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A Criminological Study and Criminal Responsibility Concerning the Murder of Biological Children

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Abstract

The phenomenon of domestic violence, motivated filicide in Depok, West Java, highlights the vulnerability of child protection within the domestic sphere. This research examines the criminal etiology behind filicide and the perpetrator's subsequent criminal responsibility. Strain Theory is utilized to analyzed the economic and social pressures driving the perpetrator to commit filicide, while Criminal Responsibility Theory evaluates the shift in sentencing between the court of first instance and the appellate court based on the element of guilt. This study employs a juridicial-empiricial method with a case study approach. Primary data was gathered through in-depth interviews with the perpetrator at the Gunung Sindur Class IIA Special Penitentiary of Gunung Sindur, complemented by secondary data from court decisions, statuary regulations, and legal literature. Data was collected via field and library studies, then qualitatively examined using descriptive-analytical methods. Criminological findings indicate that the filicide constituted criminal coping resulting from accumulated strains, specifically the failure to achieve economic goals, the loss of positive stimuli, and the dominance of negative stimuli. Conversely, from a criminal law perspective, the element of premeditation under Article 340 of the Criminal Code was fully met. However, a divergence in perspective arose when the Bandung High Court commuted the death penalty, citing sociological and psychological mitigating factors regarding the perpetrator's minor children. This consideration reflects an integrative sentencing policy, even though normatively it diminishes the core legal obligations inherent to parenthood.

INTRODUCTION

The background of the problem in this research begins with the enforcement of the right to life as an absolute human right (*non-derogable rights*), as guaranteed under Article 28A of the 1945 Constitution of the Republic of Indonesia. Every human being possesses inherent natural rights bestowed directly by God, as stated by John Locke (Haryono & Maryani, 2022). Therefore, the protection of the right to life must be supported by the government, state apparatus, state institutions, and society

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(Anggriani & Irawan, 2020). As the smallest unit of society, the family serves as the primary social environment for an individual to learn and adapt, ideally providing a safe space for positive socialization. However, human rights violations, specifically torture, which ranges from minor to severe violations, frequently occur within the domestic sphere in the form of Domestic Violence (Haryono & Maryani, 2022; Hakim & Syaefudin, 2023). Under Article 5 of Law Number 23 of 2004, Domestic Violence encompasses physical, psychological, sexual, and economic violence, with data from the Information System for the Protection of Women and Children showing a consistently high rate of domestic violence in Depok City (SIPPA UPTD PPA DP3AP2KB Kota Depok, 2025; Handayani et al., 2022; Nawangsari et al., 2024; Martitah et al., 2024).

Prolonged economic pressure serves as the most dominant factor behind domestic violence (Harefa, 2021). This economic strain triggers a threat to the established power structure, prompting the perpetrator to employ violence to reassert supremacy within the household (Margono, 2023; Scaptura et al., 2025). From the perspective of Roscoe Pound's sociological jurisprudence, law functions to balance social tensions, as a failure to do so creates accumulated suffering that breeds crime (Andreas, et al, 2025). In criminology, severe violence by a parent resulting in the death of a child is known as filicide, which is not merely an ordinary offense but the outcome of complex interactions among psychological, social, and economic factors (Mardlatillah & Koswara, 2026).

The phenomenon manifested in a real-world tragedy on November 1, 2022 in Jatijajar, Depok City, when a perpetrator (RN, 31 years old) launched a violent machete against his wife (NI, 31 years old) and his eldest child (KCP, 11 years old) (Yandwiputra, 2026; Hidayat, 2026). The incident was ignited after the wife questioned the perpetrator regarding overdue bank load payments, leading to a heated argument, verbal repudiation, and the wife's attempt to leave the house with their eldest child. The perpetrator moved his second child (MPA, 1 year old) to the garage before repeatedly attacking his wife, inflicting severe injuries as confirmed by expert testimony, and inflicting fatal injuries that led to death on his eldest child, as documented in *Visum et Repertum* No. R/006/Sk.B/XI/2022/IKF based on Decision of The Depok District Court No. 92/Pid.B/2023/PN Dpk.

A notable legal divergence emerged across judicial instances in handling this case. The Depok District Court, through Decision No. 92/Pid.B/2023/PN Dpk, sentenced the perpetrator to capital punishment under Article 340 of the Criminal Code and the Domestic Violence Law, finding that his acts were premeditated, exceptionally atrocious, and devoid of any mitigating factors. In contrast, the Bandung High Court in Decision No. 255/PID/2023/PT BDG commuted the sentence to life imprisonment, relying on sociological dan psychological grounds that the perpetrator could still serve as a father figure for his surviving second child.

The shift between the first-instance court and the appellate court highlights a dynamic tension between sociological justifications and legal grounds, raising critical questions about whether social status as a parent can legitimately override legal retribution or if it inflicts injustice upon the victims. This divergence mirrors the fundamental dilemma in Indonesian law enforcement, where prioritizing rigid legal certainty frequently creates a gap between formal law and substantive justice (Romdoni et al, 2023). Moreover, such sentencing disparities are instrinsically linked to judicial discretion and the independent power inherent in judges when evaluating criminal cases (Romdoni & Fitriasih, 2022). Consequently, this research focuses on criminal etiology to identify how economic factors and domestic conflicts induce psychosocial tension that triggers extreme violence, while comprehensively analyzing the internal and external factors of the perpetrator through criminological theory. Furthermore, this study examines the theory of criminal responsibility to evaluate

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whether the perpetrator's social status as a parent may serve as an excusing, justifying, or sentence-reducing condition in filicide offenses.

METHODS

Research Design

This study employed a qualitative juridical-empirical research design using a case study approach to examine the criminological etiology and criminal responsibility associated with the murder of a biological child in Depok City. The juridical-empirical approach was selected because the research examined the interaction between normative legal provisions and the empirical circumstances surrounding the criminal act. The case study design enabled an in-depth examination of a specific filicide case by integrating the perpetrator's account with relevant legal documents and judicial reasoning. Such an approach is appropriate for qualitative inquiry when a contemporary legal and social phenomenon requires contextual interpretation rather than statistical generalization (Creswell & Poth, 2018; Yin, 2018). The analysis was guided principally by Merton's Strain Theory, Agnew's General Strain Theory, and the doctrine of criminal responsibility to connect the empirical circumstances of the case with criminological and criminal-law interpretations.

Research Context and Data Sources

The research focused on a filicide case that occurred in Jatijajar, Depok City, West Java, involving the murder of the perpetrator's biological child and severe physical violence against his wife. The empirical component was conducted through an in-depth interview with the convicted perpetrator, identified as RN, at the Gunung Sindur Class IIA Special Penitentiary, Bogor, West Java. The legal component examined the relevant judicial and statutory framework governing the case. Primary legal materials consisted of the 1945 Constitution of the Republic of Indonesia, the Criminal Code (KUHP), Law No. 1 of 1974 as amended by Law No. 16 of 2019 on Marriage, Law No. 23 of 2004 on the Elimination of Domestic Violence, Law No. 35 of 2014 on Child Protection, and the relevant court decisions. Secondary materials included legal textbooks, scholarly journal articles, and expert opinions, while tertiary materials comprised legal dictionaries and the Great Dictionary of the Indonesian Language (KBBI). This combination of empirical and legal sources was consistent with the juridical-empirical orientation described in the original study.

Data Collection

Data were collected through field study and literature study. The field study involved an in-depth interview with RN to obtain first-hand information concerning the economic pressures, domestic conflicts, emotional experiences, coping responses, and circumstances preceding the offense. The interview data were used to contextualize the criminological interpretation of the case rather than to establish independent psychological or psychiatric diagnoses. The literature study involved systematic examination of legislation, judicial decisions, academic literature, and legal reference materials obtained from the Faculty of Law Library and Central Library of Sultan Ageng Tirtayasa University and the Jusuf Kalla Library. The original study explicitly identified these two collection strategies as its principal sources of empirical and documentary evidence.

Data Analysis and Trustworthiness

The collected qualitative materials were analyzed using a descriptive-analytical approach. The analysis proceeded through data reduction, organization of relevant information, interpretation, and synthesis of findings in relation to the research questions. Empirical information from the interview was examined through criminological categories, particularly economic strain, domestic disharmony,

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negative emotional responses, maladaptive coping, and displaced aggression. Legal materials were subsequently analyzed according to criminal responsibility, intent, premeditation, justification and excuse, and the differences in judicial sentencing. The analysis then integrated the empirical findings with the relevant criminological theories and legal doctrines to develop a contextual explanation of the case. As a qualitative case study, trustworthiness was supported through the use of multiple sources, including interview evidence, legislation, judicial decisions, and scholarly literature, allowing the interpretation of empirical claims to be examined against documentary and normative evidence (Creswell & Poth, 2018). The original study similarly specifies data reduction and descriptive-analytical interpretation as the principal analytical procedures.

RESULTS AND DISCUSSION

This section presents the findings generated from the qualitative juridical-empirical case study of the filicide case in Depok City. In accordance with the research design, the findings are organized into two principal areas. The first concerns the criminological etiology of the offense, particularly the economic, domestic, emotional, and behavioral factors identified through the interview with the perpetrator and examined through Merton's Strain Theory and Agnew's General Strain Theory. The second concerns criminal responsibility and the differences in judicial treatment between the Depok District Court and the Bandung High Court. The findings integrate the empirical account obtained from the perpetrator with relevant judicial decisions and legal materials. Accordingly, the results focus on identifying patterns and legally relevant facts rather than extending the analysis into broader theoretical or normative arguments.

Criminological Etiology of Father-Perpetrated Filicide in Depok City

Filicide represents a complex criminological phenomenon where the domestic sphere traditionally expected to serve as a primary protective sanctuary for a child and transform into a lethal execution site. In the case of perpetrator, the breakdown of his paternal role (good father) was not an isolated incident, but rather the culmination of accumulated criminogenic stressors, specifically chronic financial strain and domestic disharmony. To unravel this criminal etiology, Robert K. Merton's Strain Theory and Robert Agnew's General Strain Theory (GST) provide a unified framework showing that the offense stemmed from both structural-economic limitations and poorly regulated negative emotional states. Applying Merton's framework reveals a severe imbalance between societal goals (cultural element) and acceptable means (structural element). RN faced strong cultural expectations to act as a competent breadwinner and family protector, yet his structural means were severely constrained by his status as a temporary honorarium employee burdened with bank debt. This structural bottleneck induced profound status frustration, creating acute friction across substantive interests regarding financial obligations, procedural interests regarding marital communication, and psychological interest regarding his desire to be respected as a family head.

Within Merton's macro-sociological framework, this perpetrator's actions reflect a severe breakdown in the alignment between culturally prescribed aspirations and structurally available opportunities. Society imposes a dominant cultural mandate upon adult males to fulfill the role of the primary economic provider and authoritative household head. However, RN's socio-economic reality created an impassable structural bottleneck. As an honorarium employee, his limited earning capacity directly collided with escalating household expenditures and compounding financial obligations, notably his bank loans. This structural deficit generated acute frustration, a persistent psychological state occurring when an individual internalized cultural goal of success and stability but finds the institutionalized

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avenues toward achieving them structurally blocked. RN's inability to meet these economic expectations created an ongoing sense of institutional powerlessness and inadequacy within his own household, directly undermining his self-worth and undermining his perceived legitimacy as a family patriarch.

This unfulfilled structural expectation drove dynamic shifts in RN's behavioral adaptation over time, transitioning from passive retreatism to destructive rebellion. Initially, RN adopted Merton's retreatism through passive avoidance coping-suppressing overthinking, sleeping to evade marital conflicts, staying out until dawn, and historical substance use drugs. In-depth interviews with RN at the penitentiary, RN confirmed these maladaptive coping patterns, as he disclosed a long-standing habit of internalizing acute emotional distress rather than seeking external support, which gradually eroded his psychological resilience. When these maladaptive coping mechanisms failed to alleviate his underlying strain, his suppressed negative affect escalated into rebellion. On the day of the crime, following heated domestic disputes, verbal repudiation, and his wife's attempt to leave with their eldest child, RN abandoned legitimate dispute resolution. Instead, he created a destructive self-system aimed at reasserting his dominance and expelling emotional strain through extreme violence, abandoning societal standards of conflict resolution.

This transition from retreatism to rebellion highlights the volatile dynamic of unaddressed structural strain. Retreatism functioned as a temporary psychological buffer; by withdrawing from marital discussions, seeking refuge in sleep, and staying away from home, RN attempted to reject both the cultural demands he could not meet and the structural means he lacked. However, because passive avoidance does not resolve the structural source of strain, his underlying status frustration remained intact and continuously expanded. The sudden escalation into rebellion occurred when the structural strain intersected with an immediate crisis, his wife's active repudiation of his authority and her attempt to dismantle the household unit. At this critical juncture, RN's adaptation converted from passive detachment to active, violent rebellion. Rejection of institutionalized norms reached an absolute tipping point, he rejected the legal and moral norms governing familial guardianship and instituted a personal, destructive justice mechanism to forcefully reclaim control.

Expanding upon these adaptive shifts, Agnew's General Strain Theory (GST) explains why RN executed this violent act in full consciousness without presenting underlying psychopathology or substance intoxication at the same time of the offense. RN experienced a combination of objective strain, manifested in persistent marital disharmony and a history of domestic violence that violated societal norms and subjective strain, which included his acute sensitivity to financial arguments regarding his BTN bank loan, mutual allegations of infidelity, and the imminent threat of marital breakup. The prospect of his wife leaving and taking their child represented a total removal of positively valued stimuli (positively valued stimuli), severely threatening his ego and identity as a family patriarch.

Agnew's GST allows for a precise micro-level micro-analysis of how these accumulated strains directly generated the violent outcome. First, RN experienced the failure to achieve positively valued goals, as his aspirations for familial respect and financial stability were consistently thwarted. Second, he faced the actual and anticipated removal of positively valued stimuli, the impending departure of his wife and eldest child threatened to dissolve his core support system, social status, and paternal role in a single event. Third, he was continuously exposed to noxious and abusive stimuli in the form of chronic verbal arguments, humiliating accusations of financial incompetence, and mutual allegations of infidelity. Under GST, the convergence of all three strain categories without functional cognitive, behavioral, or emotional coping mechanism creates an overwhelmingly powerful negative affective

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state predominantly acute anger and humiliation. For RN, who lacked pro-social coping resources and external support systems, violence became the ultimate, albeit catastrophic, behavioral mechanism to alleviate this unbearable subjective strain.

The psychological mechanism behind the filicide act itself operated through triggered displaced aggression. When RN questioned his eldest child (KCP, 11 years old) regarding her choice to leave with her mother and received silence, his wounded ego diverted his primary anger toward his wife onto his daughter, who was perceived as taking her mother's side and disrespecting his authority. In criminological terms, this constitutes spousal revenge filicide, where the child is used as a secondary target or pawn to inflict maximum retaliation against the primary target, the spouse. RN's anger was thus displaced from the primary conflict with his wife onto the secondary victim who was more vulnerable and present in the immediate environment.

The cognitive processing of this displaced aggression was heavily modulated by RN's subjective appraisal of his daughter's silence. In his heightened emotional state, he interpreted her lack of response not as fear or hesitation, but as a conscious act of defiance and an explicit alliance with her mother against him. This subjective appraisal transformed the child into an active participant in his humiliation. Because direct aggression toward the primary source of strain (his wife) felt insufficient to fully avenge his shattered ego or immediately re-establish control, the aggression was toward the child. By harming the child, RN executed a devastating strike against the primary target, inflicting permanent psychological and emotional trauma on his wife, while simultaneously punishing the child for perceived disloyalty. This mechanism highlights how subjective cognitive distortions during peak strain states can turn a secondary, vulnerable family member into the primary recipient of lethal violence.

Ultimately, the time interlude between the initial argument at 02:00 WIB and the execution around 04:50 WIB did not serve as a cooling-off period, instead, it facilitated anger rumination. During his interview, RN admitted that he had harbored deep-seated resentment and hostility toward his wife over a prolonged period, which reached a breaking point during this critical timeframe. While wandering outside before returning home, his thoughts continuously dwelt on feeling deeply humiliated and cornered by her demands, reinforcing his long-standing grievances rather than allowing his temper to subside. Within this window, RN's chronic tendency to suppress and internalize his persistent anger transformed these impelling factors into a calculated, lethal assault instead of serving as a psychological inhibitor. This rumination period enabled him to deliberately execute the act, drawing directly upon his awareness of the pre-positioned weapon. Consequently, the criminogenic etiology of this filicide was therefore not a single isolated event, but a tragic accumulation of structural strain, failure of healthy coping mechanisms, and an emotional explosion. This case illustrates how unmanaged psychosocial strain within the domestic sphere can turn parental guardianship into violent lethality when an individual fails to navigate internal and external stressors.

From a GST perspective, this period of anger rumination served as the crucial cognitive bridge connecting accumulated strain to deliberate, lethal execution. Rather than dissipating emotional energy, rumination intensified RN's physiological arousal and cognitively entrenched his feelings of injustice. During these nearly three hours, his internal moral prohibitions against extreme violence. This cognitive processing converted raw, disorganized emotional distress into a focused, goal-directed intent. Consequently, when he re-entered the residence at 04:50 WIB, his cognitive state was fully primed for action, the pre-positioned weapon was not chosen in a state of unthinking panic, but was accessed as the instrument to execute a planned release of suppressed strain. The temporal gap, far from mitigating culpability, demonstrates the full transition of acute negative strain into a focused premeditated assault.

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Legal Accountability Analysis and Judicial Divergence Between Depok District Court and Bandung High Court

The legal accountability of perpetrator RN evaluates the alignment between intent (mens rea) and conduct (actus reus) under Indonesian positive criminal law, specifically drawing from facts established in Depok District Court Decision No. 92/Pid.B/2023/PN Dpk and Bandung High Court Decision No. 255/PID/2023/PT BDG. The prosecution charged RN with a combined alternative-cumulative indictment; primary charge under Article 340 of the Criminal Code (KUHP) for premeditated murder of his child (KCP), alongside Article 44 (2) Law No. 23 of 2004 on the Elimination of Domestic Violence for severe physical violence inflicted upon his wife (NI).

In Indonesian criminal law doctrine, establishing criminal responsibility strictly relies on the fundamental principle "geen straf zonder schuld" (no punishment without fault). To establish full criminal fault, three cumulative elements can be breakdown; first, the perpetrator's legal capacity to be hold responsible; second, the psychological relationship between the perpetrator and the act, manifested in the form of intent (opzet or dolus); and third, the absence of any statutory ground of justification or excuse. RN's actions unequivocally fulfilled these legal components, except culpa (negligence).

Regarding the first element, RN demonstrated full legal capacity at the time of execution. Under criminal law doctrine, a perpetrator possesses legal capacity if they can comprehend the normative value and social consequences of their actions and are capable of directing their will-power according to that understanding. The forensic facts established that RN suffered from no underlying mental deficiency, permanent cognitive disorder, or involuntary intoxication during the offense. His deliberate actions prior to the assault, specifically relocating his second child to the garage, demonstrate intact rational control, a conscious awareness of the violent act he was about to commit, and an intentional staging of the crime scene to isolate the victims.

Under wills-theory (wills-theorie) and imagination theory (voorstellings-theorie), RN's mental state satisfied the standard of direct intent (dolus directus or opzet als oogmerk). This satisfies the second element of fault, intent (opzet). RN not only willed the act (willen) but also possessed a clear cognitive representation (voorstelling) of its lethal consequence. The time interlude from the initial domestic argument at 02:00 WIB to the execution around 05:10 WIB offered sufficient opportunity for calm deliberation, yet RN utilized this window to reinforce his anger rumination rather than abandon his plan, fulfilling the element of premeditation (dolus premeditatus). His repetitively targeted machete strikes to vulnerable vital areas (head and neck) of both victims, coupled with his strategic positioning and prior concealment of the weapon, establish both of the objective element of an unlawful act and the subjective element of direct lethal intent.

Finally, regarding the third element, there were no statutory grounds of justification or excuse that could eliminate the unlawful nature of his conduct or exempt him from legal culpability. RN's actions were not executed under necessary defense (noodweer), overbearing force (overmacht), or statutory duty. The domestic arguments, verbal provocations, and financial strain he experienced do not constitute an imminent unlawful attack required to invoke legal justification, nor do they meet the threshold of an irresistible psychological impulse that would excuse his deliberate resort to lethal violence. With all three elements established without exception, RN's legal liability was complete and legally unassailable.

Regarding the cumulative charge under Article 44 (2) Law No. 23 of 2004 on the Elimination of Domestic Violence, the physical injuries sustained by victim NI

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documented in *Visum et Repertum* No. 01/RSSM-CSK/VER/XI/2022 as multiple deep lacerations to the face, neck, back, and defensive wounds on her hands, substantiate a severe physical actus reus causing permanent disability. Although victim NI survived the attack, RN's repeated hacking motions while the victim was incapacitated demonstrate that his mens rea encompassed a direct desire (dolus directus) to cause fatal harm. RN's criminal responsibility is thus fully established under both objective mirrors (the criminal illegality of the acts) and subjective mirrors (his full conscious capacity and absence of psychological defects or involuntary intoxication at the time of execution). Because no mitigating factors were recognized at first instance, the Depok District Court sentenced TN to capital punishment under a purely retributive theory of punishment aimed a proportional retribution for an atrocious act against his own family.

A critical judicial shift occurred at the appellate stage, where the Bandung High Court modified RN's sentence from the death penalty to life imprisonment. The key divergences between the two judicial decisions are summarized in the table below:

Table 1. Comparsion of Judicial Rulings

Qualification	**Depok District Court Decision** (No. 92/Pid.B/2023/PN Dpk)	**Bandung High Court Decision** (No. 255/PID/2023/PT BDG)
Verdict	Sentenced to Death Penalty	Sentenced to Life Imprisonment
Evaluation of Consequences	The Panel of Judges declared the perpetrator's an atrocious act, especially committed by a father, resulting in the death of his biological child.	The Panel of Judges evaluated that the wife didn't pass away.
Mitigating Considerations	Found no mitigating circumstances within the perpetrator.	Considered the existence of the perpetrator's second child, who is still a minor and requires a paternal figure in their development.

Source: Authors' analysis of Depok District Court Decision No. 92/Pid.B/2023/PN Dpk and Bandung High Court Decision No. 255/PID/2023/PT BDG.

While both judicial tiers agreed on the objective assessment of guilt under Article 340 Criminal Act and Article 44 (2) Law No. 23 of 2004 on the Elimination of Domestic Violence, they diverged significantly in their subjective evaluation of sentencing proportionality and purpose. The High Court observed that despite RN's lethal intent, victim NI ultimately survived. Grounded in the principle of legal balance, which dictates that infringing one's legal rights to protect another must remain proportional, the appellate judges recognized that executing RN would indirectly inflict severe harm on his surviving second child, who would be doubly deprived of a father after already losing a sibling. Consequently, the High Court adopted a combined theory of punishment, maintaining a severe retributive sanction through life imprisonment while incorporating relative (utilitarian) sentencing goals to prevent new psychosocial suffering for the surviving minor.

This sentence modification aligns with contemporary shifts in Indonesian penal philosophy, as articulated by legal scholars like Harkristuti Harkrisnowo, moving away from strict retributivism toward restorative and rehabilitative of the New Criminal Code, the High Court's ruling embodies this progressive approach by balancing past retribution with future social utility. From a child protection standpoint, this decision upholds the principle of the best interest of the child, preserving the minor's minimal psychological right to a paternal figure without

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subjecting the child to the secondary trauma and stigma associated with state execution. However, from criminological and psychological perspective, this rationale introduces an inherent dilemma; given RN's history of domestic abuse and extreme violence, his paternal role remains non-functional, serving purely as a symbolic presence requiring long-term psychological guidance rather than active caregiving.

Ultimately, the divergent rulings between the Depok District Court and the Bandung High Court demonstrate that criminal adjudication requires more than establishing guilt and legal culpability. Although both judicial tiers confirmed the perpetrator's full criminal responsibility for filicide committed with direct premeditated intent, the appellate court's sentence reduction reflects a more nuanced application of criminal proportionality. By shifting from absolute retributivism toward a integrated sentencing framework, the judiciary effectively balanced state punitive power with the preservation of an innocent minor's long term legal and psychological well-being, illustrating the potential for positive criminal law to evolve in harmony with broader systemic utility and fundamental human rights.

Criminological Mechanisms, Criminal Responsibility, and Implications for Filicide Prevention

The findings extend contemporary filicide research by showing that paternal filicide may emerge from the interaction of economic strain, domestic conflict, perceived loss of family authority, maladaptive coping, and displaced aggression rather than from a single precipitating factor. This interpretation is consistent with recent systematic evidence identifying marital conflict, family violence, socioeconomic disadvantage, and perpetrator-related vulnerabilities as interconnected factors in filicide. A recent Turkish study similarly found that paternal filicide presented a distinct sociodemographic and situational pattern compared with maternal filicide, supporting the importance of examining paternal cases separately rather than treating filicide as a homogeneous phenomenon.

The role of economic pressure identified in this case is also consistent with evidence linking socioeconomic disadvantage and parental stress to child maltreatment. Martins et al. (2023) found that socioeconomic disadvantage was associated with higher parental stress and greater risk of child abuse, while longitudinal evidence indicates that parenting stress can precede subsequent maltreatment. Research on Asian American and Pacific Islander families likewise demonstrates associations between economic hardship and physical or psychological aggression toward children. These findings strengthen the present study's interpretation that financial difficulties should be understood as a contextual strain that can intensify family conflict rather than as a direct or deterministic cause of homicide. A systematic review further indicates that parental employment and financial problems can spill over into family relationships and child maltreatment through parental stress and deteriorating family functioning.

The findings also contribute theoretically by connecting Merton's structural strain perspective with Agnew's General Strain Theory (GST) at the level of a single paternal filicide case. Recent GST research confirms that strain can generate negative emotions that subsequently increase the likelihood of criminal coping. Other studies demonstrate that anger can mediate the relationship between adverse experiences and offending, although the strength of this mechanism varies across populations and forms of strain. Research on cumulative victimization further suggests that multiple concurrent strains can increase exposure to criminal coping processes. The present study's novelty therefore lies in demonstrating how these theoretical mechanisms can be integrated to explain the transition from accumulated household strain to anger, rumination, and aggression directed toward a secondary target within the family.

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The finding of aggression spilling from marital conflict toward the child is consistent with family-system research showing spillover and crossover between intimate-partner violence and parent-child aggression. Recent research also emphasizes the importance of fathers' hostility, emotional functioning, and coparenting difficulties in understanding violence within families. Consequently, prevention should not focus exclusively on the child as the potential victim but should incorporate economic assistance, family-conflict intervention, anger regulation, and accessible social support. Evidence that social support and protective factors can modify pathways between strain and offending further supports this multi-level approach.

The legal findings additionally demonstrate that establishing criminal responsibility and determining the appropriate sentence are analytically distinct processes. Recent research on filicide and criminal justice outcomes confirms that maternal and paternal perpetrators may experience different justice outcomes, while recent forensic research emphasizes differences in criminal responsibility across filicide cases. The divergence between the Depok District Court and Bandung High Court therefore illustrates how sentencing may incorporate different legally relevant considerations even when the underlying criminal responsibility is maintained.

The practical implication is that early intervention should identify combinations of financial stress, escalating marital conflict, ineffective coping, and prior violence before they progress toward lethal behavior. Recent research specifically recommends interventions addressing economic stress and parental resources as part of filicide prevention. Limitations include the single-case qualitative design and reliance on available interview and legal-documentary evidence, which restrict generalization and prevent causal inference. Future research should therefore compare multiple paternal filicide cases across Indonesian jurisdictions, integrate judicial and psychosocial records where ethically and legally accessible, and examine how social support, economic conditions, gendered family expectations, and criminal-coping processes interact over time.

CONCLUSION

This study concludes that the Depok filicide case was shaped by an accumulation of socio-economic and domestic strains rather than a single precipitating event. Economic insecurity, pressure associated with the provider role, prolonged marital conflict, ineffective coping, and anger rumination interacted to facilitate displaced aggression, in which the child became a secondary target of violence directed primarily toward the spouse. From the perspective of criminal law, the findings indicate that RN possessed legal capacity, acted with direct intent and premeditation, and was not protected by a recognized justification or excuse.

The contrasting judicial outcomes death imprisonment at the district court level and life imprisonment on appeal demonstrate that criminal responsibility and sentencing considerations may involve distinct assessments of culpability, proportionality, and the interests of surviving children. Theoretically, the study contributes an integrated application of strain and displaced-aggression perspectives to paternal filicide. Practically, it highlights the need for early family-conflict intervention, economic support, and accessible coping resources. The single-case design limits generalization. Future research should compare multiple cases and integrate legal, social, and psychosocial evidence across different regions and judicial contexts in Indonesia.

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