

Juridical Analysis of Player Abuse of Referees in Soccer Matches

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Abstract

In football matches there are often beatings (mistreatment committed by players against referees. This study aims to analyze the mistreatment of players against referees in football matches can be categorized as criminal acts, and analyze actions that can be taken by the police and PSSI against mistreatment or fights between players in football matches. This research uses the method of Sociological Juridical approach. The results showed that the actions of the players who mistreated the referee met the elements of the criminal act of persecution as stipulated in article 351 paragraph (1) of the Criminal Code. Second, the actions of the police in the case are: a. Conduct an investigation by summoning the two players who clashed on the field; b Dismiss the case, on the grounds that it is submitted to the PSSI's internal decision; Meanwhile, PSSI in this case, only imposed sanctions with a ban from competing for the next 2 matches, plus a fine.

Keywords: Persecution; Player; Referee; Football.

Abstrak

Dalam pertandingan sepak bola sering kali terjadi pemukulan (penganiayaan yang dilakukan oleh pemain terhadap wasit. Penelitian ini bertujuan untuk menganalisis perbuatan penganiayaan pemain terhadap wasit dalam pertandingan sepak bola tersebut dapat dikategorikan sebagai tindak pidana, dan menganalisis tindakan yang dapat dilakukan oleh pihak kepolisian dan PSSI terhadap penganiayaan atau perkelahian antar pemain dalam pertandingan sepak bola. Penelitian ini menggunakan metode pendekatan yuridis sosiologis. Hasil penelitian menunjukkan bahwa perbuatan para pemain yang melakukan penganiayaan kepada wasit memenuhi unsur tindak pidana penganiayaan sebagaimana diatur dalam pasal 351 ayat (1) KUHP. Kedua, bahwa tindakan pihak kepolisian dalam kasus tersebut adalah: a. Melakukan penyidikan dengan memanggil kedua pemain yang bertrok di lapangan; b Menghentikan perkara tersebut, dengan alasan diserahkan kepada putusan internal PSSI; Sedangkan PSSI dalam kasus tersebut, hanya menjatuhkan sanksi berupa larangan bertanding selama 2 pertandingan berikutnya, ditambah denda.

Kata Kunci: Penganiayaan; Pemain; Wasit; Sepak bola.



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A. INTRODUCTION

Crimes of abuse and fighting can occur in all activities of life, including in the world of soccer. It is not uncommon in this type of soccer sport for cases of persecution and fights to occur, both between supporters and between players.^{1,2}

Persecution is defined as an act that intentionally causes pain to another person's body or health, which results in injury, serious injury or death of a person (victim).^{3,4} This means that every action that fulfills the elements of persecution can be called a crime or criminal offense,^{5,6} which can certainly be charged with the Criminal Code.

Whereas fighting is regulated in Article 358 of the Criminal Code, which reads: "Whoever intentionally participates in an attack or fight committed by several people, then in addition to their respective responsibilities for specific acts, shall be punished". Imprisonment for a term of not more than two years and eight months, if the assault or the fight results in a serious physical injury only. Imprisonment for a term not exceeding four years, if the assault or the fight results in the death of any person. Crimes or criminal often acts of persecution or fights are triggered by the causal factors of the victim himself, meaning that the victim plays a role in the crime that befalls him.

Persecution and fighting can occur by and against anyone and in any situation.^{7,8} And what is interesting to highlight is that it can happen in a soccer match. One example that can be put forward here is David Son Sasube, the referee who officiated the national league 3 match between Farmel FC and NZR Summersari on February 9, 2022 some time ago, was ganged up

¹ Laras Astuti and Heri Purwanto, "Penanggulangan Anarkisme Suporter Melalui Kebijakan Hukum Pidana (Studi Kasus Persib Bandung Dan Persija Jakarta)," *Jurnal Bina Mulia Hukum* 5, no. 2 (April 4, 2021): 347–61, <https://doi.org/10.23920/jbmh.v5i2.3>.

² Ikhwan Abduh, "Tindakan Kekerasan Suporter Sepak Bola Dalam Perspektif Sosiologi Olahraga," *Jurnal Penjaskesrek* 7, no. 2 (2020): 289–300, <https://doi.org/10.46244/penjaskesrek.v7i2.1113>.

³ Rustam Rustam, Arpangi Arpangi, and Widayati Widayati, "The Parameter Analysis of Serious Injury in the Crime of Maltreatment," *Ratio Legis Journal* 1, no. 3 (2022): 382–88, <https://doi.org/10.30659/rlj.1.3.%25p>.

⁴ Maswita Maswita, M. Sakti Pulungan, and Indra Gunawan Purba, "Tinjauan Yuridis Tentang Penganiayaan Akibat Rasa Sakit Hati (Kajian Kepada Putusan Nomor : 2142/Pid.B/2021/PN Medan)," *Jurnal Normatif* 2, no. 2 (December 31, 2022): 190–96, <https://doi.org/10.54123/jn.v2i2.228>.

⁵ Alfian Maulidin Ichwanto, "Tindak Pidana Penganiayaan Dalam Hukum Pidana Islam," *Al-Qanun: Jurnal Pemikiran Dan Pembaharuan Hukum Islam* 20, no. 1 (April 23, 2018): 181–206, <https://doi.org/10.15642/alqanun.2017.20.1.181-206>.

⁶ Ni Putu Kristin Ningtyas Kusuma, Anak Agung Sagung Laksmi Dewi, and I Made Minggu Widyantara, "Pembelaan Terpaksa (Noodweer) Sebagai Penghapus Tindak Pidana Penganiayaan Yang Menyebabkan Kematian (Studi Putusan Perkara Pidana Nomor 115/Pid. B/2021/PN Stb)," *Jurnal Analogi Hukum* 5, no. 1 (2023): 21–27, <https://doi.org/10.22225/ah.5.1.2023.21-27>.

⁷ Wahyu Pramono and Dwiyantri Hanandini, "TINDAK KEKERASAN TERHADAP ANAK DI SEKOLAH: Bentuk Dan Aktor Pelaku," *Jurnal Administrasi Publik Dan Pemerintahan* 1, no. 1 (January 30, 2022): 1–12, <https://doi.org/10.55850/simbol.v1i1.6>.

⁸ Muhammad Rifa'at Adiakarti Farid, "Kekerasan Terhadap Perempuan Dalam Ketimpangan Relasi Kuasa: Studi Kasus Di Rifka Annisa Women's Crisis Center," *Sawwa: Jurnal Studi Gender* 14, no. 2 (October 21, 2019): 175–90, <https://doi.org/10.21580/sa.v14i2.4062>.

on by 6 NZR players as a result of being annoyed with the referee's decision which was considered to be in favor of the opponent.

One interesting thing to highlight is the attitude of Head of the Malang District Police, Bambang Hermanto who followed up on the referee's report and summoned the 6 NZR players, for questioning (*Jawa Pos, Thursday, February 10, 2022 page 17*). According to the police, the actions of these players are considered to have fulfilled the elements of criminal acts of persecution and fighting so that they must be processed by applicable law.

Then interestingly is the statement of one of the disciplinary commissions of the Indonesian Football Association (PSSI) Muzakki that the actions of the police were actually the wrong address, because the fight occurred during the match so that it could not be charged legally, especially in the Articles of Association (AD) PSSI has been strictly regulated that if a case occurs, whether it contains criminal or civil elements in the national football environment, especially during a match, it is not allowed to bring the case to the court table (*Jawa Pos, Friday 10 February 2022 page 19*).

Juridically, the act of beatings and even beatings that cause pain, injury and even death of other people has been regulated as a criminal offense of persecution,^{9,10} as regulated in the Criminal Code, namely articles 351-357.

But on the other hand, in the perspective of sports, the incident in question is a natural thing to happen, even in sports such as boxing, karate, silat, taekwondo, wrestling and wushu, hitting actions even tend to injure the opponent is indeed a necessity. But can it be considered normal if it happens in soccer? Hitting, kicking and even knocking down opponents in martial arts sports such as karate, silat and boxing may be normal. But in soccer it is a violation. Because an offense must be punished. The problem, is the punishment enough from the referee who leads the match, or has it gone far into the realm of criminal law? This is what should be studied.

Article 21 of the Articles of Association (AD) PSSI 2003 stipulates that every case, both civil and criminal, that occurs within the PSSI football environment, must be resolved through the internal PSSI, not allowed to be submitted to the court.

However, until now no one has conducted research related to criminological analysis of cases of persecution of players against referees in soccer matches (Study at the PSSI Jakarta office). This writing will examine the persecution committed by soccer players against referees and legal efforts made by the police and the PSSI.

B. METHOD

In this legal writing, the research method used is Juridical Sociological, namely the author's discussion that adheres to certain regulations to be used as direction and analysis material in analyzing legal symptoms that arise (sociological aspects) which become

⁹ Muhammad Zulfikar and Amsori Amsori, "Legal Consequences for Perpetrators of Beating Police Members on Duty," *Jurnal Hukum Sehasen* 8, no. 2 (2022): 121–24, <https://doi.org/10.37676/jhs.v8i2.3031>.

¹⁰ Gunsu Nurmansyah, Bambang Hartono, and Melika Rapita, "IMPLEMENTASI PERTANGGUNGJAWABAN PIDANA TERHADAP PARA MAHASISWA SEBAGAI PELAKU PENGANIAYAAN YANG MENGAKIBATKAN KEMATIAN (STUDI PUTUSAN NOMOR 13/Pid. B/2020/PN. GDT)," *PALAR (Pakuan Law Review)* 7, no. 2 (2021): 160–73, <https://doi.org/10.33751/palar.v7i2.3776>.

problems,¹¹ especially related to the practice of handling cases of persecution or fights between players in football. In this study the authors chose a research location at the PSSI Jakarta office, and Polresta Malang, because in this institution data and documents from the case can be obtained and processed and resolved legally. Data obtained through interview techniques and literature studies.

C. RESULTS AND DISCUSSIONS

1. Overview of Cases of Player Mistreatment of Referees

On Thursday, February 9, 2022 at the Gajayana stadium in Malang, a league 3 match was held between Farmel FC and NZR Sumbersari. At that time the match score was 1 - 1. Then, when the match ended simultaneously the NZR players chased the referee and then hit and kicked the referee David Son.

When the riot occurred, the security forces had tried to break up and protect the referee, but the players were still able to carry out the persecution.

After the match referee David Son reported the incident to the Malang Police. And then the next day 6 NZR players were questioned by Malang Police investigators.

The players were accompanied by the CEO of NZR to clarify at Polresta Malang. While on the other hand PSSI through the vice chairman of the Disciplinary Commission Muzakki regretted the actions of the police, the police should have coordinated with PSSI first, because the incident took place during the match and in the middle of the field, although PSSI itself realized that it was the right of the police. Meanwhile, PSSI through the disciplinary commission imposed a sanction in the form of a 2-time match ban and a fine of 5 million rupiah each.

2. Overview of Cases of Player Mistreatment of Referees

Based on the description in sub-chapter A above, it is concluded that the actions of the NZR players are a polemic whether it is an offense or not. Although in juridical analysis, it can actually be categorized as having violated the provisions of Criminal Law stipulated in the Criminal Code, specifically Article 351 paragraph (1) of the Criminal Code on persecution.

Article 351 of the Criminal Code reads: (1) Maltreatment shall be punished by a maximum imprisonment of 2 years and 8 months or a maximum fine of R. 4,500.

According to the doctrine of criminal law, the elements of the crime of maltreatment include:

- a. Intentionality;
- b. The existence of an act;
- c. The existence of the effect of the action (which is intended), namely in the form of :
 - 1) body pain
 - 2) body wounds

¹¹ Kornelius Benuf and Muhamad Azhar, "Metodologi Penelitian Hukum Sebagai Instrumen Mengurai Permasalahan Hukum Kontemporer," *Gema Keadilan* 7, no. 1 (April 1, 2020): 20–33, <https://doi.org/10.14710/gk.2020.7504>.

The first element is a subjective element (fault), the second and third elements are objective elements. Regarding the element of behavior is very abstract, because with the term / word act alone, then in its concrete form is not limited to its form, which in general the form of these actions contains the nature of physical violence and must cause bodily pain or bodily injury.

Tongat in (2003;69) details the elements of article 351 of the Criminal Code into :

a. The element of intent.

A person can be said to have committed the crime of maltreatment, if the person has the intention to commit an act that can cause pain or injury to the body.^{12,13}

b. Elements of conduct

This means that the act must be an activity or activity of a human being using (some) of his body members, no matter how small the activity is. The element of action is also abstract, which can be in the form of various kinds and forms of actions such as hitting, kicking, pinching, slicing, hacking and so on.¹⁴

c. The element of the effect of the act (what is intended)

The act of inflicting pain is the occurrence or generation of pain or stinging, discomfort or suffering without requiring a change in the appearance of the body. Causing injury is a change in the appearance of the body so that it becomes different from the state of the body before the offense.^{15,16}

d. Which result is the sole purpose of the actor.

In the crime of maltreatment, the result in the form of pain or injury to the body must be the sole purpose of the perpetrator. The perpetrator does want the pain or injury to occur because of the act that has been committed.^{17,18} If the result in the form of pain or

¹² Alvina Alvina and Rahaditya Rahaditya, "Pertanggungjawaban Pidana Pada Pelaku Penganiayaan Terhadap Debt Collector: Studi Kasus Putusan Pengadilan Negeri Palembang Nomor 261/Pid/2019/Plg," *UNES Law Review* 6, no. 1 (2023): 1150–57, <https://doi.org/10.31933/unesrev.v6i1.834>.

¹³ I Kadek Agus Irawan, I Nyoman Sujana, and I Ketut Sukadana, "Tindak Pidana Penganiayaan Yang Mengakibatkan Matinya Seseorang (Studi Kasus Putusan Nomor: 24/Pid. B/2013/PN. Sp)," *Jurnal Analogi Hukum* 1, no. 3 (2019): 341–46, <https://doi.org/10.22225/ah.1.3.2019.341-346>.

¹⁴ Adde Pramana Putra and Aprima Suar, "Tindak Pidana Penganiayaan Terungkap Direncanakan Terlebih Dahulu Mengakibatkan Korban Luka-Luka (Studi Putusan PN Brebes Nomor: 57/ Pid.B /2020 / PN.BBs.)," *Reformasi Hukum Trisakti* 5, no. 2 (April 1, 2023): 533–44, <https://doi.org/10.25105/refor.v5i2.15827>.

¹⁵ Lailatus Sururiyah, "Tinjauan Kriminologi Terhadap Suami Pelaku Penganiayaan Dalam Rumah Tangga," *De Lega Lata: Jurnal Ilmu Hukum* 2, no. 2 (2017): 328–50, <https://doi.org/10.30596/dll.v2i2.1160>.

¹⁶ Lilis Rahmawati and Safik Faozi, "Penerapan Restorative Justice Terhadap Pelaku Tindak Pidana Penganiayaan Ringan Di Kejaksaan Negeri Semarang," *UNES Law Review* 6, no. 1 (2023): 681–91, <https://doi.org/10.31933/unesrev.v6i1.876>.

¹⁷ Valtala Leifyumna Jauza, "Pertimbangan Hakim Dalam Menjatuhkan Putusan Yang Menyatakan Tuntutan Penuntut Umum Tidak Dapat Diterima Serta Upaya Hukumnya Dalam Perkara Penganiayaan," *Verstek* 5, no. 1 (2017), <https://doi.org/10.20961/jv.v5i1.33414>.

¹⁸ Ni Nyoman Ayu Pulasari Dewi, Made Sugi Hartono, and Komang Febrinayanti Dantes, "Implementasi Prinsip Restorative Justice Pada Perkara Tindak Pidana Penganiayaan Biasa Di Polres Buleleng," *Jurnal Komunitas Yustisia* 5, no. 1 (March 30, 2022): 242–53, <https://doi.org/10.23887/jatayu.v5i1.45948>.

injury is not the purpose of the perpetrator but only a means to achieve another proper purpose, then in this case no persecution has occurred.¹⁹

Indeed, normatively, in the opinion of the author, the act of persecution of players against referees in soccer matches can be charged with articles in the Criminal Code, especially the persecution of Article 351 paragraph (1) of the Criminal Code because it fulfills the elements of the article. (Wiryo Prodjodikoro; 1986;76). Indeed, if these elements are associated with the case of the NZR player, it is clear that the actions of the two players fulfill these elements, namely that both of them are proven to have intentionally committed the act, then both of them also obviously carry out actions or actions of hitting and punching, as well as the element of the existence of the target object of the punches and fists of the two players, so that it can be categorized as a criminal act because it fulfills the elements of Article 351 paragraph (1) of the Criminal Code.

Thus, it is only right if law enforcers, both the Police, the Prosecutor's Office and the Court, bring this case to the judicial process as described in the previous chapters. This means that juridically the actions of the two players can be categorized as an offense or criminal act.

So once again it is emphasized that juridically the actual actions of the players in the form of persecution of the referee can actually be charged by the Criminal Code, especially Article 351 paragraph (1) of the Criminal Code,²⁰ because it fulfills the elements of the article. However, the problem is, that in the world of any sport (including soccer, and especially martial sports such as boxing) this provision cannot necessarily be applied, considering that in the Greek Olympic Basic Convention Rules, especially article 5, it is clearly not the authority of the authorities. Therefore, it is very reasonable reason for the Metro Jaya Police Chief's refusal to further process the case of complaints of fights between these players, even recommending that it be resolved internally by the organization concerned (Tri Gustoro, former PSSI Secretary General, Jakarta, July 6, 2003).

3. Legal Actions of the Police and PSSI in the Case of Player Maltreatment against Referee

This study is very interesting, because if there is a case of beating (persecution), then who is the authority, is it PSSI or the police?

Indeed, in the Greek Olympic Basic Rules / Convention (Tri Goestoro, former PSSI secretary general), especially article 5, it is stated that: "Every event or incident that causes problems or problems between players and players, or judges / referees, the management of the sports association, is resolved by the parent sport concerned". This provision is used as a basic guideline by every sports parent around the world. Remember the case of Mike Tyson who committed the act of biting Evander Holyfield's ear, resolved by the US Sports Committee. The basic provisions also inspired the rules of soccer matches at both the FIFA and PSSI levels. In article 21 of the Articles of Association (AD) PSSI 2003 stated that: "every case, both civil and

¹⁹ Bambang Sugeng Irianto, "Tinjauan Yuridis Tindak Pidana Penganiayaan Oleh Pemain Sepakbola Di Dalam Kompetisi Regional Pssi Ditinjau Dari Kuhp," *Jurnal Justiciabelen* 2, no. 2 (August 19, 2020): 1, <https://doi.org/10.30587/justiciabelen.v2i2.1631>.

²⁰ bintang Yudho Yuono, "Lex Sportiva Terhadap Tindak Pidana Penganiayaan Dalam Sepakbola Indonesia," 2018.

criminal, that occurs in PSSI environmental football, can only be resolved by the internal PSSI, not allowed to be submitted to the court table".

But in practice, it turns out that especially the case of NZR players is actually resolved internally by PSSI. For this reason, it is necessary to discuss this phenomenon.

a. Police Actions

For cases during the implementation of matches in the PSSI main division, what is interesting to study is the attitude of law enforcers who feel that this case is their authority to investigate and process it.

According to the view of the police (Kombes Pol Budi Hermanto; Kapolresta Malang), that the case of persecution of players against referees in football is actually enough to fulfill the elements of a criminal offense, especially when it is carried out outside the match.

Furthermore, in addition to fulfilling the elements of the offense, the actions of the NZR players were carried out shortly after the match whistle ended.

Thus, based on the results of the study, it was found that the police action (Polresta Malang) against the case of player persecution of the referee was:

- 1) Conduct an investigation by summoning 6 players who beat and kicked the referee on the field.
- 2) Dismiss the case.

This means that Polresta Malang considers this case to be insufficient to fulfill the elements of a criminal offense and it is the PSSI's internal authority to impose punitive sanctions.

b. PSSI Action

In the PSSI management structure, there is a special institution in charge of cases of fights or abuse between players, administrators or referees, namely the PSSI East Java Disciplinary Commission chaired by Mr. Martin.

When receiving a report from the match supervisor in practice the PSSI Disciplinary Commission (Komdis) conducts a hearing which is attended by at least the chairman of the Komdis, and the process invites the parties to the dispute or related to the case concerned. In contrast to the procedural process according to Criminal Procedure Law, especially in terms of examining perpetrators, victims and witnesses, where in Criminal Procedure Law there is an opportunity to be confronted or brought together in court, while in handling cases in PSSI so far the examination is usually carried out alternately without having to be confronted. So that objections often arise from parties who feel aggrieved by the Komdis decision.

In handling cases of persecution, generally Komdis in making decisions is based on information from related parties such as players, both perpetrators and victims, match supervisors, referees, video recordings and news or photos in the mass and electronic media.

While the decision is based on several PSSI provisions, including the PSSI General Match Rules and PSSI Match Special Rules, namely

1) PSSI General Match Rules

Usually applied in this provision, especially regarding the limitations and elements of persecution as stated in article 40 and the threat of sanctions in article 54, namely: Players who commit persecution in the stadium environment outside the field of play both before and after the match are subject to punishment in the form of temporary dismissal / suspension for a minimum of 1 (one) year and a maximum of 2 (two) years and a fine.

However, in practice PSSI does not immediately apply these sanctions, but based on alternatives or gradations as stipulated in article 43, namely Warning, Expulsion (both carried out or given by the referee), Temporary Suspension / Suspension (by Komdis), Fines (decided by Komdis).

According to article 49, it states that:

- a) The penalty set out in this regulation is a minimum penalty.
- b) If two offenses are committed at the same time, the more severe of the two is punished with an increase of one-third.
- c) In the event of repetition of the offense, the punishment for such repetition has not been expressly provided for, the amount of the punishment may be increased from the amount of the punishment for the offense by an additional 1/3 (one-third) or a maximum not exceeding 2 (two) times the punishment for the offense.
- d) If the offense is committed by a foreign player and/or official, the FIFA Regulations shall apply to him in full, and if there is a difference in the amount of punishment for his offense, the higher of the two shall apply to him.
- e) Foreign Players and/or Officials who commit repeated offenses of abuse, doping, strikes, or disturbance of order and security, may be subject to penalties in the form of fines and *persona non grata*.

2) PSSI Match Special Rules

In organizing competitions for which special regulations are made as referred to in article 1 paragraph (2) of this Regulation, other penalties may be regulated by referring to this Regulation and the amount of fines may be determined to exceed the amount of fines in this general Regulation, according to the level of competition/tournament.

According to this Special regulation, the provisions regarding punishment as stipulated in article 50 are emphasized:

- a) The penalties that can be imposed on individuals are:
 - (1) Warning
 - (2) Expulsion
 - (3) Fines
 - (4) Prohibition to participate in a certain number of matches and/or football activities for a certain period of time.
 - (5) Temporary dismissal / lifetime dismissal from participating in official football activities.
 - (6) *Persona non grata* (disfavored person)

- b) Penalties that can be imposed on the Association/Club/Union/Match Organizer Attention.
- (1) Warning
 - (2) Semntar stops
 - (3) Fines
 - (4) Cancellation of matches (if it is deemed necessary to hold a match
 - (5) Repeat)
 - (6) Grade reduction and/or cancellation
 - (7) Prohibition of using a stadium / match venue
 - (8) Matches are played in the absence of spectators.
 - (9) Matches played at neutral venues
 - (10) Moving the venue to a specially designated venue
 - (11) Prohibition to participate in the competition running next competition

The penalty for maltreatment is set out in Article 54, namely :

- 1) For players who commit maltreatment and have been sentenced to expulsion from the field of play by the Referee, then the Player automatically becomes an invalid player for the next 3 (three) matches and the PSSI Disciplinary Commission according to its level and authority can impose additional penalties.
- 2) Players who commit persecution in the stadium environment outside the field of play both before and after the match are subject to punishment in the form of temporary dismissal / suspension for a minimum of 1 (one) year and a maximum of 2 (two) years and a fine.
- 3) Officials, Match Officials, Administrators who commit persecution are subject to a penalty in the form of temporary dismissal / suspension for a minimum of 1 (one) year and a maximum of 2 (two) years and a fine.

One thing that needs to be stated here is that PSSI often imposes sanctions or punishments inconsistently (Wibie Andreas, NZR manager), such as sanctions in similar cases and the same incident are not the same in the punishment imposed with consideration because the player is a national asset (Budi Sudarsono's case was only sentenced to a warning and a fine of 10 million rupiah, while Ahmad Kurniawan was sentenced to 2 years and a fine of 10 million rupiah, even though he was proven to have committed a fight.

Regarding the existence of rules issued by FIFA, in the case of fights between players in a match has never been applied in Indonesia, meaning that in this case PSSI is sufficient to apply the provisions issued by the internal organization. Except in other cases, such as sanctions for Mursyid Effendi who openly created an own goal against Indonesia to beat Thailand to avoid Vietnam in the Sea Games semifinals in Vietnam 2000, where Mursyid Effendi was sentenced to suspension by FIFA in the form of a ban on playing soccer both in local or domestic and international events for 2 years plus a 1000 dollar fine.

D. CONCLUSION

Juridically, the actions of the players who committed persecution against the referee can be categorized as fulfilling the elements of the crime of persecution as regulated in Article 351 paragraph (1) of the Criminal Code. The actions of the police in this case were to conduct an investigation by summoning the two players who clashed in the field and to stop the case, under the pretext of being submitted to the PSSI internal decision. The PSSI action in this case, only imposed sanctions in the form of a ban on competing for the next 2 matches, plus a fine of 5 million rupiah each. In order to avoid cases of beating or persecution in football matches, the players themselves should realize that the act in question is an act that tarnishes the spirit of sports, so that each party behaves in accordance with the applicable organizational rules, therefore it is necessary to have a forum for non-technical up-grading activities in the form of mental and spiritual debriefing of players. As a court in the field, of course the referee should be fair in accordance with the rules of the soccer game so as to ensure the implementation of the match safely without a fight arising. Likewise with the audience, should provide support to his team that is competing not to carry out forms of provocation that result in a fight between players.

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