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Juridical Analysis of the Judge'S Decision in the Narcotics Courier Case (Study of Decision Number 28/Pid. Sus/2025/Pn Sng)

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Abstract: Law enforcement against narcotics crimes in Indonesia is a complex and crucial issue, especially for perpetrators who act as drug couriers. This study aims to analyze the legal considerations used by judges in sentencing narcotics courier fraudsters, focusing on Decision Number 28/Pid.Sus/2025/PN Sng. Based on the results of a survey by the National Narcotics Agency (BNN), an average of 50 people die each year due to drugs. This means that around 18,000 people die per year from smoking. The approach used is normative juridical, by examining laws and regulations, legal literature, and court decisions. This study is descriptive qualitative in nature, aiming to provide an understanding of the application of Article 114 Paragraph (2) of Law No. 35 of 2009 concerning Narcotics in judicial practice. The results of the study show that in sentencing, judges consider various aspects, such as the role of fraudsters in the narcotics distribution network, the amount of evidence, and cooperative attitudes in selling narcotics. Although the legal provisions regulate severe sanctions against perpetrators of drug trafficking, there is still room for judges to proportionally assess the role of couriers in a crime. This analysis is expected to contribute to the development of criminal law, especially in creating a fair and effective justice system in members of drug crimes.

Keyword: Drug Crimes, Couriers, Legal Analysis.

INTRODUCTION

Narcotics crimes are a form of crime that has a huge impact, both on individuals, communities, and the state. Narcotics abuse not only damages the physical and mental health of its users, but also disrupts social, economic, and public order stability. In the Indonesian context, the problem of narcotics has become a serious problem that requires special attention, both in the realm of law enforcement and prevention efforts.

To overcome this problem, the Indonesian state through applicable legislation, namely Law Number 35 of 2009 concerning Narcotics (hereinafter referred to as the Narcotics Law) has established strict legal rules in eradicating the circulation and abuse of narcotics. One of the articles that regulates sanctions against perpetrators of narcotics crimes is Article 114 Paragraph

(2) of the Narcotics Law, which focuses on the circulation of narcotics in certain quantities and provides the threat of severe punishment.

Article 114 Paragraph (2) of the Narcotics Law states that a person who without rights or against the law is involved in class I narcotics transactions in the amount of more than five grams will be subject to a very long prison sentence, even a life sentence. In this case, the sanctions applied include not only long prison sentences, but also huge fines. These harsh sanctions are intended to provide a deterrent effect for perpetrators and as a form of protection for the public from the dangers of narcotics. However, the application of the provisions in Article 114 Paragraph (2) of the Narcotics Law in judicial practice still raises various legal problems, both in terms of interpretation of legal norms, the application of appropriate punishments, and the evidentiary process in narcotics cases. Therefore, it is important to conduct an in-depth study of how Indonesian law regulates narcotics crimes and how to implement these provisions in judicial practice.

The Indonesian government has shown its seriousness in eradicating narcotics abuse, considering the condition of the country which is currently in a narcotics emergency status. The high death rate due to drug abuse is a major concern, with victims not only coming from adults, but also teenagers and even children. One of the extreme measures taken by the government is the imposition of the death penalty for drug dealers and dealers. However, the application of these heavy sanctions caused controversy in the community, even triggering criticism from the international community. Komnas HAM, for example, expressly rejects the death penalty, arguing that it is contrary to the principles of human rights as stipulated in the 1945 Constitution and the law on human rights. Instead, supporters of the death penalty emphasize the importance of protecting the public from the dangers of narcotics that have taken many victims. Therefore, in facing this debate, a wise attitude is needed so that a fair common ground is found regarding the implementation of the death penalty for narcotics traffickers. (Anang Iskandar, 2019)

Legally, Indonesia still recognizes the existence of the death penalty as a form of legal sanction, which is applied to extraordinary crimes such as premeditated murder, terrorism, corruption, and narcotics crimes, as regulated in the applicable laws and regulations. On the other hand, the most fundamental human right is the right to life, which is considered a gift of God that cannot be arbitrarily deprived. Therefore, actions that take a person's life, including the death penalty, can only be justified if they are carried out according to the law and through a fair process. The death penalty should also be the last option taken after going through a strict legal mechanism. Even in its implementation, prisoners sentenced to death still have the right to apply for clemency, pardon, postponement, or conversion of sentences after a certain period of time.

On the other hand, narcotics consist of various types that can generally be categorized into two, namely natural and synthetic narcotics. Although natural narcotics still dominate, the trend of use and production of synthetic narcotics shows a significant increase, along with technological advances that facilitate the process of illegal production and distribution. Many natural substances can now be engineered into synthetic versions with similar effects. This development has led to the continued emergence of new synthetic narcotics variants, so regulations and policies to counter them need to be continuously updated to remain effective in responding to existing challenges. In terms of distribution, there are many ways that can be penetrated, one of which is to distribute the substance from one location to another, usually through illegal channels. These procedures often involve intermediaries, hidden transportation routes and the use of protected communications to conceal the activity. In this case, of the 271 million abusers in 2017, most of them are still dominated by Cannabis abusers, which includes 188 million people. Cannabis is a type of narcotic derived from plants of the genus *Cannabis*. This group includes the cannabis species (*Cannabis Sativa*), popularly also called marijuana. (Khalsa, J. H., 2007)

Plant experts say that Cannabis actually consists of only one species, namely Cannabis Sativa. L., but has two subspecies, namely Cannabis Sativa and Cannabis Indica and there are four varieties. Cannabis can be grown in almost every country in the world. Meanwhile, opioids are one of the most widely used pain relievers in the world of medicine (prescription drugs). However, because it has a hallucinating effect of feeling happy, many use it for pleasure purposes. The drug is made from the opium plant or synthesized in a laboratory. It is addictive. Included in this group are opiates, which are types of opioids such as heroin. Cocaine is an addictive drug derived from coca leaves. In fact, the most abused type of narcotics after marijuana are stimulants, with total users reaching around 68 million people in 2017. However, because the pattern of stimulant use varies from country to country, a report from the UNODC (United Nations Office on Drugs and Crime) divides this group of stimulants into several categories, namely amphetamines and prescription stimulants, cocaine, and ecstasy.

Through this juridical review, the author will examine aspects related to the perpetrators of narcotics crimes, especially those regulated in Article 114 Paragraph (2) of the Narcotics Law. Decision No. 28/Pid.Sus/2025/PN Sng is one of the objects of study in this study. This decision is a clear example in the application of Article 114 Paragraph (2) of the Narcotics Law which can provide a clear picture of how judges in district courts assess and decide narcotics cases, as well as how the legal process runs in dealing with perpetrators of narcotics crimes. Through this study, the author hopes to reveal the extent to which justice can be achieved in law enforcement against narcotics offenders, as well as an evaluation of the suitability between legal provisions and judges' decisions. In the context of criminal law, it is important to examine whether the sanctions given are in accordance with the principles of justice, proportionality and effectiveness in reducing the impact of narcotics trafficking in the community. This analysis includes an understanding of the legal substance contained in the article, as well as its implementation in judicial practice based on relevant decisions. Thus, this research is expected to provide broader insights into legal protection for the community and efforts to commit narcotics crimes more effectively.

What are the factors that are the basis for the consideration of the panel of judges in giving a verdict against the perpetrator who is legally and convincingly proven to carry out the transaction of buying and selling narcotics.

METHOD

1. Approach Method

In this study, the author uses a normative juridical approach which is an approach through literature study by examining laws and regulations, court decisions, and theoretical concepts in the field of law. This approach was chosen because the research focuses on the analysis of primary data in the form of the Subang District Court's decision related to the case of narcotics crimes. Through a normative juridical approach, the research can comprehensively analyze legal regulations that are relevant to legal events that occur in the case under study, as well as delve deeper into the application of legal norms in judicial practice.

2. Research Specification

The specification of this research is qualitative descriptive. The descriptive research aims to provide a clear and systematic picture of the legal phenomena that occur, especially regarding the case of couriers in the illicit narcotics trade. Meanwhile, the qualitative aspect in this study is intended to analyze and explain the factors underlying the decision on couriers who have helped carry out a person in carrying out narcotics buying and selling transactions.

3. Data Types and Sources

In this writing, the data used comes from primary and secondary data. Primary data was obtained directly from the Subang District Court's decision related to narcotics crime cases. Meanwhile, secondary data includes the results of literature studies and documents that have been available, both in the form of books, papers, and other literature. The legal materials used

consist of three categories, namely primary legal materials such as the Narcotics Law and other relevant regulations; secondary legal materials in the form of legal literature, scientific journals, and expert opinions; and tertiary legal materials that include legal dictionaries, encyclopedias, and reference sources that explain other legal materials.

4. Data Collection Techniques

Data collection in this study was carried out through:

- a. Study of documents: review of court decisions, laws and regulations, literature, scientific journals and articles related to narcotics abuse.
- b. Literature study: researching and analyzing various written sources that are relevant to the research problem.

RESULTS AND DISCUSSION

Case Studies

Drugs are an abbreviation for narcotics and dangerous drugs, although there are also those who interpret them as narcotics, psychotropics, and addictive substances. In KBBI, narcotics are defined as drugs that function to calm nerves, relieve pain, cause drowsiness, or provide stimulating effects, such as opium and marijuana. (Narcotics (n) in the Great Dictionary of the Indonesian Language, KBBI Online). Broadly speaking, the definition related to narcotics has been regulated in Article 1 number 1 of the Narcotics Law. That narcotics are substances that can affect consciousness, relieve pain, and cause dependence. (Article 1 number 1 of Law of the Republic of Indonesia Number 35 of 2009 concerning Narcotics).

The modus operandi in drug trafficking is currently increasingly complex and sophisticated, making it difficult for law enforcement officials to dismantle narcotics syndicate networks. Therefore, in determining a person's responsibility for these criminal acts, prudence and precision are needed so that the law enforcement process still upholds the principles of justice and does not harm the innocent party.

The definition of a courier is an individual who works officially for a freight forwarding service company that is registered and recognized by the government whereas in this case study, an individual who carries out goods delivery activities without an official permit or is involved in the delivery of illicit goods, such as narcotics. Couriers are often positioned as "people who store, control, or carry" so they are subject to the same crime. In fact, in reality, couriers are often used by narcotics syndicates because of their economically and legally vulnerable position. The problem of the rampant circulation of narcotics, which is felt to be so free and widespread at this time, is no longer an open secret to the public. The network related to narcotics trafficking is increasing every day, various problems can be caused by this.

In the opinion of Soedjono Dirdjosisworo, the use of narcotics without proper supervision and control is referred to as abuse, which has a very dangerous impact on the lives of individuals, society, and the state. (Soedjono Dirdjosisworo, 1990) There are various reasons that encourage someone to be involved in narcotics crimes, one of which is economic pressure. In difficult conditions, some people choose to become drug dealers as a shortcut to earn money in return for the promised rewards. (Lysa Angrayni and Yusliati, 2018) In order to avoid detection by the authorities, the perpetrators of narcotics crimes often carry out their actions behind closed doors, only certain people can enter their networks.

The modus operandi of narcotics crime in Indonesia has also undergone a significant evolution. Initially, the circulation was carried out directly between the seller and the buyer, like ordinary goods transactions. However, along with the advancement of the times, especially in information technology, drug trafficking networks have become more complex and organized, with communication systems that are closed and disconnected. (Zainab Ompu Jainah, 2013)

Regarding the term courier, historically this word comes from the Latin *curre* which means to run. The term later evolved in English to courier, and in French to *courier* or *coursier*.

In the past, a courier was tasked with delivering a message on a run, as Pheidippides did in Greek history, who ran 26 miles from Marathon to Athens to bring news of victory over Persia in 490 BC. In addition to humans, animals such as horses and pigeons are also used to convey messages.

The role of couriers today is very different. Modern couriers are no longer required to have a strong physique, but only need a vehicle and a smartphone. Courier work is now more practical, fast, and safe, and can be done by individuals and companies. However, the courier referred to in this context is not an ordinary delivery service courier, but an individual assigned by the controller of a drug network to deliver the illicit goods.

In Indonesia, narcotics couriers can move by sea, land, or air. They are the most vulnerable part of the narcotics distribution chain because they are directly related to evidence. That is, they store, carry, or possess narcotics, which makes their position the most risky to arrest by the authorities. However, many couriers continue their work because they are tempted to pay, even though the amount is not worth the risk. Couriers at the lower level are only paid hundreds of thousands of rupiah for each transaction, while international couriers who smuggle large amounts can receive higher rewards.

From this description, it can be concluded that the courier in the narcotics crime is an individual who is in charge of delivering narcotic goods in the context of transactions, and for his actions, he gets a reward in the form of money, goods, or certain facilities promised by the controller. This role is included in the legal realm as regulated in Article 114 paragraph (1) of the Narcotics Law. In Article 114 Paragraph (1) the element of being an intermediary in buying and selling, this can be equated with the term courier. (hukumonline.com/klinik/detail/lt52f93ee68a431/perlindungan-hukum-bagi-anak used as a courier-narcotics accessed on May 12, 2025, at 9:49 p.m.)

The identity of the courier who has helped someone in the transaction of buying and selling narcotics is contained in Decision No. /Pid.Sus/2025/PN Sng as follows:

1. Full name : YOFAN NICO FAHRIZA Alias BOY Bin LILI CANDRA (Alm)
2. Place of Birth : Pematang Siantar;
3. Age/Date of Birth : 39 years/May 30, 1985;
4. Gender : Man;
5. Address : Hamlet I Rt 001 Rw 002 Pegangan Lor Village, Kapetakan District, Cirebon Regency;
6. Work : Self employed;

In areas with high unemployment rates, some people often take shortcuts to meet their living needs, as well as a lack of understanding of the law so that they do not know the real risk whether the work is risky or not. The problems that occur in the community related to the economy are increasing, therefore it is not surprising that people are now competing to get money quickly even though they violate the applicable rules such as being narcotics couriers, even this does not rule out the possibility of being done in groups, not only individually. The need for fast money and the absence of jobs make a person make his choice in helping someone commit crimes, including couriers in buying and selling narcotics. But whatever the reason, becoming a drug courier is a serious crime that has an impact on yourself, your family and the community.

Implementation of Criminal Sanctions for Drug Couriers

Sanctions in criminal law have an important role because they reflect the social and cultural values embraced by a nation. Criminal punishment basically contains the public's view of what is considered right or wrong, as well as what can or cannot be done. This punishment is reactive, given after a person has committed a mistake, with the aim of causing a deterrent

effect through the suffering inflicted. The sentencing of drug abusers is inseparable from the penal system that applies in Indonesia.

Basically, the penal system is part of the law enforcement efforts carried out by judicial institutions through criminal rules related to the abuse and circulation of narcotics. Although the dangers of drugs have been voiced continuously, the reality is that the impact has not been enough to make the perpetrators stop. Based on BNN data, every day an average of 50 people die from drugs, or around 18,000 deaths per year caused by its abuse. (Soyka, 2006).

As for the case in Decision No. 28/Pid.Sus/2025/PN.Sng, on Sunday, October 6, 2024, initially when the Defendant was at home with an address in Hamlet I Rt 01/02, Pegagan Lor Village, Kapetakan District, Cirebon Regency on Sunday, October 06, 2024, Mr. JOY NANTOSO contacted and offered to take methamphetamine-type narcotics in the Karawang area, then promised the Defendant that he would give a wage of Rp2,000,000,- if the methamphetamine narcotics had been successfully taken by the Defendant then the Defendant stored it again by way of a sticky system or put it in the Cirebon area.

Then because the Defendant did not have a job and was tempted by the promised money, the Defendant accepted the offer from Mr. JOY NANTOSO, then the Defendant was willing to do according to the offer from Mr. JOY NANTOSO Shortly afterwards, Mr. JOY NANTOSO sent a Google Map share loc and a picture of the location or storage of goods in the form of methamphetamine stored with a map/paste system in the Karawang area, Sunday, October 06, 2024 at 08.00 WIB.

The defendant departed using public transportation to pick up goods in the form of methamphetamine, and after approaching the point or share loc Google map of the location or storage of goods in the form of methamphetamine-type narcotics at 09.40 WIB The defendant got off from public vehicles, then walk according to the direction of the Google map loc share and after arriving at the Google map loc share point, precisely at the Small Apartment On the Edge of the Al-Wasthiyah Mosque which is located in South Pangulah Village, Kota Baru District, Karawang Regency.

The defendant managed to find and take the methamphetamine type narcotics which were stored in a road hole with a red brick cover and the initial form of methamphetamine that the defendant took was in the form of 1 clear plastic clip package containing methamphetamine put into 1 wrapped Hmin Bold cigarettes and wrapped them using 1 green plastic bag, then after the Defendant managed to take it, the methamphetamine the Defendant put in the right front pants pocket that the Defendant was wearing, then the Defendant looked for a public vehicle back to return to the Defendant's house which was located at Hamlet 1 Rt 01/02 Pegagan Lor Village, Kapetakan District, Cirebon Regency but on the way precisely on the side of the Pantura road which was located in Kedung Gede Hamlet Rt 01/02 Mulyasari Village, Kec Pamanukan Subang Regency, the public vehicle that the Defendant was riding was stopped by police officers and conducted a search of the body and clothes that the Defendant was wearing, then the Defendant was known to have brought goods in the form of 1 package of clear plastic clips containing methamphetamine beforehand.

That based on the Minutes of Laboratory Examination Results No. 5676/NNF/2024 dated November 4, 2024, after an examination of plastic clip evidence containing 1 package of white crystalline gasoline plastic with a total net weight of 8,0261 grams, it was concluded to be positive (+) containing methamphetamine registered in Group 1 of the Narcotics Law and the Indonesian Minister of Health Regulation No. 4 of 2021.

That the Defendant does not have a license to offer to sell, sell, buy, become an intermediary in buying and selling, exchanging, handing over, or receiving Class I Narcotics.

Decision No. 28/Pid.Sus/2025/PN Sng on Sunday, October 06, 2024 at 11.00 WIB, officers from the Subang Police together with several members, including Mr. Aep Saepudin, Mr. Responsible Wicakosnono, Mr. Adrianus Novera Gultom, and assisted by Members of the Pamanukan Police arrested the defendant, Yofan Nico Fahriza while in a public vehicle in the

form of a bus that was passing on Jalan Pantura, allegedly wanted to bring methamphetamine-type narcotics to Cirebon. That the officer asked for the help of the Pamanukan Police Member to stop the bus, and after the bus stopped, the officer conducted a search of the Defendant. That from the results of the search, it was found that 1 clear plastic clip package containing methamphetamine was stored by the Defendant in the right front pants pocket that he was wearing; That the methamphetamine was packaged in 1 pack of Hmin Bold cigarettes and wrapped again with 1 green plastic bag. On April 23, 2025, the defendant was sentenced to 9 years in prison and a fine of Rp.1,000,000,000.- subsidy of 6 months in prison.

A person can become a narcotics courier for a variety of reasons that are often complex and interrelated. Looking at economic problems, there is a lot of poverty and unemployment in Indonesia and is often the main trigger for a person to do various ways to earn money and the lack of access to decent legal work also makes some people look for quick alternatives even though it is risky. In this case, sometimes many people who are Narcotics couriers do not fully understand the severe legal consequences for their role. The lack of education also makes those who are narcotics couriers easily manipulated or trapped by a larger network of traffickers. Even in addition to economic factors, there are also those who are not initially involved but are slowly dragged into the network without realizing it.

Juridical Analysis of the Judge's Decision in Case Number 28/Pid.Sus/2025/PN Sng

The judge's decision in the narcotics criminal case on behalf of Yofan Nico Fahriza alias Boy bin Lili Candra (deceased) stated that "the defendant was legally and convincingly proven to have committed a criminal act of being an intermediary in the sale and purchase of class I narcotics not plants weighing more than 5 grams without rights and against the law, as stated in the first alternative indictment from the public prosecutor."

For this act, the panel of judges sentenced him to 9 years in prison and a fine of Rp1,000,000,000.- If the fine is not paid, it will be replaced with imprisonment for 6 months. The period of detention and arrest that has been served by the defendant will be counted as part of the sentence. The judge also ordered that the defendant remain in custody and ruled that evidence in the form of narcotics weighing 8.03g, one green plastic bag, one pack of HMIN BOLD cigarettes, and one unit of Vivo brand mobile phone and its driver's license card were confiscated and destroyed.

In considering the verdict, the judge stated that the elements in Article 114 Paragraph (1) of the Narcotics Law had been fully fulfilled. Therefore, the defendant is considered legally responsible. This decision also refers to the provisions in Article 112 Paragraph (1) of the same law, as well as the provisions in the Criminal Procedure Code. Criminal liability focuses on perpetrators who violate legal norms. This rule governs how the legal system treats individuals who have violated the applicable provisions. This means that an act that is prohibited by law must be accounted for by the perpetrator, and the punishment imposed is personal. However, a person cannot be sentenced to a criminal conviction if he is innocent or does not meet the elements of criminal responsibility, even though he has committed a criminal act.

The judge has a great responsibility in determining criminal sanctions, because the decision concerns the defendant's basic rights such as life, liberty, dignity, and property, as well as the potential social impact on the defendant's family due to the stigma caused. The Narcotics Law allows for various types of sanctions, ranging from the death penalty, imprisonment, fines, to medical and social rehabilitation measures. In this case, the judge chose to impose a prison sentence and a fine because the sanction system in Article 114 Paragraph (1) Jo. Article 132 Paragraph (1) is cumulative, which requires the application of both at the same time.

Judges' verdicts usually consider a variety of factors, including the social impact of the crime. In order to provide a punishment in accordance with the crime committed by the defendant in Decision No. 28/Pid.Sus/PN Sng in accordance with the level of seriousness of the offense, the convict should be sentenced to 6 years in prison for remembering and following

this case, the author suspects that the defendant is one of the victims of the drug syndicate, the defendant also did this to meet the economic needs of the family.

CONCLUSION

Juridical analysis of the judge's decision in the case of narcotics couriers shows that the role of judges is crucial in upholding justice, especially in distinguishing between the main perpetrators and perpetrators who only act as intermediaries (couriers). In many cases, couriers are at the bottom of the narcotics trafficking network and are often motivated by economic pressure or ignorance of the law.

The judge's decision should proportionately consider the role of the defendant, the existence of coercion or pressure, and the level of involvement in the narcotics network. In addition, judges are also obliged to consider the principles of justice, utility, and legal certainty in making decisions, in accordance with the principles of criminal law and the Narcotics Law. But in practice, it is often found that couriers are sentenced to severe punishment without considering their social and psychological background in depth.

This raises questions about the substantive justice and effectiveness of the criminal justice system in handling narcotics cases as a whole. Therefore, a more progressive and humane legal approach is needed in deciding narcotics courier cases, including the application of the principle of role differentiation, as well as optimizing the role of LPSK and rehabilitation for perpetrators who are not proven to be drug controllers or dealers.

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