

Reconstruction of Criminal Liability in Infanticide of Children Born out of Wedlock: A Juridical Feminism Perspective

Yuni Ristanti¹, Atika Zahra Nirmala¹

¹ Universitas Mataram, Indonesia

ARTICLE INFO

Keywords:

Infanticide;
Criminal Liability;
Illegitimate Child;
Juridical Feminism;
Gender Inequality;
Indonesian Criminal Law;
Legal Reform

Article history:

Received 2025-04-10

Revised 2026-05-14

Accepted 2026-06-18

ABSTRACT

The phenomenon of infanticide involving children born out of wedlock reflects not merely individual conduct but a complex interplay of psychological pressure, social stigma, and gender inequality. This study aims to analyze the regulation of infanticide under the Indonesian Criminal Code, examine the ambiguity of the phrase “fear of being discovered by others,” and assess criminal liability from a feminist legal perspective, including the role of the biological father. This research employs a normative legal method with statutory and conceptual approaches. The findings indicate that Article 460 constitutes a *delictum proprium* that designates the mother as the offender based on biological conditions. However, its formulation remains partial and fails to address underlying structural factors. The phrase “fear of being discovered by others” is vague and may lead to interpretative disparities. From a feminist legal perspective, the provision reproduces gender inequality by concentrating liability on women, while the role of the biological father remains insufficiently addressed. Accordingly, reconstructing criminal liability to incorporate the role of the biological father and broader social factors is necessary to achieve gender-sensitive substantive justice.

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Corresponding Author:

Yuni Ristanti

Universitas Mataram, Indonesia; yuniristanti29@staff.unram.ac.id

1. INTRODUCTION

The phenomenon of neonatal child killing is identified in medical and legal scholarship as infanticide. This grave act, most often perpetrated by biological parents, reflects a multifaceted global concern. Its complexity cannot be reduced to a singular dimension; rather, it requires a holistic examination through interconnected lenses, including medical conditions, psychological factors, social dynamics, and the governing legal framework. (Rosmawaty, Rizal, & Khomeini, 2025)

Infanticide involving children born out of wedlock is particularly prevalent, as illustrated by several reported cases, including the killing of a newborn by an unmarried young couple in Karawang (DetikJabar, 2025), the mutilation of an infant driven by fear of social exposure following widowhood (Yakub Mulyono, 2025), a vocational high school student burying her baby due to fear of being discovered pregnant outside marriage (Aminudin, 2025), and the killing of an infant triggered by

conflict with a fiancé (Humas Polres Kupang, 2025). These cases collectively indicate that a dominant underlying factor in recurring incidents of infanticide is the absence of a legally recognized marriage, which intensifies social stigma and contributes to the perpetration of such acts.

The regulation of infanticide is stipulated under Article 460 of the National Criminal Code, whereas in the former Criminal Code it was governed under Articles 341 and 342 without a specific and comprehensive formulation. Article 460 paragraph (1) provides that a mother who takes the life of her child at the time of birth or shortly thereafter, due to fear that the birth will be discovered by others, shall be punished for infanticide with a maximum imprisonment of seven years. Paragraph (2) further stipulates that if the act is committed with prior planning, the offender shall be subject to a maximum imprisonment of nine years. Paragraph (3) regulates the participation of other parties, providing that any person who takes part in the commission of the offense as referred to in paragraph (1) shall be punished in accordance with Article 458 paragraph (1), or, if related to paragraph (2), in accordance with Article 459. (Indonesia, 2023) This provision constitutes a special-subject offense (*delictum proprium*), as it specifically designates the mother as the principal legal subject of the crime.

Article 460, which regulates a mother who kills her child due to fear that her actions will be discovered by others, does not provide an explicit explanation regarding the specific conditions referred to in the provision. Nevertheless, the formulation in Article 460 of the National Criminal Code, particularly the phrase “a mother who gives birth and subsequently fears being discovered by others,” may be interpreted as framing the birth as a form of social disgrace. In this context, such “disgrace” is generally understood as an undesired birth from the mother’s perspective, for instance one occurring outside a lawful marriage or within particular social circumstances that generate significant psychological pressure. (Fuadi Isnawan, 2018)

From the examined reports and judicial decisions, a pattern of impunity concerning the father’s role (absence of accountability) becomes evident. In many instances, the biological father constitutes a primary contributing factor to the mother’s psychological distress, whether through refusal to assume responsibility, abandonment, or as a result of unequal power relations. Nevertheless, the current criminal law framework effectively exempts the father from the scope of Article 460, placing him within a legal grey area (legal lacuna). Within the broader context of criminal offenses related to reproduction and women’s bodies, this imbalance becomes increasingly apparent. Women are frequently positioned as the primary subjects who bear moral, social, and legal burdens, particularly in cases involving pregnancies outside marriage. The disproportionate social stigma imposed upon women generates severe psychological pressure, which, under certain circumstances, may precipitate extreme actions. However, criminal law constructions often fail to fully account for these dimensions and instead tend to frame such acts as purely individual conduct. Conversely, the role of men in relationships leading to pregnancy is frequently marginalized within the framework of legal accountability. This condition produces an imbalance in the distribution of responsibility, whereby women not only endure social consequences but also become the most vulnerable to criminalization. This research aims to analyze the regulation of infanticide, to identify the presence of potential gender bias within the relevant criminal provisions, and to formulate directions for legal reform that are more equitable and proportionate. Previous studies have largely focused on the normative juridical aspects of infanticide without critically examining gender power relations and the contribution of other parties in constructing criminal liability. Accordingly, this study offers a juridical feminist perspective as a more comprehensive analytical approach.

2. METHODS

This study employs a normative legal research method with statutory, case, and conceptual approaches. The statutory approach is conducted by examining provisions within the Indonesian Criminal Code (KUHP Nasional), particularly Article 460, and correlating them with Articles 341 and 342 of the former Criminal Code. The legal materials used consist of primary legal materials in the form of legislation and court decisions, secondary legal materials including literature, journal articles, and

legal doctrines, and tertiary legal materials as supporting sources such as news reports and court decisions. that strengthen the author's arguments (Marzuki, 2016). The collection of legal materials is carried out through library research. The analysis of legal materials is conducted qualitatively using a descriptive-analytical method, which is further enriched by the feminist perspective of Catharine A. MacKinnon to identify potential gender bias in the regulation and application of criminal law in infanticide cases, particularly those involving children born out of wedlock(Mackinnon, 1989).

3. FINDINGS AND DISCUSSION

a. The Regulation of Infanticide under Indonesian Criminal Law

1) Elements of the Offense

Article 460 of the Indonesian Criminal Code (KUHP Nasional) consists of three paragraphs. Paragraph (1) regulates ordinary infanticide, paragraph (2) governs premeditated infanticide, and paragraph (3) addresses individuals who participate in either ordinary or premeditated infanticide. The constituent elements of Article 460, as elaborated following Andi Hamzah's method of analyzing statutory elements in the Criminal Code, are as follows:

- Subject (Offender): In paragraphs (1) and (2), the subject is the mother, whereas paragraph (3) extends liability to other persons who participate in the commission of the offense.
- Temporal Element: The act must be committed immediately after childbirth.
- Motive: The act is driven by fear of the birth being discovered by others.
- Sanctions (Penalties): Ordinary infanticide is punishable by a maximum of seven years' imprisonment, while premeditated infanticide carries a maximum penalty of nine years. In cases involving participation by other persons, ordinary infanticide is punished in accordance with the provisions on ordinary murder, whereas participation in premeditated infanticide is sanctioned equivalently to premeditated murder, carrying a maximum penalty of twenty years' imprisonment.

2) The Character as *Lex Specialis* in Relation to Homicide

The explanatory section of this provision establishes a special rule, whereby the article provides for a mitigation of criminal sanctions based on the consideration that a mother's fear of her childbirth being discovered by others is, in itself, regarded as a form of suffering. This explanatory provision serves as the primary basis for classifying Article 460 paragraphs (1) and (2) as *lex specialis*. Furthermore, the prescribed penalties differ from those applicable to general homicide offenses, as they fall within the category of moderate sentencing severity, in accordance with the classification of punishment levels as articulated by Barda Nawawi. This distinction further reinforces the special nature of the provision in comparison to general homicide norms within the Criminal Code. (Arief, 2014)

3) The Vagueness of the Phrase "Fear of Being Discovered by Others"

In addition to the classification of penalties as moderate, the phrase "fear of being discovered by others" is not clearly defined within the Indonesian Criminal Code. The explanatory section merely acknowledges that the existence of such fear constitutes a basis for mitigating punishment, treating it as a form of suffering experienced by the mother. However, there is no further clarification as to the nature or degree of "fear" intended, nor is there any specification regarding the scope of "others." This ambiguity opens the possibility for varying judicial interpretations, which may, in turn, give rise to disparities in court decisions and lead to subjective judicial assessments. Moreover, the use of this vague formulation is inconsistent with the principle of *lex certa*, which requires that criminal provisions be drafted with sufficient clarity to ensure legal certainty.(Marcelly M. Kantjai, 2016) Consequently, there is a need to formulate clear indicators or parameters regarding the notion of "fear" and "fear of being discovered by others" within the context of this offense.

4) Participation in Infanticide

Paragraph (5) of Article 20 of the Indonesian Criminal Code regulates the scope of participation in criminal offenses. It includes: (1) direct perpetration of the offense; (2) commission of the offense through an intermediary or by instructing another person who cannot be held criminally responsible; (3) joint participation in the commission of the offense; and (4) instigation, defined as inducing another person to commit a criminal act by means of offering or promising something, abusing power or authority, employing violence or threats of violence, deception, or by providing opportunity, means, or information. The regulation of criminal liability for other persons who participate in the offense of infanticide is specifically governed under Article 460, thereby establishing a distinct framework for participation within this particular offense. (Indonesia, 2023)

b. Feminist Perspectives on Criminal Liability

1) Social Stigma Against Women

According to the Indonesian Dictionary (KBBI) (Badan Pengembangan dan Pembinaan Bahasa, 2026), *aib* refers to shame, disgrace, stigma, fault, or wrongdoing. Moral pressure, as elaborated by Tangney et al., may be understood as a psychological condition in which an individual is driven to act in accordance with moral norms or values due to the presence, or anticipation, of moral emotions arising from a potential violation of such norms. In other words, moral pressure does not stem from physical or legal coercion, but rather from internalized emotional responses, including: guilt for harming others; shame for being negatively judged by society; fear of social rejection; and the need to preserve one's moral identity.

In the context of infanticide, the dominant psychological pressure is not *guilt*, but *shame*. (June Price Tangney, Stuewig, & Mashek, 2007) This is because the mother not only perceives her act as wrongful, but also experiences herself as a morally tainted individual in the eyes of her family and society. Shame is closely tied to one's identity ("I am bad"), whereas guilt is associated with a specific act ("I did something bad"). Consequently, the birth of the child may be perceived as tangible evidence that would expose the mother's perceived disgrace to the public.

In cases where the child is born out of wedlock, the infant is often socially constructed as a symbol revealing the violation of prevailing moral and social norms. Thus, moral pressure in infanticide involving children born outside marriage can be defined as a psychological condition arising from the internalization of social, moral, and religious norms that stigmatize such births as disgraceful. This condition generates feelings of shame, guilt, and fear of social rejection, which may ultimately drive the mother to commit infanticide as a means of avoiding social consequences perceived as more severe than the legal consequences of her actions.

2) Gender Inequality

Historically, relations between men and women have been characterized by structural inequality that places women in a subordinate position. Male dominance across various aspects of social life has persisted over a long period, reflected in the control of strategic roles within society. Exceptions to this pattern are limited to relatively small matriarchal communities. Accordingly, gender inequality has been embedded since the early development of civilization, resulting in the marginalization of women in multiple spheres of life. (Mansour fakih, 1996)

Gender, in essence, refers to socially constructed roles, behaviors, and expectations that distinguish men and women within a cultural context. In conventional social structures, men are typically positioned in the public sphere as heads of households, associated with masculine traits such as assertiveness and rationality. Conversely, women are directed toward the domestic sphere and associated with feminine attributes such as submissiveness and emotionality. This dichotomy, however, often fails to reflect the complexity of real-life dynamics, as traits such as assertiveness and emotional sensitivity are universal human characteristics that transcend biological distinctions. The persistence of rigid gender stereotypes is the result of extensive socialization processes beginning at an

early age. As these values are transmitted across generations as *culturally learned behavior*, they eventually become legitimized as binding cultural norms (*culturally assigned behavior*). (Kementerian Pemberdayaan Perempuan dan Perlindungan Anak., 2012)

Within the context of criminal law, particularly the regulation of infanticide under the Indonesian Criminal Code, these gender constructions are normatively reflected. The provision that designates only the “mother” as the subject of the offense demonstrates an underlying assumption that responsibility for childbirth and its social consequences—especially those perceived as disgraceful—is predominantly borne by women. Meanwhile, men, or biological fathers, are not constructed as perpetrators within the statutory formulation, despite their factual role in the occurrence of the pregnancy.

This indicates that the law is not entirely neutral, but is influenced by prevailing gender values and stereotypes. Women are not only burdened with reproductive roles but also bear disproportionate social and legal responsibility in cases of deviation, such as infanticide. Consequently, the regulation reflects gender inequality in the construction of criminal liability, positioning women as the primary bearers of responsibility while marginalizing the role of men within the normative framework. The provision effectively isolates the act as a crime committed solely by a woman (the mother), without acknowledging that such extreme decisions are often triggered by severe psychological pressure, social stigma (particularly in cases of extramarital pregnancy), fear, and the absence of a support system—especially from the biological father.

This condition aligns with Catharine A. MacKinnon’s critique of the purported neutrality of law. MacKinnon argues that law is not neutral, as it reflects and legitimizes unequal sexual power relations in society, wherein the state participates in subordinating women under male dominance. (MacKinnon, 1989) This masculine dominance is evident in the formulation of Article 460 of the new Criminal Code, which retains the same essential elements as its predecessor in the colonial-era Dutch Criminal Code, adopted through the principle of concordance. (Mokhammad Najih, 2014) As a result, Indonesian criminal law continues to reflect historical male-centered experiences and moral standards.

The law focuses solely on the final act—the killing of the infant—as an objective reality fully attributable to the mother. Conversely, it implicitly grants privilege to the male counterpart, allowing the biological father to evade responsibility for the consequences of the sexual relationship, under the assumption that his absence constitutes a private or moral issue rather than a legal one. Nevertheless, this critique should not be misconstrued as an attempt to absolve women of criminal liability. The taking of a human life, including that of a newborn, remains a criminal act that cannot be justified.

However, substantive justice requires that the law cease to impose the entirety of social and legal blame on a single party. Since infanticide arises from a sexual relationship involving two individuals, criminal liability should be distributed proportionally. The law must be deconstructed to enable the accountability of men who intentionally abandon or place women in conditions of psychosocial vulnerability, thereby preventing them from evading responsibility behind the shield of “private matters” while women bear the full burden of punishment.

Furthermore, although Article 460 of the Indonesian Criminal Code may not be formally biased—given that only women can biologically give birth—it remains substantively limited in that it focuses exclusively on the mother without adequately addressing the broader social context underlying the offense. This is reflected in the phrase “fear of being discovered by others,” which implicitly represents social pressure and moral burden imposed upon women, particularly in cases of extramarital pregnancy. In social reality, women are often stigmatized as the source of “disgrace,” while men, as biological fathers, are relatively free from comparable pressure. This creates a form of social impunity for men, reinforcing the perception that women are the sole bearers of responsibility for the consequences of such relationships.

Moreover, Article 460 does not merely provide case-by-case mitigation but instead establishes a lower range of penalties from the outset compared to ordinary homicide or familial homicide. This reduction is based on the assumption that the condition of “fear of public exposure” affects the

psychological state of the mother at the time of the offense. However, this approach remains focused on the individual perpetrator and fails to address broader structural factors, such as social pressure, stigma, and unequal power relations experienced by women. From MacKinnon's perspective, this illustrates how law, while appearing neutral, actually reflects dominant societal viewpoints. Consequently, it risks reproducing patriarchal structures by disproportionately assigning moral and legal burdens to women.

3) Analysis of the Criminal Liability of the Biological Father

The regulation concerning participation by other persons is contained in Article 460 paragraph (3). However, it is necessary to first clarify who qualifies as "other persons" within the meaning of this provision. Satochid identifies three forms of participation (*deelneming*): (1) multiple individuals jointly committing a criminal offense; (2) one individual who conceives and plans the offense and instructs another to carry it out; and (3) one individual who commits the offense while another assists in its execution. (Satochid Kartanegara, n.d.) Euterecht, meanwhile, categorizes participation into three forms: (1) the perpetrator (*dader*), (2) direct commission (*plegen*), and (3) indirect commission through another (*doen plegen*). (Eutericht, 1962) Utrecht emphasizes that a fundamental requirement for *medeplegen* (joint perpetration) is the existence of conscious and close cooperation (*bewuste en nauwe samenwerking*). However, in cases of infanticide, Eutericht argues that the biological father generally cannot be held criminally liable due to the absence of shared intent (*geen gezamenlijk opzet*) or dual intent (*double intent*), as well as the lack of *mens rea* to take life. (Eutericht, 1962)

Nevertheless, from the perspective of *psychische causaliteit* (psychological causation), the father's role in causing the pregnancy and his subsequent neglect may constitute a *conditio sine qua non*—an indispensable condition that gives rise to the mother's fear of public exposure and ultimately contributes to the commission of the offense. (Tongat, 2012) Furthermore, if the father acts as an instigator (*uitlokker*) by actively encouraging, pressuring, intimidating, or threatening the mother, he may be held liable under Article 460 paragraph (3) as a participant, bearing independent criminal responsibility (*zelfstandige aansprakelijkheid*). In such cases, the applicable penalty corresponds to that of ordinary or premeditated murder, rather than classification as familial homicide.

In contrast, where the biological father remains passive and does not participate in the act of killing, he generally escapes criminal liability, even in cases of neglect. However, considering that the offense incorporates the mitigating factor of "fear of being discovered by others," and that infanticide constitutes a *delictum proprium* (a special offense), the biological father's role in causing the pregnancy and his failure to assume responsibility may function as contributing factors that facilitate the occurrence of the crime.

c. Directions for Legal Reform

Legal reform in the context of infanticide should be formulated in a balanced manner, maintaining the mother as the primary subject of the offense due to biological considerations, while simultaneously acknowledging the role of the biological father in the construction of criminal liability. A layered liability framework may be developed, whereby the mother remains accountable under Article 460 of the Indonesian Criminal Code, while the biological father may also be held liable based on his role, particularly where it can be demonstrated that he was aware of the pregnancy and contributed to its concealment, neglected the woman in a vulnerable situation, or participated in actions aimed at facilitating or covering up the offense.

Such liability may be grounded in the doctrine of participation (*deelneming*) where active involvement is present, or alternatively through omission-based offenses where a legal duty has been neglected. To ensure proportionality and prevent over-criminalization, clear standards of proof must be established regarding the father's role. Liability should be based on concrete indicators—such as communication, testimony, or demonstrable forms of support or refusal—with a clear distinction between lack of knowledge, knowledge without action, and active involvement.

Additionally, reform should be directed toward strengthening judicial reasoning through guidelines requiring judges to examine the social context underlying the phrase “fear of being discovered by others.” Judges should assess not only the normative elements of the offense but also power relations, social pressures, and the potential involvement or neglect of the biological father. Such an approach enables a more proportional distribution of responsibility without negating the mother’s accountability as the principal offender.

Within the framework of Catharine A. MacKinnon’s feminist legal theory, law that appears neutral may, in reality, reflect dominant perspectives when it fails to account for underlying power relations. When legal norms focus solely on the mother without considering broader social structures and the role of other actors—particularly the biological father—the law risks reproducing inequality by concentrating moral and legal burdens on women. Therefore, legal reform should not aim to eliminate the mother’s liability, but rather to ensure that legal analysis incorporates power relations and the factual contributions of other parties, thereby achieving more substantive justice.

4. CONCLUSION

The phenomenon of infanticide involving children born out of wedlock demonstrates that such offenses cannot be understood merely as individual acts, but rather as manifestations of the complex interplay between psychological pressure, social stigma, and gender inequality within society. Article 460 of the Indonesian Criminal Code (KUHP Nasional) has indeed provided a normative basis for the criminal liability of the mother as the principal offender; however, its formulation remains partial, as it focuses solely on the condition of “fear of being discovered by others” without comprehensively addressing the structural factors underlying such fear. From the perspective of feminist legal theory, the existing legal construction tends to reproduce gender bias by positioning women as the sole subjects of criminal liability, while the role of the biological father—who, in many cases, contributes to both the occurrence of pregnancy and the resulting psychological pressure—remains unaddressed by the law. This reflects not only a normative gap but also a form of impunity for men within the criminal justice system. An analysis of judicial practice further indicates that differences in the construction of intent (*mens rea*) and the degree of violence influence the severity of sanctions imposed. However, such considerations have not fully incorporated the social dimensions and power relations underlying the offense. As a result, the current legal approach remains largely legalistic and has yet to fully respond to the demands of substantive justice. Accordingly, there is a need to reconstruct the framework of criminal liability in cases of infanticide. Such reconstruction should not merely emphasize the individual culpability of the mother, but must also integrate the accountability of the biological father while taking into account the broader social, psychological, and gender-based inequalities that shape the occurrence of the crime. This reformulation is essential to achieving a more just criminal law system—one that is gender-sensitive and capable of providing balanced protection for all parties involved.

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