Indonesian Court and Justice Review
ISSN: XXXX-XXXXX (Online)
Vol. 3, No. 1, 2026, pp. 29-42
Published online since February 16, 2026

Corruption in Judicial Case Administration within the Supreme Court: An Analysis of the Ratio Decidendi in Decision No. 7143 K/Pid.Sus/2024

Annisa Putri*
Universitas Negeri Semarang, Semarang, Indonesia
annisaputri@students.uny.ac.id

DOI: https://doi.org/10.65815/w6mnbv94

Submitted: 22-08-2025	Revised: 12-11-2025; 07-01-2026	Accepted: 02-02-2026

*Corresponding Author

Abstract

Corruption involving judicial case administration poses a fundamental threat to judicial independence, institutional integrity, and public confidence in the rule of law. When corrupt conduct occurs within the judicial institution itself, criminal adjudication must address not only the individual responsibility of the accused but also the broader institutional implications of such misconduct. This study analyses Supreme Court Decision No. 7143 K/Pid.Sus/2024 concerning corruption associated with the handling of cases within the Supreme Court. The research aims to identify the principal legal considerations employed by the Supreme Court in establishing criminal liability and to examine how the decision constructs the relationship between abuse of institutional authority, unlawful benefit, and corruption. The study uses a normative juridical methodology based on statutory, conceptual, and case approaches. Primary legal materials include the relevant judicial decision and Indonesian anti-corruption legislation, while secondary materials comprise academic literature concerning judicial ethics, corruption, and institutional accountability. The analysis focuses on the interpretation of the elements of corruption, the evidentiary assessment of interactions surrounding case administration, and the judicial construction of abuse of authority. This study argues that corruption within judicial administration requires a particularly rigorous standard of reasoning because the legitimacy of the adjudicative system depends upon impartiality and procedural integrity. The case demonstrates that criminal accountability and judicial ethics are closely interconnected. The research recommends strengthening institutional safeguards, transparency mechanisms, and judicial accountability to prevent transactional practices from undermining the integrity of judicial decision-making.

[*Korupsi yang melibatkan administrasi kasus peradilan merupakan ancaman mendasar terhadap independensi peradilan, integritas institusional, dan kepercayaan publik terhadap supremasi hukum. Ketika perilaku korupsi terjadi di dalam lembaga peradilan itu sendiri, pengadilan pidana harus* *membahas tidak hanya tanggung jawab individu terdakwa tetapi juga implikasi institusional yang lebih luas dari perilaku tersebut. Studi ini menganalisis Putusan Mahkamah Agung No. 7143 K/Pid.Sus/2024 tentang korupsi yang terkait dengan penanganan kasus di dalam Mahkamah Agung. Penelitian ini bertujuan untuk mengidentifikasi pertimbangan hukum utama yang digunakan oleh Mahkamah Agung dalam menetapkan tanggung jawab pidana dan untuk memeriksa bagaimana putusan tersebut membangun hubungan antara penyalahgunaan wewenang institusional, keuntungan yang tidak sah, dan korupsi. Studi ini menggunakan metodologi yuridis normatif berdasarkan pendekatan hukum, konseptual, dan kasus. Materi hukum primer meliputi putusan peradilan yang relevan dan undang-undang anti korupsi Indonesia, sedangkan materi sekunder terdiri dari literatur akademis tentang etika peradilan, korupsi, dan akuntabilitas institusional. Analisis berfokus pada interpretasi unsur-unsur korupsi, penilaian bukti interaksi seputar administrasi kasus, dan konstruksi yudisial tentang penyalahgunaan wewenang. Studi ini berpendapat bahwa korupsi dalam administrasi peradilan memerlukan standar penalaran yang sangat ketat karena legitimasi sistem peradilan bergantung pada ketidakberpihakan dan integritas prosedural. Kasus ini menunjukkan bahwa akuntabilitas pidana dan etika peradilan saling terkait erat. Penelitian ini merekomendasikan penguatan pengamanan kelembagaan, mekanisme transparansi, dan akuntabilitas peradilan untuk mencegah praktik transaksional merusak integritas pengambilan keputusan peradilan.*]

Keywords: judicial corruption, Supreme Court, judicial integrity, abuse of authority, criminal liability, corruption law

Introduction

Corruption within the administration of judicial cases represents a particularly serious form of institutional misconduct because it directly compromises the integrity of the mechanism through which citizens obtain legal protection. Unlike corruption occurring in ordinary administrative or governmental functions, corruption connected to judicial case administration can interfere with the allocation of justice itself. When an official entrusted with facilitating the administration of cases uses institutional access to obtain private benefits, the resulting harm extends beyond the financial value of the bribe or gratification. It undermines equality before the law, impartial adjudication, procedural fairness, and public confidence in the judiciary. This concern is particularly acute in Indonesia, where a number of corruption cases have involved judges, court officials, and senior judicial administrators. Scholarship on judicial corruption characterizes the phenomenon as a systemic threat because transactional practices can transform access to justice into an informal commodity (Aditya and Al-Fatih 2020; Haryadi and Husna 2021).

Supreme Court Decision No. 7143 K/Pid.Sus/2024 provides a significant case study of this phenomenon. The defendant, Hasbi Hasan, was a civil servant and Secretary of the Supreme Court who was prosecuted for corruption associated with the handling of cases within the Supreme Court. The indictment charged him, among other provisions, under Article 12(a) and Article 12B of Law No. 31 of 1999 concerning the Eradication of Corruption Crimes as amended by Law No. 20 of 2001, in conjunction with provisions concerning participation and continuing offences. The case concerned the receipt of bribes and gratification associated with efforts to influence the handling of litigation involving Koperasi Simpan Pinjam Intidana. The trial court convicted Hasbi of corruption committed jointly and continuously and a separate corruption offence, imposing six years' imprisonment, a fine of IDR 1 billion, and an additional payment of IDR 3,880,844,400. The DKI Jakarta High Court affirmed the judgment, and the Supreme Court subsequently rejected both the public prosecutor's and defendant's cassation applications. (Supreme Court of the Republic of Indonesia 2024).

The case is important not merely because of the identity of the defendant, but because of the institutional position through which the alleged corruption was facilitated. Hasbi Hasan occupied the position of Secretary of the Supreme Court, a senior administrative position within the institution responsible for the highest level of judicial administration. The proven conduct involved an alleged effort to use access and influence within the Supreme Court to facilitate the desired outcome of litigation. According to the case materials, the corruption concerned a payment of approximately IDR 11.2 billion associated with the handling of the Intidana case, while the gratification component included money and travel and accommodation facilities valued at approximately IDR 630.8 million. (Supreme Court of the Republic of Indonesia 2024). The legal significance therefore lies in the relationship between institutional authority, access to judicial administration, private benefit, and the criminal-law concept of bribery or gratification.

The problem is further complicated by the distinction between judicial independence and judicial accountability. Judicial independence protects judges and courts from improper external interference, but independence does not imply immunity from criminal or ethical accountability. On the contrary, judicial independence requires institutional integrity because a judiciary perceived as transactional cannot effectively perform its constitutional role. Recent scholarship concerning judicial integrity in Indonesia emphasizes that the legitimacy of judicial power depends upon independence, impartiality, professional ethics, and accountability (Wibisana 2023). The corruption of a senior court administrator is therefore not simply an individual criminal act. It can create institutional conditions in which litigants, lawyers, intermediaries, and court personnel perceive case outcomes as negotiable. The resulting threat is structural: the judiciary may formally retain independence while substantively losing impartiality.

Previous studies have examined judicial corruption in Indonesia from several perspectives. Aditya and Al-Fatih analyze the mechanisms through which judicial corruption may arise and emphasize the importance of monitoring litigation costs and improving transparency within judicial processes (Aditya and Al-Fatih 2020). Haryadi and Husna conceptualize judicial corruption as a paradox in which the institution responsible for enforcing anti-corruption law can itself become an environment for corrupt conduct (Haryadi and Husna 2021). More recent scholarship focuses on judicial integrity, arguing that judges handling corruption cases require professional integrity, impartiality, and institutional cultures that reject bribery and abuse of authority (Wibisana 2023). Meanwhile, scholarship concerning the Judicial Commission and judicial accountability emphasizes the continuing tension between preserving judicial independence and establishing effective mechanisms of external and internal oversight.

Nevertheless, an analytical gap remains concerning corruption committed through judicial case administration rather than through the direct exercise of adjudicative authority by a judge. Existing literature often uses the term "judicial corruption" broadly, encompassing judges, prosecutors, police officers, lawyers, and court administrators. Such a broad conception is useful for identifying systemic corruption but may obscure important distinctions in criminal liability. A court administrator who promises or facilitates access to a judge does not necessarily exercise adjudicative power in the same manner as a judge who accepts a bribe to alter a judgment. Decision No. 7143 K/Pid.Sus/2024 therefore provides an opportunity to examine how Indonesian anti-corruption law constructs liability when institutional authority is converted into a transactional resource without necessarily involving the defendant as the ultimate decision-maker in the judicial proceeding.

This study employs a normative juridical method using statutory, conceptual, and case approaches. The statutory approach examines Law No. 31 of 1999 as amended by Law No. 20 of 2001 concerning the Eradication of Corruption Crimes, particularly Articles 12(a), 12B, and 18, together with relevant provisions of the Indonesian Criminal Code concerning participation and continuing offences. The case approach focuses on Supreme Court Decision No. 7143 K/Pid.Sus/2024 and the judgments of the Corruption Court of the Central Jakarta District Court and the DKI Jakarta High Court. The conceptual approach employs the concepts of bribery, gratification, abuse of authority, institutional corruption, judicial integrity, and judicial accountability. The primary legal materials are analyzed qualitatively through doctrinal interpretation, while secondary materials consist principally of scholarly literature concerning corruption and judicial integrity.

The urgency of this research lies in the fact that corruption in judicial administration has consequences that cannot be measured solely through the monetary value received by an offender. A bribe paid to influence a judicial case potentially affects not only the parties directly involved but also the credibility of the judicial process and the principle that legal outcomes should depend upon law and evidence rather than financial capacity or institutional connections. Research on judicial corruption in Indonesia has emphasized that corrupt practices can emerge through multiple entry points within the litigation process, including interactions among lawyers, court officials, judges, and intermediaries (Aditya and Al-Fatih 2020). The contribution of this study is therefore to reconstruct the *ratio decidendi* of Decision No. 7143 K/Pid.Sus/2024 and demonstrate how the Supreme Court's approach to criminal liability can be understood within the broader framework of institutional integrity. The study argues that the case illustrates a form of institutional corruption in which administrative access to judicial processes becomes the object of illicit exchange, thereby requiring criminal accountability together with structural prevention.

The Institutional Context and Legal Structure of the Corruption

The factual structure of Decision No. 7143 K/Pid.Sus/2024 demonstrates why corruption in judicial administration requires a distinction between formal authority and practical influence. Hasbi Hasan served as Secretary of the Supreme Court rather than as a member of the judicial panel deciding the underlying litigation. Nevertheless, the prosecution alleged and the courts found that his position enabled him to participate in efforts to facilitate the handling of cases according to the interests of private parties. The case materials identify Dadan Tri Yudianto, a former independent commissioner of Wijaya Karya, as a co-perpetrator, and identify Heryanto Tanaka, a debtor associated with KSP Intidana, as the party who provided the bribe. The purpose of the payment was connected to the handling of Supreme Court case No. 326 K/Pid/2022 and related bankruptcy proceedings. (Supreme Court of the Republic of Indonesia 2024).

This institutional setting is legally significant because the value exchanged was not merely an official administrative service. The alleged transaction concerned access to and influence over a judicial process. In ordinary administrative corruption, the corrupt official may directly control the governmental decision for which payment is made. Judicial case administration is different because the final decision formally belongs to judges. An intermediary or administrator may nevertheless possess valuable institutional access, information, communication channels, or relationships with judicial actors. Consequently, the "commodity" being sold is not necessarily a judicial decision itself but the capacity to influence, facilitate, or obtain preferential access to the decision-making process.

The Supreme Court's decision should therefore be understood against the structure of Articles 12(a), 12B, and 18 of the Anti-Corruption Law. Article 12(a) addresses public officials or state administrators who receive gifts or promises because of their authority in relation to their position, while Article 12B regulates gratification received by public officials or state administrators that is related to their office and contrary to their duties or obligations. Article 18 establishes additional sanctions, including payment of replacement money. The legal framework consequently recognizes that corruption may occur even where the corrupt benefit is not equivalent to a direct purchase of a specific official act. The central concern is the conversion of public office into a source of private benefit.

The case materials show that the prosecution charged Hasbi under both the bribery and gratification provisions, together with Article 55(1)(1) KUHP concerning participation and Article 64(1) concerning continuing offences. The trial court ultimately found him guilty of corruption committed jointly and continuously under the first cumulative charge and a separate corruption offence under the second cumulative charge. The sentence imposed was six years' imprisonment and a fine of IDR 1 billion, together with replacement money of IDR 3,880,844,400. The DKI Jakarta High Court affirmed the judgment, and the Supreme Court rejected both cassation applications. (Supreme Court of the Republic of Indonesia 2024).

The institutional context also demonstrates why corruption in the judiciary can be understood as a form of abuse of entrusted power. The official position does not belong personally to the officeholder. It is conferred for the performance of public functions and is accompanied by obligations of neutrality, professionalism, and integrity. When institutional access is used to facilitate private transactions, the officeholder transforms public authority into a private economic resource. This is consistent with the broader conceptualization of corruption as the misuse of entrusted power for private gain. More importantly, within the judiciary, the abuse of entrusted power has a multiplier effect because judicial administration determines how legal disputes enter, move through, and are resolved by the justice system.

The case thus demonstrates that judicial corruption should not be restricted conceptually to the moment when a judge changes a judgment in exchange for money. It can begin earlier, at the stage where parties seek preferential access to judicial officials, attempt to obtain information about deliberations or case allocation, or seek intermediaries capable of influencing the progress of litigation. Aditya and Al-Fatih's study of judicial corruption in Indonesia similarly emphasizes that corruption may occur across different stages and actors in the judicial process and that monitoring litigation costs and interactions within the justice system is essential for prevention (Aditya and Al-Fatih 2020).

The Supreme Court's Ratio Decidendi and the Construction of Criminal Liability

The central *ratio decidendi* of Decision No. 7143 K/Pid.Sus/2024 can be reconstructed through the Court's treatment of the statutory elements, the evidentiary record, and the relationship between Hasbi's institutional position and the benefits he received. The Supreme Court ultimately rejected both the public prosecutor's and defendant's cassation applications, thereby leaving the lower courts' finding of criminal responsibility and six-year sentence intact. The decision was rendered by a cassation panel chaired by Justice Desnayeti, with Agustinus

Purnomo Hadi and Yohanes Priyana as members. The judgment was pronounced on December 3, 2024. (Supreme Court of the Republic of Indonesia 2024).

The first analytical component is the status of the defendant as a public official. The application of the anti-corruption provisions is inseparable from the defendant's position as Secretary of the Supreme Court. The statutory concept of bribery and gratification under the Anti-Corruption Law is not designed to criminalize every private receipt of money by a public employee. Rather, the receipt must possess the legally required relationship with the recipient's public office and official authority. The case therefore required the courts to establish that the benefits received were not ordinary private transactions but were connected to the defendant's institutional position and the performance or misuse of functions associated with that position.

The second component is the existence of a prohibited benefit. The prosecution alleged that Hasbi and Dadan received approximately IDR 11.2 billion associated with the handling of the Intidana case. In addition, the gratification charge concerned money and facilities for travel and accommodation valued at approximately IDR 630.844 million. The evidence reportedly included extensive documentary and electronic materials, including telephone recordings and digital files. The case record contains hundreds of evidentiary items, including voice-call recordings and electronic documents, demonstrating the central importance of communications and documentary evidence in establishing the relationships among the parties. (Supreme Court of the Republic of Indonesia 2024).

The evidentiary structure is significant because corruption involving judicial administration is often mediated through indirect communications rather than explicit written agreements. The parties may avoid stating openly that money is being exchanged for a particular judicial outcome. Instead, the relationship may be demonstrated through a combination of conversations, financial transfers, meetings, intermediary conduct, and subsequent official or administrative actions. This makes the evidentiary assessment of context particularly important. Criminal liability cannot rest merely on an individual's proximity to a judicial process; the prosecution must establish the legally required connection between the defendant, the benefit, and the prohibited purpose.

The third component is participation and collective action. Article 55(1)(1) KUHP permits criminal responsibility to be imposed upon persons who jointly commit an offence. In the Hasbi case, the courts treated the defendant's conduct as involving joint action with Dadan Tri Yudianto. The legal significance of this finding is that corruption in judicial administration may operate through networks rather than through a single actor. The person providing money, the intermediary, the institutional insider, and the person capable of influencing a judicial process may perform different functions within the same criminal scheme. Criminal law must therefore distinguish individual roles while recognizing the collective structure of the offence.

The fourth component is the concept of a continuing offence under Article 64 KUHP. The trial court found the first corruption offence to have been committed jointly and continuously. This characterization reflects the court's assessment that the relevant acts were connected through a continuing criminal intention rather than being completely isolated transactions. The doctrine is important because judicial corruption schemes may involve repeated payments or interactions over a period of time, each of which forms part of a broader arrangement. Nevertheless, the continuing-offence doctrine requires careful application because repeated transactions should not automatically be collapsed into a single offence unless the legally required relationship of unity is established.

The *ratio decidendi* therefore reflects an integrated construction of criminal liability: public-office status + prohibited benefit + relationship to institutional authority + collective participation + evidentiary proof of the underlying scheme. This approach is consistent with the need to distinguish genuine corruption from legitimate professional or administrative interactions. At the same time, it demonstrates why corruption occurring within judicial institutions demands detailed judicial reasoning. The legitimacy of a corruption conviction depends not merely on the seriousness of the institutional setting but on proof that each statutory element has been satisfied beyond the required criminal standard.

Judicial Administration as an Object of Corruption and the Relationship between Criminal Liability and Judicial Integrity

One of the most important implications of the case is the recognition that judicial administration itself can become the object of corruption. Judicial corruption is often discussed as though it necessarily requires the manipulation of a final judicial decision. Such an approach is too narrow. Access to the judiciary has economic and strategic value even before a judgment is rendered. Parties may seek information, expedited processing, favorable case assignment, communication with decision-makers, or intervention in the handling of a case. When institutional officials sell access to these functions, the integrity of the judicial process can be compromised even if the ultimate judgment remains formally the product of judicial deliberation.

This phenomenon can be conceptualized as a form of institutional corruption. The concept emphasizes the use of institutional structures for purposes inconsistent with the institution's public function. In the Hasbi case, the institutional function of the Supreme Court is to administer and adjudicate cases according to law, impartiality, and procedural fairness. A transactional relationship in which parties provide money in exchange for access to or influence over the handling of cases reverses that institutional logic. Instead of legal rules determining the treatment of litigants, private resources become a mechanism for obtaining preferential treatment.

Research on judicial corruption in Indonesia supports this institutional understanding. Haryadi and Husna describe judicial corruption as a paradox because the criminal justice system tasked with enforcing anti-corruption norms can itself be weakened by corrupt actors within the system (Haryadi and Husna 2021). Aditya and Al-Fatih likewise identify the need to monitor litigation costs and judicial processes because corruption can develop through interactions among litigants, lawyers, and judicial personnel (Aditya and Al-Fatih 2020). These studies indicate that the problem cannot be solved exclusively through punishment after corruption has occurred. Institutional design and preventive controls are equally important.

The Hasbi case is especially significant because the defendant was not an ordinary court employee but the Secretary of the Supreme Court. The institutional seniority of the position increases the potential systemic consequences of misconduct. A senior administrator may possess greater access to information, personnel, and organizational processes than ordinary employees. This does not automatically establish criminal liability, but once the required criminal elements are proven, the position becomes highly relevant to understanding the nature and potential consequences of the misconduct. The case therefore demonstrates why anti-corruption enforcement within the judiciary must be capable of reaching senior administrative actors rather than concentrating exclusively on judges.

Judicial integrity is also closely connected to the principle of judicial independence. Independence means that judicial decisions should be protected from improper pressure, including pressure generated by political actors, economic interests, litigants, or other officials within the State. If judicial administrators themselves become intermediaries for private influence, formal independence may remain intact while substantive independence is compromised. Wibisana argues that integrity among judges handling corruption cases requires honesty, commitment to judicial responsibilities, adherence to law, and resistance to conflicts between personal interests and institutional duties (Wibisana 2023). Although Hasbi was an administrator rather than a judge, the underlying principle applies equally: persons occupying positions within the judicial institution must not convert institutional access into private advantage.

This relationship demonstrates why criminal accountability and judicial ethics should be treated as complementary rather than competing mechanisms. Criminal law establishes minimum standards of conduct and imposes coercive sanctions when the elements of an offence are proven. Judicial ethics, by contrast, establishes professional standards designed to prevent conflicts of interest, inappropriate relationships, and conduct that undermines institutional dignity even when the criminal threshold is not reached. A comprehensive integrity system requires both. The enforcement of ethical codes therefore should not be viewed as an alternative to criminal prosecution; it is a preventive layer that can identify and address risks before they develop into criminal schemes.

The broader institutional consequence is the erosion of public trust. Citizens cannot meaningfully exercise their right of access to justice if they believe that judicial outcomes or procedural treatment depend upon private payments. Public trust is therefore not merely a sociological consequence of judicial corruption but an element of the institutional legitimacy of courts. Recent scholarship on Indonesian corruption trials similarly identifies judicial accountability and public perception as interconnected dimensions of anti-corruption enforcement (Arifin et al. 2025).

Proportionality of Punishment, Institutional Harm, and the Need for Stronger Preventive Mechanisms

The final issue concerns the adequacy of the sanction imposed in Decision No. 7143 K/Pid.Sus/2024. The trial court imposed six years' imprisonment, a fine of IDR 1 billion, and replacement money of IDR 3,880,844,400, and the sentence was affirmed on appeal and cassation. The public prosecutor had sought a substantially heavier sentence of thirteen years and eight months, demonstrating a significant difference between prosecutorial and judicial assessments of appropriate punishment. (Supreme Court of the Republic of Indonesia 2024). The Supreme Court's rejection of the prosecutor's cassation means that the six-year sentence became final.

The proportionality of the sentence should be assessed within the statutory framework rather than solely by comparing it with the prosecutor's demand. Anti-corruption sentencing must consider the seriousness of the conduct, the offender's role, the amount and nature of the illicit benefit, the institutional position abused, the consequences for the administration of justice, and the need for deterrence. In a judicial corruption case, the harm cannot be measured solely by the amount of money received. A bribe of a particular monetary value may produce institutional harm considerably greater than the corresponding financial benefit because it can undermine the legitimacy of multiple judicial proceedings.

This institutional dimension suggests that sentencing in judicial corruption should expressly recognize institutional harm as an aggravating consideration. A person who misuses a public office responsible for judicial administration may inflict harm upon the credibility of the justice system beyond the immediate transaction. This does not mean that every judicial official should automatically receive a harsher sentence than another public official convicted under the same statutory provision. Rather, the institutional position should be evaluated within the individualized sentencing framework, with the court explaining why the position increased the culpability or consequences of the offence.

The issue also relates to the Supreme Court's own sentencing guidelines. PERMA No. 1 of 2020 provides guidelines for sentencing corruption offences and seeks to promote proportionality and consistency. Recent scholarship has criticized inconsistent application of the guidelines and argued that subjective interpretation can contribute to sentencing disparities and weaken public confidence in judicial integrity (Cristofel and Prasetyo 2025). The Hasbi case therefore provides an opportunity to emphasize that sentencing guidelines should be applied transparently, particularly where the defendant occupied a senior position within the judiciary itself.

The replacement-money order is also significant. The judgment required Hasbi to pay IDR 3,880,844,400, with a subsidiary imprisonment consequence if the payment was not made. Such a sanction serves a different function from imprisonment. Imprisonment expresses penal condemnation and serves deterrent and rehabilitative purposes, while replacement money seeks to recover the economic benefit or loss associated with corruption. Effective anti-corruption policy requires both dimensions because imprisonment alone does not necessarily reverse the economic consequences of corruption.

Nevertheless, criminal punishment is fundamentally reactive. Once a senior judicial administrator has been convicted, the criminal justice system has already failed to prevent the misuse of institutional access. Prevention must therefore accompany prosecution. Institutional safeguards should include transparent case-management systems, auditable access to case information, separation of administrative and substantive judicial functions, systematic recording of communications involving litigants and court personnel, conflict-of-interest declarations, rotation of officials in sensitive administrative positions, and stronger monitoring of unusual interactions between court officials and litigants or intermediaries.

Digitalization can contribute to this preventive framework. Electronic case-management systems can reduce opportunities for discretionary manipulation by creating auditable records of case allocation, movement, access, and administrative decisions. However, technology is not a complete solution. A corrupt official may exploit technological systems if institutional controls are weak. Digital transparency must therefore be combined with independent auditing, whistleblower protection, ethical training, and credible sanctions for violations.

The case also demonstrates the importance of external accountability mechanisms. Judicial independence should not be interpreted as institutional isolation. A judiciary that cannot be independently monitored risks transforming independence into unaccountability. At the same time, external oversight must be carefully designed so that it does not permit political actors to interfere with adjudicative decision-making. The appropriate model is therefore independent accountability without substantive interference: oversight should examine corruption, conflicts of interest, financial integrity, and procedural misconduct without dictating the legal outcome of cases.

The final institutional lesson is that anti-corruption enforcement should target the network rather than only the individual. The Hasbi case involved a relationship among a public official, an intermediary, and private interests seeking favorable treatment in litigation. Judicial corruption can survive when only one participant is prosecuted while the underlying transactional infrastructure remains intact. Effective enforcement therefore requires financial investigation, tracing of communication networks, identification of intermediaries, monitoring of professional facilitators, and examination of the institutional pathways through which illicit influence operates. Such an approach transforms a single corruption prosecution into an opportunity for institutional reform.

Conclusion

Supreme Court Decision No. 7143 K/Pid.Sus/2024 demonstrates that corruption within judicial institutions can occur through the manipulation of case administration and institutional access even where the defendant is not himself a member of the judicial panel deciding the underlying litigation. Hasbi Hasan, as Secretary of the Supreme Court, was convicted for corruption associated with the handling of cases involving KSP Intidana. The courts found criminal responsibility under the Anti-Corruption Law in conjunction with provisions concerning participation and continuing offences, and the six-year imprisonment, IDR 1 billion fine, and replacement-money order were ultimately affirmed when the Supreme Court rejected both cassation applications. (Supreme Court of the Republic of Indonesia 2024).

The *ratio decidendi* of the decision illustrates that corruption liability in judicial administration is constructed through the relationship among the offender's public position, the receipt of prohibited benefits, the connection between those benefits and institutional authority, participation in the criminal scheme, and the evidentiary proof of the relevant transactions. The case demonstrates why judicial corruption should not be defined narrowly as the direct manipulation of judicial judgments. Institutional access, administrative influence, and relationships with judicial decision-makers can themselves become objects of illicit exchange. When public office is converted into a mechanism for facilitating private interests in litigation, the resulting misconduct threatens the principles of equality, impartiality, and access to justice.

The broader implication is that criminal accountability must be accompanied by institutional prevention. Judicial integrity depends upon more than the personal morality of individual officeholders; it requires organizational systems capable of making corrupt transactions difficult to initiate, detect, and conceal. Transparent case-management systems, independent monitoring, conflict-of-interest controls, digital audit trails, whistleblower protection, ethical enforcement, and consistent application of corruption sentencing guidelines are therefore essential. The Hasbi case ultimately demonstrates that protecting judicial independence requires simultaneously strengthening judicial accountability. Independence without integrity risks becoming institutional insulation, while accountability without independence risks external interference. A legitimate judiciary requires both:

freedom from improper influence and effective mechanisms for sanctioning those who convert judicial authority or access into private gain.

References

Aditya, Zaka Firma, and Sholahuddin Al-Fatih. 2020. "Monitoring of Litigation Costs and Efforts to Eradicate Judicial Corruption Practices." *Indonesian Journal of Advocacy and Legal Services* 2 (2). https://doi.org/10.15294/ijals.v2i2.38148.

Arifin, Ridwan, Auliya Rochman, Ayon Diniyanto, and Rizki Sulthoni. 2025. "The New Face of Corruption Trials in Indonesia: Political Influence, Public Perception, and Judicial Accountability." *Indonesian Court and Justice Review* 2 (2). https://doi.org/10.65815/31njav88.

Corruption Eradication Commission of the Republic of Indonesia. 2025. *Annual Report and Implementation Report*. Jakarta: KPK.

Cristofel, Moses, and Boedi Prasetyo. 2025. "Inconsistency in the Implementation of Corruption Criminalization Guidelines Based on PERMA No. 1 of 2020 in the Harvey Moeis Case Decision." *Jurnal Ilmu Hukum Kyadiren* 7 (2). https://doi.org/10.46924/jihk.v7i2.367.

Crouch, Melissa. 2019. *The Politics of Court Reform: Judicial Change and Legal Culture in Indonesia*. Cambridge: Cambridge University Press.

Haryadi, Slamet, and Nurlaili Husna. 2021. "Judicial Corruption: A Paradox of the Criminal Justice System in the Law Enforcement on Corruption Crime in Indonesia." In *Proceedings of the International Conference on Law, Environment, Culture and Human Rights*. https://doi.org/10.4108/eai.5-8-2019.2308666.

Indonesia. 1981. *Law No. 8 of 1981 concerning the Criminal Procedure Code (Kitab Undang-Undang Hukum Acara Pidana)*.

Indonesia. 1999. *Law No. 31 of 1999 concerning the Eradication of Corruption Crimes*.

Indonesia. 2001. *Law No. 20 of 2001 concerning Amendments to Law No. 31 of 1999 concerning the Eradication of Corruption Crimes*.

Indonesia. 2009. *Law No. 48 of 2009 concerning Judicial Power*.

Indonesia. 2020. *Supreme Court Regulation No. 1 of 2020 concerning Sentencing Guidelines for Corruption Crimes*.

Supreme Court of the Republic of Indonesia. 2024. *Decision No. 23/Pid.Sus-TPK/2024/PT DKI*. June 20, 2024.

Supreme Court of the Republic of Indonesia. 2024. *Decision No. 7143 K/Pid.Sus/2024*. December 3, 2024.

Sutrisno, Nandang, Despan Heryansyah, Sahid Hadi, and Christopher M. Cason. 2022. "The Regulation of Defendant's Religious Identity in Court Decisions." *BESTUUR* 10 (2).

Wibisana, Andi Wahyu. 2023. "Developing the Integrity of Corruption Crime Judges: Evidence in Indonesia." *International Journal of Research in Business and Social Science* 12 (9): 460–476. https://doi.org/10.20525/ijrbs.v12i9.3060.

***

Acknowledgment
None

Funding Information
None

Conflicting Interest Statement
The authors state that there is no conflict of interest in the publication of this article.

Publishing Ethical and Originality Statement
All authors declared that this work is original and has never been published in any form and in any media, nor is it under consideration for publication in any journal, and all sources cited in this work refer to the basic standards of scientific citation.

Generative AI Statement
N/A