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The Evidentiary Value of Visum et Repertum in Establishing the Crime of Attempted Rape (An Analysis of Court Decision No. 72/Pid.B/2021/PN.Pps)

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Abstract: Evidence plays a central role in criminal law, as Article 184 of the Criminal Procedure Code establishes it as the basis for judges to determine whether the elements of a crime are proven lawfully and convincingly. In the case of attempted rape against a deaf and mute person with disabilities in Decision Number 72/Pid.B/2021/PN.Pps, the evidentiary process faced challenges due to the victim’s limited communication. This study aims to analyze the role of visum et repertum in proving the elements of attempted rape. Using a normative juridical method with a case approach, this research relies on legislation and court decisions as primary materials, supported by scholarly works. The results show that visum et repertum is written evidence with strong probative value, as it presents objective medical findings indicating physical violence, supporting the elements under Article 285 in conjunction with Article 53 paragraph (1) of the Criminal Code. In this case, visum et repertum strengthened witness testimonies and helped the judge form a conviction that acts leading to rape had occurred, despite no intercourse. It thus functions not only as formal evidence but also as protection for victims’ rights and a means to achieve substantive justice.

Keyword: Evidence, *Visum et Repertum*, Criminal Justice System.

INTRODUCTION

Evidence plays a highly crucial role in criminal law, as criminal law constitutes a branch of public law. Therefore, the process of proof must be grounded in clear facts and sound reasoning. Every judicial decision must not be based solely on assumptions or on matters that lack concrete and factual certainty (Samosir, 2018). The judge must make sure that every piece of evidence is reliable and valid during a trial. This is in line with Article 184 of the Criminal Procedure Code, which specifies that the defendant's testimony, letters or papers, expert testimony, witness testimony, and clues are all considered legitimate forms of evidence (Undang-Undang Nomor 8 Tahun 1981 Tentang Kitab Undang-Undang Hukum Acara Pidana, 1981). If the judge is not convinced that the defendant committed the crime and has at least two reliable pieces of evidence, they are not allowed to impose a sentence (Supardi, 2023).

Article 160 paragraph (1) letter b of the Criminal Procedure Code stipulates that the first statement to be examined in court is the statement from the victim who is in the position of witness. Evidence in a criminal case serves as the primary foundation of the criminal justice process, ensuring legal certainty and the realization of justice for all parties involved (Eugenia et al., 2024). The evidentiary process often encounters obstacles, particularly when the victim presented in court is a person with a disability, such as a deaf and mute individual who is unable to convey their testimony clearly (A. Malinda et al., 2014). Therefore, the existence of additional evidence such as a visum et repertum is important to support the evidentiary process in court.

The results and conclusions of a medical examination for both living and deceased victims are contained in a document called visum et repertum, which is written by a physician and used by the judge in the case examination process (S, 2023). Visum et Repertum also contains an explanation or medical opinion from the doctor regarding the results of the examination which is formulated in the conclusion section (Aflanier et al., 2017). Case examined in this study concerns the criminal offense of attempted rape and assault against a woman with a deaf-mute disability that occurred in Pulang Pisau Regency and was adjudicated before the District Court of Pulang Pisau under Decision Number 72/Pid.B/2021/PN.Pps. An attempt is an act demonstrating an effort to commit a criminal offense, the execution of which has commenced but has not been completed, or a manifested intention to commit a particular crime that has already appeared in the initial stage of its execution (Chiery et al., 2025).

This act can be classified as a violation of Article 285 of the Criminal Code in conjunction with Article 53 paragraph (1) of the Criminal Code which regulates attempted rape (Undang-Undang Nomor 1 Tahun 1946 Tentang Peraturan Hukum Pidana, 1946). In this case, the defendant raised objections to the victim's testimony. However, the existence of the *Visum et Repertum* provided objective evidence of the victim's physical injuries resulting from the alleged assault. This confirms that the visum et repertum has a crucial role in supporting the evidence process (Sidauruk & Hutabarat, 2023), particularly when the victim's testimony cannot be fully articulated due to physical limitations or communication barriers.

As a result, the visum et repertum serves as both written proof and a supporting tool to guarantee the preservation of the victim's rights and the realisation of the legal certainty concept. Based on the foregoing issues, further examination is necessary regarding the position of *Visum et Repertum* in the proof of criminal offenses, particularly in cases of attempted rape as reflected in Decision Number 72/Pid.B/2021/PN.Pps. It is anticipated that this study will increase knowledge about the function and admissibility of visum et repertum in the criminal justice system, as well as its role in guaranteeing the defence of victims' rights throughout the legal proceedings. Therefore, the author is interested in conducting a more in-depth analysis of this issue under the title "**The Legal Position Of *Visum Et Repertum* In Proving Attempted Rape (A Study of Decision Number 72/Pid.B/2021/PN.Pps)**".

METHOD

This research uses a normative juridical approach by examining the law through related laws and regulations, principles and legal principles, and is supported by library materials as secondary data sources (Waluyo, 2008). This research uses two main types of legal data sources, primary legal materials and secondary legal materials. Primary legal materials are binding sources because they originate directly from applicable laws and regulations (Muhaimin, 2020). The primary legal materials utilized in this study include Decision Number 72/Pid.B/2021/PN.Pps., the Indonesian Criminal Procedure Code (KUHP), Law Number 13 of 2006 concerning the Protection of Witnesses and Victims, Law Number 8 of 2016 concerning Persons with Disabilities, and the Indonesian Penal Code (KUHP). These four sources constitute the principal foundation for analyzing the application of criminal law and

evidentiary procedures in the case under examination. Secondary legal materials function as complementary and supporting sources in understanding, interpreting, and critically analyzing the primary legal materials (Karimuddin Abdullah et al., 2022). The secondary legal materials employed in this study include various legal literatures such as academic textbooks, scholarly journals, previous research findings, and academic works such as undergraduate theses addressing similar topics. This research uses a library research method, a data collection technique that involves searching and analyzing various literature sources related to the research topic. The sources used include scientific books, legal journals, official and academic research reports, and various other supporting literature relevant to the problem under study (Rahmadi, 2011). The data analysis technique employed in this study is case analysis of Decision Number 72/Pid.B/2021/PN.Pps., which concerns the criminal offense of attempted rape and assault against a deaf-mute person with disabilities. This research adopts a prescriptive writing approach, namely an analytical technique that focuses on providing legal arguments based on the findings of the study (Widiarty, 2019).

RESULTS AND DISCUSSION

The Relevance of *Visum et Repertum* in Proving the Elements of Attempted Rape

Visum et repertum plays a significant role in proving the elements of attempted rape, as it provides objective and independent medical evidence regarding the incident experienced by the victim. Normatively, *visum et repertum* falls within the category of documentary evidence as stipulated in Article 184 of the Indonesian Criminal Procedure Code (KUHAP). Therefore, the results of the medical examination set forth in the *visum* may be considered by the judge as one of the evidentiary sources possessing probative value (Siadari et al., 2016). According to the elements of the criminal act accused in Decision Number 72/Pid.B/2021/PN.Pps, the element of violence or the fear of violence used to coerce a woman into having sex is governed by Article 285 of the Criminal Code. Meanwhile, the provision on attempt under Article 53 of the KUHP emphasizes the existence of intent to commit a crime and the commencement of its execution, even though it has not been completed. When the case concerns attempted rape, the judge must assess whether there is evidence demonstrating both the intent and the initial acts of execution, such as acts of coercion, an incomplete attempt at penetration, or physical violence accompanying the attempt.

In this context, *visum et repertum* provides data concerning the injuries and trauma suffered by the victim, the location of the injuries, their characteristics, and medical conclusions as to whether such injuries are consistent with acts of coercion or violence (Insani et al., 2025). Such information is highly relevant in establishing that physical acts supporting the element of violence as stipulated under Article 285 of the Indonesian Penal Code (KUHP) have occurred, and in affirming the commencement of execution within the meaning of attempt under Article 53 of the KUHP. The involvement of *visum et repertum* becomes even more crucial when the victim has communication limitations, such as a deaf-mute person with disabilities. In such circumstances, the victim's verbal testimony may be incomplete, ambiguous, or difficult to comprehend without the assistance of an interpreter or specialized communication devices. Law Number 8 of 2016 concerning Persons with Disabilities requires the provision of access and protection for persons with disabilities within legal proceedings, meaning that investigators and courts are obligated to provide reasonable communication accommodations (Undang-Undang Nomor 8 Tahun 2016 Tentang Penyandang Disabilitas, 2016). However, until such accommodations function effectively, *visum et repertum* serves as an essential evidentiary instrument to ensure that the factual circumstances of the incident can still be presented before the court. In this way, the *visum* not only complements other forms of evidence but also plays a role in safeguarding the victim's right to access to justice (Panggabean, 2021).

From the perspective of victim protection, Law Number 13 of 2006 concerning the Protection of Witnesses and Victims affirms the State's obligation to provide protection and assistance to victims throughout the judicial process (Undang-Undang Nomor 13 Tahun 2006 Tentang Perlindungan Saksi Dan Korban, 2006). As an objective medical document, *visum et repertum* also functions as an instrument that helps ensure victims are not compelled to repeatedly relive their trauma when required to explain the details of their injuries extensively before the court (Pujaningrum, 2022). *Visum et Repertum* serves as a tool for comparing and bolstering other pieces of evidence, including statements from witnesses and the defendant. The presence of the *visum*, accompanied by expert testimony, increases the likelihood that the judge will attain conviction regarding the elements of violence and the commencement of the attempted act (Ladio & Madjid, 2025).

In Decision Number 72/Pid.B/2021/PN.Pps, the Panel of Judges relied upon the results of the *visum et repertum* issued by the Jabiren Community Health Center (Puskesmas Jabiren) Number 445/472/TU/JB/VII/2021 as an essential basis for assessing the fulfillment of the elements of the criminal offense. The *visum*, signed by Dr. Dea Intan Soraya, provided a detailed description of a swelling on the head, bruising on the right eyelid, injuries to the neck, the lower left abdomen, and the right wrist, all of which were medically concluded to have resulted from blunt force trauma. These medical findings constitute concrete evidence that physical violence had indeed been inflicted upon the victim. In addition to being a medical report, the post-mortem results contain information that has substantial evidentiary power in demonstrating the elements of attempted rape as defined by Article 285 of the Criminal Code in conjunction with Article 53 paragraph (1) of the Criminal Code, as stated in the decision.

In its legal reasoning, the Court stated that the defendant committed acts of violence by striking the victim, resulting in injuries as described in the *visum et repertum*. The medical findings and witness testimonies corroborated one another, thereby establishing the element of violence lawfully and convincingly. Although sexual intercourse did not occur, the defendant had carried out acts that directly led toward the commission of rape. The act remained incomplete solely due to the victim's resistance, rather than the defendant's own volition. Therefore, the element of attempt as formulated under Article 53 of the Indonesian Penal Code (KUHP) was deemed fulfilled. This interpretation demonstrates that the use of *visum et repertum* affirms the connection between medical facts and the legal act. With the presence of concrete medical evidence, the judge was able to determine that the violence committed was not merely a verbal threat or psychological pressure, but actual physical violence that had truly occurred.

In this case, the *visum et repertum* has fulfilled all formal and material requirements as regulated in Article 184 of the Criminal Procedure Code. Formally, the *visum* contained the identity of the examining physician, the date and place of examination, a detailed description of the injuries, and medical conclusions that could be examined and tested during trial proceedings. Materially, the *visum* bore direct relevance to the criminal offense charged, as the injuries identified were consistent with the acts of violence committed by the defendant. During the trial, the testimony of the examining physician explaining the *visum* provided the judge with medical insight regarding the causal relationship between the defendant's conduct and the victim's injuries. Thus, the *visum et repertum* not only acts as written evidence, but also has evidentiary value such as expert testimony that bridges medical knowledge and legal assessment.

Based on the foregoing considerations, it may be concluded that the relevance of *visum et repertum* in proving the elements of attempted rape in Decision Number 72/Pid.B/2021/PN.Pps lies in ensuring the fulfillment of the elements of rape as stipulated under Article 285 of the Indonesian Penal Code (KUHP), the elements of assault as regulated under Article 351 of the KUHP, and the element of attempt as provided in Article 53 paragraph

(1) of the KUHP. Accordingly, *visum et repertum* can be said to contribute to the realization of substantive justice and to guarantee the victim's right to equal treatment before the law.

The Legal Position of *Visum et Repertum* in Proving Attempted Rape

The examination of criminal cases in the judicial process aims to trace relevant facts and obtain a complete understanding of the truth of a criminal event. All such stages are grounded in the provisions of Law Number 8 of 1981 concerning the Indonesian Criminal Procedure Code (KUHAP), guided by the principles of honesty and timeliness, in order to determine who is responsible for the criminal offense (Batian et al., 2024). In the Indonesian legal system, Article 184 of the Criminal Procedure Code stipulates that a person can only be found guilty if supported by at least two valid pieces of evidence. Such evidence must be sufficiently strong to establish the judge's conviction regarding the occurrence of the criminal offense and the defendant's involvement therein (Bakhtiar, 2022). The term *bewijskracht* in Dutch is used to denote the evidentiary strength of a particular piece of evidence. In judicial practice, the determination of the weight of such evidentiary value is not rigidly prescribed; rather, it depends on the legal reasoning and assessment of the judge in relation to the case under examination (Satria, 2022).

Visum et Repertum is a written report made by a doctor at the request of an investigator or court, which contains the results of the examination and findings directly observed on the victim's body or the object being examined. This statement is made based on the physician's professional expertise and oath, and is intended to serve as a basis for consideration in judicial proceedings (Pemasela et al., 2015). The use of post-mortem examinations (*visum et repertum*) in Indonesia still faces several obstacles, including low public understanding and awareness of their importance, limited medical and forensic facilities in some areas, and a lack of trained medical and forensic personnel, all of which hinder the professional conduct of examinations. Furthermore, suboptimal management of post-mortem examination evidence has the potential to result in the loss or destruction of evidence needed in court (Ningrum & Sukma, 2024).

Visum et repertum assists in complementing witness testimony in proving criminal violence, as it provides objective physical data that cannot be obtained through testimony alone (Sukrisno & Triadi, 2025). *Visum et repertum* as written evidence has an important position in proving because it contains formal medical findings, what is observed and found by the doctor is officially recorded and under certain conditions can function as a substitute for physical evidence. The results of the *visum* not only reinforce the victim's account but may also refute allegations in the event of inconsistencies, thereby providing the judge with a basis to conduct a fair and objective assessment (Winardi & Wahyuni, 2015).

In the case decided by the District Court of Pulang Pisau under Number 72/Pid.B/2021/PN.Pps, *visum et repertum* functioned as a source of medical evidence that systematically described the victims physical condition, thereby serving as a point of comparison with the victim's testimony. The decision itself positioned the medical findings contained in the *visum et repertum* as one of the material bases for assessing the fulfillment of the element of violence leading to attempted rape. In its reasoning, the court correlated the description of injuries recorded in the *visum et repertum* with other facts revealed during trial to establish judicial conviction regarding the existence of coercive acts, even though sexual intercourse did not ultimately occur.

The position of *visum et repertum* becomes increasingly significant given the victim's communication limitations, which may prevent oral testimony from fully explaining the technical aspects of the injuries, the mechanism of injury, or the chronology of events. The presence of a *visum et repertum* can therefore assist the victim when they encounter difficulties in providing explanations due to communication barriers. However, *visum et repertum* cannot function optimally if the applicable regulations and standards governing medical examinations

remain inadequate (Heryani & Sugiarti, 2025). The effectiveness of *visum et repertum* is largely determined by the standards of examination and the competence of the examining physician (D. S. Malinda, 2025). If the *visum et repertum* is prepared by an inexperienced medical practitioner, or if the examination is conducted hastily without relevant supporting examinations, its contents risk failing to accurately reflect the causal relationship between the act and the injuries sustained (Afandi, 2017). Therefore, there is an urgent need to strengthen technical regulations, formulate national guidelines for the drafting of *visum et repertum*, and enhance the capacity of examining physicians through forensic training. In many regions, there remains a shortage of forensic resources and a lack of procedural harmonization between healthcare institutions and law enforcement authorities, resulting in *visum* reports that are sometimes not optimally utilized as material evidence in court. The reinforcement of guidelines and procedural harmonization aims to ensure that *visum et repertum* fulfills both formal requirements and material relevance, thereby stabilizing and strengthening its position as reliable evidence in the evidentiary process.

The position of *visum et repertum* in proving attempted rape is both instrumental and contextual. It is instrumental because it presents objective and verifiable medical data. It is contextual because its evidentiary weight largely depends on its formal and material conformity, as well as on the support of other evidence presented during trial. For victims with disabilities, *visum et repertum* is not merely an administrative document, but an instrument that contributes to the fulfillment of the right to access justice as mandated by Law Number 8 of 2016 concerning Persons with Disabilities. Decision No. 72/Pid.B/2021/PN.Pps illustrates a situation in which *visum et repertum*, when properly considered, serves as a bridge between medical facts and legal assessment, thereby assisting in the realization of justice for the victim.

CONCLUSION

Visum et Repertum plays a crucial role in proving the element of attempted rape, particularly in Decision Number 72/Pid.B/2021/PN.Pps. A *Visum* is considered documentary evidence as stipulated in Article 184 of the Criminal Procedure Code, but in practice, it also serves to approximate expert testimony by explaining the causal relationship between the act and the injuries suffered by the victim. The relevance of the *Visum* in this decision helps prove physical violence as part of the act leading to rape, even if it did not occur. The medical findings in the *Visum*, supported by witness testimony and trial evidence, strengthen the judge's belief that the elements of violence and attempted rape have been met. The *Visum et Repertum* also helps victims with communication limitations, as it presents objective facts that do not rely entirely on the victim's verbal abilities. Thus, the *Visum et Repertum* not only acts as a formal evidence, but also as an instrument for protecting the victim's rights and a means of bridging medical facts with legal judgment. Therefore, the existence of a medical examination that meets formal and material requirements can strengthen the evidence and support the realization of a fair trial process.

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