

Financial Exploitation by Spouse, a Crime in Private Space: An Overview based on Indonesian Legal System

Rahel Octora ^a and Fauzan Hanif M. ^b

Faculty of Law, Maranatha Christian University, Jl.Surya Sumantri 65, Bandung, Indonesia

Keywords: Financial Exploitation, Crime, Private Space.

Abstract: Family is the smallest organization in the social structure. Family resilience affects community resilience and sustainability. An event that may disrupt family resilience is domestic violence, which from the perspective of Indonesian law, is regulated in Law Number 23 of 2004 concerning the Elimination of Domestic Violence. In this law, violence is categorized into physical, psychological, sexual violence and domestic neglect. Domestic neglect is considered to be equivalent to financial violence, even though in the regulation, the concept of domestic neglect is formulated without adequate explanation. It may potentially bring up multiple interpretations in law enforcement. There are various action that fall into the category of financial violence, but this paper focuses on financial exploitation by spouse in a marriage. This paper uses normative juridical research method, using secondary data such as relevant laws and regulations, as well as various literature in the field of law. This paper will review how the current laws and regulations in Indonesia do not clearly regulate the act of financial exploitation by a spouse in a marriage, and its legal consequences. From a criminal law perspective, the act of exploiting one's property is categorized as *mala in se*.

1 INTRODUCTION

The family was formed through the marriage process. Marriage is a bond between a man and a woman. Physical and mental union as result of marriage, have consequences including financial consequences. Properties obtained in marriage, is a common property that can be utilized based on mutual consent. Here is the essence of marriage, which is the existence of unity and togetherness.


What the Law expect to be done, does not always go well. Based on data obtained from the Director General of Religious Justice of the Supreme Court, on the causes of divorce, quarrels are the highest cause (46.6 percent), economic factors (28.2 percent) and abandoning spouses (18.2 percent). From the data, it appears that financial factors are one of the factors causing divorce (Andini, 2021)


The social system and the legal system in Indonesia place men as parties who have obligation to work and make money. This is mentioned in the provisions: Article 31 paragraph (3) of Law Number 1 Year 1974 concerning Marriage: Husband is the

Head of Family and wife as the housewife. In addition, the Marriage Law states in Article 34 paragraph (1) that the Husband is obliged to protect his wife and provide all things the necessities of married life in accordance with his ability. (2) The wife shall take care of the household affairs as best as possible.

The formulation of this regulation gives rise to a narrow view, namely the view that economic problems in the household is identical to the condition of insufficient economic needs, which is entirely the responsibility of husband. Whereas in reality, economic problems in the household have a broader meaning. For example, women who use their husband's income irresponsibly or otherwise. In this case, we can see that it is not always the husband as the lawbreakers.

Examples of financial problems can also be in the form of dishonesty of the spouse (either husband or wife) about financial problems, for example by hiding assets, hiding transactions, and financial exploitation by the spouse (either husband or wife).

^a  <https://orcid.org/0000-0002-6966-2358>

^b  <https://orcid.org/0000-0001-7070-5557>

In fact, there may be situations where one party uses property that is the work of the spouse, or even the spouse's property arbitrarily without consent. This condition shows that there has been exploitation of the financial aspects of the household. This paper will use the terminology "financial exploitation".

The term "financial exploitation" is not found in the laws and regulations in Indonesia. The authors use the term to describe the concept of the occurrence of arbitrary or excessive utilization of property / money belonging to couples in marriage.

Financial exploitation bring harm to victims. The losses that arise are both material and immaterial losses. The act of financial exploitation by the spouse will also have an impact on the psychological condition of the victim. Financial exploitation has not been clearly regulated in the Indonesian legal system. It causes difficulties to protect the victims.

The vagueness of this regulation is caused by the definition and qualification of actions in Law Number. 23 of 2004 on Elimination of Domestic Violence (hereinafter referred to as the Domestic Violence Law). The Domestic Violence Law provides a definition:

"Domestic violence is any act against a person, especially a woman, resulting in physical, sexual, psychological, and/or domestic neglect, including threats to commit acts, coercion, or unlawful deprivation of liberty within the domestic sphere."

The Domestic Violence Law concern on women protection, although in fact, women can also violate the law.

The Domestic Violence Law classifies violence into physical, mental, sexual violence and domestic neglect. The phrase "domestic neglect" refers more to the actions of a person (especially the husband) who relinquishes responsibility to the household, so that the scope is narrower than financial abuse in a broad sense.

Financial abuse is part of Domestic Violence, which contains elements of manipulation and exploitation, and results in violence causing misery. (Syarqiyah, 2019). The definition of financial abuse was developed by various studies, but until now the substance of the Domestic Violence Law has not changed, so there is still confusion in law enforcement.

This study will examine the concept of financial exploitation and the qualifications of such actions from a criminal law perspective, given that there is a very vague boundary between the private aspect of financial relations between husband and wife, and the existence of a public aspect in which acts of violence

in any form, are criminal acts. (Kurniawan & Setiawan, 2016)

2 METHODS (AND MATERIALS)

2.1 Problem Identification

1. Can the act of financial exploitation by a spouse in a marriage be categorized as a criminal act?
2. How does the Indonesian legal system regulate law enforcement in cases of financial exploitation by couples in a marriage in order to accommodate the protection of victims?

2.2 Method

This research is done by using normative juridical methods. This is a descriptive analytical research. This research uses statute approach and conceptual approach.

The data used are secondary data in the form of legal materials as follows:

1. Primary Legal Materials, law and regulations such as:
 - a. Indonesian Civil Code
 - b. Indonesian Criminal Code
 - c. Law Number 1, Year 1974 concerning Marriage
 - d. Law Number 23, Year 2004 concerning Elimination of Domestic Violence
2. Secondary legal materials, such as literature, books and journals.

This study is intended to analyze the qualifications of financial exploitation by spouses from the perspective of the criminal justice system in Indonesia, as well as to examine how law enforcement in order to protect the rights of victims.

3 DISSCUSIONS

3.1 Definition of "Financial Exploitation by Spouse"

Marriage has consequences for property. The concept of Indonesian law recognizes the principle of unity of property, in which the property obtained during marriage becomes a joint property. Based on Article 36 paragraph 1 of Law Number 1 Year 1974 concerning Marriage, (hereinafter referred to as the

Marriage Law), the use of joint property is required based on mutual consent.

The arbitrary use of marital property, dishonesty regarding financial aspects and irregularities in financial behavior in the household, have not received clear arrangements in the Indonesian legal system.

Rules relating to property in marriage are listed in the Marriage Law. The Marriage Law is a purely civil regulation. This means that this rule does not reach things that contain elements against the law from the point of view of criminal law, including about the potential for abusive behavior towards property.

The term financial abuse becomes a concept that must be defined clearly. Various studies explain the concept of financial abuse as follows:

- a. Khadijeh Abolmaali, Hayedeh Saberi, & Sausan Saber : Financial or economic violence includes behavior such as maintaining control over finance, creating a barrier to spending money, withholding access to money, making the victim financially dependent, not allowing the victim to work, income control and taking credit card or spouse's money, interpellation for spending money and financial abuse by the offender. (Abolmaali&Saber, 2014).
- b. A study conducted by a team of researchers from several universities in the UK presented a concept "*financial infidelity in romantic relationship*". Definition of financial infidelity is: *engaging in any financial behavior expected to be disapproved of by one's romantic partner and intentionally failing to disclose this behavior to them.* (Garbinsky, 2019)
- c. The research argue that financial infidelity arises from conflict between one's own financial preferences, goals, and desires, and those dictated by a significant other. The disagreement represents a form of normative conflict (Ottar Olsen and Grunert 2010; Packer 2008). When normative conflicts arise, partners must make a choice: forgo their own preference, follow their own preference at the risk of partner disapproval, or follow their own preference and hide the behavior (Thomas, Jewell, and Wiggins Johnson 2015). It is this latter behavior—hidden financial behavior that one anticipates will elicit disapproval from their partner—that describes how we conceptualize financial infidelity. Because relationship partners are a single unit, whatever one does affects the other's financial well-being and the couple's financial health as a whole. (Garbinsky, 2019)

Based on the definition arising from the study, the author gained an understanding that financial violence is a variety of actions against property (money / assets) committed by a person (in this case—a spouse), in which case the action has an impact on the appearance of losses either personally on the spouse, or loss to the overall household finances. Using an inductive approach, the authors identified 12 categories of financial infidelity behaviors:

1. hiding or lying about savings (e.g., amount of savings, presence of account);
2. hiding or lying about spending;
3. spending saved money;
4. lying about paying bills/expenses;
5. creating undisclosed debt;
6. hiding personal financial matters;
7. undisclosed gambling;
8. hiding or lying about investments;
9. directly harming spouse financially (one's gain is the other's loss);
10. giving money to others;
11. inappropriate tax behavior; and
12. hiding or lying about income (e.g., source or amount, additional income received). (Garbinsky, 2019)

From the 12 forms of behavior, the study will focus on the 9th form (directly harming spouse financially (one's gain is the other's loss)); where the behavior is a form of exploitation. According to the Oxford Dictionary, exploitation means the fact of using a situation in order to get an advantage for yourself. (Oxford, 2021)

3.2 The Concept of Property Unity in Indonesian Marriage Law

Family is formed through the events of marriage. Based on Article 1 of Marriage Law, marriage is defined as physical and mental bond between a man and a woman as husband and wife with the aim of forming a happy and eternal family based on the Almighty God.

The definition shows that from the perspective of Indonesian law, marriage is not only related to the physical aspect, but relates to the mental and spiritual aspects. As a birth bond, marriage is a legal relationship between a man and a woman to live together as husband and wife. This bond is a formal relationship that is real, both for those who bind themselves and for others, and society. (Saleh, 1976)

As an inner bond, marriage is a mental connection that is intertwined because there is an equal and

sincere willingness between a man and a woman to live together as husband and wife. (Saleh, 1976)

Marriage has consequences for physic and mental unity, as well as on the property owned in marriage, the Indonesian legal system recognizes the concept of shared property ownership. Article 35 paragraph (1) of the Marriage Law states that property obtained during marriage becomes a joint property.

Based on this article, shared property is the property of the husband and wife obtained during marriage. The one who gets can be a husband and wife together, or a husband who works and a wife who does not work or a working wife and a husband does not work. It is not determined who obtains the property but it is obtained during marriage. (Djuniarti, 2017).

Article 36 paragraph (1) of the Marriage Law stipulates that regarding joint property, the husband or wife may act with the consent of both parties. The concept of shared property means that each party has the right to take advantage of the property owned, but must be with the consent of the spouse.

In building a marriage, it takes trust or mutual trust between the two parties, including related to the utilization of property in marriage. But in reality, it can't always be realized. Financial exploitation can occur while the wife or husband in a marriage, especially those who do not work demand the fulfillment of needs or desires unreasonably and unilaterally by using the property produced by the spouse. This triggers a conflict in the private space.

In its development, from the point of view of civil law, the state provides a means for couples who do not want to adopt joint property through marriage agreements in which the separation of property may executed. Prevention of the risk of financial exploitation can be overcome by marriage agreements.

The purposes of the Marriage Agreement are:

- a) Separating the property between the husband and the wife so that their wealth does not mix. Therefore, if at any time they divorce, the property of each party is protected.
- b) On the debts of each party they make in their marriages, each will be solely responsible.
- c) If either party wants to sell their property there is no need to ask permission from their spouse (husband/wife).
- d) As well as the loan facilities they apply for, they no longer have to seek prior permission from their spouse (spouse) in terms of securing assets registered in the name of one of them. (Widanarti, 2020)

Asset separation agreements in marriage can actually be a solution to prevent or avoid potential financial exploitation by spouses. With that agreement, the parties clearly know that they are only entitled to take legal action against their property. The asset separation agreement must be agreed upon by both parties. The formulation of this agreement is based on the principle of freedom of contract.

Bernadette M. Waluyo, stated the principle of freedom of contract means the existence of four kinds of freedom, namely:

- a) Freedom for the parties to make or not make agreements.
- b) Freedom to determine with whom the parties will enter into an agreement.
- c) Freedom for the parties to determine the agreement in a certain form or not.
- d) Freedom for the parties to determine the content, validity and terms of the agreement (Agustine, 2017)

The law does not give compulsion for the making of this marriage covenant. The parties (husband and wife) are given the complete freedom to choose whether or not to make a marriage agreement according to the conditions of their needs in real time.

The law provides a means to prevent potential financial exploitation by spouse in marriage through private law regulations. In this case the initiative comes from the parties and the state only facilitates the needs of the parties through procedures that must be taken based on the prevailing laws and regulations.

In the event that a property separation agreement is not made and an act of financial exploitation by the spouse occurs, based on the civil legal system in Indonesia, there is no possibility of a civil lawsuit from the aggrieved party related to the amount of assets exploited. In practice, such conditions lead to divorce lawsuits on the basis of continuous quarrels/disputes.

In the next sub-chapter will be described an analysis of financial exploitation from the point of view of the Indonesian criminal law system.

3.3 Criminal Law Perspective on Financial Exploitation

Financial exploitation by spouses in marriage, is not currently strictly regulated. Based on the description in the previous sub-chapter, from the perspective of civil law, financial exploitation by spouses have no legal consequences. The authors argue that acts of financial exploitation as part of financial violence so, it will need to be regulated also by criminal law.

Criminal law is a whole of principles and regulations followed by the state or another common law society, where they as preserved from the public order have prohibited the conduct of unlawful acts and have associated violations of its rules with a special suffering in the form of punishment. (Lamintang, 1966). As part of a legal system, Andi Hamzah argues that criminal law in a country is the moral code of a nation. There we can see what is actually forbidden, not allowed, and what to do in a society or country. (Hamzah, 2017).

Criminal law is a public law. It is not an individual who acts in case of violation of the law, but the state through the law enforcer. There are some exceptions, for example in the certain crimes, that require denunciation from the aggrieved party. (Hamzah, 2017).

Article 51-53 of the Domestic Violence Law formulates physical violence, mental violence and sexual violence as certain crimes that require denunciation from the aggrieved party, but regulation regarding classification of crimes for domestic neglect has not been explicitly regulated.

In the concept of criminal law, deeds are classified into *mala in se* and *mala prohibita*. The Latin term *mala in se* translates to mean "wrong in itself," or "evil in itself." In the legal system, *mala in se* refers to acts that are inherently wrong, or an act that is wrong in and of itself. This is in contrast to *mala prohibita*, which is an act that is wrong because it is prohibited by law. (Weda, 1996)

Cases of financial exploitation in marriage, closely related between the private aspect and the public aspect. The state needs to affirm the existence of acts of financial violence, including financial exploitation by couples in marriage. This is certainly to provide protection against property obtained during marriage.

The discussion in this section focuses on how acts of financial exploitation are qualified based on the point of view of criminal law, both theoretically and normatively based on the applicable law in Indonesia.

Criminal law, which is basically public law, has a role in providing protection for crimes in private spaces. For example: domestic violence. The state has a role in providing legal protection for its citizens. Domestic violence law is a form of state responsibility in ensuring the fulfillment of security for all citizens.

The consideration of the Domestic Violence Law states unequivocally that all forms of violence, including the domestic violence are crimes against the dignity of humanity. Based on this consideration, it is necessary to affirm that all forms of domestic

violence are crimes so that the perpetrators deserve criminal sanctions.

Article 5 Domestic Violence Law: Anyone shall be prohibited to carry out violence in household against an individual within the scope of the household, be means of:

- a. physical violence;
- b. psychic / mental violence;
- c. sexual violence; or
- d. negligence of household

Article 9

- (1) Anyone shall prohibited to neglect an individual within the scope of the household, whilst in fact according to the law prevailing on him/her or on account of acceptance or agreement he/she shall be obliged to provide livelihood, treatment, or care for the individual.
- (2) The negligence referred to in paragraph (1) shall also apply to anyone bringing about economic dependence by limiting and/or prohibiting an individual to work properly inside or outside the house thereby the victim is placed under the control of the individual.

The above article can be applied in the context of the occurrence of abandonment by a person against his family, among others:

- a. Abandonment of wives by husbands
- b. Abandonment of children by parents
- c. Abandonment of family members (Prastyananda, 2016)

For the context of financial exploitation, it needs to be discussed further, whether financial exploitation included in the violation of Article 9. To state whether an event can be qualified as a criminal act, it is necessary to affirm whether the event meets the element as mentioned in the articles.

Article 9 paragraph (1) has the following elements:

1. Abandon; means do not perform maintenance
2. People in the household sphere, meaning family members who are in the house including the household assistant
3. According to the law or by consent: The main context in the provisions of the article must be understood there is the phrase "according to the law or by agreement or agreement he is obliged..." where in this phrase it is interpreted that there must be an alliance in the form of marriage that makes the emergence of an obligation not to neglect the household or not to commit economic violence. (Irawan, 2019)

Article 9 paragraph (2) contains elements of economic dependence so that the victim is under the control of the perpetrator. This article needs to be adequately explained by law. Grammatically, this chapter refers to the actions of a person who in such a way makes the victim financially dependent on him.

Grammatical interpretation of financial exploitation does not meet these elements. If the perpetrator allows the victim to work and then exploits the results of his work, then in this case the perpetrator is financially dependent on the victim. This is clearly a different meaning, and even contrary to the grammatical meaning of the word "abandonment".

As has been explained in the previous section, financial exploitation is declared as violations of the Domestic Violence Law, according to various studies, but not yet affirmed by legislators.

According to research conducted by the "Convention Watch" – Working Group at Center for Women and Gender Studies University of Indonesia, Article 9 of the Domestic Violence Law includes abandonment carried out in the household sphere in the form of any act that restricts people (women) to work inside or outside the home that makes money and or goods; or let the victim work for exploitation; or abandon family members (Kelompok Kerja, 2000).

If we return to the issue of whether financial exploitation by spouses in marriage can be categorized as criminal acts, then we need to return to the principle of legality stating that an action can only be criminalized if it is stipulated in written rules.

So, as long as Article 9 of the Domestic Violence Law does not provide an authentic interpretation of whether financial exploitation is included in the article, then financial exploitation cannot be penalized. Although if we look, there is an element of loss to the victim both materially and mentally, and the action is clearly contrary to moral rules.

Based on theoretical conception, the act of exploiting a partner's properties, is basically a crime, and may classified as *mala in se*. The act of afflicting a person is certainly an evil act.

The act of exploiting a spouse's property has elements in common with extortion, namely the coercion of the victim so that the victim gives something to him. It's just that this action happens in a private space and the victim does not receive threats of physical violence, but it is possible that the victim experiences psychological distress if she/he does not meet the request from the perpetrator.

The requirement that must be set by the law to criminalize such acts of exploitation is the result of misery on the victim. To criminalize such actions,

legislators need to regulate them more firmly with the use of consistent terms, so it will not potentially cause multi-interpretation.

This paper states that the term "financial violence" in the Domestic Violence Law will be more suitable for use. Domestic neglect and financial exploitation should be part of the financial violence. With the use of the terminology "violence", it will become clear that the act deserves to be punished. Similarly, subjects that can be considered as perpetrators are not only men / husbands, because exploitative actions against the spouse's property can also be done by women or wives.

3.4 Law Enforcement for Financial Exploitation Cases

Financial exploitation by spouses has not been clearly stated in criminal law. A victim of financial exploitation will not get access to justice as long as the rules are not clearly state, whether this act of exploitation is a criminal act or not.

Criminal law enforcement is certainly based on the existence of written law. Until now, law enforcement can be implemented against cases that meet the element of "neglect" as stipulated in Article 9 of the Domestic Violence Law. Criminal law does not justify an extensive interpretation, so financial violence cannot be widely interpreted.

To discuss about law enforcement, this paper tries to analyze some of the judge's verdicts related to the application of Article 49 of the Domestic Violence Law. The verdicts analyzed include: Case No. 797/Pid.B/2013/Pn.Rap. The defendant was sentenced to 8 months in prison for allegedly abandoning his children by not providing a living.

The judge bases his verdict on the regulation of Article 9 paragraph (1) and Article 49 of the Domestic Violence Law, in which the defendant's actions fulfill the element of "neglect". Similarly, in the case No. 205/Pid.Sus/2013/PN. KPJ, the judge sentenced the defendant to 2 months in prison, because the defendant has been proven legally and convincingly committed acts of abandonment by not providing for his wife and children.

Punishment in Article 49 of the Domestic Violence Law is a maximum 3-year prison sentence, but in reality, the verdict handed down is much lower than the maximum sanctions threats. As far as searches are conducted, the judges' rulings only cover cases of domestic abandonment, while cases of financial exploitation by spouses not yet be confirmed through criminal law mechanisms.

4 CONCLUSIONS

Based on the principle of legality, the act of financial exploitation by a spouse in a marriage, has not been explicitly regulated. As criminal law prohibits extensive interpretation, until now the act cannot be classified as a criminal act, even if the nature of the act is eligible to be designated as a criminal act.

Law enforcement is based on the principle of legality, where violations that can be punished by criminal law is an offense that meets the element of abandonment / neglect. Parties who are harmed by acts of financial exploitation by the spouse, usually file a divorce lawsuit. This means that, under Indonesian law, cases of financial exploitation by spouses have not been able to be criminalized.

Recommendation

For the government / legislators: revise article 9 of the Domestic Violence Law by changing the term "domestic neglect" into "financial violence" and adding authentic interpretations / official explanations with regard to the scope of financial violence in which exploitation and abandonment become part of the financial violence.

For law enforcement: to apply the rules based on the principle of legality in order to ensure legal certainty. For the community: to be more aware of financial exploitation potentially done by spouses and to study various prevention efforts.

REFERENCES

- Abolmaali, K., Saberi, H., & Saber, S. (2014). *The Construction and Standardization of a Domestic Violence Questionnaire*. *Sociology Mind*, 4(1), p 51-57. doi.org/10.4236/sm.2014.41007.
- Agustine, O.V. (2017). *Legal Policy on Marriage Agreement after Constitutional Court Decision No. 69/PUU-XIII/2015 to Creating Harmony in Marriage*, *Jurnal Rechtsvinding*, Volume 6, No.1, April 2017, p.63.
- Andini, A. (2021). *Pertengkaran dan Masalah Ekonomi, Penyebab Utama Perceraian*, from: <https://lokadata.id/artikel/tingkat-perceraian-lebih-tinggi-dari-perkawinan>, accessed on 28th March 2021, 06.00 pm.
- Djuniarti, E. (2017). *Hukum Harta Bersama Ditinjau Dari Perspektif Undang-undang Perkawinan dan KUH Perdata.*, *Jurnal Penelitian Hukum De Jure*, Vol. 17, No.4, December 2017, p. 456.
- Garbinsky, E. N., et.al. (2019). *Love, Lies, and Money: Financial Infidelity in Romantic Relationships*, Oxford University Press, p. 2, 5.
- Hamzah, A. (2017). *Hukum Pidana Indonesia*, Jakarta, Sinar Grafika, p. 9.
- Irawan, A. (2019). *Batasan Penelataran Rumah Tangga Dalam Perspektif Hukum Kekerasan Dalam Rumah Tangga Dan Hukum Perkawinan Indonesia*, *Jurnal Hukum Responsif*, FH UNPAB, Vol 7 No. 2, p. 104.
- Kelompok Kerja "Convention Wacath" Pusat Kajian Wanita dan Jender. (2000), *P.mahaman Bentuk-bentuk Tindak Kekerasan Terhadap Perempuan dan Alternatif Pemecahannya*, Jakarta: Universitas Indonesia, p.11.
- Kurniawan, J. E., & Setiawan, J. L. (2016). *Pengembangan Model Dukungan Sosial Orangtua Berbasis Relasi Pernikahan untuk Meningkatkan Entrepreneurial Self Efficacy* (Laporan Kemajuan Penelitian Unggulan Perguruan Tinggi, tidak diterbitkan). Universitas Ciputra, Surabaya.
- Lamintang, P.A.F. (1996). *Dasar-dasar Hukum Pidana Indonesia*. Bandung: Citra Aditya Bakti, 1996, p..2.
- Olsen, S. O., & Grunert K. G. (2010). "The Role of Satisfaction, Norms and Conflict in Families' Eating Behaviour," *European Journal of Marketing*, 44 (7/8), 1165-81.
- Packer, D.J. (2008). "On Being Both with Us and against Us: A Normative Conflict Model of Dissent in Social Groups," *Personality and Social Psychology Review*, 12 (1), 50-72.
- Prastyandana, N. (2016). *Penelantaran Rumah Tangga (Kajian Hukum Dan Gender)*, *Muwazah*, Vol. 8, No.1, ISSN 2502-5368 (Paper) ISSN 2085-8353 (Online), p. 79.
- Saleh, K.W. (1976), *Hukum Perkawinan Indonesia*, Jakarta: Ghalia Indonesia, p.14-15.
- Syarqiyah, K. (2019). "Kekerasan Finansial? Kenali Cirinya" Statement delivered on Investime.CNBC Indonesia, <https://www.cnbcindonesia.com/investment/20191011194605-23-106404/kekerasan-finansial-kenali-cirinya>.
- Thomas, V. L., Jewell R. D., & Johnson, J. W. (2015). "Hidden Consumption Behaviour: An Alternative Response to Social Group Influence," *European Journal of Marketing*, 49 (3/4), 512-31
- Widanarti, H. (2020). Implementasi Putusan Mahkamah Konstitusi Nomor 69/PUU-XIII/2015 terhadap Hukum Perkawinan di Indonesia. *Law, Development and Justice Review*, 3(1), p.121-141. <https://doi.org/10.14710/ldjr.v3i1.7999>.
- Weda, M. D. (1996). *Kriminologi*, Jakarta, PT.Raja Grafindo Persada, p.11.