

Mens Rea and Juvenile Criminal Liability in Infanticide Cases: A Comparative Analysis of Indonesian Criminal Law and Fiqh Jinayat

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Abstract

*This study examines the role of mens rea as the core determinant of criminal responsibility in Indonesian criminal law through an analysis of Decision No. 3/Pid.Sus-Anak/2019/PN Gpr concerning juvenile infanticide. Although mens rea is not explicitly formulated in the Indonesian Penal Code (KUHP), Indonesian courts continue to rely on fault-based liability grounded in the principle of *geen straf zonder schuld*. Employing a qualitative doctrinal and socio-legal approach, this research analyzes judicial reasoning, doctrinal interpretations, and medical evidence to assess how intent, negligence, and causality are constructed in cases involving vulnerable offenders. The findings demonstrate that the court rejected a consequence-based model of liability by prioritizing the defendant's subjective mental condition, age, and situational context. The judgment reflects a dualistic doctrinal framework that separates the existence of a criminal act from the attribution of criminal responsibility and applies the doctrine of adequate causation to exclude liability where death is predominantly caused by medical factors. Comparative analysis with English, German, and Islamic criminal law further confirms the convergence toward fault-based liability and the rejection of strict liability in juvenile justice. This study contributes to global debates on juvenile criminal responsibility by offering a doctrinally grounded and child-centered model of criminal attribution that emphasizes proportionality, moral blameworthiness, and substantive justice.*

Kata kunci:

Mens Rea; Tanggung Jawab Pidana Anak di Bawah Umur; Pembunuhan Bayi; Kausalitas dalam Hukum Pidana; Tanggung Jawab Berdasarkan Kesalahan.

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Abstrak

*Studi ini meneliti peran mens rea sebagai penentu utama tanggung jawab pidana dalam hukum pidana Indonesia melalui analisis Keputusan No. 3/Pid.Sus-Anak/2019/PN Gpr tentang pembunuhan bayi oleh anak. Meskipun mens rea tidak secara eksplisit dirumuskan dalam KUHP Indonesia, pengadilan Indonesia terus mengandalkan tanggung jawab berbasis kesalahan yang didasarkan pada prinsip *geen straf zonder schuld*. Dengan menggunakan pendekatan doktrinal dan sosio-legal kualitatif, penelitian ini menganalisis penalaran yudisial, interpretasi doktrinal, dan bukti medis untuk menilai bagaimana niat, kelalaian, dan kausalitas dibangun dalam kasus-kasus yang melibatkan pelaku yang rentan. Temuan menunjukkan bahwa pengadilan menolak model tanggung jawab berbasis konsekuensi dengan memprioritaskan kondisi mental subjektif terdakwa, usia, dan konteks situasional. Putusan tersebut mencerminkan kerangka doktrinal dualistik yang memisahkan keberadaan tindakan kriminal dari atribusi tanggung jawab pidana dan menerapkan doktrin kausalitas yang memadai untuk mengecualikan tanggung jawab di mana kematian sebagian besar disebabkan oleh faktor medis. Analisis komparatif dengan hukum pidana Inggris, Jerman, dan Islam semakin menegaskan konvergensi menuju tanggung jawab berdasarkan kesalahan dan penolakan tanggung jawab mutlak dalam peradilan anak. Studi ini berkontribusi pada debat global tentang tanggung jawab pidana anak dengan menawarkan model atribusi kriminal yang berlandaskan doktrin dan berpusat pada anak yang menekankan proporsionalitas, kesalahan moral, dan keadilan substantif.*

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INTRODUCTION

Cases of infanticide committed by underage mothers are a legal phenomenon that raises serious problems in the criminal justice system in various countries (Cuadros & Lorente, 2025; Niyozova Saparovna, 2025). Globally, this issue is not only related to the loss of human life, but also touches on theoretical problems regarding the criminal responsibility of children, the mental capacity of the perpetrator, and the existence of the element of intent (*mens rea*) in crimes that have fatal consequences (Ar et al., 2024). Comparative studies across jurisdictions show that courts often face a dilemma between protecting the rights of children as perpetrators (juvenile justice) and protecting the rights of victims to life, particularly in cases of hidden births, psychological distress, and extreme social conditions (Hajiyeva, 2024; Nazim, Amjad, & Shahid, 2024). Therefore, infanticide by child perpetrators is no longer understood solely as a moral or domestic issue, but rather as a structural problem in modern criminal law theory that demands a careful assessment of intent, culpability, and legal responsibility.

In criminal law literature, the element of *mens rea* is widely recognized as the main foundation of criminal responsibility, as reflected in the principle of *actus non facit reum nisi mens sit rea* and the principle of *geen straf zonder Schuld* (Njoto, 2024; Sasmita, Suseno, & Jaya, 2023; Situmorang, 2023). A number of studies have examined the role of intent in sentencing, both in the context of homicide and in the juvenile justice system. (Bennet, 2024; Husak, 2023; MacIntyre et al., 2021; van Es, Kunst, & de Keijser, 2020) shows that proving *mens rea* is a crucial factor in determining the severity of criminal sanctions. Meanwhile, in the study of Islamic law, Islamic jurisprudence also places intention (*niyyah*) as a key element in the classification of murder, whether as deliberate (*qatl 'amd*) or unintentional (*qatl khata'*) murder (Aziz, 2016; Salma, Fajri, Hidayat, & Safri, 2022). However, most of these studies are still partial, focusing on normative construction or analysis of decisions that result in criminal convictions, without examining in depth the acquittal (*vrijspraak*) in cases of infanticide committed by child perpetrators.

Based on this complexity, this study aims to analyze in depth the absence of *mens rea* in the criminalization of infanticide cases by underage mothers through a study of District Court Decision Number 3/Pid.Sus-Anak/2019/PN Gpr. This study specifically examines how judges interpret the elements of intent, causality, and the perpetrator's age factor in determining criminal liability. This study is conducted through two legal perspectives, namely Indonesian criminal law and Islamic jurisprudence (*fiqh jinayat*), in order to gain a comparative understanding of the position of intent in the construction of criminal liability. The research questions posed are: how does the absence of *mens rea* affect the criminal liability of children in infanticide cases, and to what extent do judges' considerations in Indonesian criminal law align with the principles of Islamic jurisprudence (*fiqh jinayat*)?

This research fills a research gap in criminal law studies, which have not explicitly placed acquittals in child murder cases as the primary object of analysis, particularly in the context of underage perpetrators. Furthermore, there are few studies that systematically link the doctrine of mens rea in positive criminal law with the concept of niyyah in Islamic jurisprudence, as two legal regimes that both place intent as the basis for accountability. The contribution of this research is both theoretical and practical: theoretically, this research enriches the global discourse on juvenile criminal liability and infanticide with a comparative perspective; practically, the research findings are expected to serve as a reference for judges and policymakers in formulating a more equitable approach to sentencing, particularly in cases of infanticide committed by child perpetrators without malice.

METHOD

This study employs a qualitative legal research design that combines doctrinal (normative) legal research and a socio-legal approach (McConville, 2017; Mitchell, 2022). The doctrinal component is used to examine legal norms, principles, and doctrines governing criminal liability, mens rea, and juvenile justice within Indonesian criminal law and Islamic criminal jurisprudence (fiqh jinayat). Meanwhile, the socio-legal dimension is applied to understand how these legal doctrines are interpreted and operationalized by judges in concrete judicial practice, particularly in cases involving juvenile offenders and infanticide. This combined approach enables the study to move beyond abstract legal norms and capture the interaction between legal doctrine, judicial reasoning, and social context.

The primary case examined in this research is Decision No. 3/Pid.Sus-Anak/2019/PN Gpr, concerning the acquittal of a juvenile defendant in an infanticide case. This case was purposively selected for three main reasons. First, it represents a rare judicial outcome in Indonesian criminal law, where a defendant was acquitted despite the occurrence of death, due to the absence of proven mens rea. Second, the case involves a minor as both offender and parent, raising complex issues of juvenile criminal liability, mental capacity, and moral blameworthiness. Third, the judicial reasoning explicitly addresses intent, causality, and age as decisive factors, making the case particularly relevant for analyzing the theoretical role of mens rea in criminal responsibility. These characteristics render the case analytically significant rather than statistically representative.

This study adopts a comparative legal framework to analyze the concept of intent and criminal liability across two legal systems: Indonesian positive criminal law and fiqh jinayat (Badar & Marchuk, 2013; Chiesa, 2014). Indonesian criminal law is examined through statutory provisions, criminal law doctrines, and judicial interpretations related to mens rea, actus reus, culpability, and juvenile justice. These findings are then compared with Islamic criminal jurisprudence, focusing on the doctrines of niyyah, qatl 'amd, qatl khata', and the legal consequences of unintended killing. The comparative analysis is functional in nature, aiming to identify similarities and differences in how

both systems conceptualize intent and determine criminal responsibility, rather than merely contrasting normative texts.

RESEARCH RESULTS AND DISCUSSION

Results

1. The Position of Mens Rea in Indonesian Criminal Law

Research results indicate that mens rea is a fundamental element of criminal liability in Indonesian criminal law, although it is not explicitly formulated in the Criminal Code. This principle is rooted in the principle of "geen straf zonder schuld" developed in the continental criminal law tradition, as emphasized by Simons and Rummelink, which states that punishment without internal fault is contrary to substantive justice. In Decision No. 3/Pid.Sus-Anak/2019/PN Gpr, this principle is reflected in the panel of judges' focus on proving the defendant's internal state of mind, rather than solely on the consequences of the infant's death.

In Indonesian judicial practice, mens rea is understood as the internal state of mind that accompanies a criminal act (actus reus) and serves as the basis for assessing guilt, in line with Moeljatno's view that places fault as a prerequisite for criminal liability. This approach is also consistent with Barda Nawawi Arief's opinion, which asserts that Indonesian criminal law adheres to the principle of fault as a general principle. In the case a quo, the judge considered the defendant's psychological condition—a 15-year-old who gave birth in a panic—as evidence of the absence of a criminally reprehensible mental attitude.

This study also found that the differences between monistic and dualistic schools of thought have direct implications for the assessment of mens rea. The monistic school, as espoused by Simons, views the elements of conduct and guilt as a single entity, while the dualistic school, pioneered by Moeljatno, separates the criminal act from criminal responsibility. The Gresik District Court's decision demonstrates a tendency toward a dualistic approach, because even though the factual event was proven, the judge deemed that criminal responsibility could not be imposed without proof of mental guilt.

2. Forms of Errors in Criminal Law

The study shows that wrongdoing (schuld) in Indonesian criminal law consists of two main forms: intent (dolus) and negligence (culpa). Intention is understood as the presence of will and knowledge (willens en wetens) of the act and its consequences. In this case, the public prosecutor based the indictment on the defendant's alleged intent, but failed to prove any intent to kill the infant.

Intentionality in Indonesian criminal law is classified into three forms: intent as intent, certainty, and probability. The panel of judges in Decision No. 3/Pid.Sus-Anak/2019/PN Gpr found that none of these forms of intent were met. There was no evidence that the defendant had the intention to kill the infant, knew with certainty that his actions would cause death, or was aware of the potential consequences but continued his actions.

In addition to intent, the judge also considered the possibility of negligence (*culpa*). However, negligence requires a standard of care that can be reasonably imposed on the perpetrator. Based on the trial facts and expert testimony, the defendant, who was only 15 years old, gave birth prematurely under emergency conditions and without medical knowledge, so her failure to save the baby cannot necessarily be classified as criminal negligence.

3. Legal Facts and Court Decision No. 3/Pid.Sus-Anak/2019/PN Gpr

The legal facts revealed at trial indicate that the baby was born prematurely and extremely weak. This was proven through expert medical testimony and documentary evidence in the form of a post-mortem examination. The baby died shortly after birth due to biological and medical conditions, not due to any violence or active actions by the defendant. The panel of judges determined that the causal link between the defendant's actions and the baby's death had not been legally and convincingly proven. In their deliberations, the judges stated that the baby's death was caused more by prematurity and delayed medical treatment than by the defendant's actions. This consideration demonstrates the strict and careful application of the theory of causality in material crimes.

This decision also demonstrates the court's disregard for the strict liability approach in cases involving children. The judges refused to impose criminal responsibility solely on the basis of death, without proving fault. This stance demonstrates the court's consistent upholding of the principles of child protection and substantive justice in criminal law.

Based on these considerations, the panel of judges issued an acquittal (*vrijspraak*) under Article 191 paragraph (1) of the Criminal Procedure Code. The failure to fulfill the *mens rea* element and the failure to prove a causal relationship were the primary basis for the verdict. Thus, the results of this study confirm that in Indonesian criminal law, particularly in infanticide cases involving child perpetrators, criminal punishment can only be justified if all elements of criminal responsibility are fully and convincingly proven.

Discussion

This discussion is grounded in fault-based criminal responsibility theory, which positions *mens rea* as the normative core of criminal liability, complemented by doctrines of culpability (*schuld*), causality, and proportionality (Badar, 2013; Brink, 2019). Drawing primarily on the continental dualistic framework which distinguishes between the objective elements of an offense (*actus reus*/Tatbestand) and the subjective attribution of blame (*mens rea*/Schuld) this section analyzes how courts operationalize these doctrines in concrete cases involving juvenile offenders and neonatal death. The discussion further integrates theories of intent and negligence, adequate causation, and child-centered criminal justice principles to assess whether criminal liability can be legitimately imposed in situations marked by psychological vulnerability and medical emergency. By combining doctrinal analysis with judicial reasoning and comparative

perspectives, this section aims to demonstrate how classical fault theory is contextually reinterpreted and applied to prevent unjust outcome-based punishment.

Mens Rea as the Core of Criminal Responsibility: Doctrinal and Judicial Convergence

This study demonstrates that mens rea remains the core determinant of criminal liability in Indonesian criminal law, despite its absence as an explicit term in the KUHP. This finding reinforces the classical continental doctrine embodied in the principle of *geen straf zonder schuld*, which has been consistently defended by scholars such as Simons, Remmelink, and Pompe. The court's reasoning in Decision No. 3/Pid.Sus-Anak/2019/PN Gpr illustrates that criminal responsibility is not derived from the mere occurrence of harm, but from a normative evaluation of the offender's mental state at the time of the act. Rather than adopting a consequence-based or outcome-oriented approach, the court grounded its analysis in the subjective condition of the offender. By closely examining the defendant's age, psychological state, and situational context, the court emphasized that punishment must be morally justified through demonstrable fault. This approach reflects a substantive understanding of criminal liability, in which the presence of harm does not automatically translate into culpability without accompanying blameworthiness.

From a doctrinal perspective, this reasoning aligns with Moeljatno's dualistic conception, which clearly separates the existence of a criminal act (*actus reus*) from the attribution of criminal responsibility (*mens rea*). The court implicitly affirmed this separation by acknowledging that although a death occurred, criminal responsibility could not be imposed in the absence of a blameworthy mental state. This doctrinal clarity prevents the conflation of harmful outcomes with criminal guilt and preserves the internal coherence of fault-based criminal law.

This judicial stance confirms that Indonesian courts continue to resist strict liability models in serious criminal cases, particularly those involving vulnerable offenders such as children (Muchtar, Irwansyah, Yunus, Arifin, & Faried, 2024; Riyadi, 2024). By refusing to impose liability solely on the basis of outcome, the court positioned Indonesian criminal jurisprudence within a broader normative framework that prioritizes proportionality, moral legitimacy, and individualized justice. In doing so, the decision contributes to an evolving body of jurisprudence that reaffirms mens rea as the cornerstone of criminal responsibility in both domestic and comparative contexts.

Reinterpreting Intent and Negligence in Juvenile Infanticide Cases

The discussion further reveals that traditional classifications of fault *dolus* and *culpa* require careful contextual reinterpretation when applied to juvenile offenders. Classical criminal law doctrine, as articulated by Pompe and Hazewinkel-Suringa, conceptualizes intent as a synthesis of knowledge and will (*willens en wetens*) (Pompe, 1987). However, the court's assessment in this case demonstrates that these elements cannot be mechanically inferred from outward behavior alone, particularly when the conduct occurs under conditions of panic, psychological distress, and medical

emergency. This reasoning highlights the limits of formalistic fault attribution in cases involving minors.

The court's approach underscores that intent is not a purely objective construct but a subjective condition that must be assessed in light of the offender's cognitive and emotional capacities. Juvenile offenders, by virtue of their developmental stage, may lack the ability to fully comprehend or anticipate the consequences of their actions. By refusing to presume intent from the mere occurrence of a fatal outcome, the court aligned itself with a substantive understanding of mens rea that prioritizes internal culpability over external appearance.

Equally significant is the court's rejection of the assumption that negligence (culpa) can be automatically inferred from the defendant's failure to save the newborn. As emphasized by Van Hamel and Simons, negligence presupposes a breach of a standard of care that can reasonably and normatively be expected from the actor. In this case, the defendant's age, lack of medical knowledge, and the sudden nature of the childbirth undermined the applicability of such a standard, rendering the attribution of negligence legally and morally problematic.

By narrowing the scope of punishable negligence in this manner, the court effectively prevented the over-criminalization of structurally vulnerable actors. This reasoning reflects a broader commitment to proportionality and fairness in criminal responsibility, ensuring that criminal law does not impose liability where the actor lacks both the intent and the realistic capacity to act otherwise. In doing so, the decision contributes to contemporary debates on how fault doctrines should be adapted to account for vulnerability, immaturity, and emergency contexts in juvenile criminal justice.

Causality, Medical Factors, and the Limits of Criminal Attribution

A key contribution of this case lies in its rigorous and disciplined application of causality theory in criminal law. Drawing implicitly on the doctrine of adequate causation (adequate veroorzaking), the court clearly distinguished between a mere factual sequence of events and legally relevant causation. This distinction is crucial in criminal law, as not every act that precedes a harmful outcome can be treated as its legal cause. Consistent with Remmelink's formulation, the court rejected a simplistic post hoc reasoning that would equate temporal proximity with criminal causality.

The court's reasoning demonstrates that causality in criminal law requires a normative evaluation of whether the defendant's conduct can reasonably be regarded as the cause of death. In this case, the judges emphasized that the infant's death could not be legally attributed to the defendant's actions because the biological condition of prematurity substantially determined the fatal outcome. This approach reflects a doctrinal commitment to filtering causation through legal relevance, rather than treating causation as a purely empirical or chronological relationship. Medical evidence played a decisive role as an intervening factor (novus actus interveniens) that disrupted the causal chain. Expert testimony and medical documentation indicated that the infant's

extreme prematurity and physiological fragility were sufficient, in themselves, to explain the death. By giving decisive weight to this evidence, the court affirmed that criminal liability cannot be imposed where the dominant cause of death lies in non-human, medical conditions beyond the offender's control. This reasoning prevents the expansion of criminal responsibility into areas better addressed by medical or social responses.

In broader doctrinal terms, the decision contributes to contemporary debates on the limits of criminal attribution in cases involving complex medical causation. As criminal cases increasingly intersect with medical emergencies and biological vulnerabilities, this judgment illustrates a principled boundary for criminal law: liability must be grounded in demonstrable causal contribution combined with culpability. By refusing to stretch causation to cover tragic but medically driven outcomes, the court reinforces the normative integrity of criminal law and safeguards it from becoming an instrument of outcome-based or symbolic punishment.

Normative Implications: Rejecting Strict Liability in Child-Centered Criminal Justice

The court's reasoning reflects a broader normative orientation that is consistent with contemporary criminal justice theory, particularly the centrality of fault-based liability in legitimizing punishment (Wibowo, 2025). As emphasized by Barda Nawawi Arief, criminal responsibility must be grounded in personal blameworthiness rather than the mere occurrence of harm, while Andrew Ashworth similarly argues that punishment without fault undermines proportionality and moral credibility in criminal law. By explicitly examining the defendant's mental state, age, and situational vulnerability, the court reaffirmed that criminal liability serves not only a retributive function but also a moral evaluative role that distinguishes blameworthy conduct from tragic but non-criminal events.

The rejection of strict liability in this case is especially significant in the context of juvenile justice. Contemporary criminal justice theory increasingly recognizes that children and adolescents possess limited cognitive, emotional, and moral capacities compared to adults. The court's refusal to infer intent or negligence solely from the fatal outcome aligns with international child-centered justice principles, which caution against attributing full criminal responsibility to juveniles without clear evidence of culpable mental states. This approach underscores a commitment to substantive justice that accounts for developmental vulnerability rather than prioritizing symbolic condemnation.

This normative stance gains further relevance when situated within global debates on juvenile liability and infanticide (BURMAN, 1996). In several jurisdictions, infanticide cases are still addressed through punitive or consequence-driven frameworks that emphasize the gravity of the outcome rather than the offender's psychological condition. In contrast, the Indonesian court's reasoning illustrates an alternative model that balances legal certainty with moral blameworthiness by integrating doctrinal fault theory, medical evidence, and the offender's subjective

condition. Such an approach avoids the risk of over-criminalization in cases marked by medical emergency and social vulnerability.

Ultimately, the decision contributes to an emerging transnational discourse that redefines criminal responsibility in cases involving neonatal death and juvenile offenders. By foregrounding mens rea and rejecting automatic liability based on outcome alone, the court positions Indonesian criminal law within a broader movement toward humane, proportional, and morally defensible punishment. This normative orientation not only enhances the internal coherence of Indonesian criminal jurisprudence but also strengthens its compatibility with leading international standards on juvenile justice and criminal responsibility.

Comparative Perspectives on Mens Rea and Juvenile Criminal Responsibility

From a comparative perspective, the Indonesian court's emphasis on *mens rea* aligns closely with developments in English criminal law, particularly in cases involving infanticide and diminished responsibility. In the United Kingdom, the Infanticide Acts of 1938 and 1978 recognize that the mental disturbance of a mother caused by childbirth or lactation fundamentally alters criminal responsibility (Lambie, 2001; Mason, 2021). English courts do not treat neonatal death as an automatic homicide but require proof that the defendant possessed the requisite mental element, taking into account psychological vulnerability and medical conditions. This approach mirrors the reasoning in Decision No. 3/Pid.Sus-Anak/2019/PN Gpr, where panic, immaturity, and medical emergency negated the presumption of intent or negligence.

Similarly, German criminal law under the *Strafgesetzbuch* (StGB) emphasizes *Schuldprinzip* (the principle of culpability), which closely resembles the Indonesian adherence to *deen straf zonder schuld* (Bohlander, 2008; Dubber, 2005). German doctrine strictly distinguishes between *Tatbestand* (objective elements of the offense) and *Schuld* (personal blameworthiness), particularly when assessing juvenile offenders. German courts apply a heightened threshold for attributing intent or negligence to minors, requiring demonstrable cognitive and moral capacity (*Einsichtsfähigkeit*). The Indonesian court's reliance on the defendant's age, psychological condition, and lack of medical knowledge reflects a comparable doctrinal commitment to individualized culpability assessment rather than outcome-based punishment.

In Islamic criminal law (fiqh jināyah), the centrality of intent (*niyyah*) further reinforces the comparative relevance of this case (Afriyanti, Fahira, & Prasetyo, 2024; Kamali, 2019). Classical jurists consistently hold that criminal liability especially in homicide cases depends on the presence of intentional killing (*qatl 'amd*), semi-intentional killing (*shibh 'amd*), or unintentional killing (*qatl khata'*). The absence of intent and the lack of a commonly lethal instrument exclude the application of *qisas* and instead shift responsibility toward mitigated forms of accountability, such as *diyyat*. In the present case, the absence of intent and the dominance of medical causation resonate strongly with the Islamic classification of unintentional killing, thereby demonstrating doctrinal

convergence rather than conflict between Indonesian criminal law and Islamic legal principles.

Taken together, these comparative perspectives demonstrate that the Indonesian court's reasoning is not doctrinally isolated or culturally exceptional. Instead, it reflects a broader transnational commitment to fault-based criminal responsibility, particularly in cases involving neonatal death and vulnerable offenders. By resisting strict liability and foregrounding *mens rea*, Indonesian criminal jurisprudence aligns with leading approaches in common law, civil law, and Islamic legal traditions, reinforcing the global relevance and normative legitimacy of the decision.

CONCLUSION

This study offers a novel contribution by demonstrating that *mens rea* functions not merely as a doctrinal abstraction but as an operative judicial filter in juvenile infanticide cases. Unlike previous studies that focus on statutory interpretation or moral condemnation, this research reveals how Indonesian courts actively employ dualistic fault theory and causality doctrine to prevent unjust criminal attribution in medically and psychologically complex cases. The research refines fault theory by showing that classical concepts of intent and negligence must be contextually calibrated when applied to juvenile offenders. It bridges classical continental doctrine with contemporary child-centered criminal justice theory. Practically, this study provides guidance for judges and prosecutors in assessing *mens rea* and causality in cases involving child offenders and neonatal death, emphasizing the necessity of medical evidence and psychological assessment before attributing criminal liability.

This study has several limitations that should be acknowledged. First, the analysis is based on a single court decision, which allows for in-depth doctrinal examination but limits broader generalization across juvenile infanticide cases in Indonesia. Second, the study relies primarily on textual analysis of judicial reasoning without incorporating empirical data such as interviews or courtroom observations, thereby constraining insights into decision-making processes beyond the written judgment. Third, while classical and contemporary criminal law doctrines are employed, the comparative dimension remains limited and does not systematically engage with foreign case law or statutory regimes. Finally, the research focuses on legal constructions of *mens rea* and causality, leaving socio-psychological and structural factors surrounding adolescent pregnancy outside its primary analytical scope, which may be addressed in future interdisciplinary research.

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