

Evidentiary of the Criminal Act of Corruption in Teleconference Trials during the Covid-19 Pandemic



Aryaguna

Faculty of Law, Universitas Pembangunan Nasional Veteran Jakarta
Jl. R.S. Fatmawati No. 1 South Jakarta 12450

ABSTRACT: The trial of corruption cases by teleconference is very vulnerable to manipulation of the trial or game cases that can obscure or change the actual facts, internet network connections. In addition, with atrial teleconference for judges, public prosecutors and legal advisors cannot see the direct response of the examined parties to determine the gesture in answering and giving reasons in answering questions, making it difficult to catch whether there has been a blurring of facts or not. The problems of this research are 1) How is the evidence in the trial of corruption cases by teleconference during the COVID-19 pandemic? 2) How should a case prove a corruption case teleconference during the COVID-19 pandemic? By using normative juridical research methods, it is known that 1) Supreme Court Regulation No. 4 of 2020 in principle has accommodated the process of evidentiary the trial of corruption cases and is legal according to law, but in practice not all cases of corruption can be proven by teleconference. 2) The process of evidentiary the trial of corruption cases by teleconference in the COVID-19 pandemic situation that should be carried out is optional so that in practice it does not need to be carried out by teleconference, this returns to the weight of the case being handled.

KEYWORDS: Evidence, Teleconference, Corruption, Covid-19

A. PREFACE

Coronavirus is a large family of viruses that cause diseases in humans and animals. In humans, it usually causes respiratory tract infections, ranging from the common cold to serious diseases such as Middle East Respiratory Syndrome (MERS) and Severe Acute Respiratory Syndrome (SARS). A new variant of coronavirus that was found in humans since the infamous incident in Wuhan, China, in December 2019, has been named Severe Acute Respiratory Syndrome Coronavirus 2 (SARS-COV2) and has been identified to cause the Coronavirus Disease-2019 (COVID-19).¹

The virus, which originated from Wuhan, China, has spread rapidly almost all over the world, including Indonesia. COVID-19 indirectly affects all aspects of societal movements, from restrictions on personal activities to large-scale social activities.² The side effect that is also affected is the field of law enforcement, especially in the implementation of trials in court where, since mid-March 2020 until now, the effects are still continuing.

The most affected trial-in-court activity due to the COVID-19 pandemic is the trial of criminal cases. With the reason of the limited detention period, this became the basis for conducting a teleconference trial based on the Cooperation Agreement between the Supreme Court of the Republic of Indonesia, the Attorney General's Office of the Republic of Indonesia and the Indonesian Ministry of Law and Human Rights regarding the Implementation of Trials Through Teleconference on April 13, 2020.

Furthermore, within the Attorney's Office environment, the trial using this teleconference facility refers to the instruction of the Attorney General of the Republic of Indonesia Number 5 of 2020 concerning Policies for the Implementation of Duties and Case Handling During the Prevention of the Spread of COVID-19 in the Attorney's Office of the Republic of Indonesia on March 27, 2020. The Instruction is accompanied by the Circular Letter of the Attorney General of the Republic of Indonesia Number 2 of 2020 concerning Adjustment of the Employee Work System in Efforts of the Spread of Coronavirus Disease (COVID-19) Prevention within the Attorney General's Office of the Republic of Indonesia (hereinafter abbreviated as SEJA No. 2 of 2020).³

Based on this, the Attorney General issued several important points that must be considered in handling criminal cases during the COVID-19 period, this is stated in the Circular Letter of the Attorney General of the Republic of Indonesia Number B-

¹ <https://www.kemkes.go.id/article/view/20030400008/FAQ-Coronavirus.html> accessed 6 April 2021

² Anggi Astari Amelia Putri & Dahlan Ali, *Keabsahan Pembuktian Perkara Pidana Dalam Sidang Yang Dilaksanakan Via Daring (Video Conference) Dalam Masa Pandemi Covid-19*, (Syiah Kuala Law Journal, Vol. 4, December 2020), page. 254

³ Dewi Rahmaningsih Nugroho & S. Suteki, *Membangun Budaya Hukum Persidangan Virtual (Studi Perkembangan Sidang Tindak Pidana Via Telekonferensi)*, (Jurnal Pembangunan Hukum Indonesia Vol. 2, No. 3, 2020), page. 292

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049/A/SUJA/03/2020 of 2020 concerning the Optimization of Duties, Functions, and Authorities Implementation Amid the Efforts to Prevent the Spread of COVID-19 (hereinafter abbreviated as SEJA No. B-049/A/SUJA/03/2020) which one of the points is to seek trial of criminal cases through video conference/live streaming facilities which in its implementation is going to be coordinated with the Head of the District Court and the Head of Detention/Prison Center;

Furthermore, on September 29, 2020, the Supreme Court has issued Supreme Court Regulation Number 4 of 2020 concerning Administration and Trial of Criminal Cases in Courts Electronically (hereinafter abbreviated as Perma or Supreme Court Regulation No. 4 of 2020)⁴. The regulation regulates the procedures for conducting trials of criminal cases both within the scope of the general court, the military, and online Islamic Criminal Jurisprudence.

Referring to the provisions of the criminal justice system in Indonesia, this can be categorized as a form of legal breakthrough (rules breaking) in a positive sense, considering that online criminal case trials have been implemented throughout Indonesia since March 2020 until now. However, online criminal case trials still leave problems, one of which is regarding the accuracy of the trial evidence. Evidence is the most important thing in seeking material truth according to the purpose of criminal law.

The nature of evidentiary in a criminal case trial is very urgent because it is a process to determine and state that a person's guilt can be sentenced (*veroordeeling* or conviction) based on the results of the trial that the person can be proven legally and convincingly to have committed a criminal act or can be released from charges (*vrijspraak* or acquittal) for not being proven to have committed a crime, or either released from all lawsuits (*onslaag van allerechthvervolging*) because what was charged was proven, but the act was not a criminal act.⁵

Evidentiary is a provision governing the means of evidence permitted by law, used by judges in evidentiary alleged wrongdoing in a trial, and not allowed to prove the defendant's wrongdoing without juridical grounds and based on justice.⁶

Problems related to the evidentiary process before the trial in recent times, while the trial of criminal cases is conducted by teleconference on the grounds of the COVID-19 pandemic so that the evidentiary process is different from the one as regulated in the Code of Criminal Procedure.

The trial by teleconference is carried out with the defendant being in the State Detention Center, while the Judge is in the trial room and the Public Prosecutor and Legal Advisor are in their respective offices or in the courtroom together with the Judge.⁷ This means that the process of extracting facts from witnesses, experts, defendants, including how to show evidence to witnesses and defendants, is not carried out directly.

For criminal cases with an easy evidentiary process, teleconference trials do not have much effect on the results of the search for material truth. However, for cases with a complicated process such as cases of criminal acts of corruption, especially cases originating from case-building (not being caught red-handed) such as proving the indictment of Article 2 or Article 3 of Law Number 31 of 1999 concerning Eradication of Criminal Acts of Corruption as amended by Law Number 20 of 2001 concerning Amendments to Law Number 31 of 1999 concerning Eradication of Criminal Acts of Corruption (hereinafter abbreviated as UU Tipikor or Anti-Corruption Law), teleconference trials are deemed to be very difficult in seeking material truth.

In corruption cases, it is generally not exempt from the evidentiary process through letters and correspondence documents as the evidence of the case. The accuracy of this process through letter evidence and other documents of correspondence evidence will be obtained if it is done in a face-to-face trial.

The trial of corruption cases by teleconference is very vulnerable to manipulation of the trial or case-playing that can obscure or change the actual facts, combined with internet connections issues. In addition, with a teleconference trial for judges, public prosecutors and legal advisors cannot see the direct response of the examined parties to determine the gesture in answering and giving reasons in answering the questions given, making it difficult to catch whether there has been a blurring of facts or not.⁸

One example of a corruption case that was conducted by teleconference at the Criminal Corruption Court at the Central Jakarta District Court from the beginning of the trial to the reading of the verdict, namely the Corruption Case Number 24/Pid.Sus-TPK/PN.Jkt.Pst on the name of the defendant Perdana Putra Mohede. The defendant was charged under Article 2 Paragraph (1) in conjunction with Article 18 of the Anti-Corruption Law in conjunction with Article 55 Paragraph (1) of the 1st Subsidiary Criminal Code Article 3 in conjunction with Article 18 of the Anti-Corruption Law in conjunction with Article 55 Paragraph (1) of the 1st Criminal Code, which requires proof of equipment letter evidence and direct evidence, but in practice, the evidentiary is carried out

⁴ <https://www.hukumonline.com/berita/baca/lt5f7e290eb1565/begini-prosedur-persidangan-perkara-pidana-secara-online/> acces date 22 February 2021

⁵ Lilik Mulyadi, *Pembalikan Beban Pembuktian Tindak Pidana Korupsi*, (Bandung: Alumni, 2007), page. 76

⁶ M. Yahya Harahap, *Pembahasan Permasalahan dan Penerapan KUHAP, Pemeriksaan Sidang Pengadilan, Banding, Kasasi dan Peninjauan Kembali*, (Jakarta: Grafika, 2000), page. 252

⁷ Article 2 Paragraph (2) Regulation of the Supreme Court of the Republic of Indonesia Number 4 of 2020 concerning Administration and Trial of Criminal Cases in Courts Electronically.

⁸ <https://fisip.ui.ac.id/peradilan-online-dan-isu-fair-trial/> accessed 10 May 2021

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by teleconference which in the trial the evidentiary is quite complicated because the case has 148 (one hundred and forty-eight) bundles of evidence in the form of documents.

This of course made it quite difficult for the Public Prosecutor to prove, in addition to the trial the defendant also admitted that he had difficulties in answering questions, both from the Judge and the Public Prosecutor, as well as when examining the equipment letter evidence and direct evidence.

B. ISSUE

1. How was the evidentiary process in the corruption criminal case trial by teleconference in the COVID-19 pandemic?
2. How should the evidentiary process in the corruption criminal case trial by teleconference be in the COVID-19 pandemic?

C. METHODOLOGY

The type of research carried out is normative legal research which is carried out by examining literary materials or mere secondary data, which includes primary, secondary and tertiary legal materials.⁹ Approaches to issues in legal research can be done through statute approach, conceptual approach, case approach and comparative approach. In this research, the author uses the statute approach, conceptual approach and case approach. The case approach is focused on the corruption case trial Number 24/Pid.Sus-TPK/2020/PN.Jkt.Pst on May 12, 2020, at the Criminal Corruption Court at the Central Jakarta District Court.

D. DISCUSSION

1. The evidentiary process in the corruption criminal case trial by teleconference in the COVID-19 pandemic
The trial of criminal cases by teleconference is regulated in Supreme Court Regulation No. 4 of 2020. In its consideration, this regulation is not only applied during the COVID-19 pandemic but more broadly, namely in "certain circumstances". Based on Article 1 Point 16 of Regulation No. 4 of 2020 states that what is meant by certain conditions are:
"... circumstances that do not allow the process of transferring cases, administration of cases or trials to be carried out under the procedures outlined in the Procedure Law due to distance, natural disasters, disease outbreaks, other circumstances determined by the government as emergencies or other circumstances according to The Council of Judges by stipulation shall conduct the conference electronically."

Supreme Court Regulation No. 4 of 2020 is a breakthrough that can exclude (exception) from the enforcement of the Criminal Procedure Code if it is judged to meet certain conditions. Regarding this, of course, there is a normative construction related to criminal trials by teleconference which is the focus of this research, namely the evidentiary of corruption criminal cases by teleconference.

In the corruption case trials by teleconference, there is an interesting mechanism in terms of evidentiary. Based on Article 14 of the Supreme Court Regulation No. 4 of 2020, the provisions regarding the examination of evidence are as follows: First, the evidence being examined remains in the Public Prosecutor's office. If the evidence is to be shown to witnesses or experts or defendants, the Public Prosecutor shows the evidence via video that is connected to the application for conducting the trial by teleconference. Second, if the evidence is in the form of a printed document, the Panel of Judges is required to match the scanned evidence document in the case file with the original document shown by the Public Prosecutor via video connected to the application for conducting the trial by teleconference. Third, if the Legal Advisor or the defendant wants to submit the evidence, it must be scanned first and sent to the court's email before being presented in the trial and the Judge is obliged to match the scan results with the original documents shown via video that is connected to the application for conducting the trial by teleconference.

In relation to the examination of witnesses and experts, based on Article 10 of Supreme Court Regulation No. 4 of 2020 provides the following provisions:

- 1) The party presenting the witness or expert is obligated to notify the clerk of the following matters: 1). The number of witnesses and or experts; 2.) Account where witnesses and/or experts are examined; 3). Photos, scans, or other printouts (identity cards and/or documents of witnesses and/or experts);
- 2) The substitute clerk summons a witness or expert into the electronic trial application through a witness or expert account that is easily notified in advance;
- 3) For witnesses whose identity must be kept confidential, the panel of judges are obligated to: 1). One moment to turn off the video features in the electronic trial application (witnesses only provide information in audio format); 2). Examine witnesses without the presence of the defendant Article 173 of the Criminal Procedure Code;

⁹ Soerjono Soekanto, *Op.Cit.*, page. 22

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- 4) A witness or expert is obliged to swear or promise under the criminal procedure law in the event that a witness or expert attends a trial from the courtroom in the jurisdiction of the witness or expert, the Head of the Court is obliged to provide electronic trial facilities appointing a substitute judge and clerk to supervise the examination without using trial attributes;
- 5) In the event that a witness or expert attends a trial from the Embassy of the Republic of Indonesia, the embassy is obliged to provide electronic trial facilities and appoint an embassy employee to supervise the examination.

However, in practice, the evidentiary process in the corruption case trials by teleconference is not easy, in this study the author took samples of corruption cases conducted by teleconference at the Criminal Corruption Court at the Central Jakarta District Court from the beginning of the trial to the reading of the verdict, namely corruption case Number 24/Pid.Sus-TPK/PN.Jkt.Pst on behalf of the defendant Perdana Putra Mohede. The defendant was charged under Article 2 Paragraph (1) in conjunction with Article 18 of the Anti-Corruption Law in conjunction with Article 55 Paragraph (1) of the 1st Subsidiary Criminal Code Article 3 in conjunction with Article 18 of the Anti-Corruption Law in conjunction with Article 55 Paragraph (1) of the 1st Criminal Code, which requires proof of equipment letter evidence and direct evidence, but in practice, the evidentiary is carried out by teleconference which in the trial the evidentiary is quite complicated because the case has 148 (one hundred and forty-eight) bundles of evidence in the form of documents.

In the case of a quo, the evidentiary process is done as per Supreme Court Regulation No. 4 of 2020, namely the Examination of Witnesses and/or Experts is conducted in the courtroom of the Court even though the trial is conducted electronically.¹⁰ Meanwhile, the defendant demanded that their testimony be heard from where they were detained accompanied/not accompanied by a legal advisor.¹¹ In the case of the examination of evidence, it is done through the Public Prosecutor submitting the evidence in court then the evidence submitted is clarified to the defendant.

Based on this description, at least it can provide an overview of the criminal case trial process by teleconference so that it meets the qualifications of a trial in a courtroom and is open to the public, which is really unimaginable in normal situations carried out in conventional ways as regulated in the Criminal Procedure Code.

The process of evidentiary by teleconference certainly affects its quality regarding the a quo case. The assessment of the evidence has the evidentiary power or not requires the judge to be observant one by one of the evidence presented in the trial. In addition to the maturity and professional factors of the judges, the process of assessing the strength of the evidence will also depend on the information obtained during the evidentiary process. The more comprehensive the information obtained by the judge related to the evidence, the more objective the judge will be in assessing whether the evidence is accepted or not and subsequently used to assess how strong the evidence is in proving the defendant being guilty or not.

This process is crucial when it comes to criminal trials by teleconference. Technical obstacles can interfere with judges in obtaining evidence-related information because they are not presented directly in front of the judge. Misinformation due to disturbances during the electronic trial is certainly feared to interfere with the judge's judgment regarding the strength of the evidence. If there is an error in its assessment, of course, this will be detrimental, especially for those who are in the process of submitting evidence.

However, in practice, the a quo case can run well even though there were some obstacles. The occurred obstacles are regarding the network and the process of submitting evidence. These obstacles can still be overcome because in principle the judge believes that based on the evidence presented at the trial the defendant has been legally and convincingly proven guilty of committing a criminal act of corruption together as regulated and threatened in Article 2 Paragraph (1) in conjunction with Article 18 of the Anti-Corruption Law in conjunction with Article 55 Paragraph (1) of the 1st Criminal Code.

2. The evidentiary process that should be done in the corruption criminal case trial by teleconference in the COVID-19 pandemic

The COVID-19 pandemic basically affects the process of handling criminal cases, especially corruption cases and to prevent the spread of COVID-19, it is necessary to conduct a teleconference trial. The legal provisions regulated in the Supreme Court Regulation Number 4 of 2020 in regulating the trial process by teleconference as part of the adjustment form in order to prevent the spread of Covid-19. The issuance of this regulation was the quickest answer to the legality problem of the procedure and the method of trial by teleconference.

However, not all cases' trials can be done by teleconference, one of the obstacles often experienced by law enforcement officers is cases where the evidence is complicated, such as cases of criminal acts of corruption whose cases are based on case building (not caught red-handed) such as Article 2 or Article 3 of the Anti-Corruption Law. Of course, if the trial is conducted by teleconference, it will be very difficult to find material truth and affect the quality of evidence.

¹⁰ Supreme Court Regulation Number 4 of 2020, Article 11 Paragraph (2)

¹¹ *Ibid.* Article 13 Paragraph (2)

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This difficulty occurs because there are still many weaknesses, including the internet network infrastructure that is not yet qualified and human resources who have not all mastered information technology. This is very influential in the implementation of criminal justice trials, both ordinary crimes and corruption, especially in terms of evidentiary related to the effectiveness of the examinations, both directly and indirectly.

Of course, inadequate facilities and infrastructure will not directly support the smooth running of the teleconference trial. The facilities and infrastructure in question are, of course, related to devices and internet networks. Furthermore, human resources who still do not understand information technology will certainly hinder the effectiveness of conducting teleconference trials. These things will certainly affect the level of accuracy, flexibility and accuracy of the judge's examination of the witnesses presented before the trial.

The evidentiary process of a criminal act of corruption at teleconference trials will indeed be a challenge for judges in finding and exploring the material truth of a criminal event that occurred. Article 183 of the Criminal Procedure Code states that a judge may not impose a sentence on a person unless with at least two valid pieces of evidence, with it they believe that a criminal act has actually occurred and that the defendant is guilty of committing it.

Concerning the judge's belief, in theory, their beliefs in the evidentiary system cannot stand alone but must be sourced from evidence or at least two valid pieces of evidence according to the Criminal Procedure Code, even though the judge is given subjective authority to judge whether a person is guilty or not. If the judge bases their decision solely on their belief, then that is where legal uncertainty and arbitrariness occur.¹²

In theory, the judge can decide someone is guilty based on their belief (Conviction In Time), but it must be a belief based on the evidentiary basis which accompanied by a conclusive summary based on certain evidentiary rules. So that the judge's decision is made with motivation. This evidentiary theory is also called free evidence because the judge is free to state the reasons for their belief based on evidence.

The Conviction In Time system adheres to the teaching that the defendant's guilt or innocence for the act accused is entirely dependent on the judge's assessment of their conviction. So whether the defendant is guilty or not depends entirely on the conviction of the judge.¹³ In legalistic legal analysis, which tends to be rigid or formal legalistic, online trials cannot be accepted as a medium for examining cases¹⁴ that require the presence of witnesses in the courtroom. However, in contrast to the provisions in Article 5 Paragraph (1) of Law Number 48 of 2009 concerning Judicial Powers, it is obligatory for judges to explore material truths, so that there is an opportunity for judges to override formal aspects.¹⁵

It can be understood that the judge's conviction does not have to be based on the existing evidence. Even if the evidence is sufficient, if the judge is not sure, the judge may not impose a sentence, on the contrary, even if the evidence is not available, if the judge is convinced, then the defendant can be declared guilty. As a result, in deciding cases, judges are very subjective and have the potential to make discriminatory decisions.

Based on independence and the principle of freedom, the judge's belief in deciding cases must be able to uphold truth and justice through various means, such as being able to interpret the actual law, daring to play a role in creating new laws or as lawmakers, daring to do *contra legem*, being able to play a casuistic and judicial role, and can provide access to justice.

In the evidentiary process, if the corruption cases trial by teleconference is still difficult to fulfill a sense of justice whether it is for the Public Prosecutor, the Defendant and Legal Advisor, for the sake of accommodating the trial evidentiary process, it is better if the judge according to their authority can provide an alternative to corruption cases, as referred to in Article 2 and Article 3 of the Anti-Corruption Law is being examined directly.

Furthermore, regarding the existence of the Supreme Court Regulation No. 4 of 2020 in a hierarchical structure of laws and regulations, it can be said that the position of this regulation is at the lower level, the same position as the internal legal products of other state institutions. This means that in order to provide a stronger legal basis for proceedings in electronic trials, it must be formulated into criminal procedural laws in the future, either in the form of revisions or replacements of existing criminal procedural laws.

E. CONCLUSION

Based on the discussion above, it can be concluded as follows:

1. Supreme Court Regulation No. 4 of 2020 in principle has accommodated the evidentiary process of the corruption cases trial and is legal according to law, but in practice, not all cases of corruption's evidentiary process can be done by teleconference.

¹² Subekti, *Hukum Pembuktian*, (Jakarta: Pradnya Paramita, 2015), page. 2

¹³ Andi Hamzah, *Hukum Acara Pidana*, *Ibid*, page. 241

¹⁴ Criminal Procedure Code, Article 160 Paragraph (1) letter a dan Article 167

¹⁵ Damayanti, Ruth Marina, *Legalitas Keterangan Saksi Melalui Teleconference Sebagai Alat Bukti Dalam Perkara Pidana*, (Jurnal Program Pascasarjana Ilmu Hukum Universitas Muhammadiyah Surakarta, Vol. 5, No. 1, 2014), page. 6

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2. The evidentiary process of the corruption cases trial by teleconference in the COVID-19 pandemic situation that should be carried out is optional so that in practice it does not need to be carried out by teleconference, this goes back to the weight of the case being handled.

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