

Proceeding of 2nd Malikussaleh Internasional Conference on Law, Legal Studies and Social Science (MICoLLS) 2022

## Criminal Act Of Experiment Trafficking In Persons (Analysis Of Decision No. 54/Pid. Sus/2021/Pn Lsm)

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#### Abstract

The crime of trafficking in persons is something that has often happened that cannot be denied. So that this matter became a special concern for the Government of Indonesia, which in the end issued the regulation of Law Number 21 of 2007 concerning the Eradication of the Criminal Acts of Trafficking in Persons. The main problem in this research is criminal liability for the attempted criminal act of trafficking in persons and the judge's consideration in sentencing the perpetrators who attempted the criminal act of trafficking in persons in the decision Number 54/Pid.Sus/2021/PN.Lsm. This type of research is included in the normative juridical law research group. Meanwhile, judging from its nature, this research is a complete, detailed, and clear description of a reality. Criminal liability for attempted criminal acts of trafficking in persons in Law Number 21 of 2017 concerning the Eradication of the Crime of Trafficking in Persons is different from liability for attempted criminal acts regulated in the Criminal Code. The difference is that in Article 53 paragraph (2) and paragraph (3) of the Criminal Code the sentence imposed is reduced by one third, while according to Article 10 of Law Number 21 of 2017 concerning the Eradication of the Crime of Trafficking in Persons, the criminal sanctions imposed are not reduced by one third, but are equated with the deed is done. The judge's consideration in imposing a criminal sentence on the attempted criminal act of trafficking in persons in the decision Number 54/Pid.Sus/2021/PN.Lsm is based on evidence, testimony of witnesses, testimony of the defendant and based on the facts revealed in the trial and also consider the aggravating reasons and mitigating reasons from the defendant, and with the judge's conviction, the verdict handed down in this case is a prison sentence of 3 (three) years and a fine of Rp.120,000,000, - so that the judge's consideration in The author considers that the sentence is appropriate because it is appropriate and fulfills these elements. It is recommended that the criminal liability imposed can provide a deterrent effect on the perpetrators. Judges in making decisions are expected to consider everything presented in the trial, in addition to juridical considerations, judges are also expected to carry out non-juridical considerations.

#### Keywords

Criminal Liability, Judge's Consideration, Trial, Trafficking in Persons.

#### DOI: 10.29103/micolls.v2i.90

#### 1. Introduction

Indonesia is a law-abiding country and the state acts in accordance with applicable rules and laws. Law can be viewed as a social tool for creating order and order in people's lives. In this way, the law works through instructions on how to behave and is therefore bound to society as the place where the law applies (ibiius ibi societas).<sup>1</sup>

<sup>&</sup>lt;sup>1</sup>"Republic Indonesian Invite-Invite Basis Year 1945, Article 1, Amendment Iv."

But in that dynamic, crimes against humanity such as human trafficking are not uncommon even on a very large scale. Even Indonesia remains one of these crimes on a large scale. 2021 Trafficking in Persons Based on subsequent report data, Indonesia continues to be the second level of human trafficking. This crime<sup>2</sup> is among the top five crimes in the world whose causes and consequences need to be addressed. Trafficking in persons is part of human rights violations because it is treated very badly and is an attack on human dignity and dignity.<sup>34</sup>

The development of civilization has changed the development of this evil. In the past, human trafficking was only seen as forced transfer abroad for the purposes of prostitution and illegal forced labor. <sup>5</sup> Trafficking in persons is now known in various types or forms, such as debt bondage and the illegal adoption of children between countries. <sup>6</sup> In the Indonesian legal order of trafficking in persons as contained in Article 1 number (1) of Law Number 21 of 2007 concerning the Eradication of Trafficking in Persons, it has the following definitions:

"Trafficking in Persons is the act of recruiting, transporting, sheltering, sending, transferring, or receiving a person with threats of violence, use of force, kidnapping, confinement, forgery, fraud, abuse of power or vulnerable position, debt bondage or providing pay or benefits, so as to obtain the consent of the person in control of such other person, whether committed within the state or between countries, for the purpose of exploitation or resulting in people being exploited. "

Meanwhile, the crime of trafficking in persons is contained in Article 1 number (2) of the Act , namely "any act or series of acts that meet the elements of a criminal act specified in this Act ".  $^7$ 

There are certainly many different factors involved in the development of crime and criminal trafficking activities. But in general, evil can come from a person (*indeterminacy*) or from outside oneself (*determinism*). <sup>8</sup> As well as population movement and poverty, these two factors are even aspects of Aceh so that it does not rule out the possibility of *human trafficking* in Aceh. This is supported by the fact that there was an attempted trafficking in persons (trafficking) incident that occurred at the BLK (Rohingya Immigrant Refugee Camp) Building located in Meunasah me Village, Muara Dua District,

<sup>&</sup>lt;sup>2</sup>"Embassy Big and Consulate U.S. in Indonesia, 2021, *Annual ReportTrading PeopleYear*, <a href="https://id.usembassy.gov/id/our-relationship-id/official-reports-id/laporan-tahunan-perdagangan-orang-2021/">https://id.usembassy.gov/id/our-relationship-id/official-reports-id/laporan-tahunan-perdagangan-orang-2021/</a>, Access on 23 February 2022 hit 3:40 p.m.

<sup>&</sup>lt;sup>3</sup> Mahrus Ali and Wind Aji Pace, *Trade Person: Dimension, Instruments International and Setting in Indonesia*, Bandung, Citra Aditya Filial Piety, 2011, Pp. 1.

<sup>&</sup>lt;sup>4</sup> Nurhenny, H, *Follow Punishment Trade Person Policy Law Punishment and Prevention*, Light Grafika, Jakarta, 2010, Pp. 30.

<sup>&</sup>lt;sup>5</sup> Chairul Badriah, *Rules Trafficking Law (Women and Children)* Bandung Erlangga, 2005 Pp. 2.

<sup>&</sup>lt;sup>6</sup> Deypend Tommy Sibuea, *Op. Cit.* Pp. 232.

 $<sup>^7</sup>$  Article 1 number (2) Law Number 21 Year 2007 Eradication Follow Punishment Trade Person."

<sup>&</sup>lt;sup>8</sup> "Leden Marpaung, *Foundation, Theory, Practice Law Punishment,* Light Grafika, Jakarta, 2005, Pp. 14.

Lhokseumawe City, where 3 (three) young Rohingya women were targeted for trafficking.<sup>9</sup>

The case has been decided by the Lhokseumawe District Court in Decision No. 54/Pid.Sus/2021/PN Ngo which contains the following judgments:

- **1.** "Declaring Defendant Tarmidi Bin Alm. The aforesaid Ibrahim was found lawfully and conclusively guilty of a felony of probation to commit a trafficking offense as in the Second Alternative indictment;
- **2.** Sentence the Defendant therefore to imprisonment for 3 (Three) Years and a fine of Rp.120,000,000.00 (One Hundred and Twenty Million Rupiah) provided that if the fine is not paid, it is replaced by imprisonment for 1 (one) month. "<sup>10</sup>

It was known in the verdict that the defendant was a resident of Blang Village, Tanah Luas District, north Aceh Regency, named Tarmidi Bin Alm. 43-year-old Ibrahim. The suspect was arrested by security officers of the Rohingya refugee BLK Building along with fellow TNI members carrying out arrests of the suspect for illegally carrying out three Rohingya refugees. The indictment leads to criminal acts in Article 10 of Law Number 21 of 2007. Which means that the acts committed by the suspect are the act of assisting or carrying out experiments to carry out criminal acts of trafficking.

In addition, from another perspective, which leads to Articles 53 and 54 of the Criminal Code (KUHP) also Alludes to the suspect's actions. Articles 53 and 54 of the Criminal Code implicitly contain probation on criminal acts.<sup>11</sup> In accordance with the content of the policy of Articles 53 and 54 of the Criminal Code, it appears that "there is a provision that the person who can be convicted is a person who commits an attempted felony, while an attempted offense is not punishable, only that an attempted violation of special criminal provisions can also be punished". In relation to the previous trafficking criminal case, it must have been a question about the relationship of the case to this attempted (*poging*) of the suspect.

In connection with the presentation of the background regarding the problems in this assessment, the author is interested in analyzing the Lhokseumawe District Court Decision Number 54 / Pid.Sus / 2021 / PN the NGO concerns "accountability and dispossession criminal offenses of attempted trafficking".

This type of assessment includes normative assessment, normative legal assessment reviewing legal rules or policies as a system building related to a legal event. This assessment is carried out with the aim of providing a legal perception as the basis for determining whether an event is right or wrong and the perspective of the event is based on the law. <sup>12</sup>

<sup>&</sup>lt;sup>9</sup> Zaki Mubarak and Hendra Gunawan (editor), *Rohingya Young Women Targeted Trade People in Aceh, TP Paid Rp 1 Million 'Kidnap' 3 Girls,* Serambi.com, 2020. https://www.tribunnews.com/regional/2020/10/15/wanita-muda-pengungsi-rohingya-jadi-target trade-people-in-Aceh-one-doer-secured. Access date 23 February 2022 hit 6:14 p.m.

<sup>&</sup>lt;sup>10</sup> Verdict Court Country Lhokseumawe Number 54/Pid.Sus/2021/PN Ngo, Date April 22, 2021.

<sup>&</sup>lt;sup>11</sup> Margaritha V, Alhabsie et al, *Legal Studies About Obey And Do Follow Punishment Murder* (*Delneming*) According to Article 55 and 56 of the Criminal Code, Journal Lex Crimen, 2021, Pp. 19."

<sup>&</sup>lt;sup>12</sup> "Guide Writing Assignment End Faculty University Law Malikussaleh Lhokseumawe, 2015-2016, hln. 108.

The approach used in this assessment is the *statue* approach, the statutory approach including the assessment that prioritizes legal materials that include statutory policies. As material for basic guidelines in carrying out the assessment.

This study has a descriptive nature, this property is intended to provide a perception of the results of the study that has been carried out. The assessment here is carried out by the researcher in order to illustrate or assess whether it is true or false or reasonable based on the law on the reality or legal occurrence of the results assessment. From its form, this study includes descriptive assessment, namely an assessment that is carried out to illustrate or formulate problems according to the existing situation or reality. <sup>13</sup>

#### 2. Discussion

#### A. Criminal Liability for Probationary Trafficking in Persons

Criminal liability is liability for crimes committed by people. Criminal liability arising from a person committing a crime. Criminal liability essentially includes a process created by criminal law to respond to violations of a "treaty to refuse" a specific action.<sup>14</sup>

Criminal liability arises from the continuation of objective prosecution of an act that is subjectively stated against the creator who has been declared a criminal act according to the applicable criminal law and meets the conditions of criminal liability for the act. The basis for the existence of crime is the principle of legality, and the basis of crime is that there is no crime without guilt. That is, the offender is only punished if he makes a mistake.<sup>15</sup>

Criminal liability for probation is contained in Article 53 of the Penal Code paragraphs (2) and (3) which reads: "(a) The maximum principal penalty for the offence in the case of probation is reduced by one-third, (b) If the offence is punishable by death or life imprisonment, it shall be punished with imprisonment for not more than fifteen years".

In criminal acts of attempted trafficking, criminal sanctions as contained in Article 53 paragraphs (2) and (3) of the Criminal Code are not imposed or not used. Criminal sanctions for attempted trafficking are contained in Article 10 of Law Number 21 of 2017 concerning the Enforcement of Trafficking in Persons, namely: "Any person who assists or attempts to commit a trafficking offense shall be punished with the same crime as referred to in Article 2, Article 3, Article 4, Article 5 and Article 6".

With regard to the content of the article , it can be interpreted that "in the provision of criminal sanctions for attempted trafficking, the penalty is not one-third deducted as referred to in Article 53 paragraphs (2) and (3) of the Penal Code". But the criminal sanction is similar to the content of the article imposed or imposed on him.

<sup>&</sup>lt;sup>13</sup> *Ibid* Pp. 109."

<sup>&</sup>lt;sup>14</sup> "Chairul Huda From No Punishment Without Error Towards To No Accountability Punishment Without Error, Gold, Jakarta, 2006, Pp. 70.

<sup>&</sup>lt;sup>15</sup> Dwijda Priyatno, *Policy Legislation About System Accountability Punishment Corporation in Indonesia*, Cv Utomo, Bandung, 2004, Pp. 30."

# B. Comparison of Criminal Liability for Probationary Trafficking in Persons in Indonesian Laws and Regulations

Regarding criminal liability, a very basic component is negligence. A person or group cannot be held accountable if there is no negligence. Trafficking in persons is thus of course a misconduct directed at violations of the provisions of the Criminal Code and Law Number 21 of 2007 concerning the Suppression of Criminal Acts of Trafficking in Persons.

The criminal liability for trafficking suspects under the Criminal Code will be explained:

- a. Individuals whose sole acts achieve criminal acts of trafficking in persons
  - The criminal penalties that can be imposed on this person are "imprisonment for a maximum of twelve years (under Article 324 of the Criminal Code), imprisonment for a maximum of twelve years (article 333 paragraph 1), imprisonment for a maximum of nine years (article 333 paragraph 2), imprisonment for a maximum of twelve years (article 333 paragraph 2), imprisonment for a maximum of six years (article 297), imprisonment for not more than nine years (article 289), imprisonment for not more than one year and four months or a fine of not more than one thousand rupiah (article 296), imprisonment for a maximum of one year (article 506)".
- b. Individuals called mede daders, many of whom are involved in the realization of criminal acts of trafficking, who do (pleger), who order to do (doen pleger), who participate in doing include four types of human beings (*mede pleger*), people who advocate that the person (*uitloker*) act responsibly as a sole maker. The criminal penalties that can be imposed on this person are "imprisonment for a maximum of twelve years (based on article 324 of the Criminal Code), imprisonment for a maximum of eight years (Article 333 paragraph 1), imprisonment for a maximum of nine years (Article 333 paragraph 2), imprisonment for a maximum of twelve years (Article 333 paragraph 2), imprisonment for a maximum of six years (Article 297), imprisonment for a maximum of nine year and four months or a maximum fine of one thousand rupiah (article 296), imprisonment for a maximum of one year (Article 506)".
- c. Individuals who are dubbed as auxiliary makers (*medeplichtige*), can help when criminality is committed or before criminality is committed. The criminal penalty that can be imposed on this person is "the maximum principal penalty for the crime can be reduced by one-third (under Article 57 paragraph 1). So the penalty as already mentioned in Articles 324, 333 paragraph 1, paragraph 2, and paragraphs 3, 297, 289, 296, and 506 is reduced by a third".

Meanwhile, the responsibility for probationary criminal acts in Law Number 21 of 2007 concerning the Eradication of Criminal Acts of Trafficking in Persons is contained in Article 10 which reads:

"Any person who assists or attempts to commit a trafficking offense shall be punished with the same crime as referred to in Article 2, Article 3, Article 4, Article 5, and Article 6."

For the purposes of the content of the above article, we can see that those who attempt to commit trafficking crimes bear the same responsibility as one crime. Minimum imprisonment of 3 years, maximum of 15 years, minimum fine of 120 million rupiah and maximum of 600 million rupiah for those who commit one crime.

With regard to the above information regarding criminal liability for probationary trafficking crimes, there is a comparison or comparison of probationary criminal liability in the Criminal Code and Law Number 21 of 2007 concerning the Suppression of Criminal Acts of Trafficking in Persons.

Where Article 53 of the Penal Code explains that "in the case of probation, the maximum principal penalty for the crime is reduced by one-third, and for thosewho commit the crime shall be punished with death or life imprisonment, a maximum of fifteen years' imprisonment shall be imposed". Meanwhile, Article 10 of Law Number 21 of 2007 concerning the Eradication of Trafficking in Persons explains that " Any person who assists or attempts to commit a trafficking offense shall be punished with the same crime as referred to in Article 2, Article 3, Article 4, Article 5, and Article 6". Here in the case of criminal probation, the criminal liability is equated with the individual who commits the crime singularly. Thus, with the existence of Law Number 21 of 2007 concerning the Eradication of Criminal Acts of Trafficking in Persons, so that the provisions of Article 53 of the Criminal Code no longer apply.

Comparison of Article 53 of the Criminal Code with Article 10 of Law Number 21 concerning the Eradication of Trafficking in Persons compared to penalties for those who commit probationary crimes or accountability to those who commit probationary crimes. Law Number 21 of 2007 concerning the Elimination of Criminal Acts of Trafficking in Persons applies, which is based on the principle of legal translation based on special laws, and it is a legal interpretation to form a special law, because it is a principle (lex specialis) overriding the general law (*lex generalis*).

### C. Basis for Judges' Consideration in Sentencing Criminals of Probationary Trafficking in Persons in Judgment No. 54/Pis.Sus/2021/PN.Ngo

Judges include a form of law and justice in a quasi-manner, the status of judges has been contained in the state constitution in the third amendment to the 1945 Constitution, Article 24 Paragraph (1) explained that "judicial power is an independent power to administer justice to uphold law and justice." . <sup>16</sup> When handling all criminal cases handled, initially through the main hearing, the judge cannot withdraw the decision on the criminal proceedings he is facing. Because it is only this mechanism that we can get real events from the defendant. This court process provides an equal opportunity for all parties, both prosecutors and defendants/lawyers, to express views and assess the outcome of the trial from their respective points of view. This judicial mechanism includes a formal area of law that must be implemented by a judge in order to withdraw decisions in a criminal case.

The crime of trafficking in persons can be committed by all parts of a person, and a person who can be charged as the subject of the law of a criminal act and held

<sup>&</sup>lt;sup>16</sup> "Al Vishnu Broto, *Law and Judicial in Indonesia deep Some Aspects Study* University Atma victory Yogyakarta: Yogyakarta, 1997, Pp. 37."

accountable for an act committed is physically and spiritually ill, can be in good health. responsible for all actions he commits. Second, any component that recruits, transports, detains, transfers or receives persons under the pressure of violence, fraud or vulnerable status for the purpose of exploiting persons within the territory of the Unitary State of the Republic of Indonesia.

In the examination of this case, the trafficking case requires careful consideration of the evidence, etc., and due to its complex and complicated nature, the trial is conducted in the Lhokseumawe District Court in accordance with the normal checking procedure. The law is not straightforward, so we can't use *rapid* test or *short test* programs.

Before sentencing the suspect, the Court considers the circumstances involving the suspect and his actions, namely:

- 1) Mitigating situation:
  - a) The defendant was sorry for his actions and agreed not to repeat them again;
  - b) The defendant was honest to the point of facilitating the trial mechanism;
  - c) The defendant has family dependents to support;
  - d) The defendant has never been convicted.
- 2) Aggravating situations:
  - a. The suspect's actions did not support the government's activities in dealing with trafficking crimes.

After considering the aforementioned considerations and finally the Panel of Judges of the Lhokseumawe District Court who examined the case handed down the verdict against the suspect, namely:

- 1. "Declaring Defendant Tarmidi Bin Alm. Ibrahim was lawfully and conclusively convicted of the crime of "attempted trafficking" as in the second indictment;
- 2. Sentence the Defendant therefore to imprisonment for 3 (three) years and a fine of Rp. 120,000,000.00 (One Hundred and Twenty Million Rupiah) provided that if the fine is not paid, it is replaced by imprisonment for 1 (one) month;
- 3. Establishes the period of arrest and the period of detention for which the Defendant has served is deducted entirely from the sentence imposed;
- 4. Establish the Defendant remains in custody;
- 5. Establish evidence in the form of:
  - a) 1 (one) Machine Rickshaw Unit along with a photocopy of STNK and Key; Returned to witness Faisal Bin Alm. Abdul Rahim;
  - b) 1 (one) Unit of Daihatsu Brand Type Car in Black Metallic Year 2009 BL 1340 KZ;
  - c) Key and STNK 1 (one) Unit Car type Daihatsu Brand in Black Metallic Year 2009 BL 1340 KZ an. Tarmizi; Returned to Defendant;
  - d) 1 (one) piece of Oppo Brand Mobile blue color. Destroyed.
  - e) Charge the Defendant to pay a case fee of Rp. 5,000 (Five Thousand Rupiah)."

# D. Analysis of the Lhokseumawe District Court Judge's Decision on the Crime of Probationary Trafficking in Case No. 54/Pid.Sus/2021/PN. Ngo

The law already emphasizes that judges as executors of law and justice are obliged to uncover, follow, and understand the legal values that live in society. <sup>17</sup>

Human trafficking includes criminality and gross violations of human rights. The incidence of human trafficking over time is increasing. Human trafficking is the criminality of humanity, tragic events of humanity itself, and trafficking victims are usually women and children. They are a vulnerable group and often easily targeted by traders.

Based on the author's analysis, the implementation of women's trafficking crimes based on Law Number 21 of 2007 concerning the Eradication of Trafficking in Persons in the Lhokseumawe District Court took place appropriately. The accuracy of Law Number 21 of 2007 can be seen from the resolution of cases carried out by the Lhokseumawe District Court to end trafficking cases throughout the year.

In connection with the analysis of the author of the judge in examining and adjudicating the criminal case of attempted trafficking (Rohingya women) who appeared in Lhokseumawe, it has been tried fairly in the judge's decision with Case Number 54/Pid.Sus/PN.Ngo in the Lhokseumawe District Court. In accordance with the actions committed by the tersnagka are grouped into the act of assisting or carrying out criminal acts of attempted trafficking until they are subject to Article 10 of Law Number 21 of 2007 concerning the Eradication of Acts The Trafficking in Persons Penalty, which by statute can be sentenced to criminal sanctions similar to Article 2, Article 3, Article 4, Article 5, and Article 6, namely "can be sentenced to a minimum of 3 (three) years in prison and a maximum of 15 (fifteen) years and a fine of at least Rp.120,000,000 (one hundred and twenty million rupiah) and a maximum of Rp.600,000,000 (six hundred million rupiah) ". Thus, in accordance with the judge's consideration and the evidence submitted by the public prosecutor who proved that the suspect actually tried to carry out the criminal act of trafficking, he was sentenced to three years in prison and a fine of Rp 120 million. If it is unable to pay off the fine, it can be replaced by confinement for one month.

In connection with the results of the review of this thesis on "Analysis of Judgment No. 54/Pid.Sus/2021/PN.Ngos Related to the Crime of Attempted Trafficking in Persons" it can be concluded thatsanya sistem criminal liability for criminal acts of attempted trafficking in persons on Law Number 21 of 2007 concerning the Eradication of Criminal Acts of Trafficking in Persons is different from the responsibility for probationary criminal acts contained in the Criminal Code. What makes it different is that "Article 53 paragraph (2) and paragraph (3) of the Criminal Code the sentence imposed is reduced by one-third while according to Article 10 of Law Number 21 of 200 7 concerning the Eradication of Trafficking in Persons the criminal sanctions imposed are not reduced by one-third, but equated with completed acts".

The judge's consideration of the criminal conviction for the criminal act of attempted trafficking in persons in judgment No. 54/Pid.Sus/2021/PN.NGO, namely

<sup>&</sup>lt;sup>17</sup> "Bagir Manan, *Authority Justice Republic Indonesian* LPPM-UNISBA: Bandung, 1995, Pp. 12."

based on evidence, statements of witnesses, statements of suspects and accordingly the facts revealed at trial and also considered the aggravating causes and mitigating causes of the suspect, and with the conviction of the Judge so that the verdict imposed in this case is a prison sentence of 3 (three) years and a fine of Rp.120,000,000, - until the judge's consideration when sentencing the criminal is considered by the author to have effective because it has aligned and achieved those components.

### 3. Reference

- Al Vishnu Broto. 1997. *Law and Judicial in Indonesia deep Some Aspects Study* University Atma victory Yogyakarta: Yogyakarta. Pp. 37.
- Article 1 number (2) Law Number 21 Year 2007 Eradication Follow Punishment Trade Person.
- Bagir Manan. 1995. *Authority Justice Republic Indonesian* LPPM-UNISBA: Bandung. Pp. 12.
- Chairul Badriah. 2005. *Rules Trafficking Law (Women and Children)* Bandung Erlangga. Pp. 2.
- Chairul Huda. 2006. From No Punishment Without Error Towards To No Accountability Punishment Without Error. Gold, Jakarta. Pp. 70.
- Dwijda Priyatno. 2004. Policy Legislation About System Accountability Punishment Corporation in Indonesia, Cv Utomo. Bandung. Pp. 30.
- Embassy Big and Consulate U.S. in Indonesia, 2021, *Annual ReportTrading PeopleYear*, <<u>https://id.usembassy.gov/id/our-relationship-id/official-reports-id/laporan-tahunan-perdagangan-orang-2021/</u>></u>, Access on 23 February 2022 hit 3:40 p.m.
- *Guide Writing Assignment End.* 2015-2016. Faculty University Law Malikussaleh Lhokseumawe. hlm. 108.
- Leden Marpaung. 2005. *Foundation, Theory, Practice Law Punishment.* Light Grafika. Jakarta. Pp. 14.
- Mahrus Ali and Wind Aji Pace. 2011. *Trade Person: Dimension, Instruments International* And Setting In Indonesia, Bandung, Citra Aditya Filial Piety. Pp. 1.
- Margaritha V, Alhabsie et al, 2021. *Legal Studies About Obey And Do Follow Punishment Murder (Delneming) According to Article 55 and 56 of the Criminal Code*, Journal Lex Crimen. Pp. 19.
- Nurhenny, H. 2010. Follow Punishment Trade Person Policy Law Punishment and Prevention, Light Grafika. Jakarta. Pp. 30.
- Republic Indonesian Invite-Invite Basis Year 1945, Article 1, Amendment Iv.
- Verdict Court Country Lhokseumawe Number 54/Pid.Sus/2021/PN Ngo, Date April 22, 2021.
- Zaki Mubarak and Hendra Gunawan (editor), Rohingya Young Women Targeted Trade People in Aceh, TP Paid Rp 1 Million 'Kidnap' 3 Girls, Serambi.com, 2020. https://www.tribunnews.com/regional/2020/10/15/wanita-muda-pengungsirohingya-jadi-target trade-people-in-Aceh-one-doer-secured. Access date 23 February 2022 hit 6:14 p.m.