

LEGAL FORCE OF COURT DECISIONS AS A MEANS OF WITHDRAWING CURRENT ACCOUNTS

FITRI

Universitas Islam Syekh-Yusuf
fitri@unis.ac.id

Abstract

Indonesia's judicial system, as enshrined in the 1945 Constitution, plays an important role in law enforcement and justice. Binding and enforceable court rulings have a significant impact on law enforcement in the banking sector. The cases of Suhaemi Zakir and Bank DKI raise questions about legal certainty, legal justice, and law enforcement in the banking sector. This research with a normative jurisprudential approach analyzes legal provisions in regulations related to current account liquidation court decisions. Secondary data, including official documents, books, and research reports, were collected through literature studies at the University of Indonesia and various online sources. Qualitative analysis is conducted to interpret the data and describe the relationships and legal implications associated with the enforcement of court decisions. The review concluded that court rulings remain binding and executive in nature, and can be used as a means of disbursement of current accounts.

Keywords:

Current Account,
Legal Force,
Court Ruling

INTRODUCTION

The judicial power system in the rule of law has a crucial role in upholding law and justice. The principles of the rule of law, especially the independence of the judiciary, are regulated in the Constitution of the Republic of Indonesia Year 1945 (UUD 1945). Article 24 of the 1945 Constitution stipulates that the judicial power must be independent from the influence of other powers, so that it can administer justice without executive interference. The Supreme Court and the Constitutional Court are institutions that exercise the highest judicial power in the Indonesian judicial system.

Judicial power has three important aspects: binding, evidentiary, and executory. Court rulings have the power to be binding on the parties involved in a dispute. The verdict also has evidentiary power, where the written form of the judgment is used as evidence in related cases. Furthermore, court rulings have executory power, which means they must be applied and enforced.

In the context of banking, court rulings have a significant impact in terms of law enforcement and justice. There are situations where banks must carry out executions based on court decisions that have permanent legal force.¹ However, there is debate surrounding the interpretation of Article 49 Paragraph (2) letter b of the Banking Law which can be used by banks to refuse execution. In the case between Suhaemi Zakir and Bank DKI, the bank claimed that the phrase "for the bank" in the article gave the bank the right to refuse execution.

When court rulings are enacted and not respected by financial institutions, such as banks, this can raise questions about the enforcement of the law and the protection of constitutional rights. The case raised issues related to legal certainty, legal justice, and law enforcement in the banking sector.

¹ Putusan yang telah mempunyai kekuatan hukum tetap mempunyai tiga macam kekuatan sehingga dapat dilaksanakan, yaitu: (1) kekuatan mengikat; (2) kekuatan bukti; dan (3) kekuatan untuk dilaksanakan. Dapat dilihat di: Lilik Mulyadi, *Hukum Acara Perdata Menurut Teori dan Praktek Peradilan Indonesia* (Jakarta: Djambatan, 1998), hlm. 82.

Central Jakarta District Court Decree No. 07/Del/2013/PN. JKT. PST jo. 1485/PDT. G/2008/PN. JKT. The SEL became a central point of debate about banks' obligations to carry out the execution of current account disbursements in accordance with court rulings. Suhaemi Zakir through his lawyer took legal action by submitting an application to the Constitutional Court, which resulted in Constitutional Court Decision Number 110/PUU/XII/2014 which deleted the phrase "for banks" in the Banking Law.

In this study, the focus will be given to the analysis of the legal force of the Central Jakarta District Court Decision and the Constitutional Court Decision regarding the execution of current account disbursement between Suhaemi Zakir and Bank DKI. The analysis will highlight how such legal regulations and court rulings affect law enforcement and execution in the banking sector and their impact on ensuring fairness and protection of individual rights.

The theoretical framework used in this study includes the concepts of legal justice, legal certainty, and legal objectives. Through this analysis, this study will discuss the implications and application of relevant legal principles related to the implementation of court decision execution in the banking context.

RESEARCH METHODS

This research uses a normative juridical approach with a type of legal research. The focus is to analyze the legal rules contained in laws and regulations relating to the implementation of court decisions related to the execution of current account disbursements. This approach utilizes the statue approach method, which is an approach that involves an in-depth review of all laws and regulations relevant to the issue being handled.² This approach is used to identify and analyze the legal force of court decisions and their implications for the execution of current account disbursement in the Suhaemi Zakir case with Bank DKI.

This research has an analytical descriptive nature. Through this approach, the study outlines and provides an overview of the secondary data obtained. This secondary data is pre-existing data, such as official documents, books, and previous research reports. The data used in this study are secondary data derived from previously available sources. This type of secondary data includes various legal materials, namely: (a) Primary Legal Materials: Including Law Number 10 of 1998 concerning Banking, court decisions, and other related regulations. (b) Secondary Legal Materials: Is literature or books that explain the legal issues discussed in the research. (c) Tertiary Legal Materials: Are sources that provide guidance or explanation to primary and secondary legal materials, such as dictionaries, encyclopedias, and information sources from the internet.

Data collection is carried out through literature studies in the library of the University of Indonesia as well as access to various data sources via the internet. Data relevant to the research problem are taken from various primary, secondary, and tertiary legal materials. In this study, qualitative data analysis was carried out on secondary data that had been collected. This analysis aims to interpret the data and describe the pattern of relationships and legal implications associated with the implementation of court decisions regarding the execution of current account disbursements.

² Peter Mahmud Marzuki, *Penelitian Hukum*, (Jakarta: Prenada Media Group, 2005), h. 93.

This research was taken using the method of deductive logic. This method produces specific conclusions from statements of a general nature. The results of the analysis of the legal force of court decisions and the application of Constitutional Court Decisions are analyzed specifically from laws and regulations and other legal sources to formulate scientifically supported conclusions.

RESULTS AND DISCUSSION

In 2006, Suhaemi Zakir's gold shop in Pasar Mayestik, South Jakarta, was broken into by thieves who managed to open a safe with sophisticated equipment and steal valuables. This process takes significant time and creates noise, but the security of the market is managed by the PD. Pasar Jaya failed to prevent or detect these events. Suhaemi Zakir then sued the PD. Pasar Jaya, claimed the company was negligent in maintaining security and caused it to suffer huge material and immaterial losses. TBSP Pasar Jaya defended itself by arguing that it had assigned security to CV. Adhi Wicaksono and that the lawsuit should have been filed in a different court according to their domicile.

The South Jakarta District Court ruled on this legal action in 2009, rejecting the PD's exception. Pasar Jaya and granted part of Suhaemi Zakir's lawsuit. This ruling was later upheld by the Jakarta High Court. However, PD. Pasar Jaya felt the verdict was wrong and filed a cassation, asserting that it had taken actions in accordance with the law to manage the security of the market and that Suhaemi Zakir's losses were the result of a robbery for which the perpetrators have not been caught.

In his argument, PD. Pasar Jaya also criticized the court's interpretation of their responsibility in security, arguing that their responsibility was limited to the management of the market and its fittings, not the safety of merchandise at individual kiosks. Nonetheless, the court ruling confirms that PD. Pasar Jaya remains responsible for the overall security of the market, including the goods sold in it. This case is a significant example of the market manager's responsibility for the safety of traders and their merchandise.

Summary of the case between Suhaemi Zakir and Bank DKI which began with the decision of the Central Jakarta District Court. Suhaemi Zakir had previously won the case against the PD. Pasar Jaya and entitled to compensation of 10 kilograms of gold. However, during the execution of the PD account disbursement. Pasar Jaya at Bank DKI to meet the compensation, Bank DKI twice thwarted the execution. This triggered Suhaemi Zakir to file a lawsuit against Bank DKI based on Article 1365 of the Civil Code, arguing that Bank DKI had committed unlawful acts and caused material and immaterial losses to him.

Bank DKI, as a defendant, rejected all the arguments put forward by Suhaemi Zakir. The reasons include questions about Suhaemi Zakir's capacity as a plaintiff, objections to the party being sued, and other technical reasons related to the execution of account disbursements. Bank DKI argued that it was not a party to the trial because it never hindered execution and that the matter was still under investigation by the police.

In his ruling, the Judge pointed out that according to Article 136 HIR, the exception filed by Bank DKI should not be considered alone and should be examined together with the principal claim. Although no final decision has yet been made, the case raises serious questions about the role and responsibility of banks in legal cases like this, especially in the context of the execution of account disbursements.

Discussion

a) Analysis of the legal strength of the court decision as the basis for the execution of disbursement of current accounts in the context of payment of compensation in the case of Suhaemi Zakir with Bank DKI

Central Jakarta District Court Decree No. 07/DEL/2013/PN. JKT. PST jo. No.1485/PDT. G/2008/PN. JKT. SEL ruled that PD Pasar Jaya had committed unlawful acts and was required to pay compensation to Suhaemi Zakir amounting to 10 kilograms of gold. However, at the time of execution, Bank DKI obstructed the process by arguing that the execution could only be carried out if there was a transfer warrant or cheque/bilyet giro from PD Pasar Jaya, in accordance with Bank Indonesia regulations. Bank DKI refers to the Decree of the Board of Directors of Bank Indonesia and Bank Indonesia Circular Letter which allows withdrawal of current accounts using various methods, including cheques and other means of transfer.

In a legal context, execution is a forced act to carry out a court decision that has permanent legal force.³ In this case, Bank DKI is considered to have ignored the legal force of the decision by refusing the execution. This raises questions about the integrity and functioning of the judiciary if a judgment that has acquired legal force remains unrespected. Article 195 of the Updated Indonesian Regulations (HIR) also confirms that the winning party has the right to force the opposing party to obey the judge's decision, provided that the decision has obtained definite legal force. In this context, Bank DKI should submit to court decisions and carry out executions in accordance with applicable law.

Given the complexity and length of the information provided, efforts to create a resume will focus on the finer points of the original text. According to Sudikno Mertokusumo, the judge's decision has three main powers. First is binding force, which asserts that both parties to a case must submit to and obey the judge's ruling. These include positive meaning, where the verdict is considered absolute truth, and negative meaning, where the same matter cannot be tried again by the same judge. Second is the power of proof, where a written verdict can be used as evidence in further legal proceedings. Third is the executory power, which allows the forced execution of what has been established in the judgment by the instruments of the state.⁴

Based on this theory, the Central Jakarta District Court Determination and Supreme Court Decision related to the Suhaemi Zakir and Pasar Jaya PD cases have binding power, evidentiary power, and executory power. This decision forces related parties, including banking institutions, to submit to legal execution which is a continuation of the judge's decision which has permanent legal force. This is critical to effective law enforcement and dispute resolution efforts. In the context of Bank DKI and the criminal case involving it, the Bank is considered unlawful because it did not comply with the execution order from the court related to disbursing PD Pasar Jaya's current account to pay compensation to Suhaemi Zakir. This opens up opportunities to be sanctioned in accordance with Article 216 of the Criminal Code. In general, if court decisions are not respected or obeyed, this will threaten the integrity of the justice

³ Etto Sunaryanto, Sugiwanto dan Jose Ari Lukito, Eksekusi Panitia Urusan Piutang Negara, Direktorat Jenderal Piutang dan Lelang Negara, Jakarta, 2006, hlm. 3-4.

⁴ Sudikno Mertokusumo.2001. *Penemuan Hukum (Suatu Pengantar)*. Yogyakarta: Liberty. hlm. 182.

system and social justice. Therefore, all parties, including banking institutions, must respect and obey court rulings to ensure that legal and social order is maintained.

b) Constitutional Court Decision Number: 110/PUU/XII/2014

Constitutional Court Decision Number 110/PUU/XII/2014 challenged the enforceability of several articles in the Criminal Code (KUHP) and the Banking Law. The lawsuit was filed by Suhaemi Zakir arguing that some of the articles were incompatible with constitutional principles and harmed his constitutional rights. Zakir in particular highlighted Article 231 paragraph (3) of the Criminal Code which according to him does not provide legal certainty, as well as Article 49 paragraph (2) point b of the Banking Law which he considered unclear and potentially detrimental to him. Zakir requested revisions to these articles, including the addition of a sentence to Article 231 paragraph (3) of the Criminal Code and the removal of the phrase "for banks" in Article 49 paragraph (2) point b of the Banking Law.

The government argued that Zakir's lawsuit did not deserve to be filed with the Constitutional Court because the matter was more appropriate to be handled as a 'constitutional complaint' than a 'constitutional review'. According to the Government, Zakir's objections to some of these articles do not deserve to be tested in the Constitutional Court, as they are beyond the scope of the Court's competence. In addition, the Government also believes that Article 49 paragraph (2) point b of the Banking Law has the purpose of protecting customers and the public, and should not be deleted or revised.

After considering all the arguments and evidence presented, the Constitutional Court ruled that the phrase "for banks" in Article 49 paragraph (2) of the Banking Law is contrary to the 1945 Constitution and has no binding legal force. This ruling confirms that there are issues of fairness and legal certainty in the application of some of these articles, and requires changes to be more in line with constitutional principles.

c) Analysis Bank DKI violates Article 49 paragraph (2) point b of the Banking Law if Bank DKI disburses current accounts based on a court decision

The Banking Law in Indonesia specifically explains the criminal responsibilities and sanctions that can be imposed on bank officials and employees. Article 49 paragraph (2) point b of this Law targets bank officials who deliberately do not carry out the necessary measures to ensure bank compliance with various laws and regulations. Interestingly, "bank employee" in this context specifically refers to bank officials who have authority and responsibility related to the bank's business, not all bank employees. This is an important aspect because not all bank employees have the capacity or authority to ensure compliance with laws and regulations.⁵

Furthermore, the Conventional Banking Law has a wider scope compared to the Sharia Banking Law. Article 49 paragraph (2) point b is referred to as the "Sweeping Universe Article" because it not only links violations with the Banking Law itself, but also other relevant laws and regulations. This includes regulations that may not have existed when this Banking Act was implemented. In addition, this Banking Law is included in the category of Administrative Penal Law (APL), which places

⁵ Ali Condro Bawono, *Siapa Saja yang Termasuk Pejabat Bank?*, dapat diunduh di: <http://www.m.hukumonline.com/klinik/detail/c16290/siapa-saja-yang-termasuk-pejabat-bank>,

criminal law as the ultimate remedium in law enforcement. This means criminal sanctions will only be imposed after administrative measures have been taken.⁶

However, there are some limitations and ambiguities in this Act that need to be noted. One is the interpretation of the "necessary measures to ensure bank compliance," which is often misinterpreted as a violation of the bank's Standard Operating Procedures (SOPs).⁷ This could result in unnecessary criminalization of bank employees. In addition, the criminal provisions of Article 49 paragraph (2) point b are limited to the legal subjects of commissioners, directors, and employees of the bank. This can be a problem when there are parties from outside the bank who are also involved in violations, as they cannot be prosecuted under this article. Therefore, law enforcers often use more general regulations, such as the Criminal Code or the Law on the Eradication of Corruption, to ensnare perpetrators outside the bank.

Jurisprudence related to Article 49 paragraph (2) point b of the Banking Law in Indonesia shows variations in its application by the courts. An example is the West Jakarta District Court's properly applied ruling, punishing two Bank Citra executives for failing to comply with written instructions from Bank Indonesia to correct banking violations committed. On the other hand, the verdict from the South Jakarta District Court against three Bank Rakyat Indonesia employees shows improper application. These employees are punished even though their violations can actually be dealt with first through administrative action. To prevent misinterpretation and application of the law, it is necessary to equalize perceptions between banking authorities, the banking industry, law enforcement, and academia. There is also a need to revise the Banking Law to make it clearer.

The case of Bank DKI which uses Article 49 paragraph (2) point b as a reason for not executing account disbursements also shows problems in the application of this law. Bank DKI misinterpreted this provision and ultimately resulted in Suhaemi Zakir, as the victim, not getting legal certainty and proper compensation. In a broader context, Article 49 paragraph (2) point b is actually intended as the ultimate step of remedium, where criminal sanctions are only applied after the bank does not comply with warnings and corrective actions given by Bank Indonesia. This includes violations of provisions such as BMPK, GWM, PDN, and CAR. In the case of formal delict such as BMPK violations, even though improvements have been made, the perpetrator is still considered to have committed a criminal offense and is still convicted.

In the case of Bank DKI which took refuge under the provisions of Article 49 paragraph (2) of the Banking Law, it turned out that there was a misunderstanding of the law that had serious consequences. Bank DKI's interpretation is considered wrong, especially because of the decision from the Central Jakarta District Court which should be the basis for the execution of PD Pasar Jaya account disbursement. The phrase "for banks" in the article creates vagueness and causes Bank DKI to ignore court decisions. As a result, this act is considered a violation of Article 28D of the 1945 Constitution. Deficiencies or weaknesses in this legal formulation indicate that the regulation can be misused or interpreted erroneously, thus interfering with the administration of justice.

⁶ Yunus Husein, *Pasal Sapu Jagad Pada Undnag-Undang Perbankan*, dapat diunduh di: <http://www.m.okezone.com/read/2014/04/02/279/963982/pasal-sapu-jagad-pada-uu-perbankan>

⁷ *Ibid.*

According to Gustav Radbruch, there are three legal values or objectives that must be considered: legal certainty, justice, and expediency. In this case, legal certainty appears to be sacrificed for the sake of justice and expediency, a situation that Radbruch says is an inevitable antinomy or internal conflict in law. Radbruch himself eventually revised his views after witnessing how the theory of legal certainty was used to legitimize atrocities during wartime. In practice, enforcing the law does require a compromise between the three elements, although it is often difficult to strike a balance.⁸

More broadly, the role of law in society is to achieve justice, certainty, and expediency. Justice involves the recognition and protection of human rights, as well as their fair application before the law. Legal certainty means that regulations must be made and applied in a clear and consistent way, with no room for multiinterpretation or subjectivity. Meanwhile, the expediency of law involves the positive impact of the application of law on society. This could be crime prevention or, in a judicial context, a verdict that provides certainty and a fair solution for the parties involved. In order to meet this goal, there needs to be continuous review and reform of the law, including corrections to ambiguous or easily misinterpreted articles, such as Article 49 paragraph (2) of the Banking Law in this case.

CONCLUSION

Based on the analysis and description in the previous chapters, it can be concluded that court decisions that have acquired legal force still have binding and executory force. Bank DKI is obliged to implement and respect the court decision regarding the disbursement of PD Pasar Jaya's current account for compensation payments to Suhaemi Zakir. In addition, Bank DKI did not violate Article 49 paragraph (2) point b of the Banking Law but instead misinterpreted and applied the article. The Constitutional Court decision that invalidated the phrase "for banks" from Article 49 adds to legal certainty and legal expediency.

Recommendations

1. To Banks: It is recommended that all banks, including Bank DKI, always comply with court decisions that have permanent legal force. This compliance is important to realize justice and legal certainty, and also to avoid potential criminal and other legal sanctions.
2. To the Government: The Government is advised to revise the Banking Law to provide legal clarity and certainty, especially regarding Article 49 paragraph (2) point b. This revision is needed to avoid misinterpretation or application of laws that can harm other parties, as happened in the case of Suhaemi Zakir with Bank DKI.

With these conclusions and recommendations, it is hoped that it can provide guidance for all relevant parties to act in accordance with applicable law and realize justice for all parties.

REFERENCE

Abdul Latif. 2004. *Reformasi dan Paradigma Penegakan Hukum Menuju Pemerintahan yang Bersih*. Yogyakarta: UII Press.

⁸ Sudikno Mertokusumo, *Mengenal Hukum*, (Yogyakarta: Universitas Atma Jaya, 2010), hlm. 161.

- Adji, Oemar Seno. 1980. *Peradilan Bebas Negara Hukum*. Jakarta: Erlangga.
- Imam Prayogo Suryohadibroto dan Djoko Prakoso 1995. *Surat Berharga (Alat Pembayaran Dalam Masyarakat Modern)*. Jakarta: PT. Rineka Cipta.
- Ismail, *Akutansi Bank: Teori dan Aplikasi dalam Rupiah*. 2011. Jakarta: PT.Kencana Parnada Media Grup.
- Kasmir. 2012. *Dasar-Dasar Perbankan*. Jakarta: PT. Raja Grafindo Persada.
- L. J. Van Apeldorn. 2004. *Pengantar Ilmu Hukum*. Jakarta: Pradnya Paramita.
- M. Natsir Asnawi. 2014. *Hermeneutika Putusan Hakim (Pendekatan Multidisipliner dalam Memahami Putusan Peradilan Perdata)*. Yogyakarta: UII Press.
- M. Bahsan. 2005. *Giro dan Bilyet Giro Perbankan Indonesia*. Jakarta: PT. RajaGrafindo Persada.
- M. Yahya Harahap. 2006. *Pembahasan Permasalahan dan Penerapan KUHAP (Pemeriksaan Sidang Pengadilan, Banding, Kasasi, dan Peninjauan Kembali)*. Jakarta: Sinar Grafika.
- Mulyadi, Lilik. 1998. *Hukum Acara Perdata Menurut Teori dan PraktekPeradilan Indonesia*. Jakarta: Djambatan.
- Munir Fuady. 2013. *Perbuatan Melawan Hukum*. Bandung: PT. Citra AdityaBakti.
- Ny. Retnowulan Sutantio dan Iskandar Oeripkartawinata. 2009. *Hukum Acara Perdata dalam Teori dan Praktek*. Bandung: Mandar Maju.
- Peter Mahmud Marzuki. 2005. *Penelitian Hukum*. Jakarta: Prenada Media Group.
- Raharjo, Satjipto.2010. *Penegakan Hukum Progresif*. Jakarta: PT. Kompas Media Nusantara.
- Saifullah. 2007. *Refleksi Sosiologi Hukum*. Bandung: Refika Aditama.
- Subekti. 1978. *Kamus Hukum*. Jakarta: Pradnya Pramita.
- Sudikno Mertokusumo. 1993. *Hukum Acara Perdata Indonesia*. Yogyakarta:Liberty.
- Sudikno Mertokusmo.2001. *Penemuan Hukum (Suatu Pengantar)*. Yogyakarta: Liberty.
- Tambunan, Tulus. 1998. *Krisis Ekonomi dan Masa Depan Reformasi*. Jakarta: Lembaga Penerbit Fakultas Ekonomi Universitas Indonesia.

Putusan Pengadilan

Putusan Pengadilan Negeri Jakarta Pusat Nomor 176/PDT.G/2014/PN.JKT.PST.

Putusan Mahkamah Agung Republik Indonesia Nomor 814K/Pdt/2011.

Putusan Mahkamah Agung Republik Indonesia Nomor 283PK/Pdt/2013.

Putusan Mahkamah Konstitusi Nomor 110/PUU-XII/2014.

Majalah

-----"Taati Putusan Pengadilan". *Konstitusi No. 101*. Mahkamah Konstitusi(Juli 2015).

Internet

-----"Apa Itu Kepastian Hukum?" dapat diakses di:
<http://yancearizona.wordpress.com/2008/04/13/apa-itu-kepastian-hukum/>,
diunduh pada tanggal 05 Desember 2015.

-----"Kepastian Hukum", dapat diakses di:
<http://www.surabayapagi.com/index.php?>, diunduh pada tanggal 05

Desember 2015.

Achmad Ali, Reaksi Proporsional atas Putusan Hakim, dapat diunduh di: <https://yudhitc.wordpress.com/2009/01/16/reaksi-proporsional-atas-putusan-hakim/>, diunduh 08 Desember 2015.

Ali Condro Bawono, *Siapa Saja yang Termasuk Pejabat Bank?*, dapat diunduh di: <http://www.m.hukumonline.com/klinik/detail/c16290/siapa-saja-yang-termasuk-pejabat-bank>, diakses pada tanggal 08 Desember 2015.

Goesnadi, Kusnu. "Prinsip Dasar Kekuasaan Kehakiman" <https://kgsc.wordpress.com/prinsip-dasar-kekuasaan-kehakiman/>, diunduh 05 September 2015.

Oey Hoey Tiong, "Master Settlement and Acquisition and Agreement II" dapat diakses di: m.hukumonline.com/berita/baca/hol4972/master-settlement-and-acquisition-and-agreement-ii, diunduh pada tanggal 03 Desember 2015.

Sutan Remy Sjahdeini, *Tindak-Tindak Pidana Perbankan Indonesia*, dapat diunduh di: <http://www.pkh.komisiyudisial.go.id>, diakses pada tanggal 08 Desember 2015.

Yunus Husein, Pasal Sapu Jagad Pada Undnag-Undang Perbankan, dapat diunduh di: <http://www.m.okezone.com/read/2014/04/02/279/963982/pasal-sapu-jagad-pada-uu-perbankan>, diakses pada tanggal 30 November 2015.

Peraturan Perundang-undangan Indonesia. *Undang-Undang Dasar 1945*. Kitab Undang-Undang Hukum Acara Perdata. Kitab Undang-Undang Hukum Pidana. Kitab Undang-Undang Hukum Dagang. Indonesia. *Undang-Undang Tentang Perbankan*. UU No. 10, LN No. 182 Tahun 1998. TLN No. 3790. Indonesia. *Undang-Undang Tentang Kekuasaan Kehakiman*, UU No. 22 Tahun 2004.