

Sadomasochistic Behavior in the Perspective of Human Rights and Criminal Law

Moh. Sihabudin¹, Anang Dony Irawan²

¹ Fakultas Hukum, Universitas Muhammadiyah Surabaya, Indonesia

² Fakultas Hukum, Universitas Muhammadiyah Surabaya, Indonesia

ABSTRACT

Sexual deviant behavior is one of the many types of crimes that exist in Indonesia. This sexual deviant behavior activity is intended to achieve sexual satisfaction in an abnormal way, one of which is sadomasochistic behavior. Sadomasochistic behavior is synonymous with sexual activity that involves violence in it, both in the form of physical violence and mental violence from their partners. In practice, sadomasochistic actors seek sexual satisfaction with certain objects that arouse their sexual desires, thereby hurting their partners. This of course refers to criminal acts of sexual violence, apart from violating criminal law provisions, sadomasochistic acts are also prohibited in Human Rights. This article was compiled to find out about sadomasochistic behavior in the perspective of Human Rights and Criminal Law based on Law Number 12 of 2022 concerning Crimes of Sexual Violence. The method used in this writing is a normative research method using the statutory approach. Then analyzed and described to solve the topics discussed in this paper. The results of the study stated that sadomasochism in husband-wife relationships is prohibited behavior. Then analyzed and described to solve the topics discussed in this paper. The results of the study stated that sadomasochism in husband-wife relationships is prohibited behavior. Then analyzed and described to solve the topics discussed in this paper. The results of the study stated that sadomasochism in husband-wife relationships is prohibited behavior.

Keywords: Sadomasochistic Behavior; Human Rights; Criminal Law.

Article History;

Received
June 1, 2022

Revised
Oktober 20, 2023

Accepted
Desember 30,
2023

INTRODUCTION

Humans are a group of homo sapiens who are biologically and psychologically have a desire for sexuality. In practice, sexual offenders have their own ways of satisfying their sexual desires, both in normal and abnormal ways, namely sexual deviant behavior. Deviant sexual behavior is an inappropriate sexual act committed by a person or perpetrator of deviation where the act is outside the limits of established norms and is not accepted by the general public. Deviations in sexual behavior according to Hurlock (1998) in the journal Srajaresh (2021) are actions or behavior that are considered

disgraceful and violate the rules and legal norms and social values(Srajaresh, 2021). Perpetrators of sexual deviance themselves usually use sex aids or often called sex toys, this is due to the development of variations in sexuality that affect

the behavior and sexual behavior by using these aids to reach the highest level of climax desired by the offender.

The condition of abnormal sexual behavior is known as paraphilia. Paraphilia is defined as a sexual deviation towards objects that are not natural or sexual activity that is not usually done (Sakinah, 2021). Daud (Daud, 2016) defines paraphilia as sexual behavior that is not normally carried out by normal humans, where the perpetrator does it with certain objects, for example animals, something that smells of sexuality (in this case someone's insides) or minors. Besides that, Nugroho & Akbar (Nugroho & Akbar, 2020) added that consuming drugs and alcohol can affect paraphilia sufferers in releasing their sexual fantasies. So that perpetrators who suffer from this sexual deviance will experience a surge in sexual desire when imagining or even carrying out this sexual behavior which is referred to as sadomasochism. Nasyuha (Nasyuha, 2020) states that this sexual deviation arises because of strong and repeated sexual urges or fantasies to oneself.

In this modern era, discussing sexuality is certainly not a taboo subject, this is marked by a change in the paradigm of society who thinks that sexual issues must be discussed because as time goes by, crimes involving sexuality have also developed. One of the most common sexual crimes in society is sadomasochistic behavior. Nadita & Coal (Nandita & Batubara, 2023) states that this sadomasochistic act aims to give pain or vice versa with spices of violence, such as hitting, slapping, insulting, grabbing, and so on which is done either by himself or another person when having sexual intercourse as the fulfillment of his sexual satisfaction. In other words, this sadomasochistic actor seeks pleasure with violent spices, both extreme and mild violence in order to achieve a sensation of satisfaction in sexual intercourse.

The term sadomasochism comes from the words "sadism" and "masochism" which separately have a specific meaning, namely the perpetrator acts as a party that hurts (sadistic), and the perpetrator acts as a party that is hurt (masochistic). Nonetheless, sadomasochists describe themselves as BDSM (Bondage and Discipline Sadism and Masochism). BDSM is defined as the activity of torturing partners before or even during sexual intercourse (Srajesh, 2021). Generally, this BDSM behavior is based on the agreement of each party. But the facts on the ground found several cases where sadistic did not need masochistic approval during or before sexual intercourse. Even so, sadomasochistic behavior is still often carried out by a group of people, both couples who are legally married and illegal partners (not legally married), even these sadomasochistic couples switch roles between sadistic and masochistic when completing their sexual relationship (Ngazizah & Fatmawati, 2020).

Apart from being a part of criminal behavior, sadomasochistic sexual deviance also includes violations of human rights (HAM) as contained in Law Number 39 of 1999 concerning Human Rights. When it is related to human rights, sadomasochistic behavior is a form of sexual violence which contains elements of torture, inhumane treatment and degrading human dignity (Na'im, 2018). In the provisions of Articles 2, 7 and 22 of the Universal Declaration of Human Rights it has been emphasized that human rights include the right to life, the right not to be tortured, the right to freedom of expression, the right to religion, the right not to be enslaved, the right to be recognized as a person before the law, and the right

not to prosecuted on a retroactive legal basis, and cannot be reduced under any circumstances, this is also in line with the mandate of the 1945 Constitution (Sakinah, 2021). Meanwhile, from the point of view of positive criminal law and Islamic criminal law, this sadomasochistic deviant behavior is clearly considered a physical crime because it causes bodily injury or trauma to the victim or sexual partner. Rules regarding sexual violence are contained in Law Number 12 of 2022 concerning Crimes of Sexual Violence.

Along with the rapid development of the times, the level of sexuality issues is also increasing. The facts in the field state that there are many married couples who practice sadomasochism around us, both what we hear with our naked ears and what is posted on online platforms. Couples who carry out this sadomasochistic practice can be said to enjoy and animate their games too much to the point of forgetting the safety of their partners. Quoted from databooks.com, sexual violence in Indonesia ranks at the top of the Online Information System for the Protection of Women and Children with a total of 11,016 cases (Santika, 2023). This of course increases the crime rate in Indonesia. This is due to a person's psychological problems, both from internal and external influences that leave an impression on a person's memory, causing trauma for that person. Because of psychological problems or experiences from the environment in sexual intercourse, they often torture their partners to arouse their sexual desires. Based on this background, the topic that will be studied in this paper is how sadomasochistic behavior is in fulfilling the husband's sexual needs from a human rights perspective and how sadomasochistic behavior is accountable based on Law Number 12 of 2022 concerning Crimes of Sexual Violence.

METHODS

The research method used is normative research method using statutory approach. An approach in the science of law that begins with the process of understanding issues in accordance with the rule of law, by using legislation and regulations (Samsul Arifin, 2021). The legal sources used in this article are primary and secondary legal sources (Rosida et al., 2023). Primary legal sources are obtained from statutory regulations, namely Law Number 39 of 1999 concerning Human Rights and Law Number 12 of 2022 concerning Crimes of Sexual Violence. Secondary legal sources are obtained through written works or legal dogmas contained in dissertations such as journals, articles, dictionaries, books, research results in both print and electronic media (Akmaliya et al., 2023).

DISCUSSION AND RESULT

Sadomasochistic Behavior in Fulfilling Husband's Sexual Needs from a Human Rights Perspective

Husband and wife are foreign male and female couples who are bound in a family relationship. To become a married couple, two people, namely a man and a woman, must go through a process called marriage. The term marriage in legal language is marriage. Marriage in Article 1 of Law Number 1 of 1974 concerning Marriage is defined as an inner and outer bond between a man and a woman as husband and wife with the aim of forming a happy and eternal family based on Belief in the One Almighty God (Anisaningtyas & Astuti, 2011). When someone carries out a marriage bond, the thought is that getting married will end happily,

but the reality is not that beautiful. The same thing was stated by Juanda and Eveline (Juanda & Eveline, 2018) that over time married couples who are bound by marriage will be tossed about by various problems, both economic problems and in matters of sexuality.

In fulfilling sexual needs, not a few married couples engage in sadomasochistic behavior when having intercourse. This sadomasochistic term refers to BDSM behavior which is a form of physical torture, even more to sexual slavery. Sadomasochism is defined as sexual behavior which in its implementation contains elements of violence in order to complete sexual desires. Sadomasochistic behavior involves 2 people (couples) both of the opposite sex and the same sex. It is called that because one of the pair has their respective roles, one of them acts as a sadist and the other acts as a masochist. This sadomasochistic behavior is generally done on a consensual basis, but no doubt there are also couples who unilaterally carry out this sadomasochistic activity in sexual intercourse (Rohwanto & Suhartono, 2021), so that the victim will usually feel ashamed and degraded as a human being.

The sadomasochistic school is referred to as sadomasochism, which is defined as a way of obtaining pleasure from sexual desires with actions that involve "giving" and "receiving" pain and or shame (Halgin, 2007). Sadomasochism or often also referred to as BDSM is a form of sexual deviance in which in response to satisfaction it gives pain (sadism) or receives pain (masochism) (Rohwanto & Suhartono, 2021). In carrying out husband-wife relations, it is still found that many husbands commit sadomasochistic acts against their wives. This is due to watching immoral videos that exemplify these things, besides that this is also based on wild fantasies that want to practice these things with their partners. As previously explained, sadomasochistic or BDSM behavior is based on the will of the parties, so it is not uncommon for couples or couples to switch roles. The same thing was stated by Na'im (Na'im, 2018) in his writings, that it is not uncommon for couples who behave sadomasochistically to switch roles, for example on one occasion the husband acts as the sadist, while on another occasion the husband acts as the masochist.

Nowadays crimes and sexual deviations are rampant, both verbal and non-verbal sexual crimes. For example, in the Gilang case in 2020, this man from the city of Surabaya committed a sexual perversion that tortured his victim by wrapping the victim in a jarik cloth to achieve inner satisfaction. Then there is also a similar case related to a sadomasochistic victim, which was released from detiknews (2021) namely a wife with the initials Z who became a victim of her husband's sadomasochistic sexual behavior when she had sexual intercourse by hitting Z's body parts to the point of cornering cigarette butts into Z's body. Z also admitted that at another time the husband tied his hands and whipped Z's body. another, namely in the Batam area where the case was decided by a judge with case register number 32/Pid.B/2019/PN.Btm which resulted in the death of his partner due to the behavior of adherents of the sadomasochism.

Sadomasochistic behavior that occurs within the household is a form of sexual violence that is committed by hurting one or both parties, even though with the consent it is still prohibited in its implementation, let alone causing the loss of a life from one of the partners. Sadomasochistic behavior in the realm of human

rights is a form of violation, because in this case this behavior clearly already contains violence in it which is associated with torture. Torture in Article 1 point (4) of Law no. 39 of 1999 concerning Human Rights which in essence is an act that deliberately causes pain, both physically and spiritually (Rosida & Hariri, 2023). Through Law Number 5 of 1998 concerning Ratification of the Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment obliges every country that ratifies it to strengthen the protection of human rights and other basic freedoms (Deramayati & Prakarsa, 2021). This convention becomes a patent right that the prohibition against torture is a form of crime that does not only enter the national realm, but extends to the international realm.

Violations of human rights are defined as all acts of human rights violations committed either individually or in groups and institutions against human rights (Mastopo et al., 2018). This sadomasochistic act is a form of violation and crime in the form of violence and torture of a sexual partner, which in Human Rights is of course strictly prohibited. In the 1998 Rome Statute this sadomasochistic behavior is included in the category of crimes against humanity. Where as explained in the previous discussion, this sadomasochistic act contains elements of violence in it, in the form of torture and also sexual slavery which can be said to be a form of degrading human dignity in general and sadomasochistic victims in particular. Both in Indonesian positive law, Islamic law, and even international law prohibit torture behavior, especially in biological needs for personal pleasure. Article 33 (1) of the Human Rights Act also agrees with this, which states that every citizen has the right to be free from torture or cruel, inhumane, degrading and even human dignity. The perpetrators of human rights violations may be subject to sanctions in the form of criminal, civil and/or administrative sanctions in accordance with the provisions of the law. This law is a milestone as well as a legal umbrella for human rights.

Accountability for Sadomasochistic Behavior in Law Number 12 of 2022 concerning Crimes of Sexual Violence

The previous discussion discussed human rights views on the sadomasochistic behavior of married couples, and if it is related to positive criminal law, what form of accountability is based on Law Number 12 of 2022 concerning Crimes of Sexual Violence (TPKS Law). Accountability is defined as a form of consequence for the actions taken by the perpetrator for the actions taken (Yantzi, 2009). As mentioned in the previous discussion, sadomasochistic acts are activities that involve elements of sexual violence. Violence itself is defined as a criminal act of persecution which can refer to murder (Mundakir et al., 2022). Then as the law progresses, violence is also seen as a problem related to human rights (Juwita, 2016). The presence of the TPKS Law is a *lex specialis* of positive criminal law. The law exists as a legal umbrella in obtaining protection from all forms of violence and freedom from torture and treatment that is considered degrading to human dignity and status. The Indonesian state itself is committed to eliminating all forms of torture and inhumane treatment and discrimination against women, children and persons with disabilities.

The ratification of the TPKS Law is a form of the Indonesian state's commitment to providing guarantees for human rights as a whole, especially regarding violence and discrimination. After the ratification of this law, it must be

followed up so that this law can be implemented effectively and become legal certainty for every citizen in general and for women and children in particular (Nurmalasari & Waluyo, 2022). The TPKS Law is a legal umbrella for protecting and recovering victims, carrying out law enforcement and rehabilitating perpetrators of sexual violence, as well as creating an environment and ensuring that sexual violence does not recur, where this law contains rules regarding the prevention, handling and punishment of cases of sexual violence based on the victim's point of view (Harahap et al., 2023).

Referring to the TPKS Law, there are nine types of Crimes of Sexual Violence, specifically in Article 4 paragraph (1) including;

1. Non-physical sexual harassment;
2. Physical sexual harassment;
3. Forced contraception;
4. Forced sterilization;
5. Forced marriage;
6. Sexual abuse;
7. Sexual exploitation;
8. Sexual slavery; And
9. Electronic-based sexual violence.

Considering that in the previous discussion it was mentioned that sadomasochistic deviant behavior is part of sexual torture, it is included in the nine types of criminal acts of sexual violence contained in the TPKS Law. Bearing in mind that torture is part of human rights violations, this sadomasochistic actor is subject to criminal responsibility for his actions which harm other people. Moeljatno in the journal *Nurisman* (Nurisman, 2022) states that there are three main elements in criminal law policy. Among them include prohibited acts, criminal liability, and forms of punishment sanctioned against perpetrators of criminal acts. Criminal liability or criminal responsibility is defined as an obligation to correct actions or provide compensation for criminal acts committed by criminal offender (Shalsabila et al., 2022). In criminal liability, it must contain a subjective element in the form of a mistake in the form of intentional and negligent and an objective element, namely an act against the law (Bunga & Isnawati2, 2022).

Nowadays, the behavior of sexual violence in Indonesia continues to increase from year to year. This can be seen in the data quoted from the Women's Health Foundation, Komnas Perempuan noted that in 2014 there were cases of sexual violence against women and children with a total of 4,475 cases, 6,499 cases in 2015, 5,785 cases in 2016, and 2,979 cases in 2017. Then in 2020 there were a total of 17,642 cases of sexual crimes, including 6,093 cases physical violence, 5,829 psychological violence, and 7,551 sexual violence. Sadomasochistic behavior within the household is still common. One of them is a case that occurred in 2019 and was decided in the Batam District Court with the decision register number 32/Pid.B/2019/PN.Btm with the defendant whose initials AWA had sexual intercourse with her partner, whose initials SPK involved violence in intercourse before the death of the partner (Simanjutak, 2019).

Based on the judge's decision, it was proven that AWA had sexual relations with SPK using violence, namely by slapping the face, buttocks and pulling the hair of the SPK victim. Before having sexual intercourse, the couple consumed

methamphetamine. Then on another day the defendant and the victim had sexual intercourse again with the same pattern, but this time the perpetrator did it more forcefully because it was triggered by feelings of jealousy because during intercourse the SPK mentioned another man's name, namely by grabbing, hitting and slapping using his right hand and the left of the defendant approximately 10 (ten) times. And the next day the victim was found dead. The AWA defendant was subject to a prison sentence of 6 years.

In addition to the 9 total crimes of sexual violence mentioned in Article 4 paragraph (1), in the case of sexual violence in the household sphere it is contained in Article 4 paragraph (2h). Sadomasochistic behavior within the family sphere, the offender is subject to Article 6 with criminal liability plus one third as stated in Article 15 paragraph (1a). In the case of the defendant AWA, if referring to the TPKS Law, an additional penalty of one third is imposed for causing the victim to die (Article 15 (1o)). The criminal sanction imposed on the perpetrator is in the form of imprisonment for 4 years or more, fines, or other crimes according to the law, this is contained in Article 16 of the TPKS Law. Then in addition to criminal sanctions, perpetrators of sexual violence are also required to carry out rehabilitation, both medical rehabilitation and social rehabilitation (Article 17). Cases of criminal acts of sexual violence can only be resolved in court, unless the perpetrator of the violence is a child, then a diversionary settlement will be carried out (Article 23). Sadomasochistic behavior can be subject to this Law because in its implementation it commits physical sexual acts and places its partner under its control to commit sexual violence. This is absolutely not justified, either in positive law, Islamic law, and international law does not allow its people to commit acts of violence, both physical and mental violence in any form, and this cannot be resolved by means of non-litigation, except against child perpetrators. There is no country that legalizes acts of violence in its government, therefore this act of violence is prohibited even until a convention against violence is made by the United Nations which is then ratified by its member countries

CONCLUSION

In fulfilling sexual needs, not a few married couples engage in sadomasochistic behavior when having intercourse. Sadomasochism is a combination of sadism and sexual masochism involving 2 people or in the sense of a partner. It is called that because one of the couples has their respective roles, one of which acts as sadistic (gives pain) and the other acts as masochistic (accepts pain). Sadomasochistic behavior in the realm of human rights is a form of violation, because in this case this behavior clearly already contains violence in it which is associated with torture. Torture in Article 1 number (4) of the Human Rights Law, which in essence is an act that deliberately causes pain, both physically and spiritually. Criminal liability is defined as an obligation to correct actions or provide compensation for criminal acts committed by criminal offenders.

Criminal liability must contain a subjective element in the form of a mistake in the form of intentional and negligent and an objective element, namely an act against the law. Accountability for sadomasochistic behavior based on the TPKS Law is contained in articles including Article 6, Article 15, and Article 17. This

behavior can certainly be subject to the TPKS Law because in its implementation it commits physical sexual acts and places its partner under its control to commit sexual violence. This is absolutely not justified, because according to applicable law, violence in any form is not permitted. And this cannot be resolved by means of non-litigation, except against child perpetrators.

REFERENCES

- Akmaliya, R. A., Rosida, I. A., Permatadani, E., Amelia, S., & Irawan, A. D. (2023). Implementasi Perjanjian Internasional dalam Penyelesaian Sengketa Batas Laut Zona Ekonomi Eksklusif antara Indonesia dan Vietnam. *Yustisia Tirtayasa: Jurnal Tugas Akhir*, 3(1), 1-17.
- Anisaningtyas, G., & Astuti, Y. D. (2011). Pernikahan Di Kalangan Mahasiswa S-1. *Proyeksi*, 6(2), 21. <https://doi.org/10.30659/p.6.2.21-33>
- Bunga, D. L., & Isnawati, M. (2022). Pertanggungjawaban Pidana TNI dalam Tindak Pidana Penganiayaan Berat. *Widya Yuridika: Jurnal Hukum*, 5(1), 127-138.
- Covid-, P., Irawan, A. D., Samudra, K. P., & Pratama, A. (2021). *Perlindungan Hak Asasi Manusia oleh Pemerintah pada Masa*. 1(1), 1-6.
- Daud, F. K. (2016). Parafilia: Nature Atau Nurture? Tinjauan Teologis Dan Psikologis. *Al-A'raf: Jurnal Pemikiran Islam Dan Filsafat*, 13(2), 283-311.
- Deramayati, T. Y., & Prakarsa, S. U. W. (2021). Peradilan In Absentia Dalam Tindak Pidana Korupsi Dan Hak Pembelaan Terdakwa Dalam Perspektif HAM. *Jurnal Komunikasi Hukum (JKH)*, 7(2), 570-591.
- Detiknews. (2021). *Suami Saya Suka Nyudut Rokok Saat Bercinta/Sadomasokis, apakah Diperbolehkan?* Detiknews.
- Halgin, R. P. (2007). *Abnormal Psychology: Clinical Perspectives On Psychological Disorders*. McGraw-Hill.
- Harahap, M., Pratitis, S. A., & Rehulina. (2023). Perlindungan Hukum Terhadap Hak-Hak Korban Kejahatan Seksual Berdasarkan Undang-Undang Nomor 12 Tahun 2022 Tentang Tindak Pidana Kekerasan Seksual. *ARBITER: Jurnal Ilmiah Magister Hukum*, 5(1), 53-68. <https://doi.org/10.31289/arbiterv5i1.1723>
- Juanda, & Eveline, S. (2018). Membangun Komunikasi Suami Istri Sebagai Sarana Keharmonisan Keluarga. *Kerusso*, 2(1), 1-7.
- Juwita, D. R. (2016). Pemberlakuan Hukum Syariat Bagi Warga Non Muslim di Daerah Nangroe Aceh Darussalam (Perspektif Islam dan HAM). *El-Wasathiyah: Jurnal Studi Agama*, 4(1), 23-38.
- Mastopo, O. S., Muliadi, & Achmad, A. N. I. (2018). *Hukum Dan Hak Asasi Manusia*. Intras Publishing.
- Menguak Data Jumlah Kekerasan Perempuan Tahun ke Tahun*. (2018). Yayasan Kesehatan Perempuan.
- Mundakir, Qur'aniati, N., Junaidi, Arsad, & Salam, S. (2022). *Kekerasan Seksual Dalam Perspektif Transdisipliner*. UMSurabaya Publishing.
- Na'im, M. A. (2018). *Tinjauan Hukum Keluarga Islam tentang Perilaku Sadomasokisme*. Universitas Islam Negeri Walisongo Semarang.
- Nandita, S., & Batubara, G. T. (2023). Pertanggungjawaban Pidana terhadap Pelaku Sadomasokisme sebagai Perilaku Penyimpangan Seksual dalam

- Prespektif Hukum Pidana. *Jurnal Hukum Samudra Keadilan*, 18(2023), 53–67.
- Nasyuha, A. H. (2020). Sistem Pakar Mendiagnosa Kelainan Orientasi Seksual pada Orang Dewasa Menggunakan Metode Case Based Reasoning (CBR). *Device: Journal of Information System, Computer Science and Information Technology*, 1(1), 1–5.
- Ngazizah, I. F., & Fatmawati, M. U. (2020). Sadomasokisme di Indonesia Persepektif HAM dan Hukum Pidana. *Tawazun: Journal of Sharia Economic Law*, 3(2), 171–188.
- Nugroho, P. S., & Akbar, M. (2020). Sistem Pakar Diagnosa Gangguan Kelainan Seks Pada Pria Menggunakan Teorema Bayes Expert System for Diagnosing Sex Disorders in Males Using Bayes' Theorem. *Seminar Multimedia & Artificial Intelligence*, 3, 138–146.
- Nurisman, E. (2022). Risalah Tantangan Penegakan Hukum Tindak Pidana Kekerasan Seksual Pasca Lahirnya Undang-Undang Nomor 12 Tahun 2022. *Jurnal Pembangunan Hukum Indonesia*, 4(2), 170–196. <https://doi.org/10.14710/jphi.v4i2.170-196>
- Nurmalasari, N. C., & Waluyo. (2022). Efektivitas Undang-Undang Tindak Pidana Kekerasan Seksual Di Indonesia. *Sovereignty*, 1(1), 57–67.
- Rohwanto, M. P., & Suhartono. (2021). Persuasi dalam Wacana Scene Kaum Sadomasokis. *Bapala*, 8(05), 208–222.
- Rosida, I. A., Akmalia, R. A., Amelia, S., Permatadani, E., & Irawan, A. D. (2023). The Principle of Non-Drscrimination As A Form of Protection for Underage Children Victims of Narcotics and Psychotropic Crimes. *Replika Jurnal Hukum*, 11(1), 39–52.
- Rosida, I. A., & Hariri, A. (2023). Pemberlakuan Sanksi Cambuk , Qanun Jinayat di Aceh dalam Perspektif Hak Asasi Manusia. 4(2), 115–129.
- Sakinah, Q. N. (2021). *Praktik Sadomasokisme pada Masyarakat Muslim Perspektif Hak Asasi Manusia*. Institut Agama Islam Negeri Purwokerto.
- Samsul Arifin. (2021). Pertanggungjawaban Pidana Terhadap Anak Sebagai Kurir Narkotika. *Justitia Jurnal Hukum*, 5(1), 138. <https://doi.org/http://dx.doi.org/10.30651/justitia.v6i1.8225>
- Santika, E. F. (2023). *Kekerasan Seksual Jadi Jenis yang Paling Banyak Dialami Korban Sepanjang 2022*. Databoks.
- Shalsabila, D., Djatmiko, A., Ihsan, A. Y., & Isnawati, M. (2022). *Kekuatan Pembuktian Rekam Medis Sebagai Alat Bukti dalam Perkara Pidana*. 1(1), 1–9.
- Simanjutak, N. (2019). *Gunakan Sabu Sambil Hubungan Sex, Terdakwa Andana Wisnu Bunuh Istri Sirihnya*. Telisiknews.Com.
- Srajesh, R. (2021). "Penyimpangan Perilaku Seks Sadisme oleh Dominance terhadap Submisif didalam Praktek Bondage Domination Submission Sadism Masochism (BDSM)" (Study Kasus Dominance Mr X teradap Submisif Ny Y Di Pekanbaru). Universitas Islam Riau Pekanbaru.
- Wadjo, H. Z., & Saimima, J. M. (2021). Perlindungan Hukum Terhadap Korban Kekerasan Seksual Dalam Rangka Mewujudkan Keadilan Restoratif. *Jurnal Belo*, 6(1), 48–59.
- Yantzi, M. (2009). *Kekerasan Seksual & Pemulihan*. Gunung Mulia.