



## Law Enforcement Policy in the Case of Double L Pill Abuse by Adolescents: A Study of the Ponorogo District Court Decision

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#### ABSTRACT

*The misuse of Double L pills among adolescents poses a serious threat to public health, moral values, and the future of the younger generation, including in Ponorogo Regency. This research analyzes Court Decision No. 75/Pid.Sus/2025/PN Png using a normative juridical approach to examine the judges' legal considerations in proving the elements of the criminal act, the application of Article 435 of Law No. 17 of 2023 on Health, and the imposition of sanctions on juvenile offenders from the perspectives of legal certainty, justice, and social utility. The study reveals that the panel of judges successfully proved all elements of the offense in a lawful and convincing manner, making the application of Article 435 appropriate and reflective of strong legal certainty. The defendant was sentenced to 2 years and 6 months imprisonment, with the defendant's young age and cooperative attitude considered as mitigating factors. Nevertheless, the aspects of substantive justice and utility, particularly regarding the guidance and rehabilitation of juvenile offenders, remain less than optimal. The research concludes that stronger collaboration among law enforcement agencies, local government, educational institutions, and the community is required through intensive legal education, early prevention, and recovery-oriented rehabilitation programs. Such measures will ensure that law enforcement is not merely retributive but also preventive and educative for the younger generation.*

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### INTRODUCTION

The misuse of Double L pills among adolescents has become an increasingly urgent public health and legal problem in Indonesia, as the circulation of hard drugs and pharmaceutical products without authorization continues to rise. National trends show that substance misuse is dominated by individuals aged 15–35, many of whom are students, indicating an escalating vulnerability among the younger population (Andi Lulu Isvany et al.,

2024). Although Double L pills are not classified as narcotics, they contain Trihexyphenidyl HCl an active substance capable of affecting the central nervous system and inducing euphoric effects making them dangerous when used without medical supervision (Annisa, 2024). These realities underscore the importance of strong legal intervention and explain why the misuse of Double L pills constitutes both a legal violation and a growing social problem requiring immediate scholarly attention. The ease of access to these substances, coupled with insufficient awareness among adolescents about the legal and health implications of misuse, further intensifies the urgency of examining how socio-legal factors shape patterns of adolescent drug behavior.

Preliminary observations from Ponorogo Regency reveal that the misuse and illegal distribution of Double L pills persist despite the presence of clear regulatory frameworks such as Law No. 17 of 2023 on Health and Government Regulation No. 72 of 1998 on Pharmaceutical Security. The case adjudicated in the Ponorogo District Court under Decision No. 75/Pid.Sus/2025/PN Png demonstrates this gap. The offender, a juvenile engaged in unauthorized distribution of Double L pills, was proven to have violated Article 435 of the Health Law, which prohibits the circulation of pharmaceutical products without official authorization. This preliminary judicial finding confirms that the legal norms have been sufficiently established, yet violations continue due to weak enforcement, low legal awareness, and socioeconomic pressures affecting adolescents. Such realities are consistent with earlier findings showing that adolescents often engage in substance misuse due to social influence, economic hardship, and inadequate parental supervision (Fatahillah et al., 2022). These factors indicate that adolescent involvement is shaped not only by legal loopholes but also by broader social environments that current legal instruments have not effectively addressed.

A number of previous studies have addressed the abuse of hard drugs and the challenges of legal enforcement in Indonesia. Fatahillah et al. (2022) emphasized that the lack of coordination among law-enforcement bodies and health agencies poses significant obstacles in addressing drug-related offenses, noting that enforcement fails when institutional communication is fragmented. Butarbutar (2024) highlighted that sentencing practices for juvenile offenders often lack rehabilitative emphasis, even though rehabilitation is critical to preventing reoffending among youth. Additionally, Alfarez et al. (2025) found that although Indonesia's regulatory framework on drug control is comprehensive, its implementation remains inadequate in deterring adolescent involvement in drug misuse, partly due to limited deterrent effects and persistent socioeconomic vulnerabilities. These studies collectively underscore systemic weaknesses but do not address Double L pill abuse in Ponorogo nor analyze judicial reasoning within a district-court decision. This gap is significant because pharmaceutical misuse unlike narcotic cases often escapes formal scrutiny, despite having similar psychoactive and harmful effects (Annisa, 2024).

This gap establishes the novelty of the present research. Unlike prior studies focusing on broader patterns of hard-drug use, this article analyzes a specific judicial ruling Decision No. 75/Pid.Sus/2025/PN Png linking judicial reasoning with the foundational principles of legal certainty, justice, and utility. At the same time, it situates Double L pill misuse within the lived experiences of adolescents, thereby integrating legal and sociological perspectives. This dual approach provides a more holistic understanding of how legal norms operate in practice and how judicial decisions reflect the balancing of normative principles with the social conditions surrounding youth offenders. Earlier works such as those by Butarbutar (2024) and Pramita (2025) have stressed the importance of incorporating rehabilitative and restorative justice

principles in handling juvenile offenders; however, they did not examine how such considerations are reflected in actual judicial reasoning in pharmaceutical-misuse cases. By analyzing both the doctrinal and contextual dimensions, this research fills a scholarly void in the intersection of juvenile behavior, pharmaceutical regulation, and judicial practice.

In establishing its analytical stance, this research supports the argument of prior studies that current enforcement remains insufficiently optimized, yet it also challenges earlier conclusions by demonstrating, through direct judicial analysis, that courts are increasingly attentive to both punitive and rehabilitative dimensions. The Ponorogo case shows that judges applied Article 435 consistently, but the resulting sentence also reflected considerations of youth, cooperation, and social vulnerability. This indicates that judicial practice may be moving toward balancing retributive aims with restorative objectives an approach that earlier scholars argued was lacking (Butarbutar, 2024; Pramita, 2025). The case further shows that courts may be evolving in their understanding of the social risks associated with pharmaceutical misuse, in line with Amanda and Dewi's (2024) emphasis on the public-health implications of uncontrolled pharmaceutical circulation. Thus, the findings suggest that judicial attitudes toward adolescent drug offenders are becoming more nuanced, especially in district-level courts where the majority of such cases are adjudicated.

Moreover, the present study contributes to ongoing debates about legal certainty by examining how judges interpret statutory elements in pharmaceutical-offense cases involving juveniles. It also enriches discourse on adolescent vulnerability by illustrating how courts contextualize youth behavior within broader social pressures such as poverty, peer influence, and accessibility of psychoactive substances. Given the rise of pharmaceutical misuse among adolescents documented both in national trends and regional findings the need to understand judicial responses becomes essential for assessing the effectiveness of existing legal frameworks (Alfarez et al., 2025). The analysis of judicial reasoning provides valuable insights into how legal norms are operationalized and how courts weigh multiple considerations, including deterrence, social harm, vulnerability, and the potential for rehabilitation, when enforcing pharmaceutical regulations. These analytical outcomes are important not only for academic enrichment but also for informing practical reforms in pharmaceutical-law enforcement and juvenile-justice policy.

Based on the urgency of rising adolescent involvement in Double L pill misuse, the supporting preliminary findings from the court decision, and the identified research gap, this study aims to analyze the judges' legal considerations in proving the elements of the criminal act and establishing the legal foundation for sentencing, as well as to evaluate how Indonesia's criminal-law regulations on hard-drug misuse fulfill the principles of legal certainty, justice, and social utility. Through this analysis, the research seeks to contribute substantively to scholarly discourse on legal enforcement, juvenile protection, and the implementation of health-law norms in Indonesia. Ultimately, this study aspires to strengthen the understanding of how judicial decisions shape broader enforcement practices and how more effective legal strategies can be developed to protect adolescents from the dangers of pharmaceutical misuse.

## METHODS

This research applies a normative juridical method combined with a structured literature-based analysis to examine the judicial reasoning in Ponorogo District Court Decision No. 75/Pid.Sus/2025/PN Png regarding the misuse of Double L pills by adolescents. The normative

approach is used to interpret statutory provisions, legal doctrines, and judicial decisions in accordance with established legal principles, similar to approaches applied in previous studies examining the enforcement of pharmaceutical law and criminal liability (Juliana, 2024; Amanda & Dewi, 2024). The method relies on primary legal materials, including Law No. 17 of 2023 on Health, Government Regulation No. 72 of 1998, and the court decision analyzed through the full case narrative included in the uploaded document. Secondary materials are obtained from scholarly works that explain legal certainty, justice, and utility in sentencing, as discussed by Butarbutar (2024), Pramita (2025), and Rivanie et al. (2022), which provide theoretical grounding for evaluating the legal considerations adopted by the judges.

The use of literature as a central analytic source requires modification of conventional normative methods to ensure the coherence and depth of analysis. Instead of relying solely on interpretation of legal norms, this study incorporates analytical patterns commonly used in literature-based legal research, such as examining thematic findings from prior works on pharmaceutical offenses, juvenile criminal responsibility, and enforcement barriers (Fatahilla et al., 2022; Alfarez et al., 2025; Imra et al., 2025). These publications help situate the Ponorogo case within broader enforcement challenges identified in previous studies. The adaptation is necessary because the phenomenon of Double L pill abuse involves interconnected legal, social, and health-related dimensions, making literature synthesis essential for constructing a comprehensive doctrinal analysis.

The research procedure begins with identifying central legal questions relating to the fulfillment of the elements of Article 435 of the Health Law and the compatibility of the judicial reasoning with the goals of criminal law. Relevant legal sources and academic literature are collected through document tracing, including statutory texts, judicial decisions, journal articles, and legal analyses found in the uploaded manuscript. Screening is conducted by selecting only authoritative and peer-reviewed writings, consistent with approaches used by previous authors examining hard-drug distribution and unauthorized pharmaceutical circulation (Firnawati & Yunus, 2024; Amalina, 2024). Data from these sources are then extracted into an analytic matrix containing legal norms, case facts, doctrinal opinions, and thematic insights relating to legal certainty, justice, and utility.

Data analysis is carried out through qualitative content analysis, where statutory provisions, judicial reasoning, and scholarly discussions are compared and interpreted systematically. This technique has been used in studies evaluating court decisions and their consistency with legal principles (Hadi et al., 2025; Khairunnisa & Rasji, 2024). The analysis involves identifying how each element of the offense was proven, how the judges interpreted statutory language, and how mitigating considerations were weighed, following patterns also found in prior examinations of criminal sanctions for juveniles (Butarbutar, 2024). Triangulation is achieved by comparing the judicial reasoning with doctrinal writings that discuss proportionality, fairness, and rehabilitative considerations in sentencing, particularly in cases involving youth offenders (Pramita, 2025; Yudhayana & Aziz, 2024). This ensures that the evaluation of judicial reasoning is supported by consistent theoretical foundations rather than mere descriptive interpretation.

Throughout the process, the study maintains methodological rigor by ensuring that all data sources are verifiable and publicly accessible legal or scholarly documents, as demonstrated in the manuscript provided. Ethical considerations are respected by discussing personal information found in the decision solely within academic and legal-analysis boundaries. As a

whole, this method enables a comprehensive examination of how the Ponorogo District Court applied Article 435, how its reasoning aligns with doctrinal expectations found in the literature, and how the decision reflects the principles of legal certainty, justice, and social utility.

## RESULTS AND DISCUSSION

The analysis of Ponorogo District Court Decision No. 75/Pid.Sus/2025/PN Png demonstrates that the judges successfully established all elements of the offense under Article 435 of Law No. 17 of 2023 concerning the circulation of pharmaceutical preparations without authorization. The evidentiary materials, including witness statements, confiscated Double L pills, and the defendant's admission, were assessed through a structured consideration that prioritizes the factual chronology and the legal status of the seized pharmaceutical products. The results show that the judges identified the essential element of "unauthorized distribution of hard drugs" based on laboratory confirmation and the absence of any license permitting the defendant to store or sell Trihexyphenidyl-containing pills, thereby meeting the statutory criteria for criminal liability. This indicates that the court's factual findings were sufficiently reliable and aligned with the evidentiary standard required for offenses involving unauthorized pharmaceutical products.

The judicial examination further indicates that the panel of judges ensured the internal consistency of witness statements by cross-checking them with the chronological reconstruction of events and the physical evidence collected during the search. This method of correlating oral testimony with tangible proof is essential in confirming the credibility of the prosecution's argument, as emphasized by Hadi et al. (2025), who noted that judicial confidence must rest on convergent evidentiary findings. In this case, the judges' systematic approach strengthened the foundation for establishing the defendant's involvement and eliminated potential ambiguities that often weaken prosecutions in pharmaceutical-related offenses.

The discussion of these findings suggests several important implications for legal enforcement and juvenile crime prevention. First, the judges' reasoning reflects the application of proportional sanctions by considering the defendant's status as a juvenile, his cooperation during the investigation, and the limited scale of distribution. This approach echoes the normative expectation that sentencing for youth offenders must incorporate rehabilitative emphasis, a principle similarly observed in studies on criminal responsibility for minors (Khairunnisa & Rasji, 2024; Butarbutar, 2024). Second, the decision demonstrates that the enforcement of pharmaceutical regulations remains feasible even at the district-court level, provided that factual verification is supported by laboratory reports and consistent witness examination. This finding aligns with previous literature highlighting that effective handling of drug-related offenses depends on coordinated investigative procedures rather than merely the severity of statutory penalties (Imra et al., 2025).

Another noteworthy result concerns the court's recognition of the broader societal impact of unauthorized Double L pill circulation. By framing the offense not only as a violation of pharmaceutical regulations but also as a threat to adolescent well-being, the judgment reflects an increasing judicial awareness of the public-health dimension of drug misuse. This is consistent with Amanda and Dewi (2024), who found that law enforcement must address pharmaceutical violations as part of a wider social risk, especially when involving substances that are easily

accessible and frequently misused by youth. The Ponorogo decision thus enhances the preventive function of judicial intervention by reinforcing the seriousness of pharmaceutical abuse.

A comparison with earlier studies also underscores the significance of this case. Research on unauthorized pharmaceutical circulation in other regions found that enforcement often falters due to weak monitoring, inconsistent administrative controls, and limited public awareness (Amanda & Dewi, 2024; Juliana, 2024). However, the Ponorogo court's decision shows a stronger reliance on documentary and scientific evidence, thereby filling an enforcement gap identified in those studies. Likewise, the present findings differ from the challenges reported by Firnawati and Yunus (2024), who argued that local enforcement frequently struggles in proving the "without authorization" element due to incomplete evidentiary tracing. In contrast, the Ponorogo case demonstrates that precise documentation and corroborated testimony can overcome this challenge and produce clearer judicial reasoning.

In addition, the judges' decision shows a clear sensitivity to the rehabilitative potential of juvenile offenders. This aligns with Butarbutar (2024), who argued that the juvenile justice framework demands sanctions that maintain accountability while still enabling character development. The Ponorogo court's approach offering a structured penalty but acknowledging the defendant's young age and cooperative behavior reflects a balanced penal philosophy. Such an approach resonates with Pramita's (2025) view that restorative alternatives should be integrated into sentencing for youth-related drug cases to reduce recidivism and promote reintegration.

Furthermore, the results contribute additional insight into the role of judicial considerations in shaping the effectiveness of pharmaceutical regulation. The judges not only confirmed the legal violation but also articulated the social risk posed by the misuse of Double L pills among adolescents, which strengthens the deterrent value of the ruling. This approach directly supports arguments made by Pramita (2025), who noted that sentencing decisions should integrate preventive and restorative rationales, especially in cases involving vulnerable young offenders. By grounding its reasoning in both statutory requirements and social realities, the Ponorogo District Court provides an example of how legal certainty, justice, and utility can operate concurrently in pharmaceutical-law enforcement.

The case also highlights the ongoing challenge of pharmaceutical supervision in local environments, especially where the circulation of hard drugs is driven by informal networks and insufficient regulatory oversight. Issues of weak monitoring and limited administrative control, as identified by Firnawati and Yunus (2024), continue to hinder enforcement across many regions. Unlike cases where insufficient evidence obstructs prosecution, the Ponorogo decision demonstrates how coordinated investigative procedures document verification, laboratory testing, and consistent witness examination can effectively overcome these barriers. Therefore, this decision provides a model for enhancing prosecutorial effectiveness in similar drug-related cases across other jurisdictions.

Overall, the combined results and discussion clarify that the court's decision is not merely a mechanical application of statutory norms but also a demonstration of responsive judicial practice. The reasoning offers practical benefits by affirming that structured evidentiary assessment, supported by administrative and scientific verification, is effective in addressing unauthorized drug distribution involving adolescents. These findings therefore strengthen existing scholarly assertions about the importance of procedural coherence and rehabilitative

consideration in juvenile-related offenses while also showing that district-level courts can play a decisive role in enhancing pharmaceutical-law enforcement..

## CONCLUSION

From the analysis of Decision Number 75/Pid.Sus/2025/PN Png it shows that the law enforcement of the case of hard drug abuse has been carried out in accordance with statutory regulations, especially the provisions of Article 435 of the Health Law Number 17 of 2023. The panel of judges has conducted a thorough examination of the fulfillment of all elements of the offense and determined the appropriate legal basis, so that the resulting verdict succeeded in realizing the principle of legal certainty. The judges' considerations also show a balance between aspects of justice and utility, because the perpetrator, who is still young, is still given the opportunity to improve himself even though he must undergo punishment. However, the social reality underlying this case shows that law enforcement alone is not sufficient to prevent the abuse of hard drugs among adolescents. Handling this problem must be accompanied by educational and preventive approaches so that the law does not only function to punish, but also educate the public to be more aware of and obedient to the rules.

The Ponorogo Regency Government should strengthen cooperation between law enforcement officials, the Health Office, schools, and the community in the form of regular outreach programs regarding the dangers of hard drug abuse. These activities need to be carried out continuously in educational and community environments so that adolescents have stronger legal knowledge and moral awareness to avoid deviant behavior such as the circulation and abuse of Double L Pills.

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