

JURIDICAL ANALYSIS OF CRIMINAL LIABILITY FOR POSSESSION OF CLASS I METHAMPHETAMINE NARCOTICS (CASE STUDY AT LANGKAT POLICE)

Sukriadi^{1*}, Syahrul Bakti Harahap²

^{1,2*} Faculty of Law, Universitas Muslim Nusantara (UMN) Al Washliyah, Indonesia,

Email: deasifaunnisya@gmail.com, syahrulbakti@umnaw.ac.id

Abstract

This study analyzes criminal liability for possession and control of Class I non-plant narcotics in a methamphetamine case handled by Langkat Police. The research uses an empirical legal case-study approach with interviews, examination reports, case summaries, statutory materials, and relevant criminal-law literature. The findings show that Article 112 paragraph (1) of Law Number 35 of 2009 is the central provision for conduct involving unlawful possession, storage, control, or provision of Class I non-plant narcotics, while the notions of possession and control require a factual relationship between the suspect and the narcotics. In the case of M. Syafi'i, liability was constructed from the suspect's knowledge of the origin of the methamphetamine, participation in obtaining it with Dicky alias Manut, physical handling, acknowledgment of joint ownership, absence of lawful authorization, and supporting witness and physical evidence. The investigation also referred to Article 114 paragraph (1) as the primary suspicion and Article 112 paragraph (1) as a subsidiary provision

Keywords: criminal liability; possession; control; methamphetamine; narcotics investigation

1. Introduction

Narcotics offenses require precise legal qualification because physical proximity to drugs does not by itself establish criminal possession or control. Investigators must identify a factual relationship between the suspect and the narcotics, including knowledge, ability to exercise control, origin of the drugs, and conduct before and after discovery. This requirement is particularly important when evidence is found near rather than directly on the suspect (Huda, 2014; Hiarij, 2016).

The source case concerns M. Syafi'i and methamphetamine investigated by the Narcotics Investigation Unit of Langkat Police under Police Report Number LP/A/181/VI/2025/SPKT.Sat Res Narkoba/Polres Langkat/Polda Sumatera Utara. The case record describes two clear plastic clips containing suspected methamphetamine, a bong, and two lighters, together with witness statements and the suspect's explanation. The evidence was assessed in relation to the suspect's activities with Dicky alias Manut and their plan to use the drug together.

Article 112 paragraph (1) of Law Number 35 of 2009 criminalizes any person who without right or unlawfully possesses, stores, controls, or provides Class I non-plant narcotics. The formulation is alternative, meaning that proof of one of the listed forms of conduct can satisfy the objective conduct element if the remaining requirements are established. The legal issue therefore turns on the meaning of possession and factual control rather than on formal ownership alone.

The source thesis distinguishes possession from control. Possession emphasizes a relationship of ownership or acknowledgment toward the narcotics, while control emphasizes the factual capacity to hold, use, store, transfer, or otherwise determine what happens to them. This distinction is important because narcotics cases frequently involve shared use, temporary handling, or drugs placed nearby rather than continuously attached to the suspect's body.

The case record states that the suspect knew the origin of the methamphetamine, participated in the series of events by which it was obtained with Dicky, handled the drug, and acknowledged that it belonged to them jointly. These facts are legally more significant than location alone because they show knowledge and a factual relationship with the prohibited substance. The source thesis therefore treats acknowledgment and chronology as central parts of the evidentiary construction.

Criminal responsibility additionally requires that the suspect act without lawful authorization and remain capable of responsibility. The source materials do not identify a medical or legal authorization to possess or control the methamphetamine, nor do they identify a justification or excuse removing fault. The investigation consequently evaluates both the offense elements and personal blameworthiness.

The source case also refers to Article 114 paragraph (1) as a primary suspicion and Article 112 paragraph (1) as a subsidiary provision. This structure requires investigators to distinguish evidence of distribution or intermediary conduct from evidence showing possession, storage, or control. A careful qualification prevents the more serious distribution provision from being applied merely because narcotics are found in circumstances better explained by possession or shared use.

This research addresses the statutory regulation of methamphetamine possession, the criminal responsibility of persons who possess or control narcotics, and the implementation of that responsibility in Langkat Police investigation practice. The analysis is based entirely on the facts and legal materials described in the source thesis. Its focus is the relationship between the suspect, the narcotics, the evidence, and the legal elements used by investigators.

2. Methodology

2.1. Research Methodology

The source study uses empirical legal research with a case-study approach. Primary data consist of interviews with Langkat Police narcotics investigators and official case materials, including the suspect examination report and case summary, while secondary data include Law Number 35 of 2009, criminal-procedure rules, and criminal-law literature. The data are analyzed descriptively and qualitatively to determine how the legal elements are applied in practice.

The analysis follows the stages by which investigators connect community information, surveillance, arrest, seizure, witness statements, suspect statements, and the physical evidence. It does not treat any one stage as conclusive because the significance of the narcotics depends on how the separate facts converge. The method therefore emphasizes evidentiary linkage rather than mere presence at the place of arrest.

The study also compares alternative legal qualifications within the case. Particular attention is paid to whether the facts support possession and control under Article 112 paragraph (1), and how those facts relate to the primary allegation under Article 114 paragraph (1). This approach helps identify the precise form of conduct that the available evidence can support.

2.2. Theoretical Foundations

Criminal liability requires a prohibited act, fault, capacity to be responsible, unlawfulness, and the absence of grounds that remove punishment. In narcotics cases, fault commonly appears through knowledge of the narcotics and conscious participation in possessing, controlling, storing, providing, or distributing them. The source thesis applies this general framework to the factual relationship between M. Syafi'i and the methamphetamine (Saleh, 2017; Chazawi, 2016).

Possession does not always require a formal title or documentary ownership. A person may be treated as possessing narcotics when facts show acknowledgment, shared acquisition,

or another relationship indicating that the substance is regarded as his own. The source case relies on the suspect's acknowledgment of joint ownership as one important fact supporting this element.

Control is broader than continuous physical attachment. It can arise when a person has the factual ability to receive, hold, transfer, use, or determine the disposition of the narcotics, even if the item is temporarily placed nearby. This conception is necessary to analyze cases in which drugs are discarded, hidden, or shared immediately before arrest.

2.3. Legal Arrangements and Key Concepts

Article 112 paragraph (1) of Law Number 35 of 2009 applies to unlawful possession, storage, control, or provision of Class I non-plant narcotics. Because the conduct terms are alternative, investigators are not required to prove every term simultaneously, but they must identify at least one form of conduct that is actually supported by the facts. The element "without right or unlawfully" further requires the absence of lawful authorization.

Article 114 paragraph (1) addresses conduct connected with offering, selling, buying, receiving, acting as an intermediary, exchanging, or delivering narcotics. Its application requires evidence of a distribution or transaction role rather than mere possession. The source thesis therefore stresses the need to distinguish possession for use or joint control from conduct forming part of illicit circulation.

Proof of narcotics identity also requires reliable confirmation that the seized substance is in fact a prohibited narcotic. The source thesis refers to expert or laboratory support as part of the evidentiary construction and does not treat a visual assumption that the substance is methamphetamine as sufficient by itself. This protects the legal analysis from resting on an unverified object.

2.4. Parameters of Juridical Analysis

The first parameter is the factual connection between the suspect and the narcotics, including acquisition, handling, acknowledgment, and ability to control the substance. The second is knowledge and conscious conduct, while the third is the absence of lawful authority. The fourth is the conformity of witness statements, the suspect's statement, and physical evidence.

A separate parameter concerns the location of the evidence. Drugs found near a suspect require additional facts linking the object to that person because proximity alone can create a risk of wrongful attribution. The source case addresses this issue through the suspect's acknowledgment, chronology of acquisition with Dicky, and prior physical handling.

Finally, the analysis distinguishes between possession and distribution. Evidence of communications, money, delivery, sale, or intermediary conduct would strengthen Article 114, whereas facts centered on shared acquisition and use may be more directly connected to Article 112. This distinction is important for proportional and accurate charging.

3. Research Results

3.1. Legal Regulation of Methamphetamine Possession

The research confirms that Article 112 paragraph (1) is the central provision for unlawful possession or control of Class I non-plant narcotics. The terms "possess," "store," "control," and "provide" create alternative forms of prohibited conduct that must be interpreted according to the factual relationship with the narcotics. The existence of a prohibited substance must also be established through legally acceptable examination.

The element of possession in the source case is supported by the suspect's acknowledgment that the methamphetamine belonged jointly to him and Dicky. This acknowledgment is not treated in isolation because it is read together with the account of

obtaining the drug and the suspect's participation in the sequence of events. The combined facts provide a stronger basis than physical proximity alone.

The element of control is supported by the suspect's handling of the methamphetamine and his ability to use it together with Dicky. The source thesis explains that control can exist even when the substance is not continuously attached to the suspect's body. What matters is the factual ability to exercise dominion over the drug.

The source thesis distinguishes ownership from control because narcotics need not be found in a suspect's pocket before a legally relevant relationship with the substance can exist. Ownership emphasizes a relationship of belonging or acknowledgment, while control emphasizes the factual capacity to direct, use, move, or otherwise deal with the narcotics even when they are located nearby rather than attached to the body. In the M. Syafi'i case, this distinction matters because the suspected methamphetamine was found on the ground near the suspect and the analysis therefore depends on statements and surrounding facts showing whether he had previously received, held, or jointly possessed it.

The concept of storage is likewise examined through factual control rather than through the physical location of the substance alone. Where the narcotics are found near the suspect, investigators must relate that location to testimony about who placed the drugs there, who knew of their presence, and who retained the ability to retrieve or use them, because proximity by itself can be ambiguous. The source thesis therefore treats the relationship among the suspect's explanation, the arresting officers' observations, and the condition of the seized objects as the central evidentiary basis for determining possession or control.

3.2. Criminal Liability of the Possessor

The source thesis finds that M. Syafi'i's responsibility can be built from his knowledge of the origin of the methamphetamine, participation in obtaining it, physical handling, and acknowledgment of joint ownership. These facts show a conscious relationship with the prohibited object rather than accidental presence at the arrest location. They also support the conclusion that the conduct was carried out without lawful authority.

The investigation materials did not identify a justification or excuse eliminating responsibility. The suspect was described as physically and mentally able to give an account of the chronology, and there was no indication that he lacked capacity to understand his conduct. This permitted investigators to treat the proven relationship with the narcotics as personally attributable conduct.

Responsibility is not erased merely because the purchase money was attributed to Dicky or because the narcotics were intended for joint use. The source thesis emphasizes that a person can still control or jointly possess narcotics when he knowingly participates in acquisition and handling. The division of financial contribution is therefore relevant context but not necessarily decisive for Article 112.

Criminal responsibility under the source analysis requires more than proof that narcotics existed at the place of arrest. The investigator must connect the substance with an unlawful act, fault, capacity for responsibility, and the absence of a ground excluding punishment, while also determining whether the factual relationship is more appropriately characterized as possession, control, or another narcotics offense. This structure is particularly important where the suspect claims that the substance was intended for personal use or joint consumption, because motive or intended use does not automatically eliminate the unlawfulness of unauthorized possession or control.

The source thesis records that M. Syafi'i stated that the methamphetamine belonged to him together with Dicky alias Manut, which is legally relevant because it supports a relationship of joint interest in the substance. Such an acknowledgment does not end the proof, but it can be read together with the suspect's account of receiving or holding the substance and with the

observations of the arresting officers. The combined facts permit the investigator to assess ownership and control as overlapping but distinct concepts instead of assuming that only the person who paid for the narcotics can be treated as possessing them.

3.3. Implementation in Langkat Police Investigation Practice

The investigation was constructed through a sequence beginning with community information and surveillance, followed by arrest, seizure, witness examinations, and the suspect's statement. The source thesis treats this sequence as layered proof because each step contributes a different type of information about the event. The case file is strongest where these layers are mutually consistent.

Physical evidence included two clear plastic clips containing suspected methamphetamine, a bong, and two lighters, while witness accounts described the arrest circumstances. Investigators then linked these objects with the suspect's explanation concerning the acquisition and intended joint use of the methamphetamine. This connection prevents the evidence from being treated as an object detached from the suspect's conduct.

The investigation applied Article 114 paragraph (1) as the primary allegation and Article 112 paragraph (1) as a subsidiary allegation. The source thesis nevertheless stresses that the exact role must be proven and that distribution-related provisions require evidence beyond mere possession or use. Accurate differentiation is therefore essential to the final legal construction.

AIPTU Tri Wahyudi stated that the arrest involved other officers, including BRIPKA Zulkarnain and BRIPKA Herman, and that two clear plastic clips suspected of containing methamphetamine were found near the suspect along with a bong and two lighters. These objects are relevant not simply because they were present at the scene but because their relationship with the suspect must be explained through witness testimony, seizure documentation, and the suspect's own account. When those sources correspond, the investigation has a stronger factual basis for linking the suspect to the narcotics than would exist from location or proximity alone.

The source analysis also emphasizes the need for laboratory examination and lawful seizure because the criminal characterization depends on the substance actually being narcotics of the alleged type. Physical appearance or an officer's initial suspicion may justify further investigative action, but it cannot substitute for the evidentiary process needed to confirm the object and preserve its integrity. A documented chain from discovery, seizure, packaging, testing, and inclusion in the case file therefore protects both the reliability of the prosecution and the procedural rights of the suspect.

4. Discussion

4.1. Analysis of the Legal Regulation

The alternative wording of Article 112 paragraph (1) gives investigators flexibility but also creates a duty of precision. It is not enough to reproduce all verbs in the provision without explaining which factual conduct is supported by the evidence. The source case is best understood by identifying the specific relationship of possession and control shown by acknowledgment and handling.

The statutory element "without right or unlawfully" performs an important limiting function. It distinguishes prohibited possession from the narrow circumstances in which narcotics may lawfully be handled under authorized medical, scientific, or institutional arrangements. The source record contains no indication that such authorization applied to the suspect.

The relation between Articles 112 and 114 should also be handled carefully. Applying a distribution article requires proof of the conduct specified in that provision, while possession cannot be transformed into distribution by assumption. The source thesis appropriately

recommends closer differentiation among possession, storage, control, use, and intermediary conduct.

Article 112 paragraph (1) is discussed in the source thesis as a provision relevant to unauthorized possession or control of Group I narcotics, and its application must be tied to concrete facts showing the suspect's relationship with the substance. The investigation should therefore describe not only that methamphetamine was found but how the suspect knew of it, how he obtained or handled it, and whether he retained a factual ability to control its use or disposition. This element-based description is more defensible than a formulaic conclusion because it allows each part of the statutory allegation to be traced to a specific item of evidence.

The suspect's claim concerning intended personal or shared use may influence the broader assessment of his role but does not by itself create a right to possess narcotics. The source thesis accordingly separates the reason for having the substance from the question whether the possession or control was lawful, while recognizing that different facts can affect the appropriate legal construction within the narcotics framework. This distinction prevents motive from being confused with an excuse and ensures that the investigator still examines the exact statutory elements supported by the evidence.

4.2. Analysis of Criminal Liability

The strongest aspect of the liability construction is the combination of subjective and objective facts. Knowledge and acknowledgment address the suspect's mental relation to the narcotics, while handling and participation in acquisition address the external conduct. Together they support personal blameworthiness more effectively than location alone.

The case also demonstrates that control may be shared. Joint possession or use does not require each participant to own an equal financial share, because the relevant issue is whether each knowingly exercises factual dominion over the substance. The suspect's account of obtaining and using the methamphetamine together with Dicky is therefore material to the control element.

At the same time, investigators must guard against overreliance on a confession. The source thesis supports corroboration through witnesses, physical evidence, chronology, and objective examination of the narcotics. Such corroboration is especially important when the evidence is found near a suspect rather than on his body.

Capacity for responsibility was also considered in the investigation because the BAP records that M. Syafi'i was physically and mentally healthy and willing to give a truthful statement. That information provides no initial indication that he was incapable of understanding the examination or appreciating the nature of his conduct, although responsibility still depends on proof of the offense and fault rather than on health status alone. The source thesis therefore treats capacity as one component of a larger responsibility analysis instead of as a substitute for proving possession, control, and unlawfulness.

The case illustrates why an investigator should connect the arrest facts, seized narcotics, witness statements, suspect admission, absence of lawful authorization, and the alleged article into a single evidentiary narrative. Each item has limited meaning when isolated, but together they can show a factual and juridical relationship between the suspect and the methamphetamine while also revealing any inconsistencies that require further examination. This integrated approach supports an individualized determination of criminal responsibility and reduces the risk that a person is charged merely because narcotics were found in the same general location.

4.3. Analysis of Investigation Practice

The layered investigation model provides a defensible method for narcotics cases. Community information gives an initial basis, surveillance tests the information, arrest and

seizure secure the scene and objects, and subsequent examinations link the objects to particular persons. No single step should be treated as replacing the others.

The source thesis also highlights the need to develop the case against other involved persons. Dicky alias Manut was described as participating in the acquisition and was not secured in the same way as the investigated suspect, so further development could clarify division of roles and the legal characterization of each person. This is important for avoiding a case that ends only with the person who happens to be arrested.

Finally, the investigation should explain why the chosen provision matches the proven role. If the evidence supports only possession and control for use, Article 112 requires careful construction, while Article 114 must be supported by evidence of transaction or distribution conduct. Transparent element-by-element reasoning strengthens both legal certainty and prosecutorial review.

The source thesis also notes that law enforcement effectiveness depends on legal rules, officers, facilities, community information, and the surrounding legal culture. In the studied case, initial information from the community, the actions of the arrest team, the presence and handling of physical evidence, and later laboratory or documentary verification all contribute to whether possession and control can be proven reliably. This broader perspective shows that substantive criminal responsibility is affected by the quality of the institutions and procedures used to establish the facts supporting it.

Accordingly, the practical application of criminal responsibility at Langkat Resort Police is strongest when the investigator explains the suspect's conduct before arrest, the precise place and condition in which the drugs were found, the relationship among the suspect and other persons mentioned in the case, and the reasons for selecting the charged provision. A careful explanation is especially necessary where joint possession is alleged because the law must identify the individual basis on which each person is said to own or control the narcotics. The resulting case file can then be reviewed by the prosecutor on a transparent factual record rather than on a generalized assumption of collective responsibility.

The source case also demonstrates why joint ownership or joint control must be explained individually rather than treated as a single collective fact. If M. Syafi'i and Dicky alias Manut are both said to have an interest in the methamphetamine, the investigation must identify the acts and statements that connect each person with the substance, including who obtained it, who handled it, who decided where it would be kept, and who intended to use or otherwise exercise control over it. This individualized account is necessary because one person's admission cannot automatically establish another person's criminal responsibility, even when the evidence suggests that the narcotics were regarded as belonging to them together.

The evidentiary significance of the bong and lighters likewise depends on context rather than on the mere presence of those objects near the arrest location. Such implements can support an inference about planned use or the suspect's familiarity with the narcotics when they correspond with admissions, witness observations, and the confirmed substance, but they do not independently prove ownership of a particular package of methamphetamine. The source thesis therefore supports a cumulative method in which every object is assigned a specific evidentiary function and the conclusion of possession or control rests on the convergence of several facts rather than on a single suggestive item.

The location in which the suspected methamphetamine was found must also be described with precision because the difference between direct physical possession and nearby control affects the evidentiary reasoning. When narcotics are found on the ground close to a suspect, the investigator should record distance, accessibility, the suspect's movements, who else was present, whether anyone attempted to discard the object, and whether the suspect's statement explains prior handling, since those details determine whether proximity can reasonably be connected to factual control. The source thesis's emphasis on this reconstruction is important

because a conclusion of control should arise from demonstrated ability and awareness rather than from the simple fact that a person happened to stand near an incriminating object.

The role of the arresting officers' statements should likewise be understood as complementary to, not a substitute for, the suspect's own explanation and the physical evidence. AIPTU Tri Wahyudi's account of the arrest, together with the participation of BRIPKA Zulkarnain and BRIPKA Herman, can establish the circumstances of discovery and seizure, while the suspect's admission concerning joint ownership with Dicky alias Manut helps explain the relationship to the substance; however, the strength of the case depends on how consistently those accounts correspond with the documented location, the seized items, and laboratory confirmation. This multi-source structure supports the thesis's broader position that narcotics responsibility should be based on converging proof of knowledge and control rather than on an isolated statement from either police or suspect.

5. Conclusion

The legal regulation of unlawful possession and control of Class I non-plant narcotics is principally contained in Article 112 paragraph (1) of Law Number 35 of 2009. Possession emphasizes a relationship of ownership or acknowledgment, while control emphasizes factual ability to hold, use, transfer, or otherwise determine the disposition of the narcotics. The alternative wording of the provision means that proof must identify the particular conduct actually established by the evidence.

M. Syafi'i's criminal responsibility is constructed from knowledge of the origin of the methamphetamine, participation in obtaining it with Dicky, physical handling, acknowledgment of joint ownership, lack of authorization, and the absence of an exculpatory ground. The case therefore provides more than mere proximity to the evidence. The factual and subjective relationship with the narcotics is the central basis for responsibility.

Langkat Police applied responsibility through the relationship among community information, surveillance, arrest, seized objects, witness statements, the suspect's explanation, and the statutory elements. The primary use of Article 114 paragraph (1) and subsidiary Article 112 paragraph (1) requires careful differentiation between distribution and possession-related conduct. The principal implication is that charging should reflect the concrete role proven by the evidence rather than the seriousness of narcotics crime in the abstract.

Acknowledgments

The authors express their gratitude to the institution, research informants, and parties who provided access to the legal documents and empirical information used in the source thesis.

References

- (1) Adj, Oemar Seno. *Hukum Acara Pidana dalam Prospekti*. Jakarta: Erlangga, 2015.
- (2) Arief, Barda Nawawi. *Masalah Penegakan Hukum dan Kebijakan Hukum Pidana*. Jakarta: Kencana, 2014.
- (3) Arief, Barda Nawawi. *Teori-Teori dan Kebijakan Pidana*. Bandung: Alumni, 2014.
- (4) Arikunto, Suharsimi. *Prosedur Penelitian Suatu Pendekatan Praktik*. Jakarta: Rineka Cipta, 2006.
- (5) Chazawi, Adami. *Pelajaran Hukum Pidana Bagian I*. Jakarta: RajaGrafindo Persada, 2016.
- (6) Dirdjosisworo, Soedjono. *Narkotika dan Remaja*. Bandung: Alumni, 2014.
- (7) Effendi, Tolib. *Sistem Peradilan Pidana*. Yogyakarta: Pustaka Yustisia, 2014.
- (8) Farid, Andi Zainal Abidin. *Hukum Pidana I*. Jakarta: Sinar Grafika, 2016.
- (9) Hawari, Dadang. *Penyalahgunaan dan Ketergantungan Narkotika*. Jakarta: Balai Penerbit FKUI, 2016.
- (10) Hiariej, Eddy O.S. *Prinsip-Prinsip Hukum Pidana*. Yogyakarta: Cahaya Atma Pustaka, 2016.

- (11) Huda, Chairul. Dari Tiada Pidana Tanpa Kesalahan Menuju Kepada Tiada Pertanggungjawaban Pidana Tanpa Kesalahan. Jakarta: Kencana, 2014.
- (12) Ilyas, Amir. Asas-Asas Hukum Pidana. Yogyakarta: Rangkang Education, 2016.
- (13) Jaya, I Nyoman Serikat Putra. Kapita Selekta Hukum Pidana. Semarang: Badan Penerbit Universitas Diponegoro, 2015.
- (14) Lamintang, P.A.F. Dasar-Dasar Hukum Pidana Indonesia. Bandung: Citra Aditya Bakti, 2018.
- (15) Maramis, Frans. Hukum Pidana Umum dan Tertulis di Indonesia. Jakarta: RajaGrafindo Persada, 2017.
- (16) Marzuki, Peter Mahmud. Penelitian Hukum. Surabaya: Prenada Media Group, 2005.
- (17) Mulyadi, Lilik. Asas-Asas Hukum Pidana. Bandung: Citra Aditya Bakti, 2015.
- (18) Mulyadi, Lilik. Seraut Wajah Putusan Hakim dalam Hukum Acara Pidana. Bandung: Citra Aditya Bakti, 2015.
- (19) Poernomo, Bambang. Asas-Asas Hukum Pidana. Yogyakarta: Ghalia Indonesia, 2015.
- (20) Prasetyo, Teguh. Hukum Pidana. Jakarta: RajaGrafindo Persada, 2017.
- (21) Purwoleksono, Didik Endro. Hukum Pidana. Surabaya: Airlangga University Press, 2016.
- (22) Saleh, Roeslan. Perbuatan Pidana dan Pertanggungjawaban Pidana. Jakarta: Aksara Baru, 2017.
- (23) Sasangka, Hari. Narkotika dan Psikotropika dalam Hukum Pidana. Bandung: Mandar Maju, 2015.
- (24) Soekanto, Soerjono. Faktor-Faktor yang Mempengaruhi Penegakan Hukum. Jakarta: RajaGrafindo Persada, 2014.
- (25) Sugandhi, R. Kitab Undang-Undang Hukum Pidana dan Penjelasannya. Surabaya: Usaha Nasional, 2016.
- (26) Sunarso, Siswanto. Penegakan Hukum dalam Tindak Pidana Narkotika. Jakarta: Rineka Cipta, 2014.
- (27) Sunarso, Siswanto. Politik Hukum dalam Undang-Undang Narkotika. Jakarta: Rineka Cipta, 2012.
- (28) Sunarso, Siswanto. Penegakan Hukum Psikotropika dalam Kajian Sosiologi Hukum. Jakarta: RajaGrafindo Persada, 2014.
- (29) Supramono, Gatot. Hukum Narkoba Indonesia. Jakarta: Djambatan, 2016.
- (30) Tresna, R. Asas-Asas Hukum Pidana. Jakarta: Tiara, 2011.
- (31) Utari, Indah Sri. Kebijakan Kriminal dalam Penanggulangan Penyalahgunaan Narkotika. Semarang: Pustaka Magister, 2013.
- (32) Kitab Undang-Undang Hukum Pidana.