

ANALYSIS OF CRIMINAL RESPONSIBILITY OF PERPETRATORS OF PERSECUTION IN CASE NUMBER 162/PID.B/2025/PN STABAT

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Abstract

This study analyzes criminal liability in Case Number 162/Pid.B/2025/PN Stabat, which arose from a confrontation after the taking of two bunches of oil-palm fruit and resulted in a scratch wound to the victim's finger from an egrek knife. The research uses normative legal research with an empirical juridical approach through statutory materials, criminal-law doctrine, the court decision, and interview data. The findings show that the defendant was considered capable of criminal responsibility and no justification or excuse was established. Although assault under Article 351 paragraph (1) of the Criminal Code appeared in the alternative indictment, the panel found the third alternative charge under Article 335 paragraph (1) point 1 proven because the unlawful coercion was committed through violence or threat of violence. The court relied on witness testimony, the defendant's statement, the egrek knife, the oil-palm fruit, the motorcycle, and the visum et repertum, and imposed six months of imprisonment.

Keywords: criminal liability; assault; violence; judicial consideration; court decision

1. Introduction

Criminal liability is the legal mechanism that connects a prohibited act with the person who can be blamed for it. Indonesian criminal law therefore does not stop at proving that a harmful event occurred, because the court must also examine the offender's capacity, fault, unlawfulness, and the absence of grounds that remove punishment. This framework is particularly important in violence cases because the physical consequence must be connected with the defendant's conduct and mental attitude (Rusianto, 2016; Huda, 2018).

Case Number 162/Pid.B/2025/PN Stabat illustrates the need to distinguish the label of a case from the offense ultimately proven at trial. The incident began after two bunches of oil-palm fruit had been taken and developed into a confrontation involving an egrek knife, after which the victim suffered a scratch wound on the right index finger. The factual sequence therefore raised questions about assault, coercive violence, evidentiary sufficiency, and the legal basis selected by the judges.

The public prosecutor formulated alternative charges, including Article 351 paragraph (1) of the Criminal Code on assault and Article 335 paragraph (1) point 1 on unlawful coercion by violence or threat of violence. The use of an alternative indictment required the court to select the formulation that best matched the facts proven at trial rather than simply follow the title of the case. The judgment ultimately applied the third alternative charge, which makes the reasoning behind element-by-element proof central to the analysis.

Evidence in this case was not limited to the victim's account because the judgment also referred to witness testimony, the defendant's statement, the egrek knife, two bunches of oil-palm fruit, a motorcycle, and a visum et repertum. The medical document recorded a scratch wound associated with sharp-force trauma, while the physical evidence helped reconstruct the interaction between the parties. The evidentiary structure shows why material criminal law and criminal procedure must be read together (Harahap, 2014).

Criminal responsibility further required the court to determine whether the defendant could understand and control his conduct. The source decision records no condition that

removed the defendant's capacity to be responsible, and no justification or excuse was accepted as eliminating blameworthiness. This finding allowed the court to move from proof of the act to the imposition of a criminal sanction (Moeljatno, 2018; Saleh, 2017).

The judgment also demonstrates that sentencing is a separate stage from proving guilt. The prosecutor sought eight months of imprisonment, while the panel imposed six months after assessing the proven offense and the circumstances of the case. This difference indicates that the court exercised an independent proportional assessment rather than merely adopting the prosecutorial demand.

The legal problem is therefore not simply whether the victim was injured, but how the proven violence should be legally qualified and attributed to the defendant. A careful analysis must identify the relevant act, the connection between the *egrek* knife and the wound, the defendant's fault, the alternative charge selected by the court, and the evidence supporting each element. Such an approach prevents the analysis from treating "assault" as a conclusion without examining the actual judgment.

This study consequently addresses three questions: the basis of the defendant's criminal liability, the application of the elements of violence or assault in the judgment, and the legal considerations used by the judges in imposing the sentence. These questions are derived directly from the source thesis and are examined through the relationship between criminal-law doctrine and the facts recorded in Case Number 162/Pid.B/2025/PN Stabat. The analysis is intended to show how responsibility is constructed through legally tested facts rather than through the harmful result alone.

2. Methodology

2.1. Research Methodology

The research uses normative legal research with an empirical juridical approach. The normative component examines the Criminal Code, criminal-law doctrine, criminal-procedure principles, and Court Decision Number 162/Pid.B/2025/PN Stabat, while the empirical component uses interview information to understand the implementation of those norms in practice. The two components are analyzed qualitatively so that the legal formulation can be compared with the evidentiary and judicial process reflected in the case file.

Primary materials consist of the court decision and interview data, while secondary materials include criminal-law books, procedural-law literature, and other legal writings contained in the source thesis. The decision is treated as the main document for identifying the indictment, proven facts, evidence, judicial reasoning, and sentence. The analysis does not replace the content of the source decision with assumptions beyond the thesis record.

Data were organized according to the three research questions and then examined by linking legal norms with concrete facts. The method emphasizes the fulfillment of criminal elements, the defendant's capacity and fault, the relevance of the *visum et repertum*, and the reasoning behind the selection of the third alternative charge. This structure permits the study to distinguish between the initial characterization of the event and the offense that the court actually declared proven.

2.2. Theoretical Foundations

Criminal responsibility is based on the principle that punishment requires more than the existence of a prohibited act. A person must be capable of responsibility, must be blameworthy for the act, and must not be protected by a justification or excuse that removes criminal liability. The source thesis uses this framework to assess whether the defendant could legally be held accountable for the conduct proven in court (Huda, 2018; Hiariej, 2016).

Assault and violence are related concepts but are not automatically identical in every criminal formulation. Assault focuses on conduct causing pain, injury, or impairment of health,

whereas violence can also function as a means to force another person to act, not act, or tolerate something. The alternative indictment in this case required the court to determine which legal construction corresponded most closely to the proven facts (Chazawi, 2018; Soesilo, 2019).

Proof in criminal proceedings must be constructed from legally recognized evidence and assessed in relation to the elements of the charged offense. Witness testimony, the defendant's statement, documentary evidence such as a *visum et repertum*, and material objects acquire legal significance when they mutually reinforce the chronology. The court's reasoning therefore depends on coherence among the forms of evidence rather than on a single statement standing alone (Harahap, 2012).

2.3. Legal Arrangements and Key Concepts

The source thesis places the Criminal Code and the Criminal Procedure Code as the principal legal framework for the case. Article 351 paragraph (1) appeared as the alternative assault charge, while Article 335 paragraph (1) point 1 was the provision ultimately found proven by the panel. The difference is material because the judgment treated violence as a means of unlawful coercion rather than convicting the defendant under the assault formulation.

An alternative indictment allows the court to choose the charge that is most consistent with the facts established at trial. This procedural form does not require every alternative to be proven simultaneously, but it requires clear judicial reasons for selecting one formulation and rejecting the others. In this case, the panel's selection of Article 335 paragraph (1) point 1 became the decisive legal basis for conviction.

The *visum et repertum* functions as documentary evidence explaining the victim's physical condition after the event. Its significance lies in connecting the reported violence with an objectively recorded injury, while its probative value is strengthened when consistent with witnesses, the defendant's account, and the physical object allegedly used. The source thesis therefore treats the medical report as one part of a broader evidentiary chain rather than as an isolated proof.

2.4. Parameters of Juridical Analysis

The juridical analysis uses four parameters: the existence of a prohibited act, the defendant's fault, the ability to be responsible, and the absence of grounds excluding punishment. These parameters are then tested against the specific elements of the offense selected by the panel and the evidence described in the judgment. The approach ensures that the conclusion on responsibility follows from the legal structure of the case.

The analysis also examines the causal and temporal connection between the confrontation, the movement of the *egrek* knife, and the injury suffered by the victim. Close temporal proximity alone is not sufficient unless the evidence shows how the defendant's action relates to the injury and the coercive situation. Accordingly, chronology, witness consistency, physical evidence, and medical findings are read as an integrated factual sequence.

Finally, sentencing is assessed separately from the establishment of guilt. The six-month sentence is compared with the prosecutor's eight-month demand only to explain that the panel independently weighed the circumstances after finding the offense proven. This parameter keeps the discussion focused on the legal reasoning contained in the source decision rather than treating sentencing length as proof of the offense itself.

3. Research Results

3.1. Criminal Liability of the Perpetrator

The research found that the defendant could be held criminally responsible because he was treated as a legal subject capable of understanding and answering questions about the event.

The trial record did not establish a mental or physical condition that eliminated his capacity to be responsible, and no justification or excuse was accepted by the panel. This allowed the court to attribute the proven conduct personally to the defendant.

The factual basis of responsibility included the confrontation after the oil-palm fruit incident, the presence and use of the *egrek* knife, the victim's wound, and the defendant's involvement at the scene. The court did not derive liability only from the injury because it also examined the defendant's conduct and the means used during the interaction. This combination supported the conclusion that the harmful consequence was connected with a blameworthy act.

The source thesis emphasizes that the defendant's responsibility remained individual even though the event arose from a broader dispute over the fruit. The earlier taking of the fruit explained the background, but it did not itself justify violence or remove the legal duty to refrain from coercive conduct. The panel therefore treated the surrounding dispute as context rather than as a ground eliminating responsibility.

The source judgment shows that criminal responsibility was assessed from the defendant's status as a legally accountable person and from the concrete sequence of conduct at the oil-palm plantation. The panel noted that Edi Pranata Samura was able to answer questions clearly and that no condition indicated an inability to understand or control his conduct, so the capacity element was not treated as problematic. This finding is important because the existence of a prohibited act alone does not justify punishment unless the offender can also be blamed for that act.

The evidentiary link between conduct and consequence was reinforced by the *visum et repertum* describing a scratch wound measuring approximately 1 cm by 0.1 cm at the base of the victim's right index finger caused by sharp-force trauma. That medical finding was read together with testimony concerning the sickle-like *egrek* knife, the defendant's movement, and the victim's attempt to hold the tool when it was directed toward him. By connecting the physical injury with the chronological account, the court was able to evaluate responsibility through converging evidence rather than through the victim's statement alone.

3.2. Application of the Elements of Violence or Assault

The application of the offense elements began with the alternative indictment submitted by the prosecutor. Although Article 351 paragraph (1) on assault was included, the panel found the third alternative under Article 335 paragraph (1) point 1 more consistent with the proven event. The critical element was unlawful coercion carried out by violence or threat of violence.

The evidentiary record supported the existence of violence through witness accounts, the defendant's statement, the *egrek* knife, and the *visum et repertum*. The medical record documented a scratch wound to the right index finger caused by sharp-force trauma, while the physical evidence provided a concrete link to the instrument involved in the confrontation. The court therefore relied on mutually supporting evidence rather than on the victim's statement alone.

The judgment also dealt with the status of the seized objects. The *egrek* knife was ordered destroyed, the two bunches of oil-palm fruit were returned to the lawful owner, and the Honda Scoopy motorcycle was returned to the defendant. These orders reinforce that the panel assessed the relationship of each object to the offense and to the rights of the relevant parties.

The alternative form of the indictment required the court to compare several possible legal qualifications against the facts proved at trial. Although one alternative charged ordinary assault under Article 351 paragraph (1) of the former Criminal Code, the panel ultimately considered the third alternative under Article 335 paragraph (1) point 1 to correspond more closely with the proven use of violence or threat of violence. The source thesis therefore emphasizes that criminal responsibility in this case must be understood through the offense actually declared proven, not merely through the title of the study or the wording of another alternative charge.

The source judgment also records that the defendant's possession of the egrek knife had to be evaluated in the context in which the object was used. An agricultural tool may be lawful in ordinary plantation activity, but its legal significance changes when it is raised or directed at another person during a confrontation and becomes part of a coercive act. This contextual assessment prevents the analysis from treating the object in isolation and instead connects the instrument, the defendant's words, the victim's reaction, and the resulting injury.

3.3. Judicial Considerations in Sentencing

The court's legal consideration started from the alternative indictment and the facts established through admissible evidence. The judges identified the third alternative charge as the provision whose elements were legally and convincingly proven, then examined whether any ground existed to exclude punishment. Because no such ground was established, the panel proceeded to sentencing.

The defendant received six months of imprisonment, which was lower than the prosecutor's demand of eight months. The decision also ordered the detention period to be fully deducted and the defendant to remain in custody. The difference between the demand and the sentence reflects an independent judicial assessment of proportionality within the case as recorded in the source thesis.

The result shows that judicial reasoning in an alternative indictment must explain not only why one charge is accepted but also why the factual construction fits that charge. The evidence of injury remained relevant even though the conviction was not based on Article 351 paragraph (1), because the injury formed part of the factual proof of violence. This demonstrates the need to separate the legal qualification from the evidentiary facts supporting it.

The court did not rely solely on the defendant's acknowledgment that an egrek knife was present at the scene, because the statement had to be tested against witnesses, physical evidence, and the medical report. This approach is consistent with the thesis's emphasis that a criminal judgment should emerge from the correspondence among lawful forms of proof rather than from a single confession or accusation. The evidentiary structure is especially relevant where the event developed rapidly and different participants may remember the position of the parties or the exact movement of the tool differently.

The source material also notes that the incident arose after an earlier dispute involving two bunches of oil-palm fruit, but that background did not by itself determine the defendant's criminal responsibility for the later violent conduct. The legally relevant inquiry remained whether the subsequent acts satisfied the chosen criminal provision and could be attributed to a responsible offender without a justification or excuse. Separating motive and background from the elements of the proven offense keeps the analysis focused on the conduct that the court actually punished.

4. Discussion

4.1. Analysis of Criminal Liability

The finding on responsibility is consistent with the doctrinal requirement that a criminal act and personal blameworthiness be established together. The court's conclusion that the defendant was capable of responsibility and not protected by a justification or excuse provided the normative bridge between the proven act and punishment. Without that bridge, the existence of a wound alone would not be enough to impose criminal liability.

The case also demonstrates why the factual background must not be confused with a legal excuse. The dispute over two bunches of oil-palm fruit may explain why the confrontation occurred, but the source thesis does not identify it as a circumstance that legally justified coercive violence. The defendant therefore remained answerable for the means he used during the confrontation.

Personal liability is further strengthened by the defendant's ability to provide a coherent account and by the consistency of the surrounding evidence. This does not mean that a defendant's statement alone proves guilt, because the court still tested it against witnesses, objects, and the medical report. The evidentiary convergence is what gives the responsibility finding its legal foundation.

The application of the elements must account for the temporal proximity between the arrival of the victim, the defendant's words, the raising of the *egrek* knife, the victim's defensive reaction, and the wound that followed. When these facts are placed in sequence, the violence is not treated as an abstract allegation but as a set of observable acts connected to a specific consequence. This chronological method also helps explain why the court could reject an analysis that fragmented the event into unrelated moments and instead evaluate the entire interaction as one legally relevant episode.

The size of the victim's wound was relatively limited, yet the source thesis correctly notes that criminal-law assessment is not determined only by the seriousness of the physical injury. The manner of using a sharp instrument, the threat created by its direction toward the victim, and the coercive character of the confrontation remain legally significant even when the visible injury is small. This distinction is important because the offense declared proven concerned coercive violence or threat of violence, so the quality of the act mattered alongside the measurable medical consequence.

4.2. Analysis of the Proven Elements

The most important analytical point is the court's choice of Article 335 paragraph (1) point 1 rather than the assault charge. This choice shows that the same physical event may be relevant to more than one offense formulation, but the conviction must rest on the formulation whose elements best match the facts. The judgment therefore illustrates the practical function of an alternative indictment.

The *visum et repertum* should be interpreted together with the other evidence rather than treated as a substitute for proving the defendant's act. A medical finding can show the nature of an injury, while witness testimony and physical evidence help identify how and by whom the injury occurred. The source thesis correctly links these evidentiary functions when explaining why the element of violence was accepted.

The orders concerning evidence also support a coherent legal treatment of the case. Destroying the *egrek* knife, returning the fruit to its owner, and returning the motorcycle to the defendant reflect different legal relationships between the objects and the offense. These orders demonstrate that a criminal judgment addresses not only guilt and punishment but also the lawful disposition of seized property.

The judge's legal reasoning also demonstrates the importance of distinguishing between the prosecutor's demand and the court's independent assessment. The prosecutor sought a heavier sentence, while the panel imposed six months of imprisonment after considering the proven facts and the circumstances relevant to punishment. The difference illustrates that sentencing is not a mechanical continuation of the indictment but a separate judicial evaluation of culpability, evidentiary certainty, and mitigating or aggravating circumstances.

The status of the physical evidence further shows that the court evaluated each object according to its connection with the offense and ownership. The *egrek* knife was ordered destroyed, the two bunches of oil-palm fruit were returned to their lawful owner, and the Honda Scoopy motorcycle was returned to the defendant rather than confiscated for the state. These different orders support the thesis's broader point that a criminal judgment addresses not only imprisonment but also the legal disposition of evidence according to its function in the event and its relationship with the parties.

4.3. Analysis of Judicial Considerations

The six-month sentence reflects the panel's authority to determine punishment independently after guilt has been established. The fact that the sentence was below the prosecutor's demand does not weaken the conviction, because the demand and the judgment perform different functions in criminal proceedings. The court remained obliged to state reasons grounded in the proven offense and the circumstances of the defendant.

A strong judgment in an alternative-indictment case should make the route from facts to elements visible to the reader. In this case, the key route runs from the confrontation and the egrek knife to the coercive conduct, the victim's injury, the supporting evidence, the absence of an exculpatory ground, and the final choice of Article 335 paragraph (1) point 1. That structure enables the decision to be assessed for legal coherence.

The broader implication is that legal analysis should follow the offense actually found proven rather than remain tied to the initial label of "assault." The source thesis itself recognizes this tension and treats the violence and injury as important facts while acknowledging the final legal qualification selected by the panel. This approach preserves accuracy and avoids overstating what the judgment decided.

The absence of a justification or excuse was an additional foundation for imposing criminal responsibility. The court considered the confrontation and the surrounding dispute but did not identify a circumstance that legally authorized or excused the defendant's use of violence or threat of violence. Accordingly, the finding of guilt rested on the combination of a proven prohibited act, blameworthiness, capacity for responsibility, and the absence of a ground excluding punishment.

The interview with the presiding judge on 12 May 2026 reinforces the methodological lesson of the case: facts proved in court must control the legal qualification. The judge explained that in an alternative indictment the court may select the charge that most accurately corresponds to those facts, which explains why the final conviction did not follow the assault alternative despite the presence of an injury. This case therefore illustrates how careful element-by-element analysis can produce a legal conclusion that differs from the label initially attached to the incident while remaining within the indictment submitted by the prosecutor.

The judgment's treatment of the defense evidence is also important for assessing the quality of the reasoning. The defendant and counsel were permitted to present a defense and mitigating witness, but the panel compared that material with the victim's account, other witness testimony, the visum, and the physical evidence before deciding which factual version was most consistent with the whole evidentiary record. This demonstrates that respecting the right of defense does not require the court to accept every exculpatory assertion, but it does require the reasons for rejecting or limiting such assertions to be connected with stronger and mutually supporting evidence.

The case also reveals the practical value of separating the determination of guilt from the determination of sentence. Once the panel concluded that the third alternative charge was proved and that no justification or excuse applied, it still had to assess the appropriate punishment in light of the defendant's circumstances, including factors recorded as mitigating such as the absence of a prior conviction. This two-stage logic helps maintain proportionality because a defendant can be fully criminally responsible for the proven offense while still receiving a sentence below the prosecutor's demand when the court finds that the overall circumstances justify a lower term.

Another important feature of the case is the distinction between the existence of an injury and the legal characterization ultimately selected by the panel. The visum established a physical consequence, but the court still had to determine whether the overall conduct was better captured by the assault alternative or by the provision concerning coercion through violence or threat of violence, so the medical evidence functioned as one part of the factual matrix rather than as an automatic determinant of the offense. This distinction confirms the thesis's central

argument that legal qualification must be derived from the complete pattern of words, gestures, weapon use, victim reaction, and injury, because the same physical wound can have different juridical significance depending on the way it was produced and the purpose served by the violent act.

The sequence surrounding the two bunches of oil-palm fruit also illustrates why a court must preserve the boundaries of the charge being assessed. The earlier dispute helps explain why the parties encountered one another and why the confrontation escalated, yet the criminal responsibility examined in the judgment turns on the defendant's later conduct with the *egrek* knife and not on a general moral assessment of the entire conflict at the plantation. By separating contextual background from the precise conduct satisfying the proven alternative charge, the reasoning remains legally disciplined and allows the reader to see which facts merely explain the event and which facts actually establish the elements required for conviction.

5. Conclusion

Criminal liability in Case Number 162/Pid.B/2025/PN Stabat was imposed because the defendant was considered capable of responsibility, his conduct was established through trial evidence, and no justification or excuse removed his blameworthiness. The court treated the confrontation and the use of the *egrek* knife as a legally relevant sequence connected with the victim's injury. Liability therefore rested on the combination of act, fault, capacity, and evidentiary support.

The court did not convict the defendant under the alternative assault charge in Article 351 paragraph (1), but under Article 335 paragraph (1) point 1 concerning unlawful coercion by violence or threat of violence. Witness testimony, the defendant's statement, the *egrek* knife, the *visum et repertum*, and other material evidence formed the basis for finding the elements proven. This distinction between factual violence and the final legal qualification is essential to an accurate reading of the judgment.

The judicial considerations culminated in a sentence of six months of imprisonment, lower than the prosecutor's eight-month demand, together with orders regarding detention and seized property. The decision demonstrates that sentencing follows an independent assessment after the offense has been proven and that evidence must be linked systematically to the selected alternative charge. The principal implication is the need for clear judicial reasoning whenever one of several alternative indictments is chosen.

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