
- Abdul Wahid, “Keadilan Restoratif: Upaya Menemukan Keadilan Substantif”, *Jurnal Ius Constituendum* 07 no. 3 (Oktober 2002):
- Febrian Valentino Musak, “Tindak Pidana Penggelapan dalam Perjanjian Sewa-Beli Kendaraan Bermotor”, *Lex et Societatis* 05 no. 5 (Oktober 2017)

- Juni Kristian, dkk., “Tuntutan Tindak Pidana Penggelapan terhadap Perbuatan Wanprestasi”, *Juris Studia Jurnal Kajian Hukum* 02 no. 2 (Juni 2021).
- Lode Walgrave, “Restoration in Youth Justice”, *The University of Chicago Press Journal* 31 (Januari 2004).
- Martian Iovan, “Analysis of the Connection Between Law and Morals, Between Customs and Contemporaneity”, *Journal of Legal Studies* 25 (June 2020).
- M. Harun, “Reformulasi Kebijakan Hukum Terhadap Penegakan Hukum Pidana Pemilu Dalam Menjaga Kedaulatan Negara”, *Jurnal RechtsVinding Media Pembinaan Hukum Nasional* 5, no. 1, (April 2016).
- Sahata Manalu, “Analisis Yuridis Tindakan Diskresi Kepolisian pada Tahap Penyidikan”, *Jurnal Fiat Iustitia* 01 no. 01 (September 2020).
- Sri Hartanto, Indah Sri Utari & Ridwan Arifin, “Implementation of Penal Mediation in The Perspective of Progressive Law (Study at the Semarang City Police Department)”, *Indonesian Journal of Criminal Law Studies* 04 no. 02, (2019).
- Sunny Ummul F & Putri Anjelina N.P, “Reformulasi Hukum Untuk Mewujudkan Sistem Perundang-undangan Adaptif dan Responsif”, *KNAPHTN-HAN* 02 no. 1 (Desember 2024).
- Teguh Hariyono, “Mediasi Penal Sebagai Alternatif Upaya Penyelesaian Perkara Pidana di Luar Pengadilan”, *Jurnal Penegakan Hukum dan Keadilan* 02 no. 1 (Maret 2021): Hlm. 4
- UNODC Economis and Social Council, “ECOSCOC Resolution 2002/12: Basic Principles on the Use of Restorative Justice Programmes in Criminal Matters”, 24 Juli 2002, Pasal 1 Angka 1
- MA, “Putusan Mahkamah Agung”,
<https://putusan3.mahkamahagung.go.id/search.html/?q=%22Penggelapan%20dan%20pencucian%20uang%22>, diakses pada 04 September 2025
- NYCourts.gov, “Alternative Dispute Resolution”,
https://ww2.nycourts.gov/ip/adr/What_Is_ADR.shtml, diakses pada 03 September 2025
- PN Sibolga, “Prosedur Mediasi: Perma No. 1 Tahun 2016 tentang Prosedur Mediasi di Pengadilan”,
<https://pn-sibolga.go.id/prosedur-mediasi>, diakses pada 04 September 2025