

TRIAL BY THE PRESS BY MASS MEDIA IN THE NEWS COVERAGE OF THE YANA MULYANA CASE

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Abstract

In reporting the case of Yana Mulyana, the mass media often engages in the practice of trial by the press. This article discusses news coverage that blends facts with opinions, thereby violating Law No. 40 of 1999 on the Press and the Indonesian Journalistic Code of Ethics. The research is conducted using a framing analysis approach by Zhongdang Pan and Gerald Kosicki to understand the media articles, as well as a doctrinal legal research approach to analyze the practice of trial by the press. In the three news articles reviewed, it is evident that the media framing used in the articles mixes facts with opinions, which consequently violates the principle of presumption of innocence as stipulated in the Press Law and the Journalistic Code of Ethics. This article concludes that the framing applied by several media outlets in reporting the corruption case involving Yana Mulyana, by blending facts with opinions, constitutes a practice of *trial by the press* and reflects a systemic failure in the Indonesian justice system.

Keywords: Trial by the Press, Framing Analysis, Journalistic Ethics

1. INTRODUCTION

The slogan “*Bad news is good news.*” has become a principle held by various mass media actors in delivering news to the public. This is evident in various media reports concerning sensational cases within society. Mass media often intentionally constructs specific frames in their reporting to influence the formation of public perception. Robert MacNeil, a former anchor for the MacNeil-Lehrer News Hour, commented on the current state of journalism by describing it as “the end of news as we know it.” MacNeil continued:

“Journalism was treated, if not as a learned profession, at least as an honorable and respected craft that had a vital role in democracy. I am pessimistic... because all the trends in journalism are toward sensational, hype, hyperactive, and tabloid values to drive out the serious. In this trend, I see the end of news as a commodity that provides a service to the community and turning it into entertainment, and I fear that the values that drive news in that direction will only increase with competition.”

Barry Mitchell further reinforces this opinion by stating that, through no fault of their own, most of the public holds an inaccurate view of sentencing arrangements. He explains that distorted public perception occurs because the mass media does not provide sufficient, or sometimes provides inaccurate or intentionally fragmented information to the public to form a specific frame.

Mass media possesses the ability to construct social reality through reporting shaped by specific techniques, one of which is news framing. According to Eriyanto, framing analysis is a concept used to observe the structure and construction of a reality framed by the media. Thus, framing analysis is a process aimed at presenting a message and emphasizing certain information to make it more prominent than others. This causes readers to focus more on specific aspects of the message the reporter intends to convey. Framing itself can be understood as a technique to showcase a particular viewpoint or perspective used by journalists in presenting news to shape public perception. This construction of public perception is formed through framing, which is a media strategy in processing an event into a news article. In this regard, mass media and reporters function not only as conveyors of information but also as instruments capable of steering public perception toward a specific conclusion.

Mitchell V. Charnley argues that the foundation of journalistic reporting must carry a service element, which he refers to as “Enlightened” service to the public. Reporting should not consist merely of denials and conjectures because news inevitably issues a judgment based on facts. The proof must be fair, must not disadvantage certain parties, and the reporter must prepare a strong framework of factual clarity.

The power of mass media in shaping perception was evident in the case of Yana Mulyana, the former Mayor of Bandung (Case No. 88/Pid.Sus-TPK/2023/PN Bdg). The publication of this case from the stages of inquiry, investigation, and prosecution to the trial was carried out continuously by the mass media, creating a public perception of guilt. The former Mayor became a target of relentless media coverage across television, print, and online platforms, significantly capturing public attention. Within a span of a few days, dozens of online media outlets reported on Yana Mulyana from various angles. Among these, online mass media was the most aggressive. This continuous publication before a court verdict was reached formed a public perception of Yana Mulyana’s guilt. Cases like Yana Mulyana’s should not occur as they violate the restrictions set forth in Press Law Number 40 of 1999, the Press Council Regulation Number 6/Peraturan-DP/V/2008 Article 3, and the Indonesian Journalistic Code of Ethics (PWI) Article 7.

These practices pose a threat as they turn mass media into a sort of “Judicial Institution” for a suspect when a journalist declares them guilty despite the absence of a court ruling. Regardless of the eventual court verdict, the actions taken by online media against the suspect constitute a form of judgment by the media without a trial. In the Indonesian context, trial by the press is prohibited through the presumption of innocence as a primary principle, supplemented by other principles such as objectivity, verification, cover-both-sides, and the protection of identity. These journalistic principles are complementary and form a unified framework that defines trial by the press, allowing journalists to avoid such practices.

The ethics and credibility of the press are not self-evident. The press is not exempt from weaknesses and flaws; they frequently act as judges passing sentences

through tendentious reporting or comments aimed at forming a specific perception. Court verdicts are often preceded by press coverage and questioning that can constitute a trial by the press, meaning the press effectively acts as a substitute for the court in determining whether an individual is guilty or innocent.

2. METHODOLOGY

This research employs a normative legal research method to examine the legal basis of the presumption of innocence in mass media reporting. In this regard, the researcher will conduct a review of relevant laws and regulations, specifically Law Number 40 of 1999 concerning the Press. The study will also analyze the legal aspects of 'trial by the press' in Indonesia to understand how statutory formulations and the Journalistic Code of Ethics prohibit such conduct in the coverage of corruption cases.

Furthermore, within the framework of interdisciplinary legal research, the researcher will collect and analyze data from non-legal disciplines, such as communication science, to gain a more comprehensive understanding of the 'trial by the press' phenomenon and media framing practices in corruption cases. This interdisciplinary approach is intended to sharpen the doctrinal analysis, enabling it to deconstruct and resolve legal issues encountered in practice. Nevertheless, this approach must maintain coherence between the various methods and theories utilized. Consequently, such an approach requires the researcher to possess the capacity to master two or more disciplines in an integrative manner.

3. FINDINGS AND DISCUSSION

3.1 Analisis Framing Model Zhongdan Pan dan Kosicki

There are various approaches to analyzing the meaning of framing. Goffman is one of the key figures in the development of framing theory, presenting his ideas on the concept of frames in his book *Frame Analysis* published in 1974. Goffman explains that frames are not limited to news reporting; rather, they are learned and applied in everyday human life. Framing itself even becomes a fundamental basis for human behavior. Understanding the frames that exist within a society can help individuals adapt, socialize, and become part of that society. According to Goffman, events that have occurred and are currently occurring are part of an individual's personal world. This process is commonly carried out through the use of a "frame," which Goffman defines as a situation determined by principles of organization that govern events and our subjective involvement in them. This is accomplished through the use of frames. Frame analysis is therefore used to analyze the organizational dimensions of such experiences.

Goffman distinguishes several types of frames, one of which is the primary frame, which he categorizes into natural and social frames. Natural frameworks identify events as physical occurrences; when interpreted literally, these events are

understood as natural phenomena, without being linked to social influences as the causes of their occurrence. In contrast, social frameworks view events as occurrences driven by social factors, as they are influenced by intentions, goals, and manipulation by various social actors. These social frameworks are constructed upon natural frameworks. Such frames, and the frames produced through communication, have a significant influence on how data are interpreted, processed, and ultimately conveyed. Goffman assumes that individuals can use these frames in everyday life, either consciously or unconsciously. The theoretical approach underlying Goffman's perspective represents a social psychological approach to analyzing forms of human behavior.

In contrast to Goffman, Minsky in his work employs the concept of frames in the context of computerized knowledge representation. The concept of frames proposed by Minsky is broader than earlier definitions of frames, as his framing explains how knowledge can be organized. He describes a frame as a data structure consisting of a network of nodes and relationships, which is used to explain and represent stereotypical situations. Within a frame, there is information about how it is to be used, what can be expected to occur, and which other frames are relevant for use under certain conditions. This frame contains a large amount of information that is complexly interconnected around a single topic, organized based on commonly observed patterns and procedures.

Framing theories proposed by figures such as Goffman, Gitlin, and Gamson are categorized as sociological concepts, while figures such as Minsky, Kahneman, and Tversky are placed within the category of psychological concepts. In contrast to these perspectives, the framing concept developed by Zhongdang Pan and Kosicki positions framing as the central focus, namely as a process of meaning construction derived from a text or written content. In this view, framing analysis becomes a method for examining meaning within specific aspects of a text and for understanding how the media engages in storytelling when presenting the events discussed in an article.

According to the model of Zhongdang Pan and Kosicki, framing can be examined through four structural dimensions of news texts that function as framing devices: syntactic, script, thematic, and rhetorical. The syntactic dimension of a news article can be observed in the body of the text, including the use of headlines, word choice in the lead, the background information employed, as well as sources and quotations. The script dimension concerns how the narrative of a news article is structured. This analytical device focuses on how journalists construct the storyline of a news article and how they package an event. This can be identified through the application of the 5W and 1H—who, what, when, where, why, and how—within the article written by the journalist. The thematic dimension is reflected in the propositions or sentences expressed by the journalist in shaping an event within the presented news. Lastly, the rhetorical dimension examines how emphasis is placed on certain intentions within a news article. Rhetorical analysis focuses on how journalists

highlight specific aspects of an article through the use of idioms, graphics, and images in order to stress particular meanings in the news content.

These four analytical devices constitute an integrated framework used to identify the framing of a news article. Through the application of these four dimensions, one can observe a journalist's tendencies in interpreting an event. When writing news and emphasizing meaning in relation to an event, journalists employ all of these discursive strategies to persuade the audience that the news they present is valid and credible.

Please do not number sections or subsections manually; numbering is automated by the template. In this study, the framing devices employed are based on the four analytical devices proposed by Zhongdang Pan and Kosicki. Within the syntactic structure, the units of analysis consist of the headline, lead, source quotations, and the closing section of each news article. Within the script structure, the units of analysis are the elements of 5W and 1H in each news item. Within the thematic structure, the units of analysis include paragraph propositions, sentences, and the relationships between sentences in each article. Within the rhetorical structure, the units of analysis consist of idioms and photographs/images used in the news articles.

Based on the explanation above, the framing analysis of Zhongdang Pan and Kosicki adopts an approach that differs from other traditional approaches in news analysis. Nevertheless, elements from earlier approaches are still utilized, albeit within certain limitations. The researcher chose this analytical method for two main reasons. First, framing in Pan and Kosicki's analysis does not view news texts merely as psychological stimuli with inherent meaning; rather, news texts are seen as organized symbolic devices that interact with individual memory to construct meaning. Pan and Kosicki formulate their framing model objectively, making it identifiable and assessable. Second, the validity of framing analysis does not depend on the researcher's ability to interpret news texts subjectively or in great depth, but instead relies on systematic procedures for collecting textual data to identify relevant patterns, distinguishing it from other theories.

The researcher limits the study by selecting a single article sample based on the principle of purposive sampling, so that the research focuses on the most relevant data. This approach is consistent with framing analysis methodology, which emphasizes depth of textual analysis rather than a large number of samples. As explained by Krippendorff, text analysis does not require a large sample size, but prioritizes the meaningfulness of data to comprehensively answer the research questions.

By utilizing specific news article samples, this research provides an in-depth examination of framing patterns, narrative structures, and the context of reporting, ensuring the discussion remains both relevant and focused. This approach allows the researcher to avoid over-generalization that may arise from a larger sample size with

less detailed analysis. Specifically, the researcher analyzes the news article titled 'Dalam 1 Tahun, Harta Kekayaan Wali Kota Bandung Yana Mulyana Naik Rp 1,4 Miliar' (In One Year, the Wealth of Bandung Mayor Yana Mulyana Increases by Rp 1.4 Billion), written by Bintang Pradewo and published on April 15, 2023, by JawaPos.com.

Table 1. News Article Sample: "In 1 Year, Bandung Mayor Yana Mulyana's Wealth Increased by IDR 1.4 Billion"

Paragraph/Title	Proposition	Syntax/Analysis	Rhetorical Thematic Script
Title <i>"In 1 Year, Bandung Mayor Yana Mulyana's Wealth Increased by IDR 1.4 Billion"</i>	Title	Explains "What" and "Who": however, it is not yet detailed.	Increase in Yana Mulyana's Wealth
P1 <i>"The Mayor of Bandung, Yana Mulyana, along with several officials from the Transportation Agency and private sector, was caught in a Red-Handed Operation (OTT) by the Corruption Eradication Commission (KPK) on Friday night (14/4). The KPK OTT that implicated Yana Mulyana and several others is related to the alleged bribery case in the procurement of CCTV and internet network for Bandung Smart City."</i>	Main Paragraph	Re-explains "What" and "Who": KPK arrested Yana Mulyana and Bandung Transportation Agency officials in the OTT.	Yana Mulyana caught in KPK's OTT.
P2 <i>"According to the State Officials' Wealth Report (LHKPN) data for the period of December 31, 2021, Bandung Mayor Yana Mulyana reported assets worth IDR 7,154,560,921 billion."</i>	Attribution	Explains "When": Yana's wealth LHKPN report on December 31, 2021.	Yana Mulyana's wealth report.
P3 <i>"After a year of replacing the late Oded M Danial, who passed away on December 10, 2021, the wealth of the number one person in Bandung City is said to have increased significantly. As of December 31, 2022, Bandung Mayor Yana Mulyana's assets reached IDR 8,551,790,145 billion."</i>	Supporting Paragraph	Explains "How": Yana's wealth increased by IDR 1.4 billion in one year.	Significant increase in Yana's wealth.

<p>P4 <i>"The types of Yana's assets include land and buildings valued at IDR 5 billion, with 396 square meters of land. It is also recorded that there is a Harley Davidson Fatboy vehicle valued at IDR 350 million, along with a Pajero Sport car valued at IDR 490 million."</i></p>	<p>Attribution</p>	<p>Explains "What": Details of Yana's assets in the form of land, vehicles, and cash.</p>	<p>Details of Yana's asset types.</p>
<p>P5 <i>"Ali Fikri mentioned that the corruption OTT involving the Mayor of Bandung and several transportation agency officials up to the private sector, was carried out on Friday night."</i></p>	<p>Attribution</p>	<p>Explains "Who" and "When": The OTT was carried out on Friday night by KPK.</p>	<p>Information related to the bribery case with an official statement from the authorities.</p>
<p>P6 <i>"The number of people arrested so far is 9 people including the mayor and several other officials in the Bandung City Transportation Agency," he added."</i></p>	<p>Reference</p>	<p>Explains "Who": describes the nine people arrested, including the Mayor of Bandung.</p>	<p>Number of parties arrested in the OTT.</p>
<p>P7 <i>"The nine people are currently being brought to the Merah Putih Building, South Jakarta, for examination."</i></p>	<p>Supporting Paragraph</p>	<p>Explains "Where": Suspects are taken to the Merah Putih Building for examination.</p>	<p>Describes the concrete steps taken by the KPK after setting the OTT.</p>

In the syntactic analysis of the article, the flow of bribes received by the Mayor of Bandung, Yana Mulyana, the Head of the Transportation Agency, Dadang Darmawan, and the Secretary of the Transportation Agency, Khairul Rijal, from three separate parties is clearly outlined. The detailed description of the figures involved and the specific financial data (Rp 1.4 billion) lends an air of validity and credibility to the reporting. However, the chosen headline steers the readers toward a negative bias by presenting fragmented facts rather than a holistic view. The headline emphasizes the receipt of bribes as a proven fact, despite the reality that these allegations had not yet been adjudicated in a court of law.

Regarding the script analysis, the information within the article is quite explicit. The report effectively addresses the 'Who' (the recipients and givers: Yana, Dadang, Khairul, Benny, Andreas, Sony), the 'What' (bribery amounting to Rp 924.6 million), and the 'Why' (to secure a specific project). This detailed breakdown provides a comprehensive overview of each party's alleged role in the criminal act of corruption. In the thematic analysis, the author highlights a central theme: the existence of suspected widespread corruption involving multiple actors from both the public and

private sectors. The narrative steers public opinion by focusing on the large monetary value and the involvement of numerous parties as 'evidence' of the crime.

Finally, in the rhetorical analysis, the emphasis on specific figures such as 'Rp 924.6 million' creates a concrete impression of the scale and impact of Yana Mulyana's alleged corruption. The lack of discussion regarding the ongoing judicial process reinforces an assumption of guilt, suggesting that the corruption is an absolute certainty that has inherently harmed the public.

3.2 "Trial by the Press Practices in Online Media Coverage of the Yana Mulyana Case

Generally, trial by the press refers to mass media actions that cast judgment on an individual as if they were already declared guilty, despite the absence of a final and binding court decision (*inkracht*). Two primary perspectives elucidate the underlying rationale for this concept. According to Nazaruddin, trial by the press is grounded in the principle that within a state based on the rule of law (*rechtsstaat*), no individual or entity is permitted to take the law into their own hands, a practice known as 'vigilantism' or *eigenrichting*. This principle dictates that only a court of law holds the legitimate authority to determine an individual's guilt through formal legal proceedings. In contrast to Nazaruddin's view, Siregar asserts that the right to be presumed innocent until a final and binding court verdict is rendered is a fundamental human right. He further contends that news disseminated to the public must strictly reflect actual events or established facts and must not be tainted by the personal opinions of the reporting journalist. Such published reports possess the significant power to shape public perception, resulting in either positive or negative societal consequences.

In practice, both during and after a trial, the media often assumes the role of a judge by delivering news or commentary that tends to steer public opinion toward a specific conclusion regarding a suspect or defendant. According to Nasution, the information disseminated by the media before a trial is often so comprehensive that the perpetrator appears as if they have already been 'judged.' This aligns with Yulianingrum (2004, p. 91), who explains that when an individual's misconduct is proclaimed through media writing, it is considered a form of 'trial by the press' that violates the presumption of innocence.

Considering the expert opinions above, there is clearly a close correlation between 'trial by the press' and other legal principles. It must be understood that protection against trial by the press is manifested through the presumption of innocence as the primary principle, which is further supplemented by other principles discussed by the author: the presumption of innocence as a fundamental tenet, the principle of Testing Information, the principle of Balance, and the principle of Judging Opinion (Mustawa, 2019, p. 37). Consequently, the avoidance of trial by the press can only be achieved by fulfilling these aforementioned principles and tenets.

The presumption of innocence, as the most pivotal principle in avoiding trial by the press, is adopted in Indonesia through various laws and regulations, such as

Article 8 of Law No. 14 of 1970 concerning the Basic Provisions of Judicial Power. Similarly, in the General Explanation of point 3C of the Criminal Procedure Code (KUHP) Number 8 of 1981, the presumption of innocence implies that during the implementation of criminal procedural law, a defendant or suspect must be deemed innocent. Consequently, judges, public prosecutors, and investigators are obligated to respect the inherent rights of the suspect or defendant, as these are protected by law. Furthermore, Article 5, Paragraph (1) of Press Law Number 40 of 1999 also provides protection to suspects by explicitly mandating the application of the presumption of innocence. Wina Armada argues that the presumption of innocence is the principle stating that a suspect remains innocent until a final and binding judicial verdict is reached.

The regulation of this principle extends beyond statutory legislation to include various journalistic institutions, such as the Press Council (Dewan Pers), the Alliance of Independent Journalists (AJI), and the Indonesian Journalists Association (PWI), each of which incorporates the presumption of innocence into their respective codes of ethics. These regulations are designed to prevent journalists from judging suspects or individuals in their reporting, thereby upholding the integrity of the profession and protecting the public from unprofessional journalistic practices. This commitment is reflected in the following codes of ethics: First, Article 3 of the Journalist Code of Ethics (Press Council Regulation No. 6/Peraturan-DP/V/2008) explicitly mandates that journalists apply the presumption of innocence in their reporting. This is accompanied by obligations to verify information, provide balanced coverage (the 'cover both sides' principle), and separate facts from judgmental opinions. Consequently, according to the Press Council, the presumption of innocence does not stand alone but must be implemented alongside verification, balanced reporting, and the clear distinction between facts and opinions. Second, Article 7 of the PWI Journalist Code of Ethics stipulates that Indonesian journalists must respect the presumption of innocence in reporting related to legal violations and judicial processes. This obligation is inherently tied to the principles of justice, honesty, and balanced reporting. Therefore, the PWI also maintains that the presumption of innocence cannot be applied in isolation; it must be exercised in conjunction with the principles of fairness, honesty, and balance in the delivery of news.

Within the various Codes of Ethics mentioned above, a frequently recurring principle is that journalists must not conflate facts with judgmental opinions. Judgmental opinion refers to the journalist's personal viewpoint, which is distinct from interpretive opinion—a perspective representing the journalist's interpretation of facts. Therefore, in news reporting, journalists must present only the facts of an event without adding personal bias. If an article contains an opinion, it must not be subjective or judgmental; rather, it should be an opinion grounded in the interpretation of established facts. This principle is further detailed in the 'Ten Guidelines for Legal Writing' published by the Indonesian Journalists Association (PWI). Point No. 7 states that to

avoid trial by the press, the tone and style of reporting must remain neutral and should not reflect accusations or the assumption that a suspect is guilty. Journalists are advised to avoid using adjectives that convey opinion, such as claiming that a witness's testimony incriminates the defendant or that a suspect's statement is unclear or convoluted.

Chairul Huda provides a more profound explanation regarding the concept of 'Judging Opinion.' He asserts that journalists must be capable of 'packaging' the information conveyed to and from the public in a manner that ensures allegations regarding a specific 'legal status' do not transform into a form of 'judgment' or a presumption of guilt. Consequently, it is imperative for the media to comprehend legal terminology that carries specific connotations, such as: 'suspected' (disangka), 'indicted' (didakwa), 'prosecuted' (dituntut), 'sued' (digugat), 'litigated' (diperkarakan), 'under inquiry' (diselidiki), 'under investigation' (disidik), 'accused' (dituduh), 'strongly suspected' (diduga keras), 'based on preliminary evidence' (berdasarkan bukti permulaan), 'upon sufficient evidence' (atas bukti yang cukup), and other relevant legal terms.

Beyond this, news headlines merit specific consideration as well. The prevailing tendency among readers to form opinions based on headlines without reading the full article makes the construction of headlines a critical aspect of news reporting. Consequently, headlines must remain consistent with the actual content of the news, despite the recognized reality that certain headlines are crafted specifically to immediately capture the public's interest

However, there are differing perspectives regarding how media reporting should be regulated. According to George L. Reedy, press freedom is seen as an integral component of a philosophy of life, as it represents a manifestation of the principle of liberty. A free press can only flourish within a free society, whereas it inevitably vanishes under oppression. This view is further supported by Roger Fisher, who cites the 1765 writings of William Blackstone, an eminent English legal scholar: "The liberty of the press... consists in laying no previous restraint upon publications." The form of freedom emphasized by Reedy and Fisher suggests a broad latitude for journalists to exercise their own judgment regarding a case. It posits that the media should be permitted to advocate for its own version of 'justice,' even if it is not aligned with the prevailing legal framework (Huda, 2010, p. 12). Justice does not always coincide with legal legality; therefore, the media should not be restricted in forming assessments of a case and may even offer its own form of justice to the public.

A distinct perspective is provided by Professor Padmo Wahyono, who argues that trial by the press is a practice that must be strictly avoided in reporting worldwide. He posits that reporting which 'convicts' an individual is not only detrimental to the suspect but also constitutes a subversion of the constitutional system. According to Wahyono, trial by the press can be viewed from two dimensions: first, as the media exercising unrestrained judgment over an individual, thereby contradicting personal

liberty; and second, as a free media attempting to interfere with or influence the independence of the judiciary. He further emphasizes that Article 24 of the 1945 Constitution mandates that no judicial power shall be granted outside the judiciary. Consequently, trial by the press is an unconstitutional act that violates the fundamental principles of the state.

In the Yana Mulyana case, mass media coverage surrounding the corruption allegations fostered a public perception that directly led to the practice of trial by the press. This is substantiated by the analysis conducted on the selected samples. Based on the three news samples, each headline steered the public toward the perception that Yana Mulyana had already been convicted, despite the legal proceedings still being in progress.

The headlines treated the suspect as if his guilt were an established fact, even though the court's verdict was not delivered until December 6, 2023—long after these articles were published. Furthermore, proper legal terminology was not fully utilized in the reporting. In several instances, the proportion of subjective opinion outweighed the actual facts presented by the journalists. Consequently, the media's framing created a narrative that deviated from the objective reality. Analysis using the four framing devices confirms that the journalists conflated facts with opinions.

In this case, Yana Mulyana's reputation and honor were tarnished by irresponsible framing from online media outlets. The violation of the 'Judging Opinion' principle—which is intrinsically linked to the presumption of innocence—constitutes a form of trial by the press. This raises a critical ethical question: if the media's framing is flawed and the defendant is ultimately acquitted, what becomes of their fate? Such circumstances necessitate that mass media exercise greater caution when covering suspects or defendants. Media outlets must strictly uphold the presumption of innocence in accordance with established guidelines and regulations, avoiding the tendency to act as a 'parallel court' or engage in journalistic vigilantism

4. CONCLUSION

The power of mass media framing significantly steers public perception toward specific issues. Based on the research findings regarding the Yana Mulyana corruption case, the author identified media framing within the news coverage. This framing is clearly visible in news headlines through syntactic aspects, such as the information presented, the background provided, and the choice of leads. Regarding the script aspect, the narrative consistently emphasizes the suspect's guilt prior to a court verdict. Thematically, specific themes are highlighted for emphasis, while rhetorically, the use of images and idioms directs the framing—specifically on ayobandung.com—toward an assumption of Yana Mulyana's guilt.

The frame presented by the media appears to perform its own 'judgment' before a legally binding court verdict (*inkracht*) is reached, resulting in a trial by the press against Yana Mulyana. The presumption of innocence, enshrined in the Journalistic Code of Ethics and the 1999 Press Law, classifies such 'judgmental' reporting as a

violation of the right to a fair trial. Tendentious reporting aimed at forming public perception of a suspect's guilt violates the principle of the rule of law, specifically the independent judicial power guaranteed by the 1945 Constitution.

The boundaries of the presumption of innocence must be clarified through analytical methods like framing to prevent the occurrence of a 'trial by the press.' The Yana Mulyana case serves as a prime example of this phenomenon, alongside other cases that remain undisclosed. Consequently, framing that constructs public perception of guilt before a final and binding judgment is a constitutional violation and represents the conflation of facts and opinions by journalists at ayobandung.com. Most critically, such media framing culminates in a trial by the press which, according to Padmo Wahyono, signifies a failure of the constitutional system.

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