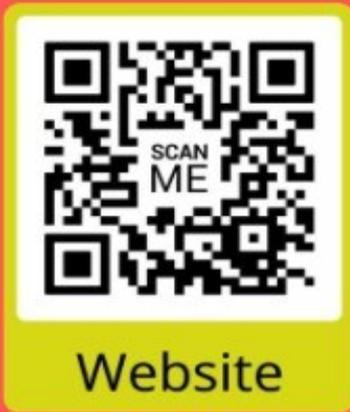


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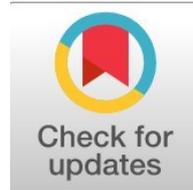
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Application of the *Unus Testis Nullus Testis* Principle in Corruption Crime Cases: Study of Decision No. 2677/PAN.PN.WII.UI/HK.2.2/VI/2025

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Abstract

General Background Criminal procedure law in Indonesia mandates that judicial decisions be grounded on lawful evidence and the principle of minimum proof to uphold the rule of law. **Specific Background** In corruption crime adjudication, witness testimony constitutes valid evidence under the Criminal Procedure Code (KUHAP), yet it cannot stand alone due to the principle of *unus testis nullus testis*, which requires at least two lawful pieces of evidence to establish guilt. **Knowledge Gap** Limited doctrinal analysis has examined how this evidentiary principle is applied in concrete corruption cases involving multiple defendants and contested indictments by the Corruption Eradication Commission (KPK). **Aims** This study analyzes the application of the *unus testis nullus testis* principle in Decision No. 2677/PAN.PN.WII.UI/HK.2.2/VI/2025 and evaluates the evidentiary basis of the KPK Public Prosecutor's indictment against Defendant IV FCR. **Results** Using normative juridical research with a statute approach, the study finds that only one witness alleged the transfer of IDR 30,000,000 to Defendant IV FCR, while other testimonies and documentary statements contradicted this claim. The indictment also demonstrated inconsistencies in legal reasoning and classification of evidence. Consequently, the evidentiary threshold under Articles 183 and 185 KUHAP was not fulfilled, rendering the charge unproven. **Novelty** This article provides a structured doctrinal examination of evidentiary insufficiency in a multi-defendant corruption trial through systematic interpretation of statutory provisions. **Implications** The findings reaffirm the centrality of corroborated evidence in corruption prosecutions and underscore the necessity of strict adherence to evidentiary standards to ensure legal certainty and judicial fairness.

Highlights:

- A single uncorroborated testimony was insufficient to establish criminal liability.
- Contradictions among witness statements weakened the prosecutorial argument.
- The indictment failed to satisfy the statutory minimum proof requirement, leading to acquittal.

Keywords: Indictment, Corruption, Public Prosecutor, Pleadings, Defendant

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Introduction

Article 1, paragraph (3) of the 1945 Constitution states that the Unitary State of the Republic of Indonesia is a state based on law. All matters related to the regulation of the state must be based on law, not by power, thus requiring institutions and law enforcement apparatus to ensure a well-organized and orderly government [1].

In criminal cases, the process of proof is a key element in the criminal justice system, serving as the fundamental basis for achieving justice [2]. The success of this process not only affects the fate of the defendant but also impacts the restoration of victims' rights and the fulfillment of justice in society [3]. One form of valid evidence in a trial is a witness [4].

Regarding a witness whose testimony is corroborated in court without support from other witnesses, the principle of *Unus Testis Nullus Testis* applies [5]. A witness statement alone is not allowed under the Criminal Procedure Code (KUHAP), as it violates the objectives of criminal procedure law, which seeks to uncover material or genuine truth [6]. A single witness is not considered to have strong evidentiary power, and is therefore referred to as a non-witness. Therefore, the minimum proof required to establish the defendant's guilt for a criminal sentence must involve at least two valid pieces of evidence [7]. One piece of evidence alone is not sufficient according to the law to prove the defendant's guilt.

One of the cases commonly found in Indonesia involves corruption crimes, also known as a *quo* cases. The a *quo* case is a corruption case (*Tipikor*) involving four defendants [8].

Corruption cases with public prosecutors from the Corruption Eradication Commission (KPK) are not unfamiliar in this republic. However, in the a *quo* case, there is a corruption case with public prosecutors from the KPK, where the defendants are accused of receiving a sum of IDR 30,000,000.00 (thirty million rupiahs) or a promise. As mentioned earlier, the defendants in the a *quo* case number four, but it is peculiar that Defendant IV, FCR, who did not actually receive IDR 30,000,000.00 (thirty million rupiahs) or a promise, had to be sacrificed in order for the total value of the case handled by the KPK to amount to IDR 1,000,000,000.00 (one billion rupiahs). This led to an alternative charge that essentially involves bribery or gratification, combined with additional penalties related to accomplice offenses and ongoing crimes [9].

The defendant undergoing a criminal trial will have the opportunity to present a defense statement [10]. In some cases or criminal cases that attract widespread public attention, the defense statement can become an opportunity for the defendant to gain sympathy from the public [11]. In legal terms, this form of defense statement is referred to as "*pledoia*. [12]"

Pledoia is a stage in the defense process where the defendant presents their objections to the charges brought by the public prosecutor [13]. The law regulates *pledoi* in the court proceedings, specifically in Article 182, paragraph 1 of the Criminal Procedure Code (KUHAP). Although the discussion is not exhaustive, it is clear enough to be understood. The *pledoi* is submitted in writing and read aloud during the trial [14]. The purpose of *pledoi* is to request an acquittal or release from all legal charges. However, in practice, misunderstandings can still occur during the *pledoi* process, such as when the content of the *pledoi* only requests a reduction in the sentence, or when *pledoi* is delivered orally in court [15].

Method

The type of research used is juridical-normative research, which is a type of research that examines secondary data sources as the basis for investigation by reviewing relevant regulations related to the issues being discussed [16]. The research method used is the statute approach, which involves studying laws that are related to and connected with the legal issue being addressed. In other words, the statute approach emphasizes legislation as the primary reference in conducting research [17].

According to Soekanto, [18] the legal sources used in this research consist of: (1) primary legal materials that are binding and authoritative, including Law Number 8 of 1981 concerning the Indonesian Criminal Procedure Code; (2) secondary legal materials, which provide explanations regarding primary legal materials or all publications about law that are not official documents, such as scholarly works, research results, books, magazines, online articles, papers, newspapers, and e-books, particularly on the topics of Criminal Procedure Law, Advocates, and Legal Argumentation. Data collection techniques are conducted through library research, referring to primary and secondary legal materials. The data analysis method uses interpretive-systematic legal interpretation, which analyzes qualitative data (data consisting of a series of words) [19].

Result and Discussion

A. Public Prosecutor's Statement

According to Article 185, paragraph (2) of the Criminal Procedure Code (KUHAP), "The testimony of a single witness is not sufficient to prove that the defendant is guilty of the alleged offense." This is known in legal terminology as *Unus Testis Nullus Testis* (one witness is not a witness). Based on the above, we strongly disagree with the Public Prosecutor's indictment (*Requisitoir*) dated June 10, 2025, which essentially states that "Defendant I R, Defendant II YC, Defendant III AND, and Defendant IV FCR have been proven beyond a reasonable doubt under the law to be guilty of committing corruption offenses together and continuously as stipulated in Article 12 letter b in conjunction with Article 18 of Law No. 31 of 1999 on the Eradication of Corruption Crimes as amended by Law No. 20 of 2001 concerning Amendments to Law No. 31 of 1999 on the Eradication of Corruption Crimes in conjunction with Article 55, paragraph (1) number 1 of the Criminal

Code in conjunction with Article 64, paragraph (1) of the Criminal Code, as per the first alternative indictment."

B. Witness Testimony

To prove a criminal act committed by the perpetrator, a minimum of two (2) pieces of evidence are required, one of which is the testimony of a witness who has seen, heard, and personally observed the crime [Akhmadi, 2021]. Witness testimony is one of the key pieces of evidence in the criminal justice process in Indonesia. According to Article 184, paragraph (1) of the Criminal Procedure Code (KUHAP), witness testimony is recognized as a valid piece of evidence; however, its use cannot stand alone without support from other pieces of evidence as stipulated in Article 183 of the Criminal Procedure Code and the principle of *unus testis nullus testis* in Article 185, paragraph (2) of the Criminal Procedure Code [20].

Based on the facts revealed during the trial, from the testimony of 23 (twenty-three) witnesses for the prosecution, 2 (two) defense witnesses submitted by Defendant III AND, and 1 (one) crown witness, only 1 (one) witness stated that Defendant FCR, around November 2022, had received a sum of IDR 30,000,000.00 (thirty million rupiahs) at Cafe PP on Jl. Lengkong Besar, Bandung, namely Witness KR. During the trial, Witness KR also stated that the money was given to Defendant FCR upon the instructions of Witness DD. However, under oath during the trial, Witness DD stated that Defendant FCR never asked for a share from him, and he never instructed KR to give money to FCR. Witness DD also testified that he never communicated with Defendant FCR outside of meetings, that the allocation of the IDR 30,000,000 (thirty million rupiahs) to Defendant FCR was not true, and that no such payment ever took place. According to Witness DD, the term "attention" from the Council was not intended as a fee, but rather explained that the attention of the Council members was based on public aspirations for the programs they implemented. In fact, Witness Dadang Darmawan did not approve of any levies for the purpose of giving holiday bonuses (THR).

According to the testimony of Mr. M, who had been examined by the KPK as a witness, and whose statement was recorded in the minutes of this case, a statement was made by Mr. M on May 10, 2025, which was read aloud during the trial by Defendant IV FCR's legal counsel on May 22, 2025. In essence, Mr. M stated that, around late November 2022, he was picked up by Witness KR at the Secretariat of the Bandung City Policy located in Pendopo Bandung using a car to meet with Defendant IV FCR at Cafe PP. This meeting was initiated by Witness KR, and during the meeting, Mr. M did not see Witness KR hand over any money or goods to Defendant IV FCR.

Meanwhile, Witness KR's testimony under oath during the trial stated that he went to Cafe PP alone using a motorcycle and did not arrive together with Mr. M. According to the testimony of Defendant FCR and the statement of Mr. M, the testimony of Witness KR is incorrect because, in fact, KR came together with Mr. M using a car (four-wheeled vehicle).

Thus, it is clear and evident that there is only 1 (one) witness named KR who stated that he gave a sum of IDR 30,000,000.00 (thirty million rupiahs) at Cafe PP, Jl. Lengkong Besar No. 6, Bandung, to Defendant IV FCR. However, the person who was present at that time at Cafe PP, namely Mr. M, as stated in the KPK minutes and his Statement Letter, essentially stated that he did not see KR hand over money or goods to Defendant IV FCR. Witness KR's testimony cannot be trusted because, when compared with the testimony of Witness DD, the Statement Letter from Mr. M, and the testimony of Defendant IV FCR, as previously mentioned, there is inconsistency. Therefore, the credibility of Witness KR's statement is highly questionable.

According to Dewi, et al. [21] a witness is someone who provides information in court to either lighten or burden the defendant's charges based on what the witness has seen, heard, or personally experienced. The presence of a witness is a key piece of evidence in proving a crime. The requirements for someone to be considered a witness are divided into two categories: formal and material requirements. The formal requirement is that a witness's statement is considered valid if the witness has taken an oath, with the exception of witnesses who are minors, whose testimony cannot be sworn in and can only be considered as material for the judge's consideration. The material requirement is that a single witness's statement cannot be considered valid by the court as legitimate evidence (*unus testis nullus testis*).

C. Reasons for Disagreement with the KPK Prosecutor

The reasons why we strongly disagree with the Public Prosecutor's indictment (Requisitoir) from the KPK are as follows:

1. The KPK Public Prosecutor has mixed up Case No. 19/Pid.Sus.TPK/2025/PN.Bdg for Defendant ES with Case No. 20/Pid.Sus.TPK/2025/PN.Bdg for Defendant R and others. This is evidenced, among other things, on pages 214 and 284 of the Public Prosecutor's Requisitoir dated June 10, 2025, where the questions from Defendant ES's Legal Counsel are listed, even though in this case, the questions from Defendant ES's legal counsel should not have been included;
2. The KPK Public Prosecutor created an indictment dated June 10, 2025, which contains a legal analysis not based on the facts revealed during the trial. For example, on pages 669 - 670 of the indictment, it is stated that "around the end of November 2022, DD contacted KR and conveyed that DD had been contacted by Defendant I R and Defendant IV FCR, who said that the CCTV and APILL projects were their 'concerns.' Then, DD asked KR to give money as 'attention for the council' to Defendant II YC amounting to IDR 200,000,000.00 (two hundred million rupiahs), to Defendant I R amounting to IDR 70,000,000.00 (seventy million rupiahs), and to Defendant IV FCR amounting to IDR 30,000,000.00 (thirty million rupiahs)... etc. It is also stated that in November 2022, Defendant IV FCR contacted KR... etc... and arranged to meet at Cafe PP, Jl. Lengkong Besar, Bandung, bringing a sum of IDR 30,000,000.00 (thirty million rupiahs) to meet Defendant IV FCR on the first floor of Cafe PP. After meeting, Defendant IV FCR received the IDR 30,000,000.00 (thirty million rupiahs) in an envelope from KR, with BB No.486 consisting of one cellphone belonging to KR, containing conversations between KR and

FCR about meeting at Cafe PP.";

3. The KPK Public Prosecutor, in making the legal analysis above, is solely relying on mere hallucinations and appears emotional and reckless, as Witness DD clearly stated during the trial that Defendant FCR never asked for a share from him, and he never instructed KR to give money to FCR. Witness DD also testified that he never communicated with Defendant FCR outside of meetings, and that the allocation of IDR 30,000,000 (thirty million rupiahs) to Defendant FCR was untrue and never occurred. According to Witness DD, the term "attention for the council" was not meant as a fee; rather, Witness DD explained that it referred to the attention of the council members based on public aspirations for the programs being implemented. Witness DD also did not approve of any levies for the purpose of giving holiday bonuses (THR). Furthermore, Mr. M, as stated on page 3 above, made a statement that essentially contradicts the testimony of Witness KR. Therefore, there is only 1 (one) witness who claimed that Defendant IV FCR received IDR 30,000,000.00 (thirty million rupiahs), and that witness is KR himself. Witness testimony, as a piece of evidence, is considered a free piece of evidence that lacks perfect probative value and does not bind the judge in any way [6].

D. The KPK Public Prosecutor Mixing Document Evidence with Physical Evidence

In the indictment, the KPK Public Prosecutor, on pages 352-393, lists document evidence from No. 1 to No. 471, while these documents are also listed in the physical evidence inventory.

1. According to AH in his book *Kamus Hukum*, "The term barang bukti (physical evidence) in criminal cases refers to the item in which the crime was committed (the object of the crime) and the item with which the crime was committed, such as a knife used to stab someone. Physical evidence also includes the result of the crime, such as state money used (in corruption) to buy a personal house. In this case, the personal house would be considered physical evidence, or the result of the crime".
2. According to RNA in his book *Barang Bukti dalam Proses Pidana (Physical Evidence in Criminal Procedure)*, "The relationship between physical evidence and testimonial evidence is that physical evidence will become the testimony of a witness if the evidence is presented in court and confirmed by the witness. Likewise, physical evidence will become the testimony of the defendant if the evidence is presented in court and confirmed by the defendant."

Based on the explanation above, physical evidence cannot be converted into written evidence. Therefore, it is entirely incorrect for the KPK Public Prosecutor to treat physical evidence as written evidence.

1. The physical evidence No. 486 mentioned on page 670 of the KPK Public Prosecutor's indictment and used as the legal basis by the Public Prosecutor, when shown in court, essentially contained a conversation about parking fees, not a planned meeting at Cafe PP in Bandung;
2. Furthermore, there is only 1 (one) witness who claims that Defendant IV FCR received IDR 30,000,000.00 (thirty million rupiahs) from KR, which is the testimony of Witness KR himself. The corruption charge brought by the KPK Public Prosecutor is illogical. How could a Member of the Regional People's Representative Council (DPRD) jointly engage in corruption with other Members of DPRD for only IDR 30,000,000.00 (thirty million rupiahs)? According to the testimony of Witness AAP under oath in court, the average salary of a Member of the Bandung City DPRD is IDR 75,000,000.00 (seventy-five million rupiahs) per month, and even Defendant IV FCR's monthly salary is IDR 87,530,930 (eighty-seven million five hundred thirty thousand nine hundred thirty rupiahs). Based on the principle of *unus testis nullus testis*, it can be said that the testimony of a single witness cannot be accepted unless supported by valid evidence. Additionally, the testimony of witnesses standing alone may be used as valid evidence if it is corroborated by other witness testimonies, forming a continuous chain of events in the incident [22].
3. The accusation of *deelneming* (participation) against Defendant IV FCR is also unreasonable. According to legal experts such as Satochid Kartanegara, Wirjono Prodjodikoro, A.Z. Abidin, and Andi Hamzah, the elements of participation must meet the following requirements: conscious cooperation, intentionality to achieve a criminal outcome, and physical cooperation to commit the crime. With the accusation against Defendant I R of receiving IDR 270,000,000.00 (two hundred seventy million rupiahs), Defendant II YC of receiving IDR 500,000,000.00 (five hundred million rupiahs), and Defendant III AND of receiving IDR 200,000,000.00 (two hundred million rupiahs), it is implausible that if there was intentional collaboration between Defendants I, II, III, and IV, Defendant IV FCR would only accept IDR 30,000,000.00 (thirty million rupiahs), especially since his monthly salary is IDR 75,000,000.00 (seventy-five million rupiahs).

Based on all the points outlined above, it is clear and evident that the KPK Public Prosecutor cannot prove the Indictment dated February 4, 2025. Therefore, the KPK Public Prosecutor's indictment dated June 10, 2025, should be rejected, and Defendant IV FCR should be acquitted of all charges.

The research conducted by Moidadi [23] with case number 10/Pid.Sus/Tipikor/2013/PN.PL) can be concluded as follows: first, the role of a witness who benefits the defendant in the trial process greatly assists the judge in determining the sentence. However, in corruption cases, it helps the judge find the material truth where the defendant is acquitted. Secondly, based on the judge's consideration, despite the misuse of funds causing financial losses to the state, the defendant cannot be held accountable for it. Therefore, the court held that the second element of the primary charge was not fulfilled.

Conclusion

The KPK Public Prosecutor's indictment dated June 10, 2025, essentially stating that "Defendant I R, Defendant II YC, Defendant III AND, and Defendant IV FCR have been legally and convincingly proven guilty of committing corruption crimes together," fails to prove the Indictment dated February 4, 2025. Therefore, the KPK Public Prosecutor's indictment dated June 10, 2025, should be rejected, and Defendant IV FCR should be acquitted of all charges.

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