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The Dilemma of Criminal Responsibility: A Juridical Study of Offenders with Mental Disorders

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Abstrak

Penelitian ini menganalisis pertanggungjawaban pidana bagi pelaku tindak pidana dengan gangguan jiwa dalam sistem hukum Indonesia. Melalui pendekatan yuridis normatif, penelitian ini menelaah regulasi yang mengatur aspek hukum dan kesehatan mental dalam peradilan pidana. Hasil penelitian menunjukkan bahwa meskipun hukum telah mengatur mekanisme pertanggungjawaban bagi individu dengan gangguan jiwa, implementasinya masih menghadapi berbagai kendala, seperti keterbatasan asesmen medis dan fasilitas rehabilitasi. Penelitian ini merekomendasikan peningkatan akurasi diagnosis psikologis, pelatihan aparat hukum, serta penerapan pendekatan rehabilitatif dan *restorative justice* guna menyeimbangkan antara perlindungan masyarakat dan hak individu dengan gangguan mental terkait sistem hukum lebih responsif terhadap kebutuhan kasus serupa di masa depan.

Kata Kunci: *Pertanggungjawaban Pidana, Gangguan Jiwa, Sistem Hukum, Rehabilitasi, Asesmen Psikologis, Restorative Justice, Reformasi Hukum.*

Abstract

This research analyzes the criminal liability of criminals with mental disorders in the Indonesian legal system. Through a normative juridical approach, this research examines the regulations governing the legal and mental health aspects of criminal justice. The results show that although the law has regulated the accountability mechanism for individuals with mental disorders, its implementation still faces various obstacles, such as limited medical assessments and rehabilitation facilities. This study recommends improving the accuracy of psychological diagnosis, training of legal officers, and the application of rehabilitative and restorative justice approaches to balance the protection of society and the rights of individuals with mental disorders so that the legal system is more responsive to the needs of similar cases in the future.

Keyword: Criminal Liability, Mental Disorders, Legal System, Rehabilitation, Psychological Assessment, Restorative Justice, Legal Reform.

INTRODUCTION

A crime is an act that is prohibited by law and is followed by a criminal threat for the perpetrator. Every individual who violates the rule of law will be subject to sanctions in accordance with the applicable provisions. However, in some cases, not all perpetrators of criminal acts can be held legally responsible. One of the conditions that raises debate is when the perpetrator experiences mental disorders when committing a criminal offense. This creates a dilemma in the legal system due to the offender's unconsciousness of his actions.

People who experience mental disorders do not have full control over their behavior and actions. When someone is mentally disordered, they lose the ability to think rationally and distinguish what is right or wrong. Their behavior often deviates from social norms due to their unstable mental state. In some cases, individuals with mental disorders can commit acts that harm others without malicious intent. This poses a challenge for the criminal justice system in determining whether they can be held responsible for their actions.

Mentally disordered offenders often do not realize the consequences of their actions. Their inability to control themselves makes their actions not the result of full awareness. Several incidents have shown that mentally disordered offenders can commit physical violence, theft, and murder. However, in many cases, they do not understand the impact of their actions on victims and society. Therefore, the law must be able to distinguish between acts committed with awareness and those committed due to mental disorders.

In criminal law, the element of consciousness is a major factor in determining a

person's responsibility for a crime. If a person is proven not to have full awareness when committing a crime, then he cannot be sanctioned as a mentally healthy offender. This condition has led to debates among academics and legal practitioners regarding the treatment that should be given to mentally disordered offenders. On the one hand, they are considered unable to be held accountable, but on the other hand, their actions still harm society. Therefore, the legal system needs to have a clear mechanism in handling cases like this.

In many cases, individuals with mental disorders exhibit uncontrollable behavior that can harm others. Their unstable mental state makes them impulsive and difficult to distinguish between reality and hallucinations. Some of them experience delusions that cause them to act out of consciousness. This is the reason why many mentally disordered offenders cannot be subjected to direct criminal punishment. Therefore, a more comprehensive approach is needed in handling these cases so as not to violate human rights while still providing protection to the community.

When a person with mental illness commits a criminal offense, the legal problem that arises is how to impose a fair sanction (Andrian & Ratnawati, 2023). Imposing criminal punishment on someone who does not have full consciousness is against the principle of justice. However, leaving them without intervention can also harm society. Therefore, there is a need for policies that consider legal, mental health, and social protection aspects. An approach that only focuses on punishment without considering medical aspects will cause injustice to mentally disordered individuals.

One of the cases committed by individuals with mental illness in Indonesia occurred in 2023, where a young man with mental illness committed murder in Central Park Jakarta apartment and was sentenced to 16 years imprisonment. The young man had a history of paranoid schizophrenia, which causes delusions and hallucinations that interfere with his assessment of reality.

Law enforcement against criminals with mental illness must consider various factors, including the severity of the disorder. In the justice system, psychological assessments are often used to determine whether offenders can be held responsible for their actions. However, this process is not always optimized due to limitations in the legal system and a lack of understanding about mental illness. Many cases show that individuals with mental disorders receive legal treatment that is inappropriate for their condition. This emphasizes the need for legal policies that are more adaptive to the mental conditions of criminal offenders (Pangestu et al., 2022).

The stigma surrounding mental illness and its association with crime often worsens people's understanding of mental health issues. Many people tend to assume that individuals with mental illness are more likely to commit crimes or violent behavior (Purnama et al., 2016). In fact, most people with mental illness are not dangerous and are more often victims of discrimination or violence (Asti et al., 2016).

People who experience mental disorders often have limitations in interacting with their environment. They experience obstacles in social life, and face stigma from society. When they commit a crime, society often emphasizes punishment rather than recovery of their mental state. This makes it difficult for individuals with mental disorders who have been involved in criminal offenses to receive adequate rehabilitation. In fact, without proper rehabilitation, they risk repeating the same actions in the future.

The legal system also has challenges in distinguishing between individuals with mental disorders who are truly unconscious and those who feign mental illness to avoid punishment. Some offenders try to take advantage of legal loopholes by pretending to be mentally disordered in order to escape criminal sanctions. This phenomenon shows that a strict mechanism is needed to assess the mental state of criminals. Therefore, in-depth and independent psychological examinations should be part of the criminal justice system.

Based on the problems that have been described, this research aims to analyze how the legal system handles mentally disordered offenders. It will also explore the effectiveness of legal policies in distinguishing between offenders who are truly mentally disordered and those who are pretenders. In addition, this study aims to identify challenges and solutions in the law enforcement process against mentally disordered offenders. By understanding the legal and psychological aspects involved, it is hoped that this research can provide recommendations for the justice system in dealing with similar cases in the future.

RESEARCH METHODS

This research uses a qualitative approach with a normative juridical method to analyze how the legal system handles criminals who experience mental disorders. The normative juridical approach is used to examine the rules of law governing criminal liability for offenders with mental disorders. The main focus of this research is to analyze the applicable legal regulations, explore the effectiveness of legal policies in distinguishing between mentally disordered and pretend offenders, and identify challenges and solutions in the law enforcement process against mentally disordered offenders.

The source of data in this study comes from secondary data, which includes legislation, legal doctrine, court decisions, scientific journals, and literature related to the legal and psychological aspects of criminal offenses committed by individuals with mental disorders. The laws that are the main basis for this study include the Criminal Code (KUHP), Law Number 8 of 1981 concerning Criminal Procedure (KUHAP), and Law Number 18 of 2014 concerning Mental Health. In addition, legal studies were also conducted on other relevant regulations governing mental health aspects in the criminal justice system, both at the national level and from an international perspective.

The analysis in this study is conducted by examining the legal rules governing criminal liability for offenders with mental disorders, as well as judicial practices in handling cases involving offenders with unstable mental conditions. The doctrinal approach is used to understand how the law should be applied in this context, while the case approach is used to examine how the law is applied in practice through the study of relevant court decisions. Thus, this research examines legal norms theoretically, and evaluates the effectiveness of their application in the criminal justice system.

The analytical technique used in this research is normative-qualitative analysis, which is carried out by interpreting existing legal norms, analyzing judicial practices, and evaluating the effectiveness of regulations in handling criminal cases involving offenders with mental disorders. This research aims to provide a deeper understanding of the relationship between law and psychology in relation to criminal liability, as well as to provide recommendations for policy makers in improving the legal system to be fair and effective in handling similar cases in the future.

RESULTS AND DISCUSSION

Mental health is the degree of psychological well-being or the absence of mental disorders. Mental health consists of several types of conditions that are generally categorized into 'healthy conditions', 'anxiety disorders', 'stress', and 'depression'. Article 1 Point (3) of Law Number 18 of 2014 concerning Mental Health stipulates that People with Mental Disorders, hereinafter abbreviated as ODGJ, are individuals who experience disturbances with their thoughts, feelings and behavior which are manifested in the form of symptoms and/or meaningful changes in behavior, and can cause suffering and obstacles in carrying out their functions as humans.

According to the American Psychiatric Association (2013), mental disorders are defined as psychological disorders characterized by distortions or alterations in cognitive

processes, emotions, or behavior. Mental disorders include mood disorders (e.g. depression and bipolar), anxiety disorders, schizophrenia, personality disorders, and obsessive-compulsive disorder (OCD). Mental disorders lead to impairment in social, occupational, or other important aspects of a person's life. From a legal perspective, mental disorders are often linked to criminal liability.

The Indonesian legal system has regulated criminal liability for criminals who experience mental disorders. The legal basis relating to criminals who experience mental disorders is regulated in Article 44 Paragraph (1) of the Criminal Code (KUHP), which states that a person who commits a criminal act in a state of incapacity to take responsibility for his actions due to mental disorders cannot be sentenced. This concept is based on the principle that a person can only be held criminally responsible if they have the awareness and ability to understand the consequences of their actions. However, although offenders with mental disorders cannot be charged with a criminal offense, they can still be subject to other legal actions in the form of treatment or rehabilitation in a mental hospital (Pangestu et al., 2022).

Paragraph (2) states that if it is evident that he cannot be held accountable for the act due to lack of sound mind or a change of mind, the judge may order him to be committed to a psychiatric hospital for a maximum of one year for examination. This aims to ensure that the individual does not pose a threat to society in the future. In practice, not all mentally disorders individuals are automatically exempted from legal liability, as an in-depth examination is required to determine their mental state. Therefore, the psychological and psychiatric assessment process is an important factor in determining whether a person can be held accountable for the criminal offense he or she committed.

In Law Number 18 Year 2014 on Mental Health Article 71 paragraph 2 states that for the purpose of law enforcement, a person suspected of ODGJ who commits a criminal offense must receive a mental health examination. Which is then explained in Article 71 Point (2) that the Mental Health examination as referred to in Paragraph (1) is carried out to: 1. Determine the ability of a person or group to take responsibility for a criminal offense they have committed; and 2. Determine a person's legal capacity to undergo the judicial process.

In Indonesian criminal procedure law, the Criminal Procedure Code (KUHP) regulates the procedure for examining defendants suspected of having mental disorders. Article 133 Paragraph (1) of KUHP states that the investigator may request the assistance of a psychiatric expert to examine the psychological condition of a suspect suspected of

having a mental disorder. This examination aims to assess whether the suspect has consciousness when committing a criminal offense and whether he is able to follow the trial. If the results of the examination show that the suspect has a severe mental disorder, then the prosecutor can submit a request to the judge to postpone or stop the judicial process until his mental condition allows him to be tried. In certain cases, the judge also has the authority to order the placement of the defendant in a mental hospital to undergo rehabilitation before further judicial proceedings are carried out. This mechanism is a form of legal protection for individuals with mental disorders so that they are not treated the same as mentally healthy criminals (Andrian & Ratnawati, 2023). However, in practice, the implementation of this procedure still encounters obstacles, such as limited forensic experts and the lack of adequate rehabilitation facilities for offenders with mental disorders.

In addition to the aspects of criminal law and procedural law, the Indonesian government has also regulated rehabilitation policies for offenders with mental disorders through Law Number 18 of 2014 on Mental Health. This law emphasizes that individuals with mental disorders who commit criminal offenses must receive medical treatment at mental health facilities, not just be sentenced to criminal punishment. Article 52 of the Mental Health Law stipulates that individuals with mental disorders who commit unlawful acts must receive treatment at a mental hospital or other rehabilitation institution appointed by the government.

Article 80 of Law Number 18 of 2014 on Mental Health states that the Government and Regional Governments are responsible for taking action for ODGJ who are neglected, vagrants, threatening the safety of themselves and/or others, and/or disturbing public order. Article 81 Paragraph (1) also explains that the Government and Regional Governments are obliged to make rehabilitation efforts for ODGJ who are neglected, vagrants, threatening the safety of themselves and others. Whereas in Paragraph (2) ODGJ who are neglected, vagrants, threatening the safety of themselves and/or others, and/or disturbing public order as referred to in Paragraph (1) include ODGJ: incapable; have no family; guardian or guardian and/or unknown family.

Article 82 of Law Number 18 of 2014 on Mental Health states that the Government and Regional Governments are obliged to provide guardianship in service facilities outside the health sector for ODGJ who have recovered or whose symptoms are under control and who have no family and/or are neglected. It is very clear that the government is responsible for providing legal certainty and legal protection for people with mental

disorders, and the government should carry out these orders. However, what ODGJ gets is bullying, persecution and vigilantism from the local community, because this has not been regulated in strict sanctions because there is no specific law that regulates legal sanctions for offenders of criminal acts against ODGJ.

According to the provisions of Article 3 of Law Number 18 of 2014 concerning Mental Health states that mental health efforts aim to ensure that everyone can enjoy a healthy mental life, free from fear, pressure, and other disorders that can interfere with mental health and provide protection and mental health services for people with mental problems (ODMK) and people with mental disorders (ODGJ) based on human rights. In an effort to protect the entire Indonesian nation as stated in the ideals of the Republic of Indonesia, the government should establish laws related to mental health. This policy aims to ensure that individuals with mental disorders receive appropriate treatment according to their medical conditions and are not simply punished without proper care. However, the implementation of this policy still faces challenges, especially in terms of the availability of adequate rehabilitation facilities in various regions. Many mental hospitals in Indonesia experience limited capacity and resources in handling patients with criminal offender status. Synergy between legal and health institutions is needed to optimize fair treatment for offenders with mental disorders.

Criminal responsibility is an important concept in law. However, the Indonesian Criminal Code (KUHP) does not provide an explicit definition of culpability. Therefore, an understanding of this must be sought in existing legal doctrine (Sagara et al., 2023). To be criminally accountable, a person must meet certain requirements, namely having the ability to be responsible. In simple terms, a person is considered not to have the ability to be held responsible if he does not have the freedom to choose between doing or not doing an act prohibited by law, or if he is in a state that makes him unable to judge that his actions are against the law (Pangestu et al., 2022). Alternative measures such as hospitalization in a mental hospital, community-based rehabilitation, and diversion programs can be solutions in addition to direct criminal punishment.

The KUHP does not explicitly formulate when a person can be considered capable of responsibility, but there are provisions that lead to this. Basically, any criminal offense of murder committed by a person with mental disorder (ODGJ) may be subject to punishment. However, in order to be held accountable for the crime, the perpetrator must have the ability to be responsible as stipulated in Article 44 of the KUHP which states that a person who commits an act for which he cannot be held accountable due to mental

defect or mental disorder cannot be convicted. Although this article does not directly explain what is meant by "incapable of responsibility," it provides reasons related to the personal condition of the offenders, such as biological mental defects. Determining the mental state of the perpetrator at the time of the act is important, and this is usually determined by a psychiatrist.

Article 44 of the KUHP shows two important aspects in determining the ability to be held responsible. First, the determination of the offender's mental state, which must be carried out by a psychiatrist. Second, the causal relationship between the mental state and the act committed, which is determined by the judge. The offender is deemed incapable of responsibility if he or she is mentally defective from infancy or has a mental disorder due to illness, which results in an inability to distinguish between good and bad. There are three methods for determining incapacity for criminal responsibility, namely biological, psychological, and mixed methods, which can be used to analyze the offender's condition in more depth.

Based on Article 44 Paragraph (2) of the KUHP, it is stated that if it is proven as stated in Paragraph (1), the Judge may order the person to a mental hospital on probation for one (1) year. The sanction provision in Article 44 Paragraph (2) of the KUHP is clearly a type of action sanction.

Based on this analysis, it can be concluded that positive law in Indonesia has clearly regulated criminal liability for individuals with mental disorders, both in the KUHP, KUHAP, and the Mental Health Law. However, there are still challenges in implementing these regulations, especially in the aspects of medical assessment, judicial mechanisms, and the availability of rehabilitation facilities. Comparison with other countries shows that rehabilitative approaches are more effective in dealing with individuals with mental disorders who commit criminal offenses compared to imprisonment alone. Therefore, reforms are needed in the criminal justice system in Indonesia to better balance the protection of society and the rights of individuals with mental disorders. The synergy between law enforcement officials and health institutions must continue to be strengthened so that a fairer and more effective legal system can be implemented for offenders with mental disorders.

The effectiveness of legal policies in distinguishing between mentally disordered and feigned offenders is critical to ensuring fairness in the justice system. These policies must be able to accurately identify the mental state of offenders, so as to determine whether they are criminally responsible or not.

In practice, the assessment of the offender's mental state often involves psychiatric experts who are authorized to provide a diagnosis (Andrian & Ratnawati, 2023). However, challenges arise when offenders feign mental disorders to avoid punishment. Therefore, strict and transparent procedures in psychological evaluations are needed to prevent abuse of the system.

Effective legal policies should also include training for law enforcement officers and judges to recognize signs of mental illness and distinguish them from intentional behavior. In this way, justice can be served, and offenders who are truly mentally disordered will not be punished, while those who are pretending can still be held accountable.

Challenges in law enforcement against offenders with mental illness include several complex aspects (Pradea & Arfa, 2024). One of the main challenges is the difficulty in accurate diagnosis. Determining whether an offender is truly mentally disordered or feigning it is often problematic, as an improper diagnosis process can result in incorrect legal decisions. In addition, the social stigma attached to offenders with mental disorders is also a barrier. They often face negative views from society, which can exacerbate the situation and prevent them from getting the necessary treatment (Hariadi et al., 2023).

Lack of understanding among law enforcement and related officials is also a significant challenge. Many of them do not have sufficient knowledge about mental disorders, and thus may not be able to handle cases in an appropriate manner. In addition, limited mental health care facilities also hinder the rehabilitation process for offenders who need help.

Addressing these challenges requires a multidisciplinary approach that integrates various disciplines, such as psychology, law and social science. This approach will help deal with mentally disordered offender cases in a comprehensive manner. In addition, providing specialized training to law enforcement officers and judges on how to recognize and handle offenders with mental disorders is essential. This training should include an understanding of the medical and psychological aspects associated with mental disorders.

The role of forensic psychiatry can be part of the solution to the legal process of mentally ill offenders. In Indonesia, forensic psychiatric evaluations are conducted by psychiatrists trained in the legal field to assess whether a person is truly mentally ill or whether there are indications of a deliberately fabricated mental disorder. The process begins with an in-depth interview, collection of medical history, and a thorough psychological examination. This evaluation is crucial as it can determine whether the accused can be held accountable for their actions or whether they need to receive

treatment in a mental health facility. Forensic psychiatric evaluations help courts to ensure that decisions are just, by distinguishing between individuals who are genuinely mentally ill and those who may be attempting to use mental illness as a defense or manipulation of the legal process.

The application of restorative justice can also be an effective solution. Using this approach, dialogue between the offender, the victim and the community can be facilitated, allowing the offender to understand the impact of their actions and commit to change. Improving public education about mental illness is also crucial to reduce stigma and encourage support for offenders who need treatment.

Finally, inter-institutional coordination is key in ensuring effective treatment of offenders with mental disorders. Cooperation between legal, mental health and social institutions will help create a better system for dealing with these cases, so that justice can be served in a more humane and sustainable way.

CONCLUSION

The conclusion of this study shows that the Indonesian legal system has regulated criminal liability for individuals with mental disorders through various regulations, including the KUHP, KUHPA, and Mental Health Law. However, the implementation of these regulations still faces challenges, especially in the aspects of medical assessment, judicial mechanisms, and the availability of adequate rehabilitation facilities. Analysis shows that a rehabilitative approach is more effective than imprisonment alone, as implemented in several other countries. Therefore, reforms in the criminal justice system are needed so that the law can balance the protection of society and the rights of individuals with mental disorders.

To improve the effectiveness of the legal system in dealing with offenders with mental disorders, several recommendations can be made. First, psychological and psychiatric assessment procedures should be tightened by involving independent experts to ensure the accuracy of the diagnosis. Second, law enforcement officials and judges need to receive special training in recognizing and handling cases involving offenders with mental disorders. Third, rehabilitation facilities for individuals with mental disorders must be expanded and improved to provide treatment that is appropriate to their condition. Fourth, synergies between legal, health and social institutions should be strengthened to optimize fair treatment for offenders with mental disorders. Fifth, a restorative justice approach can be applied as an alternative solution to ensure that offenders understand

the impact of their actions while receiving proper rehabilitation.

REFERENCES

- American Psychiatric Association. (2013). *Diagnostic and Statistical Manual of Mental Disorders Fifth Edition (DSM-5^m)*. American Psychiatric Publishing, England.
- Andrian, W., & Ratnawati, E. (2023). Tanggung Jawab Negara Terhadap Tindak Pidana Orang Dengan Gangguan Jiwa. *Syntax Literate: Jurnal Ilmiah Indonesia*, 8(3), 2022-2036.
- Asti, A. D., Sarifudin, S., & Agustin, I. M. (2016). Public Stigma Terhadap Orang dengan Gangguan Jiwa di Kabupaten Kebumen. *Jurnal Ilmiah Kesehatan Keperawatan*, 12(3), 176-188.
- Bila, K. S. (2022). Perlindungan Hukum Orang dengan Gangguan Jiwa (ODGJ) sebagai Korban Tindak Pidana Penganiayaan dalam Perspektif Viktimologi. *Recidive: Jurnal Hukum Pidana dan Penanggulangan Kejahatan*, 11(1), 92-99.
- Darto, A., Alam, A. S., & Purwaningtyas, F. D. (2023). Pertanggungjawaban Pidana bagi Pelaku Tindak Pidana Pembunuhan Pengidap Gangguan Kejiwaan dalam Prespektif Hukum Pidana. *Jurnal Ilmu Hukum Wijaya Putra*, 1(2), 257-264.
- Hariadi, M. R., Sudjatmiko, S., & Naimah, N. (2023). Pembuktian Orang dengan Gangguan Jiwa (ODGJ) sebagai Alasan Penghapus Pidana. *IUS: Jurnal Ilmiah Fakultas Hukum*, 11(1), 72-82.
- Pangestu, K. J., Sugiarta, I. N. G., & Dinar, I. G. G. P. (2022). Perlindungan Hukum Terhadap Pelaku Tindak Pidana yang Mengalami Gangguan Jiwa. *Jurnal Analogi Hukum*, 4(3), 293-298.
- Pradea, R., & Arfa, N. (2024). Orang dengan Gangguan Jiwa (ODGJ) sebagai Korban Tindak Pidana: Bagaimana Aturan Hukum Pidananya?. *PAMPAS: Journal of Criminal Law*, 5(1), 1-13.
- Pranawa, B., Saputri, A. M. W., & Nurdiyanto, I. (2023). Pertanggungjawaban Pidana Terhadap ODGJ Yang Melakukan Tindak Pidana Penganiayaan yang Menyebabkan Kematian (Studi Kasus di Polsek Sambi Boyolali). *Jurnal Bedah Hukum*, 7(2), 159-169.
- Prihatini, Z. (2024). Pemuda Skizofrenia Divonis 16 Tahun Penjara atas Pembunuhan di Jakarta Barat – Apakah ODGJ Dapat Dipidana?. *Kompas.com*. Retrived from <https://www.bbc.com/indonesia/articles/c2v030n390yo>
- Purnama, G., Yani, D. I., & Sutini, T. (2016). Gambaran Stigma Masyarakat Terhadap Klien Gangguan Jiwa di RW 09 Desa Cileles Sumedang. *Jurnal Pendidikan Keperawatan*

Indonesia, 2(1), 29-37.

Republik Indonesia. (1981). *Undang-undang Nomor 8 Tahun 1981 tentang Hukum Acara Pidana*. Lembaran Negara Republik Indonesia Tahun 1981 Nomor 76. Tambahan Lembaran Negara Nomor 3209. Sekretariat Negara, Jakarta.

Republik Indonesia. (2014). *Undang-undang Nomor 18 Tahun 2014 tentang Kesehatan Jiwa*. Lembaran Negara Republik Indonesia Tahun 2014 Nomor 185. Tambahan Lembaran Negara Nomor 5571. Sekretariat Negara, Jakarta.

Sagara, P. W., Dewi, A. A. S. L., & Suryani, L. P. (2023). Sanksi Pidana Terhadap Pelaku Tindak Pidana yang Mengalami Gangguan Kejiwaan. *Jurnal Konstruksi Hukum*, 4(1), 118-124.