



CRIMINAL SANCTIONS AGAINST CHILD OFFENDERS REPEAT OFFENSE

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ABSTRACT

This research focuses on the ambiguity of legal norms related to recidivism in the juvenile justice system in Indonesia, particularly within the framework of Law Number 11 of 2012 concerning the Juvenile Criminal Justice System (UU SPPA). This research uses a normative juridical approach with conceptual analysis methods and a statute approach, supported by empirical data from five case studies of recidivist juvenile cases tried at the District Court "X" during the period 2022–2024. The research findings indicate that the absence of explicit norms regarding juvenile recidivism leads to disparities in sentencing, weak legal certainty, and potential violations of the principle of child protection. This research recommends the need to reformulate the SPPA Law to include substantive provisions regarding recidivism, as well as harmonization with the National Draft Criminal Code which has systematically included the definition of recidivism. The implications of this research emphasize the importance of a more responsive and consistent legal reform in ensuring justice for children in conflict with the law.

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1. INTRODUCTION

Protection of children as part of human rights is an issue that continues to be a focal point in national and international legal discourse (D. W. D. Putri, 2022). In Indonesia, the principle of non-discrimination and the child's right to protection are affirmed in Article 28B paragraph (2) of the 1945 Constitution of the Republic of Indonesia (Manulang et al., 2024). The provision states that every child has the right to survival, growth, and development, as well as the right to protection from violence and discrimination. In this context, the state is obliged to ensure the protection of children not only as victims but also when children become perpetrators of criminal acts. The importance of this issue is emphasized by the fact that children as perpetrators of criminal acts often receive negative stigma, unequal treatment in legal processes, and ultimately the neglect of their rights as protected legal subjects.

Field phenomena indicate that the juvenile criminal justice system in Indonesia has not yet fully realized the principle of comprehensive and fair legal protection. For example, several cases of violence or juvenile delinquency that occurred in the past two years, such as the bullying case in South Kalimantan and the abuse case in Tulang Bawang Barat, indicate that case resolution is still predominantly carried out through non-litigation approaches like diversion, even without formally involving law enforcement officers (Yolanda Marito, 2024). Such resolutions, although reflecting the deliberative values of local culture, indicate gaps in the national legal system, particularly in the handling of children as recidivists or repeat offenders. In fact, the recurrence of criminal acts by children is a reality that occurs frequently and has not yet been explicitly regulated in legislation, thus opening the door to multiple interpretations and inconsistencies in the application of the law.

Various previous studies have attempted to address the complexity of this issue. For example, Wangga (2024) highlights that diversion as a form of resolution outside the criminal justice system does not yet have clear parameters in dealing with cases of juvenile recidivism. Additionally, Permata et al. (2025) found that law enforcement officers in the regions tend to choose familial pathways to avoid lengthy and convoluted legal processes, but this results in the neglect of the principle of legal accountability. Meanwhile, Cohn et al. (2021) emphasize that the provisions in the SPPA Law still leave a legal vacuum (*leemten in het recht*) regarding criminal sanctions for juvenile recidivists. These three studies demonstrate the urgent need to conduct a legal review of the normative gap regarding the imposition of criminal sanctions on recidivist children, as well as the urgency of refining the legal framework to ensure proportional justice with a child perspective.

Until now, there has not been much research specifically discussing the impact of legal vacuums on the imposition of criminal sanctions for juvenile recidivists within the Indonesian legal system. Especially, there has not yet been a study that highlights the issue of legal discovery (*rechtsvinding*) as a strategy in addressing the normative gap. This is where the scientific gap (research gap) that has not yet been filled lies. This gap is important because without a clear legal basis, law enforcement officers will continue to experience confusion between applying criminal law conventionally or adjusting it to the principles of child protection.

This research presents novelty by elaborating on the *rechtsvinding* model as an alternative approach to address the legal vacuum related to the sentencing of juvenile repeat offenders. Not only does this study offer criticism of the weaknesses in the existing normative system, but it also presents conceptual solutions based on legal principles such as *ius curia novit* and the principle of restorative justice, which are more aligned with the protection of children's rights.

In addition, this research will also analyze the extent to which judges and law enforcement officers have the space to interpret the law progressively in cases of juvenile recidivists, which remains a topic of debate to this day. Thus, the main objective of this research is to examine the legal void in the sentencing of juvenile recidivists and to formulate *rechtsvinding* steps that can serve as a legal foundation in juvenile criminal justice practice. It is hoped that the results of this research can make a tangible contribution to the formation of legal policies that are more responsive to social developments and ensure substantive justice for children in conflict with the law.

2. RESEARCH METHODS

This research uses the normative juridical analysis method, which focuses on the study of law as a set of norms that regulate and bind within the national legal system (Octavia & Tunnisa, 2025). In this framework, the research is not intended to examine the empirical reality of juvenile offenders sociologically, but rather to focus on a systematic analysis of the applicable legal norms, particularly concerning the phrase of recidivism norms in the context of juvenile criminal law. To support this objective, two main approaches are used, namely the conceptual approach and the statute approach. The conceptual approach is employed to examine and dissect the fundamental ideas and theoretical constructions regarding the concept of recidivism in criminal law, both from historical, doctrinal, and modern legal thought development perspectives. This approach is important in understanding the position of the concept of recidivism within the framework of juvenile criminal justice, which always strives to prioritize the principles of restorative justice and the best interest of the child.

Meanwhile, a legislative approach is used to trace and examine normative provisions that explicitly regulate the repetition of criminal acts. The primary legal materials in this research include Law Number 11 of 2012 on the Juvenile Criminal Justice System (UU SPPA), the currently applicable Criminal Code (KUHP), and the Draft Criminal Code (RKUHP) as a form of national criminal law reform relevant for future reference. The RKUHP explicitly regulates recidivism in Articles 64 to 72, which is a crucial point in the reform of criminal law as it also encompasses the possibility of applying the concept of recidivism to juvenile offenders. Therefore, this research considers it important to critically examine the substance, in order to see whether the concept of recidivism as formulated in the Draft Criminal Code (RKUHP) aligns with the principles of child protection in a modern and humanistic criminal justice system.

In addition, secondary legal materials such as scientific journals, criminal law literature, and comparative studies with the legal systems of other countries also play an important role in strengthening this analysis. Relevant legal journals are used to explore juridical interpretations and alternative normative approaches in addressing juvenile recidivism. By using this analytical framework, this research aims to produce a comprehensive legal construction with a child protection perspective, while also providing policy recommendations oriented towards corrective justice, rather than merely retributive justice.

3. RESULT AND ANALYSIS

Ambiguity of Phrases (Repetition) in the Juvenile Justice System

In the Indonesian criminal justice system, the term recidive or repeat offense has not yet been explicitly formulated in the context of children in the applicable legislation, particularly in Law Number 11 of 2012 concerning the Juvenile Criminal Justice System (UU SPPA) (Nurisman, 2022). The UU SPPA places more emphasis on the principles of restorative justice and diversion efforts as stated in Article 1 paragraph (3), without providing a clear definition of how the legal system should respond to children who repeat criminal acts (Butarbutar, 2024). However, in judicial practice, the possibility of a child reoffending is not a rare phenomenon. This gap creates legal uncertainty in the imposition of sanctions and the handling of recidivist children, which can seriously impact the goal of child protection within the criminal justice system.

The results of a field study conducted at the District Court "X" on five juvenile criminal cases between 2022 and 2024 indicate that there are no standard procedures in treating recidivist juvenile offenders. In one case, a child who committed theft twice was sentenced to two years of rehabilitation at LPKA, longer than the first offender. However, in another similar case, the judge chose to impose a diversion decision. This difference occurs due to the absence of explicit legal norms that serve as technical guidelines for law enforcement in handling children who repeat offenses. Judges' decisions are more influenced by personal considerations and social moral pressure, rather than by established positive legal norms.

Theoretically, the conceptual approach in criminal law emphasizes the importance of consistency in terminology and legal structure, especially in specialized judicial systems such as juvenile justice. The ambiguity of the term "recidivism" in the SPPA Law indicates a weakness in the conceptualization of norms regarding the protection of children in conflict with the law. According to Sudarto (1981), conceptual clarity in criminal law is an absolute requirement to ensure substantive justice (Idris, 2025). If the system is unable to provide clear boundaries regarding the actions of juvenile recidivists, inconsistent and even discriminatory law enforcement practices will emerge. This shows that our legal regulations have not fully accommodated the dynamics of children's behavioral development.

For comparison, the old Criminal Code did recognize the term recidive in Article 486, but this provision did not have operational power in the context of children (Montolalu, 2021). Meanwhile, in the national Draft Criminal Code (RKUHP) which was ratified at the end of 2022 and will come into effect starting in 2026, the term recidive has begun to be given a more systematic and contextual definition. Unfortunately, there has not yet been any synchronization between the RKUHP and the SPPA Law, which opens up space for inconsistencies between the legal systems. Research by Januru et al., (2025) emphasizes that the juvenile justice system in Indonesia remains reactive to the developments in general criminal legislation and often lags behind in adopting important concepts that impact the legal status of children.

In a normative legal review, the phrase "children who repeat criminal acts" should be included as a substantive norm in the amendment or revision of the SPPA Law. Additionally, it is also important to include objective parameters regarding the intensity, timing, and type of offenses repeated by the child. Research by Syifawaru et al., (2022) shows that 40% of children entering LPKA are recidivists within less than two years after being released. This fact strengthens the argument that the absence of a recidivism norm hinders the long-term effectiveness of rehabilitation and protection for children. If not addressed promptly, the potential for negative labeling of children and violations of children's rights will only increase.

Considering the empirical findings and normative-conceptual analysis above, it can be concluded that the absence of regulations regarding juvenile recidivism in the SPPA Law creates a serious legal gap that directly impacts juvenile justice practices. To ensure legal certainty, the protection of children's rights, and the principle of non-discrimination in the enforcement of juvenile criminal law, harmonization between the new Criminal Code and the SPPA Law is needed. The government and lawmakers must formulate derivative regulations or revise certain articles in the SPPA Law to include explicit provisions regarding recidivist children, while also strengthening the principle of the best interest of the child as mandated by the Convention on the Rights of the Child (UNCRC), which has been ratified through Presidential Decree Number 36 of 1990 (Sodik et al., 2024).

The Absence of Explicit Regulations in the SPPA Law Regarding Recidivist Children

Law Number 11 of 2012 on the Juvenile Criminal Justice System (UU SPPA) normatively makes the restorative justice approach the main pillar in handling cases involving children in conflict with the law (Filonia, 2024). Article 1 paragraph (3) of the UU SPPA explicitly defines restorative justice as the resolution of criminal cases involving the perpetrator, victim, perpetrator/victim's family, and other parties (Akbar, 2022). However, when a child commits a repeated offense (recidivism), none of the provisions in the SPPA Law explicitly regulate the treatment of such a condition. This creates normative ambiguity and raises the question of whether restorative principles can be fully applied in the context of recidivist children.

The absence of norms regarding juvenile recidivism in the SPPA Law has a direct implication on judicial practice. The results of the observation of five cases of juvenile recidivists at the "Y" District Court show that law enforcement officials, particularly prosecutors and judges, are experiencing a normative dilemma. In one interview, a judge stated that when there are no explicit provisions, they tend to refer to the general Penal Code to make their decisions. However, the adult criminal code approach is not in line with the child protection philosophy that emphasizes non-penal and reintegrative principles. This indicates a tug-of-war between legal certainty and special protection for children.

This phenomenon marks the importance of the role of legal discovery (*rechtsvinding*) by judges in filling the gaps in positive legal norms. The principle of *ius curia novit* asserts that judges are considered to know the law and are obliged to seek solutions even if the written norm is not yet explicitly available. In this context, legal discovery must be carried out with the principle of caution and remain grounded in the principle of the best interest of the child. Several studies, such as those conducted by Nugraha et al. (2025), emphasize that in conditions of legal vacuum, judges must use progressive interpretation that still guarantees children's rights and does not expand the meaning of criminal law repressively.

Nevertheless, the use of *rechtsvinding* cannot be made a permanent solution in handling recidivist juvenile cases. This is because overly broad legal interpretations can create disparities in judicial practice and potentially violate the principle of legality in criminal law. Empirical facts show that two cases of children with similar repeated offenses can receive drastically different verdicts. In one case, the child was returned to the parents with supervision, while in another case, the child was sentenced to rehabilitation at a Child Special Institution (LPKA). This inconsistency underscores the urgency of normative reform in the juvenile justice system.

Furthermore, research by Sudewo (2021) revealed that 33% of the 150 children handled at LPKA underwent re-judicial processes due to recidivism cases, yet there are no specific guidelines for judges or prosecutors in responding to this. This study also notes that officials often feel caught between the choice of upholding restorative principles or adopting a repressive approach. This dilemma is what makes the Indonesian juvenile justice system still vulnerable to inconsistent and unsustainable practices, especially when dealing with children who commit repeated offenses.

Considering the complexity of practices and the weakness of the current normative umbrella, concrete steps are urgently needed to reformulate the SPPA Law to include explicit provisions regarding recidivist children. This regulation does not necessarily have to negate the principle of restorative justice, but it can provide special treatment for repeat offenders who pose a danger to the public. The harmonization between restorative and corrective approaches becomes important, while still making the best interests of the child the primary orientation. Legislators need to consider the establishment of new norms that not only bridge the gaps but also strengthen consistent and fair legal protection for all children.

The Relevance of the National RKUHP as a Future Reference Source

The Draft National Criminal Code (RKUHP) presents significant reforms in Indonesia's criminal justice system, particularly by explicitly incorporating the concept of recidivism. These provisions are outlined in Articles 64 to 72 of the National Criminal Code Draft (RKUHP), which regulate the types of recidivism, its impact on sentencing, and the conditions for sentence enhancement (Saragih et al., 2023). The provision also includes the recognition of child offenders as legal subjects who are treated differently. Although the RKUHP has not yet officially come into effect, its existence marks a more systematic direction in criminal law reform, which can fill the gaps in Law Number 11 of 2012 concerning the Juvenile Criminal Justice System (UU SPPA) (Purwanto, 2021).

The results of observations of recent academic discourse and legal journals indicate that there is a consensus among criminal law experts regarding the importance of integrating child protection principles with regulations on recidivism. Research by (N. S. Putri, 2021) suggests that the recidivism provisions in the RKUHP should be adjusted to a rehabilitative and reintegrative approach. A special clause containing provisions regarding recidivist children is very much needed so that the justice system is not solely retributive. This is in line with the principle of the best interest of the child, which has become part of both international and national instruments, including the Convention on the Rights of the Child ratified by Indonesia.

From a normative juridical approach, the Draft Criminal Code (RKUHP) can serve as a basis for transitioning towards a more holistic and just juvenile criminal justice system. The currently applicable SPPA Law does not provide a normative basis related to recidivism, so the RKUHP has the potential to become a substantive reference in the subsequent legislative process. This indicates the importance of synchronizing the SPPA Law and the RKUHP through legislative revisions or derivative policies. Kaharuddin Syah et al., (2024) state that the harmonization of national criminal law must ensure cohesion between regulations to avoid discrepancies between the spirit of protection and the implementation of criminalization.

To illustrate the normative disparity, Table 1 can be presented as follows:

Table 1. Comparison of Recidivism Regulations in the Old Criminal Code, SPPA Law, and National Draft Criminal Code

Aspect	Old Penal Code (KUHP)	Juvenile Justice System Law (UU SPPA)	National Draft Criminal Code (RKUHP)
Definition of Recidivism	Exists (general, not specific to children)	Does not exist	Exists, with special recognition for child offenders
Handling of Recidivist Children	Refers to the general system	Not explicitly regulated	Designed with an approach focused on guidance and rehabilitation
Restorative Principle	Not relevant	Yes	Accommodated in the spirit of the new law
Judicial Authority in Legal Gaps	Limited	Problematic	Supported by progressive and interpretative principles

The findings of this research indicate that the penal system for juvenile recidivists still exists in a normative gray area. The SPPA Law, as the main regulation of the juvenile justice system, does not provide explicit provisions regarding recidivism, which leads to disparities in sentencing practices. On the other hand, the RKUHP offers a more adaptive approach by accommodating different treatments for children. However, the position of the RKUHP is still in the implementation stage and does not yet have positive legal force. The imbalance between the existing norms and the prepared norms highlights the importance of formulating integrative and child-friendly legal policies.

In the context of that vacancy, the role of *rechtsvinding* by judges becomes very important. Judges, through progressive interpretation and conceptual approaches, can bridge the need for substantive justice with regulatory limitations. However, this solution is temporary and should not replace the need for structural normative renewal. Concrete steps are needed from lawmakers to revise the SPPA Law by explicitly including provisions on juvenile recidivism, while also ensuring that the substance of the RKUHP does not contradict child protection principles. Thus, the juvenile justice system in Indonesia will become more responsive to contemporary legal challenges and ensure future-oriented justice.

4. CONCLUSION

This research highlights the normative gap in the juvenile justice system in Indonesia, particularly concerning the phrase "recidivism" which has not been explicitly regulated in Law Number 11 of 2012 on the Juvenile Criminal Justice System (UU SPPA). Field findings indicate that the absence of standard procedures leads to legal uncertainty and disparities in handling recidivist juvenile cases. The main lesson from this research is the importance of conceptual clarity in juvenile criminal law to ensure the principle of the best interest of the child. The irregularities in the sentencing of juvenile repeat offenders highlight the urgency of legal reform to be more adaptive to the dynamics of children's behavior and capable of providing substantive and consistent protection. From a theoretical perspective, this underscores the need for harmonization between the principle of legality and the principle of restorative justice, while practically, there is a need for objective and applicable guidelines for law enforcement officers in handling juvenile recidivism.

This research makes a significant contribution to enriching the study of juvenile criminal law through a juridical-normative and conceptual approach that proposes of reformulating the SPPA Law. Academically, this paper updates the perspective by introducing a new legal argument regarding the importance of including juvenile recidivism as a substantive norm in the juvenile criminal justice system. The comparison table of regulations presented also clarifies the gap between the existing regulation (UU SPPA) and the one to be enacted (RKUHP), while simultaneously demonstrating the importance of integration between regulations. However, this research has scope limitations as it only focuses on five cases in one region and has not accommodated variables such as age, gender, or the social background of the child offenders. Therefore, further research is needed with broader methods, including quantitative and participatory approaches, to produce more inclusive, contextual, and applicable policies to ensure sustainable justice for children within the Indonesian legal system.

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