

# Does Constitutional Court Decision No. 90/PUU-XXI/2023 Violate the *Nemo Judex in Causa Sua* Principle?

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## Abstract

This study addresses the problem of potential violations of the *nemo judex in causa sua* principle in Constitutional Court Decision No. 90/PUU-XXI/2023 and their implications for judicial integrity and public trust in Indonesia's constitutional system. The objective of this research is to analyze the application of the *nemo judex in causa sua* principle in the decision and to examine its impact on public confidence in the Constitutional Court, particularly in electoral judicial review cases. This study employs a normative juridical method using statutory, conceptual, and case approaches, supported by qualitative analysis of legal materials, judicial decisions, and academic literature. The findings reveal that although the principle of *nemo judex in causa sua* is normatively recognized in Indonesian law, its implementation remains insufficiently regulated, thereby creating opportunities for conflicts of interest within judicial processes. The analysis of Decision No. 90/PUU-XXI/2023 indicates indications of compromised judicial impartiality, which triggered widespread public criticism and contributed to a decline in institutional credibility. Empirical data further demonstrate fluctuations in public trust, suggesting that controversial decisions perceived as biased can significantly weaken democratic legitimacy, while decisions aligned with fairness and constitutional values tend to restore public confidence. This study highlights the urgent need for institutional reform, including the formalization of recusal mechanisms, stricter enforcement of judicial ethics, and enhanced transparency and accountability in judicial proceedings.

**Keywords:** *Nemo Judex in Causa Sua*, Constitutional Court, Judicial Impartiality, Public Trust

## Introduction

The Constitutional Court (*Mahkamah Konstitusi*) constitutes one of the judicial institutions within the judicial branch, functioning as the guardian of the Constitution. Its role is not only to ensure that all statutory laws and regulations are consistent with the Constitution, but also to uphold constitutional justice in safeguarding the rights of citizens against potential abuses of power by the government or other institutions (Christia et al., 2024). Since its establishment in 2003, the Constitutional Court has assumed a crucial position within Indonesia's constitutional system, serving as the final bastion to ensure that all legal products conform to the *1945 Constitution of the Republic of Indonesia (UUD NRI 1945)* (M. Reza Saputra & Taufiqurrohman Syahuri, 2024). Its authority to conduct judicial review of statutes against the Constitution renders it a highly strategic institution in maintaining the principle of constitutionalism (Anggreni et al., 2024).

However, in performing its functions, the Constitutional Court frequently encounters complex challenges within the judicial sphere, particularly when adjudicating politically sensitive cases, such as judicial review of electoral laws (Yuliana et al., 2024). One fundamental principle is the doctrine of *nemo judex in causa sua* (no one shall be a judge in his own case), which represents a cornerstone of a fair, certain, and beneficial judicial system. In essence, a judge must not possess any personal interest in the case being adjudicated, especially in relation to familial ties. Within the constitutional domain, this principle becomes particularly critical, given that the Constitutional Court often handles cases involving political interests and power, especially in electoral disputes (Nugraha et al., 2024). The integrity and independence of constitutional judges are therefore essential to ensure that judicial decisions are grounded in justice and remain impartial, free from alignment with any particular group or interest (Zaman, 2024).

A violation of the *nemo judex in causa sua* principle by the Constitutional Court would reflect a decline in its credibility as the guardian of the Constitution and would have significant implications for Indonesia's democratic system (Sulistiyowati et al., 2024). This is particularly important considering that electoral laws are intrinsically linked to democratic processes, which constitute the foundation of the nation's constitutional life. Moreover, decisions of the Constitutional Court in reviewing electoral laws do not only affect the petitioners in judicial review cases but also have broader implications for all citizens of Indonesia (Hasibuan et al., 2024). Therefore, every decision rendered by the Constitutional Court must adhere to the principles of justice, transparency, constitutional supremacy, and the application of *nemo judex in causa sua*. Failure to uphold these principles risks eroding public trust and diminishing the democratic index (Arifa et al., 2024).

A notable case that has drawn significant attention due to its far-reaching implications for Indonesia's democratic system is Constitutional Court Decision No. 90/PUU-XXI/2023 (Viedini et al., 2024). In this case, the Constitutional Court adjudicated a petition submitted by a student from Universitas Surakarta, Almas Tsaqibbirru, concerning the age requirement for presidential and vice-presidential candidates. The decision, delivered shortly before the deadline for candidate registration, was widely perceived as rushed, thereby generating both benefits and disadvantages within society (Rohmah, 2024). Substantively, the Court held that the relevant norm (*a quo*) must require candidates to be at least forty years old or to have previously held an elected public office, including regional head positions, whether in the past or present. As stipulated in the decision, the provision under Article 169 letter (q) of Law No. 7 of 2017 applies starting from the 2024 presidential and vice-presidential elections (Subandri, 2023).

The controversy surrounding Constitutional Court Decision No. 90/PUU-XXI/2023 has attracted substantial criticism from academics and legal practitioners in Indonesia, as it is alleged to have violated the principle of *nemo judex in causa sua*. The decision is considered to have benefited one particular candidate pair, especially the vice-presidential candidate Gibran Rakabuming

Raka, who is the son of the President and the nephew of the Chief Justice of the Constitutional Court, Anwar Usman, in the case No. 90/PUU-XXI/2023 (Wahyuni Dekananda & Syahputra, 2024). Consequently, the decision is argued to have deviated from procedural legal standards in theory and to have violated the *nemo iudex in causa sua* principle by favoring personal, familial, or group interests. From a theoretical perspective, this principle is universally recognized as a fundamental requirement for a fair and transparent judicial system. Therefore, the case of Constitutional Court Decision No. 90/PUU-XXI/2023 serves as a critical reflection for strengthening the independence and impartiality of the Constitutional Court as a judicial institution in the future (Valenci, 2024).

Previous studies addressing the principle of *nemo iudex in causa sua* include: (1) Petrus Antonius Lela Udak, Katon Y. Stefanus, and Rafael R. Tupen (2024), who examined the importance of applying this principle in judicial review before the Constitutional Court (Udak et al., 2024); (2) Muh Alghifari, Andi Agung Mallongi, and Nuraiman (2024), who analyzed the establishment of *ad hoc* constitutional judge panels in judicial review proceedings (Alghifari et al., 2024); (3) Anggar Putra and Saiful (2024), who investigated conflicts of interest involving the Chief Justice in Decision No. 90/PUU-XXI/2023 (Anggar Putra & Saiful, 2024a); (4) Naufal Bima Zaki Putra Yasin and Lutfian (2024), who explored violations of judicial ethics in the same decision (Yasin & Ubaidillah, 2024a); and (5) Pramesti Ratu Fiqih, Adellia Mahardhika Widodo, and Anisa Miftahul Firdaus (2024), who assessed the application of the rule of law principle by the Constitutional Court as the guardian of the Constitution in the context of Decision No. 90/PUU-XXI/2023 (Fiqih et al., 2024).

Building upon these prior studies, this research distinguishes itself by specifically analyzing the existence of legal conflicts and violations of the *nemo iudex in causa sua* principle in Constitutional Court Decision No. 90/PUU-XXI/2023, as well as its implications for the declining credibility of the Constitutional Court. This study not only offers a theoretical perspective but also provides recommendations to strengthen the independence and impartiality of the Court, including the reinforcement of stricter judicial ethics and reforms in the selection system of constitutional judges.

This research contributes to the development of constitutional law scholarship in Indonesia, particularly in relation to the application of the *nemo iudex in causa sua* principle in electoral judicial review. The recommendations generated are expected to serve as valuable input for relevant stakeholders. However, this study is limited to the Indonesian context, focusing specifically on the judicial institution of the Constitutional Court in reviewing electoral legislation. Based on the foregoing background, the research questions addressed in this study are: (1) How is the principle of *nemo iudex in causa sua* applied in Constitutional Court Decision No. 90/PUU-XXI/2023? and (2) What are the implications of the application of this principle in enhancing public trust in the Constitutional Court in adjudicating electoral judicial review cases?

## Research Method

This study employs a normative juridical research method, which focuses on the analysis of legal norms embodied in statutory regulations, judicial decisions, and legal doctrines (Disemadi, 2022). It adopts a statutory approach to examine legal provisions relevant to the judicial review of electoral laws, particularly in the context of Constitutional Court Decision No. 90/PUU-XXI/2023. This approach involves a systematic review of the contested legislation, its implementing regulations, and the Constitution as the primary normative framework.

In addition, this research utilizes a conceptual approach to analyze the underlying legal principles that inform the study, including the doctrine of *nemo iudex in causa sua*, the principle of procedural justice, and judicial independence. This approach facilitates a deeper understanding of the philosophical and theoretical foundations that underpin the application of these principles within judicial practice (Tan, 2021). Furthermore, a case approach is employed to examine Constitutional Court Decision No. 90/PUU-XXI/2023 as the principal case study. This approach enables the researcher to conduct an in-depth evaluation of the application of the *nemo iudex in causa sua* principle, as well as to identify potential conflicts of interest and their legal implications.

This research is qualitative in nature, meaning that the data collected and analyzed are non-numerical, consisting of judicial decisions, legal documents, and academic literature. The qualitative analysis is conducted through descriptive and interpretative methods to capture the legal dynamics and the broader socio-legal context surrounding the case under examination (Benuf & Azhar, 2020).

## Results and Discussions

### Application of the *Nemo Judex in Causa Sua* Principle in Constitutional Court Decision No. 90/PUU-XXI/2023

The Constitutional Court (*Mahkamah Konstitusi*) was established pursuant to Article 7B, Article 24 paragraph (2), and Article 24C of the *1945 Constitution of the Republic of Indonesia (UUD NRI 1945)* following the Third Amendment, and further refined through the Fourth Amendment (Ramadhan & Donri, 2024). Its establishment was mandated under the Transitional Provisions of Article III of the Constitution, which required the Court to be formed no later than 17 August 2003, leading to the enactment of Law No. 24 of 2003 concerning the Constitutional Court on 13 August 2003 (Saragih et al., 2024). The Constitutional Court exercises five principal functions: as the guardian of the Constitution, the final interpreter of the Constitution, the protector of human rights, the guardian of citizens' constitutional rights, and the defender of democracy (Kansil & Nuzan, 2024). Its duties and authorities are stipulated under Article 24 paragraphs (1) and (2) of the *UUD NRI 1945* and further elaborated in Article 10 paragraph (1) of the Constitutional Court Law, including the authority to review statutes against the Constitution, resolve disputes between state institutions, adjudicate the dissolution of political parties, resolve electoral disputes, and decide cases concerning alleged violations by the President and/or Vice President (Purba, 2024).

In exercising its authority, the Constitutional Court is also governed by Law No. 8 of 2011, which amends Law No. 24 of 2003 on the Constitutional

Court (Pratama & Kadir, 2025). This legal framework reinforces the Court's position as the *guardian of the constitution* and the *guardian of democracy*. The Court plays a central role in ensuring that all statutory regulations comply with the Constitution and that democratic processes are conducted in a fair and just manner, particularly in the electoral context (Fatriansyah, 2024).

To ensure the realization of fair and just democratic processes, constitutional judges are required to adhere to the principle of *nemo judex in causa sua*, a fundamental doctrine within the judicial system, meaning that “no one shall be a judge in their own case” (Bahri, 2024). This principle serves as a critical foundation for maintaining judicial impartiality and objectivity. Within constitutional law, the *nemo judex in causa sua* principle ensures the realization of justice in judicial decision-making (Alghifari et al., 2024). Judicial decisions must therefore be free from conflicts of interest or bias. This principle represents a manifestation of a fair trial, as also recognized in various national legal instruments. At the national level, it is codified in Law No. 48 of 2009 on Judicial Power (Anggar Putra & Saiful, 2024b).

Implicitly, the principle of *nemo judex in causa sua* is firmly embedded in Article 17 paragraph (5) of Law No. 48 of 2009, which stipulates that judges are obliged to recuse themselves if they have a conflict of interest with any party involved in a case (Putri Octaviani, 2024). Additionally, ethical guidelines and judicial codes of conduct emphasize that judges must uphold independence and impartiality in adjudicating cases (Yasin & Ubaidillah, 2024b). Nevertheless, although such regulations are acknowledged as essential components of judicial impartiality, the mechanisms for implementing the *nemo judex in causa sua* principle remain insufficiently explicit and comprehensive. Consequently, there remains a potential for violations of this principle within judicial proceedings (Rahman et al., 2024).

Furthermore, judicial independence and impartiality are reinforced through Constitutional Court Regulation No. 09/PMK/2006 concerning the Declaration of the Code of Ethics and Conduct of Constitutional Judges, which affirms that independence is a fundamental prerequisite for the realization of the rule of law and the administration of justice (Fiqih et al., 2024). This principle

must be reflected in all judicial processes, ensuring that judges and courts remain free from external influence, including political, economic, or social pressures, whether in the form of persuasion, coercion, threats, or promises of personal gain.

The implementation of this regulation requires judges to exercise their judicial functions independently, based on objective assessment of facts and legal realities, free from interference by any party, including colleagues, while maintaining high standards of conduct to strengthen public confidence in the judiciary (Qolyubby & Hadi, 2024). However, Constitutional Court Decision No. 90/PUU-XXI/2023 has generated significant controversy due to alleged violations of the *nemo iudex in causa sua* principle (Aldani et al., 2024). The petition in this case concerned the judicial review of a legal norm with broad implications for public office eligibility. Concerns regarding the violation of this principle arose when one of the judges adjudicating the case was alleged to have a direct connection to the substance of the dispute, thereby undermining the independence and impartiality of the decision (Surullaha et al., 2024). Such involvement has intensified negative public perceptions regarding the integrity of the Constitutional Court as a supreme judicial body entrusted with safeguarding the Constitution.

The potential violation of the *nemo iudex in causa sua* principle not only affects the legitimacy of the decision but also undermines public trust in the independence of the constitutional judiciary (Tambunan et al., 2024). Fundamentally, citizens are entitled to a fair and impartial trial, as guaranteed by the Constitution and national legal instruments. Therefore, the Constitutional Court bears full responsibility for ensuring that judges adjudicating cases are entirely free from conflicts of interest. Violations of this principle in Decision No. 90/PUU-XXI/2023 highlight the urgent need for regulatory reform within Indonesia's constitutional system (Auliadi et al., 2024). From a human rights perspective, adherence to the *nemo iudex in causa sua* principle is integral to the realization of legal justice. Any breach not only harms the parties involved but also infringes upon citizens' constitutional rights to legal protection and justice (Wahyuni Dekananda & Syahputra, 2024). Accordingly, safeguarding fair and

legally certain judicial processes must remain a priority in all judicial proceedings, particularly those involving public interest (Wahid & Suriyanto, 2024).

In comparative perspective, other legal systems implement the *nemo iudex in causa sua* principle through formal recusal mechanisms. Recusal refers to the disqualification of a judge from a case due to potential bias, conflict of interest, or the appearance of impropriety. In jurisdictions such as the United Kingdom and the United States, recusal mechanisms are strictly regulated to prevent conflicts of interest (Mohseni, 2024). In the United Kingdom, judges are required to withdraw from cases where they have direct relationships with the parties or personal interests in the outcome. Similarly, in the United States, the Supreme Court employs internal mechanisms to assess judicial independence prior to case adjudication (Canelo, 2024). These mechanisms aim to preserve the integrity and credibility of judicial institutions.

In contrast, Indonesia does not yet possess a comprehensive recusal mechanism, thereby necessitating strict oversight by both the public and external supervisory bodies. Public participation in monitoring judicial processes constitutes a crucial mechanism for maintaining judicial integrity and independence (Fitri, 2024). Transparency in judicial appointments and effective public complaint mechanisms are essential in preventing potential violations of the *nemo iudex in causa sua* principle and in restoring public trust in the judiciary, particularly the Constitutional Court (Yunita Octa Wulandari, 2024).

The alleged violation of the *nemo iudex in causa sua* principle in Constitutional Court Decision No. 90/PUU-XXI/2023 underscores the urgent need for reform in Indonesia's constitutional judicial system. Such reforms may include the institutionalization of formal recusal mechanisms, the establishment of independent oversight committees, and the enhancement of public participation in preventing conflicts of interest. Strengthening judicial oversight mechanisms is therefore a critical step in ensuring that the judiciary remains independent, impartial, and committed to upholding the Constitution without serving personal or group interests.

**TABLE 1.** Analytical Summary of the Application of the Nemo Judex in Causa Sua Principle in Constitutional Court Decision No. 90/PUU-XXI/2023

Aspect	Description	Implications
Constitutional Foundation of the Constitutional Court	Established as the guardian of the Constitution and democracy with authority to conduct judicial review	Ensures constitutionality of laws and democratic integrity
Functions of the Constitutional Court	Guardian of constitution, final interpreter, protector of human rights and democracy	Central role in safeguarding constitutional supremacy
Principle of <i>Nemo Judex in Causa Sua</i>	No judge shall adjudicate a case in which they have a personal interest	Ensures impartiality and fairness in judicial decisions
Regulation of Judicial Impartiality	Judges must recuse themselves if conflicts of interest exist	Prevents bias and maintains judicial integrity
Judicial Ethics and Conduct	Judges must uphold independence and avoid external influence	Strengthens public trust and institutional credibility
Case Study: Decision No. 90/PUU-XXI/2023	Judicial review of presidential/vice-presidential age requirement with alleged conflict of interest	Triggered controversy and public scrutiny
Alleged Violation of Principle	Involvement of a judge with potential personal connection to case substance	Undermines legitimacy of decision
Impact on Public Trust	Decline in confidence toward Constitutional Court's independence	Weakens democratic institutions
Human Rights Perspective	Right to a fair and impartial trial is a constitutional right	Violations affect broader

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		constitutional protections
Comparative Law (Recusal Mechanism)	Formal recusal procedures in UK and US to prevent bias	Ensures higher judicial accountability
Indonesia's Limitation	Absence of comprehensive recusal mechanism	Requires stronger external oversight
Reform Recommendations	Introduce recusal rules, independent oversight, and public participation	Strengthens judicial independence and credibility

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**Source:** Developed by the author based on analyzed literature and legal materials

## **Implications of Applying the *Nemo Judex in Causa Sua* Principle in Enhancing Public Trust in the Constitutional Court in Handling Judicial Review of Electoral Legislation**

The Constitutional Court is a constitutional judicial institution vested with significant authority to safeguard and uphold the Constitution. Its functions and powers include reviewing statutes, resolving jurisdictional disputes among state institutions, and adjudicating electoral result disputes. As an institution entrusted with preserving constitutional democracy, the Constitutional Court must demonstrate independence and impartiality in every decision it renders (Devitasari, 2021). This indicates that the application of the *nemo judex in causa sua* principle, as a safeguard for judicial neutrality in examining and deciding cases, must be consistently upheld in all judicial proceedings, particularly those concerning the rights of citizens at large (Ulum & Sukarno, 2023).

The application of the *nemo judex in causa sua* principle is particularly crucial in the electoral context in Indonesia. Judicial review of electoral legislation may directly affect democratic processes. Constitutional Court judges handling electoral cases must therefore be free from conflicts of interest so that their

decisions reflect the principles of justice, legal certainty, and public benefit (Lestari, 2023). In this regard, Constitutional Court decisions may directly influence electoral outcomes, political representation, and governmental stability. Accordingly, public trust in the integrity of the Constitutional Court in adjudicating such cases is essential to maintaining legal and democratic legitimacy (Pudjiastuti, 2023).

The application of the *nemo iudex in causa sua* principle in the judicial review of electoral legislation can enhance public trust by ensuring that Constitutional Court judges do not possess personal or political interests in the cases they adjudicate (Koswara & Megawati, 2023). Judicial neutrality is a fundamental element in building public confidence in the judiciary. Maintaining public trust is also essential in the current administration of state functions. Based on survey data from the Indikator Survey Institute, the level of public trust in state institutions is as follows:

**TABLE 2.** Level of Public Trust in State Institutions in 2024

No.	Institution	Level of Trust
1	Indonesian National Armed Forces (TNI)	93%
2	President	85%
3	Attorney General's Office	69%
4	Police	67%
5	Courts, including the Constitutional Court	64%
6	People's Consultative Assembly	62%
7	Corruption Eradication Commission	61%
8	House of Representatives	58%
9	Political Parties	51%

**Source:** Indikator Survey Institute (Komara, 2024)

Based on the survey results, public trust in the Constitutional Court ranked fifth, with a trust level of 64% in 2024. Public confidence in the Constitutional Court was perceived to have declined following the issuance of Constitutional Court Decision No. 90/PUU-XXI/2023. Meanwhile, according to the

Indonesian Political Survey conducted in January 2025 using a multistage random sampling method involving 1,220 respondents, the Constitutional Court received a positive public assessment of up to 75%. This increase occurred after the Court issued Constitutional Court Decision No. 62/PUU-XXII/2024, which abolished the presidential threshold (Tempo, 2025).

The decline in public trust in the Constitutional Court following Decision No. 90/PUU-XXI/2023 demonstrates that the public is highly sensitive to the independence of this judicial institution (Tambunan et al., 2024). Decisions perceived as controversial or influenced by considerations outside legal reasoning may generate distrust and dissatisfaction among the public. Conversely, the increase in public trust to 75% following Decision No. 62/PUU-XXII/2024, which abolished the presidential threshold, indicates that the public tends to appreciate decisions perceived as strengthening democracy and advancing justice within the electoral system (Zuhdi et al., 2025).

The Constitutional Court bears a substantial responsibility in handling judicial review cases concerning electoral legislation, particularly because such cases often involve politically sensitive issues and attract the attention of various stakeholders. Without the application of the *nemo iudex in causa sua* principle, there is a significant risk of damaging public trust in every measure taken by the Court (Anggar Putra & Saiful, 2024b). Therefore, it is essential for the Constitutional Court to ensure that every judge involved in decision-making is free from conflicts of interest. Public trust in the Constitutional Court is fundamental to maintaining the rule of law and democracy. When public trust is high, the Court's decisions are more likely to be accepted and implemented by citizens (Satriawan & Lailam, 2021).

In adjudicating cases involving the rights of the public at large, the Constitutional Court must ensure that every judge participating in the decision-making process is genuinely free from conflicts of interest through fair and sustainable mechanisms. The implementation of a recusal mechanism, or judicial withdrawal from a case, must be strictly applied where there are indications of imbalance or partiality in resolving a dispute (Sholikah et al., 2023). Accordingly, the resulting decisions would be more acceptable to the public and would protect

the Constitutional Court from allegations of abuse of authority or partiality toward particular political interests.

In addition, transparency and accountability in the decision-making process are important factors in maintaining public trust in the Constitutional Court (Harlina Hamid, 2024). The public should be provided access to court proceedings, legal arguments, and the considerations underlying each decision. Through transparency of information, citizens can assess whether decisions are based on objective legal reasoning and are free from external influence (Taufik et al., 2024). Strengthening the ethics and code of conduct of constitutional judges must also be prioritized. Every constitutional judge must uphold the principles of independence, impartiality, and professionalism in carrying out judicial duties. Violations of these principles must be addressed firmly through effective oversight mechanisms, both internally within the Constitutional Court and externally through institutions such as the Judicial Commission (Ning Ayunda Chofifi & Eny Kusdarini, 2024).

With a strong oversight system, the Constitutional Court can ensure that every judge adjudicating a case acts solely in the interest of law and the Constitution, rather than in the interest of individuals or particular groups. In conclusion, public trust in the Constitutional Court is a vital asset in maintaining legal and democratic legitimacy in Indonesia (Afriman Oktavianus et al., 2024). The application of the *nemo judex in causa sua* principle is therefore central to ensuring that every decision issued by the Constitutional Court is free from conflicts of interest and is grounded solely in justice and constitutional principles (Tandi et al., 2024). By maintaining transparency and accountability, while strengthening oversight over constitutional judges, the Constitutional Court can preserve and enhance public trust, thereby ensuring that its decisions are accepted and effectively implemented in the constitutional life of the nation.

## Conclusion

This study concludes that the application of the *nemo judex in causa sua* principle within the Constitutional Court is of paramount importance in safeguarding the integrity and independence of the judiciary. Constitutional

Court Decision No. 90/PUU-XXI/2023 indicates the existence of potential violations of this principle, which may undermine public trust in the institution. In the electoral context—where judicial decisions may significantly influence democratic processes and political representation—it is imperative for the Constitutional Court to ensure that every judge involved in decision-making is entirely free from conflicts of interest. Accordingly, judicial reforms, including the institutionalization of recusal mechanisms and the strengthening of oversight systems, are necessary to prevent violations that could diminish the Court's credibility.

Furthermore, transparency and accountability in the Constitutional Court's decision-making processes must be enhanced to restore and strengthen public trust. The public has the right to access information regarding judicial proceedings and the legal reasoning underpinning each decision. Such transparency enables society to assess that decisions are based on objective and fair legal considerations, rather than political interests. In addition, strengthening judicial ethics and codes of conduct must be prioritized to ensure that all constitutional judges remain committed to the principles of independence, impartiality, and professionalism. Through these measures, the Constitutional Court can maintain its legitimacy and public confidence, thereby ensuring that its decisions are widely accepted and effectively implemented within the constitutional and democratic framework of the state.

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## Declaration of Generative AI Use

The author(s) declare that no generative AI or AI-assisted technologies were used in the preparation or writing of this manuscript. All content was produced entirely by the author(s) without any automated assistance.

## Competing Interest

None.