

Criminal liability for public officials who abuse authority in Indonesian corruption law: distinguishing between administrative violations and criminal offenses

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ABSTRACT

Abuse of authority by public officials is a criminal act that significantly undermines public trust and the integrity of government administration. This article analyzes the concept of criminal liability for officials who abuse their authority based on Indonesian criminal law, particularly under the Anti-Corruption Law and administrative law doctrines. This research employs a normative legal method using statutory, case law, and conceptual approaches. The findings show that criminal liability arises when the elements of unlawfulness, misuse of official authority, and intent to benefit oneself or another party are fulfilled. Furthermore, harmonization between administrative and criminal aspects is needed to prevent overlapping enforcement. This study recommends strengthening internal supervision and enhancing the integrity of public officials.

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1. INTRODUCTION

Abuse of authority by public officials is a persistent challenge in Indonesian government administration that has yet to be fully resolved. This practice undermines the quality of public services, causes significant losses to state finances, erodes public trust, and impedes the realization of good governance principles. In the Indonesian legal context, abuse of authority frequently serves as the foundation for corruption offenses, particularly when officials misuse the authority granted by laws and regulations for personal, group, or sectoral interests. The complexity of this issue requires not only clear legal norms but also effective accountability mechanisms and clarity in distinguishing between administrative violations and criminal offenses.

Extensive research has examined corruption and abuse of authority in the Indonesian public sector. Studies by Mahmud (2022) and Siregar (2021) have comprehensively analyzed the relationship between abuse of authority and criminal liability under Indonesia's Anti-Corruption Law. Additionally, Hapsari et al. (2024) provided a multidisciplinary perspective examining both administrative law and criminal law frameworks. Asshiddiqie (2020) and Fachruddin (2019) contributed significant theoretical foundations regarding the concept of state administration and governmental discretion in a rule-of-law state. Furthermore, Hutabarat (2023) and Prayitno (2022) explored the implications of abuse of authority for criminal liability in corruption cases.

However, previous research contains notable limitations. First, while existing studies have analyzed the elements of criminal liability, they have not comprehensively examined the practical application of court decisions in distinguishing between administrative errors and criminal offenses. Second, most research focuses on theoretical frameworks without providing systematic analysis of how Indonesian courts have interpreted the boundary between administrative violations and criminal conduct. Third, there remains limited analysis regarding the criteria and reasoning used by courts in determining when an official's action constitutes a criminal offense rather than merely an administrative mistake. Fourth, the interplay between Law No. 30 of 2014 on Government Administration and Law No. 31 of 1999 on Corruption has not been thoroughly examined through actual case analysis.

This study aims to fill these gaps by: (1) conducting a comprehensive analysis of court decisions to understand how judges distinguish between administrative violations and criminal offenses in cases of abuse of authority; (2) identifying and analyzing specific criteria used by courts in determining criminal liability; (3) examining how legal principles and doctrines are applied in practice; and (4) providing practical guidance for law enforcement, administrators, and practitioners regarding the boundaries of criminal accountability.

Indonesia's positive legal framework theoretically provides a strong foundation for preventing abuse of authority. Law No. 31 of 1999, as amended by Law No. 20 of 2001, on the Eradication of Corruption, explicitly establishes that government officials who abuse their authority and cause state losses are subject to criminal prosecution. Law No. 30 of 2014 on Government Administration further sets clear boundaries on official actions, distinguishing between actions that exceed authority, blur authority boundaries, or constitute arbitrary exercise of power. These provisions establish that abuse of authority is not merely a matter of bureaucratic ethics but constitutes a potentially criminal offense with severe consequences.

In practice, however, law enforcement against officials suspected of abusing authority faces significant conceptual and technical challenges. Debates frequently arise regarding the distinction between administrative violations and criminal offenses, particularly when an official's decision or action is deemed erroneous but does not necessarily demonstrate *mens rea* or definite harm to the state. This lack of clarity has led to inconsistent law enforcement, created opportunities for prosecutorial overreach, and raised concerns about the "criminalization of policy" (policy criminalization) a phenomenon where administrative discretion is inappropriately transformed into criminal conduct.

This research is designed to provide a comprehensive analysis of how criminal liability applies to public officials who abuse their authority in the Indonesian legal system, with particular emphasis on distinguishing legitimate administrative discretion from criminal conduct. The study aims to: (1) elucidate the theories of criminal liability applicable to public officials within the Indonesian context; (2) analyze how Indonesian courts distinguish between administrative errors and criminal offenses; (3) identify and interpret the legal parameters and judicial reasoning used to determine whether an official's actions warrant criminal liability; and (4) provide evidence-based recommendations for strengthening law enforcement while preventing inappropriate criminalization of administrative discretion. This research is expected to contribute to academic discourse on administrative and criminal law in Indonesia while providing practical guidance to support more consistent law enforcement, prevent policy criminalization, and promote greater integrity in government administration.

2. METHOD

This study employs a normative legal research methodology with emphasis on analyzing positive legal norms and their practical application through court decisions. The research integrates multiple legal research approaches: (1) statutory approach; (2) conceptual approach; (3) comparative approach; and (4) case approach, with particular emphasis on systematic legal interpretation and prescriptive analysis.

Primary Legal Sources: These include: (a) Indonesian legislation, specifically Law No. 31 of 1999 as amended by Law No. 20 of 2001 on the Eradication of Corruption; Law No. 30 of 2014 on Government Administration; the Indonesian Criminal Code (KUHP); and relevant administrative regulations; (b) Reported court decisions from the Supreme Court and Courts of Appeal involving

public officials charged with abuse of authority and corruption offenses (2015-2024); (c) Constitutional Court decisions and judicial reviews related to administrative authority and criminal liability of officials.

Secondary Legal Sources: These include: (a) Legal scholarship and academic articles published in peer-reviewed legal journals (such as *Ius Quia Iustum*, *RechtsVinding*, *Journal of Law & Development*, *Journal of the Constitution*); (b) Books and treatises on criminal law, administrative law, and corruption; (c) Reports from anti-corruption agencies and administrative oversight bodies; (d) Legal analyses and commentaries on Indonesian law. **Tertiary Legal Sources:** These include: (a) Legal dictionaries and encyclopedias; (b) Legal research databases and indices; (c) Government publications and policy documents explaining the legislative intent of relevant laws.

The study analyzes court decisions based on the following selection criteria: (1) Cases involve allegations of abuse of authority by public officials; (2) Cases explicitly address the distinction between administrative violations and criminal conduct; (3) Cases were decided between 2013 and 2024 to reflect current judicial interpretation; (4) Decisions include detailed reasoning and analysis of the elements of criminal liability; (5) Cases represent diverse sectors of public administration and various types of abuse of authority.

Key cases analyzed include: Supreme Court Decision No. 508 K/Pid.Sus/2014 (involving abuse of licensing authority), Supreme Court Decision No. 1469 K/Pid.Sus/2013 (addressing prosecutorial discretion in abuse of authority cases), and appellate decisions examining the *mens rea* element in official misconduct. These cases are analyzed not merely for their factual circumstances but for the judicial reasoning employed in distinguishing criminal abuse of authority from administrative error.

The research employs the following methods of legal analysis:

1. **Statutory Interpretation (Interpretasi Perundang-undangan):** Analysis of the language, structure, and systematic relationships between relevant legal provisions, particularly examining how "abuse of authority" is defined and limited in the Anti-Corruption Law versus the Government Administration Law.
2. **Systematic Interpretation (Interpretasi Sistematis):** Examination of how provisions concerning official liability interact with and relate to other provisions in the legal system, including administrative law principles, constitutional provisions on the rule of law, and criminal law doctrines.
3. **Prescriptive Legal Analysis:** Assessment of what the law should be by examining whether current legal frameworks effectively distinguish between administrative discretion and criminal conduct, and identification of legal gaps and inconsistencies.
4. **Doctrinal Analysis:** Systematic examination of legal principles and theoretical frameworks regarding criminal liability, administrative law doctrines concerning official discretion, and rule-of-law principles that underpin the distinction between legitimate authority and abuse of authority.

The collected primary and secondary sources are analyzed qualitatively through: (1) textual analysis of statutory provisions to identify definitional elements and boundaries; (2) thematic analysis of court decisions to identify patterns in judicial reasoning regarding criminal versus administrative liability; (3) conceptual analysis to clarify and systematize legal principles; (4) synthesis of findings to develop a comprehensive framework for distinguishing criminal abuse of authority from administrative error.

The substantive analysis of selected court decisions is presented in the Results and Discussion section, wherein the judicial reasoning, application of legal principles, and conclusions regarding criminal liability are examined to illustrate how courts operationalize the theoretical frameworks and statutory provisions.

2.1 The Theory of Criminal Liability for Public Officials: Abbreviated Framework

In the Indonesian legal system, criminal liability for public officials who abuse authority rests on three fundamental elements: (1) an unlawful act (*handeling*); (2) the capacity to be held responsible (*toerekeningsvatbaarheid*); and (3) *mens rea*, indicating either intent (*dolus*) or negligence (*culpa*). When public officials exercise authority beyond its prescribed scope, contradict the purpose for which it was granted, or act arbitrarily, such conduct may trigger criminal liability. The distinction between administrative error and criminal abuse depends critically on the presence of *mens rea* and the extent of harm caused to the state.

Judicial Analysis of Court Decisions: Patterns and Criteria for Distinguishing Administrative Violations from Criminal Offenses

To understand how Indonesian courts operationalize these principles, this study examined two landmark Supreme Court decisions that establish clear criteria for distinguishing administrative violations from criminal offenses in cases involving public officials.

2.2 Supreme Court Decision No. 508 K/Pid.Sus/2014: Case Facts and Judicial Reasoning

Factual Background: A local government official in a licensing authority issued a business license in violation of procedural requirements established by administrative regulations. The official failed to verify that the applicant met specific substantive criteria before granting the license. The government subsequently suffered financial losses when it was discovered that the licensee failed to meet statutory requirements and could not perform the licensed activities.

Official's Authority and the Violation: The official possessed clear authority to issue business licenses within defined parameters. The regulations explicitly required verification of specific conditions before issuance. The violation consisted of departing from this mandatory procedure the official issued the license knowing the applicant had not satisfied all requirements.

Judicial Considerations and Reasoning: The Supreme Court examined whether the procedural violation alone constituted a criminal offense of abuse of authority under the Anti-Corruption Law. The Court's analysis focused on four critical elements:

1. First, whether the official possessed awareness of the procedural requirement. Evidence showed the official had received training and guidance on licensing procedures.
2. Second, whether the official deliberately departed from the procedure. The official admitted consciously circumventing verification procedures.
3. Third, whether the departure was intended to benefit a particular party. The Court found evidence that the official received financial benefits from the licensee in exchange for expedited processing.
4. Fourth, whether demonstrable harm occurred to the state. The Court determined that improper licensing created contingent liability for the state and disrupted fair competition in the licensed sector.

The Court's Holding: The Supreme Court held that mere procedural error even a significant one does not automatically constitute criminal abuse of authority. Rather, the Court required proof that: (1) the official was aware of the procedural requirement; (2) the official deliberately departed from the procedure; (3) the departure was intended to benefit a particular party; and (4) the action caused demonstrable harm. By applying systematic interpretation, the Court reconciled the administrative requirement of procedural compliance (under Law No. 30 of 2014 on Government Administration) with the criminal law requirement of *mens rea* (under Law No. 31 of 1999 on Corruption). This decision significantly narrows the scope of criminal abuse of authority by requiring proof of intent beyond mere violation of procedure, thereby protecting officials acting in good faith while maintaining accountability for deliberate misconduct.

Supreme Court Decision No. 1469 K/Pid.Sus/2013: Case Facts and Judicial Reasoning

Factual Background: A prosecutor's office official was accused of abusing authority by arbitrarily refusing to pursue certain criminal cases, allegedly for improper political reasons. The accusation suggested the official exercised prosecutorial discretion in a manner that benefited particular individuals or political factions at the expense of justice.

Official's Authority and the Discretion: Prosecutorial discretion—the authority to determine which cases to investigate and prosecute is recognized both in administrative law and criminal procedure law. This discretion operates within legal boundaries: prosecutors may not arbitrarily refuse to prosecute cases meeting statutory criteria, nor may they pursue cases that lack sufficient evidence or legal foundation. The official in this case possessed legitimate discretion to prioritize cases and allocate limited prosecutorial resources.

Judicial Considerations and Reasoning: The Supreme Court examined the boundaries of prosecutorial discretion under administrative law principles, particularly the concept of "diskresi" (administrative discretion). The Court established that officials possess legitimate discretion within defined parameters, and mere fact that discretion is exercised differently than others might prefer does not constitute criminal abuse. Rather, criminal liability requires proof of:

First, action clearly exceeding the legal boundaries of authority. Prosecutors possess statutory authority to decline prosecution if evidence is insufficient or if statutory conditions are not satisfied.

Merely exercising this authority differently from another prosecutor's approach does not exceed authority boundaries.

Second, action taken for an improper purpose. If prosecutorial decisions are made for reasons wholly unrelated to law enforcement such as personal enrichment, political favoritism, or revenge the action may constitute abuse of discretion. The Court required clear evidence of improper motive, not mere suspicion or disagreement with the exercise of discretion.

Third, gross negligence demonstrating reckless disregard for public duty. Negligent exercise of prosecutorial discretion requires more than simple error in judgment; it requires conduct so careless that it demonstrates abandonment of professional responsibility.

The Court's Holding: The Court held that officials acting within their legally-defined discretionary authority should not face criminal prosecution merely because discretion is exercised in a manner deemed inappropriate by critics. This decision reflects the rule-of-law principle that officials require sufficient legal space to perform their functions without excessive fear of criminal prosecution for good-faith exercises of discretion. The decision protects administrative flexibility while requiring clear evidence of improper purpose or gross negligence before concluding criminal liability exists.

Comparative Analysis: Patterns and Distinguishing Criteria Identified by Courts

Analysis of these two landmark decisions reveals consistent judicial patterns in distinguishing administrative violations from criminal offenses. Five specific criteria emerge from comparative analysis of the rulings:

1. Criterion 1 Presence of Mens Rea: Both decisions emphasize that criminal liability requires proof of intent or gross negligence, not mere procedural error. In Decision 508 K/Pid.Sus/2014, the Court required evidence that the official deliberately departed from procedure for personal benefit. In Decision 1469 K/Pid.Sus/2013, the Court required proof of improper motive, not mere disagreement with the exercise of discretion. This criterion distinguishes administrative violations (which may result from simple error) from criminal offenses (which require culpable mental state).
2. Criterion 2 Demonstrable Harm to State or Public: Both decisions examine whether the official's action caused concrete harm—financial loss, disruption of fair competition, or interference with legitimate law enforcement. Potential or theoretical harm is insufficient; courts require actual, quantifiable harm to trigger criminal liability. Administrative errors that cause no demonstrable harm are unlikely to warrant criminal prosecution.
3. Criterion 3 Violation of Clear Legal Boundaries: Administrative discretion operates within defined parameters. In Decision 508 K/Pid.Sus/2014, clear procedures governed licensing decisions. In Decision 1469 K/Pid.Sus/2013, statutory criteria defined prosecutorial authority. Criminal liability attaches when an official acts clearly outside these boundaries, not when discretion is exercised within legal parameters but in a manner others might question.
4. Criterion 4 Abuse vs. Mere Exercise of Discretion: Both decisions recognize that legitimate administrative discretion—even when exercised in ways that seem subjective or contestable—differs fundamentally from abuse of authority. Officials must possess sufficient discretionary space to perform their functions. Courts distinguish between: (a) discretionary decisions that, though questioned, remain within authority boundaries; and (b) actions that exceed or contravene the purpose for which authority was granted.
5. Criterion 5 Relationship Between the Act and Official Position: Both decisions apply the principle that criminal liability attaches only when the unlawful act directly relates to the official's authority and could not have been committed without occupying that position. This principle prevents the criminalization of ordinary crimes unrelated to official function.

2.3 Application to the Government Administration Law and Anti-Corruption Law

Indonesian legal framework—particularly Law No. 30 of 2014 on Government Administration and Law No. 31 of 1999 on Corruption—establishes these same principles. Law No. 30 of 2014 Article 17 defines abuse of authority as: "(1) exceeding authority; (2) mixing authority; (3) stopping or not using authority; (4) abuse of discretion." Critically, the law establishes that not every violation of administrative procedure constitutes abuse; rather, the violation must meet specific criteria related to the purpose and scope of authority.

Law No. 31 of 1999 Article 3 establishes that any government official who enriches themselves or others through abuse of authority and causes state losses is subject to criminal

prosecution. However, the law does not criminalize every administrative error; criminal liability requires that the abuse cause demonstrable harm and demonstrate mens rea. The Supreme Court decisions analyzed above operationalize these statutory provisions by requiring: (1) proof of deliberate departure from legal boundaries; (2) evidence of improper purpose or gross negligence; (3) concrete harm to the state; and (4) nexus between the abuse and the official's position.

2.4 Research Findings: Specific Criteria for Criminal Liability

This analysis of judicial reasoning identifies specific, concrete criteria that distinguish administrative violations from criminal offenses in Indonesian law:

1. **Procedural Violations Without Culpable Intent:** A procedural error committed without awareness of requirements, or resulting from mistaken understanding of applicable law, is typically treated as an administrative violation subject to internal disciplinary action, not criminal prosecution. In contrast, deliberate circumvention of known procedures with intent to benefit particular parties constitutes criminal abuse.
2. **Abuse of Discretion:** Discretionary decisions exercised within legal boundaries remain within the administrative law sphere, even if others would have decided differently. Criminal liability requires proof that discretion was exercised for an improper purpose wholly unrelated to the authority's lawful objectives.
3. **Quantum and Character of Harm:** Administrative errors causing minimal or theoretical harm typically do not warrant criminal prosecution. Criminal abuse requires harm that is demonstrable, quantifiable, and significant enough to warrant state intervention through the criminal law system.
4. **Structural Safeguards:** When administrative procedures and hierarchical oversight failed to prevent the official's conduct, this factor may indicate abuse sufficiently serious to warrant criminal liability. Conversely, when administrative safeguards functioned and internal discipline addressed the violation, criminal prosecution may be unnecessary.
5. These findings demonstrate that Indonesian courts apply a principled, nuanced approach to criminal liability that protects both legitimate administrative function and public accountability. Criminal law serves as an instrument of last resort (*ultimum remedium*) for addressing the most serious official misconduct, not as a mechanism for prosecuting every administrative error.

3. RESULTS AND DISCUSSION

Based on analysis of key Indonesian Supreme Court decisions and systematic examination of legal provisions, this study identifies specific judicial criteria that distinguish criminal abuse of authority from administrative violations in Indonesian law.

3.1 Key Findings on Distinguishing Criteria

The research identifies five concrete criteria that Indonesian courts apply to distinguish administrative violations from criminal offenses: First, **Presence of Culpable Mental State.** Criminal liability requires proof of mens rea—either deliberate intent (*dolus*) to violate legal boundaries or gross negligence (*culpa*) demonstrating reckless disregard for duty. Mere procedural error or mistaken judgment does not constitute criminal abuse if the official acted in good faith without knowledge of requirements or despite reasonable efforts to comply. Decision 508 K/Pid.Sus/2014 exemplifies this principle: the court held that the official's conscious circumvention of verification procedures with intent to receive personal benefits transformed an administrative violation into criminal abuse.

Second, **Demonstrable Harm to State or Public Interest.** Administrative errors that cause no concrete harm are properly addressed through administrative discipline, not criminal prosecution. Criminal liability attaches when the official's action causes actual, quantifiable harm—financial loss, disruption of fair competition, interference with legitimate government functions, or erosion of public trust. Both landmark decisions examined emphasize this distinction.

Third, **Clear Violation of Legal Authority Boundaries.** Legitimate administrative discretion operates within defined legal parameters. Officials may exercise discretion in ways that reasonable persons might question, yet remain within authority boundaries. Criminal abuse requires proof that the official acted clearly beyond prescribed authority limits or violated the purpose for which authority was granted. Decision 1469 K/Pid.Sus/2013 illustrates this criterion: mere disagreement

with how prosecutorial discretion was exercised does not constitute criminal abuse if the prosecutor acted within statutory authority.

Fourth, Relationship Between Abuse and Official Position. The unlawful act must directly relate to and depend upon the official's position; it could not have been committed by a private citizen lacking that authority. This principle prevents the criminalization of ordinary crimes that happen to be committed by officials.

Fifth, Exhaustion of Administrative Remedies. When administrative procedures and internal oversight mechanisms are adequate to address misconduct, criminal prosecution may be unnecessary. However, when administrative safeguards prove inadequate and the official's conduct causes serious harm despite internal review, criminal liability becomes appropriate.

Implications for Rule of Law and Good Governance

These judicial criteria operationalize provisions of Law No. 30 of 2014 on Government Administration and Law No. 31 of 1999 on Corruption in a manner that balances two critical objectives: protecting the state and public interest from serious official misconduct, while preserving officials' ability to exercise authority and discretion without excessive fear of unjustified criminal prosecution.

The distinction between administrative violations and criminal offenses reflects the principle of *ultimum remedium*—criminal law as a last resort—and the rule-of-law principle that power must be exercised within defined legal boundaries. When officials understand these criteria, they can exercise their authority with confidence that good-faith decisions within legal boundaries will not be criminalized, while clear violations for improper purposes will be addressed through proportionate criminal sanctions.

Institutions responsible for law enforcement should employ these judicial criteria when evaluating whether official conduct warrants criminal prosecution. Investigators and prosecutors should assess: (1) whether clear evidence of *mens rea* exists; (2) whether demonstrable harm to the state occurred; (3) whether the official's actions clearly violated legal authority boundaries; (4) whether the conduct relates directly to official position; and (5) whether administrative remedies proved inadequate. Legal training for public officials should emphasize these criteria so officials understand the practical boundaries of criminal liability and the legal protection afforded to good-faith exercise of discretion.

4. CONCLUSION

This research demonstrates that Indonesian courts apply principled, nuanced judicial reasoning when distinguishing administrative violations from criminal abuse of authority. Rather than criminalizing every procedural error or questionable exercise of discretion, courts require clear proof of *mens rea*, demonstrable harm, and violation of defined authority boundaries. These criteria, drawn from landmark Supreme Court decisions and grounded in statutory provisions, provide concrete guidance for law enforcement, administrators, and practitioners. By applying these criteria consistently, Indonesia can strengthen accountability for serious official misconduct while protecting legitimate administrative function thereby advancing both the rule of law and the quality of government administration.

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REFERENCES

Court Decisions

Supreme Court of the Republic of Indonesia. Decision No. 508 K/Pid.Sus/2014 concerning abuse of authority in licensing. Jakarta: Supreme Court Publishing.

Supreme Court of the Republic of Indonesia. Decision No. 1469 K/Pid.Sus/2013 concerning abuse of prosecutorial discretion. Jakarta: Supreme Court Publishing.

Supreme Court of the Republic of Indonesia. Decision No. 1083 K/Pid.Sus/2016 concerning the distinction

between administrative error and criminal abuse of authority in land administration.

Constitutional Court of the Republic of Indonesia. Constitutional Court Decision No. 6/PUU-IV/2006 concerning the interpretation of "abuse of authority" under the Anti-Corruption Law.

High Court of West Java. Court of Appeal Decision No. 221/PID.SUS/2015/PT.BDG concerning abuse of authority in fiscal administration.

Legislation

Law No. 30 of 2014 on Government Administration.

Law No. 31 of 1999 as amended by Law No. 20 of 2001 on the Eradication of Corruption.

Journal

Hapsari, A. F., Taqwa, N. S., & Gusthomi, M. I. (2024). Analysis of the abuse of authority by public officials from the perspectives of administrative law and criminal acts of corruption. *Journal of Integrated Multidisciplinary Research*, 8(12), 8–16

Mahmud, A. (2022). Abuse of authority in administrative law and its implications for criminal acts of corruption. *Journal of Law and Development*, 52(1), 45–60.

Siregar, F. (2021). Criminal liability of public officials in corruption offenses. *RechtsVinding Journal*, 10(2), 213–228.

Audia, S. (2025). The Meaning of Abuse of Authority in Corruption Cases. *Action: Journal of Law and Justice*, 1(1), 1–12. <https://doi.org/10.30872/action.v1i1.1665>

Suhariyanto, I. (2021). The principle of due diligence in the criminal liability of public officials. *Journal of Law & Development*, 51(2), 211–230.

Wahyudi, B. (2023). The relationship between discretion, abuse of authority, and criminal liability. *Journal of State Law*, 5(3), 455–472.

Andi, M. M. (2021). Abuse of authority and the limits of public officials' discretion from an administrative law perspective. *Indonesian Legislation Journal*, 18(4), 459–472.

Asshiddiqie, J. (2020). The Concept of State Administrators and Its Implications for Corruption Offenses. *Journal of the Constitution*, 17(1), 123–145.

Fachruddin, F. (2019). Governmental discretion and its oversight mechanisms in a rule-of-law state. *Ius Quia Iustum Law Journal*, 26(2), 250–266.

Hutabarat, R. (2023). Abuse of authority from the perspective of administrative law and its implications for criminal law. *Journal of Legal Reform*, 9(1), 17–30.

Prayitno, A. (2022). The relationship between official authority and criminal liability in corruption cases. *Journal of Integrity*, 8(2), 101–118.

Simanjuntak, F. (2021). Official Crimes and the Scope of Criminal Liability for Public Officials. *Journal of Law & Judiciary*, 10(3), 501–520.

Nurdin, A. (2024). Reconstructing the Concept of Abuse of Authority in Corruption Offenses Following the Enactment of the Government Administration Act. *Progressive Law Journal*, 12(1), 45–60..