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Legal Analysis of the Validity of Child Witnesses in Premeditated Murder Cases (Study of Decision No. 50/Pid.B/2023/PN Son)

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Abstract: **The research aims** to analyze (1) the legal validity of child witness testimony under Indonesian criminal procedure law, and (2) judicial considerations in Decision Number 50/Pid.B/2023/PN Son. **This research employs** an empirical (socio-legal) approach with a case study method. Primary data were obtained through interviews with legal practitioners, while secondary data consisted of court decisions, statutory regulations, and relevant legal literature. Data were collected through interviews and document analysis and analyzed qualitatively to assess the consistency between legal norms and judicial application. **The novelty** of this study lies in its integrated analysis of the conflict between Article 168 of the Indonesian Criminal Procedure Code (KUHAP), which limits testimony from family members, and its flexible application in judicial practice, particularly in cases involving child witnesses in premeditated murder. This study also contributes by combining evidentiary theory and psychological credibility analysis in assessing child testimony. **The findings** reveal that child witness testimony, although formally limited due to age and familial relationship, can still be considered valid when supported by corroborative evidence such as forensic reports and expert testimony. The court implicitly applied a substantive approach prioritizing material truth over rigid procedural formalism. However, judicial reasoning lacks systematic legal justification, particularly in explaining exceptions to evidentiary rules and the weight of each piece of evidence. **In conclusion**, the admissibility of child witnesses in criminal proceedings is not solely determined by formal legal requirements but also by their probative value and consistency with other evidence. Strengthening judicial reasoning is necessary to ensure both substantive justice and normative legitimacy in criminal adjudication.
Keywords: Child Witness; Evidentiary Law; Premeditated Murder; Criminal Procedure; Judicial Reasoning

***Abstrak: Penelitian ini bertujuan** untuk menganalisis (1) validitas hukum kesaksian anak di bawah hukum acara pidana Indonesia, dan (2) pertimbangan yudisial dalam Putusan Nomor 50/Pid.B/2023/PN Son. Penelitian ini menggunakan **pendekatan empiris** (sosio-hukum) dengan metode studi kasus. Data primer diperoleh melalui wawancara dengan praktisi hukum, sementara data sekunder terdiri dari putusan pengadilan, peraturan perundang-undangan, dan literatur hukum yang relevan. Data dikumpulkan melalui wawancara dan analisis dokumen serta dianalisis secara kualitatif untuk menilai konsistensi*

Volume 4, Issue 1, 2026, pp. 84-96
https://doi.org/10.33506/jlj.v4i1.3980

antara norma hukum dan penerapan yudisial. ***Kebaruan*** *penelitian ini terletak pada analisis terintegrasi mengenai konflik antara Pasal 168 Kitab Undang-Undang Hukum Acara Pidana Indonesia (KUHAP), yang membatasi kesaksian dari anggota keluarga, dan penerapannya yang fleksibel dalam praktik peradilan, terutama dalam kasus yang melibatkan saksi anak dalam pembunuhan berencana. Studi ini juga berkontribusi dengan menggabungkan teori pembuktian dan analisis kredibilitas psikologis dalam menilai kesaksian anak.* ***Hasil penelitian*** *menunjukkan bahwa kesaksian saksi anak, meskipun secara formal terbatas karena usia dan hubungan keluarga, masih dapat dianggap sah ketika didukung oleh bukti tambahan seperti laporan forensik dan kesaksian ahli. Pengadilan secara implisit menerapkan pendekatan substantif yang mengutamakan kebenaran material daripada formalisme prosedural yang kaku. Namun, penalaran yudisial kurang memiliki justifikasi hukum yang sistematis, terutama dalam menjelaskan pengecualian terhadap aturan pembuktian dan bobot masing-masing bukti.* ***Kesimpulannya****, penerimaan saksi anak dalam proses pidana tidak hanya ditentukan oleh persyaratan hukum formal tetapi juga oleh nilai pembuktian mereka dan konsistensinya dengan bukti lainnya. Memperkuat penalaran yudisial diperlukan untuk memastikan keadilan substantif dan legitimasi normatif dalam adjudikasi pidana.*

Kata Kunci: *Saksi Anak; Hukum Pembuktian; Pembunuhan Berencana; Prosedur Pidana; Penalaran Yudisial*

1. INTRODUCTION

Indonesia is a country governed by the rule of law. As such, all actions taken by government officials and citizens must comply with applicable laws.[1] This has been clearly stated in the preamble to the 1945 Constitution of the Republic of Indonesia (UUD 1945) that "The Republic of Indonesia is based on the rule of law (rechtsstaat), not on mere power (machstaat)."[2]

Evidence is a central element in the criminal justice process because it determines the validity of a court ruling. In the context of Indonesian criminal procedure law, provisions regarding evidence are set forth exhaustively in Article 184(1) of the Criminal Procedure Code (KUHAP). Among these forms of evidence, witness testimony often plays a dominant role in proving the elements of a criminal offense, particularly in cases

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[1] M Tasbir Rais, "NEGARA HUKUM INDONESIA: GAGASAN DAN PENERAPANNYA," *Jurnal Hukum Unsulbar* 5, no. 2 (2022): 11–31, https://doi.org/10.31605/j-law.v5i2.1854.

[2] Udiyo Basuki and Kamal Fahmi Kurnia, "79 Tahun Negara Hukum: Refleksi Atas Upaya Mewujudkan Negara Hukum Pancasila Yang Melindungi Hak Asasi Manusia," *Viva Themis : Jurnal Ilmu Hukum Dan Humaniora* 8, no. 1 (2025), https://doi.org/10.24967/vt.v8i1.3858.

Volume 4, Issue 1, 2026, pp. 84-96
https://doi.org/10.33506/jlj.v4i1.3980

involving crimes against life, such as premeditated murder.[3] However, issues arise when a witness's testimony comes from a party who is related to the defendant. Article 168 of the Criminal Procedure Code explicitly restricts the categories of witnesses whose testimony may not be heard, including blood relatives or in-laws within certain lines of kinship. In judicial practice, this provision often creates a dilemma between the need for substantive evidence and the protection of a witness's objectivity.[4]

The most common crimes in society today are those that threaten physical safety and life. Murder is a heinous and barbaric act that violates the most fundamental human values.[5] In addition to being influenced by the perpetrator's motives or background, murder also reflects the moral decline of this nation. In addition to moral decline, economic hardship, hatred, and a loss of patience are some of the factors leading to murder. The ease with which someone takes another person's life warrants further investigation into its causes. The harshness of life and the fragility of religious education may also be factors contributing to how easily someone takes another person's life.

Crimes against life committed by individuals or groups constitute a violation of human rights, as enshrined in Article 28A of the 1945 Constitution of the Republic of Indonesia (UUD NRI 1945), which states that "every person has the right to preserve their life and livelihood." As a nation governed by the rule of law, all people are equal before the law. Everyone is considered equal in status and rank (equality before the law). Taking a person's life is in violation of Law of the Republic of Indonesia No. 39 of 1999 on Human Rights.

In the Criminal Code, crimes against life can be distinguished or categorized on two grounds: First, based on the elements of the offense; and Second, based on the object (life). Murder is further divided into several categories, including ordinary murder as defined in Article 338 of the Criminal Code, and premeditated murder as defined in Article 340 of the Criminal Code. When this criminal act of murder is committed intentionally or premeditated, the legal consequence-namely, the criminal penalty-will be more severe compared to a murder committed without aggravating factors, such as prior planning.

The text of Article 338 of the Criminal Code is as follows: "Anyone who intentionally takes the life of another person shall be punished for murder with imprisonment for a maximum of fifteen years," Premeditated murder is regulated under Article 340 of the

[3] Jojor Cristina and Indri Manalu, "Analisis Peran Alat Bukti Dan Keterangan Saksi Dalam Menentukan Keputusan Pengadilan Pidana," *Jurnal Kajian Hukum Dan Kebijakan Publik* 3, no. 1 (2025): 245–63, https://jurnal.kopusindo.com/index.php/jkhkp/article/view/1204.

[4] Fakhris Lutfianto Hapsoro Ismail, "PENGUSUNGAN CALON ANGGOTA DEWAN PERWAKILAN DAERAH SEBAGAI BENTUK REPRESENTASI DAERAH Kajian Putusan Nomor 65P/HUM/2018," *Jurnal Yudisial* 13, no. 1 (2020): 37–53, https://doi.org/10.29123/jy.v13i1.382.

[5] Sri Hidayani Martinus Halawa, Zaini Munawair, "Penerapan Hukum Terhadap Tindak Pidana Pembunuhan Dengan Sengaja Merampas Nyawa Orang Lain (Studi Kasus Nomor Putusan 616/Pid.B/2015/PN. Lbp)," *JUNCTO : Jurnal Ilmiah Hukum* 2, no. 1 (2020): 9–15, https://doi.org/10.31289/juncto.v2i1.228.

Volume 4, Issue 1, 2026, pp. 84-96
https://doi.org/10.33506/jlj.v4i1.3980

Criminal Code, which states: “Whoever intentionally and with prior planning takes the life of another person shall be punished for premeditated murder with the death penalty or life imprisonment or imprisonment for a specific term, not exceeding twenty years.” Crime rates in Indonesia are rising, particularly regarding homicide offenses; some homicides have even been committed by students or housewives. Among the many crimes occurring in Indonesia, these murders are not only committed against people who are disliked or not close relatives; rather, these murders also occur within the family. The killing of children often occurs in Indonesia, whether they are still in the womb or have already been born.

The offense of premeditated murder is a distinct offense, just as the offense of ordinary murder is regulated in Article 338 of the Criminal Code. The wording of the offense of premeditated murder is a repetition of the offense of murder in Article 338 of the Criminal Code, with the addition of one more element, namely “with prior planning.” This differs from aggravated murder as regulated in Article 339 of the Criminal Code, which uses the definition of murder directly from the offense of murder. Generally, the offenses contained in the Criminal Code are directed at the legal subject “person”; for example, the subject of the offense in Article 340 of the Criminal Code is “anyone.” It is clear that “anyone” refers to a person, and this person is singular. In reality, crimes are not always committed by a single person. Sometimes, a crime is also committed by two or more people to carry out a criminal act. In criminal law doctrine, where a criminal act is committed by one or more people, each of whom performs specific acts, and from those acts a criminal offense arises, this is referred to as participation or deelneming.

Several previous studies have shown that the presentation of evidence in Indonesian criminal procedure law still tends to focus on formal aspects rather than the substance of the evidence.[6] Furthermore, studies on the status of child witnesses in criminal cases confirm that a witness’s young age does not automatically invalidate the evidentiary value of their testimony, provided it is supported by other relevant evidence.[7]

From an international perspective, evidentiary theory distinguishes between admissibility and probative value, whereby a piece of evidence may have formal limitations but still possess high probative value if it is consistent and supported by other evidence.[8] This becomes increasingly relevant in the context of child witnesses, as forensic

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[6] Alwan Hadiyanto, “Urgensi Pembaharuan Kitab Hukum Acara Pidana Dalam Menjawab Tantangan Penegakan Hukum Modern Di Indonesia,” *USM Law Review* 8, no. 3 (2025): 2842–60, https://doi.org/10.26623/julr.v8i3.12820.

[7] Lidia Wulandary Patasik and Dedy Wardana Nasoetion, “Kekuatan Pembuktian Keterangan Saksi Dengan Status ODGJ Non Akut Dalam Perkara Pidana,” *Journal of Artificial Intelligence and Digital Business (RIGGS)* 5, no. 1 (2026): 3647–64, https://doi.org/10.31004/riggs.v5i1.6703.

[8] Hery Firmansyah Vanessa Vanessa, “Analysis of the Validity of Electronic Evidence in Criminal Trial Proceedings and the Implementation of Its Admissibility (Judgment Study),” *Indonesian Journal of Law and Economics Review* 20, no. 4 (2025), https://doi.org/10.21070/ijler.v20i4.1395.

Volume 4, Issue 1, 2026, pp. 84-96
https://doi.org/10.33506/jlj.v4i1.3980

psychology research indicates that children are capable of providing reliable testimony, particularly regarding traumatic events.

Based on this, there is a research gap in the form of insufficient studies specifically examining the conflict between Article 168 of the Criminal Procedure Code and judicial practice in premeditated murder cases involving child witnesses. Therefore, this study offers a novel contribution by conducting a legal analysis of the admissibility of child witnesses in premeditated murder cases through an examination of Judgment No. 50/Pid.B/2023/PN Son, as well as by analyzing the judges' reasoning in balancing formal and substantive aspects of the evidence.

2. METHOD

This study employs an empirical (socio-legal) research design to examine the application of criminal procedural law in practice, particularly concerning the admissibility of witnesses. The research applies a case approach by analyzing Judicial Decision Number 50/Pid.B/2023/PN Son.

Data were obtained from two sources. Primary data were collected through semi-structured interviews with relevant legal actors, including judges, prosecutors, and legal practitioners involved in or knowledgeable about the case. Secondary data consisted of court decisions, statutory regulations, and relevant legal literature. Data collection techniques included interviews and document analysis, focusing on judicial reasoning and the application of legal norms regarding witness admissibility.[9]

The data were analyzed using qualitative analysis, by systematically interpreting empirical findings in light of legal principles and statutory provisions. This approach aimsnto assess the consistency between normative rules and their implementation in judicial practice.

3. DISCUSSION

3.1. The Admissibility of Witness Testimony

The admissibility of witnesses in criminal cases cannot be separated from the evidentiary process in court, particularly how judges apply the rules of criminal procedure. In the case of Judgment No. 50/Pid.B/2023/PN Son, the issue no longer concerns the definition of a witness as set forth in the Criminal Procedure Code. Instead, the issue has shifted to a more complex matter regarding how the judge evaluates and uses the testimony of a witness whose testimony is limited due to their status as a child and their family relationship with the defendant.

The defendant's biological child, EHS, also known as MRP, is one of the key witnesses in the case. Family members who are related by blood up to a certain degree fall into the category of parties whose testimony cannot be heard as witnesses, unless there is consent

[9] Rukin, *Metode Penelitian Kualitatif Edisi Revisi*, ed. Abdul Rofiq (Surabaya: Jakad Media Publishing, 2021).

from the relevant parties, according to Article 168 of the Criminal Procedure Code. Essentially, this provision is designed to maintain objectivity and prevent bias that may arise from emotional ties and personal interests. However, in this case, the panel of judges still heard and considered the child witness's testimony. This highlights the normative tension between formal legal rules and substantive evidentiary requirements. On the other hand, criminal procedure law emphasizes the importance of restricting certain witnesses to ensure the fairness of the judicial process. Conversely, the facts of the case often reveal that the witnesses who are normatively restricted are the very people who know the most about the criminal incident that occurred.

Evidence theory can analyze this phenomenon. This theory distinguishes between admissibility (whether evidence is legally admissible or not) and probative value (the evidentiary value of the evidence).[10] In this case, although there are doubts regarding admissibility due to the provisions of Article 168 of the Criminal Procedure Code, the child witness's testimony carries significant probative value because he or she is the only witness with firsthand knowledge of the events in question.

In addition, the child witness's testimony in this case was given without an oath because the child was under 15 years of age at the time of the incident, as permitted under Article 171 of the Criminal Procedure Code. Normatively, testimony given without an oath carries weaker probative value compared to testimony given under oath, based on the assumption that an oath contains moral and religious elements that can reinforce the witness's honesty. However, judges do not always reject or disregard such evidence. On the contrary, the child witness's testimony continues to be used as an important part of the evidentiary framework. This indicates that the judge adopts a more substantive approach in evaluating evidence, where probative value is determined not only by formalities but also by the relevance and consistency of the witness's testimony with other evidence.

Further consideration reveals that the judge's decision to accept the child witness's testimony was reinforced by other evidence, particularly expert testimony and the results of the medical examination. The fact that the autopsy indicated blunt force trauma and asphyxia as the mechanism of death suggests that the victim's death was not the result of suicide. A form of corroborative evidence emerges when the child witness's testimony aligns with this scientific evidence.

In this situation, it can be said that the judge implicitly applies the best evidence approach, which means using the best evidence available given the factual circumstances of the case. Although the term "rule of best evidence" is not explicitly recognized in the

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[10] Khansa Laily et al., "RELEVANSI KEPENTINGAN ALAT-ALAT BUKTI DALAM PROSES PENYELESAIAN HUKUM PERDATA," *The Juris* 8, no. 1 (2024): 95–104, https://doi.org/10.56301/juris.v8i1.1185.

Indonesian legal system, this concept can be applied substantively in judicial practice, particularly when judges are faced with limitations in formal evidence.

The results of the psychological examination of the child witness also indicate that the testimony was consistent across the two stages of examination. This is crucial for assessing the witness's credibility, as consistency is a primary indicator of memory reliability in forensic psychology. Children who have experienced trauma typically retain vivid memories of the event, although there is a possibility that their memories may be distorted in certain aspects.[11]

Furthermore, the judge's approach in this case reflects a shift from a formalistic evidentiary paradigm to a more substantive and interdisciplinary one, which relies on legal norms as well as scientific research findings from other fields, such as psychology and forensic science.

Although this ruling can be considered progressive in substance, there are several points worth noting. First, the judge did not provide a strong legal basis for the exception to Article 168 of the Criminal Procedure Code. Furthermore, he did not explain in detail whether the consent required by law had been obtained. This lack of reasoning could lead to legal uncertainty and inconsistency in the application of the law in other cases.

Second, the judge did not thoroughly examine the child witness's testimony. In the theory of evidence, the assessment of evidentiary value must be clearly articulated to demonstrate how the judge reached their conviction. In terms of evidentiary methodology, the ruling becomes less clear without this explanation.

Third, although an interdisciplinary approach was employed, the judges have not effectively incorporated the results of the psychological evaluation into their legal reasoning. The results of the psychological evaluation should form part of a systematic assessment when evaluating the credibility of a witness.

Furthermore, this case highlights a discrepancy between standards and practice in Indonesian criminal procedure law. The judiciary requires flexibility in admitting evidence, particularly in difficult cases with few witnesses. Conversely, the Criminal Procedure Code (KUHAP) continues to employ a formalistic approach and strictly limits the categories of witnesses.[12]

This gap indicates that Indonesia's criminal procedural law system is undergoing change. Formalistic methods have been abandoned, but have not yet been fully replaced by a newer, more flexible theoretical framework. In such a situation, efforts are needed to

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[11] Wahab Aznul Hidaya and Muharuddin Muharuddin, "Penerapan Diversi Undang-Undang No 11 Tahun 2012 Tentang Sistem Peradilan Pidana Anak (Studi Kasus Polres Sorong Kota)," *JUSTISI* 6, no. 2 (2020): 52–63, https://doi.org/10.33506/js.v6i2.965.

[12] Maulana Fahmi Idris, *Tahapan Peradilan Pidana*, ed. MM Dr. Ir. Agus Wibowo, M.Kom, M.Si (Semarang: Yayasan Prima Agus, 2025).

Volume 4, Issue 1, 2026, pp. 84-96
https://doi.org/10.33506/jlj.v4i1.3980

reconstruct the doctrine of evidence so that it can keep pace with scientific advancements and the demands of judicial practice.

From a broader perspective, the findings of this case also relate to child protection within the criminal justice system. On the one hand, various national and international legal instruments establish that children have the right to be heard as legal subjects. Conversely, as witnesses in criminal cases, children face challenges regarding psychological protection and the risk of trauma.

Therefore, the use of child witnesses in judicial proceedings must be balanced with adequate protective mechanisms, as well as clear standards for evaluating the testimony provided. Ultimately, judicial practice in this case demonstrates that the admissibility of a witness cannot be narrowly understood as merely the fulfillment of formal and substantive requirements. Rather, the validity of a witness must be viewed within a broader context: how the witness's testimony helps uncover the actual truth. In such situations, judges tend to adopt a pragmatic, results-oriented approach to discovering the truth, though they must remain flexible in applying legal norms.

However, this flexibility must be balanced with strong legal reasoning to avoid creating the impression of inconsistency or even deviation from criminal procedural law. Consequently, there is a need to strengthen the legal justification aspect in every ruling, so that judicial practice is not only substantively fair but also normatively valid.

Overall, this analysis confirms that Indonesian criminal procedure law must shift toward a more integrative, adaptive, and evidence-quality-based approach. In this regard, the admissibility of a witness will be determined by their efforts to establish material truth supported by other relevant and credible evidence rather than by normative categories.

3.2. Judicial Considerations in Imposing Criminal Sentences

The main issue in Case No. 50/Pid.B/2023/PN Son relates not only to the proof of the criminal act of premeditated murder, but also to how the panel of judges formulated their legal reasoning in imposing sentences on the defendants. A crucial issue that arises is whether the judges' reasoning met the standards of proof under criminal procedure law and whether the legal framework employed reflected the principles of justice, legal certainty, and public interest.

More specifically, there are several related issues worth analyzing. First, have the elements of the crime of premeditated murder, as stipulated in Article 340 of the Criminal Code, been proven legally and convincingly based on the evidence presented in court? Second, how did the judges assess the involvement of each defendant in the criminal incident, including the existence of joint liability (complicity)? Third, did the judge's considerations in imposing the sentence take into account the principles of proportionality and individualization of punishment? Thus, the analysis of the judge's considerations focuses not only on the final outcome—the verdict—but also on the legal reasoning used

Volume 4, Issue 1, 2026, pp. 84-96
https://doi.org/10.33506/jlj.v4i1.3980

to reach that verdict.

In evaluating the judge's considerations, several legal provisions serve as the normative basis. First, Article 183 of the Criminal Procedure Code (KUHAP) stipulates that a judge may not impose a sentence on a person unless, based on at least two valid pieces of evidence, the judge is convinced that a criminal act actually occurred and that the defendant is the one who committed it. This provision reflects the statutory negative proof system (negatief wettelijk bewijsstelsel), which combines the elements of evidence and the judge's conviction. Second, Article 184 of the Criminal Procedure Code (KUHAP) specifies the types of valid evidence, namely witness testimony, expert testimony, documents, circumstantial evidence, and the defendant's statement. In the context of this case, all of these forms of evidence were used to construct the case. Third, Article 340 of the Criminal Code (KUHP), as the substantive legal basis, stipulates that premeditated murder requires the elements of "intentionally" and "with prior planning." The element of premeditation (voorbedachte raad) is the key distinction between ordinary murder and premeditated murder, which impacts the severity of the criminal penalty.

Furthermore, the principle of nulla poena sine culpa (no punishment without guilt) is a fundamental principle requiring the presence of individual culpability on the part of the defendant before a sentence is imposed. In the context of complicity (deelneming), each perpetrator must be assessed based on their respective roles in the criminal act.[13]

In this case, the panel of judges based its reasoning on the facts revealed during the trial, which were derived from various pieces of evidence. However, upon closer examination, it becomes apparent that the judges' reasoning remains largely descriptive of the facts and does not yet fully demonstrate a systematic legal reasoning structure.

Regarding the element of "whoever," the judges easily concluded that the defendants were legal subjects who could be held criminally liable.[14] This is not an issue because the defendants' identities and legal standing are not in dispute. However, what is more important is proving the element of "intentionally and with prior planning." Based on the trial evidence, it is established that the act of murder was committed jointly by Defendant II AAP along with several other perpetrators, followed by the involvement of Defendant I ARP in the effort to fabricate the victim's death to make it appear as a suicide.

From this account, it can be seen that the element of intent (dolus) is satisfied through the active actions of the perpetrators in committing violence against the victim. Meanwhile, the element of planning can be inferred from the coordination among the perpetrators as well as subsequent actions involving the manipulation of the victim's

[13] Kristi Warista Simanjuntak Wahab Aznul Hidaya, A. Sakti R.S. Rakia, *Pengantar Hukum Indonesia* (Batam: CV. Rey Media Grafika, 2025).
[14] Yuniar Hati Laia, "Pertimbangan Hakim Dalam Pemidanaan Pelaku Tindak Pidana Pembunuhan," *Jurnal Panah Hukum* 1, no. 2 (2022): 178–90, https://doi.org/10.57094/jph.v1i2.785.

Volume 4, Issue 1, 2026, pp. 84-96
https://doi.org/10.33506/jlj.v4i1.3980

condition after death.

However, the question that arises is whether the judge explicitly outlined these indicators of planning. In criminal law theory, planning is not sufficiently proven merely by the existence of repeated or joint actions, but must demonstrate a time lag and an opportunity for the perpetrators to think carefully before committing the act.

In this ruling, the judge appears to have concluded that planning existed based on the sequence of events, but did not provide an in-depth analysis of whether there was a cooling-off period or a process of reflection—which are characteristic of planning. This indicates a weakness in the legal reasoning.

Furthermore, regarding complicity, the judge acknowledged that the criminal act was committed by more than one person. However, the division of roles among the defendants has not been comprehensively analyzed. For example, Defendant II AAP played a direct role in committing physical violence, while Defendant I ARP was involved in the post-incident phase. In this context, the judge should have clearly distinguished between the principal offender (pleger), an accomplice (medepleger), and an accessory (medeplichtige).[15]

The absence of this analysis risks obscuring the degree of culpability of each defendant, which could ultimately affect the proportionality of the sentence imposed. In terms of evidence, the judge relied on a combination of evidence, including witness testimony, expert testimony, and the autopsy report. The consistency between the child's testimony and the autopsy findings demonstrates cross-corroboration, which strengthens the judge's conviction. However, it is again evident that the judge did not explicitly explain how each piece of evidence contributed to proving the elements of the offense. In fact, in modern judicial practice, transparency in the evaluation of evidence is a crucial aspect for ensuring the accountability of the ruling.

4. CONCLUSION

Based on the above analysis, it can be concluded that the judge's reasoning in Case No. 50/Pid.B/2023/PN Son has substantively satisfied the elements of proof for the crime of premeditated murder. The judge successfully established a conviction based on a combination of mutually reinforcing evidence, such that the verdict rendered can be considered substantively valid. However, from an academic and theoretical perspective, the judge's reasoning still has several weaknesses. First, the legal arguments have not been systematically structured, particularly in explaining the elements of planning and complicity. Second, there is no explicit analysis regarding the probative weight of each piece of evidence. Third, there is no apparent effort to integrate criminal law theory more deeply into the reasoning of the judgment. Thus, although this judgment reflects an effort

[15] Wahab Aznul Hidaya, "The Role of Witness and Victim Protection Agency for Imekko Tribe in Criminal Justice System in Sorong," *Law and Justice* 8, no. 2 (2023): 176–91, https://doi.org/10.23917/laj.v8i2.2363.

to achieve substantive justice, strengthening of the legal reasoning is still needed so that the judgment is not only correct in its outcome but also strong in its argumentation. This is important to maintain the consistency and quality of judgments within the Indonesian criminal justice system.

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