Implementation the Concept *of Restorative Justice* in the Settlement of Special Crimes of Trademark Counterfeiting

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Abstract

The act of counterfeiting the mark has brought harm to the victim, preferably for The act of counterfeiting the brand attached to it is a criminal sanction for the application of the concept of Restorative Justice which focuses on the conditions of creating justice and balance for criminal offenders and victims with restoration which is a restoration of rights between victims and perpetrators. The research method used in this study is doctrinal, with source material in primary, secondary, and tertiary legal materials. This study resulted in two advantages of using Restorative Justice on the specific crime of trademark forgery. First, Restorative Justice can be a policy choice for law enforcement officials. Because the interests of victims need to be considered in the process. In addition, Intellectual Property Rights are the realm of economics or business where the victim must suffer a large loss if there is a violation. Second, law enforcement against specific criminal acts of trademark rights through Restorative Justice can be a criminal law reform which is an alternative way to carry out punishment with the aim of justice.

Keywords: Restorative Justice; Counterfeiting; Trademark.

Introduction

The ratification of the Trademark and Geographical Indications Law Number 20 of 2016, hereinafter referred to as the Trademark and Geographical Indications Law, is intended to provide certainty and legal protection through one system. In the case of the exercise of exclusive rights granted by the state to the owner of a registered trademark for a certain period of time by using his own trademark, or *licensing* or permitting another party to use it as a distinguishing mark for a particular item which is aimed at the existence of the trademark itself in order to establish the brand reputation

for that product. Trademarks that are a means to distinguish and build product reputation and recognition by consumers.[1] According to the criminal provisions in Article 100 paragraph (1) and paragraph (2) of the Trademark and Geographical Indications Law Number 20 of 2016 of 2016 of 2016 stipulate that whoever produces the same as a registered trademark belonging to another person and/or uses the trademark dishonestly to trade goods or services of the same kind with criminal provisions imprisonment for a maximum of 5 (five) years. and/or a maximum fine of IDR 2,000,000,000.00 (two billion rupiah). Any person who unlawfully uses a trademark that is essentially the same as a registered trademark belonging to another person for similar goods and/or services produced and/or traded shall be sentenced to imprisonment for a maximum of 4 (four) years and/or a fine according to the law and a maximum fine of Rp 2,000,000,000.00 (two billion rupiah). This provision certainly emphasizes the consequences of using a trademark in a manner detrimental to its owner or holder.

The provisions of criminal law listed here include misuse of a trademark by an irresponsible person or legal entity, without a license, that, in principle, infringes on a registered trademark. Large-scale trademark infringement cases in Indonesia, recorded in 45 cases, led to criminal charges, including trademark counterfeiting, between 2010 and 2022. Based on the court case, namely the Metro Commercial Court Number 28/Pid.B/2013/PN. M, who committed the crime of counterfeiting the rights of the "MENTARI" rice brand, with decision No. 3004/Pid.Sus/2018/PN Sby at the Surabaya District Court, Purbalingga District Court, with Decision No. 115/Pid.Sus/2020/PN Pbg regarding the copyright of Bonita brand mattresses. In this case, the defendant's explanation that he objected to the verdict so that he was sentenced to prison expressly for taking it in a way that was detrimental to the victim, and vice versa that the implementation of the *concept of Restorative Justice* which focuses on creating fair and

[1] Intan Purnamasari, "Legal Protection of Famous Brands in Indonesia (Case Study of Supreme Court Decision Number 264K/PDT. SUS-HKI/2015)," *Journal of Legal Sciences: ALETHEA* 2, no. 1 (2018): 1–16.

balanced conditions for the perpetrator and the victim through rehabilitation of the restoration of the relationship between the victim and the perpetrator.

Efforts to resolve cases created in this way can not only address the problems that arise but also foster a sense of justice in society.[2] The implementation of the concept of *Restorative Justice* in dealing with specific crimes, such as trademark forgery, restores rights that should belong to the victim as a result of the damage he or she suffers, and restores the balance in the use of the trademark between the suspect and the victim. In this concept, the perpetrator has a mechanism for compensation, mediation, social work, or other agreements to find the best solution agreed upon by the parties. The formulation of problems for the recovery of victims of trademark counterfeiters is how to regulate and apply the concept of *Restorative Justice* to the settlement of trademark counterfeiting cases in the category of special crimes.

Research Methods

This research employed a theoretical approach. With a dogmatic approach, this study focuses on norms as a research objective, analyzing their relationship with content analysis and the strengthening of legal theories and principles. The author will analyze the application of the concept *of Restorative Justice* against certain trademark fraud and see the positive impact of the application of this concept *of Restorative Justice* to the specific crime of trademark counterfeiting. The doctrinal approach in question is supported by a juridical-normative, conceptual approach *(conceptual approach).* This approach will combine relevant legal facts and theories to inform the formulation of the problem in this study.

Results and Discussion

Regulation on the Implementation of the *Restorative Justice Concept* in Indonesia

[2] Restorative Justice Approach in the Indonesian Criminal System – Sabang District Court Class II, N.D.)

Regulations regarding the application of the *concept of Restorative Justice have,* until now, lacked a clear legal basis for handling special criminal cases against brands within a restorative justice system.[3] However, law enforcement against trademark counterfeiting can adopt policies as stated in the National Police Regulation of the Republic of Indonesia Number 2021 on the Restorative Criminal Justice Process. In the event that the criminal investigation process is carried out by the investigator on the basis of a notification or public complaint that a criminal act has occurred, it will certainly be followed up by recording a police report, and after completing the report by entering a management order, the inspector marks the report and proceeds to investigate the report or report the crime. The process of this investigation is carried out to identify the criminal act, including providing first aid at the scene, taking fingerprints/other identifying information, gathering information, and gathering evidence. In addition, after collecting evidence and witnesses, investigators can arrest the suspected perpetrator and try him in court, so that he can be punished for his actions.

In this case, the enforcement process in terms of *Restorative Justice* of the perpetrators of criminal acts who are suspected of being perpetrators and victims, as in practice, will be followed up to the authorities in terms of data collection, which has been carried out, and the perpetrators have been examined and investigated for suspected victims and perpetrators.[4] In this case, the enforcement process in terms of *Restorative Justice* of the perpetrators of criminal acts who are suspected of being perpetrators and victims, as in practice, will be followed up to the authorities in terms of data collection, which has been carried out, and the perpetrators have been examined and investigated for suspected victims and perpetrators.[5] In the free financing in

[3] Eva Achjani Zulfa, "Restorative Justice in Indonesia (Study on the Possibility of Applying Restorative Justice Approaches in Criminal Law Enforcement Practice)," *University of Indonesia*, 2009, 3–4.
[4] Haryanto Ginting and Muazzul Muazzul, "The Role of the Police in the Implementation of Restorative Justice for Perpetrators of Criminal Acts of Demolition Committed by Children and Adults," *Scientific Journal of Law Enforcement* 5, no. 1 (2018): 32–40.
[5] Muriyanto Muriyanto, "Juridical Analysis of the Role of the Police in Tackling Traffic Violations through Restorative Justice in the Jurisdiction of the Ogan Komering Ilir Resort Police (Polres)," *VERITAS* 8, no. 1 (2022): 94–108.

Restorative Justice at the Prosecutor's Office as in the Decree of the Chief Prosecutor's Office dated 2020 and Number 15 concerning the Termination of Criminal Prosecution on the Basis of Judicial Rehabilitation which has given instructions to the prosecutor's office to discontinue the case process in terms of applying aspects of justice, this application is certainly to look at the public interest which in this case is a last resort so that it will be related to the concept *of Restorative Justice*.

The implementation of *Restorative Justice* in the event of a peaceful effort carried out by the public prosecutor, in which case there is peace that will be carried out in terms of the prosecutor against both parties, namely the suspect and the victim. The flow of peace efforts began with the prosecution of the victim, followed by the disclosure of the victim's reasons, and was followed by the involvement of the victim's family, suspects, community leaders/representatives, and other interested parties. If the proposal is accepted at the trial, the case will be dissolved; if it is rejected, the matter will be referred to the judicial authorities.[6] Based on the above items, the concept was solved by *Restorative Justice* even though the term can only be used in criminal cases, it does not rule out the possibility of its use in other cases, provided that the condition is met and it is expressly stated that this term is not used for serious crimes such as terrorism, crimes can be in the form of crimes of national security violations, crimes of violation of human life.

One of the applications that can be implemented is Intellectual Property Rights, specifically trademarks, which must form the concept of *Restorative Justice* because, according to the properties and conditions described, they do not contradict or violate the requirements of *the Restorative Justice brand*. Protection of intellectual property rights that, according to the nature of the risk, result in personal and collective interests and violation of exclusive rights or rights related to economic value that are illegal or illegal for others, so that this protection provides provisions for individual economic

[6] Gita Santika Ramadhani, "The Role of the Prosecutor's Office in Realizing Restorative Justice as an Effort to Combat Crime," *PROGRESSIVE: The Law Journal* 15, no. 1 (2021): 77–91.

aspects.[7] The provision for handling actions against intellectual property rights violations by applying the concept of *Restorative Justice, which provides a* mutually beneficial solution to identify the perpetrator, the victim, and the community that mediates to find a solution.

The implementation of settlement of intellectual property rights within the framework of *Restorative Justice* is, of course, intended to achieve the goal of settlement, ensuring that the value of justice (*Justice*) is delivered to the victim, in this case, the owner of exclusive rights and related rights. From these two concepts, a common foundation can be drawn for a common goal to be achieved in principle: the creation of justice. The concept of *Restorative Justice* not only supports the oppression of oppressors but also creates justice in the form of prosperity and happiness for the people of their country, given the nature of the legal objectives of each, with comments. Indonesia's concept of *Restorative Justice* is reflected in the criminal justice system through Law Number 11 of 2012, Article 1, which states that the Concept of *Restorative Justice* later became the prefix and pioneered the use of the term *Restorative Justice.*

The birth of the concept of *Restorative Justice* does not mean that prisons are abolished; in some cases, causing mass damage and involving human lives, prisons can continue to be used. The suggestion of *Restorative Justice* with Justice is simple: it can promote the principle of low and affordable costs, better guarantee legal certainty, and implement social justice.[8] *Restorative Justice* in the settlement of intellectual property rights cases is a law-enforcement concept that focuses on the interests of criminals, victims, and society. The purpose of *Restorative Justice* is to restore the status of a company that is not good due to unlawful acts. Therefore, the concept of Restorative Justice is expected to bring another perspective to this issue. The *Restorative Justice*

[7] Tito Abadia Putra, Muhamad Juliarachim, and Sulistyanto Widagdo, "The Application of Restorative Justice as a Resolution to Eradicate Intellectual Property Rights Crimes in Indonesia," *Echo* 27, no. 50 (2015): 61636.
[8] Yoachim Agus Tridiatno, *Restorative Justice* (Yogyakarta: Cahaya Atma Pustaka, 2015), 27.

hearing aims to provide options for criminal case efforts, with the solution being considered. Currently, the Indonesian legal system is beginning to accept the concept of *Restorative Justice*. This concept has been applied in several criminal cases, including juvenile justice cases, theft, and abuse. The birth of the concept of *Restorative Justice* as an alternative to resolving cases in the judicial system, so that, to resolve this case, it is necessary to take the first steps to address problematic conflicts between perpetrators and victims.

The Use of the *Alternative Dispute Resolution* System in Trademark Special Crimes Cases

The provisions on the implementation of *the Alternative Dispute Resolution* (ADR) system include settlements, namely judicial disputes and forms of dispute resolution that are not disputed. Dispute resolution for intellectual property rights infringement in Indonesia can be carried out through three procedures: administrative prosecution, civil prosecution, criminal prosecution, and alternative dispute resolution. Intellectual property disputes are often resolved through criminal channels, including piracy, fraud, trademark infringement, or destruction of intellectual property. In this case, of course, the settlement process is preceded by the detection of intentional infringement of a well-known trademark or by an action against a similar work. The existence of alternative dispute resolution can be seen in the length of the dispute resolution process, the difficulty of reaching final decisions and appeals, the high costs, the defendant's procedural rights, and the many criticisms of various judicial authorities (litigation). This leads to a deterioration in relations between the parties and the emergence of new differences of opinion/conflict.[9]

From these criticisms, it is believed that the burden of disagreements does not reflect peace and kinship. The advantages of alternative dispute resolution mechanisms

[9] S Soetrisno, *Medical malpractice and mediation as an alternative to dispute resolution* (New York: University of Wisconsin, 2010), 4.

compared to judicial bodies are that they are voluntary, fast, timesaving, cost-effective, and relationship-maintaining. Alternative dispute resolution in trademark special criminal cases is regulated in Article 93: "In addition to the ownership process described in Article 83, the parties may resolve the dispute through arbitration or alternative dispute resolution." Further, the dispute through the process, as referred to in Article 83 paragraph (1) (2) (3), is as follows:

1) The Registered Trademark Owner and/or the Brand Licensor may bring a lawsuit against another party who uses the same basic mark or a very similar mark for similar goods and/or services without permission, in the following ways: a. to be compensated; and/or b. Cessation of all lawsuits related to the use of trademarks.
2) Acts as referred to in paragraph (1) can also be carried out by the owner of a known trademark based on court determination.
3) The process, as intended in paragraph (1), is submitted to the Commercial Court.

In the case of settlement of trademark disputes under the current legal system, as regulated by the Trademark and Geographical Indications Law, if an agreement has been reached and there are parties, there is a way to resolve the dispute and get out of the way through the litigation route to the commercial court. who break their promises/defaults, followed by non-judicial channels such as mediation, negotiation, or arbitration. While the legal remedies are clear but have weaknesses, for example, there is no country in this case, so if you want to sue the damaged brand, you must call the owner and invite the infringer to mediate, it does not rule out the possibility that the infringer is outside the city/in a place that cannot be reached by the trademark owner and can result in the brand owner not receiving compensation money by rejecting the invitation to mediate and flee.

Having the right to receive this is where the application of which must certainly be balanced with a new system that presents the concept *of Restorative Justice*, in the perspective of criminal complaints which is an intermediary when the state in public law is needed in the form of state tools such as the police, the prosecutor's office, when the police search and arrest the perpetrators and allow both parties to make peace with the police. According to Burt Galaway and Joe Hudson, the concept of justice is closely

related to that of restorative justice. The elements are very basic: *first*, crime is considered a conflict between individuals that harms the victim, society, and the perpetrator. *The second* is the purpose of the judge's judicial process. In the criminal justice process, it is necessary to restore peace in society by repairing the damage caused by conflict. *These three* processes must encourage the active participation of victims, perpetrators, and the community in finding legal solutions to conflicts.[10] A basic element of the recovery approach, as demonstrated by Burt Gallaway and Jose Hudson, provides the understanding that the victim has full authority in the process, as the affected party of the loss or damage resulting from the crime. Solving and getting rid of the crime.

This interpretation has a reasonable consequence for the meaning and understanding of crime, where crime is no longer considered an unlawful act that must be punished by the state, but an act that can be dealt with by compensation or other punitive measures. Mediation is a form of alternative dispute resolution that uses an out-of-court process with a mediator. Mediation is often used to resolve legal disputes; in criminal law, it is also called criminal mediation. Criminal mediation is a process of bringing together victims and perpetrators of crime, in which the parties agree to resolve the problem with the help of a mediator.[11] Criminal mediation embodies *Restorative Justice, emphasizing* justice for victims and perpetrators of crime and positioning them as key parties in recovery. Criminal mediation is an institution that handles criminal cases in the criminal justice process in Indonesia, and there is a principle provision that all criminal acts cannot be reconciled except through criminal cases, i.e., criminal complaints.[12] From this mediation's perspective, it is certainly part

[10] Burt Galaway and Joe Hudson, *Criminal Justice, Restitution, and Reconciliation* (New York: Criminal Justice Press Monsey, NY, 1990), 2.
[11] Diah Ratna Sari Hariyanto, "The Construction of Penal Mediation in the Settlement of Petty Crimes in Indonesia," *Dissertation at Udayana University, Denpasar* (2018).
[12] I am a Christian, I am a Christian, and I am a Christian, and I am a Christian. *Out-of-Court Dispute Resolution* (Bali: Udayana University Press, 2010), 104.

of the application of *the concept of Restorative Justice,* which prioritizes the recovery aspect of settling intellectual property cases, namely brand cases.

Application and Application of the Concept *of Restorative Justice* in the Settlement of Special Crimes of Trademark Counterfeiting

The concept of handling intellectual property rights infringement actions through *Restorative Justice,* towards a mutually beneficial solution, finds the perpetrators, victims, and the community working together and immediately seeking a solution that is fair for all. This is certainly intended to clarify the concept *of Restorative Justice and* to achieve the value of justice for the victim, in this case, the owner of exclusive rights and related rights. In both concepts, a common foundation can be drawn for a common goal, namely the achievement of justice. *Restorative Justice* not only supports the oppression of oppressors but also creates justice in the form of prosperity and happiness for the people of the country, given the law's purpose.

Criminal law is a legal doctrine that regulates general provisions, distinct from criminal law, which is only a general criminal law in the field of crime. Civil criminal law is part of criminal law; in addition to being the content of criminal law in the law, it also includes the content of official criminal law, or, in other words, the content of civil criminal law is expanded across various laws. Specifically, to regulate legal norms and legal materials. It can be concluded that private criminal law has several characteristics that distinguish it from general criminal law. This difference can be seen in both the nature of substantive criminal law and that of formal law. The difference can be seen in legal institutions, courts, and legal entities. This means that, as long as criminal sanctions are applied in trademark cases, they are determined not by the principles stipulated in the Criminal Code but by the criminal elements set out in the articles of association. Laws on trademarks, as one of the possible types of trademark infringement, are covered by Article 100 paragraph (1) and paragraph (2) of the Trademarks and Geographical Indications Act 2016.

Win-Win Solution in Business Civil Law

Implementation of the concept of *Restorative Justice* Trademark rights for certain violations through the rights of the perpetrator, by not being imprisoned after the perpetrator receives the consequences of the crime in the form of compensation, or by carrying out various activities at the common discretion of all parties. For victims, recovery of benefits due to damage caused by the perpetrator is achieved through peace compensation or other agreements, resulting in the best settlement agreed upon by the parties. In applying *the concept of Restorative Justice*, the community around where the respondent was asked for information, from complaining about the brand owner to the police, then the police investigated trademark counterfeiting by searching for evidence. This investigation into the incident was implemented after the police confirmed that a criminal act had been committed. The police summoned the victim and the perpetrator to criminal mediation to negotiate. If the mediation was successful, the result of the agreement was in the form of a written agreement and was resolved reasonably, namely, if the intellectual property rights *were restorative justice.*

If mediation fails, the police then continue the report to the Attorney General of the Republic of Indonesia, and the prosecutor's office, before the prosecution, will involve the perpetrator, the victim, and their families, as well as related community figures/representatives. If mediation is successful, the prosecutor initiates the conciliation process, the prosecutor's office gives the perpetrator 14 days to fulfill his responsibility to the victim, and this process is carried out at the prosecutor's office. The operation settled the case peacefully, and no charges were filed. But if there is no agreement between the two parties, the prosecutor's office will take the case to court. The jury, with the freedom to discover, delve into, and understand the values of law and the sense of justice that lives in society, upholds progressive laws and applies *Restorative Justice* in matters not specified by these laws and regulations. Therefore, applying the concept *of Restorative Justice* to certain brand rights can be the right choice for all parties involved to enforce the law and ensure justice. Especially on the victim's side, because trademark fraud law often infringes on the victim's personal

interests. In addition, Intellectual Property Rights, especially trademarks, fall under the civil economy and the commercial sector; if there is a violation, those affected will, of course, suffer significant losses.

This is considered one of the efforts to seek an out-of-court settlement in the mediation process. *Restorative Justice is a* solution that also criticizes the criminal justice system, as the prison system is no longer effective at resolving social conflicts. This is because the parties involved do not participate in mediation, the victim remains a victim, the perpetrator is in prison, which causes new problems for the family, and so on. A model in which everything works, *Restorative Justice.* In this case, if the victim's rights and losses have been compensated, the victim and society have forgiven, and the perpetrator has shown remorse, the perpetrator does not need to go to jail. This model should be adopted by the police when first investigating a case. The situation is the same in the judiciary and the courts. As in the verdict No. 63/Pid.B/2021/PN Skm between the defendants Edi Yanto bin Mak Syah and Rahmatul Wahyu Bin Bustami, it was reported that the defendant groped the victim by hitting his right hand three times, resulting in injuries to the victim. and become dizzy.

Considering that the defendant's actions may be charged under Article 351(1) of the Criminal Code, initially, the defendant and the victim did not compromise; then peace prevailed among the participants. Explain the details. As stated in the peace letter dated September 28, 2021, between the Gampong witness and the Gampong victim witness, the defendant's family and community leaders, the judge then decided that the trial was held according to the Peusijeuk customary rite recorded by the victim. Ngatemin, S.H., M.H., as the defendant and his extended family, the Secretary of Pulo le Village representing the people of Pulo le, which is the defendant's residence, and the Chairman of the Suka Makmue District Court, were subsequently examined by the jury. If the defendant's criminal background constitutes a violation of Article 351, Paragraph (1), of the Criminal Code, it is not considered a crime determined by law. *Restorative Justice* considers that Article 351(1) of the Criminal Code applies. *Restorative Justice*, because not only § 351 paragraph 1 vi. The code of ethics is not

considered a serious offense and is still classified as light, causing only bruises that will ultimately be decided by the judge. *Restorative Justice* and the defendant's release from all demands and interests of the defendant. This decision can serve as a reference for cases involving intellectual property rights that have not yet been implemented. *Restorative Justice* According to Article 5 of the Law on Judicial Organization No. 48 of 2009, judges and constitutional judges are responsible for fostering, upholding, and understanding legal values and a sense of justice in people's lives. The author's point of view can serve as an umbrella rule for the application of progressive law and *Restorative Justice*.

Conclusion

Intellectual property rights, especially trademark rights, are an economic and commercial field in which the affected person will inevitably suffer great losses if violated. There is a violation of the owner's economic rights. Trademarks, the damaged owner in this case can claim compensation or alternative dispute resolution or arbitration, but there is a loss to enforce the case through this civil remedy, i.e. the state is not present in this case, so if you want to use out of the legal process, the trademark owner must find the culprit and go through mediation; The trademark owner will deny access and mediate and be avoided. The new system must be *Restorative Justice.* It could be a political choice for law enforcement. In the case of trademark forgery, a criminal act that attacks the interests of individual victims, the state, represented by state institutions such as the police, prosecutor's office, and courts, must be present and act within its capacity. The concept *of Restorative Justice* as stated in the Regulation of the National Police of the Republic of Indonesia Number 8 of 2021 regulates the Handling of Crimes Based on Restorative Justice and the Regulation of the Prosecutor's Office of the Republic of Indonesia Number 15 of 2020 concerning the Termination of Prosecution Based on Restorative Justice that the position of this regulation will apply the concept of justice. In this process, it is essential to pay close attention to the interests of the victims. Of course, if intellectual property rights are used in *the criminal process*

of Restorative Justice, because the interests and rights of the victim are also considered in the trial, the victim can feel satisfied with all the losses they have suffered.

The focus is on a type of win-win solution that positions the perpetrator, the victim, and the community as actors who work together to find a solution that is fair to all parties. If the victim's rights and losses are restored, the victim and the community are forgiven, and the perpetrator shows remorse, then the perpetrator does not need to go to prison. In addition, the anti-crime law includes a specific provision on trademark rights. *Restorative Justice* can be a restoration of criminal law, an alternative form of punishment for the sake of justice.

References

Galaway, Burt, and Joe Hudson. *Criminal Justice, Restitution, and Reconciliation*. New York: Criminal Justice Press Monsey, NY, 1990.

Ginting, Haryanto, and Muazzul Muazzul. "The Role of the Police in the Implementation of Restorative Justice Against Perpetrators of Demolition Crimes Committed by Children and Adults." *Scientific Journal of Law Enforcement* 5, no. 1 (2018): 32–40.

Hariyanto, Diah Ratna Sari. "The Construction of Penal Mediation in the Settlement of Petty Crimes in Indonesia." *Dissertation at Udayana University, Denpasar*, 2018.

Muriyanto, Muriyanto. "Juridical Analysis of the Role of the Police in Dealing with Traffic Violations through Restorative Justice in the Jurisdiction of the Ogan Komering Ilir Resort Police (Polres)." *VERITAS* 8, no. 1 (2022): 94–108.

"RESTORATIVE JUSTICE APPROACH IN THE INDONESIAN CRIMINAL SYSTEM – SABANG DISTRICT COURT CLASS II." Accessed July 27, 2023. https://www.pn-sabang.go.id/?p=5457.

Purnamasari, Intan. "Legal Protection of Famous Brands in Indonesia (Case Study of Supreme Court Decision Number 264K/PDT. SUS-HKI/2015)." *Journal of Legal Sciences: ALETHEA* 2, no. 1 (2018): 1–16.

Putra, Tito Abadia, Muhamad Juliarachim, and Sulistyanto Widagdo. "The Implementation of Restorative Justice as a Resolution for the Eradication of

Intellectual Property Rights Crimes in Indonesia." *Gem* 27, no. 50 (2015): 61636.

Ramadhani, Gita Santika. "The role of the prosecutor's office is to realize restorative justice as an effort to combat crime." *PROGRESSIVE: Journal of Law* 15, no. 1 (2021): 77–91.

Soetrisno, S. *Medical malpractice and mediation as an alternative to dispute resolution*. New York: Science Fiction, 2010.

Tridiatno, Yoachim Agus. *Restorative Justice*. Yogyakarta: Cahaya Atma Pustaka, 2015.

Wiryawan, I wayan, I ketut artadi, and made soul atmaja. *Out-of-Court Dispute Resolution*. Bali: Udayana University Press, 2010.

Zulfa, Eva Achjani. "Restorative Justice in Indonesia (Study on the Possibility of Applying Restorative Justice Approaches in Criminal Law Enforcement Practice)." *University of Indonesia*, 2009, 3–4.