

DETERMINATION OF SUSPECTS IN CORRUPTION CRIMES BY POLICE INVESTIGATORS FROM A DUE PROCESS OF LAW PERSPECTIVE

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ABSTRACT

The extensive authority of Police investigators in determining suspects of corruption crimes often intersects with issues of arbitrariness and fundamental human rights protection. This study aims to analyze the reconstruction of suspect determination procedures based on Law Number 20 of 2025 concerning the Criminal Procedure Code concerning the Criminal Procedure Code and its juridical implications. As a theoretical and practical reference for legal practitioners, this research underscores the urgency of procedural compliance to ensure legal certainty. Employing normative legal research with statute and conceptual approaches, the discussion highlights a paradigm shift from broad discretion to mandatory scientific evidence, specifically requiring definitive state loss audits and "Special Case Exposure" involving external experts. The analysis confirms that the validity of suspect determination strictly depends on these limitative boundaries. The conclusion asserts that any violation constitutes an excess of power, rendering the suspect status null and void and the evidence invalid (*fruit of the poisonous tree*). Consequently, this research suggests that law enforcement must strictly adhere to these procedural safeguards to uphold the supremacy of due process in corruption eradication.

Keywords: Determination of Suspects, Corruption Crimes, Police Investigators, Due Process of Law.

INTRODUCTION

Corruption remains classified as an extraordinary crime that undermines the foundations of the economy and public trust in state officials.¹ In the effort to eradicate corruption, the role of investigators from the Indonesian National Police becomes the frontline in law enforcement functions.² The authority of investigators in searching for and collecting evidence to clarify a criminal act is a vital instrument in the criminal justice

¹ Mulyadi Mulyadi and Elvira Fitriyani Pakpahan, "Implementation Of Corruption Criminal Sanctions Againsts Country Officers Who Conducted Criminal Act Of Corruption During Covid 19," *Jurnal Hukum dan Peradilan* 10, no. 2 (2021): 219–228.

² Angkasa Angkasa et al., "Illegal Online Loans in Indonesia: Between the Law Enforcement and Protection of Victim," *Lex Scientia Law Review* 7, no. 1 (2023): 119–178.

system.³ However, this extensive authority carries the risk of abuse of power if not accompanied by strict control mechanisms, especially at the most crucial stage for human rights, namely the determination of suspects.⁴

The status of a suspect is not merely an administrative label in the legal process, but rather a designation that carries massive legal and social consequences. Someone designated as a suspect in a corruption crime often immediately experiences civil death, where their reputation is destroyed, access to economic assets is frozen, and their career is halted, even before a legally binding court decision (*inkracht van gewijsde*) is made.⁵ Therefore, the principle of presumption of innocence must be strictly upheld through accountable and transparent suspect designation procedures.⁶

Before the implementation of the latest regulations, there were often legal debates regarding the standard of sufficient preliminary evidence.⁷ The ambiguity of qualitative and quantitative parameters in the old regulations, such as the Criminal Procedure Code, often leads to disparities in law enforcement. Investigators have been seen to have excessive discretion in interpreting "initial evidence," sometimes based solely on witness statements that may not be valid or on calculations of potential state losses. This condition triggers a large number of pretrial lawsuits filed by justice-seeking citizens as a form of resistance against the arbitrariness of law enforcement officials and to question the legality of suspect determination.⁸

Responding to that dynamic, the lawmakers have enacted Law Number 20 of 2025 concerning the Criminal Procedure Code concerning the Criminal Procedure Code. This law is presented as a *lex specialis* or at least as a significant reform of procedural law, aimed at reducing the subjectivity of investigators.⁹ The presence of this law is expected to balance

³ Alamsyah Bahari, "Advocate Assistance Against Witnesses Toward The Suspected in The Investigation Process of Corruption Criminal Act," *JPH* 7, no. 1 (2020).

⁴ Dwi Prasetyo and Ratna Herawati, "Tinjauan Sistem Peradilan Pidana Dalam Konteks Penegakan Hukum Dan Perlindungan Hak Asasi Manusia Terhadap Tersangka Di Indonesia," *Jurnal Pembangunan Hukum Indonesia* 4, no. 3 (2022): 402–417.

⁵ Robiatul Adawiyah and Umi Rozah, "Indonesia's Criminal Justice System with Pancasila Perspective as an Open Justice System," *Law Reform* 16, no. 2 (2020): 149–162.

⁶ Benny Sumardiana, Pujiyono Pujiyono, and Irma Cahyaningtyas, "Reforming Justice: Unpacking the Prejudication and Post-Judicate Dynamics of the Sarpin Case in Law and Practice in Indonesia," *Lex Scientia Law Review* 8, no. 2 (2024): 1089–1116.

⁷ Robiatul Adawiyah and Evi Retno Wulan, "Keabsahan Penetapan Tersangka Dalam Peraturan Kapolri No 6 Tahun 2019 Tentang Penetapan Tersangka," *Iblam Law Review* 4, no. 1 (2024): 478–495.

⁸ Nurbaedah Nurbaedah, "Juridical Study of Reforming the Criminal Procedural Law System Regarding Pretrial Institutions after Constitutional Court Decision in Indonesia," *Jurnal Akta* 9, no. 2 (2022): 141–156.

⁹ Hamdan Rampadio, Ana Fauzia, and Fathul Hamdani, "The Urgency of Arrangement Regarding Illicit Enrichment in Indonesia in Order to Eradication of Corruption Crimes by Corporations," *Jurnal Pembaharuan Hukum* 9, no. 2 (2022).

the effectiveness of combating corruption with the protection of human rights. This regulation brings a new paradigm in the procedures for determining suspects, which demands more rigid and measurable standards of proof before someone can be designated as a suspect.

At the level of implementation, which has only recently begun since its enactment, there are still fundamental questions regarding how these authority limits will be operationalized in the field. Police investigators are now faced with a narrower yet sharper legal corridor. The main challenge is no longer just finding out who the perpetrator is, but ensuring that the determination process meets all the formal and material elements outlined in Law Number 20 of 2025 concerning the Criminal Procedure Code without violating the constitutional rights of citizens.¹⁰

The above steps must be taken to ensure that the principle of due process of law is truly implemented. Due process of law is a fundamental principle in the legal system that requires that every legal process be carried out fairly, impartially, and in accordance with procedures established by law, so that the human rights of every individual are protected from arbitrary actions by the state or law enforcement officials.¹¹

The legal issues that arise can then be narrated in the problem formulation that focuses on the regulatory framework, the limiting boundaries of authority, and the legal consequences. Specifically, this research questions how the regulation of police investigators' authority in determining suspects of corruption offenses based on Law Number 20 of 2025 concerning the Criminal Procedure Code, and how these authority limits are constructed to prevent arbitrariness. Furthermore, the urgency to examine the legal implications if investigators exceed those authority limits becomes highly relevant to discuss for the sake of legal certainty.¹²

This research aims to deeply analyze the new legal framework brought by Law Number 20 of 2025 concerning the Criminal Procedure Code concerning the authority of Polri investigators. In addition, this research aims to map the legal limitations that investigators must adhere to when handling corruption cases, as well as to identify the legal consequences of procedural violations. Theoretically, this paper is expected to contribute to the

¹⁰ Puspita Ratnasari and Adya Paramita Prabandari, "Legal Protection of the Rights of Suspects in Criminal Case Investigation Process in Human Rights Perspective," *International Journal of Social Science And Human Research* 5 (2022).

¹¹ Oksana Khablo and Ivo Svoboda, "International Standards for the Application of the Presumption of Innocence in Criminal Proceedings," *Naukovij Visnik Nacional'noi Akademii Vnutrišnih Sprav* 29, no. 1 (February 2024): 55–65, <https://doi.org/10.56215/naia-herald/1.2024.55>.

¹² A C Irawati and H Wijaya, "Advancing Justice: Embracing a Progressive Legal Framework for Case Resolution in Central Java Police Criminal Investigation (A Case Study at Polda Ditreskrimsus)," *International Journal of Multicultural and Multireligious Understanding* 10, no. 12 (2023): 315.

development of criminal procedural law in Indonesia, particularly regarding evidentiary law.¹³

This research is expected to serve as a guide or reference for legal practitioners, including police investigators, public prosecutors, and advocates, in understanding the new standards for suspect determination. For the public, this article provides insights into the protection of human rights in the criminal justice process. A comprehensive understanding of these authority limitations is crucial for creating a clean, authoritative, and trustworthy judicial system.

The literature review in this study refers to the Due Process of Law theory, which requires a fair and proper legal process.¹⁴ The theory of authority in administrative law is also used as an analytical tool to dissect the legitimacy of the investigator's actions. Furthermore, the principles of human rights contained in international instruments as well as the national constitution serve as the foundation for assessing the proportionality of coercive actions taken by police investigators in handling corruption cases.

Through this background, the urgency to examine these authority limits becomes unavoidable. The change in the legal landscape with the enactment of Law Number 20 of 2025 concerning the Criminal Procedure Code demands an academic study capable of explaining the paradigm shift from "pursuing confessions" or "minimal evidence" to proof based on rigorous scientific crime investigation. The balance between the crime control model and the due process model becomes the central point of discussion in this article.

METHOD

This research is a normative legal research that focuses on the inventory and analysis of positive law and applicable legal principles.¹⁵ The approach used is a statute approach by examining Law Number 20 of 2025 concerning the Criminal Procedure Code as the main legal instrument, and a conceptual approach to understand the doctrine of authority and human rights. The data sources used are secondary data consisting of primary legal materials in the form of laws and regulations, secondary legal materials in the form of literature, academic journals, and previous research results, and tertiary legal materials. The data collection technique is carried out through library research, which is then analyzed

¹³ Eko Iswahyudi, "Human Rights and Legal Reforms in Indonesia: Challenges and Progress," *The Journal of Academic Science* 2, no. 2 (2025): 734–743.

¹⁴ Febryan Alam Susatyo and Muchlas Rastra Samara Muksin, "Constructing the Concept of Commissioner Judge in Enforcing the Exclusionary Rules Principle in Indonesia," *Justisi* 10, no. 3 (2024): 505–517.

¹⁵ Yati Nurhayati, Ifrani Ifrani, and M Yasir Said, "Metodologi Normatif Dan Empiris Dalam Perspektif Ilmu Hukum," *Jurnal Penegakan Hukum Indonesia* 2, no. 1 (2021): 1–20.

qualitatively to produce argumentative and logical legal prescriptions to answer the legal issues raised.¹⁶

DISCUSSION

Reconstruction of the Procedure for Determining Suspects in Corruption Crimes Based on Scientific Evidence in the Criminal Justice System

Analysis of the procedure for determining suspects in corruption crimes in the current context cannot be separated from the shift in the paradigm of procedural law following the enactment of Law Number 20 of 2025 concerning the Criminal Procedure Code. Procedurally, this regulation reconstructs the authority of police investigators from previously broad discretionary to bound authority (*gebunden bevoegdheid*) by scientific standards of evidence (scientific crime investigation). In current law enforcement practices, the validity of determining a suspect no longer relies solely on the fulfillment of two conventional pieces of evidence as stipulated in the old Criminal Procedure Code, but rather requires a definitive, final, and binding audit of state losses from an authorized state auditor. This procedural change emphasizes that the accuracy of financial data is now an imperative formal requirement that must be met before investigators can proceed to the more repressive *pro-justitia* stage.

The dynamics of corruption eradication in Indonesia entered a new phase with the enactment of Law Number 20 of 2025 concerning the Criminal Procedure Code. This law was enacted in response to the urgent need to standardize law enforcement procedures, often considered open to multiple interpretations.¹⁷ In the context of the authority of police investigators, this law fundamentally reconstructs the formal and material requirements for determining a suspect. Whereas in the previous legal regime, the phrase "sufficient preliminary evidence" was often interpreted simply as possessing at least two pieces of evidence, as stipulated in Article 184 of the Criminal Procedure Code, without further explanation regarding the quality of that evidence, Law Number 20 of 2025 concerning the Criminal Procedure Code provides stricter, more qualitatively measurable limitations.

The regulation of investigators' authority in this law emphasizes that determining a suspect in corruption cases can no longer be based solely on potential state losses. Police investigators are now required to obtain final and binding investigative audit results from an authorized institution such as the Supreme Audit Agency or a state auditor recognized by law before determining suspect status. This shifts the investigative paradigm from an aggressive,

¹⁶ Achmad Irwan Hamzani et al., "Legal Research Method: Theoretical and Implementative Review," *International Journal of Membrane Science and Technology* 10, no. 2 (2023): 3610–3619.

¹⁷ Sahat Maruli Tua Situmeang, "Presence of Pretrial in the Perspective of the Pancasila State of Law," *Law Reform* 17, no. 2 (2021).

inquisitorial approach at the outset to a more prudent one, prioritizing the accuracy of financial data. Investigators' authority is limited by the principle of actual loss, where state losses must be real and definite, not merely estimates or unverified potentials.¹⁸

Law Number 20 of 2025 concerning the Criminal Procedure Code also regulates an internal checks and balances mechanism through the mandatory implementation of a Special Case Review before naming a suspect. This process is designed to minimize subjectivity and ensure that the legal constructions established by investigators simultaneously meet the elements of *mens rea* (malicious intent) and *actus reus* (criminal act). Investigators' authority is no longer solely and absolutely vested in an individual investigator or small team, but rather must undergo an examination involving the investigative supervisory function and, in certain cases, independent experts. Philosophically, this limitation aims to protect citizens from the criminalization of policies or administrative errors that are forced into the criminal realm.¹⁹

The implication of this regulation is that police investigators no longer have the discretion to use weak "indicative evidence" as the basis for naming suspects. This law requires a strong causal correlation between the unlawful act committed and the resulting state losses. Investigators are limited in their authority to not enter the realm of public officials' policy discretion as long as no kickbacks or bribes are found that benefit themselves or others. Thus, the limits of investigators' authority in Law Number 20 of 2025 concerning the Criminal Procedure Code can be understood as a clear demarcation line between administrative errors (maladministration) and criminal liability for corruption. The implementation of stricter standards for suspect determination aims to uphold the principle of presumption of innocence and protect human rights against arbitrary actions by law enforcement officials.²⁰

Implementation of the Due Process of Law Principle Through the Special Case Exposure Mechanism as a Test of Material Objectivity

The application of the principle of due process of law in the determination of corruption suspects by police investigators is manifested through the institutionalization of an objective and participatory oversight mechanism. Within the framework of Law Number

¹⁸ Anwar Sadat, "The Application of the State Financial Losses' Assessment in Corruption Crime after the Verdict of the Constitutional Court No. 31/Puu-x/2012," *Indonesian Journal Of Sustainability* 1, no. 1 (2022): 1–27.

¹⁹ Setia Untung Arimuladi, "Access to Justice Based on Expert Testimony in Tax Crimes: An Integrated Criminal Justice System Perspective in Indonesia," *Pandecta Research Law Journal* 17, no. 1 (2022): 29–36.

²⁰ Jenny Roberts, "Too Little, Too Late: Ineffective Assistance of Counsel, the Duty to Investigate, and Pretrial Discovery in Criminal Cases," *Fordham Urb. LJ* 31 (2003): 1097.

20 of 2025 concerning the Criminal Procedure Code, this principle is operationalized through the mandatory implementation of Special Case Exposure, which involves not only internal investigators but also independent experts and external auditors. This mechanism serves as an instrument for testing objectivity to ensure that the legal construction has precisely fulfilled the elements of mens rea and actus reus, while minimizing investigator subjectivity. Thus, due process of law is not only interpreted as administrative compliance, but also as a bulwark against human rights protection that prevents the criminalization of policies or maladministration being forced into the criminal realm

The most fundamental reform introduced by Law Number 20 of 2025 concerning the Criminal Procedure Code is the elevation of the "Special Case Title" from a mere internal police standard operating procedure to an imperative legal norm.²¹ Prior to the enactment of this regulation, the case title was often viewed as a closed internal mechanism vulnerable to command intervention. However, Article 45 paragraph of Law Number 20 of 2025 concerning the Criminal Procedure Code expressly mandates that the determination of a suspect in a corruption crime must be preceded by the Special Case Title mechanism. This transformation shifts the nature of the case title from administrative compliance to a statutory requirement. The absence of this stage not only violates professional ethics but automatically invalidates the validity of the designated suspect status, making it a fatal formal flaw from a criminal procedural law perspective. This highlights the growing emphasis on procedural legality and human rights protection in the Indonesian criminal justice system, particularly in suspect determination.²²

Substantially, the Special Case Title mechanism under Law Number 20 of 2025 concerning the Criminal Procedure Code is designed as an objective examination forum to test the strength of evidence before investigators proceed to the more repressive pro-justitia phase. This law regulates the composition of participants in case briefings to be more inclusive and independent. Unlike past practices dominated by investigators handling the case, this new regulation requires the presence of elements from the Investigation Supervisory Agency and the Legal Division, and most crucially the involvement of independent criminal law experts and external forensic auditors.²³ The presence of these external parties serves as a counterbalance to prevent tunnel vision or the "horse-eyed"

²¹ Cindy Destiani et al., "Etika Profesi Polisi Republik Indonesia Sebagai Perangkat Penegak Hukum Dan Pelayanan Publik," *Jurnal Pengabdian West Science* 2, no. 06 (2023): 427–441.

²² Susatyo and Muksin, "Constructing the Concept of Commissioner Judge in Enforcing the Exclusionary Rules Principle in Indonesia."

²³ Elmer Micu Soriano, "Implementation of Investigative Audit in the Principles of Good Corporate Governance in PT. Garuda Indonesia, Tbk (Persero)," *Jurnal Hukum Novelty (1412-6834)* 14, no. 1 (2023).

perspective of investigators, who often fall into confirmation bias and force someone to be named a suspect even though the evidence is still premature.

In this Special Case Briefing forum, the focus of the examination is no longer simply on the quantitative fulfillment of two pieces of evidence, but rather on the qualitative examination of the causal relationship between the act and the state's losses. This forum is required to examine the *mens rea* (evil intent) of the potential suspect to ensure that the alleged act is purely a criminal act of corruption, not merely an administrative error or policy discretion protected by state administrative law. Law Number 20 of 2025 concerning the Criminal Procedure Code requires that the results of the state loss audit be presented in detail in this forum.²⁴ If the forum deems that the state losses are still an estimate or that the act falls within the gray area of administrative law, the recommendation to determine a suspect must be suspended. This forum's decision is collective and binding on investigators, thus minimizing the potential for abuse of authority by individual investigators.

The documentary implication of this mechanism is the issuance of the Special Case Title Minutes, which serve as vital legal documents. Law Number 20 of 2025 concerning the Criminal Procedure Code stipulates that the BAGPK is not merely meeting minutes but a mandatory attachment to the case file that will be submitted to the Public Prosecutor. This document records the entire dynamics of the debate, legal arguments, and expert considerations that form the basis for the decision to determine a suspect. The transparency of the process recorded in this document allows for more effective judicial oversight. In the context of pretrial proceedings, judges now have clear parameters to test the validity of a suspect designation, namely by examining the existence and substance of the BAGPK. Thus, the Special Case Title mechanism serves as a last line of defense to ensure that the principle of due process of law is truly upheld before the state deprives its citizens of their civil liberties through suspect status.

Analysis of Determinant Factors and Legal Implications of Excess of Power on the Validity of Suspect Determination from the Perspective of Due Process of Law

The fulfillment of the principle of due process of law in determining a suspect in a corruption case is greatly influenced by the investigator's compliance with the limited authority stipulated in the *a quo* law. The main determining factors that guarantee the validity of this process include the availability of evidence of actual state losses and the implementation of accountable case review procedures. If these factors are ignored, the investigator's actions are classified as abuse of power, which directly violates the principle

²⁴ M Zaid et al., "Eradicating Public Official Corruption Indonesia: A Revolutionary Paradigm Focusing on State Financial Losses," *Wacana Hukum* 29, no. 2 (2023): 87–111.

of a fair trial. The legal consequences of not fulfilling these factors are the null and void status of the suspect and the invalidity of evidence obtained based on the doctrine of the fruit of the poisonous tree, which ultimately requires the state to restore the suspect's rights through rehabilitation and compensation.

When police investigators exceed the limits of their authority outlined in Law Number 20 of 2025 concerning the Criminal Procedure Code, these actions have serious legal consequences, both for the validity of the legal process itself and for the legal status of the subject being investigated. Excessive power in determining a suspect can be categorized as an abuse of power, violating the principles of legal certainty and justice. The most fundamental legal implication is that the status of the suspect is legally flawed and subject to legal revocation (*null and void*). From an administrative and criminal law perspective, any official action taken outside the scope of legitimate authority is considered non-existent and has no binding force.²⁵

The mechanism for correcting this excess of authority is facilitated through the Pretrial Trial institution. Law Number 20 of 2025 concerning the Criminal Procedure Code strengthens the Pretrial Trial's position not only as an institution examining formal aspects but also as an authority to examine limited material aspects, namely the validity of evidence acquisition. If a pretrial hearing proves that an investigator named a suspect without the support of a definitive audit of state losses or without going through the Special Case Title mechanism mandated by law, the suspect designation must be declared invalid. This decision requires the investigator to either halt the investigation or restart the process from the beginning, following proper procedures, which undoubtedly undermines the efficiency of law enforcement.

In addition to revoking suspect status, other legal implications touch on the aspect of rights restoration. Law Number 20 of 2025 concerning the Criminal Procedure Code emphasizes rehabilitation and compensation.²⁶ Suspects whose status is revoked due to negligence or arbitrary actions by investigators have the right to demand rehabilitation of their reputation and financial compensation, which must be borne by the state. This constitutes state responsibility for the misconduct of its apparatus. Furthermore, for investigators proven to have intentionally committed serious procedural violations (malicious prosecution), this law also opens up the possibility of implementing internal

²⁵ Ana Silviana and Ariza Fuadi, "Legal Policy on the Use of Heir Certificates (SKAW) for Registration of Land Rights Transfers in Indonesia," *Law Reform: Jurnal Pembaharuan Hukum* 19, no. 2 (2023): 294–320.

²⁶ Duflitama Astesa and Intan Khoirun Nisa, "Social Reintegration of Victims of Human Trafficking in Indonesia," *KnE Social Sciences* (2024): 1019–1026.

administrative sanctions and criminal sanctions for abuse of office, in order to provide a deterrent effect and maintain the integrity of the police institution.²⁷

Table 1. Comparison of Legal Implications of Determining a Suspect

Aspect	Determination According to Procedure (Law No. 20/2025)	Determination Exceeding Authority (Excess of Power)
Legal Status	Legitimate and binding (<i>Legitimate</i>)	Legally flawed and null and void by law (<i>Null and Void</i>)
Evidentiary Strength	Possesses perfect evidentiary value to be transferred to prosecution	Evidence obtained becomes invalid (<i>Fruit of the poisonous tree</i>)
Legal Remedy	Can proceed to the prosecution stage and trial of the main case	Can be challenged through Pretrial (<i>Praperadilan</i>) mechanism
Consequences for the Subject	Restrictions on rights (detention, travel bans) are legally valid	Entitled to rehabilitation of reputation and compensation

The comparative analysis in Table 1 confirms that compliance with the restrictive procedures in Law Number 20 of 2025 concerning the Criminal Procedure Code serves as an absolute determinant of the validity of a corruption suspect's legal status. The dichotomy presented shows that acts of excess of power not only imply administrative defects, but also fundamentally undermine the construction of evidence through the application of the doctrine of the fruit of the poisonous tree, where all evidence obtained from an invalid determination loses its legal value completely. This condition creates a drastic shift in the legal trajectory, changing the path that should lead to the trial of the main case into a corrective procedural dispute through the Pretrial mechanism, which is oriented towards the restoration of civil rights through rehabilitation and compensation rather than corporal punishment.²⁸

²⁷ B SI Riyadi, "The Sociology Law: Corruption and Abuse of Power in Indonesia," *International Journal of Religion* 5, no. 7 (2024): 599–613.

²⁸ Abdul Madjid and Setiawan Noedajasakti, "The Submission of Judicial Review by the Public Prosecutor Following the Decision of the Constitutional Court No 20/PUU-XXI/2023 (Indonesia): An Examination of Legal Protection for the Rights of the Convicted," *Trajectoriâ Nauki= Path of Science* 9, no. 8 (2023): 1037–1046.

CONCLUSION

The reconstruction of the authority of Police investigators under Law Number 20 of 2025 concerning the Criminal Procedure Code establishes a linear causality between strict procedural compliance and the legal validity of suspect determination in corruption crimes. This study demonstrates that the fulfillment of *due process of law* is no longer an abstract ideal but is operationally dependent on two critical variables: the transition from subjective discretion to scientific evidence through definitive state loss audits, and the mandatory implementation of "Special Case Exposure" involving external experts as a substantive test of objectivity. Consequently, the integrity of these limitative boundaries functions as the absolute determinant; any deviation or *excess of power* by investigators does not merely result in administrative maladministration, but fundamentally nullifies the legal status of the suspect and renders the evidence invalid (*fruit of the poisonous tree*), thereby affirming that procedural justice is the prerequisite for substantive justice in the eradication of corruption.

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