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Disparities in Corruption Rulings within the Same Jurisdiction: Judicial Reasoning and the Construction of State Financial Loss in Village Videography Cases

Disparitas Putusan Perkara Korupsi dalam Yurisdiksi yang Sama: Penalaran Hakim dan Konstruksi Kerugian Keuangan Negara dalam Perkara Jasa Videografi Desa

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Abstract

Sentencing disparities in corruption cases within the same jurisdiction raise concerns about legal certainty, particularly when similar factual circumstances produce different judicial outcomes. This study aims to analyze disparities in corruption rulings involving village videography services in Karo Regency by examining the application of offense elements, the construction of state financial loss, and the *ratio decidendi*. This normative legal study employs case and conceptual approaches through comparative analysis of four court rulings within the same jurisdiction. The findings show that the disparity is rooted not only in different verdicts but also in differences in judicial reasoning, particularly in connecting the unlawful act element, the actual performance of videography services, and state financial loss. The study contributes a comparative framework for understanding judicial consistency and demonstrates the importance of transparent and rational *ratio decidendi* in strengthening legal certainty in service-based corruption adjudication.

Keywords: Sentencing Disparities; Village Videography Corruption; State Financial Loss; Ratio Decidendi; Legal Certainty

Abstrak

Disparitas putusan perkara korupsi dalam yurisdiksi yang sama menimbulkan persoalan kepastian hukum, terutama ketika kondisi faktual yang serupa menghasilkan putusan yang berbeda. Penelitian ini bertujuan menganalisis disparitas putusan dalam perkara korupsi jasa videografi desa di Kabupaten Karo dengan mengkaji penerapan unsur tindak pidana, konstruksi kerugian keuangan negara, dan *ratio decidendi*. Penelitian hukum normatif ini menggunakan pendekatan kasus dan konseptual melalui analisis komparatif terhadap empat putusan dalam yurisdiksi yang sama. Hasil penelitian menunjukkan bahwa disparitas tidak hanya terletak pada perbedaan putusan, tetapi juga pada perbedaan penalaran hakim, terutama dalam menghubungkan unsur perbuatan melawan hukum, pelaksanaan aktual jasa videografi, dan kerugian keuangan negara. Penelitian ini berkontribusi melalui kerangka komparatif untuk memahami konsistensi penalaran hakim serta menunjukkan pentingnya *ratio decidendi* yang transparan dan rasional dalam memperkuat kepastian hukum pada perkara korupsi berbasis jasa.

Kata Kunci: Disparitas Putusan; Korupsi Jasa Videografi Desa; Kerugian Keuangan Negara; Ratio Decidendi; Kepastian Hukum



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INTRODUCTION

Corruption adjudication in Indonesia presents a legal problem that extends beyond the existence of anti-corruption regulations. A significant concern is how courts apply offense elements and construct state financial loss when deciding cases with similar factual circumstances. Recent research shows that disparities in corruption judgments may emerge from differences in judicial interpretation and the assessment of legal elements rather than merely from differences in sentencing severity.¹ This issue becomes particularly important when courts within the same jurisdiction reach different conclusions concerning comparable conduct. Such differences raise questions about the consistency of judicial reasoning and the predictability of legal consequences. Therefore, this research focuses on sentencing disparities as a problem of judicial reasoning, particularly in determining whether the elements of corruption offenses and state financial loss are consistently constructed across comparable cases.

The problem is significant because inconsistent judicial reasoning can weaken legal certainty and make the application of criminal law less predictable. Legal certainty requires comparable factual circumstances to be assessed through clear and rational legal criteria, although different outcomes may remain justified when relevant facts or evidence differ. Hasibuan shows that inconsistency in judicial decisions can create uncertainty in the development of jurisprudence.² In corruption cases, the problem becomes more complex when state financial loss is determined through different methods. Administrative expenditure does not necessarily provide a complete picture of substantive economic loss, particularly when public funds are used to obtain professional services. This issue is relevant to village videography cases because the economic value of completed creative services may not always be represented by administrative expenditure alone. Consequently, differences in assessing service performance and financial loss may affect the legal characterization of the alleged offense.

The Karo Regency village videography cases provide a specific context for examining this problem. Four defendants involved in village videography activities within the same jurisdiction received different judicial outcomes, including an acquittal and three convictions.³ The case also attracted attention through online media coverage.⁴ This research does not assume that public attention caused the different outcomes because the study employs a normative legal approach rather than an empirical design. Instead, the judgments are examined through three analytical dimensions: the application of the unlawful act element, the method used to assess state financial loss, and the construction of the ratio decidendi. The comparison therefore proceeds from the legal provisions and factual findings contained in the judgments, then examines how judges connected those materials to their conclusions. This approach allows the disparity to be analyzed through judicial reasoning rather than through verdict differences alone.

Research on disparities in corruption decisions has been conducted from several legal perspectives. Fadhlansyah shows that normative criminal law in Indonesia may be applied through a predominantly textual approach, but the study does not specifically examine the

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- 1 Raja Didit Pratama Munthe, Ahmad Ansyari Siregar, and Nimrot Siahaan, "Legal Analysis of the Supreme Court Decision Regarding the Annulment of Acquittal in Corruption Crime Case: A Study of Decision Number 1227 K/Pid.Sus/2022," *Sign: Jurnal Hukum* 7, no. 2 (2026): 1375–88, <https://doi.org/10.37276/sjh.v7i2.651>.
 - 2 Himlih Hasibuan, "Kepastian Hukum Dalam Putusan Hakim: Studi Terhadap Inkonsistensi Yurisprudensi Mahkamah Agung," *Yudhistira: Jurnal Yurisprudensi, Hukum Dan Peradilan* 2, no. 3 (2024): 76–84, <https://doi.org/10.59966/yudhistira.v2i3.1670>.
 - 3 Pengadilan Negeri Medan, "Putusan Nomor 27/Pid.Sus-Tpk/2025/PN Mdn," 2026.
 - 4 Arifin Al Alamudi, "Amsal Sitepu Bebas, Begini Nasib 4 Videografer Lain Yang Ditangkap Kejari Karo," *IDN Times (Sumut)*, 2026, <https://sumut.idntimes.com/news/sumatra-utara/amsal-sitepu-bebas-begini-nasib-4-videografer-lain-yang-ditangkap-kejari-karo-00-hz1ln-jdhrxf>.

construction of state financial loss in service-related cases.⁵ Zuhrah finds that judicial independence is important in addressing disparities in corruption judgments, yet the analysis does not specifically connect judicial reasoning with the valuation of completed services.⁶ Munthe et al. demonstrate that differences in judicial reasoning and the assessment of unlawful conduct and state loss can influence corruption adjudication, but their study concerns a land procurement case rather than a service-based transaction.⁷ Meanwhile, López Castillo et al. examine media pressure and judicial processes in Peru, but their study addresses a different legal system and empirical context.⁸ These studies leave a specific gap concerning service-based corruption cases within the same Indonesian jurisdiction.

This research aims to analyze disparities in corruption judgments involving village videography services in Karo Regency by examining the consistency of offense-element application, the construction of state financial loss, and the ratio decidendi underlying the judgments. Its urgency lies in clarifying how courts distinguish administrative expenditure from substantive financial loss when the contracted services have actually been performed. The study also considers public opinion and media exposure as contextual factors surrounding judicial proceedings without treating them as proven determinants of judicial outcomes. This distinction is important for maintaining methodological consistency between the normative research design and the analysis of judicial independence. By comparing four judgments within the same jurisdiction, the research seeks to identify the specific points at which judicial reasoning diverges and to explain the implications of those differences for legal certainty. The findings are expected to contribute to clearer and more accountable approaches to corruption adjudication involving service-based public expenditure.

Method

This study is a normative legal research project employing case and conceptual approaches to analyze sentencing disparities in corruption cases within the same jurisdiction, with particular attention to the application of offense elements and the construction of state financial loss.⁹ The study does not employ an empirical approach; social factors, including public opinion and media exposure, are treated solely as contextual considerations in examining the broader environment surrounding judicial reasoning. The study focuses on corruption-related court rulings from the Medan District Court that are officially published and verifiable through the Case Tracking Information System (SIPP) or other official judicial sources. The selection of cases is based on their similar factual patterns and legal constructions, enabling a focused comparison of how the courts addressed comparable corruption-related circumstances.

Data were collected through documentary research involving primary and secondary legal materials. Primary legal materials consisted principally of court rulings, while secondary legal materials included academic literature and scholarly journal articles relevant to corruption law, judicial reasoning, state financial loss, legal certainty, and judicial independence. The collected

5 Holly Fadhlansyah, “Analisis Kritis Atas Implementasi Hukum Pidana Normatif Dalam Sistem Peradilan Indonesia,” *Sumbang Law Journal* 2, no. 2 (2024): 44–55, <https://jurnal.umsb.ac.id/index.php/smb12lj/article/view/5767/3904>.

6 Zuhrah, “Urgensi Independensi Hakim Dalam Berbagai Disparitas Putusan Perkara Korupsi,” *Sangaji: Jurnal Pemikiran Syariah Dan Hukum* 7, no. 1 (2023): 53–73, <https://doi.org/10.52266/sangaji.v6i2.1259>.

7 Munthe, Siregar, and Siahaan, “Legal Analysis of the Supreme Court Decision Regarding the Annulment of Acquittal in Corruption Crime Case: A Study of Decision Number 1227 K/Pid.Sus/2022.”

8 Alan Christian López Castillo et al., “Media Pressure and Pretrial Detention Requirements in Ucayali, Peru: A Study Based on Neutrosophic Measures,” *Neutrosophic Sets and Systems* 74 (2024): 538–48, <https://doi.org/10.5281/zenodo.14421765>.

9 Zainuddin Ali, *Metode Penelitian Hukum* (Sinar Grafika, 2021).

materials were analyzed qualitatively using a comparative method to examine differences and similarities among the selected rulings. The analysis employed three principal parameters: the application of the “unlawful act” element, the methodology used to assess state financial loss, and the construction of the ratio decidendi. These parameters were used to examine how judges connected statutory provisions, factual circumstances, evidence, and legal conclusions. The analysis ultimately evaluates the consistency of judicial reasoning and its implications for legal certainty.

RESULTS AND DISCUSSION

Disparities in Judicial Reasoning and the Construction of State Financial Loss

Disparities in judicial rulings within the same jurisdiction raise a question about the consistency of judicial reasoning. Legal certainty requires legal norms to be applied predictably and rationally, particularly when cases involve comparable factual and legal circumstances.¹⁰ In this context, the ratio decidendi provides the logical connection between legal rules, established facts, and judicial conclusions.¹¹ The issue is therefore not simply whether defendants received different verdicts, but why similar factual circumstances produced different legal consequences. Judicial reasoning must be examined by identifying the statutory provisions applied, the elements considered proven or unproven, and the evidence connecting those elements with alleged state financial loss. Such an examination allows sentencing disparity to be distinguished from legitimate differences arising from materially different facts, evidence, or legal circumstances.

The Karo Regency village videography cases provide a concrete basis for examining this problem because four defendants were prosecuted in separate proceedings involving broadly similar activities but received different outcomes. Amsal Christy Sitepu was acquitted, while Jesaya Perangin Angin, Toni Aji Anggoro, and Amry KS Pelawi were convicted.¹² The comparison should therefore focus on the reasoning behind each outcome rather than on the verdict alone. In particular, the analysis concerns the application of the Anti-Corruption Law, the construction of unlawful conduct or abuse of authority, and the assessment of state financial loss. This approach is important because the same type of public expenditure may be assessed differently depending on how the court understands the relationship between the contracted service, payment, alleged irregularity, and resulting financial loss.

Table 1. Comparative Legal Analysis of the Karo Regency Village Videography Corruption Cases

Legal Aspect	Amsal Christy Sitepu	Jesaya Perangin Angin	Toni Aji Anggoro	Amry KS Pelawi
Judicial outcome	Acquitted	Convicted	Convicted	Convicted
Relevant legal framework	Article 3 in conjunction with Article 18 of the Anti-Corruption Law	Anti-Corruption Law	Anti-Corruption Law	Anti-Corruption Law

10 Lucia Apria and Darwis Robinson Manalu, “Toward a Secure Digital Society: The Influence of Digital Security Awareness on Students’ Personal Data Protection Behavior,” *Societa: Journal of Society and Change* 1, no. 1 (2026): 159–71, <https://perfidiajournal.com/index.php/societa/article/view/37>.

11 Fajar Dian Aryani, Pujiyono, and Sidharta, “The Judicial Policy of Ratio Decidendi Regarding Corporate Criminal Liability towards Just Judgments,” *Indonesia Law Review* 14, no. 2 (2024): 23–38, <https://doi.org/10.15742/ilrev.v14n2.2>.

12 Pengadilan Negeri Medan, “Putusan Nomor 32/Pid.Sus-Tpk/2025/PN Mdn,” 2026.

Disparities in Corruption Rulings within the Same Jurisdiction

Main issue	Unlawful conduct and state financial loss	Corruption offense and state financial loss	Corruption offense and state financial loss	Corruption offense and state financial loss
Service performance	Videography services were actually performed	Service-related expenditure examined in relation to alleged loss	Service-related expenditure examined in relation to alleged loss	Service-related expenditure examined in relation to alleged loss
State financial loss	Assessed in relation to the value and performance of the services	Assessed through the alleged financial loss associated with the expenditure	Assessed through the alleged financial loss associated with the expenditure	Assessed through the alleged financial loss associated with the expenditure
Judicial approach identified in this study	Substantive-economic	Formal-administrative	Formal-administrative	Formal-administrative
Principal analytical issue	Whether completed services and their value affected the elements of the offense	Whether expenditure and alleged loss established the offense	Whether expenditure and alleged loss established the offense	Whether expenditure and alleged loss established the offense

Source: Authors' analysis based on the relevant court decisions examined in this study.

Table 1 compares the principal legal aspects of the four cases and shows where the judicial analysis appears to diverge. The comparison indicates that the cases share a common setting involving village videography expenditure, but the treatment of service performance and state financial loss differs. In Amsal's case, the court's reasoning gave significant weight to the fact that the videography work had actually been performed and to the absence of a sufficiently established unlawful act. The other three cases resulted in convictions under separate proceedings, making their reasoning important for comparison. Table 1 therefore functions as the analytical starting point for identifying differences in this study's legal interpretation of offense elements and the evidentiary basis for establishing state financial loss.

The statutory framework is particularly important because the cases were prosecuted under the Anti-Corruption Law, including Article 3 in conjunction with Article 18 of Law No. 31 of 1999 as amended by Law No. 20 of 2001 in the Amsal case. Article 3 concerns obtaining an advantage through abuse of authority, opportunity, or means arising from a position or status that may harm state finances or the state economy.¹³ Article 18 provides additional criminal sanctions, including payment of replacement money. Accordingly, the analysis must determine whether the conduct attributed to each defendant satisfies the statutory elements and whether the alleged state financial loss is sufficiently connected to that conduct. The application of these elements becomes central to explaining why comparable service transactions may lead to different judicial conclusions.

The Amsal decision illustrates the importance of examining the substantive value of professional services when determining whether an alleged financial loss has been established. Available reporting on Decision No. 171/Pid.Sus-TPK/2025/PN Mdn states that the court acquitted

13 "Undang-Undang (UU) Nomor 31 Tahun 1999 Tentang Pemberantasan Tindak Pidana Korupsi"; "Undang-Undang (UU) Nomor 20 Tahun 2001 Tentang Perubahan Atas Undang-Undang Nomor 31 Tahun 1999 Tentang Pemberantasan Tindak Pidana Korupsi".

Amsal after finding that the prosecution had not proven the charged offense. Reporting on the court's reasoning further indicates that the absence of a standardized price benchmark for videography services was relevant to assessing the alleged loss. This differs from an approach that treats the difference between contract expenditure and an estimated benchmark as sufficient evidence of loss without examining the economic value of completed work. The distinction is legally significant because payment, pricing, and service performance must be connected to the statutory elements before a criminal conclusion can be reached.

The comparison consequently reveals that the central disparity lies in the method used to connect factual circumstances with the elements of the offense and state financial loss. A formal-administrative approach may emphasize budgetary allocation, expenditure, and alleged discrepancies, whereas a substantive-economic approach also examines whether the contracted service was delivered and possessed economic value. Consistency does not require identical verdicts across corruption cases; it requires comparable legal criteria to be applied and explained when circumstances are materially similar.¹⁴ The ratio decidendi therefore becomes the analytical bridge between statutory provisions and case-specific facts.¹⁵ In the Karo cases, clearer reasoning on service performance, valuation, and the relationship between the defendant's conduct and actual state financial loss would strengthen legal certainty and clarify differences between judgments.

Public Opinion, Legal Certainty, and Judicial Independence

Public attention surrounding corruption cases can create a broader social context for judicial decision-making. Media coverage, social media discussions, and public reactions may shape expectations about how a case should be resolved, particularly when a case receives extensive exposure. However, public attention should not be treated as direct evidence that it determines a judge's decision. Judicial independence requires judges to decide cases on the basis of law and evidence, while public opinion remains an external social factor. Farig describes public intervention as a potential challenge to judicial decision-making,¹⁶ while Harseno discusses the phenomenon of "trial by social media," in which public expectations can develop before a judgment is delivered.¹⁷ In this context, public attention is better understood as a contextual variable surrounding the judicial process rather than as a proven cause of a particular verdict.

The Amsal Christy Sitepu case received substantial public and media attention compared with the other cases examined in this study. This difference in exposure is relevant because public scrutiny can affect the social environment in which judicial proceedings take place. Nevertheless, the available normative analysis does not establish a direct causal relationship between media attention and the acquittal. The judgment must therefore remain the primary basis for explaining the court's legal conclusion. Public attention can instead be considered when examining the broader circumstances surrounding the formulation and reception of the decision.

14 Regina Anjani and Edi Setiadi, "Disparitas Putusan Tindak Pidana Korupsi Yang Dilakukan Oleh Kepala Desa (Studi Putusan Nomor 06/Pid.Sus-Tpk/2022/PN.Bdg Dan Studi Putusan Nomor 06/Pid.Sus-Tpk/2021/PN.Plg)," *Bandung Conference Series: Law Studies* 3, no. 1 (2023), <https://doi.org/10.29313/bcsls.v3i1.4917>.

15 Simon Butt, "Judicial Reasoning and Review in the Indonesian Supreme Court," *Asian Journal of Law and Society* 6, no. 1 (2019): 67–97, <https://doi.org/10.1017/als.2018.26>.

16 Muamar Azmar Mahmud Farig, "Intervensi Publik Dalam Penjatuhan Putusan Dan Upaya Mengatasinya Melalui Pendekatan Hyperrealism," *MariNews: Mahkamah Agung Republik Indonesia*, 2025, <https://marinews.mahkamahagung.go.id/artikel/intervensi-publik-dalam-penjatuhan-putusan-0ih>.

17 Iwan Harsono et al., "The Influence of Socio-Economic Factors on Marriage Patterns in Indonesia: A Quantitative Analysis of the Relationship between Social Status and Marriage Decisions," *Sciences Du Nord Humanities and Social Sciences* 1, no. 01 (February 7, 2024): 33–39, <https://doi.org/10.58812/snhss.v1i1.5>.

Prawiranegara explains that social pressure may create challenges for judicial freedom, particularly in cases that attract strong public reactions.¹⁸ Similarly, Sidiqah emphasizes the relationship between judicial independence and public opinion, showing why external expectations are relevant to discussions of judicial decision-making.¹⁹

The relationship between public opinion and judicial independence becomes particularly important when legal cases develop into highly visible public controversies. Social media can accelerate the circulation of information, interpretations, and demands for particular outcomes before the judicial process is completed. This situation creates a distinction between legal reasoning and social expectations: judges are required to rely on legally relevant evidence, while the public may evaluate a case through moral, political, or emotional considerations. Yatnih discusses the influence of social media on perceptions of criminal law enforcement and justice,²⁰ while Flora and Kadir examine the broader phenomenon of viral justice and its implications for law-enforcement independence.²¹ These perspectives help explain why public exposure should be included in the contextual analysis of the Karo cases, while avoiding the stronger and unsupported claim that public opinion directly produced the different judicial outcomes.

From the perspective of legal certainty, differences in judicial outcomes become problematic when parties in comparable cases cannot identify clear reasons for materially different conclusions. Legal certainty does not require every case to produce an identical verdict, because differences in evidence and legally relevant circumstances may justify different outcomes. What matters is whether those differences are adequately explained through transparent and rational judicial reasoning. Daulay identifies judicial discretion as an important factor in sentencing disparities in Indonesian corruption cases,²² while Suparno et al. connect corruption sentencing disparities with concerns about legal certainty and public justice.²³ In the Karo village videography cases, this principle means that differences between the acquittal and convictions should be assessed through the reasoning presented in each judgment. The stronger the explanation connecting facts, evidence, legal elements, and conclusions, the greater the basis for evaluating consistency.

Judicial independence should therefore be understood together with accountability and consistency in legal reasoning. Independence protects judges from improper external intervention, but it does not mean that judicial decisions are beyond critical examination. A judgment remains subject to legal analysis concerning its interpretation of statutory elements, assessment of evidence, and explanation of the relationship between conduct and state financial loss. Negara and Susilo emphasize the importance of judicial independence within the

18 Bima Satya Prawiranegara, "Implikasi Tekanan Masyarakat Terhadap Kebebasan Hakim Dalam Memutus Perkara: Studi Kasus Putusan Hakim Atas Richard Eliezer," *Progressive Law and Society* 2, no. 1 (2024), <https://doi.org/10.14710/pls.31244>.

19 Meliyani Sidiqah, "Independence of Judges and Public Opinion," *Sociological Jurisprudence Journal* 6, no. 2 (2023): 133–43, <https://doi.org/10.22225/scj.6.2.2023.133-143>.

20 Endah Fuzi Yatnih, "Pengaruh Media Sosial Terhadap Persepsi Dan Penegakan Hukum Pidana: Dampak Media Sosial Terhadap Opini Publik, Proses Hukum Dan Keadilan Pidana," *Equality Before the Law* 4, no. 2 (2024), <https://doi.org/10.36232/equalitybeforethelaw.v4i2.451>.

21 Henny Saida Flora and Taqyuddin Kadir, "Viral Justice: The Influence of Social Media Culture on the Independence of Law Enforcement," *Ipsa Jure* 2, no. 12 (2026): 41–51, <https://doi.org/10.62872/fk6r6q02>.

22 Ahmad Fadli Daulay, "Sentencing Disparities in Corruption Cases and Judicial Discretion in Indonesian Courts," *Jurnal Ilmu Hukum Kyadiren* 6, no. 2 (2025): 160–72, <https://doi.org/10.46924/jihk.v6i2.248>.

23 Erdhy Widyatama Suparno, Alwan Hadiananto, and Isfandir Hutasoit, "Disparitas Pemidanaan Korupsi Dalam Perspektif Kepastian Hukum Dan Keadilan Publik," *Jurnal USM Law Review* 9, no. 1 (2026): 341–60, <https://doi.org/10.26623/julr.v9i1.13356>.

framework of statutory regulation,²⁴ while Lubis et al. discuss supervision and judicial development as mechanisms for strengthening integrity within judicial institutions.²⁵ Accordingly, the issue identified in the Karo cases is not that judges should be prevented from exercising discretion. Rather, discretion should be exercised through reasoning that is sufficiently transparent, consistent, and legally accountable to permit comparison across cases without transforming public opinion into a substitute for judicial analysis.

The findings have implications for efforts to reduce unexplained disparities in corruption adjudication. Reform should not seek to eliminate judicial discretion or impose identical outcomes on cases with different evidentiary circumstances. Instead, greater methodological clarity is needed in assessing the elements of corruption offenses, particularly the relationship between unlawful conduct, expenditure, service performance, and state financial loss. Standardized reasoning frameworks may help judges explain why particular factual circumstances produce particular legal consequences while preserving the independence required for adjudication. Suparno et al. and Daulay demonstrate the continuing relevance of sentencing disparity and judicial discretion in discussions of Indonesian corruption adjudication.²⁶ Within this framework, the Karo cases illustrate the importance of developing clearer analytical guidance rather than relying on public visibility as a measure of judicial scrutiny or allowing administrative irregularities to automatically determine the existence of substantive financial loss.

CONCLUSION

This study finds that the disparity in the Karo Regency village videography corruption cases is rooted not merely in differences in verdicts, but in differences in the judicial construction of the elements of corruption and state financial loss. The comparison shows that the acquittal of Amsal Christy Sitepu was associated with judicial consideration of the actual performance and value of the videography services, while the convictions in the other cases reflected a different assessment of expenditure and alleged state loss. The disparity therefore emerges through different ways of connecting statutory provisions, evidence, service performance, and financial loss within the *ratio decidendi*. The study further finds that public and media attention provides a relevant social context for examining judicial independence, but the available normative evidence does not establish that public exposure directly caused any particular verdict. The central issue is consequently the consistency and transparency of judicial reasoning in comparable corruption cases.

This study contributes a comparative legal framework that connects *ratio decidendi*, the elements of corruption, the construction of state financial loss, legal certainty, and judicial independence in service-based corruption cases. Its contribution lies in demonstrating how differences between formal-administrative and substantive-economic approaches can help explain judicial disparities beyond the final verdicts. Nevertheless, the study is limited by its normative and qualitative design, its focus on four village videography cases in Karo Regency, and its inability to empirically establish whether public opinion influenced judicial reasoning or

24 Dharma Setiawan Negara and Erwin Susilo, "Independensi Kekuasaan Kehakiman Dalam Menjatuhkan Putusan Ditinjau Dari Perspektif Undang-Undang Sebagai Perjanjian," *Mimbar Hukum* 37, no. 1 (2025): 83–106, <https://doi.org/10.22146/mh.v37i1.18891>.

25 Andi Hakim Lubis, Junaidi Lubis, and Said Rizal, "Optimalisasi Pengawasan Dan Pembinaan Hakim Menuju Kekuasaan Kehakiman Yang Berintegritas Dan Bermartabat," *Ilmu Hukum Prima (IHP)* 5, no. 1 (2022): 12–24, <https://doi.org/10.34012/jihp.v5i1.2456>.

26 Suparno, Hadianto, and Hutasoit, "Disparitas Pemidanaan Korupsi Dalam Perspektif Kepastian Hukum Dan Keadilan Publik"; Daulay, "Sentencing Disparities in Corruption Cases and Judicial Discretion in Indonesian Courts."

outcomes. Future research should therefore examine a larger number of service-based corruption cases across different jurisdictions and systematically compare judicial reasoning concerning service performance and state financial loss. Empirical research involving judges, prosecutors, lawyers, or other relevant actors could further investigate how judicial reasoning, institutional conditions, and public scrutiny interact while maintaining the distinction between legitimate public oversight and improper external influence.

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