

Enforcement of Satisfaction Decisions in the Jambi Corruption Court: Normative Analysis through the Lens of Islamic Criminal Law

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Abstract

Indonesia's constitutional commitment to the rule of law requires every exercise of public authority to be lawful, equal, and accountable; however, persistent gratification offenses convert public office into a private commodity and thereby erode institutional legitimacy. This study analyzes the enforcement of gratification judgments at the Jambi Corruption Court, examines the ratio decidendi underlying judicial sanctions, and evaluates that process through Islamic criminal law (*fiqh jinayah*) in order to construct an integrative model of justice. Employing a normative-empirical qualitative design, three final and binding judgments were examined through doctrinal content analysis aligned with *maqasid*-based Islamic legal theory. The findings show that, although the judgments satisfy formal legality and evidentiary sufficiency, their execution reveals a persistent gap between law in the verdict and law in implementation, while judicial reasoning remains formalistic, distinguishing offenders by institutional visibility rather than by an explicit doctrine of proportional culpability rooted in the breach of *amanah*. Viewed through *risywah*, *ghulul*, *hadiyyat al-'ummal*, and *jarimah ta'zir*, gratification constitutes a multidimensional violation of public trust. The study concludes by proposing an integrative model that synthesizes legal, moral, and public justice, and recommends that judges explicitly incorporate breach of trust as an aggravating factor, while enforcement authorities apply monitored and transparent restitution mechanisms.

Keywords: Gratification, ratio decidendi, *fiqh jinayah*, rule of law, integrative justice

Abstrak

Komitmen konstitusional Indonesia terhadap *supremasi hukum* mewajibkan setiap pelaksanaan kewenangan publik dijalankan secara sah, setara, dan bertanggung jawab, namun pelanggaran kepuasan terus-menerus mengubah jabatan publik menjadi komoditas pribadi, sehingga mengikis legitimasi institusional. Studi ini bertujuan menganalisis pelaksanaan putusan kepuasan di Pengadilan Korupsi Jambi, memeriksa *ratio decidendi* yang mendasari hukuman yudisial, dan mengevaluasi proses tersebut melalui perspektif hukum pidana Islam (*fiqh jinayah*) untuk membangun model keadilan integratif. Dengan menggunakan desain kualitatif normatif-empiris, tiga putusan akhir dan mengikat dianalisis melalui analisis isi doktrinal yang dicocokkan dengan teori hukum Islam berbasis *maqasid*. Temuan tersebut mengungkapkan bahwa meskipun putusan tersebut memenuhi legalitas formal dan kecukupan bukti, pelaksanaannya mengungkapkan kesenjangan yang terus-menerus antara hukum dalam keputusan dan hukum dalam pelaksanaan, dan bahwa penalaran yudisial tetap formalistik, membedakan pelaku berdasarkan visibilitas institusional daripada doktrin eksplisit tentang kesalahan proporsional yang berakar pada pengkhianatan *amanah*. Jika dilihat melalui *risywah*, *ghulul*, *hadiyyat al-'ummal*, dan *jarimah ta'zir*, kepuasan merupakan

pelanggaran multidimensi terhadap kepercayaan publik. Studi ini diakhiri dengan mengusulkan model integratif yang mensintesis *keadilan hukum*, *keadilan moral*, dan *keadilan publik*, serta merekomendasikan agar hakim secara eksplisit memasukkan aggravasi pengkhianatan kepercayaan sementara otoritas pelaksana menerapkan mekanisme restitusi yang dipantau dan transparan.

Kata Kunci: Kepuasan, rasio decidendi, fiqh jinayah, supremasi hukum, keadilan integratif

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INTRODUCTION

Indonesia's constitutional identity as a state rooted in *the rule of law*, as set forth in Article 1(3) of the 1945 Constitution, stipulates the obligation that any exercise of public power must be carried out in accordance with the law, applied equally, and made accountable through judicial mechanisms. The *rule of law* is not just a formal arrangement of legality; it is a normative commitment to limit arbitrary power and ensure that the outcome of the law is in accordance with the rules promulgated, not with the preferences of those holding authority.¹ This kind of system requires that the coercive power of the state, including the power to punish, is never exercised outside the limits established by the law itself. Corruption, particularly breaches of satisfaction involving public officials, directly threatens this commitment because it turns public authority into a private commodity, eroding the predictability and equal application of the law that *the rule of law* is meant to secure. For this reason, corruption is generally treated as an extraordinary crime that requires extraordinary countermeasures, as it has been widely recognized as one of the most persistent obstacles to good governance, undermining institutional legitimacy and public trust in the state.²

Complacency occupies a distinctive position among corruption offenses because its invalidity does not depend on the overt exchange of transactions, but rather on the relationship between the benefits received

¹ Jens Meierhenrich and Martin Loughlin, "The Cambridge Companion to the Rule of Law," *American History* 1861, No. 1900 (2021), <https://doi.org/10.1017/9781108600569>.

² Habeeb Abdulrauf Salihu, "Corruption: An Impediment to Good Governance," *J. Fin. Crime* 29 (2022): 101, <https://doi.org/10.1108/JFC-11-2020-0235>.

and the positions held by the recipient. When public officials receive benefits associated with their authority, the line between legitimate courtesy and illegitimate influence becomes blurred, thus creating conflicts of interest that distort public decision-making and public services. The empirical record of major corruption shows that such practices are rarely isolated incidents; they tend to be recurring in patronage networks that survive changes of government, reinforcing partiality in public procurement and policy-making in various governments.³ Because public office is essentially a mandate exercised on behalf of the community, not a personal right, the abuse of that mandate for personal gain constitutes a violation of accountability that state law seeks to address through criminal sanctions and administrative recovery of unlawfully obtained benefits.⁴

In addition to the positive legal dimension, satisfaction also carries a strong moral and religious meaning in Muslim-majority Indonesian society. The study of Islamic law places public office as *a mandate*, a trust that must be carried out for the benefit of the community, not for personal gain. Concepts such as *risywah* (bribery), *ghulul* (violation of public trust), *khiyanah* (betrayal of mandates), and *hadiyyat al-'ummal* (gifts to officials) provide a normative vocabulary in which abuse of power can be judged not only as a violation of the law but also as moral and social corruption that undermines the well-being of the community.⁵ This dual character of satisfaction, as well as positive violations of law and violations of religious-based beliefs, invites an integrative analytical approach that does not address state law and Islamic criminal law, or *fiqh jinayah*, as

³ Elizabeth Dávid-Barrett and Mihály Fazekas, "Grand Corruption and Government Change: An Analysis of Partisan Favoritism in Public Procurement," *European Journal on Criminal Policy and Research* 26, no. 4 (2020): 411–30, <https://doi.org/10.1007/s10610-019-09416-4>.

⁴ Henny Juliani, "Accountability of Government Officials as a Result of Abuse of Authority That Causes State Losses," *Administrative Law and Governance Journal* 3, no. 1 (2020): 54–70, <https://doi.org/10.14710/alj.v3i1.54-70>.

⁵ Waled Younes E Alazzabi, Hasri Mustafa, and Ahmed Razman Abdul Latiff, "Corruption and Control from the Perspective of Islam," *Journal of Financial Crime* 27, no. 2 (2020): 355–68, <https://doi.org/10.1108/JFC-02-2019-0020>.

mutually exclusive frameworks but as a source of complementary normative evaluation.⁶

The Corruption Court attached to the Jambi District Court occupies a strategic position in enforcing anti-corruption norms at the provincial level, given its jurisdiction over cases involving regional executives, legislatures, and private actors. As a specialized chamber in the general court, it is expected to combine doctrinal rigor with sensitivity to the socio-political context in which corrupt exchanges occur. Some of the decisions handed down by this court illustrate a wide range of satisfaction cases that have reached the courts, ranging from provincial governors who have been convicted of receiving benefits related to regional development projects, private entrepreneurs who have been convicted of facilitating payments related to public decision-making, to several provincial legislators who have been convicted of satisfaction related to the discussion of regional budgets. These cases have the same structural characteristics: benefits flow to individuals precisely because of the authority they have, reproducing a familiar pattern in which power itself becomes a monetizable resource, regardless of whether the recipient occupies executive, legislative, or purely private positions.

However, a verdict that satisfies formal legality does not automatically guarantee that justice has been substantially achieved. Sentencing theory distinguishes between formal punitive measures and their underlying justification objectives, whether retaliative, deterrent, rehabilitative, or restorative, and warns that the severity of the punishment must have a maintainable relationship to the seriousness of the offense, rather than being mechanically determined solely by the nominal value of the satisfaction.⁷ Comparative evidence on further deterrence suggests that the relationship between the severity of sanctions and future compliance is much more complex than the simple assumption

⁶ M Zulfa Aulia, "The Progressive Law of Satjipto Rahardjo: History, Urgency, and Relevance," *Invite: Legal Journal* 1, no. 1 (2018): 159–85, <https://doi.org/10.22437/ujh.1.1.159-185>.

⁷ Philip Petrov, "Proportionality in Criminal Sentencing: A Cognitive Hypothesis," *Oxford Journal of Legal Studies* 43, no. 1 (2023): 124–49, <https://doi.org/10.1093/ojls/gqac020>.

that heavier punishment automatically results in stronger deterrence, as much depends on the certainty and consistency of enforcement rather than on just the nominal length of the sentence.⁸ Sentencing outcomes can also be adjusted after new information about the perpetrator emerges during sentencing, suggesting that punishment is not a static one-time determination, but rather an ongoing process that must remain responsive to its basic purpose throughout its execution.⁹ Taken as a whole, these findings suggest that formal adherence to sentencing procedures cannot be equated with the achievement of justice in both the sense of retribution and restoration.

These theoretical insights reveal a persistent gap in the study of satisfaction courts in Indonesia, particularly in the Jambi Corruption Courts: although judicial reasoning is generally evaluated through the lens of formal legality, attention is paid to whether such reasoning also reflects the moral weight of betraying public trust, whether the implementation of judgments actually restores what was illegally obtained, and whether the prevailing pattern of punishment can be reconciled with broader concepts of justice that go beyond legal certainty to include religious-grounded notions of accountability and shared well-being.¹⁰ Existing anti-corruption strategies have also been criticized for relying too heavily on rigid and uniform models of law enforcement rather than adapting to the fluid and evolving character of corrupt practices, suggesting that both courts and the implementation of judgments require a more integrative and context-sensitive approach.¹¹

⁸ Maurice J G Bun et al., "Crime, Deterrence and Punishment Revisited: MJG Bun," *Empirical Economics* 59, no. 5 (2020): 2303–33, <https://doi.org/10.1007/s00181-019-01758-6>.

⁹ A Mitchell Polinsky and Steven Shavell, "Deterrence and the Adjustment of Sentences during Imprisonment," *American Law and Economics Review* 23, no. 2 (2021): 481–519, <https://doi.org/10.1093/aler/ahab004>.

¹⁰ Yasmine Bouzora, "Between Substance and Autonomy: Finding Legal Certainty in Google Shopping," *Journal of European Competition Law & Practice* 13, no. 2 (2022): 144–53, <https://doi.org/10.1093/jeclap/lpac009>.

¹¹ Hendi Yogi Prabowo and Suherita Suherita, "Be like Water: Developing a Fluid Corruption Prevention Strategy," *Journal of Financial Crime* 25, no. 4 (2018): 997–1023, <https://doi.org/10.1108/JFC-04-2017-0031>.

These gaps exist threefold: the object-related gap regarding the limited attention given to the execution of judgments rather than just gambling; the analytical gap that arises from the separation between evidentiary, doctrinal, and sentencing analysis; and a theoretical gap that reflects the absence of studies that integrate *the rule of law*, punishment theory, progressive legal thought, and Islamic criminal law in a single analytical framework.

Based on this background, this study examines the implementation of the satisfaction verdict issued by the Jambi Corruption Court through a normative analysis based on the perspective of Islamic criminal law. Three objectives guide this investigation: first, to analyze how the satisfaction verdict is executed in practice, including the conformity between the operational provisions of the verdict and its actual implementation; second, to examine the orientation of the punishment and *the decidendi ratio* underlying judicial reasoning in the case of satisfaction; and third, to evaluate the implementation of these judgments through the lens of *fiqh jinayah*, with the aim of establishing an integrative model that reconciles the rule of law, modern punishment theory, progressive legal thought, and Islamic criminal law principles. This integrative orientation is intended to move the evaluation of satisfaction enforcement beyond the formalistic and narrow reading of legality towards the concepts of justice, accountability, and public trust that are based substantially in the implementation of anti-corruption laws.

METHODS

The study adopts a normative-empirical (social-legal) qualitative design, combining a positive legal doctrinal analysis with an interpretation of Islamic criminal law sources. The main data consists of three satisfaction judgments handed down by the Jambi Corruption Court, selected through sampling for the purpose of sampling based on the criteria that each case has achieved final and binding legal force, involves satisfaction associated with public office, and contains judicial

reasoning that is sufficiently detailed to allow *a ratio decidendi* analysis, and provides traceable information regarding the implementation of applicable provisions. This primary legal material is complemented by secondary sources, including legal provisions on the eradication of corruption, both classical and contemporary *fiqh in literature*, and relevant scientific commentary. Data were collected through documentary studies of verdict texts, legal instruments, and doctrinal writings, rather than through field interviews. The analysis was conducted through qualitative content and doctrinal analysis, in which the reasoning of each judgment was examined against indicators of *the rule of law* and matched against an evaluative lens drawn from progressive legal thinking regarding the recovery of illegally acquired state assets.¹² The *jinayah fiqh* was analyzed through a system-oriented, *maqasid-approach* based on Islamic legal theory, which placed individual judgments within a broader framework of purpose rather than treating them separately.¹³ The findings on official accountability for abuse of authority are further aligned with the well-established doctrinal record of the responsibility of state officials.¹⁴ Conclusions are drawn through interpretive synthesis across these three analytical layers, rather than statistical inference, culminating in the development of an integrative model for evaluating and implementing satisfaction judgments.

RESULTS AND DISCUSSION

1. Execution of Satisfaction Decision at the Jambi Corruption Court

a. Case profile and structural pattern of satisfaction

An analysis of the three rulings handed down by the Jambi Corruption Court reveals that satisfaction violations involving public officials are rarely isolated individual deviations; rather, they show a recurring structural pattern in which *access*

¹² Sebastian Sindarto, "The Policy of Saving State Finances from Corruption Crimes Based on a Progressive Legal Perspective," *Journal of Legal Reform* 25, no. 2 (2021): 182–201, <https://doi.org/10.46257/jrh.v25i2.321>.

¹³ Ilham Mashuri, "A Systems Approach in Islamic Legal Theory (Jasser Auda's Perspective)," *FITRAH: Journal of Islamic Studies* 5, no. 1 (2020): 11–28, <https://doi.org/10.24952/fitrah.v5i1.1106>.

¹⁴ Yudistira Rusydi, "Accountability of State Officials for Abuse of Authority," *Journal of Legal Certainty and Justice* 4, no. 1 (2022): 31–44, <https://doi.org/10.32502/khk.v4i1.4733>.

to public authority is transformed into a tradable resource. Judgments regarding incumbent provincial governors show that benefits associated with regional infrastructure projects are channeled precisely because the recipient holds the highest executive office in the province, while judgments involving private entrepreneurs show that satisfaction can also come from outside the bureaucracy, flowing to officials through patronage-based informal networks, rather than explicit transaction agreements. The third ruling, which pertains to several provincial legislators, illustrates a further variation in which satisfaction is part of the regional budget discussion, which involves the collective exercise of legislative authority rather than a single official acting alone.

When read together, these three cases confirm that the invalidity of satisfaction does not depend on the form of benefit, but on its functional relationship with the position held by the recipient (*position relationship*). Whether the perpetrator is the chief executive of the region, a private economic actor, or a member of a representative body, the abuse of the mandate of the public mandate entrusted to the benefit of the community is what turns a person who appears innocuous outwardly of the gift into a form that is criminally legalized by *risywah*. These findings are consistent with the broader theoretical explanation that state accountability for abuse of authority is triggered not by the discretionary character of the official act itself, but rather by the difference between the purpose of granting discretionary power and the personal interests actually served by its exercise.¹⁵ If discretion is exercised in a manner separate from its legal purpose, the benefits received by officials, whatever their outward label, lose their character as legitimate private transactions and become evidence of an underlying breach of public trust.

It should also be noted that the three cases cover the entire spectrum of actors that may be involved in fulfillment networks: executive officials exercising administrative discretion over public projects, private economic actors initiating or maintaining corrupt exchanges for commercial gain, and legislatures entrusted with budget oversight. This spectrum suggests that satisfaction within Jambi's jurisdiction cannot be adequately understood as a series of unrelated individual offenses; rather, it serves as a *relational offense* in which the giver, intermediary, and receiver each play a structurally necessary role. The presence of private entrepreneurs as joint offenders of public officials suggests that law enforcement efforts that focus solely on the recipient of the transaction risk leaving the side of the network resulting in the

¹⁵ Muhammad Shodik Aviano, "The Accountability of Government Officials Who Use Discretion According to Positive Law in Indonesia," *Journal of Law and Notary* 6, no. 2 (2022): 1297–1325, <https://doi.org/10.33474/hukeno.v6i2.17640>.

requests of beneficial initiators to obtain favorable administrative or budgetary outcomes less scrutinized.

b. Forms of Punishment: Main and Additional Sanctions

The sentencing structure applied in all three judgments shows a layered configuration that combines the primary punishment (imprisonment and fines) with additional punishments (restitution payments, confiscation of assets, and, in one case, the revocation of political rights). This configuration suggests that courts do not treat gratification solely as an act of revenge, but, at least formally, seek to integrate a *restorative dimension* aimed at regaining the benefits illegally obtained. Table 1 summarizes the main features of sentencing among the three judgments examined in this study.

Table 1. Comparative Review of Sentencing Results in Three Satisfaction Decisions at the Jambi Corruption Court

Aspects	The Case of the Regional Head	Personal Actor Cases	Legislative Member's Case
Position of the perpetrator	Provincial Governors	Private Entrepreneurs	Some regional legislators
Main sanctions	Imprisonment; hefty fines	Imprisonment; fines	Imprisonment; fines
Additional sanctions	Confiscation of assets; partial revocation of political rights	Restitution related to unauthorized benefits	Individual restitution obligations for each convicted member
Reasons for dominant (explicit) punishment	Deterrence; Retaliation	Retaliation	Retaliation; proportional individualization
Explicit references to breaches of public trust	Present but not explained further	Most are absent	There is but is narrowly framed on budget functions

As Table 1 shows, the severity and composition of sanctions differ depending on the position of each perpetrator, yet the basic justification language used by judges remains highly uniform across all three rulings, relying primarily on the fulfillment of

legal elements rather than explicit theories as to why officials of different ranks are entitled to different moral responsibilities. The uniformity in this reasoning, despite the differing results, suggests that sentencing distinctions are driven by an intuitive, rather than systematically articulated sense of proportionality, a pattern generally consistent with concerns raised in comparative sentencing studies regarding the coherence of proportionality judgments when courts rely on unarticulated background assumptions rather than explicit doctrinal criteria.¹⁶

The restitution and forfeiture components deserve special attention because their effectiveness depends entirely on the state's institutional capacity to track, freeze, and recover assets associated with the offense. In the cases reviewed, the amount of restitution ordered against members of the legislature was calculated individually based on each member's documented share of the unlawful benefits, reflecting an effort to *individualize punishment* in line with the principle that responsibility for offenses committed collectively should not be uniformly distributed but based on the tangible contributions of each perpetrator¹⁷. This individualization is the real strength of the verdict, as it resists the temptation to impose uniform sanctions on defendants whose actual involvement in the basic scheme differs in scale and function. Nevertheless, the judgments examined in this study do little to discuss how such restitution obligations are then monitored or enforced, which suggests a structural weakness in the transition from judgment to execution, a weakness that becomes even greater when the additional sanctions in question, such as the partial revocation of political rights in the case of the governor, are intended to serve a preventive, not purely financial function.

c. The Gap between Law in Decisions and Laws in Implementation

The main findings of this study are that formal adherence to sentencing procedures, correct application of legal elements, use of legitimate evidence, and adherence to fair legal process do not, by themselves, guarantee that the substance of the verdict is embodied in practice. In all three cases, operative provisions ordering restitution, confiscation, or revocation are clearly stated as they appear, but the verdict itself provides minimal documentation of the monitoring mechanisms of such provisions once the case moves from the courtroom to the executing prosecution authority. These observations reinforce broader concerns that anti-corruption enforcement strategies in Indonesia have historically emphasized the early stages of

¹⁶ Michael P Foran, "The Rule of Good Law: Form, Substance and Fundamental Rights," *The Cambridge Law Journal* 78, no. 3 (2019): 570–95, <https://doi.org/10.1017/S0008197319000618>.

¹⁷ Mahrus Ali, "Suing Contractual Relations as Gratuities and the Issue of Payment of Replacement Money," *Judicial Journal* 15, no. 2 (2022): 247–61, <https://doi.org/10.29123/jy.v15i2.525>.

prosecution and gambling while underinvesting in the institutional infrastructure necessary to track hidden assets and verify the settlement of restitution obligations at the execution stage.¹⁸

The gap between *the law in the decision* and *the law in force* is not merely an administrative shortcoming; it carries a normative significance because *ta'zir*—the purposes of punishment recognized in Islamic criminal law i.e. prevention (*al-zajr wa al-rad'*), moral correction (*al-ishlah*), and restoration of illicit benefits (*radd al-mazalim*) cannot be achieved if the additional sanctions ordered by the court remain unimplemented or are only partially implemented. A judgment that formally fulfills legal certainty but fails to achieve substantive implementation therefore results in what can be termed a *hollow legality*: the appearance of accountability without an underlying moral and restorative content. These concerns are in line with the broader supervisory function expected to be performed by judicial oversight mechanisms over the implementation of court decisions, ensuring that the executing authority does not treat the issuance of administrative documents as equivalent to substantial fulfillment of the operative provisions of the judgment.¹⁹

The absence of a systematic monitoring framework is further exacerbated by the difficulty of tracking assets that have been transferred to third parties, disguised through nominee arrangements, or converted into administratively difficult property forms. In the case of private entrepreneurs, for example, the ruling does not clarify whether benefits transferred to intermediaries related to regional development projects have ever been restored, even though courts have explicitly found that those benefits constitute unlawful outcomes. This pattern illustrates the practical consequences of treating enforcement of corruption as a separate, case-by-case administrative sanction rather than as a systemic accountability mechanism that requires ongoing institutional follow-up, a distinction that is decisive when assessing whether a judgment has actually returned what was unlawfully obtained, rather than simply declaring it illegal.²⁰ Without periodic reporting obligations attached to the executing prosecutor's office, there is no institutional guarantee that the recovery of state assets ordered by the court will actually be completed, nor an external

¹⁸ Ashfa Azkia, "The Problem of Returning State Losses Due to Corruption Crimes through the Asset Forfeiture Mechanism," *Siyasah: Journal of Constitutional Law* 3 (2023): 137–52, <https://doi.org/10.32332/siyasah.v3i1.7231>.

¹⁹ Khunaifi Alhumami, "The Role of Supervisory Judge to Prevent the Discretion in Court Decision Implementation," *Journal of Law and Justice* 7, no. 1 (2018): 45–66, <https://doi.org/10.25216/jhp.7.1.2018.45-66>.

²⁰ Wahyu Dwi Wibowo and Ade Mahmud, "Legal Analysis of Corruption Crimes Abuse of APBDES," in *Bandung Conference Series: Law Studies*, vol. 2, 2022, 1267–74, <https://doi.org/10.29313/bcsls.v2i2.4419>.

mechanism by which the public whose trust has been violated by such violations can verify that restitution has occurred.²¹

This promising path to narrowing the execution gap, which anticipates *ta'zir-based* radd al-mazalim-based goals discussed further below, lies in Indonesia's growing discourse on *non-verdict-based* (NCB) asset confiscation. In contrast to the verdict-based confiscation regime currently used by the Jambi Corruption Court, the NCB mechanism allows the state to pursue illegally acquired property through *in rem* actions directed at the asset itself, rather than criminal action against the person, thereby closing precisely the recovery loophole that arises whenever the perpetrator flees, dies, or hides through a nominee arrangement before enforcement can be completed.²² A recent legal-political analysis of Indonesia's stalled asset forfeiture bill shows that the continued national preference for verdict forfeiture reflects a policy configuration in which punishing the perpetrator, rather than recovering state losses, remains the dominant legislative orientation—a configuration that helps explain why the restitution and forfeiture orders examined in this study do not have a documented mechanism for post-verdict verification. Importantly, this seemingly secular reform proposal finds an independent doctrinal anchor in Islamic legal theory itself: *maqasid-based* principles based on *hifz al-mal* (preservation of lawfully owned wealth), together with the doctrine of *ta'zir bi al-mal* permitting discretionary sanctions directed at illegally acquired property, providing a normative basis for pursuing illegal assets independently of whether or not a personal verdict against the holder can be secured.

²³ Read on the basis of the integrative model proposed in this study, the convergence between NCB confiscation and *hifz al-mal/ta'zir bi al-mal* framework illustrates precisely the synthesis that the dimension of public justice requires: a legal-technical instrument capable of tracking and recovering hidden outcomes is reinforced by independent religious-ethical reasons that treat such restoration as an obligation, not merely discretionary. In this context, restitution is no longer an unsupervised operative clause and becomes an enforceable and doctrinally rooted component in the substantive fulfillment of judgments, which according to this study should be formally incorporated into the institutional mandate of the executing authorities in the Jambi Corruption Court and similar jurisdictions.

²¹ Ade Mahmud, "The Urgency of Progressive Law Enforcement to Restore State Losses in Corruption Crimes," *Legal Issues* 49, no. 3 (2020): 256–71, <https://doi.org/10.14710/mmh.49.3.2020.256-271>.

²² Geza Trisanti Wardani and Satya Graha Habibilah, "Beyond Conviction-Based Forfeiture: Legal Politics and Legislative Directions of Non-Conviction-Based Asset Forfeiture in the Recovery of Corruption Assets in Indonesia," *Istinbath: Jurnal Hukum* 22, no. 02 (2025), <https://doi.org/10.32332/istinbath.v22i02.art08>.

²³ Budi Utama et al., "Islamic Law Analysis of the Prosecutor's Authority in Asset Forfeiture from Corruption," *Al-Ahkam* 35, no. 2 (2025): 313–48, <https://doi.org/10.21580/ahkam.2025.35.2.26343>.

2. Sentence Orientation and Judge's Decision Ratio

a. Judicial Basis and Evidentiary Reasoning

The judicial reasoning (*rasio decidendi*) articulated in the three rulings is firmly rooted in the legal elements of satisfaction: the existence of a benefit, its relation to the recipient's office, and its incompatibility with the recipient's official duties. The judges' evidentiary reasons depend on a combination of direct testimony, documentary evidence, and of note, indirect inferences, in particular the tracking of financial flows and the correlation between the timing of the benefit and the subsequent official decision. This reliance on indirect reasoning and inference is not surprising given the well-established difficulties of proof. *reciprocal* arrangements in corruption cases that have no explicit record of transactions, and this reflects a broader pattern in which courts must construct a probabilistic narrative of fragmented evidence rather than prove bribery through direct evidence of intent.²⁴

Although the evidentiary reasoning in such judgments is methodologically plausible in a positive legal framework, it is almost entirely oriented towards establishing the *facts* of satisfaction rather than exploring *moral gravity*. Judges consistently ask whether a benefit is acceptable and whether it is related to an office, but they do not systematically ask how the receipt of such a benefit changes the relationship of trust between the official and the community that the office is supposed to serve. This focus on selective proof results in a form of reasoning that is legally sufficient but morally thin; a thin pattern consistent with the broader observation that adjudicative reasoning tends to lean toward the considerations that are most easily processed in court, even when other considerations are more directly related to the substantive error being addressed.²⁵ In all three rulings, for example, courts explicitly considered how the emergence or duration of a beneficiary relationship different from their mere existence should affect the degree of seriousness of the offense assessed, even though such a pattern-based investigation would more accurately capture the systemic character of a corrupt exchange than an analysis of a single transaction.

b. Philosophical and Sociological Considerations

Beyond the strict juridical dimension, verdicts sometimes lead to philosophical and sociological considerations, especially when addressing the erosion of public trust

²⁴ Daron Acemoglu and Alexander Wolitzky, "A Theory of Equality before the Law," *The Economic Journal* 131, no. 636 (2021): 1429–65, <https://doi.org/10.1093/ej/ueaa116>.

²⁵ Sebastian Lewis, "Precedent and the Rule of Law," *Oxford Journal of Legal Studies* 41, no. 4 (2021): 873–98, <https://doi.org/10.1093/ojls/gqab007>.

and the symbolic function of punishing corrupt officials. In cases involving provincial governors, courts recognize that the defendant's position as a symbol of local government magnifies the social harm of the offense; however, this recognition serves more as a contextual coloring than as an operative element that constitutes the calculation of the length of the sentence. Similarly, in the case of legislators, the court's brief reference to the betrayal of constituents' trust most evident in the partial revocation of political rights indicates an emerging awareness of the political dimension of complacency, yet this awareness has not developed into a systematic doctrine that links the *level* of public trust betrayed to *the* appropriate level of punishment.

This pattern reflects a broader tension between the concepts of formal and substantive legality in the courts: even when the court's formal reasoning appears to be internally consistent, the substantive values that the rule of law is supposed to protect, including the protection of citizens from the arbitrary conversion of public power into private gain, may remain less articulated unless judges deliberately outline their implications for sentencing.²⁶ The judgments examined in this study illustrate this tension appropriately: they are formally coherent, yet the deeper sociological and philosophical stakes of satisfaction are only briefly acknowledged and not incorporated into the operative logic of punishment. As a result, *the symbolic* function that punishment is intended to signal to the broader bureaucracy that abuses of public authority carries serious consequences is largely left implicit rather than reinforced through explicit judicial articulation, thus undermining the general deterrent value that more detailed reasoning could provide.

c. Judicial Reasoning Pattern

Three recurring patterns can be identified across the ratio decidendi of the three judgments: *judicial rationality*, in which reasoning is dominated by legal subsumptions; *differentiated punishment*, in which the position and rank of the offender clearly, but not explicitly, affect the severity of the sanction; and *partial integration*, in which moral, social, and institutional considerations are mentioned but not systematically included in the punishment calculus. Table 2 summarizes how these three patterns manifest across the cases studied.

Table 2. Judicial Reasoning Patterns Identified in Three Satisfaction Decisions

²⁶ Konatsu Nishigai, "Two Types of Formalism of the Rule of Law," *Oxford Journal of Legal Studies* 42, no. 2 (2022): 495–520, <https://doi.org/10.1093/ojls/gqab039>.

Pattern	Manifestations in the Case of Regional Heads	Manifestations in the Case of Private Actors	Manifestations in the Case of Legislative Members
Juridical Rationality	Emphasis on evidence of office– benefit relationship	Emphasis on evidence of the giver–recipient relationship	Emphasis on evidence of collective participation (<i>deelneming</i>)
Differentiated punishment	Heavier sanctions implicitly related to executive ranks	Sanctions calibrated with the economic benefits obtained	Individual restitution that reflects different roles
Partial integration of the moral/social considerations	Brief mention of the damage to public trust	Most are absent	Brief mention of the mandate of the betrayed constituents

The table illustrates that although the three rulings share a common juridical backbone, the extent to which moral and sociological dimensions are integrated into sentencing varies according to the visibility of the executive and legislative positions involved accepting a slightly more explicit moral framework than the behavior of private actors, although the role of private actors as active facilitators of corrupt exchanges arguably carries comparable social harms. This asymmetry suggests that judicial attention to *the morality* dimension of satisfaction is currently fueled by the symbolic superiority of an office rather than by consistent doctrinal principles that apply to all parties in corrupt exchanges, a concern that resonates with a broader analysis of how different legal treatment can emerge from institutional visibility rather than from stable, generalizable rules.²⁷ Because the liability of the private actor is assessed almost exclusively through the economic lens of the value of the benefits transferred rather than through a parallel investigation of the trusts he or she helps to damage, the resulting asymmetry risks underestimating the seriousness of the demand-side behavior that underpins the satisfaction network in the first place.

²⁷ Anshar Anshar and Suwito Suwito, "Infra Petita Court Decision on Corruption Crimes That Break Through the Provisions of Minimum Criminal Punishment," *Judicial Journal* 11, no. 2 (2018): 151–70, <https://doi.org/10.29123/jy.v11i2.272>.

d. Strengths and Limitations of the Decidendi Ratio

The main strength of the judicial reasoning examined in this study lies in its methodological consistency: each judgment systematically traces the elements of satisfaction governed by the statute, evaluates the available evidence against those elements, and reaches a legally defensible conclusion of wrongdoing. This consistency contributes to *legal certainty* and helps ensure that cases with similar structures are decided through a process of comparable analysis, thereby supporting the broader institutional goal of predictable and rule-bound judgment.

However, a key limitation is that this same consistency operates largely at the level of *form* rather than *substance*. The reasons the judges rarely address the deeper question of why a betrayal of public trust by a high-ranking official should be treated more morally harshly than an equivalent violation of the law committed by a civilian without a public mandate. Nor does this reason systematically explore whether the outcome of a sentence achieves the basic goal of deterrence of punishment, moral correction, and restoration or simply satisfies the formal requirement that sanctions be imposed. This limitation is consequential because the purely formalistic ratio of decidendi risks producing a verdict that is internally coherent but substantially separate from the social harm that the crime of satisfaction should remedy, a concern that echoes the prudence of broader jurisprudence not to allow adjudicative reasoning to collapse into the application of the rule without sustained engagement with the values that the rule is supposed to serve. This limitation becomes most apparent when the analysis moves, as it does below, from the register of positive law to the register of Islamic criminal law, where the concept of *trust* provides a precisely substantive vocabulary that is not explored by the formal reasons for the judgment.

3. Evaluation through the Lens of Jinayah Fiqh and the Development of Integrative Models

a. Satisfaction as Amanah, Risywah, Hadiyyat al-'Ummal, and Ghulul

When viewed through the framework of Islamic criminal law, the three judgments examined in this study reveal a normative dimension that is not fully captured by positive law alone: the treatment of public office as *a trust*, a trust that must be exercised for the benefit of society, not exploited for personal gain. This principle finds its most obvious scriptural basis in Q.S. *An-Nisa* [4]:58:

إِنَّ اللَّهَ يَأْمُرُكُمْ أَنْ تُؤَدُّوا الْأَمَانَاتِ إِلَىٰ أَهْلِهَا وَإِذَا حَكَمْتُمْ بَيْنَ النَّاسِ أَنْ تَحْكُمُوا بِالْعَدْلِ ۚ إِنَّ اللَّهَ نِعِمَّا يَعِظُكُمْ بِهِ ۗ إِنَّ اللَّهَ كَانَ سَمِيعًا بَصِيرًا

"Indeed, Allah commands you to entrust to those who are entitled and, when you judge between men, judge justly. The Most High is what Allah commands you. Indeed, Allah is All-Hearing and Seeing."

Classical and contemporary exegetes read this verse as establishing a general obligation applicable to anyone who is given authority over the affairs of others, which goes beyond its original historical context to include the exercise of public office in which power is held in the interests of the community it serves, not the opposite. The exegetical tradition surrounding this verse emphasizes two inseparable commands: the return of the trust to its rightful holder and the enforcement of justice in judgment, as well as treating it as two dimensions of a single obligation that binds whoever exercises authority over the affairs of others. If applied to the cases discussed, this verse shows that the *authority exercised* by the governor, the legislators, and indirectly, through the facilitation of official decision-making to private entrepreneurs, is a trust whose abuse constitutes an independent moral offense, albeit reinforced by, its criminal-legal characterization.

The concept of *risywah* (bribery) provides the most direct analytical bridge between satisfaction and Islamic criminal law. Q.S. *Al-Baqarah* [2]:188 states:

وَلَا تَأْكُلُوا أَمْوَالَكُمْ بَيْنَكُمْ بِالْبَاطِلِ وَتَذْلُوا بِهَا إِلَى الْحُكَّامِ لِتَأْكُلُوا فَرِيقًا مِّنْ أَمْوَالِ النَّاسِ بِالْإِثْمِ وَأَنْتُمْ تَعْلَمُونَ

"And do not spend one another's wealth unjustly or send it to rulers so that you may spend some of the wealth of the people in sin, while you know [it is not valid]."

The exegetical tradition interprets this verse as going beyond the literal act of bribing judges to include the use of material incentives aimed at distorting the exercise of an official's discretion, placing the blame not only on the transfer of wealth itself but also on the manipulation of decision-making authority that should be exercised fairly, a reading that directly applies to the pattern observed in the cases of governors and legislators, where benefits are structured to correspond to, and possibly to influence, decisions over public infrastructure and budget allocations. This reading is reinforced by a hadith in which the Prophet Muhammad (peace be upon him) is reported to have said:

لَعَنَ اللَّهُ الرَّاشِيَّ وَالْمُرْتَشِيَّ وَالرَّائِشَ بَيْنَهُمَا

"Allah has condemned those who offer bribes, those who accept them, and those who act as intermediaries between them."

This hadith reinforces the Qur'an's prohibition by treating corrupt exchanges as a collective moral failure involving all parties to the transaction, not just the beneficiaries, a framework that is very much in line with the court's treatment of private entrepreneurs as criminally responsible along with the officials who receive the benefits.

Complementing the *risywah* is the concept of *hadiyyat al-'ummal*, a gift received by officials for their position. The normative basis for this concept is taken from a famous hadith about a zakat collector, Ibn al-Lutbiyyah, which is recorded as follows:

مَا بَالُ الْعَامِلِ نَبَعْتُهُ فَيَأْتِي فَيَقُولُ هَذَا لَكُمْ وَهَذَا أُهْدِيَ لِي، أَفَلَا جَلَسَ فِي بَيْتِ أَبِيهِ وَأُمِّهِ فَيَنْتَظِرُ أَيُّهُدَى لَهُ أَمْ لَا

"What happened to an official we appointed to the task, who then came and said, 'This is for you [the state treasury] and this is given to me as a gift'? Why doesn't he just stay at his father and mother's house and see if he will be given a gift or not?"

This hadith establishes a counterfactual test to distinguish a legitimate personal gift from an invalid benefit dependent on office: the gift is invalid because it would not be given if the recipient did not occupy his official position. Applying this counterfactual test to the case of the governor, it is clear that the benefit received is related to the authority of his governor rather than a personal relationship independent of the office, thus meeting the criteria that make *hadiyyat al-'ummal al-muharramah* a forbidden gift for an official.

Finally, the concept of *ghulul*, which originally referred to the misuse of common property, but was later extended in doctrinal use to the violation of public trust for personal gain, was directly addressed by Q.S. *Ali 'Imran* [3]:161:

وَمَا كَانَ لِنَبِيٍّ أَنْ يَغُلَّ وَمن يَغُلْ يَأْتِ بِمَا غُلَّ يَوْمَ الْقِيَمَةِ ثُمَّ تُوَفَّى كُلُّ نَفْسٍ مَّا كَسَبَتْ وَهُمْ لَا يُظْلَمُونَ

"It is not the right of the prophet to betray [in the matter of spoils of war]. And whoever betrays him will take what he has betrayed on the Day of Resurrection. Then every soul will be fully recompensed for what he has earned, and they will not be wronged."

The exegetical commentary treats this passage as a general condemnation of the abuse of what has been entrusted to communal or public supervision, placing such

behavior as a fault for which the perpetrator will ultimately be held accountable, thus extending the relevance of this concept far beyond its narrow initial historical setting to the modern state in which positions of public trust are exploited for undue personal gain. Taken together, these scriptural sources place satisfaction not as a narrow violation of technical law, but as a multidimensional moral error that touches *on trust, risywah*, and *ghulul* simultaneously a conclusion that is in line with the emphasis of contemporary Islamic law studies that modern corruption violations cannot be reduced to a single classical category, but must be evaluated on the basis of the substantial character of the behavior involved.²⁸

b. Satisfaction as Jarimah Ta'zir: The Purpose of Punishment

Since satisfaction is not given a fixed *punishment of hadd* or *qisas* in the primary source, this is included in the category of *jarimah ta'zir*, a violation whose sanction is left to the policy of the state authority (*ulil amri*) in accordance with the demands of community welfare (*maslahah*). This classification provides great flexibility of interpretation, but it also imposes corresponding responsibilities: since the form and severity of the punishment of *ta'zir* are not established in text, the legitimacy of the sanctions depends on their demonstrable relevance to recognized purposes such as prevention (*al-zajr wa al-rad'*), moral correction (*al-ishlah*), protection of the communal order (*hifz al-nizam al-'amm*), and restoration of wrongfully obtained benefits (*radd al-mazalim*).

This principle is further reinforced by a hadith often quoted in discussions about the moral weight attached to holding public authority, in which the Prophet Muhammad (peace be upon him) is reported to have said:

كُلُّكُمْ رَاعٍ وَكُلُّكُمْ مَسْئُولٌ عَنْ رَعِيَّتِهِ

"Each of you is a shepherd, and each one is responsible for his flock."

This hadith places every position of authority, no matter how small or high, in relation to accountability to those under its supervision, and it is on this basis that classical jurists distinguish the moral weight of an official's offense from that of an ordinary personal criminal: the fault of an official is aggravated by the specific

²⁸ Moh Thamsir, Mukhtar Latif, and Pauzi Muhammad, "Islamic Criminal Law Reform in Corruption Cases: Maqasid Al-Shariah Perspective," *Journal of Ius Constituendum* 10, no. 1 (2025): 16–27, <https://doi.org/10.26623/jic.v10i1.10932>.

relationship of trust that his office is supposed to embody, a relationship that is not possessed by civilians who act alone in the same way.

If measured against these objectives, the sentences handed down in the three judgments examined in this study can be said to partially meet *the ta'zir* Framework: Imprisonment and fines correspond to the dimensions of prevention and retribution, while restitution orders correspond to the dimensions of restoration. However, the dimension of moral correction that in Islamic criminal law is not only directed at punishing individual perpetrators but also at restoring the ethical relationship between power holders and society is still largely not discussed in the operational reasons for the verdicts. These findings are consistent with contemporary studies of corruption punishment reform from a *maqaid al-sharia* perspective, which argues that sanctions calibrated purely on legal elements risk ignoring the function of the deeper purpose that Islamic criminal law expects from punishment, namely the restoration of mutual trust and the prevention of systemic institutional damage, rather than simply correction of isolated individual wrongdoing.²⁹

The principle of proportionality embedded in *ta'zir* further suggests that the severity of punishment should take into account not only the nominal value of the satisfaction received, but also the extent to which the perpetrator's position reinforces the outcome of *the mafsadah*, or social disadvantage. Contemporary treatment of corruption punishment in the study of Islamic criminal law also holds that the severity of punishment should be attributed to the level of authority of officials and the appropriate scale of institutional damage, not just to the monetary value of the benefit alone³⁰. By applying this standard to the cases under review, the governor's violations given the scope of authority inherent in his office and his symbolic centrality in regional governance may merit a more explicit moral exaggeration in the court's reasoning than actually expressed, even though the punishments formally imposed are relatively severe.

c. The Integration of Moral-Religious Reasoning That Has Not Yet Materialized

Although there is a clear conceptual resonance between the crime of satisfaction examined in this study and the categories of *risywah*, *hadiyyat al-'ummal*, and *ghulul*, the verdict itself does not contain explicit involvement with the framework. This absence is not surprising given that Indonesia's positive law does not require judges to use religious sources in prosecuting corruption cases; However, it

²⁹ Nishigai, "Two Types of Formalism of the Rule of Law."

³⁰ Saifudin Saifudin, "Punishment of Corruption in the Perspective of Islamic Criminal Law," *J-CEKI: Journal of Scientific Scholars* 4, no. 3 (2025): 2784–88, <https://doi.org/10.56799/jceki.v4i3.8899>.

also means that the moral force embedded in these concepts, particularly the idea that betrayal of *trust* is a form of accountability that goes beyond direct legal consequences, remains untapped as a resource to strengthen the persuasive and educational function of judicial reasoning.

This gap is in line with a broader methodological debate in comparative legal theory about the relationship between formal legal categories and the substantive objectives that they seek to serve. Just as studies of legal formality in economic regulation warn that over-reliance on rule-based categorization can obscure the basic purpose that the rule seeks to protect,³¹ the rulings discussed here illustrate a similar risk in the context of criminal law: strict adherence to the element of satisfaction regulated by law, without intentional engagement with the moral-religious vocabulary available in Muslim-majority Indonesian legal culture, results in a verdict that is formally defensible but abandons a deeper communicative function in the form of punishment as a signal that mistrust is a betrayal of state and relatively underdeveloped communal trust.

These findings reinforce the argument, which is further developed below, that the execution and determination of satisfaction cases would benefit from a more deliberate synthesis between procedural safeguards of the rule of law and a substantial vocabulary centered on belief in Islamic criminal law, rather than treating the two as separate, non-communicative normative registers. Such synthesis does not have to sacrifice the secular character of Indonesia's positive criminal law; rather, it can serve as a source of interpretation that judges can use when articulating the moral seriousness of a breach of *trust* by the defendant, without replacing the legal elements that remain the formal basis of criminal liability.

d. Towards an Integrative Model of Legal Justice, Moral Justice, and Public Justice

The cumulative findings of this study that include the execution of judgments, judges' reasoning, and the moral-religious dimension of satisfaction converge on the conclusion that formal adherence to the rule of law, while necessary, is not sufficient to achieve substantive justice in cases of satisfaction satisfaction. Based on the theoretical premise that *the rule of law* serves as a restriction on arbitrary power, rather than a guarantee of substantive justice itself,³² and draws from *the maqasid-proposals* of reform oriented to the study of contemporary Islamic criminal law,³³ this study

³¹ Justin Lindeboom, "Formalism in Competition Law," *Journal of Competition Law & Economics* 18, no. 4 (2022): 832–80, <https://doi.org/10.1093/joclec/nhac003>.

³² Acemoglu and Wolitzky, "A Theory of Equality before the Law."

³³ Thamsir, Latif, and Muhammad, "Islamic Criminal Law Reform in Corruption Cases: Maqasid Al-Shariah Perspective."

proposes an integrative model consisting of three complementary dimensions of justice, as summarized in Table 3.

Table 3. *Proposed Integrative Model for the Implementation of Satisfaction Decisions*

Dimensions	Core Principles	Main Frame of Reference	Practical Implications for Judicial Reasoning and Implementation
Legal Justice	Legality, sufficiency of evidence, equality before the law, fair legal process	Rule of law; sentencing procedures	Judges maintain a rigorous analysis of subsumption and evidence
Moral Justice	Position as <i>a trust</i> ; the degree of betrayal of trust is proportional to rank and authority	<i>Risywah, ghulul, hadiyyat al-'ummah, ta'zir</i>	The reason for the verdict explicitly included the level of trust betrayed as an incriminating consideration
Public Justice	Restoration of community trust; prevention of systemic relapse	<i>Maslahah</i> ; Restorative and preventive purposes of <i>Ta'zir</i>	Implementation mechanisms are monitored and reported to demonstrate the actual recovery of invalid benefits

As illustrated by Table 3, the *legal justice* dimension corresponds to what has already been achieved quite well by the three rulings: rigorous and evidence-based legal reasoning consistent with fair legal process. The *moral justice* dimension In contrast, the dimension is a major area in need of reform, as no ruling systematically translates *the mandate-aggravating associated with high office into an explicit punitive factor, despite the clear doctrinal basis in both* Foran's comparative punishment theories and Islamic criminal law.³⁴³⁵ The *public justice* dimension, finally, addresses the implementation gaps that have been identified earlier in this study: without a transparent and monitored mechanism to verify that restitution and confiscation orders are actually met, the restorative promise of *ta'zir* *Punishment-based punishment remains aspirational rather than realized.*³⁶³⁷

³⁴ Saifudin, "Punishment of Corruption in the Perspective of Islamic Criminal Law."

³⁵ Foran, "The Rule of Good Law: Form, Substance and Fundamental Rights."

³⁶ Azkia, "The Problem of Returning State Losses Due to Corruption Crimes through the Asset Forfeiture Mechanism."

³⁷ Wibowo and Mahmud, "Legal Analysis of Corruption Crimes Abuse of APBDES."

These three dimensions are not intended to operate in isolation but reinforce each other sequentially: legal justice establishes the procedural legitimacy necessary for a judgment to have institutional authority; moral justice provides a substantial vocabulary that links such authority to the ethical seriousness of betraying trust; and public justice ensures that the restorative and preventive promises of the judgment are executed to completion, not left as an unexecuted operational provision. Judgments that only meet the first dimension risk producing formally legitimate results but are substantially empty; judgments that only meet the second dimension risk memorization without procedural discipline; and systems that ignore the third risk reducing even well-reasoned judgments to symbolic gestures without real accountability.

Overall, these findings suggest that the determination and implementation of satisfaction judgments in the Jambi Corruption Court, while procedurally sound, will be substantially strengthened by a deliberate shift from *the paradigm of individual punishment* to one of *integrative justice* in which positive legal rigor is maintained, the moral weight of betrayed public trust is explicitly explained rather than simply directed, and the execution of court orders is treated as a responsible and monitored process, rather than a terminal administrative action. This integrative reorientation, which is based simultaneously on the belief-centered procedural discipline of the rule of law and Islamic criminal ethics, offers a more normatively rich framework within which the determination of future justice of satisfaction in Jambi and beyond can more fully embody substantive justice that cannot be guaranteed by formal legality alone.

CONCLUSION

This study aims to examine how the satisfaction verdicts issued by the Jambi Corruption Court are implemented, how *the judicial ratio decidendi* formulates punishments for the violations, and how *the jinayah fiqh* perspective can be used to evaluate and strengthen the process. The findings show that the three analyzed judgments meet the formal requirements of the rule of law, including legality, sufficiency of evidence, and fair procedural process; However, its implementation shows a persistent gap between *the law in the decision* and *the law in the execution*, since the restitution and confiscation order does not have a transparent and monitored mechanism capable of verifying that the unlawfully obtained benefits have actually been obtained. With regard to judicial reasoning, courts have consistently established the elements of satisfaction under the law through a sound but largely formalistic methodological analysis, which verifies the existence of a benefit and its relation to the office without systematically weighing *the moral weight* of betraying the trust given by

the office; this results in punitive outcomes that distinguish perpetrators based on institutional visibility, rather than on the explicit and generalizable doctrine of proportional error. When viewed through *fiqh jinayah*, satisfaction emerges as a multidimensional violation of trust, which resonates with the classical categories of *risywah*, *hadiyyat al-'ummal*, and *ghulul*, and is appropriately classified as *jarimah ta'zir*, whose legitimacy depends on a demonstrable relationship with the prevention, moral correction, and restoration of the purpose of wrongly obtained benefits that are only partially fulfilled by the verdicts examined in this study.

Based on this, the study concludes that formal adherence to positive law, while necessary, is not enough to guarantee substantive justice in the assessment of satisfaction. Therefore, the study proposes an integrative model consisting of three interrelated dimensions: *legal justice*, which is rooted in the procedural rigor already achieved by the courts; *moral justice*, which requires judges to translate breach of trust into explicit and sensitive ballast factors to a high degree; and *public justice*, which demands responsible and monitored implementation of restitution and confiscation orders. This model answers the study's key question by showing that *the rule of law* and Islamic criminal law do not have to operate as separate normative registers but can be synthesized into a coherent framework capable of bringing the enforcement of satisfaction beyond formal legality to a concept of justice that is grounded in substance and restores trust, with implications that go beyond the Jambi Corruption Court to a broader architecture within the anti-corruption courts in Indonesia.

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