

Administrative Appeal Decision on Dismissal of Civil Servants After Serving Criminal Sentences

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ABSTRACT

This study examines the legal certainty of administrative appeals against the dismissal of civil servants (PNS) after serving criminal sentences, focusing on the role and authority of the State Civil Apparatus Advisory Board (BPASN). Using a normative juridical method with statutory and conceptual approaches, this research analyzes relevant legislation, legal doctrines, and a concrete case involving the dismissal of a civil servant despite evidence of timely reinstatement efforts. The findings reveal that the application of administrative law in such cases tends to be overly formalistic, often disregarding substantive evidence that reflects compliance with legal obligations. This condition undermines the principle of legal certainty, which requires not only clarity of norms but also consistency and fairness in their application. Furthermore, the study highlights the significant role of BPASN as a quasi-judicial body that ensures legal protection through material examination of facts and correction of administrative errors. From the perspective of proportionality, the imposition of dismissal as a severe sanction is deemed inappropriate when mitigating factors and good faith actions are evident. Therefore, the study concludes that achieving legal certainty in civil servant dismissal cases requires a balanced approach that integrates formal procedures, substantive justice, and careful administrative judgment.

Introduction

Every Civil Servant (PNS) has obligations and is bound by the code of ethics and code of conduct that must be complied with, both in the implementation of official duties and in life outside the office. Compliance with these norms not only aims to maintain the integrity and professionalism of state apparatus, but also to create clean governance and free from legal problems (Delphia & Yurikosari, 2022; Sodik, 2021). In this context, civil servants are not only positioned as implementers of public policies, but also as representatives of the state who must uphold the law and ethics in every action.

However, in practice, it is undeniable that there are civil servants who violate their obligations and code of ethics, even to commit criminal acts. This phenomenon shows that there is a gap between the norms regulated in laws and regulations and the reality on the ground. Civil servants who are involved in criminal acts in principle still have the same position before the law as other citizens, so they must undergo criminal justice proceedings in accordance with applicable provisions (Erawan et al., 2024; Putra et al., 2023). On the other hand, as state apparatus, civil servants must also be subject to the civil service administration legal mechanism that regulates disciplinary sanctions, including dismissal.

The problem becomes even more complex when there is a wedge between criminal law and

personnel administration law, especially in terms of dismissal of civil servants after serving a prison sentence (Hermawan et al., 2023; Pambudi & Kumoro, 2016; Siregar & Pamungkas, 2024). Under certain conditions, differences in interpretation of administrative provisions can cause disputes between civil servants and personnel supervisory officials. This shows that the implementation of legal norms does not always run in a linear manner, but can raise interpretation problems that have an impact on legal certainty for the civil servants concerned.

One concrete example can be seen in the case experienced by Mr. Alex (not his real name). Based on the court decision, the person concerned was proven to have committed the crime of falsifying documents in the form of a certificate of results from the COVID-19 clinical pathology laboratory and was sentenced to nine months in prison. After serving part of his sentence, Mr. Alex received an assimilation program and was declared completed on March 24, 2021. During this time, he had come to work on January 11, 2021 while still undergoing assimilation, and then officially reported back to the agency on March 27, 2021, which was less than 30 calendar days after completing his prison sentence (Fahmi et al., 2018; Salim & Rokan, 2023).

However, problems arose when the personnel supervisory official through the Regent's decree in February 2025 actually dismissed Mr. Alex with respect not at his own request. The reason used was that the person concerned did not apply for reactivation within 30 calendar days from the completion of serving his prison sentence (Nisoni, 2021; S&P 2022; Wiyardi et al., 2024). This decision raises questions about the consistency of the application of legal norms, especially related to the assessment of self-reporting actions that have been carried out by the person concerned.

In the face of administrative decisions that are considered detrimental, civil servants have the right to take administrative efforts as a form of legal protection. These efforts can be in the form of objections or administrative appeals that aim to re-examine the validity of the decision of the personnel supervisory official (Sudrajat & Hartini, 2018; Syam et al., 2020). This mechanism is part of the state administrative legal system designed to ensure control over government actions and provide space for state apparatus to obtain justice.

Mr. Alex's case was then submitted to the State Civil Apparatus Advisory Board (BPASN) through an administrative appeal mechanism. After going through the examination process, BPASN in May 2025 decided to cancel the Regent's decision. The main consideration used is the existence of convincing evidence that Mr. Alex has applied for reactivation as a civil servant within the specified period of time. This decision shows that there is a difference in assessment between the personnel supervisory official and BPASN in interpreting the facts and applicable legal provisions (Prasetyo et al., 2021; Wahyuni, 2021).

The existence of BPASN as a quasi-judicial institution has an important role in resolving personnel disputes, especially those related to the decision to dismiss civil servants. BPASN functions as an administrative appeal forum that provides a guarantee of legal protection for civil servants against the decisions of personnel supervisory officials that are considered not in accordance with the provisions of laws and regulations. In this case, BPASN not only acts as an examiner of formal legality, but also as an interpreter of legal norms that have direct implications for legal certainty and justice for the state civil apparatus (Fahmi et al., 2018; Marbun, 2018; Sudarwanto, 2022).

However, studies on the effectiveness and legal force of BPASN's decisions in ensuring legal certainty for civil servants are still relatively limited. Most previous research has tended to discuss the normative aspects of civil servant dismissal regulations or dismissal procedures, without in-depth examining how the BPASN decision is implemented and the extent to which it is able to provide legal certainty in practice (Delphia & Yurikosari, 2022; Erawan et al., 2024; Mulyono, 2022; Prasetyo et al., 2021; Rumaepa, 2019). In addition, there have not been many studies that specifically examine the conflict of interpretation between personnel coaching officials and BPASN in concrete cases, especially related to administrative deadlines such as reactivation applications.

The research gap shows the need to conduct a more comprehensive analysis of the role of BPASN in resolving personnel disputes, especially in the context of dismissing civil servants after serving prison sentences. This research is expected to contribute not only to the development of civil service administration law studies, but also to provide practical recommendations for policy makers to be able to apply legal norms more consistently and provide legal certainty for civil servants.

Based on this description, this study departs from the inconsistency in the application of civil service administrative legal norms and differences in interpretation between personnel supervisory officials and the State Civil Apparatus Advisory Board (BPASN) in the case of dismissal of civil servants after serving a prison sentence. This condition shows the importance of testing the extent to which BPASN's decision is able to guarantee legal certainty for the state civil apparatus. Therefore, this study aims to analyze the basis of BPASN's legal considerations in canceling the decision to dismiss civil servants, examine the conformity of the decision with the principle of legal certainty in state administrative law, and identify the implications of BPASN's decision on legal protection for civil servants.

Method

This research uses a normative legal research method (normative juridical), which is research that focuses on the analysis of applicable legal norms and their application in practice (Saebani, 2021; Zainuddin & Karina, 2023). The approaches used include the statute approach and the conceptual approach. The legislative approach is carried out by examining various regulations related to the dismissal of Civil Servants, including the Law on the State Civil Apparatus, the Law on Government Administration, the Government Regulation on Civil Servant Discipline, and other technical regulations. Meanwhile, a conceptual approach is used to analyze legal principles such as legal certainty, authority, and proportionality in state administrative law.

The types of legal materials used in this study consist of primary, secondary, and tertiary legal materials. Primary legal materials include laws and regulations and related decisions, including the decision of the State Civil Apparatus Advisory Board (BPASN) in the case of dismissal of civil servants after serving a sentence. Secondary legal materials are in the form of legal literature, books, scientific journals, and the opinions of experts such as Gustav Radbruch, Philipus M. Hadjon, and Indroharto that are relevant to the research topic. Tertiary legal materials are used as a complement, such as legal dictionaries and encyclopedias that support the understanding of the legal concepts used.

The technique of collecting legal materials is carried out through literature studies by tracing

and reviewing various legal documents and literature that are relevant to the research problem. Furthermore, the analysis of legal materials is carried out qualitatively using a descriptive-analytical method, namely by describing the applicable legal norms, relating them to facts in concrete cases, and analyzing the suitability between norms and practices. Through this method, the study seeks to assess whether the decision of BPASN in canceling the decision to dismiss civil servants is in accordance with the principles of legal certainty, authority, and proportionality in state administrative law.

Results and Discussion

Legal Certainty in Dismissal of Civil Servants After Serving a Criminal Sentence

This case is relevant to be studied because it shows that there is a discrepancy between the administrative facts and the decisions taken by the personnel supervisory officials. The employee concerned has actually made efforts to reactivate as a civil servant, but is still sentenced to dismissal on the grounds that he does not fulfill the obligation to submit within 30 calendar days from the completion of serving his prison sentence (Delphia & Yurikosari, 2022). This condition raises fundamental questions about how the principle of legal certainty is applied in the practice of personnel administration, especially when there is evidence that substantially demonstrates the fulfillment of administrative obligations.

In this context, the analysis of this case cannot be separated from Gustav Radbruch's thoughts on the three basic values of law, namely justice, legal certainty, and utility. These three values should be applied in a balanced manner in every legal decision-making, including in the realm of personnel administration. Legal certainty is not only interpreted as the textual application of rules, but also must consider substantive justice so as not to cause decisions that are formally correct but materially detrimental to certain parties.

Normatively, Article 44 paragraph (3) of the State Civil Service Agency Regulation Number 3 of 2020 is the legal basis for the dismissal of civil servants who have served prison sentences. This provision requires civil servants to submit an application for reactivation no later than 30 calendar days after completing their prison sentence, with the consequence of dismissal if these obligations are not fulfilled. This norm basically aims to ensure the good faith of the civil servant concerned to return to carrying out their official duties. However, the application of these norms cannot be carried out rigidly without paying attention to concrete facts and existing administrative evidence, because it has the potential to ignore the principle of justice.

In this case, there is administrative evidence in the form of a self-report statement dated March 27, 2021 which was received by the authorized officials and witnessed by two employees. The self-report was carried out within three days after the person concerned completed serving his sentence. This fact shows that there is a real effort from the employee to fulfill his administrative obligations. Therefore, substantially the action can be viewed as a form of reactivation application, although it may not fully meet the required formal format. In the perspective of administrative law, evidence showing the existence of administrative actions within the specified time limit should have the force of law to be recognized as the fulfillment of obligations.

This view is in line with the thinking of Philipus M. Hadjon who emphasized that in state

administrative law, a balance is known between the principle of formality and the principle of substance. The principle of formality requires that every administrative action be carried out according to a predetermined procedure, while the principle of substance emphasizes that the meaning and purpose of a legal action must take precedence over the mere fulfillment of formal aspects. Thus, the assessment of the employee's actions should not stop at the procedural aspect, but also consider the substance of the action.

In addition, there are other issues that reinforce the legal uncertainty in this case, namely the long time lag between the submission of the self-report in 2021 and the administrative follow-up in the form of the formation of an audit team in January 2024. The delay for almost three years shows the administrative inaction of the authorized agencies. In the principle of legal certainty, government administration is required to act quickly, appropriately, and within a reasonable period of time. Unreasonable delays can actually cause legal uncertainty that is detrimental to parties who have good faith in fulfilling their obligations.

Thus, responsibility for unclear employment status cannot be fully imposed on the employee concerned. On the contrary, such administrative inaction should be a factor considered in the imposition of sanctions, and can even be a reason to judge that the dismissal decision does not meet the principles of legal certainty and justice.

From a broader perspective, the existence of an administrative appeal mechanism through BPASN does provide room for correction of erroneous decisions. The BPASN's decision to overturn the dismissal decision in this case shows that the administrative legal system still provides an instrument to correct administrative errors. However, the existence of this corrective mechanism should not be used as a justification for the lack of careful decision-making at the initial level. Ideally, personnel coaching officials should be able to conduct a comprehensive examination of facts and evidence before making a decision, so as not to cause protracted disputes.

Therefore, this case emphasizes that legal certainty in the dismissal of civil servants does not only depend on the existence of clear norms, but also on consistency in the application of these norms, accuracy in assessing facts, and the professionalism of the apparatus in carrying out its administrative functions. Without this, legal norms intended to provide certainty can actually become a source of uncertainty for the state civil apparatus.

BPASN's Authority in Canceling Dismissal Decisions

The settlement of personnel disputes through administrative efforts is a form of legal protection for the state civil apparatus against the decisions of personnel supervisory officials that have the potential to be detrimental. Within this framework, Government Regulation Number 79 of 2021 provides space for civil servants to submit objections and administrative appeals as a control mechanism for government administrative actions (Mulyono, 2022; Rumapea, 2019). This shows that Indonesia's administrative legal system not only places the government as a decision-maker, but also provides corrective instruments to test the validity of those decisions.

The analysis of the authority of the State Civil Apparatus Advisory Body (BPASN) in annulling the dismissal decision cannot be separated from the theory of authority in state administrative law. According to Indroharto, every state administrative decision must be based on

legitimate authority, whether it comes from attribution, delegation, or mandate. The legality of this authority is the main prerequisite in assessing the validity of an administrative decision. In line with that, Philipus M. Hadjon explained that the authority obtained through attribution is the original authority given directly by laws and regulations. In this context, BPASN obtained authority by attribution based on Law Number 20 of 2023 and Government Regulation Number 79 of 2021. Thus, BPASN has legal legitimacy to examine and decide administrative appeals in personnel disputes, including canceling dismissal decisions that are considered not in accordance with legal provisions.

The authority of BPASN must also be understood in the framework of checks and balances in the management of the state civil apparatus. As a quasi-judicial institution, BPASN not only functions as an ordinary administrative forum, but also as a mechanism for supervision over the use of authority by personnel supervisory officials. This is important to prevent abuse of authority and ensure that every administrative decision is based on objective and rational legal considerations.

In the case of a quo, BPASN uses its authority to cancel the Regent's decision on the grounds that the dismissal decision is not in accordance with the existing legal facts. BPASN considers that there is sufficient evidence that the employee has applied for reactivation within the specified period of time. This consideration shows that BPASN not only conducts a formal test of the decision-making procedure, but also conducts a material assessment of the substance of the facts on which the decision is based.

This is important because in administrative practice, the fault often lies not in the procedural aspect, but in the assessment of facts and evidence. Thus, the authority of BPASN in conducting material examinations is an important instrument to ensure that administrative decisions are not only formally valid, but also substantially fair. Therefore, the cancellation of the dismissal decision by BPASN in this case can be seen as a form of correction to the misinterpretation of the facts by the personnel supervisory official. However, the existence of this corrective authority also indicates that the decision-making process at the initial level does not fully reflect the principles of prudence and professionalism. Ideally, personnel coaching officials should be able to comprehensively verify administrative evidence before imposing sanctions, so as not to cause disputes that lead to the cancellation of decisions. In other words, the function of BPASN should be the ultimate remedium in the administrative system, not a mechanism that is routinely used to correct administrative errors.

Proportionality in the Imposition of Dismissal Sanctions

The principle of proportionality is one of the fundamental principles in state administrative law that functions to ensure that every action or decision of the government is carried out reasonably, rationally, and not excessively. This principle requires a balance between the goals to be achieved and the impact caused by an administrative decision. In this context, Article 83 of Law Number 30 of 2014 concerning Government Administration expressly places proportionality as one of the elements that must be considered in every decision-making.

Within the framework of personnel discipline, Government Regulation Number 94 of 2021 has regulated the classification of disciplinary punishments consisting of light, medium, and severe punishments. Dismissal with respect not at your own request is a form of severe disciplinary punishment that has the most serious consequences, namely the termination of the employment

relationship and the loss of employment rights, including the right to retire. Therefore, the imposition of this sanction should be carried out very carefully and only applied if it really meets the criteria for a serious violation.

According to Sjachran Basah, in imposing administrative sanctions, state administrative officials are obliged to carefully consider factors that can mitigate or burdensome. This reflects that the imposition of sanctions should not be carried out mechanically based on norms alone, but must take into account the context and concrete conditions of each case (Erawan et al., 2024; Pambudi & Kumoro, 2016).

In the case of Mr. Alex, the imposition of the sanction of dismissal does not meet the principle of proportionality. First, there is evidence that the person concerned has made efforts to reactivate within the specified period of time. Second, there is no indication of bad faith or intentionality to avoid administrative obligations. Third, the act of reporting oneself immediately after completing a criminal sentence shows a commitment to return to carrying out duties as a state civil servant.

In addition, the disproportion can also be seen from the inconsistency in the interpretation of the fulfillment of administrative obligations. Even though there has been evidence of self-reporting and submission of a reactivation application, the government still considers these obligations to be unfulfilled. This shows that the imposition of sanctions is not based on an objective assessment of the facts, but on a formalistic interpretation.

From the perspective of administrative law, dismissal as the heaviest sanction should be placed as the ultimate remedium, i.e. a last resort that is only used if there are no other lighter and more effective alternatives. If the goal of coaching and enforcing discipline can still be achieved through other mechanisms, such as reactivation or the imposition of lighter sanctions, then the application of dismissal sanctions becomes disproportionate and has the potential to violate the principle of justice.

Thus, an analysis of this case shows that the main problem lies not only in the aspect of compliance with norms, but also in how these norms are applied proportionately. Without the application of the principle of proportionality, administrative decisions have the potential to cause injustice and reduce the main purpose of the personnel discipline system itself, namely the development and improvement of the behavior of the state civil apparatus.

Conclusion

Based on the discussion that has been described, it can be concluded that the application of the principle of legal certainty in the dismissal of civil servants after serving a sentence has not been fully consistent. Although normatively there are provisions that regulate the obligation to submit a reactivation within a certain period of time, its application in concrete cases shows a formalistic tendency to ignore facts and administrative evidence. In this case, the self-reporting action carried out within the specified time limit should be recognized as a form of substantial fulfillment of administrative obligations. Therefore, the decision to dismiss that does not consider these aspects is contrary to the principle of legal certainty which requires clarity, consistency, and fairness in the application of legal norms.

The authority of the State Civil Apparatus Advisory Board (BPASN) in canceling the

dismissal decision shows the important role of this institution as a corrective mechanism in the civil service legal system. The BPASN decision not only reflects the application of legitimate authority by attribution, but also emphasizes the importance of materially testing facts and evidence in any administrative decision-making. In addition, from the perspective of proportionality, the imposition of dismissal sanctions in this case does not meet the principle of balance between the violation and the sanctions given, so the cancellation of the decision is the right step to ensure legal protection for civil servants. Thus, this study emphasizes that legal certainty in dismissing civil servants does not only depend on the clarity of norms, but also on the accuracy of interpretation, the prudence of administrative officials, and the application of the principle of proportionality in every decision.

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