

The Role of Forensic Autopsy in Pursuit of Material Truth in Optical Evidence for Negative Legal Proof in the Cyanide Coffee Murder Case

Belly Isnaeni

Universitas Pamulang, Indonesia

Correspondent: dosen02637@unpam.ac.id

Received : December 31, 2023

Accepted : January 19, 2024

Published : February 28, 2024

Citation: Isnaeni, B. (2024). The Role of Forensic Autopsy in Pursuit of Material Truth in Optical Evidence for Negative Legal Proof in the Cyanide Coffee Murder Case. *Sinergi International Journal of Law*, 2(1), 61-71.

ABSTRACT: Conducting criminal investigations in Murder cases sometimes faces challenges in obtaining the family's consent for the victim's autopsy. This difficulty arises due to issues related to the victim's religious beliefs, which prohibit the autopsy of murder victims. The autopsy process by the investigative authorities encounters internal obstacles due to limited government funding for the autopsy process. The problem in this research is that, since no autopsy was conducted on Mirna's body, the cause of death remains unknown to establish material truth. The police can compel an autopsy based on Article 134, paragraph (1) of the Criminal Procedure Code, which includes the phrase "when it is highly necessary, and for the purpose of proving, a body autopsy cannot be avoided." Looking at this phrase, whether an autopsy is performed on murder victims is within the investigator's authority and based on the investigator's subjective considerations.

Keywords: Role of Autopsy, Material Truth, Cyanide Coffee



This is an open access article under the CC-BY 4.0 license

INTRODUCTION

Homicide is considered a significant form of crime that draws considerable attention within society. In daily life, we often witness phenomena related to murder, whether reported through electronic or print media. Murder is an inhumane crime, as it results in the loss of another person's life, whether intentional or unintentional. Premeditated murder, referred to as "moord" or abbreviated as planned murder by lawmakers, is the most severe form of criminal offense against human life, carrying the highest penalty among all crimes of this nature (Gobel, 2016).

In the realm of homicide, it is commonly observed that several articles, such as Article 338, 339, and 340 of the Criminal Code, are frequently invoked, thereby delineating different forms of murder. The nature of murder always introduces a mystery surrounding its motives and objectives. In society, it is well-known that the deceased cannot speak, giving rise to the saying that "the dead cannot talk." Therefore, law enforcement must seek valid evidence to uncover the reasons behind a murder. One scientific method commonly employed to investigate a murder systematically is

The Role of Forensic Autopsy in Pursuit of Material Truth in Optical Evidence for Negative Legal Proof in the Cyanide Coffee Murder Case

Isnaeni

through conducting an autopsy on the victim or the deceased (Cao et al., 2022; Chen et al., 2023; Das et al., 2022).

According to Kastubi (Kastubi, 2016), the importance of a post-mortem autopsy is to conduct an investigation or examination of a corpse, including its internal organs and structures. Through this surgical procedure, the goal is to determine the cause of someone's death, both for medical knowledge and to unravel the mystery of a criminal act being scrutinized in the courtroom. The involvement of an expert is deemed crucial in the process of examining criminal cases. An expert plays a vital role in aiding the relevant law enforcement authorities by shedding light on a criminal case. This involves gathering evidence pertinent to their field of expertise, providing stronger and more insightful clues regarding the identity of the perpetrator, and assisting the judge in making informed and fair decisions concerning the case under scrutiny (Dhoble et al., 2022).

The autopsy, or post-mortem surgery, is well-known in the medical field and is generally understood as a surgical procedure on the body of a deceased human. According to the Medical Dictionary, an autopsy is a postmortem examination of a corpse to determine the cause of death or the nature of pathological changes, also known as a necropsy (Danis, 2009). Forensic autopsy is a method employed to discover the exact cause of someone's death, and it is only through forensic autopsy that the precise cause of death can be uncovered and determined (Ohoiwutun, 2016).

The death of a victim caused by the violent actions of others or occurring naturally (natural death) can be determined through forensic autopsy. This is where the significant and strategic role of forensic autopsy lies. It not only aims to uncover the cause of someone's death, but from a criminal law perspective, the role of forensic autopsy is also associated with determining the culpability of the defendant. The causal relationship between the defendant's actions and the consequence of the victim's death becomes a parameter in establishing the defendant's guilt, correlating with criminal responsibility (Widowati, 2021).

In relation to criminal responsibility, the murder case involving Jessica Kumala Wongso, which gained widespread attention in 2016, is noteworthy. In this case, the poisoning incident with cyanide-laced coffee resulted in the conviction of Jessica Kumala Wongso for the death of Wayan Mirna Salihin, with a sentence of 20 years in prison. Several peculiarities in the case began to surface in the public eye after the release of a documentary titled "Ice Cold: Murder, Coffee, and Jessica Wongso" by Netflix Indonesia.

One of the anomalies highlighted was the fact that Mirna's body was never subjected to autopsy (suara.com, 2023), a revelation made by forensic doctor Dr. Slamet Purnomo from Sukanto Hospital, Indonesian National Police Headquarters. During the trial of Jessica's case seven years ago, Slamet disclosed that they indeed did not perform an autopsy on Mirna, who had succumbed to cyanide poisoning. "Autopsy on Mirna was not conducted," stated Slamet during his testimony at the Central Jakarta District Court.

The increasing complexity of case resolution undoubtedly requires precise pieces of evidence; hence, forensic science plays a crucial role in proving criminal cases related to assault, murder,

The Role of Forensic Autopsy in Pursuit of Material Truth in Optical Evidence for Negative Legal Proof in the Cyanide Coffee Murder Case

Isnaeni

rape, and drug offenses, especially in high-profile cases that capture public attention. The role of forensic experts is essential in various stages, including investigation, inquiry, prosecution, and examination during court proceedings.

The benefits of forensic science in criminal law enforcement are centered around discovering truth and justice, both in recent cases and long-standing ones. It is crucial to emphasize that forensics serves as a means to obtain evidence or tools for acquiring evidence, rather than being the evidence itself. Therefore, this study aims to explore the role of autopsy in revealing criminal acts of murder in the pursuit of material truth for negative legal proof, particularly in the high-profile case of cyanide-laced coffee murder, which has captured public attention. The research also seeks to determine whether conducting an autopsy is an investigator's obligation without obtaining permission from the victim's family.

METHOD

Research method is a scientific approach employed to gather valid data with the aim of discovering, developing, and proving a specific knowledge, so it can be used to understand, solve, and anticipate problems. In this context, scientific research requires a relevant and suitable approach for the case under investigation. The chosen research type is normative research, which involves collecting data from literature or secondary sources (Sugiono, 2016).

The research materials encompass primary legal sources, such as the Criminal Code (KUHP), the Criminal Procedure Code (KUHAP), Law No. 48 of 2009 regarding the Judiciary, and Health Law No. 30 of 2009. This study uses a normative case study to analyze legal behavior (Tanzeh, 2009). The main focus of this research is law conceptualized as norms or rules applicable in society, serving as a reference for individual behavior (Kadir, 2004).

Normative research in this context is also employed to examine the crucial role of forensic autopsy in uncovering the cyanide coffee murder case, which has garnered public attention (Marzuki, 2005). The research also seeks to assess the accountability of forensic doctors conducting autopsies with the goal of analyzing whether there are attempts to engineer the case in the context of criminal murder.

RESULT AND DISCUSSION

1. Criminal Act of Homicide and Its Qualifications

Regarding the crime of murder, according to Lamintang, intentionally taking the life of another person requires the perpetrator to do something or a series of actions that result in the death of another person, with the condition that the perpetrator's intent is directed towards the consequence of the person's death. Intent creates the consequence of the unwanted death of another person, which is not sanctioned by the law. The occurrence of a prohibited or unintended

The Role of Forensic Autopsy in Pursuit of Material Truth in Optical Evidence for Negative Legal Proof in the Cyanide Coffee Murder Case

Isnaeni

consequence under the law is when the offense is considered complete, falling within the realm of a material offense (Lamintang, 2018).

Consistent with Lamintang's opinion, Chairul Huda also explains that murder is an action or deed resulting in the loss of someone's life, whether it violates the law or not. The criminal act of murder is a material offense, as described by Van Hamel, also known as a *delict met materiele omschrijving*, which means the offense is formulated materially, and it is considered completed when the prohibited or unintended consequence, as dictated by the law, occurs (Huda, 2008).

Therefore, the definition of murder is a process of deprivation, elimination, or taking away someone's life carried out by another person. The concept of the process in this context encompasses a broad understanding, involving all factors that contribute to the occurrence of murder, whether directly or indirectly involved.

Murder is an act that results in the loss of someone's life due to the intentional act of taking that life. In the Criminal Code (KUHP), it is explained as a crime against a person's life, known as "*mabar mati*" or murder (*doorslag*) (Marentej, 2019). According to what the author wants to investigate, the perpetrator of murder (*doorslag*) is punishable by imprisonment for a maximum of fifteen years (Article 338 of the Criminal Code). If the murder is premeditated, it is referred to as planned murder, which is punishable by imprisonment for a specified period of up to twenty years, life imprisonment, or the death penalty (Article 340 of the Criminal Code).

Meanwhile, Fiona Brookman classifies murder into four categories (Hariyanto, 2014):

- a. When Men Kill: Encompasses murders committed by men against other men and murders by men against women.
- b. When Women Kill: Involves murders committed by women against their partners.
- c. The Killing of Children and Infants: In this category, murders include those committed by parents, relatives, or family members against children and infants, as well as murders by strangers against children. This category also considers murders of infants aged less than 24 hours post-birth or murders of children at the age of 12 months.
- d. Multiple Homicide: 'Serial Killers' and 'Terrorists': This category includes murders committed by one or more individuals resulting in the deaths of many people, either in a single event or as part of a series of events over a specific period. These types of murders are commonly associated with acts of terrorism.

According to the Indonesian Criminal Code (KUHP), crimes against human life committed intentionally are classified or qualified as various forms of murder, including (Chazawi, 2019):

- a. Ordinary murder in its basic form (*doorslag*, Article 338 KUHP);
- b. Murder followed, accompanied, or preceded by another criminal act (Article 339 KUHP);

The Role of Forensic Autopsy in Pursuit of Material Truth in Optical Evidence for Negative Legal Proof in the Cyanide Coffee Murder Case

Isnaeni

- c. Premeditated murder (moord, Article 340 KUHP);
- d. Maternal murder of an infant at or shortly after birth (Article 341, 342, and 343 KUHP);
- e. Murder upon the victim's request (Article 344 KUHP);
- f. Encouraging and assisting suicide (Article 345 KUHP) g) Abortion and murder of a fetus (Articles 346 to 349 KUHP)

The murder case related to this research is the Jessica Wongso case. The first meeting between Jessica and Mirna took place on December 12, 2015. At that time, Mirna invited her husband to meet Jessica at a restaurant. This initial meeting progressed to a second meeting at Restaurant Olivier. According to Jessica, Mirna had chosen Restaurant Olivier. Upon arriving in Indonesia from Australia, Jessica claimed to be unfamiliar with many coffee locations in Jakarta.

During the second meeting at Restaurant Olivier, Jessica arrived early, two hours before the agreed-upon time. According to police records, Jessica ordered Vietnamese iced coffee as per Mirna's request, along with cocktails and a fashioned fazerac for herself and Hani. Unfortunately, the Vietnamese iced coffee Jessica ordered contained three grams of cyanide, ultimately resulting in Mirna's death. The forensic laboratory test results from the Indonesian National Police Headquarters stated that "the coffee had been laced with three grams of cyanide, a dosage sufficient to kill five people at once." (CNNIndonesia, 2016).

2. Forensic Autopsy, Its Types, and Regulations

In medical terminology, autopsy or post-mortem surgery refers to an investigation or examination of a deceased body, including its organs and internal structures, conducted through dissection. The purpose of this procedure is to determine the cause of a person's death, serving both medical research purposes and unveiling the mysteries surrounding a criminal act (Kusuma, 2012).

Forensic autopsy, or medico-legal autopsy, is the examination of a body for legal purposes based on an official order, typically in the context of a criminal investigation. This procedure is conducted to serve the interests of the justice system when an event is suspected to be a criminal act. The method of conducting forensic autopsy is not significantly different from clinical autopsies.

Forensic autopsies are not limited to hospital settings; they may be performed at the scene of the incident or at the location where the body is buried (such as a public cemetery), especially if it is not feasible to transport the body to a hospital.

As for those authorized to request forensic autopsy, they include: 1) Investigators (Code of Criminal Procedure 133, 134, 135). 2) Criminal Judges (Code of Criminal Procedure 180).

From the perspective of purpose and objectives, forensic autopsy can be categorized into three groups (Kastubi, 2016):

The Role of Forensic Autopsy in Pursuit of Material Truth in Optical Evidence for Negative Legal Proof in the Cyanide Coffee Murder Case

Isnaeni

- a. Educational Forensic Autopsy: This involves dissecting a body with the aim of applying theories learned by medical students or other health learners as practical material for the study of the human body (anatomy). In the medical field, this practice is conducted to understand the intricacies of human organ systems, allowing for the detection of abnormal or diseased organs for early intervention. It is also used to determine the cause of death, particularly in the context of the increasing prevalence of criminal activities today.
- b. Scientific Forensic Autopsy: This type of autopsy is performed on bodies that have received sufficient medical care in hospitals. Through this procedure, doctors can identify the diseases that led to the deceased person's death. This information can be crucial in the case of potential outbreaks, enabling prompt preventive measures for public well-being.
- c. Judicial (Forensic) Forensic Autopsy: This forensic autopsy aims to seek legal truth in an event, such as suspected murder, suicide, or accidents. It is typically conducted at the request of law enforcement or the judiciary to ascertain the cause of a person's death. For example, in cases of criminal activities or natural deaths, a forensic autopsy, often accompanied by a medico-legal report (V.e.T), can reveal the true cause of death, influencing a judge's decision in determining the appropriate punishment.

Meanwhile, regarding the regulations on autopsy, there are several rules, including:

- a. Regulations on Autopsy according to Health Law No. 36 of 2009 Article 118 contain procedures for requesting an autopsy. In this article, it is explained that if an unidentified corpse is found, efforts for identification requested by the investigator need to be carried out. Article 119 addresses the development of health services, where clinical autopsies can be conducted in hospitals. It then explains the purpose of clinical autopsy, the procedural aspects of autopsies, and emphasizes the significance of clinical autopsies for diagnosing and determining the cause of death, which must be carried out. Article 121 specifies that the authority to perform autopsies lies with doctors in accordance with their expertise and authority. Furthermore, it explains that if during clinical and anatomical autopsies there is suspicion of a criminal act, the doctor conducting the autopsy has the right to report it to the investigator. Article 122 pertains to forensic autopsies for law enforcement purposes, allowing forensic autopsies to be conducted by forensic doctors, and the execution must take place in the forensic installation at the respective hospital. The article also specifies that the local government is responsible for providing forensic autopsy services in its area. Article 124 outlines that the actions of autopsy performed by healthcare professionals must adhere to religious, moral, and professional ethical norms.
- b. Regulations on Autopsy according to the Indonesian Criminal Procedure Code (KUHP) Article 133 detail the procedure for requesting an autopsy. In this context, the investigator, for judicial purposes in handling deceased victims suspected of a criminal act, is authorized to submit a request for expert testimony to forensic medical experts or other experts. Requests for forensic medical expert testimony must be made in writing, and the corpse sent to the hospital for autopsy must be labeled with its identity. Article 134 outlines the procedure for obtaining permission from the family of the deceased for the autopsy. It

stipulates that before conducting the autopsy, the investigator is obliged to explain clearly the purpose and objectives of the procedure. If the informed family cannot be found, the investigator will proceed with the autopsy to determine the cause of death. Article 135 addresses the exhumation of corpses, emphasizing that for judicial purposes, exhumation is necessary to determine the cause of death for an individual.

Regarding the case that requires forensic autopsy in this study, based solely on the results of the Indonesian National Police Forensic Laboratory examination mentioned above, Toxicology Expert Nursamran Subandi concluded that Cyanide (NaCN) is corrosive to exposed materials. The amount of Cyanide (NaCN) in the Vietnamese iced coffee consumed by the victim Wayan Mirna Salihin was approximately ± 298 mg, significantly exceeding the lethal dose (LD₅₀) of Cyanide (NaCN) for a human weighing 60 kg, which is only 171.42 mg. Based on this, Dr. Arief Wahyono, Sp.F, and Dr. Slamet Poernomo, Sp.F, DFM, as Forensic Medical Experts who conducted the Post-mortem Examination Report (VeR) on the victim Wayan Mirna Salihin, concluded that the cause of death was due to Cyanide (NaCN) in an amount far greater than the lethal dose (LD₅₀), causing erosion in the stomach.

3. The Role of Forensic Autopsy in Seeking Material Truth Optical Negative Evidence in the Case of Cyanide Coffee Murder

In the context of criminal procedural law, a fundamental principle is to seek material truth. To uncover material truth, the act of proving is essential. Therefore, the function of evidence is paramount and central to the criminal case examination process.

This is consistent with Negative Legal Proof (*Negatief Wettelijke Bewijstheorie*) in the legal context, which is a combined system of positive legal proof and the belief system of the judge. This proof system represents a balance between two opposing systems. The conclusion of a defendant's guilt is determined by the judge's belief based on valid legal evidence. Legal conviction must also be based on valid legal evidence.

In criminal law, according to M. Yahya Harahap, "the panel of judges, in seeking and establishing the truth in their verdict, must rely on evidence stipulated by the law in a restrictive manner, as mentioned in Article 184 of the Criminal Procedure Code (KUHAP)." The proof is an effort to demonstrate the alleged wrongdoing. In other words, it serves to establish the truth of an accusation. Proof is also a provision that regulates admissible evidence according to the law for judges to use in proving the alleged offense.

The Criminal Procedure Code (KUHAP) has a restrictive nature of evidence, meaning that the matters to be proven are limited to those regulated within the KUHAP itself. Similarly, in the manner of utilizing and assessing the strength of evidence inherent in each proof, it can only be done within the limits allowed by the law. This is done to ensure that in realizing the intended truth, the panel of judges avoids sacrificing the truth that must be justified. It is essential not to let the truth manifested in the verdict be the result obtained outside the boundaries justified in the proof system, so that the judgment is not based on the feelings and subjective opinions of the judge, as stipulated in Article 183 of the KUHAP, which states:

The Role of Forensic Autopsy in Pursuit of Material Truth in Optical Evidence for Negative Legal Proof in the Cyanide Coffee Murder Case

Isnaeni

"A judge may not impose a sentence on an individual unless, with at least two pieces of valid evidence, they are convinced that a criminal act has indeed occurred and that the accused is guilty of committing it."

Regarding the evidence in the murder case involving the defendant Jessica Wongso, commonly known as the cyanide coffee case, we can understand it from a legal perspective. Jessica is accused of committing murder by poisoning Wayan Mirna Salihin with cyanide powder. The conclusion drawn from the victim's autopsy is that the cause of Wayan Mirna Salihin's death is the significantly higher amount of cyanide (NaCN) than the lethal dose (LD₅₀), resulting in erosion in her stomach.

Upon careful examination, as the suspicion involves the presence of cyanide poison in the victim's body, it is appropriate to conduct forensic autopsy on the deceased. The judge must obtain conviction based on two valid pieces of evidence. In this case, the evidence in question is the testimony of forensic experts. Why is that? Because forensic doctors are the ones entitled and authorized to determine the cause of death after performing the autopsy procedure. However, in the present case, the forensic expert provided testimony stating that no autopsy was conducted on Mirna's remains, hence the cause of death remains unknown.

Here lies the role and function of forensic autopsy in clarifying the victim's death, where autopsy serves as one of the valid pieces of evidence (*corpus delicti*) in court since the evidence itself has transformed during the trial. Thus, autopsy is a valid piece of evidence as it falls under the category of a legitimate document according to the Criminal Procedure Code (KUHAP) Article 184. There are five valid pieces of evidence according to KUHAP Article 184 paragraph, namely:

- a. Witness testimony
- b. Expert testimony
- c. Documents
- d. Instructions
- e. Defendant's statement
- f. Additionally, an autopsy is conducted upon the request of an investigator in connection with the investigation of a case.

Furthermore, an autopsy is conducted at the request of an investigator in connection with the investigation of a case. The results of the examination are objective findings on the victim, obtained through medical examination, which will be used for three purposes:

- a. Providing evidence through the *Visum et Repertum* report to the judge.
- b. Drawing conclusions based on the cause-and-effect relationship.

The Role of Forensic Autopsy in Pursuit of Material Truth in Optical Evidence for Negative Legal Proof in the Cyanide Coffee Murder Case

Isnaeni

- c. Allowing the judge to summon other medical experts to form a newer autopsy conclusion if the autopsy fails to clarify issues in the court proceedings. The judge can request expert testimony or the submission of new evidence, as stipulated in the Criminal Procedure Code (KUHAP), which provides the possibility of re-examining or researching evidence if there are valid objections from the defendant or their legal counsel against a certain examination result.

This is also consistent with the opinions of Ketut Murtika and Djoko Prokoso regarding the purposes of dissecting a corpse or autopsy, of which there are several types, but the most common are:

- a. To determine the cause of death during criminal acts. For this purpose, a doctor performs an autopsy on the deceased to ascertain the cause of death, whether it occurred naturally or due to criminal actions.
- b. To identify the general cause of death. Through this autopsy, a doctor can identify the diseases that caused the death of the deceased. If it is a contagious disease and there is a concern about its spread, preventive measures are taken immediately for safety.
- c. Medical science practice autopsy. This type of autopsy is carried out by medical school students to understand the intricacies of the human body's organs. It is crucial for accurate identification of diseases in the body's organs.

Therefore, autopsy is a crucial element in the process of evidence because it entirely replaces *Corpus Delicti* (evidence). As known in a criminal case involving harm to the body, health, and loss of human life, the victim's body constitutes *Corpus Delicti*. Hence, *Corpus Delicti* of this nature is impossible to provide or present in a court hearing and must be replaced entirely by the results of the autopsy (*Visum et Repertum*). The role of a doctor in handling crime victims by issuing autopsy results should be acknowledged and guaranteed for its neutrality because the assistance of the medical profession significantly determines the presence of truth.

CONCLUSION

Based on the above presentation, the following conclusions can be drawn: the crucial role of forensic autopsy in revealing the case of seeking material truth and supporting negative *wettelijk* evidence in the case of the cyanide coffee murder has attracted public attention. It is appropriate to use forensic autopsy to ensure that forensic doctors, who have the authority, determine the cause of the victim's death after the autopsy procedure. However, in the present case, forensic medicine experts themselves provided information that because an autopsy was not performed on Mirna's body, the cause of her death cannot be determined to obtain material truth.

In this context, the police have the authority to force an autopsy, as stipulated in Article 134 paragraph (1) of the Criminal Procedure Code, which states, "in cases where it is very necessary

The Role of Forensic Autopsy in Pursuit of Material Truth in Optical Evidence for Negative Legal Proof in the Cyanide Coffee Murder Case

Isnaeni

and unavoidable for the purpose of autopsy evidence...". Looking at this phrase, it gives the investigator the authority to decide whether an autopsy is necessary, and this decision is based on the subjective considerations of the investigator.

Therefore, to ensure material truth and support negative wettelijk evidence, effective steps, including conducting forensic autopsies, should be taken. The decision on the necessity of an autopsy should be based on the principles of objectivity and the need for evidence in revealing material truth in the case.

REFERENCE

- Cao, Y., Huang, M.-Y., Mao, C.-H., Wang, X., Xu, Y.-Y., Qian, X.-J., Ma, C., Qiu, W.-Y., & Zhu, Y.-C. (2022). Arteriosclerosis differs from venular collagenosis in relation to cerebrovascular parenchymal damages: An autopsy-based study. *Stroke and Vascular Neurology*, 8(4), 267–275. <https://doi.org/10.1136/svn-2022-001924>
- Chen, M., Burke, S., Olm, C. A., Irwin, D. J., Massimo, L., Lee, E. B., Trojanowski, J. Q., Gee, J. C., & Grossman, M. (2023). Antemortem network analysis of spreading pathology in autopsy-confirmed frontotemporal degeneration. *Brain Communications*, 5(3). <https://doi.org/10.1093/braincomms/fcad147>
- Das, S., Neithiya, T., Nirmal Kumar, E. S., Chaudhari, V. A., & Srinivas, B. H. (2022). INTERNET GAMING-RELATED SUDDEN DEATH - AN AUTOPSY-BASED CASE REPORT. *Journal of Forensic Medicine and Toxicology*, 39(2), 130–133. <https://doi.org/10.5958/0974-4568.2022.00051.5>
- Dhoble, S. V, Dhoble, S. S., Ramteke, B. W., Dhawane, S. G., & Tumram, N. K. (2022). Knowledge, Attitude & Perception of 2nd year Medical students about Medicolegal Autopsy. *Journal of Forensic Medicine Science and Law*, 31(2), 50–55. <https://www.scopus.com/inward/record.uri?eid=2-s2.0-85158156459&partnerID=40&md5=6cf5314f2b7baf7cf07f1a08ed74d31>
- Chazawi, Adami, (2019), *Kejahatan Terhadap Tubuh Dan Nyawa*, Rajawali Pers, Depok.
- Danis, Difa, (2009), *Kamus Istilah Kedokteran First Editon*, Gitamedia Press, Jakarta.
- Explanation in Supreme Court Decision No: 498/K/Pid/2017, pages 83-85.
- Gobel ,Vijay F.M.I, (2016), “Bedah Mayat Dalam Mengungkap Tindak Pidana Pembunuhan Menurut Pasal 134 KUHAP”, *Lex Administratum*, Fakultas Hukum Unsrat, Vol. 4(3).
- Hariyanto, Eko, (2014), *Memahami Pembunuhan*, PT Kompas Media Nusantara, Jakarta.
- Huda, Chairul, (2008), *Dari Tiada Pidanatanpa Kesalahan Menuju Kepada Tiada Pertanggungjawaban Pidana Tanpa Kesalahan*, Jakarta, Prenada.
- Kadir, Abdul, (2004), *Hukum dan Penelitian Hukum*, PT. Citra Aditya Bakti, Bandung.

The Role of Forensic Autopsy in Pursuit of Material Truth in Optical Evidence for Negative Legal Proof in the Cyanide Coffee Murder Case

Isnaeni

- Kastubi, (2016), "Fungsi Bedah Mayat Forensik (Autopsi) Untuk Mencari Kebenaran Materiil dalam Suatu Tindak Pidana," *Jurnal Spektrum Hukum*, Vol. 13(1).
- Kusuma, M. Soekry Erfan, at. all. (2012), *Ilmu Kedokteran Forensik Dan Medikolegal*, (Surabaya: Fakultas Kedokteran Universitas Airlangga).
- Lamintang, P.A.F., & Lamintang, Theo, (2018), *Kejahatan Terhadap Nyawa, Tubuh, Dan Kesehatan*, Cetakan Kedua, Sinar Grafika, Jakarta.
- Marentek, Junior Imanuel, (2019), *Pertanggungjawaban Pidana Pelaku Tindak Pidana Pembunuhan Berencana Ditinjau Dari Pasal 340 KUHP*. *Jurnal hukum Lex Crimen* Vol. 8(11).
- Marzuki, Peter Mahmud, (2005), *Penelitian Hukum*, Kencana Prenada Media Group, Jakarta.
- Murtika, I Ketut & Prakoso, Djoko, (1992), *Dasar-Dasar Ilmu Kedokteran Kehakiman*, Rineka Cipta, Jakarta.
- Ohoiwutun, Y.A. Triana, 2016, *Ilmu Kedokteran Forensik Interaksi Dan Dependensi Hukum Pada Ilmu Kedokteran First Edition*, Pohon Cahaya, Yogyakarta.
- Sugiyono, (2016), *Metode Penelitian Kuantitatif, Kualitatif dan R&D*, Afabeta, Bandung.
- Tanzeh, Ahmad, (2009), *Pengantar Metode Penelitian*, Teras, Yogyakarta.
- The Law Book on Health and Medicine*, (2012), Yogyakarta: Buku Biru.
- Tim Redaksi, (2014), *The Criminal Procedure Code*, Yogyakarta: Certe Posse.
- Widowati, at. all, (2021), *Peranan Autopsi Forensik dan Korelasinya Dengan Kasus Kematian Tidak Wajar*, Vol. 6(1).
- CNN Indonesia, *Kronologi Kasus Mirna Hingga Penahanan Jessica*.
<https://www.cnnindonesia.com/Nasional/2016>.
- <https://Dewi37lovelight.wordpress.com/2011/02/10/Peran-Visum-Et-Repertum-Dalam-Penyidikan-Tindak-PidanaDi-Indonesia-Beserta-Hambatan-Yang-Ditimbulkannya>
- <https://www.suara.com/Lifestyle/2023/10/04/174100/Ternyata-Ini-Alasan-Jenazah-Mirna-Tak-Diautopsi-Tapi-Jessica-Wongso-Bisa-Divonis-20-Tahun-Penjara> Accessed on January 8, 2023.