

Judicial Considerations of the Kota Bharu High Court of Malaysia in Acquitting an Indonesian Migrant Worker's Death Penalty

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Track: ABSTRACT

Received:	Purpose of the study: This paper aims to provide an in-depth analysis of the judges' considerations in case number HC-42KB-7-04/2014 at the High Court of Kota Bharu, Malaysia. This paper specifically aims to explore the philosophical, historical, psychological, and sociological aspects that influenced the decision to release an Indonesian migrant worker from a death penalty charge. The considerations of Malaysian judges were guided by the applicable law, facts of the case, principles of justice, legal precedents; social considerations and due process of law. Methodology: This was socio-legal research with a comparative legal approach that examined how the law functions and is applied in society, taking into account the social, cultural and economic contexts that influence it. Results: The analysis of the judges' reasoning in Wilfrida Soik's case (HC-42KB-7-04/2014) by the Kota Bharu High Court highlights the importance of a holistic approach to law enforcement. The court emphasized substantive justice by integrating written law with the human condition, particularly the mental state of the accused. This decision reflects the influence of the diplomatic relations between Indonesia and Malaysia, respect for sovereignty, and international conventions. Psychologically, the defendant's mental state was
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disturbed, showcasing the justice system's attention to individual well-being. Sociologically, the judgment underscored the interplay of social and cultural factors, promoting rehabilitation alongside punishment. This multidimensional approach reinforces fairness and social justice in legal decisions.

Applications of this study: The results of this research may inspire judicial institutions to make decisions based on considerations of inconsistency of evidence; lack of murderous intent; humanitarian consideration; criminal policy; and parole consideration. This is because many factors must be considered when making a decision, especially in the case of a death row.

Novelty/Originality of this study: The analysis of Wilfrida Soik's case underscores a holistic approach to law enforcement, emphasizing substantive justice, mental health, and sociocultural factors. This novel research reveals how these considerations led to the decision to spare the accused from the death penalty, highlighting fairness and social justice.

Keywords: *Judicial considerations, Indonesian migrant workers, death penalty.*

ABSTRAK

Tujuan penelitian: Makalah ini bertujuan untuk memberikan analisis mendalam tentang pertimbangan hakim dalam perkara nomor HC-42KB-7-04/2014 di Pengadilan Tinggi Kota Bharu, Malaysia. Makalah ini secara khusus bertujuan untuk mengeksplorasi aspek filosofis, historis, psikologis, dan sosiologis yang memengaruhi keputusan untuk membebaskan seorang pekerja migran Indonesia dari dakwaan hukuman mati. Pertimbangan hakim Malaysia dipandu oleh hukum yang berlaku, fakta-fakta kasus, prinsip-prinsip keadilan, preseden hukum; pertimbangan sosial dan proses hukum yang wajar.

Metodologi: Penelitian ini merupakan penelitian sosio-hukum dengan pendekatan hukum komparatif yang mengkaji bagaimana hukum berfungsi dan diterapkan dalam masyarakat, dengan mempertimbangkan konteks sosial, budaya, dan ekonomi yang memengaruhinya.

Hasil: Analisis penalaran hakim dalam perkara Wilfrida Soik (HC-42KB-7-04/2014) oleh Pengadilan Tinggi Kota Bharu menyoroti pentingnya pendekatan holistik terhadap penegakan hukum. Pengadilan menekankan keadilan substantif dengan memadukan hukum tertulis dengan kondisi manusia, khususnya kondisi mental terdakwa. Putusan ini mencerminkan pengaruh hubungan diplomatik antara Indonesia dan Malaysia, penghormatan terhadap kedaulatan, dan konvensi internasional. Secara psikologis, kondisi mental terdakwa terganggu, yang menunjukkan perhatian sistem peradilan terhadap kesejahteraan individu. Secara sosiologis, putusan tersebut menggarisbawahi interaksi faktor sosial dan budaya, yang mendorong rehabilitasi di

sampling hukuman. Pendekatan multidimensi ini memperkuat keadilan dan keadilan sosial dalam keputusan hukum.

Aplikasi penelitian ini: Hasil penelitian ini dapat menginspirasi lembaga peradilan untuk membuat keputusan berdasarkan pertimbangan ketidakkonsistenan bukti; kurangnya niat membunuh; pertimbangan kemanusiaan; kebijakan kriminal; dan pertimbangan pembebasan bersyarat. Hal ini karena banyak faktor yang harus dipertimbangkan saat membuat keputusan, terutama dalam kasus hukuman mati.

Kebaruan/Keaslian penelitian ini: Analisis kasus Wilfrida Soik menggarisbawahi pendekatan holistik terhadap penegakan hukum, yang menekankan keadilan substantif, kesehatan mental, dan faktor sosial budaya. Penelitian baru ini mengungkap bagaimana pertimbangan-pertimbangan tersebut berujung pada keputusan untuk membebaskan terdakwa dari hukuman mati, dengan menonjolkan keadilan dan keadilan sosial.

Kata kunci: Pertimbangan hukum, pekerja migran Indonesia, hukuman mati.

INTRODUCTION

A Malaysian judge's considerations in passing judgment are usually based on various legal factors and facts of the case. Some considerations of Malaysian judges include: *First*, applicable law. The judge will consider the relevant laws and regulations in determining the decision. This includes the Malaysian constitution, national legislation, and legal precedents (Lattan, 2014).

Second, the facts of the case. The judge will scrutinize all the evidence presented in court to understand the events that occurred and their context. This could include physical evidence, witness testimonies, and documentation (Adilya, 2018).

Third, the principle of fairness. The judge will endeavor to ensure that his or her decision is fair to all parties involved in the case (Prasetyo, Supriyanto, & Saleh, 2022). This involves ensuring that each party has an equal opportunity to present their arguments. This is so that the decision reflects objective fairness (Nugroho, 2019).

Fourth, legal precedent. Judges will also consider previous rulings in similar cases to assist in guiding their decisions. This principle is known as the law of precedent, where previous decisions form the basis for new decisions.

Fifth, social and moral considerations. Judges may consider social and moral values in making legal decisions, especially if the case involves sensitive or controversial issues (Suparno, 2019).

Sixth, due process. The judge will ensure that due process is followed in the case, including the rights of individuals guaranteed by law (Sunaryo & Purnamawati, 2019). Judicial considerations depend on the case and the relevant legal principles. However, these principles usually form the foundation for legal decisions taken in Malaysia.

The principles that form the basis of judicial considerations, such as legal precedents; social and moral values; and adherence to the legal process; show the importance of justice in every decision, including in death penalty cases. This is relevant to the research of Kabalmay (2019) which analyzed “The Government’s Role in Protecting Indonesian Migrant Workers Sentenced to Death in Saudi Arabia in 2018.” The results of the study explain that the legal protection of Indonesian migrant workers in Saudi Arabia focuses on the fairness of the legal process without taking over the responsibility of Indonesian migrant workers. The methods in handling different cases vary according to the category of punishment (Ta'zir, Qishash, Hadd Ghillah). Notification of execution is often given after the execution due to the absence of a Mandatory Consular Notification agreement.

Furthermore, Pramastuti et al. (2023) studied “Bilateral Relations Between Indonesia and Saudi Arabia After the Death Penalty for Tuti Tursilawati, an Indonesian Migrant Worker”. The results of the study explained that Tuti Tursilawati's death sentence had an impact on politics, while Indonesia-Saudi Arabia's diplomatic relations were improved after the case.

Another previous research was conducted by Araf et al. which studied, “The Evaluation of the Capital Punishment Practice during Jokowi’s Era of Governance (2014–2019).” Results of this research explained that during President Jokowi’s rule (2014–2019), there was a steep increase in the practice of capital punishment with 18 executions of drug cases and 221 new death penalty verdicts based on the “drug emergency” status (Araf et al., 2020).

Thus, the similarity between this current research and previous studies is that the current study focused on the legal protection for Indonesian migrant workers facing capital punishment. Meanwhile, the difference is that this research provides a different and more profound perspective on the courtly processes in other countries.

This research analyzes judicial consideration in the case of Wilfrida Soik who committed murder against her employer, Yeap Seok Pen, in Malaysia. Wilfrida claimed that

the murder case was a form of self-defense from the violence she experienced during her work. Wilfrida was arrested by the Malaysian Police Force as she was deemed to have violated Article 302 of the Malaysian Penal Code (*Kanun Keseksaan*), Judgment No. HC-42KB-7-04/2014. The Malaysian Law, Act 574, Article 302 states that anyone who commits murder will be subject to the death penalty. Malaysia's Kota Bharu High Court charged Wilfrida Soik with the death penalty for murder.

On September 30th, 2013, the sentencing hearing was held in Malaysia and Indonesia filed a request for an appeal hearing. Ultimately, the decision to hear the appeal was accepted by the High Court and the sentence was suspended to review the evidence. This appeal hearing was conducted on the basis of several defenses such as Wilfrida's condition was still underage with evidence of bone and tooth tests. Evidence in the form of psychological tests shows that the murder Wilfrida committed was a form of self-defense for the violence she endured. Wilfrida was a victim of the Indonesian labor service provider who sent her to Malaysia.

The research problem centers on an in-depth analysis of the judges' considerations in case number HC-42KB-7-04/2014 at the High Court of Kota Bharu, Malaysia. This paper specifically aims to explore the philosophical, historical, psychological, and sociological aspects that influenced the decision to release an Indonesian migrant worker from a death penalty charge.

RESEARCH METHOD

This research employed a socio-legal method with a comparative law approach. It examined how the law operates and is applied in society, focusing on the social, cultural, and economic contexts that shape and influence it. This method not only analyzed legal norms as written rules but also explored their practical application, public perceptions, and the reciprocal influence between law and social behavior. To analyze the Wilfrida Soik case at the Kota Bharu High Court, Malaysia, this approach integrated a study of legal provisions with a comparative analysis of social realities and community responses.

This method aimed to understand how the law is applied in real social contexts and how social, cultural and psychological factors influence the judicial process. In this case, the philosophical approach highlighted the importance of substantive justice, where legal decisions are not only based on the written legal text. However, they must also consider human factors,

such as the defendant's mental state (Tahir et al., 2023). The historical approach looked at the context of legal relations between Indonesia and Malaysia, as well as the influence of international treaties and diplomatic practices in the judge's decision, particularly regarding Wilfrida Soik's release from death row. The psychological approach emphasized the importance of taking the defendant's mental state into account as a crucial element in the legal assessment. This reflects that the judicial process should not only assess the legal act but also the psychological state of the individual during that act. Meanwhile, the sociological approach highlighted the defendant's social and cultural background, including how her economic conditions and age influenced her behavior and how the legal system interacted with broader social norms. The overall analysis showed that the juridical-sociological approach allowed for a more comprehensive understanding of the judicial process by considering the various aspects that influence legal decisions, resulting in a more just and humane verdict.

RESULTS & DISCUSSION

Judicial Considerations in Acquittal Decisions: A Case Study of Wilfrida Soik and the Malaysian Legal Framework

The acquittal of a death sentence is a highly serious decision and requires careful consideration by Malaysian judges. Prior to creating such decisions, judges consider several aspects, including: (1) The facts of the case: Judges need to consider all the facts and evidence revealed during the trial. This includes consideration of the degree of involvement and guilt committed by the defendant, (2) Death penalty objections: Judges must review whether there are any grounds or objections raised by the defendant or his/her counsel to the imposition of the death penalty (Nola, 2016), (3) Legal considerations: Judges should examine relevant law and other legal considerations, including whether there is a legal or policy basis supporting a sentence reduction (Suwarno, Wiloso, & Therik, 2018), (4) Mitigating factors: Judges may also consider mitigating factors that might influence the decision, such as the defendant's personality, social background, or special circumstances related to the case (Handayani, 2016), (5) Humanitarian considerations: Judges may consider humanitarian aspects in giving a sentence, including whether the death penalty is considered a punishment that is proportionate to the wrongdoing (Pangaila, 2016), (6) Policy considerations: Judges may also consider legal policies relating to the death penalty, including whether there has been a change in society's or government's views towards the punishment (Putra, 2017), and (7) Previous sentences: Judges may also consider previous verdicts in similar cases or cases that have similar factors. After

considering all these factors, judges will make a decision that they consider to be most aligned with justice and the applicable law in the case.

In the Wilfrida Soik case, the judge's consideration was first carried out through investigation. An explanation of the Wilfrida Soik case before the trial, during the trial, and after the trial is shown in Table 1.

Table 1. Description of the Wilfrida Soik Case Before, During, and After the Trial

Period	Description
Before the Trial	<p>The investigation of Wilfrida Soik's case was conducted through the stages of. To police investigation; arrest and detention; evidence collection; forensic examination; further investigation; submission of charges; trial; verdict; appeal; and sentencing. These stages ensure the completeness of evidence and information required for the trial. They also aim to clarify unclear points in the case to assist judges in profoundly understanding the case's situation and facts. Prior to the trial in Malaysia, judges need to undertake several important considerations to ensure that the judicial process takes place fairly and in accordance with the law. Some of the considerations made are listed below:</p> <ul style="list-style-type: none"> - Case Understanding: Judges are familiar with the facts of the case, including the evidence presented by both sides. Criminal law in Malaysia is primarily based on written statutes and general principles of criminal law. In the case of Wilfrida Soik, the criminal law basis in Malaysia is: <ul style="list-style-type: none"> ➤ Kanun Keseksaan: The <i>Kanun Keseksaan</i> is the primary criminal law in Malaysia. It covers a wide range of criminal acts that include murder, theft, fraud, and more. The <i>Kanun Keseksaan</i> regulates the elements of a crime, the punishment given to the offender, as well as the legal procedures associated with the criminal case (Amalia, Hafida, & Siregar, 2021). ➤ Specialized Laws: Apart from the <i>Kanun Keseksaan</i>, there are also special laws that regulate certain criminal acts or certain categories of crimes. Examples include the Hazardous Drug Act which deals with narcotics, the Domestic Violence Act, and so on (Okta, 2021). ➤ Sharia Law: In some parts of Malaysia, especially in states where the sharia law is practiced, the penal code also includes sharia law which governs behavior deemed to violate Islamic principles (Sa'adah, 2018). ➤ Legal Precedent: Previous court decisions also form the basis of the criminal law in Malaysia. The High Court and Court of Appeal regularly make decisions that interpret criminal laws and provide guidance on how those laws should be applied in new cases.

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- **International Conventions:** Malaysia may also be bound by international conventions that affect criminal law, such as the Convention on Human Rights or the UN Convention against Corruption. Countries usually implement these provisions into their domestic laws.
 - **Understanding the Law:** Judges must understand the applicable law in the case, including relevant statutes, regulations, and legal precedents. Judges need to understand the case to achieve true justice (Pakpahan, Manullang, & Nainggolan, 2019). This involves a deep understanding of the facts involved in the case; identifying and understanding the arguments from both sides (Zuhrah, 2023); and fairly and consistently applying the relevant law. A good understanding of the case allows judges to make the right decision based on law and justice, which can affect the lives of individuals and society as a whole (Suparnyo, 2019). By thoroughly understanding the case, judges can ensure that the rights of each individual are respected and that the decision is the result of a fair and just process (Yunanto, 2019). Section 302 in Malaysia's *Kanun Keseksaan* deals with murder. This is one of the most important articles in the Malaysian penal code and provides the punishment for the offense of murder (Hafid, 2015). It defines murder as an act committed with intent to kill a person. Murder is a serious crime and is punishable by death or life imprisonment, subject to the decision of the court. Section 302 provides penalties for those who intentionally commit an act to kill a person.
 - **Court Considerations:** The court has the power to consider various factors in determining the appropriate sentence, including the actual circumstances of the case and the circumstances of the perpetrator (Suwarno et al., 2018).
 - **Acquittal:** The court also has the power to acquit or reduce the sentence depending on certain circumstances, such as readjustment or rehabilitation of the offender (Azhari, 2018). Section 302 is an integral part of the Malaysian penal code and aims to provide strict sanctions against the act of murder. The law enforcement against murder cases is based on the provisions contained in this section including legal research, determination of procedure; ethical considerations; safety and order; examination of documents.

These considerations help judges ensure that the trial is conducted in a fair and transparent manner that is in accordance with the principles of Malaysian law.

During the Trial

Judicial considerations during the trial are described below:

- **Hearing of Evidence:** Judges must ensure that the evidence presented by both parties is carefully and fairly heard. This involves assessing the validity and relevance of the evidence (Artana, Dewi, & Widyantara, 2021; Rizky & Romadhona, 2022). The hearing of evidence is one of the important stages in the judicial process in Malaysia, where judges have to pay attention to and evaluate the evidence presented by both parties to support their arguments (Risdiana & Taqiuddin, 2021). Some factors that judges consider during the hearing of evidence in Malaysian courts are validity and relevance; conformity with the law; credibility of

witnesses; influence of emotions and prejudice; rights of the accused; and accurate trial record. Important points in this process are:

The first point is **witness partiality**. The High Court assessed that some witnesses had clear partiality, both to the defendant and the complainant. This could be seen in the way they gave testimony and the details they remembered. This favoritism was considered in assessing the credibility and reliability of their testimony (Hendri, Agus, & Sinaga, 2021).

The second point is **consistency of testimony**. The Court of Appeal looked at the consistency of the witnesses' testimony, both in the examination at the Lower Court level and at the appeal level. Consistent and detailed testimony is considered more credible than changing or unclear testimony.

The third point is the **ability to remember**: The High Court also assessed the witnesses' ability to remember details of the incident. A witness who was able to clearly remember the incident's details was considered more credible than a witness who could not remember important details.

The fourth point is the **existence of supporting evidence**: The High Court considers the compatibility of witness testimony with other evidence submitted, such as documents or photographs. Witness testimony that is supported by other evidence is considered stronger than testimony that has no supporting evidence (Herman et al., 2023).

In the judicial process, the evidentiary process is a very important stage to be carried out (Jayadi, 2023). It is not possible for judges to determine a verdict to the defendant without an evidentiary process. Broadly speaking, witnesses are divided into two, namely witnesses who incriminate the defendant (a charge) and witnesses who alleviate the defendant (a de charge).

This research focuses on the victim witness examination (a charge). In the ideal evidentiary phase of the trial, the victim witness is present when previously summoned by the public prosecutor after obtaining permission from the panel of judges (Wijaya, Mangku, & Hartono, 2022). In this case, the witnesses brought in by the officers to appear in court included Wilfrida's biological mother, Maria Kolo, who stated that Walfrida was not guilty of murder on the basis that she was mentally disturbed. After considering all of the above factors, the Kota Bharu High Court decided to accept or reject the witnesses' testimonies based on their credibility and reliability. This decision then became one of the bases in determining the final verdict of the case.

In addition to the witnesses' explanations, the Kota Bharu High Court also considered various other factors in making its decision, such as: the charges presented by the public prosecutor; the defenses presented by the accused; the evidence presented by both parties; as well as the applicable rule of law.

After the Trial	<p>The decision of the Kota Bharu High Court is final and inviolable.</p> <p>The judge's consideration after the hearing is to investigate possible legal violations that were not revealed during the trial, to ensure that the decision made has been properly executed. Judges are authorized to use a variety of methods in conducting investigations (Loway, Koesoemo, & Bawole, 2022). This includes requesting testimony from witnesses; examining documents and physical evidence; inspecting the scene of the incident; and appointing experts to provide opinions. Investigations conducted by judges must be objective and impartial (Januartha, Suwitra, & Ujianti, 2023). Judges must consider all available evidence and information before making a decision.</p>
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In this case, the Kota Bharu High Court judges' consideration was the diplomatic relations between Indonesia and Malaysia. Aspects related to diplomatic relations are: (1) The Reciprocal Principle. In relations between countries, there is a reciprocal principle which means that mutual respect and appreciation of the laws and sovereignty of each country is enforced. This principle also applies in terms of law enforcement, including in cases involving foreign countries (Hestaria, Hartono, & Setianto, 2022); (2) Extradition Efforts: Extradition is the process of returning a person wanted by one country from another country. The extradition process is regulated by a bilateral treaty between two countries (Nazmi & Hayati, 2023); (3) Indonesia-Malaysia Extradition Treaty: Indonesia and Malaysia have an extradition treaty signed in 1974. This treaty regulates the mechanism of returning people who are wanted for criminal offenses that occurred in the territory of one of the countries (Wulandari, 2019).

In the aspect of judicial considerations, in deciding this case, Kota Bharu High Court Judges considered diplomatic relations and the extradition treaty between Indonesia and Malaysia. Judges wanted to ensure that the legal process carried out was in accordance with the principle of reciprocity and did not interfere with the good relations between the two countries. Diplomatic relations and the extradition treaty between Indonesia and Malaysia were among the factors considered by Kota Bharu High Court judges in making this decision. The decision is expected to maintain good relations between the two countries and ensure a fair legal process for all parties.

Holistic Analysis of Judicial Considerations in the Acquittal Decision

From the conducted court processes, the judge at the Kota Bharu High Court, Malaysia, decided to acquit defendant Wilfrida Soik who had previously been charged with the death penalty. This decision was based on the following considerations: (1) Inconsistency of

Evidence. The judge considered that the evidence presented by the prosecution was not strong enough to prove the guilt of the accused beyond a reasonable doubt. This may be due to inconsistent testimonies, insufficient evidence, or other weaknesses in the case presented; (2) Lack of Intent to Kill. If the defendant is accused of committing an act that causes the death of a person, the judge may consider whether or not there is a lack of clear intent to kill. If there is doubt about the intent, the judge may decide to acquit the defendant; (3) Humanitarian Considerations: Although the criminal law recognizes the guilt committed by the defendant, judges may consider humanitarian factors, such as the defendant's age, personal or social background, or mental or physical health condition, which may influence the decision to exempt him or her from the death penalty; (4) Criminal Policy: Judges may also consider criminal policies relating to the death penalty or law enforcement in place at the time the case is decided. It is possible that the decision reflects a change in societal or governmental views towards the death penalty; and (5) Parole Considerations: Judges may also consider whether the accused may be eligible for parole, which is an alternative to the death penalty in the Malaysian justice system. These considerations can assist the judge in making an appropriate and fair decision based on the law and the facts of the case.

Judicial considerations of the Wilfrida Soik case can be analyzed using several aspects. Philosophical, historical, psychological and sociological analyses of judicial considerations in case number HC-42KB-7-04/2014 in the Case of the High Court of Kota Bharu Malaysia can be described as follows:

From a philosophical perspective, the judges' deliberations underline the importance of the substantive justice principle, i.e. justice that is not only based on the written rules of law but also considers the broader context such as the defendant's mental state and other human factors. This philosophy reflects an effort to reach a truly just decision by respecting human rights and promoting rehabilitation and social reintegration rather than mere punishment.

From a historical perspective, the Wilfrida Soik case illustrates the complexity of transnational law enforcement and diplomatic relations between Indonesia and Malaysia. Historically, the legal relationship between the two countries has been regulated through bilateral agreements, such as the Indonesia-Malaysia Extradition Treaty signed in 1974. In this context, Malaysian courts, particularly the Kota Bharu High Court, consider the diplomatic and international law aspects involving both countries. The judge's decision to acquit Wilfrida Soik

of the death penalty reflects an emphasis on international law principles and respect for each country's sovereignty. It also shows that the judicial process is not only limited to the application of domestic law but is also influenced by international conventions and existing diplomatic relations.

From a psychological perspective, this case highlights the importance of the defendant's mental state in determining legal decisions. Judges at the Kota Bharu High Court took Wilfrida Soik's mental illness into account, which was a significant factor in the assessment process. The recognition of the defendant's mental state as an exculpatory factor shows how the judicial system takes individuals' psychological state into account in the evidence and decision-making processes. This is important as it reflects the judiciary's efforts to achieve substantive justice, where not only the defendant's actions are assessed, but also their intentions and mental state at the time of the act.

From a sociological perspective, the Wilfrida Soik case also highlighted the role of society and social structure in the legal system. In this context, the judge considered the defendant's social and cultural background, including her origin and economic conditions, which influenced her behavior. Consideration of factors such as age, social background, and mental health demonstrate how criminal law interacts with broader social norms. Furthermore, Wilfrida Soik's acquittal on humanitarian and social justice grounds reflects that the law does not only aim to punish but also rehabilitate and consider the broader social impact of court decisions.

Overall, this case demonstrates how historical, psychological and sociological perspectives can contribute to a more comprehensive understanding of the judicial process. This holistic approach ensures that the decision taken is fair and appropriate, in accordance with the principles of law and justice prevailing in Malaysia and in accordance with the norms of the judiciary.

CONCLUSION

The judgment in Wilfrida Soik's case by the High Court of Kota Bharu highlights the importance of a multifaceted approach in judicial decision-making. The court prioritized substantive justice by considering the defendant's mental health, navigating international relations, and acknowledging psychological and sociological factors. This holistic approach balances legal enforcement, fairness, and rehabilitation, reflecting the evolving role of law in

achieving social justice. The novelty of this research lies in its interdisciplinary analysis of the case from philosophical, historical, psychological, and sociological perspectives, offering a comprehensive understanding of judicial decision-making. It challenges traditional legal analysis by emphasizing the need for a broader, context-sensitive approach to justice.

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Metodologi Penelitian Bidang Hukum