



Ratio Decidendi in Pretrial Decision Number 5/Pid.Pra/PN Mataram: Cancellation of Suspect Determination Due to Invalid Police Report

I Wayan Sukardiawan¹, Musmuliadin², Hajairin³

^{1,2,3,4} Universitas Muhammadiyah Bima, Indonesia



Corresponding Author*

Abstract

This study is motivated by the limited academic analysis that systematically reconstructs judicial ratio decisions in pretrial decisions, particularly in positioning the validity of police reports as the legal basis of criminal investigation. This research aims to examine the construction of ratio decidendi in Pretrial Decision Number 5/Pid.Pra/2025/PN Mtr and its implications for the principle of due process of law and law enforcement practices. The study employs a normative juridical method using statutory, case, and conceptual approaches, analyzed qualitatively through legal reasoning. The findings reveal that the judge constructs the ratio decidendi through a systemic approach using the chain of illegality doctrine, where the invalidity of the police report as an initial defect leads to the nullification of the entire investigation process, including the investigation order, notification letter, and suspect designation. The decision reinforces the principle of due process of law by treating procedural compliance as a substantive element of justice, while also encouraging higher standards of caution among law enforcement officials, despite generating tension between procedural legal certainty and the effectiveness of law enforcement.

Keywords: Ratio Decidendi, Pretrial, Police Report, Due Process of Law, Criminal Investigation

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INTRODUCTION

The Indonesian criminal justice system is built on the principle of a state based on the rule of law, which places the law as the basis for the legitimacy of every state action, including in the process of investigation and determining suspects.(Hamaminata, 2023). Within this framework, the existence of pre-trial proceedings as regulated in the Criminal Procedure Code (KUHP) functions as a control mechanism for the actions of law enforcement officers.(Sarmiento & Yu, n.d.). Pretrial proceedings are not only a means of testing the legality of coercive actions, but also an instrument for protecting human rights in the criminal justice process.(Pujiyono et al., 2022).

Legal developments show that the scope of pre-trial proceedings has expanded significantly, especially after the Constitutional Court's decision included the determination of suspects as an object of pre-trial proceedings.(Hamaminata, 2023)This marks a paradigm shift from a formalistic approach to a substantive approach in assessing the legality of investigators' actions. In practice, pretrial proceedings now examine not only administrative aspects but also whether the suspect-determination process complies with the principle of due process of law.(Moonti et al., 2025).

However, in law enforcement practice, problems often arise related to suspect determinations that are not fully based on legal procedures. One crucial issue is the validity of police reports as the initial basis for investigations.(Sikumbang & Sara, 2025)A

police report should be the entry point into the criminal justice system, meeting certain formal and material requirements. However, in many cases, police reports become a weak point, impairing the entire subsequent legal process.(Prabowo & Sulaiman, 2025).

Several studies have shown that pre-trial proceedings act as a corrective instrument for procedural errors in determining suspects. Research conducted by(Rorie & Kaligis, 2024), emphasized that pretrial proceedings not only examine formal aspects, but also assess the suitability of the suspect determination process to criminal procedural law standards. Meanwhile, research(Endika et al., 2025)shows that the cancellation of suspect status is often related to procedural violations that impact the protection of human rights.

Other research also highlights that the main weakness in the practice of determining suspects lies in the failure to fulfill the minimum requirements for evidence and the inconsistency in the application of the law by law enforcement officers.(Martitah et al., 2024)In many cases, the cancellation of a suspect's case is due to the failure to meet the standard of two pieces of evidence as stipulated in the Criminal Procedure Code and the Constitutional Court's decision.(Darmawan & Octarina, 2025). On the other hand,(Moonti et al., 2025)shows that the effectiveness of pre-trial proceedings is still limited due to inconsistent decisions and weak access to investigative documents.

In the international context, studies on pretrial review and procedural safeguards also show that the legality of law enforcement actions depends heavily on compliance with legitimate procedures.(Hermanto & Santiago, 2021)Pre-trial is an instrument to maintain a balance between state authority and individual rights in the criminal justice system.(Surya Pandu Baskara & Alfitra, 2019). Other studies in the international literature also highlight the importance of procedural justice in determining the legitimacy of legal action, where an illegitimate process will undermine the legitimacy of the resulting outcome.

Furthermore, international studies on derivative illegality show that legal flaws in the early stages of a criminal process can lead to the invalidation of the entire subsequent process. This approach emphasizes that the criminal justice system must be viewed as an interconnected whole, so that violations at one stage cannot be separated from those at another.(Wahid, 2024)This perspective is in line with the concept of systemic justice that has developed in modern legal studies.

However, previous studies have tended to focus on general aspects of suspect determination, such as the sufficiency of evidence, investigator authority, and human rights protection. Few studies have specifically examined the validity of police reports as a legal trigger in constructing a pretrial judge's ratio decidendi.(Mashdurohatun & Wahyuningsih, 2024). In other words, there is a lack of studies that link defects in the early stages of the legal process to the cancellation of the entire process through a ratio decidendi analysis approach.

This research gap becomes even more relevant when linked to Pretrial Decision No. 5/Pid.Pra/2025/PN Mataram, which explicitly declared the police report invalid and used it as a basis for annulling the entire investigation process, including the determination of a suspect. This decision demonstrates a significant shift in judicial practice, where judges assess not only the final outcome but also examine the validity of the process from its earliest stages.

The urgency of this research lies in the need to understand how judges construct ratio decidendi in the context of revoking a suspect's conviction based on flawed police reports. Analysis of this decision is crucial not only for the development of criminal procedural law but also for providing guidance for law enforcement officials in exercising their authority legally and accountably.

Based on this description, this study aims to analyze in-depth the ratio decidendi in Pretrial Decision Number 5/Pid.Pra/2025/PN Mataram, specifically regarding the annulment of a suspect's determination due to an invalid police report. This study also

seeks to assess the implications of this decision for law enforcement practices in Indonesia.

The novelty of this research lies in its analytical approach, which places the police report as the primary basis for constructing the *ratio decidendi*, and examines the causal relationship between procedural flaws at the initial stage and the cancellation of the entire investigation process using the chain of illegality approach. Thus, this research not only fills a gap in the criminal procedure law literature but also provides theoretical and practical contributions to understanding the dynamics of pretrial proceedings in Indonesia.

METHOD

This research is a normative juridical study that focuses on the analysis of positive legal norms and their application in court decisions. The approaches used include the statute approach, the case approach, and the conceptual approach. The statutory approach is used to examine the provisions of the Criminal Procedure Code (KUHP) and related regulations governing pretrial proceedings, suspect determination, and investigation procedures. The case approach is carried out by in-depth analyzing Pretrial Decision Number 5/Pid.Pra/2025/PN Mataram as the main object of the research, specifically in identifying and reconstructing the judge's *ratio decidendi*. Meanwhile, the conceptual approach is used to understand legal concepts such as *ratio decidendi*, due process of law, and procedural legality as an analytical framework in assessing the judge's considerations.

The legal sources in this study consist of primary, secondary, and tertiary legal materials. Primary legal materials include laws and court decisions, particularly pretrial decisions, which are the object of the study. Secondary legal materials consist of scientific literature such as books, journals, and previous research results relevant to the research topic, while tertiary legal materials include legal dictionaries and encyclopedias that support conceptual understanding. The legal material collection technique is carried out through library research, which is then analyzed qualitatively using legal reasoning methods. This analysis is carried out systematically by connecting legal norms, doctrines, and facts in decisions to uncover the construction of the *ratio decidendi* and assess its legal implications for law enforcement practices.

RESULTS AND DISCUSSION

Theoretical Framework of Ratio Decidendi in Pretrial Decisions

Ratio decidendi is a fundamental concept in the theory of judicial decisions which refers to the main legal reasons which form the basis for decision making.(Akbar et al., 2024)In the modern legal tradition, *ratio decidendi* is understood as the core argument that connects legal norms to the concrete facts of a case. This concept differs from *obiter dicta*, which is merely an additional statement and is not legally binding. In this context, *ratio decidendi* serves as normative justification for a judge's decision.(Feriyana & Mashdurohatun, 2020).

From the perspective of legal theory, the *ratio decidendi* not only functions to explain the reasons for a decision, but also acts as an instrument for forming law (judge-made law).(Renaissance, 2025)Edin explained that the judge's decision contains an argumentative dimension that forms the standard of legal rationality, especially when the judge is faced with a void or unclear norm.(Edin et al., 2025)In this context, the *ratio decidendi* becomes a means for judges to interpret and develop the law progressively.

In the Indonesian legal system, which is rooted in the civil law tradition, the role of the *ratio decidendi* is often seen as more limited than in the common law system.(Swadaya & Jati, 2024)However, developments in judicial practice show that the judge's considerations have an increasingly significant role in shaping the direction of legal interpretation.(Tumbur et al., 2022)This is evident in the increasing use of court decisions

as references in similar cases, particularly in the context of criminal procedure. In the context of pretrial proceedings, the ratio decidendi has different characteristics compared to criminal decisions in general. The object of review in pretrial proceedings is not the defendant's fault, but rather the legality of the actions of law enforcement officers. This positions the pretrial judge as a procedural reviewer, so that the ratio decidendi developed tends to focus on compliance with procedural norms and principles of procedural justice.(M. A. Lubis, 2025).

The principle of due process of law is the main basis for establishing the ratio decidendi in pretrial decisions.(Son, 2022)This principle emphasizes that every state action must be carried out in accordance with legitimate procedures and respect individual rights. In international literature, due process is seen as an essential element in maintaining the legitimacy of the criminal justice system, as unfair processes will undermine public confidence in the law.(Bawono, 2020).

Legal developments in Indonesia show that the scope of pretrial proceedings has expanded significantly, particularly following the Constitutional Court's ruling that included suspect determination as an object of pretrial proceedings. This expansion strengthens the role of the ratio decidendi as a means of controlling investigators' actions, as judges assess not only the formal aspects but also the substance of the suspect determination process.(Agus et al., 2025).

In the analysis of pretrial decisions, the ratio decidendi is often constructed through an assessment of the relationship between the stages of the criminal process. Each stage, from the police report to the determination of a suspect, is viewed as part of an interconnected system. A flaw in any one stage can affect the validity of the entire process. This approach is known in the literature as derivative illegality or the fruit of the poisonous tree doctrine.

This approach demonstrates that the ratio decidendi in pretrial proceedings is not merely linear but also systemic. Judges do not assess each act in isolation, but rather examine the interrelationships between them within the framework of the entire legal process. This perspective reinforces the understanding that criminal procedure is an integrated system, whereby procedural violations at one stage can undermine the legitimacy of subsequent stages. On the other hand, there is debate about the extent to which procedural violations should result in the annulment of legal actions. Some literature argues that an overly strict approach to procedure can hinder the effectiveness of law enforcement. However, others emphasize that adherence to procedure is essential to ensuring justice and preventing abuse of power.

Within this framework, the ratio decidendi in pretrial decisions can be understood as a reflection of the judge's efforts to balance legal certainty, justice, and expediency. The legal considerations developed not only aim to resolve specific disputes but also to provide direction for future law enforcement practices. This demonstrates that the ratio decidendi has both normative and practical dimensions within the criminal justice system.

Construction of the Ratio Decidendi in Pretrial Decision Number 5/Pid.Pra/2025/PN Mtr

Pretrial Decision Number 5/Pid.Pra/2025/PN Mtr is a decision handed down by the Mataram District Court in a pretrial case filed by two applicants against the Respondent, namely the Mataram City Police. This application essentially tests the validity of the investigator's actions in determining the applicants as suspects in the alleged crime of forgery as regulated in Article 263 and Article 266 of the Criminal Code. The objects of dispute in this case include the determination of suspects, the validity of the Investigation Order (Sprindik), the delivery of the Notice of Commencement of Investigation (SPDP), and the validity of the police report as the basis for starting the legal process.

The verdict indicates that the judge granted the applicants' petition in its entirety. The judge declared that the suspect determination against the applicants was invalid and

not legally binding, and found procedural flaws in the investigation process, including the failure to submit the SPDP within the specified timeframe and the invalidity of the Sprindik. Furthermore, the judge also declared that the police report as the initial basis for the criminal process was invalid. Based on these findings, the judge ordered the termination of the investigation and the restoration of the applicants' rights. This decision places procedural aspects as a determining factor in assessing the legality of investigators' actions.

In kUsing the ratio decidendi construction, this decision is constructed through a systemic approach, in which the judge assesses each stage of the investigation as part of an interrelated series. The legal argument is not focused on a single action, but rather on the causal relationship between the investigator's various actions. This pattern demonstrates that the validity of an action cannot be separated from the validity of the previous stages.

The initial stage of construction begins with the recognition of pretrial authority through the rejection of the Respondent's exception. This step demonstrates that the judge accepts the disputed object as part of the pretrial scope, including the determination of suspects and investigative actions. This recognition serves as the basis for the judge to continue analyzing the subject matter of the case and substantively assessing the legality of the law enforcement officers' actions.(Ely Kusumastuti, 2018).

Furthermore, the judge positions the determination of a suspect as the result of a process, not as a standalone action. Within this framework, the validity of the determination of a suspect depends on the fulfillment of legitimate procedures in the previous stage. If flaws are discovered in the investigation process, the suspect status resulting from that process loses its legal legitimacy.(Mashuri et al., 2025).

The analysis then focused on procedural violations related to the failure to provide SPDPs to the applicants. The judge considered that the obligation to provide SPDPs plays a crucial role in ensuring transparency and accountability in the investigation process. Failure to comply with this obligation is seen as a violation of the principle of procedural fairness, thus impacting the validity of the process as a whole.(Kurdi et al., 2026)Therefore, the judge evaluated the validity of the Sprindik as a formal legal basis for investigative actions. If the Sprindik is declared invalid, all actions taken based on it are rendered legally void. This assessment demonstrates the judge's emphasis on the importance of a valid legal basis for every action by law enforcement officers.

The most crucial part of constructing the ratio decidendi lies in the assessment of the police report. Judges consider the police report as the initial foundation that determines the validity of the entire criminal process. The invalidity of the police report renders the entire subsequent series of actions void of legal basis.(A. H. Lubis & Purba, 2025)In this context, the judge constructed an argument that showed a causal relationship between the defects at the initial stage and the cancellation of the entire process.

All these considerations form a chain of illegality pattern, where a legal flaw at one stage results in a chain of flaws at the next stage. (Syahrin et al., 2025)Judges do not isolate each action individually, but rather view it as part of an integrated system. This approach demonstrates that the legality of the process is a primary factor in determining the validity of the outcome.

Ultimately, the construction of the ratio decidendi in this decision leads to the conclusion that violations of legal procedures are intolerable, especially when they occur early in the criminal process. This decision affirms that the legitimacy of state action in criminal law is determined not only by the purpose of law enforcement, but also by adherence to legitimate and fair procedures.

The Validity of Police Reports as a Legal Basis for Investigations

In the context of Pretrial Decision Number 5/Pid.Pra/2025/PN Mtr, the validity of the police report occupies a central position in the judge's legal reasoning. The police report is not treated as an ordinary administrative document, but rather as the initial

foundation that determines the validity of the entire investigative process. The judge explicitly considered that the invalidity of the police report directly impacts the legitimacy of the investigator's actions in determining the suspect.

The judge's ruling demonstrates that police reports are understood as a legal trigger that activates investigators' authority. When a police report is declared invalid, investigators no longer have a legal basis to take further action (Lewulis, 2026). This decision demonstrates the cancellation of not only the suspect's determination but also the Sprindik (Investigation Order) and other investigative actions. This demonstrates a strong causal relationship between the police report and all stages of the criminal process.

Furthermore, the judge in this ruling developed an argument that places the police report as part of an integrated criminal procedural system. The invalidity of the police report is not viewed as a stand-alone flaw, but rather as an initial flaw that permeates the entire subsequent process (Kuru, 2025). This perspective reinforces the view that each stage of the criminal process is interdependent, so that violations in the initial stages have systemic impacts.

This construction reflects the application of the chain of illegality doctrine, where a legal flaw in the initial stage results in a chain of flaws in subsequent stages. In the Mataram District Court's decision, this pattern is clearly visible through the judge's sequence of considerations: the police report was declared invalid, followed by the invalidity of the Sprindik (Investigation Letter), violations in the submission of the SPDP (Investigation Order), and finally, the annulment of the suspect determination (Giles et al., 2022). This sequence demonstrates the judge's use of a causal approach in assessing the legality of the investigator's actions.

Furthermore, this decision demonstrates that the judge failed to distinguish between formal and material aspects when assessing the validity of a police report. The invalidity of a police report is understood as a failure to meet essential procedural standards, which results in the loss of legal legitimacy for all subsequent actions. (Ridzqi & Arifin, 2024). Within this framework, procedures are no longer seen as formalities, but rather as a substantive part of justice.

The judge's approach in this ruling is also closely related to the principle of due process of law. By using the police report as the basis for legality, the judge emphasized that every state action must begin with a legitimate procedure. (Suryana, 2025) When the initial procedure is flawed, further action cannot be justified, even if there may be substantial allegations of criminal conduct. This demonstrates that procedural fairness is a priority in the judge's assessment. Furthermore, this approach also has significant implications for law enforcement practice. The insistence that police reports must be strictly valid encourages law enforcement officials to exercise greater caution in the early stages of the criminal process. (Hangrengga, et al., 2025) Any negligence in preparing or receiving a police report has the potential to invalidate the entire legal process that has been carried out.

However, the approach that places the police report as the absolute basis for legality also opens up room for debate. It is possible that not all flaws in a police report should result in the dismissal of the entire investigation. In this context, clearer parameters are needed to distinguish between substantive and administrative flaws.

Despite the debate, Pretrial Decision No. 5/Pid.Pra/2025/PN Mtr points to an important development in judicial practice in Indonesia. Police reports are no longer viewed as a neutral initial stage, but as a key element determining the legitimacy of the entire legal process. This perspective strengthens the role of pretrial as a check on the actions of law enforcement officials, while also emphasizing that justice in criminal law must begin with a legitimate process from the earliest stages.

Implications of the Decision on the Principle of Due Process of Law

The principle of due process of law is the main foundation in the criminal justice system which emphasizes that every state action must be carried out based on legal, fair and transparent procedures.(Ahmad Syaafi, 2023)This principle is not only related to the protection of individual rights, but also functions as a mechanism for limiting state power.(Pujiyono et al., 2022). In the context of Pretrial Decision Number 5/Pid.Pra/2025/PN Mtr, this principle becomes a normative framework that implicitly underlies all of the judge's legal considerations in assessing the legality of investigators' actions.

The ruling demonstrates that judges place adherence to procedures as a primary element in determining the validity of law enforcement actions. The determination of a suspect is assessed not only from the substance of the alleged crime, but also from the process that gave rise to it (Rizal et al., 2026). This perspective aligns with the view that justice is determined not only by the final outcome, but also by the process undertaken to achieve that outcome.(Moh. Riziq & Amri, 2025).

The main implication of this ruling is seen in the affirmation that procedural violations, such as the invalidity of the police report and the failure to submit a SPDP, constitute violations of the principle of due process of law (Bhuller et al., 2025). The judge did not consider these violations as administrative errors that could be ignored, but rather as substantive violations that directly impact the legitimacy of the investigative action.(Saputra et al., 2023)This shows that procedures have intrinsic value in ensuring justice.

Furthermore, this ruling emphasizes that every stage of the criminal process must meet strict procedural standards. The invalidity of the police report as the initial basis for the investigation demonstrates that the principle of due process applies from the earliest stages of the criminal justice system. Protection of individual rights must begin at the investigation stage, not just at the trial.(Kertabudi, 2025).

Furthermore, another important implication is the strengthening of the pretrial process as a control mechanism for the actions of law enforcement officials. In the Mataram District Court's decision, the judge not only examined the formality of the action but also assessed the procedure's compliance with the principles of justice. This demonstrates that pretrial proceedings serve as an instrument to ensure that state authority is exercised accountably and without arbitrariness (Balyaminu, 2025).

This decision also demonstrates that the principle of due process of law has a systemic dimension in criminal procedure. A violation at one stage, such as a police report, impacts the validity of the entire subsequent process.(Azmi, 2022)This approach reflects the understanding that the criminal justice system is an interconnected system, making the integrity of each stage crucial. Legal literature emphasizes that this systemic approach is necessary to maintain the consistency and legitimacy of the legal process.(Marzuki, n.d.).

On the other hand, the implications of this ruling also have practical consequences for law enforcement officials. The affirmation that any procedural violation can result in the cancellation of the entire process encourages investigators to be more cautious in exercising their authority. This has the potential to improve the quality of the investigative process while strengthening the protection of suspects' rights.

However, this approach, which places a heavy emphasis on procedure, has also generated debate in the legal literature. Some argue that strict application of due process can hinder the effectiveness of law enforcement, particularly in cases requiring swift action.(Asnawi, et al., 2025). Therefore, it is important to strike a balance between procedural compliance and efficient law enforcement.

In this context, Pretrial Decision Number 5/Pid.Pra/2025/PN Mtr demonstrates a development that prioritizes due process of law in the Indonesian criminal justice system. The judge emphasized that the legitimacy of state action is determined not only by the objective of law enforcement but also by adherence to legal procedures. This approach

strengthens the pretrial process's position as a guardian of the principle of procedural justice and provides direction for more accountable and equitable law enforcement practices.

Critical Analysis of Ratio Decidendi

Ratio decidendi Pretrial Decision Number 5/Pid.Pra/2025/PN Mtr demonstrates that the judge constructed a strong legal argument in emphasizing the importance of adherence to procedures as the basis for the legality of investigative actions. The approach used positions procedures as a substantive element of justice, not merely an administrative formality.(Farhani et al., 2023)This strengthens the position of pretrial proceedings as a control mechanism against potential abuse of authority by law enforcement officials.

The primary strength of the ratio decidendi in this decision lies in the consistent causal logic established by the judge (Custers & Andreas, 2024). The invalidity of the police report is positioned as an initial flaw that impacts all subsequent stages, including the Sprindik (Investigation Letter), the SPDP (Inspection Letter), and the determination of the suspect (Fine & Håkansson, 2026). This pattern demonstrates a systemic approach to assessing the legality of investigators' actions. Criminal law literature emphasizes that such an approach is crucial for maintaining the integrity of the legal process and preventing the legitimization of illegitimate actions.(Manurung, et al., 2025).

Furthermore, this ruling reinforces the principle of due process of law by emphasizing that every stage of the criminal process must meet strict procedural standards. Judges will not tolerate procedural violations, even at early stages such as the police report. This approach aligns with the view that procedural fairness is a prerequisite for substantive justice.(Valentino, 2025)This perspective makes an important contribution to strengthening human rights protection in the criminal justice system.

However, there are several aspects of the ratio decidendi construction that can be criticized. One major issue is the strong tendency toward formalism in assessing procedural violations. Judges appear to assume that any flaw in the initial stages automatically invalidates the entire investigation process. This approach potentially ignores the distinction between substantive and administrative flaws.

Another criticism relates to the lack of exploration of the material aspects of the case. The judge's strong focus on procedure results in relatively limited analysis of the substance of the alleged crime. In some views, an overly procedural approach can hinder the primary goal of law enforcement, which is to uncover the material truth. A balance between procedure and substance is a crucial element of the modern criminal justice system.(Yanto et al., 2024).

Furthermore, the practical implications of this ruling also need to be considered. The assertion that the invalidity of a police report can invalidate the entire investigation process has the potential to create excessive caution among investigators (Mahmoudpour & Shirazi, 2025). This can slow down the law enforcement process, especially in cases requiring swift action. Research shows that the effectiveness of law enforcement often depends on the balance between procedural compliance and operational efficiency.(Rochaeti et al., 2023).

On the other hand, the judge's approach in this ruling can also be seen as a progressive step in strengthening the accountability of law enforcement officials. By placing the police report as the foundation of legality (Papagianneas & Junius, 2023), the judge is pushing for higher standards in the early stages of the criminal process. This has the potential to improve the quality of investigations and prevent practices that are inconsistent with legal principles.(Syamsuddin Muchtar, et al., 2024).

Overall, the ratio decidendi in Pretrial Decision Number 5/Pid.Pra/2025/PN Mtr reflects the judge's efforts to consistently uphold the principles of legality and due process of law. Despite potential weaknesses in the form of a tendency towards formalism, this

approach still makes an important contribution to strengthening the protection of individual rights and maintaining the integrity of the criminal justice system. This critical analysis demonstrates that the decision finds itself in a tension between legal certainty and effective law enforcement, an inherent dynamic in modern judicial practice.

Implications for Law Enforcement Practices

Pretrial Decision Number 5/Pid.Pra/2025/PN Mtr has significant implications for law enforcement practices, particularly in the early stages of criminal proceedings. This ruling affirms that the validity of every investigator's action must be based on a valid basis, namely a police report that meets formal and material requirements. This affirmation changes the perspective on the early stages of the criminal process, which were previously often treated as administrative, to one with decisive legal consequences.

The first implication is seen in the increased standards of care in the receipt and preparation of police reports. Law enforcement officers are required to ensure that reports received meet the required criteria before being used as the basis for an investigation (Pascal, 2026). Research shows that weaknesses in the initial stages are often the main cause of legal proceedings being dismissed in pretrial proceedings. (Sukardi & Purnama, 2022).

The second implication relates to the issuance of a Sprindik. This ruling demonstrates that a Sprindik is inseparable from the validity of a police report. Investigators must ensure that the basis for issuing a Sprindik is legally valid, as any flaws at this stage can lead to the cancellation of the entire investigation (Bower et al., 2025). This reinforces the principle that every action in a criminal proceeding must have a valid legal basis.

Furthermore, the obligation to submit SPDPs has received greater attention. This ruling confirms that delays or omissions in submitting SPDPs are not merely administrative violations but can impact the validity of legal proceedings. Studies show that compliance with SPDP obligations is a crucial component of transparency and accountability in investigations. (Zahlan & Fakrulloh, 2024).

The next implication relates to changes in investigators' work patterns, which must be more systematic and documented. Each stage of the investigation process must be legally accountable, both procedurally and substantively (Shih, 2024). This approach encourages professionalism in law enforcement while reducing the potential for abuse of authority in criminal proceedings.

On the other hand, this ruling also strengthens the position of pretrial proceedings as an effective oversight mechanism for law enforcement actions (Rimer et al., 2025). Investigators can no longer ignore the procedure, assuming it will not be challenged. Research shows that strengthening the pretrial function contributes to increased accountability in the criminal justice system. (Nita et al., 2021).

However, these implications also pose challenges for law enforcement practice. Increased procedural standards can slow down the investigation process, especially in cases requiring a rapid response. In the legal literature, this condition is often associated with the tension between the effectiveness of law enforcement and adherence to procedures. (Rahayuningsih et al., 2023).

Overall, Pretrial Decision No. 5/Pid.Pra/2025/PN Mtr encourages a transformation in law enforcement practices toward a more accountable, transparent, and due process-based approach. This decision not only impacts specific cases but also provides guidance for law enforcement officials in exercising their authority more carefully and in accordance with applicable legal provisions.

DISCUSSION SECTION:

Main Finding

The main finding of this study indicates that the ratio decidendi in Pretrial Decision Number 5/Pid.Pra/2025/PN Mtr is constructed through a systemic approach that places the validity of the police report as the primary foundation for the legality of the entire investigative process. The judge does not view suspect determination as a stand-alone action, but rather as the result of a series of procedures that must be valid from the earliest stages. The invalidity of the police report in the decision is positioned as a root defect that has a chain effect on the invalidity of the Sprindik, violations in the submission of the SPDP, and ultimately the cancellation of the suspect determination. This pattern reflects the application of the chain of illegality doctrine, where a flaw in one stage causes the entire process to lose legal legitimacy.

Other findings indicate that this ruling strengthens the application of the principle of due process of law in pretrial practice in Indonesia by placing procedure as a substantive element of justice. The judge emphasized that every action by law enforcement officers must be based on legal, transparent, and accountable procedures, with zero tolerance for violations even in the early stages of the criminal process. The implications of this approach not only impact the annulment of concrete actions in cases but also encourage increased standards of prudence and professionalism of law enforcement officers. At the same time, these findings reveal a tension between procedural-based legal certainty and the effectiveness of law enforcement, which is a crucial issue in the future development of criminal procedural law.

Novelty

This research's academic position rests on an analytical approach that places the police report as the primary basis for constructing the pretrial judge's ratio decidendi. Previously, studies on pretrial proceedings tended to focus on the determination of the suspect, the sufficiency of evidence, and the investigator's authority, without thoroughly elaborating on the police report's role as the starting point for determining the legitimacy of the entire criminal process. This research demonstrates that the police report is not merely an administrative document, but rather a normative element that has the power to determine the legitimacy of the entire investigative process.

Furthermore, the novelty of this research lies in the use of the chain of illegality approach in reconstructing the judge's ratio decidendi. This research reveals that the judge in Pretrial Decision Number 5/Pid.Pra/2025/PN Mtr constructed legal arguments systematically and causally, where flaws in the initial stage (the police report) impacted the invalidity of subsequent stages, such as the Sprindik, SPDP, and suspect determination. This approach enriches the treasury of criminal procedural law analysis in Indonesia by presenting a more integrated and non-partial perspective in understanding the legality of criminal proceedings.

Contributions, Limitations, and Recommendations

This research's contribution lies in strengthening the theoretical and practical dimensions of pretrial studies. Theoretically, this research provides a conceptual elaboration on the relationship between ratio decidendi, due process of law, and procedural legality in the criminal justice system. Practically, the findings of this study provide guidance for law enforcement officials to position the initial stages of the criminal process, particularly the police report, as a part that must be fulfilled carefully and legally. This research also contributes to strengthening the function of pretrial as a control mechanism against state actions.

However, the shortcomings of this study lie in its limited scope, focusing on only one pretrial decision, thus limiting the generalizability of the findings. Furthermore, the analysis focused more on normative aspects and failed to fully incorporate empirical approaches related to investigative practices in the field. Another limitation is the lack of a comprehensive comparison with other pretrial decisions addressing similar issues, thus

hindering a comprehensive understanding of the analyzed decision's position within the national jurisprudence landscape.

Recommendations for further research are directed at developing more comprehensive studies by combining normative and empirical approaches. Further research could expand the scope of study by comparing several pretrial decisions related to the validity of police reports to identify patterns and consistency in judges' ratio decidendi. Furthermore, it is important to further examine the boundaries between substantive and administrative procedural defects to prevent excessive formalism in law enforcement practices. An interdisciplinary approach that combines aspects of law, criminology, and public policy could also provide a more comprehensive perspective in understanding the dynamics of pretrial proceedings in Indonesia.

CONCLUSION

The conclusion of this study shows that the ratio decidendi in Pretrial Decision Number 5/Pid.Pra/2025/PN Mtr is constructed through a systemic approach that places the validity of the police report as the primary foundation in determining the legality of the entire investigation process. The judge developed a causal argument showing that defects in the initial stage, particularly the police report, had a chain effect that resulted in the invalidity of the Sprindik, violations of the SPDP procedure, and even the cancellation of the suspect's determination. This approach strengthens the application of the principle of due process of law by emphasizing that compliance with procedures is a substantive element of criminal justice. Furthermore, this decision also has important implications for law enforcement practices, namely increasing the standard of prudence of law enforcement officers in exercising their authority, while also opening up space for debate regarding the balance between procedural-based legal certainty and the effectiveness of law enforcement in the Indonesian criminal justice system.

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