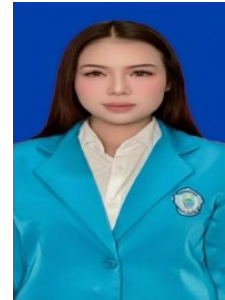




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JURIDICAL ANALYSIS OF THE CRIME OF TRAFFICKING DANGEROUS COSMETICS WITHOUT A DISTRIBUTION PERMIT IN DECISION NUMBER 54/Pid.Sus/2026/PN Cbn

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Abstract

Background. The distribution of cosmetics that fail to meet safety and quality standards constitutes a legal issue that may endanger consumers. This issue is reflected in Decision Number 54/Pid.Sus/2026/PN Cbn concerning the distribution of pharmaceutical preparations in the form of

cosmetics that failed to meet safety, efficacy, and quality requirements and lacked proper distribution authorization.

Aims. This study aims to analyze the application of criminal law provisions to the distribution of hazardous cosmetics and examine the legal considerations of the panel of judges in rendering the decision.

Methods. This study employs a normative juridical method using a statutory approach and a case approach, with the primary legal material consisting of Decision Number 54/Pid.Sus/2026/PN Cbn and relevant statutory provisions.

Result. The results indicate that the defendant's actions fulfilled all elements of Article 435 of Law Number 17 of 2023 concerning Health in conjunction with Appendix I Number 181 of Law Number 1 of 2026 concerning Criminal Adjustment. Laboratory examination established that several cosmetic products contained hazardous substances, namely mercury and hydroquinone. The panel of judges considered the defendant's culpability, personal circumstances, and principles of justice in determining the type and amount of punishment.

Conclusion. In conclusion, the defendant was legally and convincingly proven guilty of distributing pharmaceutical preparations that failed to meet standards, safety requirements, and quality requirements and was sentenced to a fine of IDR 120,000,000.00.

Keywords: criminal offense; hazardous cosmetics; pharmaceutical preparations; judicial consideration; health law

INTRODUCTION

Cosmetics are widely used in daily life to support care and appearance. The high public demand for cosmetic products also encourages the development of cosmetic production and trade activities. However, these conditions can create legal problems if products in circulation do not meet safety, quality, and licensing standards. Cosmetics without a distribution permit and containing hazardous ingredients can pose a risk to public health. Therefore, the circulation of cosmetics is not only related to business activities, but is also part of public health protection that must be supervised and enforced through legal provisions.

This problem is illustrated in Decision Number 54/Pid.Sus/2026/PN Cbn, which is the object of study in this article. The case involved the defendant Mury Listyowati, who produced and distributed LC Beauty brand cosmetics. Based on the facts of the trial, the products produced in the form of toners, facial soaps, day creams, and night creams do not have a notification number or distribution permit. The products are also produced through a repackaging process with manual and unhygienic equipment.

The legal phenomenon discovered during the implementation of PPL shows that the problem of illegal cosmetic circulation does not stop at administrative issues regarding distribution permits. In the case studied, the results of laboratory examinations of LC Beauty



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products showed the presence of mercury and hydroquinone, which are harmful ingredients that are prohibited from being used in cosmetics. Experts from BPOM explained that these two ingredients can cause various health risks, including irritation, ochronosis, damage to the nervous system and kidneys, and the risk of cancer. Thus, this case shows a link between violations of licensing requirements and the protection of consumer safety and health

Normatively, business actors who distribute cosmetics are obliged to ensure that the products distributed meet quality, safety, and utility standards and obtain a distribution permit or notification. In this case, the criminal provisions applied are Article 435 of Law Number 17 of 2023 concerning Health in conjunction with Attachment I Number 181 of Law Number 1 of 2026 concerning Criminal Adjustment. The Panel of Judges then stated that all elements of the article were fulfilled and the defendant was legally and convincingly proven to have committed the crime of distributing pharmaceutical preparations that do not meet standards, safety requirements, and quality.

However, there is a gap between normative provisions and law enforcement practices. Normatively, the criminal act has a severe criminal threat, while in practice the Panel of Judges considers various circumstances inherent in the defendant in determining the type of crime. In this case, the judge considered the condition of the defendant as a woman who has an immature child, the defendant's health condition, the defendant's remorse, and the absence of consumers or other parties who stated that they were harmed. These considerations then directed the judge to impose a fine as a form of punishment that is considered fairer and more appropriate than imprisonment. In the end, the defendant was sentenced to a fine of Rp120,000,000.00. This condition is interesting to study because it shows how the application of criminal law in dangerous cosmetics cases is not only determined by the fulfillment of the elements of the criminal act, but also by individual considerations and fairness in the sentence.

Research on the crime of distributing cosmetics without a distribution permit has been carried out with various perspectives. Isnaini and Astuti (2021) analyzed Decision Number 102/Pid.Sus/2019/PN Trg with a focus on the judge's consideration and the suitability of criminal sanctions with the value of community justice. The results of the study showed that the crime imposed on the defendant was considered too light because the defendant not only distributed, but also produced cosmetics without a distribution permit, so more adequate punishment is needed as an effort to provide a deterrent and protection effect to the community.

Furthermore, Iha (2020) examines the liability of perpetrators of the crime of distributing cosmetics without a distribution permit based on Decision Number 2/Pid.Sus/2019/PN Msh. The research focuses on the qualification of criminal acts based on Article 197 jo. Article 106 paragraph (1) of Law Number 36 of 2009 concerning Health and the judge's legal considerations in imposing a penalty.

Rahmayani's research (2025) then examined Decision Number 237/Pid.Sus/2024/PN Bjn regarding cosmetic resellers who did not meet safety standards and distribution permits. The results showed that the defendant was found guilty of distributing pharmaceutical preparations in the form of cosmetics without a permit and was sentenced to a fine of IDR 50,000,000.00. The research shows the development of the implementation of Law Number 17 of 2023 concerning Health in handling cosmetic cases that do not meet safety and licensing requirements.

The most recent research was conducted by Alfarekshi (2026) through a study of Decision Number 436/Pid.Sus/2025/PN Ptk. The research analyzed criminal fines against perpetrators of cosmetic circulation who do not meet standards, using electronic systems and applying Article 435 of Law Number 17 of 2023 concerning Health. The results showed that the judge imposed a fine of IDR 15,000,000.00, considering the defendant's status as a small-business actor and the backbone of the family.

Previous research on cosmetic crimes has discussed judges' considerations, criminal liability, security standards, distribution permits, and the application of criminal sanctions. However, research on Decision Number 54/Pid.Sus/2026/PN Cbn has not been found in the previous research that has been explored. Therefore, this article is novel in its analysis of the application of Article 435 of Law Number 17 of 2023 concerning Health in cosmetic cases involving products without a distribution permit that laboratory testing proves contain mercury and hydroquinone. In addition, this article examines how laboratory examination results are used to prove the fulfillment of the elements of the crime and how the Panel of Judges considers the defendant's circumstances and the aspect of justice in imposing a fine.

Contemporary research on illegal cosmetic distribution in Indonesia has evolved from examining violations of distribution permits and criminal liability under the former Health Law toward evaluating safety standards, criminal fines, and judicial considerations under Law No. 17 of 2023 concerning Health. Earlier studies emphasized the suitability of sanctions, qualification of criminal offenses, liability of cosmetic resellers, and the imposition of fines, including cases involving electronic distribution. This study advances the literature by

examining Decision Number 54/Pid.Sus/2026/PN Cbn through an integrated analysis of Article 435 of Law No. 17 of 2023, laboratory findings of mercury and hydroquinone, expert evidence, and judicial considerations concerning culpability and justice. The article's Introduction explicitly summarizes previous studies and their respective focuses. The article's specific legal focus is also consistent with this positioning: it investigates how Article 435 is applied to trafficking in dangerous cosmetics and how the panel of judges constructs its legal reasoning when imposing punishment.

METHODS

This research uses empirical juridical research, which examines applicable legal provisions by looking at their application in practice in the field. This research was conducted to obtain an overview of the application of legal provisions to the crime of cosmetic circulation that does not meet safety and quality standards as studied in Decision Number 54/Pid.Sus/2026/PN Cbn.

The approach used is a sociological juridical approach, which is an approach that examines the law by relating the provisions of laws and regulations to legal conditions and practices in society. This approach is used to examine how provisions regarding cosmetic circulation, distribution permits, safety standards, and quality are applied in practice and how the law enforcement process is carried out.

The data sources in this study consist of primary data and secondary data. Primary data were obtained directly through observations and interviews during the implementation of Field Experience Practice (PPL), especially related to the process and practice of handling legal cases that are the object of the study. Secondary data was obtained from Decision Number 54/Pid.Sus/2026/PN Cbn, laws and regulations related to health crimes and cosmetic circulation, books, scientific journals, and other literature sources relevant to research problems.

Data collection techniques include observation, interviews, and documentation. Observation is carried out by directly observing activities and processes related to the implementation of PPL. Interviews are conducted to obtain information from parties related to the object of research. Documentation is carried out by collecting and studying legal documents, court decisions, laws and regulations, and other relevant supporting documents.

The obtained data is then analyzed using qualitative descriptive analysis. The analysis is carried out by systematically describing the data obtained, then connecting it with applicable legal provisions to provide an overview of how the law is applied and the considerations in

settling cases. The results of the analysis are then presented descriptively to answer the research problem.

DISCUSSION

Overview of Agencies

The Cirebon District Court is one of the public judicial institutions that examines, adjudicates, and decides cases at the first level. Based on the materials obtained during the implementation of Field Experience Practice (PPL), the history of the establishment of the Cirebon Class IB District Court is inseparable from the development of the judicial system during several periods of government, namely the Dutch East Indies government, the period of the Republic of the United Indonesia (RIS), and the government of the Republic of Indonesia.

1. Reign of the Dutch East Indies

During the Dutch East Indies rule, the Cirebon Class IB District Court was known as Landrechter (Nicywestijl). The institution had the authority to decide cases, especially civil cases. After Indonesia's independence, the institution then developed into the District Court. At that time, the Cirebon District Court was still located on Jalan Pengampon Number 02, Cirebon. Its jurisdiction covers Region III of Cirebon, including Cirebon, Indramayu, Kuningan, and Majalengka.

2. Period of the Government of the Republic of Indonesia (RIS)

On August 17, 1950, the judiciary's power structure and procedural law began to be standardized across all regions of Indonesia under Law Number 2 on Civil Justice. In the development of the judicial system, there are several judicial environments, namely:

- a. General Court or District Court;
- b. Military Justice;
- c. State Administrative Court (TUN);
- d. Religious Courts; and
- e. The Supreme Court (MA) as the highest judicial body that has the function of supervision over other judicial bodies in accordance with the provisions of laws and regulations.

These developments also affect the position and implementation of the Cirebon District Court as part of the general judicial environment.

3. Period of Government of the Republic of Indonesia

In 1974, the Cirebon Class IB District Court, which was previously located on Jalan Pengampon, moved to Jalan Dr. Wahidin Sudirohusodo Number 18, Cirebon. The Cirebon District Court Building was built in 1973–1974 in Pelita I Year V. The ownership status of the building was recorded at the Ministry of Justice based on the provisions dated April 1, 1973 Number 51/12/1973. In its development, the division of jurisdiction of the Cirebon District Court has changed. Based on the division of work areas that have been in effect since 1982, the jurisdiction of the Cirebon Class IB District Court includes the jurisdiction of Cirebon City, while the jurisdiction of Cirebon Regency is the authority of the Source District Court. Therefore, the division of jurisdiction places the Cirebon Class IB District Court as a judicial institution that specifically handles cases within the jurisdiction of Cirebon City. The existence of the Cirebon District Court has an important role in providing services and law enforcement for the community, including in handling criminal cases related to violations in the health sector as the object of study in this study.

Results of PPL Implementation

During the implementation of Field Experience Practice (PPL) at the Cirebon District Court, students are involved in various activities related to judicial administration and services. These activities give students opportunities to observe and understand firsthand the case administration process in the court environment.

The activities include managing and recording case administration, preparing and arranging case files, filling evidence registers, and filling search and confiscation registers. Students also carry out administrative activities such as preparing documents, including receipts for case transfer letters and receipts for the submission of evidence. These activities provide an understanding of the importance of accuracy, neatness, and precision in the management of case documents because each document is part of the judicial administration process.

In addition to case administration activities, students also have the opportunity to observe the implementation of legal consultation services to the community. Through these activities, students get an overview of how services are provided to people who need information or consultation related to legal issues. Students also organize and archive case documents systematically, so that documents can be stored properly and are easier to find when needed.

Implementing these activities provides students with practical experience in understanding the mechanisms of judicial administration and legal document governance. PPL activities also help improve students' skills in recording, managing, compiling, and archiving documents carefully and systematically. In addition, the experience gained during PPL allows students to connect theoretical knowledge from lectures with the practice of administering justice directly.

Legal Issues

During the implementation of the Field Experience Practice (PPL) at the Cirebon District Court, one of the legal problems found was related to the criminal act of distributing cosmetics that did not meet the standards of safety, efficacy, usefulness, and quality. This problem was chosen because it is highly relevant to public health protection and shows how health law provisions are applied in judicial practice through Decision Number 54/Pid.Sus/2026/PN Cbn.

The case began with the discovery of the production and circulation of LC Beauty brand cosmetics carried out without a distribution permit (notification number) from the Food and Drug Supervisory Agency (BPOM). Based on the facts of the trial, the defendant produced various types of cosmetics in the form of toner, facial wash, day cream, and night cream through a repacking process using other cosmetic ingredients and simple equipment that did not meet hygienic standards. The product was then distributed to the public as ready-to-use cosmetic products.

The legal problem became even more serious because the results of the Minutes of the Criminal Laboratory Examination, corroborated by the testimony of BPOM experts, stated that the cosmetic product tested positive for mercury (Mercury) and hydroquinone (Hydroquinone), which are harmful ingredients prohibited in cosmetics. The expert explained that these ingredients risk causing irritation, skin discoloration, ochronosis, damage to the nervous system and kidneys, and are carcinogenic to human health.

From a legal perspective, the defendant's actions met the elements of a criminal act as stipulated in Article 435 of Law Number 17 of 2023 concerning Health, in conjunction with Attachment I Number 181 of Law Number 1 of 2026 concerning Criminal Adjustment. The Panel of Judges stated that all elements of the criminal act had been legally and convincingly proven because the defendant deliberately circulated pharmaceutical preparations in the form of cosmetics that did not meet standards, safety requirements, and quality.

Based on these findings, the legal issues that are the focus of this article are how to apply Article 435 of Law Number 17 of 2023 concerning Health to the crime of trafficking in dangerous cosmetics and how the legal considerations of the Panel of Judges in imposing criminal penalties on the defendant. This problem was chosen because it reflects the relationship between public health protection, criminal law enforcement, and criminal policy in administering justice.

Legal Analysis

1. Analysis Based on Laws and Regulations

The problem in Decision Number 54/Pid.Sus/2026/PN Cbn is related to the circulation of cosmetics that do not meet safety, efficacy or usefulness, and quality standards. Article 138 of Law Number 17 of 2023 concerning Health stipulates that pharmaceutical preparations must meet safety, efficacy or usefulness, and quality standards. In addition, cosmetics distributed in Indonesia must have a distribution permit in the form of a notification, as stipulated by BPOM regulations.

In this case, LC Beauty products did not have a notification number, and laboratory test results showed the presence of mercury and hydroquinone. The product was also produced through a *repacking* process using simple and unhygienic equipment. Therefore, the defendant's actions met the criminal provisions of Article 435 of Law No. 17 of 2023 concerning Health as applied in the verdict.

2. Analysis Based on Legal Principles

The application of the law in this case aligns with the principle of legality because the defendant's punishment is based on criminal provisions regulated by law and regulations. In addition, law enforcement also reflects the principle of public protection because the prohibition on the circulation of dangerous cosmetics aims to protect consumer health.

3. Analysis Based on Doctrine

In criminal law doctrine, criminal liability depends on the existence of a criminal act and the perpetrator's fault. In this case, the Panel of Judges considered that the defendant's actions were not just negligence (*culpa*), but were carried out with will and awareness (*weten en willen*). The assessment was based on the fact that the defendant actively repacked and distributed the cosmetics within a certain period.

4. Analysis Based on Expert Verdicts and Opinions

The results of laboratory examinations and BPOM expert testimony have an important role in proving that cosmetics contain mercury and hydroquinone. The expert explained

that these two ingredients risk harming human health, including causing irritation, ochronosis, nerve and kidney damage, and cancer. Thus, the evidence in this case is not only based on witness testimony, but also strengthened by scientific evidence.

5. Criminal Analysis

Although the defendant was found to have committed a criminal act, the Panel of Judges also considered the defendant's personal circumstances, such as health conditions, responsibility for children, remorse, and justice considerations. These considerations became the basis for the judge in determining the type and amount of the crime. The defendant was then sentenced to a fine of Rp120,000,000.00.

Based on this analysis, it can be concluded that the application of the law in Decision Number 54/Pid.Sus/2026/PN Cbn has been based on the fulfillment of the elements of the criminal act, supported by laboratory evidence and expert testimony, and considering aspects of the defendant's fault and personal circumstances in determining the sentence.

Recommendations

Based on the results of the analysis of Decision Number 54/Pid.Sus/2026/PN Cbn, it is necessary to strengthen supervision of the production and circulation of cosmetics, especially products without distribution permits that may contain harmful ingredients. BPOM and law enforcement officials need to increase supervision of places where cosmetics are produced, distributed, and sold, including products marketed online. In addition, education for business actors and the public needs to be improved so that business actors understand the obligation to meet safety standards and distribution permits, while consumers have the awareness to check the legality and safety of products before use. In law enforcement, laboratory inspections also need to be strengthened because scientific test results play an important role in proving the presence of harmful ingredients in cosmetics.

Aspect	Previous Studies / State of the Art	Position of the Current Study
Legal analysis of illegal cosmetic distribution	Isnaini and Astuti (2021) analyzed Decision No. 102/Pid.Sus/2019/PN Trg, particularly judges' considerations and whether the imposed criminal sanction reflected community justice. Their study argued that the punishment was relatively light considering that the defendant both produced and distributed cosmetics without authorization.	The present study focuses on a newer decision, Decision No. 54/Pid.Sus/2026/PN Cbn, under the current Health Law framework.

Aspect	Previous Studies / State of the Art	Position of the Current Study
Criminal liability of cosmetic distributors	Iha examined criminal liability for distributing cosmetics without a permit based on Decision No. 2/Pid.Sus/2019/PN Msh, emphasizing the qualification of the offense and judicial consideration under the previous Health Law framework.	This article examines criminal liability under Article 435 of Law No. 17 of 2023, reflecting a more recent regulatory framework.
Safety standards and distribution permits	Rahmayani (2025) examined Decision No. 237/Pid.Sus/2024/PN Bjn concerning cosmetic resellers whose products did not meet safety and licensing requirements. The defendant was sentenced to a fine of IDR 50 million.	The current article extends this discussion from licensing violations to the relationship between licensing, product safety, scientific evidence, criminal liability, and sentencing.
Criminal fines under the new Health Law	Alfarekshi (2026) studied Decision No. 436/Pid.Sus/2025/PN Ptk concerning cosmetics distributed through electronic systems and analyzed fines imposed under Article 435 of Law No. 17 of 2023. The judge considered the defendant's status as a small business actor and family provider.	The present research addresses a different dimension: the evidentiary role of laboratory testing confirming mercury and hydroquinone, together with individualized judicial considerations in selecting a fine rather than imprisonment.

Despite the growing body of legal research on the distribution of cosmetics without authorization, previous studies have predominantly examined criminal liability, licensing violations, product safety standards, and judicial sentencing separately. Limited attention has been given to the interaction between scientific laboratory evidence of prohibited cosmetic substances, the fulfillment of criminal elements under Article 435 of Law No. 17 of 2023 concerning Health, and individualized judicial considerations in determining criminal sanctions. Moreover, Decision Number 54/Pid.Sus/2026/PN Cbn has not been specifically examined in the previous studies reviewed. This leaves a research gap concerning how scientific evidence of hazardous ingredients is integrated into criminal proof and subsequently balanced with considerations of culpability, personal circumstances, public health protection, and substantive justice in sentencing.

The novelty of this study lies in its integrated juridical analysis of Decision Number 54/Pid.Sus/2026/PN Cbn by connecting the application of Article 435 of Law No. 17 of 2023 concerning Health with scientific laboratory evidence confirming mercury and hydroquinone in unauthorized cosmetics and with the judicial reasoning used to determine criminal sanctions. Unlike previous studies that mainly focus on licensing violations, criminal liability, or sentencing, this research demonstrates how scientific proof of hazardous substances contributes to establishing the elements of the offense while judges simultaneously consider

the defendant's culpability, personal circumstances, proportionality, and substantive justice in determining the appropriate punishment.

CONCLUSION

Conclusion

Based on the results of the research and discussion, it can be concluded that the application of Article 435 of Law Number 17 of 2023 concerning Health in Decision Number 54/Pid.Sus/2026/PN Cbn is in accordance with the legal facts revealed at the trial. The defendant was proven to have produced and distributed LC Beauty cosmetics that lacked a distribution permit and did not meet safety and quality standards. This was supported by laboratory test results showing the presence of mercury and hydroquinone in the cosmetic products.

The Panel of Judges' consideration in imposing the sentence is also based on the fulfillment of the elements of the criminal act, the defendant's fault, evidence, expert testimony, and the defendant's personal circumstances. The judge assessed that the defendant's actions were carried out with awareness and will, not solely due to negligence. On the other hand, the defendant's personal circumstances and aspects of justice were also considered in determining the sentence. For his actions, the defendant was sentenced to a fine of Rp120,000,000.00.

Suggestions

1. Divide Agencies

District Courts and related agencies, especially law enforcement officials and BPOM, are expected to continue to improve coordination in handling cases of cosmetic circulation that do not meet standards. Supervision and inspection of cosmetic products also need to be carried out on an ongoing basis to prevent the circulation of products that endanger the community.

2. For the Faculty

The faculty is expected to improve learning and practice activities that provide students with an understanding of the direct application of the law. PPL activities need to be continuously developed so that students not only understand legal theory but also gain experience in administration, service, and law enforcement processes in the judicial environment.

3. For the Next Researcher

The next researcher is expected to be able to develop research on the crime of cosmetic circulation using different case objects or decisions. The next research can also examine the aspects of consumer protection, the effectiveness of BPOM supervision, the circulation of cosmetics through digital platforms, and the comparison of criminality in similar cases.

4. For Policymakers

Policymakers are expected to strengthen regulations and supervision mechanisms for the production and circulation of cosmetics, especially the practice of *repacking* and marketing through electronic media. Strengthening supervision is needed so that provisions regarding the safety, quality, and distribution permits of cosmetics can be implemented effectively and provide optimal protection for the community.

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