

## JURIDICAL REVIEW OF VISUM ET REPERTUM AS EVIDENCE IN RAPE CASES INVOLVING MARRIED VICTIMS

### ANÁLISE JURÍDICA DO RELATÓRIO MÉDICO-LEGAL COMO PROVA EM CASOS DE ESTUPRO ENVOLVENDO VÍTIMAS CASADAS

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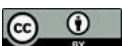
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#### Abstract

Sexual violence cases, particularly rape involving married women, often present complex evidentiary challenges due to the dominance of psychological coercion and the limited availability of visible physical injuries. In such cases, Visum et Repertum (VeR) plays a crucial role as medicolegal evidence to support the criminal justice process. This study aims to analyze the legal status and evidentiary strength of VeR as a means of proof in rape cases involving married victims, as well as to examine its judicial application in Decision Number 21/Pid.Sus/2025/PN Bjw. This research employs a qualitative method with a normative juridical and literature study approach, analyzing statutory regulations, doctrines of criminal evidence, medicolegal standards, and court decisions. The results indicate that VeR holds a strong evidentiary position as both documentary evidence and expert opinion, enabling judges to verify forced penetration, assess the consistency of the victim's testimony, and establish the element of coercion, even in the absence of prominent physical injuries. However, the findings also reveal inconsistencies in judicial interpretation, particularly when psychological pressure outweighs physical violence. Therefore,

#### Resumo

*Os casos de violência sexual, particularmente os de estupro envolvendo mulheres casadas, frequentemente apresentam desafios probatórios complexos devido ao predomínio da coerção psicológica e à disponibilidade limitada de lesões físicas visíveis. Nesses casos, o Visum et Repertum (VeR) desempenha um papel crucial como prova médico-legal para apoiar o processo de justiça criminal. Este estudo tem como objetivo analisar o status jurídico e o valor probatório do VeR como meio de prova em casos de estupro envolvendo vítimas casadas, bem como examinar sua aplicação judicial na Decisão nº 21/Pid.Sus/2025/PN Bjw. Esta pesquisa emprega um método qualitativo com uma abordagem de estudo jurídico-normativo e bibliográfico, analisando regulamentações estatutárias, doutrinas de prova penal, padrões médico-legais e decisões judiciais. Os resultados indicam que a VeR detém uma forte posição probatória tanto como prova documental quanto como parecer pericial, permitindo aos juízes verificar a penetração forçada, avaliar a consistência do depoimento da vítima e estabelecer o elemento de coação, mesmo na ausência de lesões físicas evidentes. No entanto, os resultados também revelam*



the study highlights the need for strengthened legal interpretation, harmonized medicolegal guidelines, and improved capacity of law enforcement officials to ensure the optimal use of VeR in sexual violence cases. The main legal contribution of this study lies in clarifying the doctrinal position of VeR as a scientific evidentiary instrument capable of bridging medical findings with the legal construction of sexual violence under the Indonesian criminal justice system. Practically, these findings highlight the need for clearer interpretative guidelines and improved capacity of investigators, prosecutors, and judges in understanding medicolegal evidence to ensure the optimal use of VeR in sexual violence cases.

**Keywords:** Evidence. Law of Proof. Marital Victim. Rape. Visum Et Repertum.

*inconsistências na interpretação judicial, particularmente quando a pressão psicológica supera a violência física. Portanto, o estudo destaca a necessidade de uma interpretação jurídica reforçada, diretrizes médico-legais harmonizadas e maior capacitação dos agentes da lei para garantir o uso ideal da VeR em casos de violência sexual. A principal contribuição jurídica deste estudo reside no esclarecimento da posição doutrinária da VeR como um instrumento probatório científico capaz de fazer a ponte entre os achados médicos e a construção jurídica da violência sexual no âmbito do sistema de justiça criminal indonésio. Na prática, essas conclusões destacam a necessidade de diretrizes interpretativas mais claras e de maior capacitação de investigadores, promotores e juízes na compreensão das evidências médico-legais, a fim de garantir o uso ideal do VeR em casos de violência sexual.*

**Palavras-chave:** Evidência. Direito da Prova. Vítima Conjugal. Estupro. Visum Et Repertum.

## 1 INTRODUCTION

Rape as a criminal act is one of the most complex crimes in terms of evidence, especially when the act involves deception, indirect threats, or situational manipulations that force the victim into a powerless position. This complexity is further heightened when the victim is married, as there is often a misconception that married victims find it more difficult to prove coercion or sexual violence. In the Indonesian criminal justice system, Visum et Repertum (VeR) plays an essential role as a documentary piece of evidence that provides an objective depiction of the physical and sexual violence experienced by the victim. This aligns with Lukow's view that VeR is a documentary tool with primary evidentiary strength in cases involving the human body (Mnookin & Ristovska, 2023). Therefore, examining the role and evidentiary strength of VeR is crucial, particularly in cases involving adult married victims of rape, as the proof of coercion often depends on medical evidence. (Lukow et al., 2021)

This study focuses on a rape case involving a married victim, as outlined in Decision Number 21/Pid.Sus/2025/PN Bju, where the defendant, Yosep Goru Nay,

subjected the victim, Eri Meriah, to sexual violence (Vallmuur et al., 2021). According to the case file, the victim experienced sexual violence after the defendant fabricated a threat scenario through a separate phone number, he operated himself. These threats then forced the victim to engage in sexual acts under psychological pressure, culminating in forced intercourse in several locations, including the victim's home and school office. These incidents were further substantiated by Verification Report Number KUM.011.5/18/5/2024, which describes a hymenal tear in several directions, a laceration to the vaginal wall, and a hematoma on the victim's hip, indicating blunt force trauma consistent with the victim's narrative. In this context, Verification Report functions as objective evidence to strengthen the correspondence between injuries and the chronology of events.

In criminal law studies, the existence of VeR as evidence is crucial to ensure the fulfillment of the elements of violence, coercion, or the victim's helplessness, as required by Law Number 12 of 2022 concerning Sexual Violence Crimes (TPKS) (Hairi & Latifah, 2023). VeR serves as evidence capable of confirming medical facts, thereby bridging the gap between the victim's testimony and the legal construction of the crime of sexual violence (Widagdo & Yusuf, 2024). In this case, the victim was not only under duress but also suffered physical injuries that would not have occurred without the defendant's violent actions. Therefore, VeR serves as corroborating evidence that strengthens the validity of the victim's testimony, especially when the violence was committed in a closed room without direct witnesses. In addition to supporting the evidence of violence, the VeR also plays a crucial role in confirming the causal relationship between the defendant's actions and the physical impacts experienced by the victim. The VeR is not merely medical administration but also constitutes undeniable scientific evidence in proving the crime of rape (Nasarudin & Arafat, 2023). In Decision No. 21/Pid.Sus/2025/PN Bju, the Panel of Judges explicitly considered the VeR as one of the primary pieces of evidence demonstrating that the victim's injuries were the result of repeated acts of sexual violence. The presence of hymenal tears in multiple directions, lacerations, and hematomas also indicate that the sexual intercourse was not voluntary but rather involved physical coercion.

The VeR in this case does not stand alone but is analyzed in conjunction with the victim's testimony, electronic evidence in the form of WhatsApp conversations, and the

defendant's indirect confession. A strong VeR must be read systematically with other evidence to provide a comprehensive picture of the act (Nurmayanti & Yusuf, 2025). When the defendant's fabricated threats and manipulative methods are analyzed alongside the physical findings in the VeR, a clear pattern of psychological and physical coercion that placed the victim in a helpless position is evident.

Thus, the evidence in this case does not solely rely on the VeR, but rather the VeR serves as the main pillar that binds the consistency of the entire evidence. Beyond the technical evidentiary aspect, the use of the VeR is also related to legal protection for victims. Victims of sexual violence, including those with disabilities and adult women, require an evidentiary mechanism that does not unduly burden them (Astuti & Setiautami, 2025). In this case, the VeR provides this form of protection, as the victim does not need to prove all the details of the psychologically severe incident; it is sufficient to prove injuries resulting from coercion. In the ruling, the Panel of Judges also emphasized that medical evidence demonstrates physical trauma that would not have occurred without the defendant's violent actions, thus the VeR also serves to protect the victim's dignity during the trial.

Several previous studies have examined the role of *Visum et Repertum* (VeR) in the evidentiary process of criminal cases, particularly in cases of sexual violence. (Mamuaja et al., 2023) emphasize that VeR holds the status of documentary evidence with significant probative value because it is based on objective medical expertise. The study by (Natalie & Darma, 2023) also shows that VeR functions as a bridge between medical facts and legal construction in proving elements of sexual violence in court. In addition, (Sumino & Pramono, 2023) highlight that VeR can strengthen the victim's testimony and assist judges in assessing the existence of forced penetration in rape cases. Nevertheless, most of these studies primarily focus on the normative position of VeR as a form of evidence or on its general role within the criminal evidentiary system. Studies that specifically analyze how VeR is interpreted and applied by judges in concrete judicial decisions, particularly in rape cases involving married victims and elements of psychological coercion, remain relatively limited.

Based on this gap, this research offers a specific contribution by analyzing the juridical position and evidentiary strength of VeR through an in-depth examination of Decision Number 21/Pid.Sus/2025/PN Bju. The novelty of this study lies in its integrated

analysis of VeR not only as medical documentation but also as a legal instrument that connects scientific findings, the victim's narrative, and judicial considerations in proving rape involving married victims. By focusing on the judicial interpretation of VeR within a concrete case, this study provides a clearer understanding of how medical evidence is operationalized in the process of establishing criminal responsibility.

Based on this description, this research is important to understand how the judge uses the VeR's evidentiary position and strength in deciding cases of sexual violence cases against married victims, using a case study of Decision Number 21/Pid.Sus/2025/PN Bju. The focus of this study includes: (1) the evidentiary strength of VeR in proving the elements of rape, and (2) the implementation of VeR in judicial practice through an analysis of the Panel of Judges' considerations. This study aims to provide an understanding of how VeR functions not only as medical evidence but also as a legal instrument that determines the direction of decisions and ensures justice for victims, as emphasized in the literature on the relationship between medical evidence and legal legitimacy in sexual violence cases.

## 2 RESEARCH METHODS

This study employs normative legal research, also known as doctrinal legal research, which focuses on the analysis of legal norms, principles, and doctrines derived from written legal materials (Bhaghamma, 2023; Rifa'i, 2023). Normative legal research is conducted through the systematic examination of secondary legal sources relevant to the legal issues under investigation, including statutory regulations, legal doctrines, scholarly literature, and court decisions. This approach is appropriate for analyzing the juridical position and evidentiary strength of *Visum et Repertum* (VeR) in rape cases involving married victims within the Indonesian criminal justice system.

The research utilizes two primary analytical approaches: the statutory approach and the conceptual approach. The statutory approach examines relevant legal provisions governing the evidentiary role of VeR, particularly those contained in the Indonesian Criminal Procedure Code (KUHAP), the Law on Sexual Violence Crimes (UU TPKS), and related medico-legal regulations. Meanwhile, the conceptual approach is used to analyze legal doctrines and theoretical perspectives concerning criminal evidence,

medico-legal documentation, and the relationship between medical expertise and judicial reasoning in criminal adjudication.

In addition to these approaches, this research also applies a case analysis of Decision Number 21/Pid.Sus/2025/PN Bju as the primary empirical reference within the doctrinal framework. The court decision was examined through qualitative legal analysis by reviewing the structure of judicial reasoning, including the judge's assessment of evidence, the interpretation of medical findings contained in the *Visum et Repertum*, and the relationship between the VeR, the victim's testimony, and other supporting evidence. This analysis aims to understand how VeR is interpreted and operationalized by judges in determining the fulfillment of the legal elements of rape.

The selection of doctrinal sources was conducted through a literature review of academic publications, legal journals, and scholarly works discussing criminal evidence and medico-legal documentation. Priority was given to peer-reviewed journal articles, authoritative legal commentaries, and studies specifically addressing the evidentiary role of VeR and the adjudication of sexual violence cases. These doctrinal materials were analyzed systematically to identify prevailing legal interpretations and to provide a theoretical foundation for evaluating the judicial application of VeR in the analyzed court decision.

### **3 RESULTS AND DISCUSSION**

#### **3.1 The evidentiary strength of visum et repertum in rape cases involving married victims**

VeR holds a central position in proving rape, especially in cases involving married victims. In Case No. 21/Pid.Sus/2025/PN Bju, VeR is used to confirm, objectively, the occurrence of sexual violence through findings of injuries on the victim's reproductive organs. Based on the decision documents, the court noted that the VeR report showed hymen tears, vaginal lacerations, and hematomas on the right hip and buttocks caused by blunt force trauma. These medical findings, contained in VeR No. KUM.011.5/18/5/2024, were signed by Dr. Putu Pradnya Paramitha Dewi, Sp.OG, confirming that these injuries were consistent with sexual violence. This corroborated the

victim's testimony about coercion, even though the rape was carried out through psychological threats and manipulation.

In cases where the victim is married, the use of VeR becomes significant to prove that the sexual intercourse was not consensual marital sex, but rather violence committed by someone other than the victim's spouse. This is evident in the decision where the court emphasized that the victim did not have a marital relationship with the defendant, fulfilling the "outside of marriage" element. Therefore, VeR serves as an objective marker that forced penetration occurred, based on the physical injuries found. In proving sexual violence, VeR can fill the gap in evidence when the acts occur without direct witnesses, as the presence of injuries can demonstrate coercion and unwillingness. (Sukrisno & Triadi, 2025)

The chronology of events in the verdict indicates that the defendant committed forced sexual acts on May 1, 2024, in the victim's office, and twice more on May 2, 2024, in the office of the principal of Ngedukelu Catholic Kindergarten. These three incidents were later confirmed by the match between the victim's witness testimony and the medical findings in the VeR. (Nasarudin & Arafat, 2023)

One reason why the VeR has high evidentiary weight in this case is because it states that the injuries occurred within 5–7 days before the examination, which aligns with the time of the incident reported by the victim. This is clearly stated in the decision when the Panel of Judges stated that the hematoma was bluish and still visible on the victim's body during the examination on May 8, 2024, indicating that the injuries corresponded to the incident on May 1–2, 2024. VeR is scientific evidence that cannot be manipulated because it is based on an objective medical examination (Mamuaja et al., 2023). When the victim's testimony is consistent with the findings in the VeR, the evidentiary element becomes stronger and closes the gap for the defendant's defense to deny the element of coercion.

In addition to physical injuries, the Verification Report (VER) was considered alongside other evidence, such as a psychological report, which showed that the victim was under mental stress and under the defendant's control due to threats made via a fake WhatsApp account. The panel of judges stated that the defendant created a "no name" account to threaten the victim and convince her that her family would be killed if she did not comply with his demands for sexual intercourse. When these psychological threats

are combined with the physical injuries in the Verification Report, they form a complete evidentiary structure of coercion. The Verification Report must be read in the context of the victim's overall psychological burden to understand her position within the power and coercion relationship. (Astuti & Setiautami, 2025)

The defendant's statement, which attempted to establish that sexual intercourse was voluntary, the argument that consensual intercourse was refuted by the power of the Verification. VeR is a form of evidence with high probative weight because it is based on independent medical expertise. In this case, VeR provided a strong basis for the judge to conclude that the defendant committed rape by unlawfully placing the victim under his control. Therefore, VeR is not merely medical evidence, but rather a crucial element in connecting physical facts, psychological threats, and the elements of the crime under the TPKS Law.

### **3.2 Implementation of the visum et repertum in decision number 21/Pid.Sus/2025/PN Bju**

The implementation of the Visum et Repertum (VeR) in Decision Number 21/Pid.Sus/2025/PNBju appears to be the primary evidence confirming forced penetration and physical violence against the victim's reproductive organs. These medical findings directly refute the defendant's claim that the sexual intercourse was consensual. In the legal theory of evidence, medical evidence is scientific evidence that is difficult to refute because it relies on objective examination methods and the doctor's competence (Widagdo & Yusuf, 2024). Therefore, the Panel of Judges used the Verification Report (VER) as the primary foundation for determining whether there was a real incident of sexual violence with legal implications.

The Panel of Judges also integrated the VeR with other evidence, including statements from the victim, witnesses, and psychological reports. The verdict stated that the victim experienced severe pressure due to WhatsApp threats from an unknown number, which was later proven to be the defendant's own number. The verdict noted that the number belonged to the defendant and that the threatening messages stated that "the victim's family was in danger and would be killed if they did not comply with the agency's demands." The VeR then became physical evidence that the threat resulted in actual

coercion in the form of sexual penetration, which resulted in injury. The Panel of Judges considered that the combination of physical injuries and psychological pressure formed a chain of actions indicating sexual coercion. This aligns with the view that proving sexual violence must be viewed as a chain of physical injuries, psychological control, and power relations. (Astuti & Setiautami, 2025)

In the context of proving the element of "intent to place someone under his or her unlawful control," the Panel of Judges again referred to the Verification of the Criminal Procedure Code (VeR) as evidence that the defendant's actions had caused fear and helplessness in the victim. The judge wrote that the victim "had become a person who was not free and obeyed the defendant's wishes," as proven by the consistency between The VeR, victim statements, and psychological reports indicated severe trauma. This suggests that physical injuries were not only evidence of penetration. It is also part of the evidence that the victim was under the defendant's control. Nurmayanti & Yusuf (2025) emphasize that VeR has dual probative value: (1) evidence of physical violence, and (2) evidence that corroborates the allegation of domination or control over the victim's body (Ellison, 2002).

In jurisprudence, VeR is often used to assess whether penetration occurred naturally or unnaturally. VeR can identify the characteristic injuries of victims of sexual violence, as distinct from injuries resulting from consensual sexual activity (Lukow et al., 2021). The judge applied this principle in this case. After considering the entire body of evidence, the Panel of Judges declared that the elements of the second alternative charge under Article 6 letter b of the TPKS Law had been legally and convincingly proven, and the VeR was the most decisive evidence. The judge wrote that this medical evidence was "consistent with the testimony of the victim, witnesses, and psychological evidence," so there was no reason to doubt the veracity of the rape. The VeR was highly compelling because it was objective and not influenced by the subjectivity of the victim or perpetrator. (Simanjuntak et al., 2024)

In this decision, the VeR was not merely supplementary evidence, but rather core evidence that served as the foundation for constructing the evidence and the Panel's basis for issuing a verdict. Thus, the implementation of the VeR in this decision demonstrates that the court recognizes its role as crucial scientific evidence in proving sexual violence against women, especially married victims.

### **3.3 Juridical analysis of the relationship between the visum et repertum (visum et repertum), the victim's statement, and the judge's considerations**

The relationship between the Visum et Repertum (VeR), the victim's statement, and the judge's considerations in Decision Number 21/Pid.Sus/2025/PN Bju demonstrates how the construction of evidence for sexual violence is constructed holistically through a scientific evidence approach, the victim's narrative, and the judge's normative analysis. The Panel of Judges firmly stated that the victim's statement was central and consistent with the VeR. In modern evidentiary theory, particularly in sexual violence cases, integrating the victim's statement with scientific evidence is a mechanism to minimize the risk of re-victimization and provide maximum protection for the victim (Widagdo & Yusuf, 2024). Thus, the Panel of Judges positioned the VeR not merely as a supplement, but as a reinforcement of the objective validation of the victim's statement. The legal analysis of the relationship between the VeR and the victim's testimony becomes clearer when considering their consistency with the chronology of events (Nasarudin & Arafat, 2023).

This factual correspondence demonstrates that the VeR serves as a scientific verification instrument for the victim's narrative. The synchronous relationship between the temporal elements of the injuries and the victim's story strengthens the evidence and gives the judge confidence in the material truth. The victim's testimony regarding psychological pressure and digital terror threats from a fake WhatsApp account also strongly correlates with the VeR. The verdict stated that the defendant sent threatening messages such as "your family is in danger" through an anonymous account that turned out to be the defendant's own number, and that these threats were used as a means to coerce the victim into complying with the defendant's demands. The relationship between psychological threats and physical injuries proven in the VeR demonstrates that the element of coercion in rape is not solely determined by physical violence, but also by the victim's psychological condition, which prevents them from resisting (Astuti & Setiautami, 2025). In cases of sexual violence, power relations and psychological control are as important as physical evidence. The judge acknowledged this relationship when concluding that the victim was "unlawfully controlled" by the defendant.

The judge's considerations also indicate that the VeR was used to assess the victim's credibility and the consistency of her testimony. The verdict stated that the victim's statement was "consistent with the documentary evidence in the form of a *Visum et Repertum* and other evidence," which was later declared credible. The judge rejected the defense's claim that the relationship was consensual, as the injuries found on the victim were "inconsistent with consensual sexual intercourse" and rather reflected coercion. The Verification of the Victim's Verification (VER) plays a crucial role in testing the veracity and consistency of the victim's statement against the perpetrator's frequent denials. The judge's analysis of this case demonstrates the application of this principle. (Nuralinda & Arafat, 2022)

Furthermore, the judge used the integration of victim's verification and the victim's statement to uncover the defendant's manipulation scheme. The verdict stated that the defendant created a false persona called "agency" through WhatsApp messages and led the victim to believe that "the agency was a mafia group targeting the victim's family," thereby forcing the victim to comply with the defendant's orders. From a criminal law perspective, this constitutes a form of psychological power that places the victim in a helpless position. The Verification (VER) provides clear evidence that the threats resulted in forced penetration. VeR functions as evidence demonstrating that a sexual act resulted in physical consequences that could not have occurred without pressure or violence.

The judge's considerations also indicated that the VeR was used to strengthen the legal elements in Article 6 letter b of the TPKS Law. The judge emphasized that the defendant's actions met the element of "conducting physical sexual acts aimed at the victim's reproductive organs," as evidenced by the VeR (Mamuaja et al., 2023). Furthermore, the element of placing the victim "under his or her control unlawfully" was also deemed fulfilled through a combination of the VeR evidence, the victim's statement about the threat of murder, and the results of the psychological examination (Pardede et al., 2024).

Thus, the relationship between the VeR, the victim's testimony, and the judge's considerations in this decision demonstrates the application of modern evidentiary standards in sexual violence cases. The Panel of Judges did not place the VeR in isolation, but rather combined it with the victim's testimony and other evidence to build a strong

and convincing legal framework. This evidentiary model aligns with the evidentiary paradigm in the TPKS Law, which emphasizes a combination of scientific evidence, the victim's psychological condition, and the victim's narrative as the party with the most knowledge of the incident. This evidentiary structure is crucial to ensuring justice for the victim because it reduces bias and subjectivity in assessing the victim's testimony (Sari et al., 2024). With the support of the VeR, the Panel of Judges ultimately sentenced the defendant based on complete and comprehensive evidence, in line with the principles of victim protection in modern criminal law.

#### 4 CONCLUSION

This study demonstrates that *Visum et Repertum* (VeR) holds a strong evidentiary position in proving rape within the Indonesian criminal justice system, as supported by the Criminal Procedure Code, the Sexual Violence Crime Law (UU TPKS), and medico-legal forensic standards. Through the analysis of Decision Number 21/Pid.Sus/2025/PN Bju, the research shows that VeR can function as decisive scientific evidence in confirming forced penetration and strengthening the consistency between medical findings and the victim's testimony, even when coercion occurs through psychological threats rather than direct physical violence. However, the study also reveals that the interpretation and utilization of VeR in judicial practice remain inconsistent, particularly in cases involving psychological domination or minimal physical injuries. Such variations indicate the need for clearer interpretative standards and a more comprehensive understanding of medico-legal evidence among law enforcement officials. Therefore, this research emphasizes the importance of developing unified guidelines for interpreting VeR in sexual violence cases, as well as improving the capacity of investigators, prosecutors, and judges in understanding medico-legal findings. Strengthening the integration between legal reasoning and forensic medical expertise is essential to ensure more consistent evidentiary practices and better protection for victims within the criminal justice system.

## REFERENCES

- Astuti, L., & Setiautami, N. (2025). Penegakan hukum dalam kasus tindak pidana perkosaan terhadap penyandang disabilitas sensorik yang menjadi korban. *The Juris*, 9(1), 150–160.
- Bhaghamma, G. (2023). A comparative analysis of doctrinal and non-doctrinal legal research. *ILE Journal of Governance and Policy Review*, 1(1), 88–94.
- Ellison, L. (2002). Prosecuting domestic violence without victim participation. *The Modern Law Review*, 65(6), 834–858.
- Hairi, P. J., & Latifah, M. (2023). Implementasi undang-undang Nomor 12 Tahun 2022 tentang tindak pidana kekerasan seksual. *Jurnal Negara Hukum*, 14(2), 163–179.
- Lukow, M., Pangkorego, O. A., & Olii, A. (2021). Kajian Yuridis Visum Et Repertum Sebagai Alat Bukti Surat Dalam Pembuktian Perkara Pidana. *Lex Crimen*, 10(7).
- Mamuaja, K. M. O., Aling, D. F., & Worang, E. (2023). Peranan Visum Et Repertum Dalam Pembuktian Tindak Pidana. *Lex Privatum*, 12(2).
- Mnookin, J. L., & Ristovska, S. (2023). On the ontology and epistemology of visual legal evidence: Interview with Jennifer L. Mnookin. *First Monday*.
- Nasarudin, A. N., & Arafat, M. R. (2023). Peranan dan kedudukan visum et repertum sebagai alat bukti tindak pidana perkosaan. *Jurnal Ilmiah Wahana Pendidikan*, 9(14), 131–142.
- Natalie, V. P., & Darma, I. M. W. (2023). Visum et Repertum as Evidence in Sexual Violence Prosecutions: A Criminal Law Literature Review. *JUSTISI*, 9(3), 303–325.
- Nuralinda, Z., & Arafat, M. R. (2022). Pertanggungjawaban Hukum Pidana Terhadap Pelaku Pemalsuan Alat Bukti Visum Et Repertum. *Jatiswara*, 37(2), 205–211.
- Nurmayanti, D., & Yusuf, H. (2025). Kontribusi Visum et Repertum Dalam Sistem Pembuktian Hukum Pidana Di Indonesia. *Jurnal Intelek Insan Cendikia*, 2(8), 14349–14357.
- Pardede, B. A. M., Simamora, A. Y., & Yusuf, H. (2024). Kekuatan Visum Et Repertum Dalam Pembuktian Tindak Pidana. *Jurnal Intelek Dan Cendikiawan Nusantara*, 1(2), 2236–2245.
- Rifa'i, I. J. (2023). Ruang Lingkup Metode Penelitian Hukum. *Metodologi Penelitian Hukum*, 6.
- Sari, M. K., Renggong, R., & Oner, B. (2024). Alat Bukti Visum Et Repertum Sebagai Pembuktian Dalam Tindak Pidana Kekerasan Seksual Terhadap Anak. *Clavia*, 22(1), 134–141.

- Simanjuntak, T. G., Harahap, L. R., & Sembiring, A. M. (2024). The Role of Visum Et Repertum in Proving Criminal Matters in Indonesia. *International Journal of Law, Social Science, and Humanities*, 1(2), 83–90.
- Sukrisno, A., & Triadi, I. (2025). The Role Of Visum Et Repertum As Evidence In Rape Cases. *DiH: Jurnal Ilmu Hukum*, 209–222.
- Sumino, R., & Pramono, B. (2023). Medicolegal Aspects of Visum Et Repertum in Sexual Violence Criminal Cases. *JILPR Journal Indonesia Law and Policy Review*, 5(1), 88–98.
- Vallmuur, K., McCreanor, V., Cameron, C., Watson, A., Shibl, R., Banu, S., McPhail, S. M., & Warren, J. (2021). Three Es of linked injury data: Episodes, Encounters and Events. *Injury Prevention*, 27(5), 479–489.
- Widagdo, S., & Yusuf, H. (2024). Visum Et Repertum Sebagai Alat Bukti Dalam Pembuktian Kekerasan Seksual: Tinjauan Yuridis Normatif Terhadap Perlindungan Hukum Korban. *Jurnal Intelek Dan Cendekiawan Nusantara*, 1(2), 2885–2892.

#### **Authors' Contribution**

All authors contributed equally to the development of this article.

#### **Data availability**

All datasets relevant to this study's findings are fully available within the article.

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