

Criminal Liability of Police Officers for Assault Resulting in Death: The Bripda Mesias Case in Tual City

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Abstract

Purpose: This study analyzes the criminal liability of police officers for assault resulting in death through the 2026 case of Police Brigadier Mesias in Tual City. It examines applicable criminal law provisions, law enforcement mechanisms, and judicial processes, while proposing reforms to strengthen police accountability in Indonesia.

Research Methodology: The study employed a normative-empirical legal approach using statutory, case, conceptual, and comparative analyses. Data were collected through interviews, observations, document reviews, and literature studies, then analyzed using juridical, content, and thematic techniques with triangulation to ensure validity.

Results: The findings show that all elements of Article 351(3) of the Indonesian Criminal Code were fulfilled. Police officers do not enjoy criminal immunity, and the defense of acting in an official capacity was rejected because the use of force violated the principles of necessity and proportionality. The court imposed a five-year prison sentence, considering both aggravating and mitigating factors.

Conclusions: Accountability is hindered by limited independence in internal investigations, corps solidarity, sentencing disparities, and weak witness protection. Public and civil society pressure played a significant role in ensuring accountability. Institutional reforms are needed to strengthen transparency and independent oversight.

Limitations: The study focuses on a single case, limiting broader generalization. Access to internal police documents was restricted.

Contributions: The study advances scholarship on police accountability, provides a framework for dual accountability, and offers practical insights for legal reform and policymaking.

Keywords: *Criminal Liability, Death Assault, Institutional Accountability, Police Officers, Police Reform*

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1. Introduction

The Indonesian National Police (Polri) is a state institution mandated to maintain public security and order, enforce the law, and provide protection and services to society. In carrying out these functions, police officers are granted authority to use force under certain legal conditions ([Bittner, 1970](#)).

However, this authority is not absolute, as it is strictly limited by the principles of legality, necessity, proportionality, and accountability. Violations of these principles may result in criminal liability when the actions of police officers fulfill the elements of a criminal offense under applicable criminal law provisions ([Baker & Nasrudin, 2023](#)).

From a theoretical perspective, criminal liability in law enforcement contexts raises complex issues because police officers occupy a dual position as both state agents and individual legal subjects. Although they are empowered to exercise coercive force, they remain subject to general criminal law norms. Prior legal scholarship emphasizes that criminal liability is personal in nature and cannot be eliminated solely based on institutional status or occupational function ([Oramas, Terrill, & Foster, 2023](#)). Therefore, any excessive or unlawful use of force that exceeds legal boundaries may still constitute a criminal offense.

Empirical studies indicate that the use of force by police officers is a persistent issue in many jurisdictions, including Indonesia. International research has shown that the use of force is often influenced by situational dynamics, organizational culture, and structural weaknesses in accountability systems ([Ba et al., 2021](#); [Hoekstra & Sloan, 2022](#); [Human Rights Watch, 2022](#)). Moreover, systematic reviews of police deadly force literature highlight ongoing challenges in measurement, transparency, and institutional oversight, which continue to hinder effective accountability mechanisms ([Oramas et al., 2023](#); [Weitzer & Tuch, 2006](#)).

In the Indonesian context, police violence frequently occurs in routine interactions that escalate due to weak procedural compliance, insufficient de-escalation training, and psychological pressures in operational settings ([Ba et al., 2021](#); [Engel et al., 2022](#)). These conditions indicate that police use of force is not only a legal issue but also an institutional and organizational problem requiring comprehensive reform ([Crank, 2004](#)). In 2026, a case in Tual City involving a police officer, Bripda Mesias, drew widespread public attention after an alleged assault during a routine patrol resulted in the death of a civilian. The incident raised serious concerns regarding the limits of police authority and the adequacy of existing accountability mechanisms when law enforcement actions result in fatal consequences. The case became particularly significant because it involved the death of a civilian allegedly caused by excessive use of force during an official police operation.

The temporal proximity of this case to the present study constitutes a significant empirical asset. As a legal event that unfolded and reached final judicial resolution within 2026, the Bripda Mesias case provides a contemporaneous empirical window into the current operational conditions of the Indonesian criminal justice system in handling police misconduct. Unlike retrospective case studies that analyze events removed from the present institutional context, this study captures accountability dynamics as they are actively shaped by existing legal frameworks, current institutional configurations, and prevailing enforcement cultures. This contemporaneity strengthens the policy relevance of the findings and their direct applicability to ongoing debates on police reform in Indonesia.

Under Indonesian criminal law, assault resulting in death is regulated under Article 351 paragraph (3) of the Criminal Code (KUHP), which applies universally without exception, including to police officers. However, cases involving law enforcement personnel are legally complex due to the existence of dual accountability mechanisms, namely criminal accountability through the general court system and disciplinary accountability through internal police institutions ([Boateng, Pryce, Dzordzormenyoh, Hsieh, & Cuff, 2024](#)). In practice, the interaction between these two systems often creates tension, overlap, and inconsistencies in enforcement outcomes.

Previous studies reveal that although police officers are legally accountable for criminal acts, enforcement processes are often hindered by institutional solidarity, limited independence of internal investigations, evidentiary constraints, and sentencing disparities ([Hoekstra & Sloan, 2022](#); [Boateng et al., 2024](#)). Furthermore, external oversight institutions such as Kompolnas still face limitations in

terms of investigative authority and enforcement power, which may reduce transparency and weaken public trust in law enforcement institutions ([Kochel & Skogan, 2021](#)).

Comparative legal studies further demonstrate that jurisdictions with independent oversight bodies tend to achieve higher levels of accountability and consistency in handling police misconduct cases ([Baker & Nasrudin, 2023](#)). These findings suggest that the issue of police accountability is not solely normative but deeply institutional, requiring stronger structural mechanisms to ensure impartial enforcement of criminal law. Against this background, the Bripda Mesias case provides a relevant empirical basis for examining how criminal liability is constructed and enforced when police officers are involved in assault resulting in death. The case also reflects broader systemic challenges in balancing law enforcement authority, human rights protection, and institutional accountability.

Therefore, this study aims to analyze the criminal liability of police officers in cases of assault resulting in death, using the Bripda Mesias case in Tual City as a legal illustration. Specifically, the study focuses on three main aspects: (1) the legal framework governing assault resulting in death under Indonesian criminal law, (2) the assessment of criminal responsibility of police officers based on objective and subjective elements of the offense, and (3) the implementation of law enforcement and judicial mechanisms in handling such cases. This study contributes to the development of criminal law scholarship by emphasizing that accountability challenges in police-involved violence are primarily rooted in institutional and structural weaknesses rather than deficiencies in legal norms. It also provides policy implications for strengthening independent oversight mechanisms, improving consistency in criminal adjudication, and enhancing public trust in law enforcement institutions in Indonesia.

2. Literature Review

2.1 Criminal Liability of Police Officers

Criminal liability is a foundational concept in criminal law that requires the simultaneous fulfillment of three core elements: the commission of an unlawful act (*actus reus*), the presence of criminal intent (*mens rea*), and the absence of legally recognized grounds excluding liability. In the context of law enforcement officers, this framework applies without modification, as criminal liability is personal in nature and cannot be eliminated solely on the basis of institutional status or occupational function ([Oramas, Terrill, & Foster, 2023](#)). Police officers occupy a dual legal position as both state agents authorized to exercise coercive force and individual legal subjects fully subject to general criminal law norms. This duality creates a structurally complex accountability terrain in which the lawfulness of an officer's conduct must be assessed against both operational authority and criminal law boundaries ([Baker & Nasrudin, 2023](#)). When the exercise of force exceeds these boundaries, the officer's institutional role does not provide immunity but instead becomes a relevant contextual factor in determining the scope and gravity of criminal responsibility.

Legal doctrine further distinguishes between justification and excuse as grounds for excluding criminal liability. Justification eliminates the unlawfulness of the act itself, such as when force is used in circumstances of genuine necessity and proportionality. Excuse, by contrast, eliminates personal culpability without rendering the act lawful, such as in cases of coercion or severe psychological incapacity. In cases involving police officers, the defense of lawful execution of duty operates as a form of justification and is conditioned on strict compliance with the principles of legality, necessity, and proportionality ([Baker & Nasrudin, 2023](#); [Oramas et al., 2023](#)). The determination of *mens rea* is particularly significant in cases involving fatal outcomes, as it determines whether the offense is classified as assault resulting in death under Article 351 paragraph (3) or as murder under Article 338 of the Indonesian Criminal Code. The distinction rests on whether the perpetrator possessed intent to kill (*animus necandi*) or merely intent to injure (*animus laedendi*), with the former attracting more severe criminal consequences ([Oramas et al., 2023](#)). This doctrinal differentiation is central to the legal analysis of the Bripda Mesias case examined in this study.

2.2 Assault Resulting in Death and Police Use of Force

Assault resulting in death under Article 351 paragraph (3) of the Indonesian Criminal Code (KUHP) is defined as intentional violent conduct aimed at causing injury, where death occurs as an unintended consequence. The key legal distinction between assault resulting in death and murder lies in the element of intent, where murder requires intent to kill, while assault requires only intent to injure ([Oramas, Terrill, & Foster, 2023](#)). This distinction plays a central role in determining criminal qualification in cases involving fatal outcomes.

Empirical studies indicate that excessive use of force by police officers is often not limited to high-risk situations but emerges from routine encounters that escalate due to procedural weaknesses, limited de-escalation training, psychological pressure, and institutional culture factors ([Ba et al., 2021](#); [McLean et al., 2022](#)). These findings suggest that police violence is not solely an individual problem but also reflects broader organizational and systemic conditions within law enforcement institutions.

International human rights standards regulate the use of force through principles of legality, necessity, proportionality, and accountability, which require that force be used only when strictly necessary and proportionate to the threat encountered. However, gaps remain between normative frameworks and practical implementation in policing operations, particularly in ensuring consistent application of operational procedures ([Baker & Nasrudin, 2023](#)). In judicial practice, forensic evidence such as *visum et repertum* plays a crucial role in establishing causal linkage between violent conduct and death ([Oramas et al., 2023](#)). Nevertheless, sentencing outcomes remain inconsistent, particularly in cases involving police officers, where occupational status and institutional context may influence judicial reasoning and contribute to disparities in punishment severity ([Boateng, Pryce, Dzordzormenyoh, Hsieh, & Cuff, 2024](#)). Victimological studies further show that victims frequently experience secondary victimization, including intimidation and limited access to justice mechanisms, which weakens procedural fairness ([Oramas et al., 2023](#)).

2.3 Police Accountability and Institutional Oversight

Police accountability operates through two structurally distinct mechanisms: criminal accountability, which subjects officers to general judicial processes, and administrative accountability, which is managed through internal disciplinary institutions. While these mechanisms are designed to function in a complementary manner, empirical evidence consistently demonstrates that their parallel operation produces fragmented enforcement outcomes, overlapping jurisdictional authority, and institutional inconsistencies that collectively weaken the effectiveness of accountability ([Boateng et al., 2024](#)).

The internal oversight function is primarily carried out by the Professional and Security Affairs Division (Propam), which is responsible for investigating disciplinary violations and recommending sanctions within the police organization. However, Propam's structural position within the same institutional hierarchy as the officers it investigates creates inherent conflicts of interest that constrain its independence and objectivity ([Boateng et al., 2024](#)). Institutional solidarity, hierarchical pressure, and the organizational norm of corps loyalty further reduce the capacity of internal mechanisms to produce impartial assessments of serious misconduct cases ([Kutnjak Ivković et al., 2022](#)).

External oversight is assigned primarily to the National Police Commission (Kopolnas), which performs monitoring, evaluation, and recommendatory functions. However, Kopolnas operates without binding enforcement authority, meaning that its recommendations are not legally compulsory and depend on the willingness of the police institution to comply ([Kochel & Skogan, 2021](#)). This design limitation significantly constrains Kopolnas's capacity to ensure accountability outcomes, particularly in cases where institutional interests conflict with transparency obligations. The absence of public access to disciplinary case outcomes further weakens institutional legitimacy and erodes public trust ([Kochel & Skogan, 2021](#); [Hough et al., 2010](#)).

Comparative institutional studies demonstrate that jurisdictions with independent oversight bodies, characterized by structural separation from the police institution, investigative authority, and legally binding enforcement powers, consistently achieve stronger and more consistent accountability

outcomes ([Hoekstra & Sloan, 2022](#); [Baker & Nasrudin, 2023](#)). These findings indicate that the effectiveness of police oversight is not primarily a function of legal norms but of institutional design, and that meaningful reform requires structural reconfiguration rather than incremental procedural adjustment.

2.4 Conceptual Framework and Study Focus

The enforcement of criminal law involving police officers requires coordination between investigative agencies, prosecutors, and courts. However, the effectiveness of enforcement is often hindered by weak investigations, limited inter-agency coordination, and intimidation of victims and witnesses, which collectively contribute to case attrition and inconsistent prosecution outcomes ([Boateng, Pryce, Dzordzormenyoh, Hsieh, & Cuff, 2024](#)). At the prosecutorial level, institutional proximity between prosecutors and police institutions may affect objectivity in charging decisions, which can result in lighter charges or reduced prosecutorial demands ([Boateng et al., 2024](#)). At the judicial level, sentencing disparities remain a significant issue due to variations in how courts interpret police officer status as either aggravating or mitigating factors ([Boateng et al., 2024](#)). These inconsistencies reflect structural limitations within the criminal justice system in ensuring uniformity and fairness. Overall, these conditions indicate that the criminal justice process in cases involving law enforcement officers still faces challenges in achieving consistency, transparency, and accountability. Strengthening institutional independence and improving coordination across justice institutions is therefore essential.

2.5 Law Enforcement and the Criminal Justice System

Security sector reform is closely linked to public trust in law enforcement institutions, where misconduct cases significantly influence perceptions of legitimacy. Empirical evidence shows that perceptions of police violence are negatively associated with public trust, especially when cases are perceived as lacking transparency and accountability ([Kochel & Skogan, 2021](#); [Tankebe, 2013](#)). Sustainable reform requires structural, cultural, legal, and ethical transformation supported by political commitment and independent oversight mechanisms ([Baker & Nasrudin, 2023](#); [Weisburd et al., 2010](#)). Community policing contributes to improving police-community relations, although its effectiveness is influenced by institutional resistance and limited resources within police organizations ([Kochel & Skogan, 2021](#); [Gill et al., 2014](#)). In addition, media and civil society play an important role in strengthening accountability by increasing transparency and public oversight of law enforcement institutions ([Kochel & Skogan, 2021](#)). Overall, public trust is shaped by the interaction between legal compliance, institutional transparency, and reform effectiveness ([Tyler, 2006](#)).

2.6 Research Gap and Conceptual Focus

Although existing literature has extensively discussed criminal liability, assault resulting in death, institutional accountability, criminal justice enforcement, and police reform, these studies remain fragmented across doctrinal, empirical, and institutional perspectives. Criminal liability studies focus on normative legal principles, assault studies emphasize legal classification and intent, accountability studies concentrate on institutional mechanisms, while reform studies highlight public trust without fully integrating enforcement realities. This fragmentation reveals a significant gap in the literature, namely the absence of an integrated socio-legal framework that connects criminal liability theory, substantive criminal law, institutional accountability, and criminal justice enforcement within a single empirical case analysis. Therefore, this study addresses this gap by examining how criminal liability is constructed and enforced in cases involving fatal police violence through a case-based socio-legal approach.

3. Research Methodology

This study employed a normative-empirical (socio-legal) legal research design that integrates doctrinal legal analysis with empirical field data to examine the criminal liability of police officers in cases involving assault resulting in death ([Creswell & Creswell, 2018](#)). This approach enables the study to connect legal norms with their practical implementation in real enforcement settings, particularly in cases involving police conduct and criminal justice processes. The research adopted statutory, case, conceptual, and comparative approaches. The statutory approach was used to analyze relevant provisions of Indonesian criminal law, particularly Article 351 paragraph (3) of the Criminal

Code (KUHP). The case approach focused on the Bripda Mesias case in Tual City as the primary empirical unit of analysis (Yin, 2018). The conceptual approach was applied to interpret legal doctrines related to criminal liability, mens rea, and police accountability, while the comparative approach was used to situate the findings within broader international perspectives on law enforcement accountability and criminal justice systems.

The study was conducted in Tual City, Maluku Province, as the main field site, and in Jakarta for the collection of institutional-level data from relevant national law enforcement and judicial institutions. The empirical data collection process took place from March to June 2026, and was extended to include the full judicial process until the issuance of the final court decision on 25 June 2026 (Case No. 45/Pid.B/2026/PN Tual). This ensured that the analysis covered the entire trajectory of the case, including investigation, prosecution, trial proceedings, and final judgment.

Data in this study consisted of both primary and secondary sources. Primary data were obtained through semi-structured in-depth interviews, non-participant observation, and documentary evidence. The interviews involved key informants consisting of victims' family members, eyewitnesses, investigators, prosecutors, judges, and legal practitioners or civil society representatives. Documentary sources included police investigation reports (Berita Acara Pemeriksaan/BAP), visum et repertum (VER No. VER/45/III/2026), indictments, prosecutorial demands (requisitoir), defense pleadings (pledoi), and court judgments. Secondary data consisted of statutory regulations, jurisprudence, academic journals, textbooks, and legal reference materials relevant to criminal law and police accountability.

Data collection was carried out using multiple techniques to ensure depth and triangulation. A comprehensive literature review was conducted to gather doctrinal and empirical references from legal databases and academic sources. Semi-structured interviews were conducted with informants to explore factual, procedural, and institutional dimensions of the case, with interview durations ranging from 45 to 90 minutes depending on participant roles. Documentary analysis was conducted through formal access to case-related documents from relevant institutions. In addition, non-participant observation was carried out during court proceedings to capture procedural dynamics and interactions within the judicial process.

Data analysis was conducted using a combination of normative legal analysis and qualitative analytical methods. Normative analysis was performed through grammatical, systematic, teleological, and historical interpretation of legal provisions to understand the legal framework governing criminal liability. Case reconstruction analysis was used to map the chronological development of the Bripda Mesias case based on triangulated data sources. In addition, qualitative data were analyzed using thematic analysis (Braun & Clarke, 2019) to identify recurring patterns and meanings, while qualitative content analysis was applied to legal documents and case files (Krippendorff, 2018; Morgan, 2022). This combination ensured a comprehensive integration of legal and empirical perspectives.

To ensure validity and reliability, the study applied triangulation techniques including source triangulation, methodological triangulation, and theoretical triangulation (Denzin, 2017). Furthermore, the study adopted trustworthiness criteria in qualitative research as proposed by Lincoln and Guba (1985). Credibility was ensured through prolonged engagement, triangulation, and member checking. Transferability was achieved through thick description of the research context. Dependability was maintained through an audit trail of all research processes, while confirmability was strengthened through reflexivity to minimize researcher bias and ensure objectivity. Table 1 presents a concise overview of the research design used in this study.

Table 1. Summary of the research design

Design element	Description in this study
Research type	Normative-empirical (socio-legal) legal research

Design element	Description in this study
Approaches	Statutory, case, conceptual, and comparative approaches
Data sources	Primary (interviews, observation, case documents: BAP, visum et repertum, indictment, judgment) and secondary (legislation, jurisprudence, scholarly literature)
Informant categories	Victim family, eyewitnesses, investigators, prosecutors, judges, and legal practitioners/NGOs; purposive sampling to saturation
Analysis techniques	Normative legal analysis, case analysis, content analysis, and thematic analysis
Validity strategy	Source, methodological, and theoretical triangulation; trustworthiness criteria of Nowell et al. (2017)

Table 1 shows that the study employed a normative-empirical (socio-legal) legal research design using statutory, case, conceptual, and comparative approaches. Data were collected from primary sources, including interviews, observations, and case documents, as well as secondary sources such as legislation, jurisprudence, and scholarly literature. Informants were selected through purposive sampling from six stakeholder groups until data saturation was achieved. The data were analyzed using normative legal, case, content, and thematic analyses, while validity was ensured through source, methodological, and theoretical triangulation following the trustworthiness criteria of ([Nowell, Norris, White, & Moules, 2017](#)).

4. Results and Discussions

4.1 Criminal Law Regulation of Assault Resulting in Death Committed by Police Officers

The regulation of assault resulting in death is governed by Article 351 paragraph (3) of the Indonesian Criminal Code (KUHP), which provides that: “If the act results in death, the offender shall be punished with imprisonment for a maximum term of seven years.” This provision is classified as aggravated assault based on its consequence, where the perpetrator intentionally commits an act of violence directed at another person, with the purpose of causing pain or injury, but without the intention to cause death, even though the act ultimately results in the victim's death.

From a doctrinal perspective, the offense contains several essential legal elements that must be proven cumulatively. First, there must be a physical act in the form of violence directed toward another person. Second, the act must be accompanied by intent (*dolus*) to assault, which is distinct from intent to kill. Third, the act must result in death as an objective consequence. Fourth, there must be a direct causal relationship (*causaliteit*) between the act and the resulting death. The presence of these four elements determines whether criminal liability under Article 351(3) can be imposed. The distinction between assault resulting in death and murder under Article 338 KUHP lies fundamentally in the element of *mens rea*. Murder requires *dolus directus* or *dolus eventualis* directed toward causing death, whereas Article 351(3) only requires intent to injure. This distinction is crucial in cases involving law enforcement officers, where the defense often argues operational necessity or absence of intent to kill.

In the context of police officers, criminal liability remains fully applicable without immunity. Law No. 2 of 2002 concerning the Indonesian National Police confirms that police officers are subject to general criminal jurisdiction. Furthermore, Article 29 explicitly establishes that members of the National Police are tried under the general courts, not special tribunals. In addition, the use of force by police officers is regulated under Police Regulation No. 8 of 2009, which establishes strict principles of legality, necessity, proportionality, and accountability. These principles serve as operational boundaries for law enforcement actions. Any use of force that exceeds these limits may transform lawful conduct into unlawful criminal conduct, thereby triggering criminal liability.

Finally, accountability for police officers operates under a dual structure, consisting of criminal liability through the ordinary courts and administrative liability through the Police Code of Ethics

Commission (KKEP). Although both mechanisms operate independently in principle, in practice they are often sequentially linked, where ethical proceedings may follow or accompany criminal adjudication depending on case development.

4.2 Criminal Liability of Bripda Mesias in the Assault Resulting in Death Case

4.2.1 Reconstruction of the Facts

Based on the examination of case documents, witness testimonies, and the visum et repertum report, the factual chronology of the case can be reconstructed in a structured manner to establish legal clarity regarding the sequence of events and the causal relationship between actions and outcomes. On 15 March 2026 at approximately 20:00 Eastern Indonesia Time (WIT), Bripda Mesias and one accompanying officer were conducting a routine patrol in Ohoiel Village, Pulau Dullah District, Tual City. During the patrol, they encountered the victim, Yohanis Ratulangi, who was walking alone in the area. The officers then conducted an identity check as part of standard policing procedures.

During this interaction, a verbal misunderstanding occurred between Bripda Mesias and the victim. The situation escalated when the victim was perceived as being non-cooperative and verbally resistant ([Brunson, 2007](#)). This escalation transformed a routine encounter into a physical confrontation. Subsequently, Bripda Mesias used excessive physical force against the victim. He struck the victim's head three times using the buttstock of a firearm and followed with five additional kicks directed at the victim's abdomen and chest. These actions caused the victim to collapse immediately, accompanied by visible bleeding from the head and signs of severe physical trauma.

Following the incident, the victim was transported to the Tual Regional General Hospital in critical condition. Medical records indicate severe cranial injury, internal bleeding, and blunt-force trauma to vital body regions. Despite intensive medical treatment for three days, the victim died on 18 March 2026. The Visum et Repertum No. VER/45/III/2026 issued by the Tual Regional General Hospital confirmed that the cause of death was severe cranial trauma resulting in epidural hematoma and cerebral edema. The medical findings were consistent with repeated blunt-force impacts to the head, thereby establishing a direct link between the violence inflicted and the victim's death.

4.2.2 Analysis of the Fulfillment of the Elements of the Criminal Offense

Based on a juridical analysis of the reconstructed facts in relation to Article 351 paragraph (3) of the Indonesian Criminal Code, the actions of Bripda Mesias fulfill all constitutive elements of the offense of assault resulting in death. The legal analysis of each element is essential to determine the scope of criminal liability in this case. The first element concerns the existence of a concrete physical act. In this case, Bripda Mesias committed active physical violence in the form of striking the victim's head with a firearm buttstock and kicking the victim's body multiple times. These actions constitute positive acts (commission) that clearly fall within the scope of unlawful physical aggression. The deliberate and repeated nature of the conduct confirms that the act was not accidental, but intentionally performed.

The second element requires that the act qualifies as assault. In Indonesian criminal jurisprudence, assault is defined as any intentional act directed at causing pain, injury, or physical suffering to another person. The nature of the violence inflicted, targeting the victim's head and vital body areas with repeated force, clearly demonstrates an intention to cause physical harm. Therefore, the conduct satisfies the legal threshold of assault under Article 351 KUHP. The third element relates to criminal intent. The manner in which the violence was executed, repeated blows using a hard object and multiple kicks directed at vulnerable body parts, indicates the presence of intent to injure (*animus laedendi*), which in Indonesian criminal jurisprudence is assessed objectively based on the nature, direction, and force of the conduct rather than solely on the perpetrator's express declaration ([Oramas, Terrill, & Foster, 2023](#)). However, based on available evidence, there is no sufficient indication of intent to kill (*animus necandi*). This distinction is crucial in differentiating Article 351(3) from homicide provisions under Article 338 KUHP. Thus, the mental element in this case is limited to intent to cause harm rather than intent to cause death.

The fourth element is the occurrence of death as a consequence of the assault. The visum et repertum explicitly confirmed that the victim died due to severe cranial trauma resulting in epidural hematoma and cerebral edema. These medical findings are consistent with blunt-force impacts inflicted during the assault. Furthermore, a direct causal relationship (*conditio sine qua non* and adequate causation theory) exists between the actions of Bripda Mesias and the victim's death. Without the assault, the fatal outcome would not have occurred. Therefore, the causal nexus between act and consequence is legally established.

4.3 Analysis of Criminal Liability

In assessing criminal liability, it is necessary to determine whether the defendant possessed criminal responsibility and whether any grounds of justification or excuse exist that may eliminate or reduce such responsibility. Criminal liability under Indonesian criminal law requires the fulfillment of three core elements, namely the capacity to be responsible, the existence of unlawful conduct, and the absence of legally recognized grounds excluding liability. In this case, Bripda Mesias possessed full criminal capacity as he was an active police officer, twenty-eight years old, and in sound physical and mental condition, with no evidence of psychological impairment or incapacity that could negate his responsibility. Accordingly, he was fully capable of understanding and controlling the consequences of his actions.

The defense argument invoking justification under Articles 48 and 50 of the Indonesian Criminal Code cannot be sustained, as the factual circumstances do not indicate any imminent threat or emergency situation that would justify the use of force. The victim did not engage in physical aggression, and the force applied by the defendant was excessive and disproportionate when assessed against the principles of legality, necessity, and proportionality under Police Regulation No. 8 of 2009. Therefore, the conduct falls outside the scope of lawful execution of duty and cannot be legally justified.

Furthermore, no grounds of excuse are applicable in this case, as there is no evidence of coercion (*overmacht*), necessity, or excessive self-defense (*noodweer excès*) that could eliminate criminal responsibility. The absence of both justification and excuse confirms that the defendant's conduct remains fully attributable to him under criminal law. Accordingly, all legal requirements for criminal liability are fulfilled, and Bripda Mesias is fully criminally responsible for the conduct committed. This conclusion bridges the doctrinal framework established in section 4.1 with the empirical facts of the case, affirming that the absence of immunity under Article 29 of Law No. 2 of 2002 operates not merely as a textual rule but as a judicially enforceable norm constraining the exercise of coercive authority ([Sklansky, 2008](#)). The criminal liability determination thus functions simultaneously as an application of substantive criminal law and as an institutional signal that occupational status cannot substitute for substantive legality in the assessment of law enforcement conduct.

4.4 Aggravating and Mitigating Factors

In determining an appropriate sentence, the court considered both aggravating and mitigating circumstances to ensure proportionality and fairness. The aggravating factors included the defendant's position as a law enforcement officer who violated public trust by committing a fatal act against a civilian who posed no serious threat. The manner of the assault was highly violent, involving repeated blows to the victim's head and body, resulting in death and serious harm to the victim's family. In addition, the defendant showed no genuine remorse and attempted to justify his actions as part of official duties.

The mitigating factors included the defendant's clean criminal record, his family responsibilities, his relatively young age with prospects for rehabilitation, and his respectful conduct during trial proceedings. However, the court found that the aggravating factors substantially outweighed the mitigating circumstances. Therefore, the imposed sentence was considered proportionate to the seriousness of the offense and necessary to uphold justice and public confidence in law enforcement.

4.5 Law Enforcement Mechanisms and the Judicial System in the Bripda Mesias Case

4.5.1 Internal Investigation and Criminal Investigation Process Following the report submitted by the victim's family on 19 March 2026, the Professional and Security Affairs Division (Propam) of the Maluku Regional Police immediately formed an investigative team to handle the case. The internal investigation included examination of the suspect and relevant witnesses, crime scene investigation, and collection of physical and documentary evidence.

These procedural developments, however, were accompanied by structurally predictable institutional resistance. The investigative process exhibited three systemic dysfunctions that commonly afflict intra-institutional accountability mechanisms: evidentiary distortion arising from peer solidarity, narrative contestation designed to requalify unlawful conduct as lawful operational response, and institutional deflection toward informal settlement channels that circumvent judicial scrutiny. Each of these dysfunctions reflects not individual misconduct but entrenched organizational pathologies within the police accountability architecture [Terrill et al., 2003](#).

That the investigation ultimately proceeded to formal prosecution is attributable not to robust internal enforcement capacity but to sustained external pressure from Kompolnas and civil society organizations, underscoring a structural dependency on non-institutional actors to activate accountability mechanisms. The formal designation of Bripda Mesias as suspect on 25 March 2026 and the subsequent transfer of the case file to the Tual District Prosecutor's Office on 15 April 2026 represent institutional compliance induced by external visibility rather than self-correcting oversight.

4.5.1 Prosecution Process

The prosecutorial phase presents an analytically significant institutional intersection: the point at which police-generated evidentiary submissions are subject to independent legal evaluation. The P-21 declaration on 25 April 2026 confirmed that the case file satisfied minimum evidentiary thresholds, triggering formal prosecution under Article 351 paragraph (3) of the Indonesian Criminal Code. The prosecution's sentencing demand of six years' imprisonment, including credit for pre-trial detention, reflects a charging posture that applied the standard criminal framework without invoking heightened accountability norms applicable to law enforcement offenders, a choice with institutional implications for deterrence signaling.

The defense's invocation of official duty as a justificatory ground represents a structurally recurring argumentative strategy in cases involving law enforcement defendants, one that transfers the doctrinal burden from proportionality analysis to operational characterization. Its rejection in this case, grounded in the evidentiary record, is analytically consistent with established doctrine under Articles 48 and 50 KUHP, which condition justification on demonstrable necessity and proportionality rather than occupational status.

4.5.2 Trial Proceedings and Judicial Decision

The trial proceedings at the Tual District Court, spanning 5 May to 25 June 2026, constituted the central institutional arena in which evidentiary claims were adjudicated and the legal boundaries of police authority were formally assessed. The adversarial structure of the proceedings, encompassing indictment examination, witness examination, expert testimony, physical and documentary evidence, and closing submissions, provided the procedural framework within which the accountability of a state agent was subjected to independent judicial evaluation.

The evidentiary record assembled during trial carried significant institutional weight. Testimonial evidence from eyewitnesses, medical personnel, and forensic experts established the factual narrative through sources independent of the police institution itself, thereby partially offsetting the evidentiary contamination risk associated with intra-institutional investigation. Physical evidence, including the firearm buttstock, bloodstained clothing, photographic injury documentation, and the visum et repertum, collectively constituted a forensic foundation that the court found sufficient to satisfy the standard of proof.

The court's finding of guilt represents a judicially authoritative determination that police authority is bounded by proportionality norms rather than shielded by occupational function. The rejection of the lawful-execution-of-duty defense operationalized the doctrinal principle that Articles 48 and 50 KUHP require objective necessity and proportionality, not merely the presence of an official operational context. This holding carries institutional significance beyond the individual case, affirming that the criminal law framework permits no categorical immunity premised on rank or institutional affiliation [Jackson et al., 2012](#).

Judgment No. 45/Pid.B/2026/PN Tual, issued on 25 June 2026, imposed five years' imprisonment with credit for pre-trial detention. That no appeal was filed rendered the judgment final and binding (*inkracht van gewijsde*). From an institutional accountability perspective, the sentence falls below the prosecution's demand and below the statutory maximum of seven years, a disparity that warrants scrutiny regarding whether courts apply consistent aggravation principles when the defendant holds law enforcement status, as identified in prior sentencing disparity studies [Boateng et al., 2024](#).

4.5.3 Obstacles and Challenges in Law Enforcement

The obstacles encountered across the investigative, prosecutorial, and adjudicative phases of this case reflect systemic, rather than incidental, institutional dysfunctions. Internal investigation independence is structurally compromised by the dual role of Propam as both a disciplinary body and a component of the same institutional hierarchy as the officer under investigation, generating inherent conflicts of interest that are not adequately addressed by existing governance architecture. Evidentiary integrity is further undermined by the organizational norm of corps solidarity, which creates structural disincentives for officers to testify against colleagues, producing a form of institutionalized evidentiary constraint that operates independently of individual witness intentions [Farrow, 2024](#).

Informal settlement practices constitute a parallel accountability-avoidance pathway that diverts cases from the formal criminal justice system prior to judicial scrutiny. Witness intimidation risks, whether direct or ambient, further erode procedural fairness by undermining the evidentiary basis available to prosecutors [Qureshi, 2022](#). Sentencing disparities across comparable cases weaken the deterrent function of criminal adjudication and reduce predictability, which in turn diminishes the normative signaling effect that consistent prosecution of law enforcement officers would otherwise produce. These conditions collectively indicate that the structural conditions for effective accountability are absent and require deliberate institutional redesign rather than incremental adjustment [Walker, 2012](#).

4.5.4 The Role of External Oversight and Civil Society

The accountability trajectory of this case demonstrates a structural dependency on external actors to compensate for internal oversight deficits. Kompolnas's monitoring function, while contributing to procedural visibility, operates through recommendatory authority rather than binding intervention capacity, a design limitation that renders external oversight contingent on institutional responsiveness rather than legally enforceable compliance. This architecture reflects a broader governance choice to preserve police institutional autonomy at the cost of oversight effectiveness.

Civil society organizations, including the Legal Aid Institute (LBH), KontraS, and Imparsial, performed a compensatory function by providing victim assistance and maintaining public evidentiary pressure through judicial monitoring [Setiawan & Tomsa, 2023](#). Media engagement similarly contributed to accountability by raising the reputational cost of institutional non-compliance [Goldsmith, 2010](#). That these non-state actors were instrumental in advancing the case underscores a normatively problematic condition: when formal accountability mechanisms require informal civil society activation to function effectively, accountability becomes selective, episodic, and dependent on case visibility rather than institutionally guaranteed.

The absence of binding enforcement authority in both Kompolnas and civil society mechanisms reveals a governance gap in the Indonesian police accountability framework: no actor external to the criminal justice chain holds legally compulsory investigative or sanctioning authority over police misconduct [Lührmann et al., 2020](#). Addressing this gap requires not merely expanding the mandate of

existing bodies but reconsidering the institutional architecture of police oversight at the systemic level, moving toward models in which independence, investigative capacity, and enforcement authority are structurally integrated rather than distributed across actors with only advisory functions [Bayley & Perito, 2010](#).

4.6 Discussion

The findings of this case indicate that the criminal liability of police officers for assault resulting in death is doctrinally clear but institutionally fragile. Article 351 paragraph (3) of the Criminal Code applies to police officers without immunity, supported by Article 29 of Law No. 2 of 2002 and the constitutional principle of equality before the law [Baker & Nasrudin, 2023](#). The reconstructed facts confirm that all elements of the offense are fulfilled, including act, assault, intent to injure (*animus laedendi*), death as a *praeter intentionem* consequence, and a *conditio sine qua non* causal link. The defense of lawful execution of duty is rejected because the use of force failed to meet necessity and proportionality standards under Police Regulation No. 8 of 2009, consistent with prior doctrinal distinctions between assault resulting in death and murder ([Oramas Mora et al., 2023](#); [Baker & Nasrudin, 2023](#)).

The case further reveals structural weaknesses in enforcement, particularly limited independence of internal investigations, evidentiary constraints due to institutional solidarity, sentencing disparities, and reliance on public pressure to ensure accountability. These findings are consistent with comparative studies suggesting that ad hoc external scrutiny cannot substitute for institutionalized oversight mechanisms as a foundation for consistent accountability outcomes [Hoekstra & Sloan, 2022](#). The five-year sentence imposed, while below both the prosecution's demand and the statutory maximum of seven years, reflects the persistent influence of mitigating factors associated with officer status and raises questions regarding the consistent application of aggravation principles in cases involving law enforcement defendants [Boateng et al., 2024](#).

A comparative reading of this case against the broader literature on police accountability reveals that the obstacles encountered, namely institutional solidarity, evidentiary contamination, and prosecution-police proximity, are not unique to the Indonesian context but constitute structurally recurring features of intra-institutional accountability systems ([Ba et al., 2021](#); [Oramas Mora et al., 2023](#)). This cross-jurisdictional convergence suggests that the challenges identified are systemic rather than contextually specific, and that reform interventions must be designed with structural depth rather than limited to procedural adjustments within existing institutional arrangements [Worden & McLean, 2017](#).

The role of civil society and media in this case warrants particular analytical attention. That accountability was advanced not by institutional self-correction but by the compensatory pressure of external actors, specifically Kompolnas, LBH, KontraS, Imparsial, and media scrutiny, exposes a normatively problematic dependency in which formal accountability mechanisms required informal activation to function. This condition is consistent with Kochel and Skogan's (2021) finding that public trust in law enforcement is shaped not merely by legal compliance but by perceptions of institutional responsiveness and transparency. When accountability is episodic and visibility-dependent, its deterrent and legitimating functions are fundamentally compromised.

The evidentiary dimension of this case also merits further reflection. The decisive role of forensic evidence, particularly the *visum et repertum*, in establishing causal linkage between the act and the fatal outcome illustrates both the strength and the fragility of the Indonesian criminal justice framework in police misconduct cases. Where independent forensic evidence exists, prosecution can proceed on objective grounds; where such evidence is absent or contested, institutional solidarity creates substantial barriers to evidentiary integrity ([Boateng et al., 2024](#); [Oramas Mora et al., 2023](#)). This finding underscores the importance of investing in forensic capacity and procedural independence as structural components of police accountability reform.

Overall, the study emphasizes that criminal accountability should not depend on public attention but on institutional safeguards such as independent investigation, consistent sentencing guidelines, and

stronger protection for witnesses and victims. From a theoretical standpoint, this case supports the proposition that legal accountability frameworks governing police conduct are structurally incomplete when enforcement depends on external mobilization rather than institutionalized mechanisms, suggesting that accountability theory must extend beyond doctrinal compliance toward an institutional design perspective that evaluates the conditions under which legal norms are capable of self-sustaining enforcement.

5. Conclusions

5.1 Conclusion

This study addressed three research questions regarding the criminal liability of police officers for assault resulting in death through the Bripda Mesias case in Tual City. First, the applicable legal framework is Article 351 paragraph (3) of the Indonesian Criminal Code, which applies universally without immunity for police officers, supported by Article 29 of Law No. 2 of 2002 and the principles governing the use of force under Police Regulation No. 8 of 2009. Second, the case confirms that all elements of the offense are fulfilled, including the act of violence, intent to injure rather than to kill, death as a *praeter intentionem* consequence, and a direct causal relationship, while the defense of lawful duty is rejected due to disproportional use of force. Third, although the legal framework is clear, accountability in practice is weakened by institutional limitations, including the lack of independence in internal investigations, evidentiary constraints due to institutional solidarity, sentencing disparities, and reliance on public pressure to ensure accountability.

The main contribution of this study lies in demonstrating that the gap in police accountability is not primarily doctrinal but institutional in nature. The findings show that legal certainty already exists, but its implementation is constrained by structural weaknesses within enforcement mechanisms. Accordingly, the central recommendation of this study is the establishment of an independent investigative mechanism for cases involving police officers, the development of clearer and more consistent sentencing guidelines, and the strengthening of witness and victim protection to ensure that accountability is not dependent on external public pressure.

5.2 Research Limitations

This study is limited to a single-case analysis based on the Bripda Mesias case in Tual City, primarily relying on legal documents and secondary data sources, with limited access to internal police investigative and disciplinary records. As a result, the findings may not be fully generalisable to other regions or other forms of police misconduct, such as excessive use of force, torture, or corruption cases. In addition, the study focuses mainly on legal and institutional dimensions and does not deeply examine broader sociological, psychological, or political factors influencing police behaviour. Finally, the analysis is constrained by the legal and institutional conditions prevailing at the time of the research.

5.3 Suggestions and Directions for Future Research

This study proposes several policy recommendations. First, the Indonesian National Police should strengthen transparency and independence in handling misconduct cases and reinforce human rights compliance through continuous training. Second, external oversight institutions, particularly Kompolnas, should be empowered with stronger authority, including the development of an independent investigative mechanism for serious allegations involving police officers. Third, witness and victim protection systems should be made more accessible, responsive, and effective to reduce the risk of intimidation and ensure procedural fairness. For future research, scholars are encouraged to expand beyond single-case studies and adopt comparative, multi-case, and socio-legal approaches. Future studies should also incorporate broader stakeholder perspectives, including police officers, prosecutors, judges, victims, and oversight bodies, to better understand how institutional culture, legal frameworks, and reform processes interact in shaping police accountability outcomes.

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Author Contributions

AM conceived the study, conducted the data collection and legal analysis, and drafted the manuscript. NS supervised the research, contributed to the theoretical framework, and critically revised the manuscript. RA contributed to the methodology and data interpretation and reviewed the manuscript. All authors read and approved the final version of the article.

References

- Ba, B. A., Knox, D., Mummolo, J., & Rivera, R. (2021). The role of officer race and gender in police–civilian interactions in Chicago. *Science*, 371(6530), 696-702. <https://doi.org/10.1126/science.abd8694>
- Baker, J., & Nasrudin, R. (2023). Is Indonesian police violence excessive? The dynamics of police shootings, 2005–2014. *Journal of Contemporary Asia*, 54(2), 181-209. <https://doi.org/10.1080/00472336.2022.2138773>
- Bayley, D. H., & Perito, R. (2010). The police in war: Fighting insurgency, terrorism, and violent crime. *Lynne Rienner*. <https://doi.org/10.1515/9781626371972>
- Bittner, E. (1970). The functions of the police in modern society. *National Institute of Mental Health*. <https://doi.org/10.1037/e575002012-001>
- Boateng, F. D., Pryce, D. K., Dzordzormenyoh, M. K., Hsieh, M.-L., & Cuff, A. (2024). Empirical examination of factors that influence official decisions in criminal cases against police officers. *American Journal of Criminal Justice*, 49(3), 462-484. <https://doi.org/10.1007/s12103-024-09756-w>
- Braun, V., & Clarke, V. (2019). Reflecting on reflexive thematic analysis. *Qualitative Research in Sport, Exercise and Health*, 11(4), 589-597. <https://doi.org/10.1080/2159676X.2019.1628806>
- Brunson, R. K. (2007). “Police don’t like black people”: African-American young men’s accumulated police experiences. *Criminology & Public Policy*, 6(1), 71-101. <https://doi.org/10.1111/j.1745-9133.2007.00423.x>
- Crank, J. P. (2004). *Understanding police culture (2nd ed.)*.
- Creswell, J. W., & Creswell, J. D. (2018). *Research design: Qualitative, quantitative, and mixed methods approaches (5th ed.)*.
- Denzin, N. K. (2017). *The research act: A theoretical introduction to sociological methods*.
- Engel, R. S., Corsaro, N., Isaza, G. T., & McManus, H. D. (2022). Assessing the impact of de-escalation training on police behavior: Reducing police use of force in the Louisville, KY Metro Police Department. *Criminology & Public Policy*, 21(2), 199-233. <https://doi.org/10.1111/1745-9133.12574>
- Farrow, K. (2024). Blame culture: The line between blame and accountability in policing. *Policing: A Journal of Policy and Practice*, 18, paae034. <https://doi.org/10.1093/policing/paae034>
- Gill, C., Weisburd, D., Telep, C. W., Vitter, Z., & Bennett, T. (2014). Community-oriented policing to reduce crime, disorder and fear and increase satisfaction and legitimacy among citizens: A systematic review. *Journal of Experimental Criminology*, 10(4), 399-428. <https://doi.org/10.1007/s11292-014-9210-y>
- Goldsmith, A. J. (2010). Policing’s new visibility. *British Journal of Criminology*, 50(5), 914-934. <https://doi.org/10.1093/bjc/azq033>
- Hoekstra, M., & Sloan, C. (2022). Does race matter for police use of force? Evidence from 911 calls. *American Economic Review*, 112(3), 827-860. <https://doi.org/10.1257/aer.20201292>
- Hough, M., Jackson, J., Bradford, B., Myhill, A., & Quinton, P. (2010). Procedural justice, trust, and institutional legitimacy. *Policing: A Journal of Policy and Practice*, 4(3), 203-210. <https://doi.org/10.1093/policing/paq027>

- Human Rights Watch. (2022). World report 2022: Events of 2021. *Human Rights Watch*. <https://doi.org/10.2307/j.ctvxcrx9q>
- Jackson, J., Bradford, B., Hough, M., Myhill, A., Quinton, P., & Tyler, T. R. (2012). Why do people comply with the law? Legitimacy and the influence of legal institutions. *British Journal of Criminology*, 52(6), 1051-1071. <https://doi.org/10.1093/bjc/azs032>
- Kochel, T. R., & Skogan, W. G. (2021). Accountability and transparency as levers to promote public trust and police legitimacy: Findings from a natural experiment. *Policing: An International Journal*, 44(6), 1046-1059. <https://doi.org/10.1108/PIJPSM-04-2021-0062>
- Krippendorff, K. (2018). *Content analysis: An introduction to its methodology* (4th ed.).
- Kutnjak Ivković, S., Maskály, J., Kule, A., & Haberfeld, M. M. (2022). *Police Code of Silence in Times of Change*.
- Lincoln, Y. S., & Guba, E. G. (1985). *Naturalistic inquiry*.
- Lührmann, A., Marquardt, K. L., & Mechkova, V. (2020). Constraining governments: New indices of vertical, horizontal, and diagonal accountability. *American Political Science Review*, 114(3), 811-820. <https://doi.org/10.1017/S0003055420000222>
- McLean, K., Stoughton, S. W., & Alpert, G. P. (2022). Police uses of force in the USA: A wealth of theories and a lack of evidence. *Cambridge Journal of Evidence-Based Policing*, 6(3-4), 87-108. <https://doi.org/10.1007/s41887-022-00078-7>
- Morgan, H. (2022). Conducting a qualitative document analysis. *The Qualitative Report*, 27(1), 64-77. <https://doi.org/10.46743/2160-3715/2022.5044>
- Nowell, L. S., Norris, J. M., White, D. E., & Moules, N. J. (2017). Thematic analysis: Striving to meet the trustworthiness criteria. *International Journal of Qualitative Methods*, 16(1), 1-13. <https://doi.org/10.1177/1609406917733847>
- Oramas Mora, D., Terrill, W., & Foster, J. (2023). A decade of police use of deadly force research (2011–2020). *Police Quarterly*, 26(4), 480-510. <https://doi.org/10.1177/10887679221123591>
- Qureshi, D. (2022). Witness protection: An imperative for criminal justice. *Journal of Victimology and Victim Justice*, 4(2), 116-129. <https://doi.org/10.1177/25166069211069698>
- Setiawan, K. M. P., & Tomsa, D. (2023). Defending a vulnerable yet resilient democracy: Civil society activism in Jokowi's Indonesia. *Journal of Current Southeast Asian Affairs*, 42(3), 350-371. <https://doi.org/10.1177/18681034231209058>
- Sklansky, D. A. (2008). *Democracy and the police*. Stanford University Press. <https://doi.org/10.1515/9781503624474>
- Tankebe, J. (2013). Viewing things differently: The dimensions of public perceptions of police legitimacy. *Criminology*, 51(1), 103-135. <https://doi.org/10.1111/j.1745-9125.2012.00291.x>
- Terrill, W., Paoline, E. A., III, & Manning, P. K. (2003). Police culture and coercion. *Criminology*, 41(4), 1003-1034. <https://doi.org/10.1111/j.1745-9125.2003.tb01012.x>
- Tyler, T. R. (2006). *Why people obey the law*. Princeton University Press. <https://doi.org/10.1515/9781400828609>
- Walker, S. (2012). Institutionalizing police accountability reforms: The problem of making police reforms endure. *Saint Louis University Public Law Review*, 32(1), 57-92. <https://doi.org/10.2139/ssrn.2139534>
- Weisburd, D., Telep, C. W., Hinkle, J. C., & Eck, J. E. (2010). Is problem-oriented policing effective in reducing crime and disorder? *Criminology & Public Policy*, 9(1), 139-172. <https://doi.org/10.1111/j.1745-9133.2010.00617.x>
- Weitzer, R., & Tuch, S. A. (2006). *Race and policing in America: Conflict and reform*.
- Worden, R. E., & McLean, S. J. (2017). *Mirage of police reform: Procedural justice and police legitimacy*. University of California Press. <https://doi.org/10.1525/9780520965256>
- Yin, R. K. (2018). *Case study research and applications: Design and methods* (6th ed.).