

Criminal Liability in Premeditated Murder Cases Through The Michat Application

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Abstract.

The development of information technology has had a significant impact on various aspects of life, including the modus operandi of criminal acts. This article discusses criminal liability in a case of premeditated murder mediated by the MICHAT friendship application. The case study focuses on the Bengkalis District Court Decision Number 186/Pid.B/2025/PN Bis, which sentenced defendant Arif Indra Lexmana Shiombing to 13 years in prison. This research uses a normative juridical method with a case study approach. The results show that the elements of intent and planning (dolus et premeditatio) in Article 340 of the Criminal Code are legally and convincingly proven, even though the initial motive was not to kill, but rather as a form of revenge for the fraud experienced by the defendant. These findings underscore the importance of adaptive law enforcement to technological developments, as well as the need for sociological and psychological considerations in sentencing.

Keywords: Criminal Liability; Premeditated Murder; MICHAT Application; Article 340 of the Criminal Code; Technology and Law.

I. INTRODUCTION

Premeditated murder (Article 340 of the Criminal Code) is a crime punishable by severe penalties, as it emphasizes deliberate, carefully calculated intent (voorbedachte rade). In today's context, "premeditation" no longer occurs only in physical meetings, but can also occur through digital communication. Instant messaging apps like MiChat, popular for their chat and communication features, can actually be used as tools for planning crimes. The Belopa District Court's decision No. 186/PID.B/2025/PN BLS sets an important precedent that highlights this new modus operandi. This article aims to outline the criminal liability of perpetrators based on this decision and its implications for law enforcement in the digital age. The development of digital technology has changed patterns of social interaction, including criminal practices. Social networking apps like MICHAT are not only used to build social relationships, but also as a means of committing crimes, including murder. The Bengkalis District Court Decision Number 186/Pid.B/2025/PN Bis sets an important precedent in handling criminal cases involving digital platforms. This study aims to analyze criminal liability in cases of premeditated murder committed through the MICHAT application, with a focus on the application of Article 340 of the Criminal Code and the judge's considerations in sentencing. The development of digital technology has opened up new space for criminals to commit various crimes with increasingly complex modus operandi. One example is the use of social networking apps like MiChat, which are often misused to trap victims. Crimes that originate from virtual interactions are highly vulnerable because perpetrators can conceal their identities, manipulate victims, and systematically plan their crimes.

The premeditated murder case involving the MiChat app, decided in Decision Number 186/Pid.B/2025/PN Bls, serves as a concrete example of how technology can play a significant role in crime. This case illustrates that digital tools are used not only for communication but also as a medium for planning and executing murder. This research is significant because little literature focuses on analyzing the technology of the social media app as an instrument in the crime of premeditated murder. Therefore, this research is expected to contribute to the development of criminal law, particularly in the context of accountability for perpetrators who utilize digital technology. The defendant, Arif Indra Lexmana

Sihombing, used the Michat app to communicate with the victim, Wiji Imelda. The communication began with negotiations to have sexual intercourse for a fee. The defendant purchased sleeping pills and used the Michat app and WhatsApp to arrange a meeting at a boarding house in Bengkalis. After the victim arrived, the defendant mixed the sleeping pills with the victim's food and drink, then committed premeditated murder by slashing the victim's throat with a box cutter. The defendant also took the victim's belongings after the incident and left the scene. The panel of judges found the defendant committed premeditated murder with careful planning, as evidenced by digital communications via the Michat app and the preparation of the tools and drugs used to kill the victim. Chat evidence from the Michat app was crucial in proving the perpetrator's intent and planning. The defendant was found guilty of violating Article 340 of the Criminal Code and sentenced to 19 years in prison minus the time already served.

II. METHODS

This research uses a normative juridical method with a case study approach to the Bengkalis District Court Decision Number 186/Pid.B/2025/PN Bis. Data were analyzed qualitatively by examining the elements of the offense, evidence, and legal and non-legal considerations in the decision. Secondary Legal Materials: criminal law literature, scientific journals, expert commentary, and law books related to criminal liability.

III. RESULTS AND DISCUSSION

1. Case Reconstruction Based on Court Decisions

The verdict detailed that the defendant used the MiChat app by creating a new account to find nearby users, then finding the victim's account and agreeing to a meeting. Afterward, the defendant:

- Bought a cutter knife at the photocopy shop with witness Yulli Plantika Sari,
- Buy sleeping pills to mix into the victim's food and drink,
- Renting a boarding room No. 105 at CNR Pharmacy,
- Mixing sleeping pills into rice packets and drinking water bottles,
- Hide the cutter knife behind the dorm room TV.

The victim then entered the room, consumed food and drinks that had been mixed with drugs, then the defendant committed physical violence, gagged the victim, strangled her, and slashed her neck twice using a cutter knife until the victim died. The defendant then took the victim's cellphone and Rp. 70,000 in cash and then ran away. Defendant ARIF INDRA LEXMANA SHIOMBING (20 years old) committed the murder of WIJI IMELDA on December 7, 2024, in a CNR boarding room, Selatpanjang. The victim and the defendant met through the MICHAT application, where they agreed to meet in exchange for material benefits. The defendant planned the murder by purchasing a cutter knife and sleeping pills, which were mixed into the victim's food and drink. After the victim lost consciousness, the defendant took the victim's bag and cellphone, then slashed the victim's neck until she died.

2. Elements of Criminal Responsibility

The panel of judges sentenced him based on Article 340 of the Criminal Code concerning premeditated murder, with the following elements:

1. The element "Whoever": The defendant is a legal subject who is capable of being responsible.
2. The element of "Intentionally and Planned":
3. The defendant bought a cutter knife and sleeping pills before the incident.
4. The defendant hid the knife behind the TV.
5. The defendant cut the victim's neck twice until the victim died.

The panel of judges concluded that although the initial motive was revenge for fraud, the defendant had acted with full awareness (dolus eventualis) that his actions could result in death.

3. Evidence and Witness Statements

The evidence submitted includes:

1. 23 pieces of evidence (including a cutter knife, cell phone, blood-stained clothes).
2. Statements of 8 witnesses.
3. Visum et Repertum and autopsy results.
4. CCTV footage and boarding house guest book.

All the evidence strengthens the fact that the defendant had planned and carried out the murder.

4. Judge's Considerations

The judge considered:

1. **Aggravating Factors:** The defendant's actions disturbed the public and resulted in death.

2. **Mitigating Factors:**

- The defendant regretted it.
- Never been convicted.
- There were peace efforts by the defendant's family.

From the 19-year sentence, the judge sentenced him to 13 years, taking into account aspects of justice and legal certainty. This case emphasizes the importance of adapting the justice system to deal with crimes that utilize digital technology. Law enforcement against premeditated murders involving communication apps must consider the authentication and validity of digital evidence. The ability of law enforcement officers to process and present digital evidence is a crucial factor in achieving justice. The use of the Michat application as a communication medium in this case provides accurate digital evidence regarding the intention and planning of the murder. This demonstrates that digital technology can strengthen evidence in court in premeditated murder cases. Furthermore, the defendant's chat records and digital activity also prove his direct involvement and deliberate planning.

IV. CONCLUSION

Based on Bengkalis District Court Decision No. 186/Pid.B/2025/PN Bis, criminal liability in the premeditated murder case via the MICHAT app meets the elements of Article 340 of the Indonesian Criminal Code. The 13-year sentence reflects a balance between legal certainty, justice, and humanitarian aspects. Preventive efforts through education and regulation of digital platforms are needed to prevent the misuse of technology in criminal acts. The judge correctly applied criminal liability based on valid evidence, including electronic evidence. This ruling emphasizes that technological advances, while beneficial, can also be used as instruments of crime, necessitating increased digital literacy and vigilance from the public and law enforcement.

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