

Analysis of a Court Ruling on Criminal Sanctions for a Minor Perpetrator of Rape (Study of Court Ruling No. 70/Pid. Sus-Anak/2024/PN Medan)

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Article History

Submission : 04-03-2026
Received : 31-03-2026
Revised : 04-04-2026
Accepted : 27-04-2026

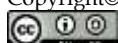
Abstract

This study discusses legal considerations regarding criminal sanctions and work training for children as perpetrators of sexual intercourse crimes, focusing on Medan District Court Decision Number 70/pid.sus Anak/2024/PN Medan as the source case. This is done to ensure that children in conflict with the law continue to receive supportive care for future guidance and rehabilitation. Conversely, children can also be criminalized. Therefore, the issues discussed include the legal basis governing the criminal responsibility of children towards children and the considerations taken by judges when they make decisions after being found guilty by a judge in accordance with Article 81 Paragraph (2) Article 76d of the Child Criminal Justice System Law (SPPA Law). This study uses a normative juridical method with a case study approach, examining materials from secondary and tertiary law, literature reviews, and descriptive analysis. This study also focuses on providing recovery to victims to achieve a more balanced justice in the Juvenile Criminal Justice System in Indonesia. The results of the study show that the judge's considerations include legal aspects such as (UU SPPA). However, the considerations in the verdict are inaccurate because they do not pay enough attention to the future of the victims.

Keywords: Criminal Sanctions, Children, Judgment Studies, Job Training, Sexual Intercourse

Abstrak

Studi ini membahas pertimbangan hukum mengenai sanksi pidana dan pelatihan kerja bagi anak sebagai pelaku kejahatan hubungan seksual, dengan fokus pada Putusan Pengadilan Negeri Medan Nomor 70/pid.sus Anak/2024/PN Medan sebagai kasus sumber. Hal ini dilakukan untuk memastikan bahwa anak yang berkonflik dengan hukum terus menerima perawatan pendukung untuk bimbingan dan rehabilitasi di masa depan. Sebaliknya, anak juga dapat dikriminalisasi. Oleh karena itu, isu yang dibahas meliputi dasar hukum yang mengatur tanggung jawab pidana anak terhadap anak dan pertimbangan yang diambil oleh hakim ketika mereka mengambil keputusan setelah dinyatakan bersalah oleh hakim sesuai dengan Pasal 81 Ayat (2) Pasal 76d Undang-Undang Sistem Peradilan Pidana Anak (UU SPPA). Studi ini menggunakan metode yuridis normatif dengan pendekatan studi kasus, meneliti materi dari hukum sekunder dan tersier, tinjauan pustaka, dan analisis deskriptif. Studi ini juga berfokus pada pemberian pemulihan kepada korban untuk mencapai keadilan yang lebih seimbang dalam Sistem Peradilan Pidana Anak di Indonesia. Hasil penelitian menunjukkan bahwa pertimbangan hakim meliputi aspek hukum seperti (UU SPPA).



Namun, pertimbangan dalam putusan tersebut tidak akurat karena tidak cukup memperhatikan masa depan para korban.

Kata kunci: Anak-anak, Hubungan Seksual, Pelatihan Kerja, Sanksi Pidana, Studi Putusan

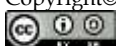
Introduction

Legal protection for children in conflict with the law is a crucial aspect of the juvenile criminal justice system, given the potential negative psychological and social impacts children may face, which can affect their future. According to data from the National Commission for Child Protection (Komnas PA), in 2023 there were 3,547 cases of violence against children. Of these, 3,000 involved sexual violence against children. This is undoubtedly a serious issue that threatens the lives of children. Legal protection measures must be implemented to ensure children's well-being through various means, such as guaranteeing the fulfillment of children's rights without discrimination (M. Nasir Djamil, 2013). Criminal cases involving a child – whether as a perpetrator or a victim – are sensitive issues requiring a legal approach marked by utmost caution. One important aspect that needs to be examined is how the criminal justice system holds children involved in crimes accountable, particularly in cases of sexual offenses, such as when a child persuades another child to engage in sexual intercourse (Simanjuntak, Sidi, & Ismaidar 2025).

Vocational training is expected to provide children with useful skills, enabling them to make a positive contribution to society after completing their sentences. However, the implementation of this sanction often faces various obstacles, both legal and social. Therefore, it is important to analyze how vocational training is implemented in practice and its impact on children. This is highly relevant (Siboro 2024) given the large number of children involved in the criminal justice system (Hidayati 2019); by understanding this context, we can evaluate the effectiveness of vocational training sanctions in the rehabilitation of juvenile offenders. Deviant behavior committed by adolescents, referred to as juvenile delinquency in foreign languages, is an act or action committed by a minor who intentionally violates the law, knowing that such an act may result in sanctions or imprisonment (Adha, Armanda, & Muhammad 2025).

Judgment No. 70/pid.sus-Anak/2024/PN.Medan serves as a case study in which a child acted as the perpetrator, persuading another child to engage in sexual activity under the pretext of assuming legal responsibility; justice is a fundamental principle for both victims and perpetrators. Many argue that the law must align with justice to truly hold meaning. In the context of this incident, children occupy a unique position; they are a trust and a gift from God that must be protected. Therefore, it is essential to ensure that all children receive optimal services and protection from the judicial system and legal processes. Psychologically, children have mental states that are still unstable and unbalanced, and they often do not understand the causes and consequences of their actions. Behavioral deviations committed by adolescents, in the sense of juvenile delinquency commonly referred to in English as Juvenile Delinquency (A.ndruru 2022) is an act or action committed by a minor who intentionally violates the law, based on the child's own understanding that such an act is subject to sanctions or imprisonment (Siboro S.N., 2024).

The goal is to ensure that the principles, rules, and rights of children apply to all children, whether they are in contact with the law or in conflict with the law. Furthermore, the goal of access to justice for children is to ensure that children receive assistance in judicial proceedings, whether criminal or civil. In dealing with children in conflict with the law, every country must adhere to the standards established by international law. International law sets forth requirements for states to provide legal protection and respect for children in conflict



with the law through the development of laws, procedures, authorities, and institutional frameworks (Inter-Parliamentary Union & UNICEF, 2006).

In recent decades, attention to children's rights within the criminal justice system has grown significantly, both at the national and international levels. This awareness has led to the enactment of regulations aimed at shifting the approach to juvenile criminal justice from a punitive model toward a more rehabilitative one. Law No. 11 of 2012 on the Juvenile Criminal Justice System (abbreviated as the Juvenile Criminal Justice Law). According to Friska, children are the cornerstone of a nation's future (Khairunnisa & Rasji 2024); therefore, they must be protected by various legal rules and policies that guarantee their rights and well-being. Diversion must be pursued with the aim of achieving reconciliation between the victim and the child and resolving the child's case outside the court process (Widodo 2016). If diversion is agreed upon by the parties, particularly the victim at the investigative stage (police station), the victim will regain their rights. On the other hand, if diversion is unsuccessful, the process will proceed to the prosecution stage (the District Attorney's Office), and if it remains unsuccessful, it will proceed to court (Fikri, Siregar, Rafianti, and Mawarni 2022). The primary principle of diversion is to maintain a balance between justice and an understanding of the child's development. This means that children who commit criminal offenses remain accountable for their actions, but the court system must prioritize a more caring and educational approach over harsh punishment (Hasibuan, Laia, and Novila 2025).

According to Law No. 11 of 2012 on the Juvenile Criminal Justice System (SPPA), children under the age of 18 cannot be punished like adults. Instead, they are directed toward vocational training programs or guidance and protection of their rights. However, in certain cases, children may be held criminally liable, although with an approach that focuses more on rehabilitation than on mere criminal punishment.

The author is interested in researching and examining issues related to sentencing for the crime of sexual intercourse committed by a child during the judicial process. This is based on Court Decision No. 70/Pid-Sus/Anak/2024/PN.Mdn, in which the party involved in this case is Adrian Maulana, also known as Rian, as the perpetrator. In conflict resolution through litigation, the winning party suffers losses, and even court decisions that have been finalized cannot be enforced because they do not align with public justice. This ruling serves as a crucial foundation for understanding how the legal system imposes criminal sanctions, specifically work-training programs, on children who commit sexual intercourse.

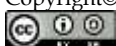
Methods Research

This study employs a normative legal methodology, which is a type of legal research focused on the analysis of legislation, legal principles, and applicable court decisions. Normative research encompasses legal principles, legal systematics, comparative law, an inventory of positive law, and the philosophical foundations (dogmas or doctrines) of positive law (Azward Racmat Hambali, 2020). The approaches used include the statutory approach, library research, and the conceptual approach to analyze the ruling on criminal sanctions for child labor as perpetrators of sexual intercourse in case number 70/pid - sus/anak/PN Medan based on Law No. 11 of 2012 on the Protection of Children from Sexual Exploitation.

Results and Discussion

How does the law address criminal penalties for child labor

As the legal basis, Law No. 11 of 2012 on the Juvenile Criminal Justice System (the Juvenile Criminal Justice Law) governs the authority of judges to impose penalties involving



work training on children, as stipulated in Article 71(1)(c), which lists work training as one of the principal penalties alongside a warning, a suspended sentence, institutional rehabilitation, and imprisonment. Under Article 71(3), work training may be used as an alternative to a fine if the criminal procedure law provides for both imprisonment and a fine simultaneously, with a duration of at least three months and up to one year in accordance with Article 78(2). This sanction is imposed by the judge based on a report from the social welfare officer (Bapas). The judge considers the child’s talents, interests, and the principle of child protection for rehabilitation and self-reliance.

Table 1. Legal Provisions Regarding Minors as Perpetrators of Sexual Assault

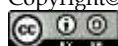
Section	Provision	Criminal Penalty
76 D	Violence or threats of sexual intercourse with a child	5-15 year +Rp.5.000.000.000
76 E	Violence or indecent acts	5-15 year + Rp.5000.000.000
81 (1)	Sexual intercourse with a child	5-15 year +Rp.5000.000.000
81(2)	Deception, lies, or enticement to sexual intercourse	5-15 year +Rp.5000.000.000
81(3)	Aggravated penalty (1/3) if the perpetrator is a parent, guardian, or educator	Plus one-third of the sentence
82	Indecent acts	5-15 year +Rp.5000.000.000
71D	Restitution for the child victim	Ganti kerugian ,materil/imateril

The legal system consists of all binding norms that govern the rights, obligations, and legal consequences of legal subjects. It is specified that individuals who are over 18 (eighteen) years of age but have not yet reached 21 (twenty-one) years of age are still subject to juvenile court proceedings. For children as perpetrators of criminal acts, the law establishes age limits and holds them accountable through investigative, prosecutorial, and judicial procedures. Children’s rights within the legal process, as well as the criminal sanctions and measures that may be imposed in accordance with the Law on the Juvenile Criminal Justice System (SPPA), demonstrate that the entire Juvenile Justice System is designed based on the principles of protection and rehabilitation, not retribution. As explained in Article 2, which outlines the principles related to protection, justice, and the best interests of the child. Similarly, Articles 3, 4, 5, and 6 of the SPPA Law state: “Every child in conflict with the law must be guaranteed human rights, a fair trial, legal assistance, and protection from torture.” Article 5, Paragraph (1), “emphasizes that the Criminal Justice System is obligated to implement the Restorative Justice process,” and Paragraph (3) states that within the Juvenile Justice System, as referred to in Paragraph (1), letters (a) and (b), Diversion must be pursued.

Articles 6 through 15 govern the implementation of diversion and the procedures for carrying it out. As stipulated in Article 29(4), in the event that diversion fails, the investigator is required to continue the investigation and refer the case to the public prosecutor, attaching the diversion record and the community assessment report.

Article 71 explains criminal penalties within the Juvenile Criminal Justice System, namely:

- (1) The principal penalties for minors consist of:
 - a. a warning
 - b. a conditional sentence
 - c. work training
 - d. supervised placement in an institution



e. imprisonment

(2) Additional penalties consist of: a. the forfeiture of proceeds derived from criminal acts; or the fulfillment of obligations

The imposition of punishment or measures must be considered and beneficial to the child. Every punishment or measure is intended to prevent victimization, suffering, and physical, mental, or social harm. To avoid undesirable and harmful outcomes, punishment must be based on justice as the sole ethical foundation. Every punitive measure is evaluated based on the principles of justice and harmony it seeks to achieve, as harmony reflects justice. Punishment is a measure applied to a delinquent child who can be held accountable for their actions, and the child's reflection on what they have done helps them feel better. (Gultom, 2008).

Article 81 of the Child Protection Act stipulates that sexual intercourse with a child is a serious crime, particularly if committed through violence, threats, deception, or enticement. Article 81 remains applicable to determine that the perpetrator's actions constitute a criminal offense, but the method of imposing sanctions is aligned with the Child Criminal Justice System Act. This means that the child perpetrator is not imprisoned like an adult but is subject to special criminal measures for children, such as rehabilitation or placement in a Child Correctional Institution (LPKA), and the legal process must prioritize measures to ensure the child can still be rehabilitated.

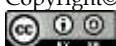
Meanwhile, the Criminal Code (KUHP) stipulates that a person may be held accountable for their actions based on their own awareness and understanding that such actions are prohibited under applicable law. In the case of sexual abuse committed by a child, pursuant to Article 82(1) of the Child Protection Act (UU SPPA), there is no basis for exempting the child from criminal liability if the child is capable of bearing responsibility (physically and mentally sound). The forms of sanctions imposed on a child under Article 82(1) of Law No. 11 of 2012 on the Juvenile Criminal Justice System include:

- a. Return to parents/guardians.
- b. Placement with a designated individual
- c. Care in a psychiatric hospital
- d. Care at a Social Rehabilitation Center (LPKS)
- e. Requirement to participate in formal education and/or training programs organized by the government or private entities. Revocation of a driver's license and/or
- f. Rehabilitation following a criminal offense (Sonia Jasmine 2016)

The Juvenile Criminal Justice System Act (UU SPPA) seeks to implement restorative justice through diversion. By applying restorative justice, it is expected that these figures can be reduced, thereby lowering state operational costs and preventing criminogenic effects resulting from free association within correctional facilities (Hasibuan, Brahmana & Herqutanto, 2025). This constitutes an effort to fulfill and protect children's rights in Indonesia as stipulated in the 1945 Constitution, the Convention on the Rights of the Child, the Human Rights Act, and the Child Protection Act.

With regard to criminal liability for minors, following the repeal of Articles 45, 46, and 47 of the Criminal Code (KUHP), the KUHP still does not clearly regulate the age of criminal responsibility for children. By way of comparison, Articles 45, 46, and 47 of the KUHP previously stipulated that minors who committed criminal acts were to be treated as follows:

- a. If the criminal act was committed by a child aged 9 to 13 years, the judge was advised to return the child to their parents or guardians without imposing a criminal sentence.
- b. If the criminal act was committed by a child aged 13 to 15 years and constituted a minor offense as regulated in Articles 489, 490, 492, 496, 497, 503, 505, 514, 517, 519, 526, 531, 532, 536,



and 540 of the KUHP, the judge could order that the offender be handed over to the government or a private legal entity to be educated until the age of 18.

In cases of sexual intercourse offenses committed by children in violation of Article 76E of the Juvenile Criminal Justice System Act, diversion cannot be pursued. This is because violations of Article 76 of the UU SPPA are punishable by a maximum term of imprisonment of 15 (fifteen) years and a maximum fine of IDR 5,000,000,000 (five billion rupiah), as stipulated in Article 82 paragraph (1) of the Juvenile Criminal Justice System Act.

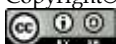
In my view, the sanction of job training should be regarded as one of the principal penalties, in accordance with retributive theory. On this basis, it may be imposed together with the main criminal sanction. Meanwhile, with regard to children in conflict with the law, Indonesian law uses the term “child” to refer to persons who are not yet mature, underage individuals, and children under guardianship. In terms of age, several regulations govern this matter. These legal provisions stipulate different age thresholds, and their application is subject to the principle of legal preference, whereby more specific rules prevail over general ones.

Therefore, in cases of sexual intercourse offenses committed by children, judges cannot issue decisions in the form of diversion, but must instead impose action-based sanctions in accordance with Article 82 paragraph (1) of Law Number 11 of 2012 on the Juvenile Criminal Justice System (Sudarto, 1981).

Analysis of the Decision on the Sanction of Work Training as a Criminal Penalty for Child Offenders in Sexual Intercourse Cases (Case Study of Decision Number 70/Pid.sus-Anak/2024/PN-Medan)

This case involves a 15-year-old perpetrator, who was found legally and convincingly guilty of the criminal act of sexual intercourse—specifically, “intentionally persuading a minor to engage in sexual intercourse with him”—against the victim, his 13-year-old girlfriend. Previously, Adrian Maulana, also known as AM, and his girlfriend had been in a relationship since November 26, 2024. The first incident occurred on Thursday, November 28, 2024, around 9:00 AM, when the perpetrator sent a message to the victim asking, “Where are you, Kei?” After that, the victim replied that she was at home. Shortly thereafter, Adrian, alias AM, arrived at the victim’s home on Jl. Rahmadsyah No. 12, Kota Matsum Village, Medan Area District. The victim invited the suspect into the bedroom; AM and the victim then entered the room, where the witness, Razzan Yazzahara, alias Zahra, was asleep.

Next, the perpetrator grabbed the victim’s hand, pushed him onto the bed, pinned him down, and kissed the victim’s lips and neck. The perpetrator then removed the victim’s shirt and pants until they were completely off. Then the perpetrator said, “Take off your pants,” but the victim replied, “I don’t want to; I still want to play.” However, the perpetrator began to coax the victim, claiming he wanted to take responsibility for his words. The victim was lulled into a false sense of security and trusted the perpetrator’s words. The perpetrator then began to remove the victim’s pants and engaged in sexual intercourse with the victim. Suddenly, the younger sibling, “RZ,” woke up and said, “Big brother, I need to pee,” then the victim’s child said, “Just close your eyes first,” and Rz closed his eyes and left the room. Next, AM inserted his erect penis into the victim’s vagina. After finishing, the victim noticed a bloodstain on her vagina. Once finished, AM immediately put his pants and clothes back on, then the child went home. However, around 5:30 PM, the victim’s mother returned home, and AZ said, “Mom, my older sister’s boyfriend came into the room earlier,” and “then they were kissing and taking off their pants.” The victim’s mother immediately asked the victim



about it, and the victim told the truth. Feeling outraged, the victim's mother immediately filed a report with the Medan City Police Headquarters.

That based on the medical report No. 440/10184/2024 dated November 30, 2024, signed by Dr. Riza Hendrawan Nst. SpoG, a government doctor with the Medan City Health Department at Dr. Pringadi Regional General Hospital, reached the following conclusion after examining Keisha, alias the victim: Genitalia: Tears were observed in the hymen at the 11, 8, 7, and 3 o'clock positions extending to the base. (The hymen was not intact.) The act committed against the child, as regulated and punishable under Article 81(2) in conjunction with Article 76d of Law of the Republic of Indonesia No. 23 of 2014 amending Law No. 23 of 2002 on Child Protection, has been fulfilled; therefore the charges are legally proven and convincing as stated in the indictment; during the trial, the judge found no grounds to negate criminal liability, whether as justification or mitigation.

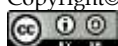
Article 79(2) of Law No. 11 of 2012 on the Juvenile Criminal Justice System (SPPA Law) also stipulates that non-custodial sentences imposed on children cannot be separated from the custodial sentences that may be imposed on adults. The purpose of this is to impose lighter sentences on children by focusing on social reintegration and rehabilitation, which are the core principles in child development. Furthermore, the provisions setting the minimum prison sentence do not apply to children, as stated in Article 79(3), which allows judges to impose stricter penalties than those applicable to adults. Imprisonment also does not apply to children, as stated in Article 79, Paragraph (3), which allows judges to impose harsher penalties than those applicable to adults.

A judge may not impose cumulative sentences on a defendant; that is, a principal sentence and an additional penalty may not be imposed simultaneously. However, in cases involving delinquent children, a principal sentence and an additional penalty may be imposed (Ibid., p. 125). As stipulated in Article 71(3) of Law of the Republic of Indonesia No. 11 of 2012 on the Juvenile Criminal Justice System (SPPA Law), cumulative sentences (imprisonment or fines) are replaced with vocational training of a duration consistent with the court's ruling. In the ruling, the judge sentenced the child "Rian" to imprisonment for 3 (three) years, reduced by the time already served in detention, along with a fine and vocational training for 3 (three) months at Griya Abhipraya, Class 1 Bapas in Medan.

Conclusion

The judge's reasoning in imposing a sentence of vocational training on a minor convicted of statutory rape in Judgment No. 70/Pid.Sus-Anak/2024/PN Medan. The court has imposed a sentence on the child consisting of imprisonment for 2 (years) and 6 (months) as well as vocational training for 3 (months) at Griya Abihprayya, Class 1 Bapas in Medan, and has ruled that the period of arrest and detention already served by the child shall be fully deducted from the imposed sentence. The basis for this is to demonstrate an effort to balance the elements of punishment and rehabilitation as mandated by the Law on the Juvenile Criminal Justice System, In accordance with Article 81(1) of Law No. 35 of 2014 Amending Law No. 23 of 2002 on Child Protection, the judge determined that the perpetrator had been legally proven to have committed the criminal act of sexual intercourse based on the victim's testimony, medical evidence, and the child's own protected confession.

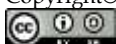
The judge followed the principles of restorative justice and vocational training for minors as stipulated in Law No. 11 of 2012 on the Juvenile Criminal Justice System, which emphasizes the protection of children's rights and the possibility of rehabilitation over retributive punishment, taking into account that the perpetrator was under 18 years of age. Compared to the minimal aggravating factors, mitigating factors—such as remorse and a



desire for forgiveness, a dysfunctional family background, a lack of parental supervision, and the opportunity for rehabilitation through vocational training—were deemed more significant. Consequently, the judge ruled that a vocational training sentence was a better alternative to imprisonment, with the aim of reintegrating the offender into society as a productive individual and avoiding ongoing social stigma. Additionally, the mediation process ensures justice for the victim.

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