
The Application of Restorative Justice as an Effort to Resolve the Crime of Theft in Sukabumi Resort Area

Gilang Rochmat Kusumah*¹, Dwidja Priyatno², Rusman³, & Trini handayani⁴

^{1,3,4} Pascasarjana Program Studi Magister Ilmu Hukum, Universitas Suryakencana

² Sekolah Tinggi Hukum Bandung

*Email Corresponding: gilangrochmatkusumah.90@gmail.com

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Abstract

This research discusses the application of restorative justice in handling theft cases in the Sukabumi Police District. Restorative justice emphasises the restoration of relationships between perpetrators, victims, and society, in contrast to traditional criminal law approaches that focus more on sanctions. Using a normative juridical method, this research evaluates various obstacles in the implementation of restorative justice, such as a lack of understanding from law enforcement officials and resistance to system change. In addition, there are difficulties in achieving peace between offenders and victims, as well as the absence of legal regulations at the statutory level that fully support this concept. The research findings revealed that the implementation of restorative justice in Sukabumi jurisdiction is still structurally and procedurally constrained. Therefore, further efforts are needed to increase the understanding and awareness of the authorities and the community of the benefits of this approach to achieve fairer and humanity-focused settlements. This research is expected to contribute to the development of fairer and more effective legal policies in Indonesia.

INTRODUCTION

According to Artidjo Alkostar, certain criminal cases - such as the theft of clotheslines by hungry scavengers have undermined the sense of justice and disturbed the public's common sense. This phenomenon demands a critical evaluation of the criminal justice system in Indonesia. In addition, the mechanism of administration of justice also needs to be reviewed to ensure equal access to justice for all levels of society (Alkostar, 2011). Criminal law should be the last step (*Ultimum Remedium*), by considering whether other laws have provided adequate protection and whether criminal sanctions are really needed in the situation (Krismen, 2014).

The court is no longer considered to be an effective means of resolution for petty theft cases. The complicated and time-consuming judicial process is seen to cause greater losses, both economically and psychologically, not only for the perpetrator but also for the community (Purba, 2024). In fact, according to Jeremy Bentham, the main purpose of law is to maximise happiness and reduce suffering (Wulandari, 2018). However, in cases of petty theft driven by economic factors, prison sentences or fines imposed by the court can actually worsen the situation of the offender and the community (Wulandari, 2018).

As an alternative, the concept of restorative justice has been introduced in Indonesia. This concept offers a different approach in dealing with criminal offences, focusing on the recovery of victims and offenders, as well as the repair of social relationships damaged by criminal offences (Yunus & Dahri, 2021). In contrast to conventional criminal law which

emphasises punishment, restorative justice offers a more humane and problem-solving oriented solution (Najoan et al., 2021).

Regulation of the Attorney General of the Republic of Indonesia No. 15 of 2020 on Termination of Prosecution Based on Restorative Justice lists certain conditions for terminating prosecution based on restorative justice. One of the requirements for the perpetrator is that the suspect is a first-time offender. As for the criminal offence, there are two criteria. First, the criminal offence is only punishable by a fine or imprisonment of not more than five years. Second, the value of the evidence or loss resulting from the criminal offence must not exceed Rp. 2,500,000 (two million five hundred thousand rupiah). However, in practice, the application of restorative justice has experienced difficulties, such as what happened in Kupang City in a theft case. Although the case met the requirements of the Attorney General's Regulation No. 15 of 2020, the suspect had never done anything wrong before, the penalty was under five years, and the loss had been restored, due to a rigid interpretation of the IDR 2,500,000 loss limit, the concept of restorative justice was not successfully applied (Purba, 2023).

In accordance with the essence of the Attorney General Regulation No. 15 of 2020, there should be an amicable agreement between the victim and the defendant. Therefore, prosecutors should apply restorative justice to emphasise more amicable settlements, particularly in minor and humanitarian cases. This is in line with the instruction of the Attorney General of the Republic of Indonesia which requires prosecutors to prioritise conscience in every case handling (Purba, 2023).

This research focuses on understanding and applying the basic concept of restorative justice in handling theft offences from the perspective of positive law in Indonesia. Although the concept is intended to offer a fairer and more humane solution compared to the traditional criminal justice system, its implementation has faced considerable challenges, particularly in the jurisdiction of Sukabumi Resort Police. These include a lack of in-depth understanding of the principles of restorative justice among law enforcement, resistance to change in the existing system, as well as difficulties in reaching agreement between the parties involved. In addition, the research also explores the various efforts that can be made to ensure that the application of restorative justice in theft offence cases in the region can succeed effectively, while considering the interests of all parties involved.

The purpose of this journal is to analyse restorative justice as an alternative solution for petty theft cases in Indonesia, particularly in the jurisdiction of Sukabumi Resort Police. The research also aims to identify the obstacles faced in the application of restorative justice, as well as finding solutions so that the application of this concept can provide more comprehensive justice for all parties involved. Through this analysis, it is hoped that it can contribute to the development of a fairer and more effective legal policy in Indonesia.

RESEARCH METHODOLOGY

This research uses a normative juridical approach with descriptive-analytical. This approach is conducted by examining legal principles, doctrines, and relevant laws and regulations, particularly those relating to the application of restorative justice in the criminal offence of theft in Indonesia. In accordance with Creswell's view, this approach is included in

qualitative research, which aims to understand the meaning and interpretation of a socially constructed legal issue (John W. Creswell & J. David Creswell, 2018). Based on Creswell's classification, this research reflects a *constructivist worldview*, where researchers try to capture an understanding of the practice of *living law* in society, as well as how the concept of restorative justice is understood and applied in law enforcement practices at the police level (John W. Creswell & J. David Creswell, 2018). The data used in this research are categorised as: Primary legal materials, namely laws and regulations related to the criminal justice system and restorative justice; Secondary legal materials, namely doctrines, journals, books, and previous research results, as well as; Tertiary legal materials, such as legal expert opinions and public views obtained through literature studies. Data collection methods were conducted through *library research*, including reviewing legal sources at Suryakencana University library, regional libraries, and online databases. Data analysis techniques were carried out qualitatively, by interpreting legal materials in a systematic, logical and coherent manner to gain an in-depth understanding of the application of restorative justice. This process is in accordance with Creswell's guidance on qualitative data analysis, namely building themes or patterns from the data collected inductively, then compiled in the form of in-depth narratives.

RESULTS AND DISCUSSION

1. The Basic Concept of Restorative Justice in the Crime of Theft from the Perspective of Indonesian Positive Law

The concept of Restorative Justice at its core is very simple, namely assessing justice is no longer based on the retribution of the victim against the perpetrator (whether through physical, psychological, or punitive means), but rather on restoring the wounds caused by the act by providing support to the victim and encouraging the perpetrator to take responsibility, with the help of the family and community if needed (Daly, 2000). Law enforcement is not a separate activity, but has a close reciprocal relationship with society. The social structure of society is influential, both in providing the means that allow law enforcement to be carried out, as well as in creating obstacles that prevent its optimal implementation (Huda, 2011).

Since the enactment of Law Number 2 Year 2012 on the Adjustment of the Limitation of Minor Crimes and the Number of Fines in the Criminal Code, there is a general explanation which states that it is very unfair if an offender is sentenced to 5 years imprisonment under Article 362 of the Criminal Code just for stealing goods with a small value. Thus, the punishment imposed is considered not proportional to the value of the stolen goods. Theft cases with a value below the adjustment limit should be categorised as minor criminal offences (Retnowati, 2022).

According to the Decree of the Director General of Public Courts Number: 1691/DJU/SK/PS.00/12/2, theft with the value of stolen goods below Rp. 2,500,000.00 is categorised as a minor criminal offence. This regulation explains that crimes in the form of petty theft can be resolved through a restorative justice approach. Laweyan Police follows the guidelines of Police Circular Letter Number: SE/8/VII/2018 in implementing restorative justice, with the following implementation mechanism (Retnowati, 2022): 1) After receiving a request for peace signed by the perpetrator and victim on stamped paper, research is carried out regarding the formal requirements of restorative justice; 2) The request for peace is

submitted to the superior for approval after the formal requirements are fulfilled; 3) Once approved by the superior, a time is set for the signing of the peace agreement; 4) A conference is held which results in an agreement signed by all parties involved; 5) Preparation of a memorandum of request for termination of the case; 6) Implementing restorative justice by involving the victim, perpetrator, families of both parties, community leaders appointed by the investigator, and the police handling the case; 7) Preparing administrative documents related to the implementation and reports on the results of the implementation; and 8) Issuing a prosecution termination order on the basis of restorative justice.

Restorative justice is applied as an alternative to improve the criminal justice system, especially in resolving minor criminal cases before the law. In addition to the legal process that requires the imposition of prison sentences or fines, the settlement of criminal cases can be carried out through restorative justice which aims to achieve peace between the two parties (Taryus et al., 2023). Restorative justice encompasses philosophies, processes, ideas, theories and interventions that emphasise the restoration of harm resulting from criminal acts (Prayatno, 2012). This concept is very different from the standard mechanisms of dealing with crimes that are considered offences against the state. Restorative justice is rooted in the basic philosophy of the fourth principle of Pancasila, where deliberation is prioritised in decision-making. In addition, case resolution is done through mediation between the victim and the offender, so as to fulfil the true needs of the victim, the offender, and the community. The restorative justice approach emerged as an alternative criminal case resolution mechanism that is expected to cover the shortcomings in the criminal justice system by involving direct participation from victims and perpetrators (Maulidar, 2021).

The concept of restorative justice is considered in line with the values of Pancasila, which is the source of all laws in Indonesia and is a legal system rooted in various legal systems applied in Indonesian society, including customary law and Islamic law, which prioritise deliberation in resolving conflicts among community members (Chandra, 2014).

The spirit of restorative justice is reflected in various laws, such as Law No. 15/1995 on Corrections, Law No. 11/2012 on Juvenile Justice System, Law No. 23/2004 on the Elimination of Domestic Violence, and the 2015 Draft Criminal Code. Various regulations related to restorative justice in minor criminal cases include the Criminal Code Article 310, Criminal Procedure Code Article 205, PERMA RI Number 2 of 2012 concerning Adjustment of the Limitation of Minor Crimes and the Amount of Fines in the Criminal Code, as well as the Memorandum of Understanding between the Chief Justice of the Supreme Court of the Republic of Indonesia, the Minister of Law and Human Rights of the Republic of Indonesia, the Attorney General of the Republic of Indonesia, and the Chief of Police of the Republic of Indonesia, which includes document numbers such as 131KMASKBX/2012, M.HH-07.HM.03..02/2012, KEP-06/E/EJP/10/2012, and B/39/X/2012 issued on 17 October 2012 on the Implementation of Adjustment of Minor Crime Limits and Fines, Rapid Examination Procedures, and the Application of Restorative Justice. There is also a letter from the Director General of Public Courts Number 301/DJUHK01/3/2015 on the settlement of minor crimes.

2. Obstacles in the Implementation of Restorative Justice in the Crime of Theft in Sukabumi Resort Police

The results of the evaluation of the application of restorative justice in Sukabumi District Police showed that there were obstacles in the settlement of theft cases, namely:

a. No peace agreement between victim and perpetrator.

One of the formal requirements in the application of restorative justice as stipulated in Police Regulation No. 8 of 2021 and Article 12 of Police Chief Regulation No. 6 of 2019 concerning Criminal Investigation is the existence of a letter of request for peace from both parties (perpetrator and victim), as well as a letter of statement of peace and settlement of disputes between the parties to the dispute (the complainant, and/or his family, the reported party and/or his family, and representatives of community leaders). In practice, traffic accidents often occur where the parties involved do not agree on peace or do not make a peace agreement (Yulia & Prakarsa, 2021). This disagreement results in the settlement of theft cases through restorative justice cannot be achieved. To overcome these obstacles, investigators do not need to intervene, but rather involve the village government, including village officials from each party involved, to mediate. This mediation is expected to reduce the accumulation of cases, accelerate case settlement in a cheaper and simpler way, and provide the widest possible access for the parties to obtain justice (Silvia et al., 2024).

b. Third party intervention

The application of restorative justice aims to provide justice and legal certainty for the parties to the dispute. However, sometimes there are third parties who provoke victims to continue the process through judicial channels. The solution to overcome this is to approach the conflicting parties (perpetrators and victims) so that they are not influenced by uninterested third parties. In addition, briefing both parties (perpetrators and victims), as well as community leaders involved, on the purpose of resolving cases based on restorative justice that prioritises the principle of justice also needs to be done (Pramono & Astuti, 2023).

c. The Absence of Law-Level Rules to Accommodate the Concept of Restorative Justice

In the 2023 Criminal Code (the new Criminal Code), the principle of restorative justice has been explicitly accommodated as an alternative approach in resolving criminal cases, although until now the Criminal Code has not been effectively enacted. Article 53 of the new Criminal Code states that judges are obliged to uphold justice in every criminal case, and if there is a conflict between law and justice, then justice must be prioritised. This provision reflects the essence of restorative justice principles which focus on healing and peaceful conflict resolution. As a concrete example of the application of this approach, there was a case of light maltreatment in Sukabumi District, where the local District Attorney's Office decided to stop the prosecution process against suspect FJ who was suspected of violating Article 351 paragraph (1) of the Criminal Code after lightly beating victim B. The mediation process facilitated by the Prosecutor's Office involved community leaders, sub-district heads, village heads, and police officers, until an amicable agreement was reached voluntarily by both parties. Based on the agreement, and considering that the suspect had never committed a criminal offence, the sentence was under five years, and there was no pressure in the peace process, the Prosecutor's Office issued a Decree of Termination of Prosecution (SKPP), referring to Regulation of the Attorney General Number 15 of 2020. This example shows how restorative

justice can provide an alternative to case resolution that prioritises the restoration of social relations and substantive justice over punishment alone (Editorial, 2023). A similar application also occurred in the case of Jona Arizona, former Deputy Chairperson of the Sukabumi City DPRD for the 2019-2024 period, who was charged with violating Articles 372 and 378 of the Criminal Code for alleged fraud and embezzlement of Rp1.2 billion belonging to Rudolf. The funds were given to finance a sock project and fuel procurement, but were not returned as promised, so the victim took legal action. During the trial on 28 April 2025, Jona handed over Rp230 million in restitution to the victim, which became an important consideration in the restorative justice approach. The Head of the Sukabumi City District Attorney's Office, Setiyowati, emphasised that this case was resolved by prioritising the principle of restorative justice, which was then confirmed in the decision of the panel of judges. Chief Judge Himelda Sidabalok along with two Member Judges, Christoffel Harianja and Miduk Sinaga, imposed a sentence of one year in prison minus the period of detention, but within the framework of a peaceful approach between the perpetrator and the victim and the recovery of losses incurred. Thus, this case confirms that the application of restorative justice in economic cases can be a more humane settlement mechanism, as long as the perpetrator shows direct responsibility for the victim, and still prioritises justice and legal effectiveness in society (Saepulloh & Assifa, 2025).

The foundation for the application of restorative justice is strengthened in Law Number 1 Year 2023 on the Criminal Code, specifically in Article 54 which more specifically regulates the factors of consideration in punishment. This article covers important aspects such as the motive and purpose of the perpetrator, the elements of guilt, the manner in which the criminal offence was committed, and the psychological background of the perpetrator. The offender's remorse, life history, social conditions, and forgiveness from the victim are also considerations that must be considered by the judge. By considering these aspects, punishment is expected not only as a form of punishment, but also a process of rehabilitation of the perpetrator and recovery of the victim. This concept is in line with the restorative justice approach that emphasises human values and substantive justice in the settlement of criminal cases.

As for Article 54 paragraph (1) letter (j), it is explicitly stated that forgiveness from the victim is one of the factors that must be considered in determining whether the punishment will continue or not. This provision confirms that the spirit of restorative justice has been normatively accommodated in positive law at the statutory level. The existence of Articles 53 and 54 of the Criminal Code 2023 provides a strong legal basis for judges to pursue a more humane resolution of cases. However, the current reality shows that the implementation of restorative justice principles still largely relies on derivative regulations such as Perkap and Perpol, not laws. The reliance on rules that are hierarchically lower than KUHAP creates potential normative conflicts, because KUHAP is still the applicable criminal procedural law as the main reference in the trial process.

The imbalance between Perpol No. 8 of 2021 and KUHAP raises issues in the context of the principle of *lex superior derogat legi inferiori*, namely that higher regulations override lower ones. Therefore, it is important to place rules related to restorative justice in the form of legislation so that they have equal legal legitimacy with KUHAP. To date, KUHAP remains recognised as the formal criminal procedure law, while Perpol only has the status of a technical

police regulation. In this context, if there is a difference in procedure between KUHAP and Perpol, then normatively KUHAP will be prioritised. This becomes a serious problem when two conflicting procedural systems are applied simultaneously in criminal law practice (Nugroho, 2023).

Furthermore, the procedural incompatibility between KUHAP and Perpol is evident from the different approaches in handling criminal cases. KUHAP regulates the penal process with formal stages such as investigation, prosecution, and trial that lead to court decisions. In contrast, the Perpol introduces non-penal mechanisms in the form of mediation and peace-based settlements that emphasise the restoration of relationships between perpetrators and victims. This fundamental difference creates a dilemma for law enforcement officials, especially in cases such as theft, where they must choose between carrying out the legal process procedurally or resolving the case peacefully by promoting the principles of restorative justice. The tension between these two approaches reflects a structural problem in the Indonesian criminal law system, which until now has not had harmony between substantive rules and procedural rules in supporting the application of restorative justice as a whole (Utomo, 2023).

Based on the explanation above, it can be seen that the main obstacle in the application of restorative justice does not only come from the substance of the law, but also from the aspect of procedural formalities. The absence of a peace agreement between the victim and the perpetrator, the intervention of third parties, and the absence of a legal basis at the level of a law that specifically regulates restorative justice are some of the main obstacles. The absence of rules that have the same legal force as the Criminal Procedure Code, such as Police Regulation No. 8 of 2021, makes the application of restorative justice prone to legal disputes. Therefore, harmonisation between penal and non-penal approaches in the criminal procedure law system is an urgent need so that the principles of restorative justice can be implemented effectively, fairly and with legal certainty in the practice of criminal justice in Indonesia.

3. Efforts to Achieve Restorative Justice in the Crime of Theft in Sukabumi Resort Police

Restorative justice should be more appropriate than retributive justice in countries where the judicial system is not functioning optimally. Restorative justice seeks to promote social welfare and is a central element of the principle. The main focus in restorative justice is peace and reconciliation, not retributive punishment aimed at providing the greatest possible deterrent to the offender, such as the death penalty or life imprisonment. Uncertainty and unfairness in the judicial process can fuelled sentiment, resentment, anger and hatred between victims and perpetrators. As a result, even brutal acts may occur between victims and perpetrators (Mirza & Zen, 2022).

The offence of theft is regulated in Articles 362 to 367 of the Criminal Code, which stipulates that a person who commits the offence of theft may be subject to criminal sanctions. However, law enforcement against the offence is still considered ineffective. Enforcement of criminal law is not enough just to regulate an act in the law, but also requires law enforcement officials as implementers of the provisions of the law as well as institutions that are authorised to handle crimes, such as the Police, Prosecutor's Office, and Court. In the case of theft, the loss incurred is usually material, so the victim often demands the perpetrator to return the loss

or request that the perpetrator be subject to criminal sanctions for his actions. As a result, investigators in solving theft cases are often faced with demands from victims or perpetrators so that the problem can be resolved in a family manner (Akbar, 2023).

The criminal justice system in Indonesia, which still prioritises imprisonment or confinement, is no longer the only way to resolve a case. Based on the type and condition of the case, the parties prefer to focus on victim recovery and offender accountability. In addition, this approach is also supported by the sociological conditions of Indonesian society which generally adheres to the values of mutual forgiveness and prioritises the responsibility of the perpetrator in the form of compensation to restore the situation. Therefore, in the process of resolving criminal cases, it is necessary to accommodate the concept of restorative justice from the stage of reporting to the police. The goal is to achieve justice and restore conditions damaged by criminal offences, by prioritising the principle of peace that involves direct participation from perpetrators, victims, law enforcement officials, and the community (Utomo, 2023).

The implementation of police investigators' discretion is contextual, influenced by various factors such as case characteristics, socio-cultural conditions, and investigators' personal experience. This phenomenon is similar to the resolution of criminal cases through customary mechanisms, where strong customary practices often become a reference in handling cases such as rape, theft, and persecution.

The steps taken by Police Investigators are to supervise, coordinate and monitor the process of resolving a criminal case with the aim of achieving justice and expediency, without ignoring aspects of legal certainty. This is done to avoid sanctions that can exceed the limits of human rights and damage human values. Polres Sukabumi is of the opinion that a theft report, which is an ordinary offence, can be revoked through an agreement between the victim and the perpetrator, as well as using the discretionary authority of the Police by the Investigator. At the time of this case, the Police already had a strong legal basis, namely the Regulation of the National Police of the Republic of Indonesia Number 08 of 2021 concerning Handling Crimes Based on Restorative Justice, which became a reference in applying restorative justice. All requirements in the regulation were complied with, and in the settlement of this case, the Investigator acted as a mediator between the perpetrator and the victim without coercion. The settlement of this case was purely based on forgiveness from the victim to the perpetrator, with the perpetrator willing to compensate for the harm caused. Finally, this case was resolved using a restorative justice approach.

CONCLUSIONS AND SUGGESTIONS

The resolution of theft cases at Sukabumi Police Station can be done by integrating a restorative justice model as a priority in dispute resolution within the police. This is an effort to achieve peace between the disputing parties, taking into account the type of theft offence that meets the material and formal requirements according to Perkap No. 6 of 2019 and Perpol No. 8 of 2021. In addition, customary institutions and social institutions known in the Sukabumi community are also optimised. If the application of restorative justice is unsuccessful, then the case will proceed to the realm of general justice.

However, if the peace effort is successful and is outlined in a peace deed, the final process is the termination of the investigation by law. The settlement of petty theft offences through a restorative justice approach is in line with the doctrine of Islamic law, which prioritises settlement through peace and wisdom. In this process, peace is made between the perpetrator, victim, perpetrator's family, and community leaders, with or without compensation. After reaching an agreement, all parties will sign a peace document.

This suggests that restorative justice is more appropriate than retributive justice in countries where the justice system is not functioning optimally. The focus of restorative justice is on peace and reconciliation, not on revenge, which aims to promote social welfare and support healing between victims and offenders. The application of restorative justice in criminal cases, such as theft, involves the participation of all parties, including law enforcement, to achieve justice and restoration while still considering the local customary and cultural context.

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REFERENCES

- Akbar, A. A. (2023). *Implementasi Penindakan Pidana Dalam Perkara Tindak Pidana Pencurian Dengan Pendekatan Restorative Justice*. Universitas Muslim Indonesia Makassar.
- Alkostar, A. (2011). *Keadilan Restoratif*. Kompas.Com.
- Chandra, S. (2014). Politik Hukum Pengadopsian Restorative Justice Dalam Pembaharuan Hukum Pidana. *FIAT JUSTISIA: Jurnal Ilmu Hukum*, 8(2), 255–277. <https://doi.org/10.25041/fiatjustisia.v8no2.301>
- Creswell, J. W., & Creswell, J. D. (2018). A Mixed-Method Approach. In *Research Design Qualitative, Quantitative, and Mixed Methods Approaches*. SAGE Publications. <https://doi.org/10.4324/9780429469237-3>
- Daly, K. (2000). Restorative Justice in Diverse and Unequal Societies. *Law in Context*, 17(1), 167–190.
- Huda, C. (2011). "Dari'Tiada Pidana Tanpa Kesalahan'', Menuju'Kepada Tiada Pertanggungjawaban Pidana Tanpa Kesalahan'' : Tinjauan Kritis Terhadap Teori Pemisahan Tindak Pidana dan Pertanggungjawaban Pidana" (Cetakan 4). Prenada Media.
- Krismen, Y. (2014). Pertanggungjawaban Pidana Korporasi Dalam Kejahatan Ekonomi. *Jurnal Ilmu Hukum*, 4(1), 133–160. <https://doi.org/http://dx.doi.org/10.30652/jih.v4i1.2089>
- Maulidar, M. (2021). Korelasi Filosofis Antara Restorative Justice Dan Diyat Dalam Sistem Hukum Pidana Islam. *At-Tasyri': Jurnal Ilmiah Prodi Muamalah*, 13(2), 143–155. <https://doi.org/https://doi.org/10.47498/tasyri.v13i2.856>
- Mirza, I. M. M., & Zen, A. P. (2022). Strategi Internalisasi Asas Restorative Justice Dalam Sistem Peradilan Indonesia. *Pancasila: Jurnal Keindonesiaan*, 2(2), 149–162. <https://doi.org/https://doi.org/10.52738/pjk.v2i2.45>

- Najoan, W. A. C., Sumilat, V. V., & Roeroe, S. D. L. (2021). Penerapan Restorative Justice Dalam Penyelesaian Perkara Pencurian Ringan Di Indonesia. *Lex Crimen*, 10(5), 89–98.
- Nugroho, F. S. (2023). *Rekonstruksi Regulasi Penegakan Hukum Tindak Pidana Pencurian Dengan Pemberatan Di Indonesia Melalui Pendekatan Restorative Justice*. Universitas Islam Sultan Agung Semarang.
- Pramono, F. H., & Astuti, L. (2023). Penerapan Keadilan Restoratif Pada Tindak Pidana Ringan di Kejaksaan Negeri Yogyakarta. *Indonesian Journal of Criminal Law and Criminology (IJCLC)*, 4(2), 84–98. <https://doi.org/https://doi.org/10.18196/ijclc.v4i2.19806>
- Prayitno, K. P. (2012). Restorative Justice Untuk Peradilan Di Indonesia (Perspektif Yuridis Filosofis dalam Penegakan Hukum In Concreto). *Jurnal Dinamika Hukum*, 12(3), 407–420. <https://doi.org/http://dx.doi.org/10.20884/1.jdh.2012.12.3.116>
- Purba, A. R. (2023). Analisis Yuridis Penerapan Restoratif Justice pada Tahap Penuntutan Terhadap Tindak Pidana Pencurian Di Bawah Nilai Dua Juta Rupiah Dalam Sistem Hukum Di Indonesia. *Jurnal Hukum Kaidah: Media Komunikasi Dan Informasi Hukum Dan Masyarakat*, 23(1), 103–120. <https://doi.org/https://doi.org/10.30743/jhk.v23i1.8461>
- Redaksi. (2023). *Kasus Penganiayaan di Cibadak Sukabumi, Berujung Restorative Justice*. Radarsukabumi.Com.
- Retnowati, L. (2022). *Penerapan Restorative Justice Sebagai Upaya Penyelesaian Hukum Terhadap Tindak Pidana Pencurian (Studi Kasus di Wilayah Kepolisian Sektor Laweyan)*. Universitas Muhammadiyah Surakarta.
- Saepulloh, R. A., & Assifa, F. (2025). *Eks Pimpinan DPRD Sukabumi Terpidana Penipuan Rp 1,2 M Dapat "Restorative Justice."* Kompas.Comcom.
- Silvia, Sukmaren, & Munandar, S. (2024). Pelaksanaan Restorative Justice Terhadap Tindak Pidana Ringan Pencurian Oleh Bhabinkamtibmas Polsek Pariangan Resor Tanah Datar. *YUSTISI: Jurnal Hukum Dan Hukum Islam*, 11(2), 409–419. <https://doi.org/https://doi.org/10.32832/yustisi.v11i2.16892>
- Taryus, S., Yusrizal, & Nur, M. (2023). Analisis Penyelesaian Tindak Pidana Pencurian Gabah Kopi Melalui Restorative Justice Di Wilayah Hukum Polsek Bandar Kabupaten Bener Meriah. *Suloh: Jurnal Fakultas Hukum Universitas Malikussaleh*, 11(1), 170–184. <https://doi.org/10.29103/sjp.v11i1.9977>
- Utomo, S. A. P. (2023). *Penerapan Restorative Justice Sebagai Alternatif Penyelesaian Dalam Tindak Pidana Pencurian*. Universitas Darul Ulum Islamic Centre Sudirman Guppi.
- Wulandari, S. R. (2018). Penerapan Alternatif Penyelesaian Sengketa Terhadap Tindak Pidana Pencurian Bernilai Ringan. *Krtha Bhayangkara*, 12(1), 63–77. <https://doi.org/https://doi.org/10.31599/krtha.v12i1.30>
- Yulia, R., & Prakarsa, A. (2021). Telaah Yuridis terhadap Pengaturan Restorative Justice di Kepolisian. *Wajah Hukum*, 5(2), 562–572. <https://doi.org/10.33087/wjh.v5i2.716>
- Yunus, A. S., & Dahri, I. (2021). *Restorative Justice Di Indonesia* (Guepedia/Ag (ed.)). Guepedia.

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