

Research Article

Legal Review of Criminal Punishment of Perpetrators of the Criminal Acts of Theft with Violence Based on Social Justice (Decision Study Number: 470/Pid.B/2024/PN.Mtr)

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ORCIDEdwin Isa Mahendra: <https://orcid.org/0000-0002-1315-4696>**Abstract.**

This study examines the punishment of perpetrators of violent theft based on social justice, with the focus on Decision Number: 470/Pid.B/2024/PN.Mtr. The main issues raised are how the punishment process is applied, what are the weaknesses and solutions, and how judges consider making decisions. Indonesia as a country of law upholds the principles of justice and the supremacy of law, but crime, including violent theft, is still a serious challenge due to social pathologies such as economic inequality and lack of legal awareness. This study uses a normative juridical method with a descriptive analysis approach, collecting data from primary, secondary, and tertiary legal materials through literature studies and document studies. Data are analyzed qualitatively with deductive logic. The results of the study show that the judge's decision tends to be formalistic and retributive, paying less attention to aspects of victim restitution and the socio-economic background of the perpetrator. The obstacles include the lack of normative guidelines, social pressure, and the lack of alternative sanctions oriented towards restorative justice. The solution includes the implementation of comprehensive restitution, checking the social background of the perpetrator, and systematically integrating a restorative approach to realize substantive justice that is more humane and in line with social justice.

Keywords: criminalization, judge's decision, social justice, violent theft

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1. Introduction

Indonesia is a country of law that is committed to the principles of law to maintain justice and peace, as stated in Article 1 paragraph (3) of the 1945 Constitution after the fourth amendment. The supremacy of law is very important in every violation, and the administration of justice must be based on Pancasila and the 1945 Constitution. Law in Indonesia functions to regulate relations between individuals and the state, create peace, justice, and guarantee equality before the law.



Crime is a serious problem that threatens social and economic stability. Cooperation between the government and society is needed to reduce its intensity. Social pathology, which includes economic problems and deviations from norms, contributes to the emergence of crime. One form of crime that often occurs in Indonesia is theft. Although clearly regulated in the Criminal Code Articles 362 to 367, cases of theft, including violent theft, continue to increase with various modes of operation, even involving violence and firearms, which are very disturbing to society. Violent theft, in which the perpetrator uses threats or physical actions, is often triggered by economic factors, low education, unemployment, and lack of legal awareness. This act is contrary to religious norms, morals, decency, and law, and endangers society.

This study raises the case of Case Decision Number 470/Pid.B/2024/PN.Mtr, concerning the crime of theft with violence committed by BASOFI IRWAN alias IRWAN on July 7, 2023 in Mataram. The perpetrator and his partner SUHARIADI alias SUHAR, used a motorbike to chase the victims LUNA ULIYA MUTMAINATUL QULUB and NIKMATUL AINI. Irwan forcibly pulled Luna's cellphone, causing the two victims to fall and be injured, with a loss of IDR 6,000,000, and Nikmatul Aini was unable to do activities for about 3 weeks. Based on this description, this study aims to analyze how the social justice-based criminalization process is applied, identify weaknesses and solutions, and evaluate the judge's considerations in the decision.

Theoretically, this research is expected to provide benefits and references for the development of science in the field of law, especially regarding the law enforcement of violent theft. Practically, it is expected to provide a contribution of thought in building law enforcement in Indonesia, especially the problem of violent theft, as well as increasing knowledge and insight for lawmakers and law enforcement officers. The conceptual framework of the research includes the understanding of legal analysis, punishment, perpetrators of criminal acts, violent theft, and social justice, as a basis for understanding in analyzing this case. The theoretical framework will discuss the theory of punishment (absolute, relative, combined), the theory of law enforcement, and the theory of Pancasila justice as a philosophical and operational basis.

1.1. THEORETICAL BASIS

1.1.1. Overview of Criminal Acts

a) Definition of Criminal Law

Criminal law is a branch of public law that regulates prohibited acts and their sanctions to maintain public order and protect legal interests. According to Moeljatno, criminal law regulates prohibitions that if violated will be subject to sanctions. Criminal law has a public nature, its implementation is the authority of the state, not merely revenge, but to protect public interests and prevent crime. Based on the principle of legality (*nullum crimen sine lege, nulla poena sine lege*), it guarantees legal certainty. In its development, criminal law is dynamic and responsive, towards more humane punishment such as restorative justice. Barda Nawawi Arief added a preventive function in addition to repressive. Principles such as the presumption of innocence and proportionality ensure that the legal process is not arbitrary.

2) Criminal Elements in Indonesia

An act can be categorized as a crime if it fulfills objective and subjective elements.

- **Objective Elements:** Concerning the act itself and circumstances outside the perpetrator. Includes the act (*actus reus*), consequences, causal relationships, and objects of the crime. This element must be proven concretely through valid evidence.
- **Subjective Element:** The inner aspect or mental attitude of the perpetrator, reflecting guilt (*schuld*). Includes intent (*dolus*) and negligence (*culpa*). According to Sudarto, guilt is the main element in criminal responsibility (*geen straf zonder schuld*).
- **Unlawful Acts:** Criminal acts must be against the law, both formally and materially.
- **Responsible Ability:** The perpetrator must have the legal ability to be responsible, not be mentally disturbed (Article 44 of the Criminal Code).

1.1.2. Overview of Theft

The crime of theft is a common crime against property, regulated in Article 362 of the Criminal Code. Its elements include: taking someone else's property, with the intention of possessing it unlawfully. The goods must be movable, tangible, and have economic value. Intention (*mens rea*) is important. The act must be unlawful. Aggravated theft (Article 363) and theft with violence (Article 365) are special forms. The purpose of criminal punishment in theft is a deterrent effect, protection of society, and creating justice.

1.1.3. Overview of Violent Theft

a) Understanding Violence in Indonesia

Violence is an act that can cause physical, psychological, sexual, or economic suffering. The Criminal Code links it to abuse. The Domestic Violence Law (No. 23 of 2004) classifies it into physical, psychological, sexual, and domestic neglect. The Child Protection Law (No. 35 of 2014) also contains provisions on violence against children. Article 28G paragraph (1) of the 1945 Constitution guarantees self-protection and a sense of security. Violence occurs due to unequal power relations. The state is obliged to provide effective protection through the legal system and preventive efforts.

b) Violent Theft in Criminal Perspective

Regulated in Article 365 paragraph (2) 2 of the Criminal Code. The elements fulfilled in this case are: taking Luna Uliya's cellphone, carried out with violence (forcible pulling, kicking the motorbike until the victim fell and was injured), carried out by two or more people (the defendant and Suhariadi), and there was a loss (Rp. 6,000,000) and physical injury to the victim (unable to do activities for 3 weeks). The judge declared the defendant guilty and sentenced him to 5 years in prison.

1.1.4. Overview of Criminal Responsibility

Criminal liability is the core of substantive criminal law, determining whether the perpetrator can be held accountable. Simons defines it as the ability of a person to be legally responsible for his actions. Requires an unlawful act (*actus reus*) and a mistake (*mens rea*) cumulatively. The principle of *geen straf zonder schuld* (no crime without fault) is the basis. It is important that there are no justifications (*rechtvaardigingsgronden*) or excuses (*schulduitsluitingsgronden*).

1.1.5. Overview of the Definition of Social Justice

Social justice is a basic principle of the purpose of law in Indonesia, stated in the fifth principle of Pancasila: Social Justice for All Indonesian People. This means equal treatment before the law and fair distribution of rights, obligations, and resources. The law must protect the common interest, especially vulnerable groups. Social justice also means that everyone is treated equally without discrimination, but taking into account

the social background of the perpetrator and victim, for example through restorative justice.

1.1.6. Review of Theory of Theft in Islamic Law

a) Definition of Theft in Islamic Law

Known as as-sariqah, taking other people's property secretly without right. Included in the hudud crimes, the punishment is strictly determined in the Qur'an (QS. Al-Mā'idah: 38). The main elements: taking other people's property, from a legitimate storage place (hizr), secretly, and with the intention of permanently owning it. The punishment of cutting off the hand (ḥadd sariqah) is imposed if the value of the property reaches the nisab (a quarter of a dinar or around 4.25 grams of gold).

b) Prophet's Hadith on Theft

The Messenger of Allah ﷺ emphasizes the prohibition of theft. The hadith "A person's hand is cut off for stealing a quarter of a dinar" determines the nisab. Another hadith shows that the application of the law should not be discriminatory, "if Fatimah bint Muhammad stole, I would certainly cut off her hand myself". The punishment of cutting off the hand serves a preventive function. The conditions for implementing ḥadd are strict, for example not in an emergency.

c) Elements of Theft According to Islamic Law

For hudud, the following elements must be fulfilled: the perpetrator is of sound mind and mature, the stolen goods must reach the nisab, the property is taken from a safe place (hizr), it is done secretly, the property is legally owned by another person, and it is not in a state of necessity/urgent need.

- Nisab in Theft: The minimum value of stolen goods for hudud is a quarter of a gold dinar.
- Types of Punishment: Hudud vs Ta'zir: Hudud is a fixed punishment from the text of the Qur'an/Hadith, while ta'zir is a punishment submitted to the judge's ijtihad if the hudud conditions are not met.
- The purpose of the law on theft in Islam: To protect property (hifzhul mal), uphold justice, prevent crime, provide a deterrent effect, and show support for legitimate property rights.

2. Methods

This study uses a normative research method, namely a literature study or secondary data, to analyze the punishment of perpetrators of violent theft based on social justice in Decision Number: 470 / Pid.B / 2024 / PN.Mtr. The research specification is descriptive analysis, aiming to provide an overview of the problem by referring to relevant laws and theories.

The main data source is secondary data, which consists of:

- Primary Legal Materials: UUD NRI 1945, Law No. 8 of 1981 (Criminal Procedure Code), Law No. 48 of 2009 (Judicial Power), Law No. 1 of 2023 (Criminal Code), and Decision Number: 470/Pid.B/2024/PN.Mtr.
- Secondary Legal Materials: Books, journals, and legal reports that explain primary legal materials.
- Tertiary Legal Materials: Legal dictionaries and encyclopedias.

Data collection was conducted through literature study and documentary study. The collected data were analyzed qualitatively using deductive logic, interpreting laws from various sources to draw conclusions.

3. Result and Discussion

3.1. Social Justice-Based Criminalization Process for Perpetrators of Violent Theft

The crime of theft with violence (Article 365 of the Criminal Code) is a serious crime that attacks the property rights and physical safety of the victim. The law enforcement process includes investigation, prosecution, and trial in court, which must pay attention to justice and protection of rights.

1) Investigation Stage

The police conduct an investigation to collect evidence and determine the suspect. This stage includes receiving reports, collecting evidence, determining the suspect, detention, examining the suspect, and transferring the files to the prosecutor.

2) Prosecution Stage

The Public Prosecutor (JPU) charges the suspect in court after the file is declared complete (P-21). The prosecutor reviews the evidence and can detain the suspect. Prosecution ensures justice for the victim, the perpetrator, and the community.

3) Court Hearing and Decision

Judges examine cases objectively, test the truth of legal facts, and consider evidence. The verdict is made according to the facts and applicable law, which can be in the form of imprisonment, a fine, or additional punishment. Judges can also use the principle of individualization of criminal penalties. In the verdict, the judge considers the legal aspects (elements of the crime) and non-legal aspects (motive, socio-economic background, impact of the act), this is where social justice can be included.

3.2. Weaknesses and Solutions of the Social Justice-Based Criminal Process for Perpetrators of Violent Theft Crimes Study of Decision Number: 470/Pid.B2024/PN.Mtr

1. Chronology of Decision Number: 470/Pid.B2024/PN.Mtr

On July 7, 2023, Basofi Irwan and Suhariadi stole Luna Uliya's cellphone in Mataram, causing the victim to fall and get injured, with a loss of Rp. 6,000,000. Irwan was arrested and admitted his actions. The judge found Irwan guilty (Article 365 paragraph (2) 2 of the Criminal Code) and sentenced him to 5 years in prison.

2. Analysis of Weaknesses of Social Justice-Based Criminal Procedure Process

This decision shows the weaknesses in the application of social justice:

- **Restitution and Victim Recovery Aspect:** Only orders the return of evidence, without restitution/compensation for physical injuries and suffering of the victim.
- **No Consideration of the Socio-Economic Background of the Perpetrator:** The verdict focuses on formal legal facts without revealing the background of the accused.
- **Absence of a Restorative Approach:** The judicial process is only repressive (prison sentences), without any attempt at dialogue, mediation, or restoration of social relations.
- **Imprisonment Verdict Without Rehabilitation Program:** Imposing a prison sentence without a rehabilitation program or social reintegration.

These decisions tend to be formalistic and retributive, paying little attention to the recovery of victims and the socio-economic conditions of perpetrators.

3. Social Justice Based Criminal Procedure Solution

- **Application of Restitution to Victims:** The court should order compensation for physical injuries and material losses, based on Article 98 of the Criminal Procedure Code and the Witness and Victim Protection Law.
- **Social Background Check of the Perpetrator:** Judges should consider structural factors (poverty, education, peer pressure) that may be the driving force behind the crime, in accordance with the principles of distributive justice of Pancasila.
- **Restorative Approach Integration:** Implementing offender-victim dialogue programs, penal mediation, or social activities in correctional institutions.

3.3. Judge's Considerations in Handing Down a Verdict Against the Perpetrator of the Crime of Theft with Violence in Verdict Number: 470/Pid.B2024/PN.Mtr

The judge sentenced Basofi Irwan to 5 years in prison based on Decision No. 470/Pid.B/2024/PN Mtr, because he was legally and convincingly proven to have committed theft with violence (Article 365 paragraph (2) 2 of the Criminal Code).

1. Legal Considerations

Based on valid evidence according to Article 184 of the Criminal Procedure Code:

- **Victim's witness statement:** The perpetrator aggressively grabbed the cellphone, causing the victim to fall and get injured.
- **Defendant's statement:** Admitted to being at the location and taking the cellphone.
- **Evidence:** The victim's iPhone 7 Plus was found on the defendant.

Reconstruction of the incident: Strengthening the existence of violence during the robbery. The judge assessed that the elements of the crime in Article 365 paragraph (2) 2 of the Criminal Code were fulfilled.

2. Weighing Considerations

- The act was carried out in a public space (highway), causing social unrest and fear.
- The victims were two women, a vulnerable group, giving rise to serious psychological dimensions.
- Violence causes physical injury to the victim.

3. Mitigating Considerations

- The defendant was cooperative, admitted his actions, and expressed regret.
- The defendant has no prior convictions and is well-mannered. However, the judge did not delve into the defendant's socio-economic background.

4. Absence of Social Justice Consideration

- The verdict lacks social sensitivity, does not investigate the structural and social factors driving the crime. This shows that judges are still trapped in legal positivism.

4. Conclusion

1). Social Justice-Based Criminal Procedure for Perpetrators of Violent Theft. The criminalization process must go beyond the formal legal aspects. The court needs to include socio-economic considerations and the perpetrator's background so that the decision is not only repressive, but also favors recovery, social reintegration, and substantive justice. This is important to prevent recurrence of crimes and support the rehabilitation of the perpetrator. 2). Weaknesses and Solutions of the Social Justice-Based Criminal Process for Perpetrators of Violent Theft Crimes Study of Decision Number: 470/Pid.B2024/PN.Mtr. Decision Number 470/Pid.B/2024/PN.Mtr shows formalistic and repressive weaknesses, paying little attention to victim recovery, the perpetrator's socio-economic background, and a restorative approach. Solutions include fair restitution for victims, a thorough examination of the perpetrator's socio-economic background, and the integration of restorative justice and rehabilitation programs. 3). Judge's Considerations in Handing Down a Verdict Against a Perpetrator of the Crime of Theft with Violence in Verdict Number: 470/Pid.B2024/PN.Mtr. The judge's considerations are based on valid legal evidence that fulfills the elements of a criminal act (Article 365 paragraph (2) 2 of the Criminal Code). Aggravating factors (widespread impact of the crime, vulnerable victims) and mitigating factors (cooperative, confession) are considered, but without delving deeply into the perpetrator's socio-economic background. This shows a focus on legality and formal evidence without integrating social justice.

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