



Action Management of Commercial Sex Worker Cases

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Abstract: This study aims to determine a qualitative study of handling cases of commercial sex workers. The method used in this study is empirical legal research methodology and uses a qualitative approach to descriptive qualitative analysis techniques. The results of this study indicate that law Enforcement in Handling Commercial Sex Workers (PSK) in Gorontalo City is carried out in two ways, namely preventive enforcement and repressive enforcement. Preventive enforcement of course there are various steps taken to prevent the practice of prostitution, namely legal counseling, conducting patrols, and giving warnings. Meanwhile, repressive enforcement is carried out in two ways, namely coaching and inviting parents. So that from law enforcement it can be seen that there has been no implementation of the provisions of regional regulations that have been made such as the imposition of criminal sanctions, but only the imposition of social sanctions by the law enforcers themselves.

Keywords: Action; Countermeasures; Prostitute

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How to cite (Chicago Style):

Gumalangit, K. Action Management of Commercial Sex Worker Cases." *Estudiante Law Journal*. Vol. 5 (2), 2023: 456–469

1. Introduction

The 1945 Constitution as the Indonesian constitution is the result of the long contemplation experienced by the Indonesian people in searching for, multiplying, and exploring constitutional ideas that are suitable and appropriate to be implemented in this country.¹Indonesia is the highest agreement of the state's formers, even though it has experienced a constitutional test when the 1945 Constitution was amended into the Constitution of the United Republic of Indonesia in 1949, even so the recognition of the regions under the auspices of the State of Indonesia is still recognized.²Therefore, in legal politics, a legal discovery and new law-making that is in accordance with the goals of the State is a value that must be implemented in order to achieve legal supremacy and justice.³ Because the absolute condition for state sovereignty is the existence of a society that obeys the constitution and its government.⁴

In our daily lives, even in society, in order to make ends meet, there are often crimes and violations committed by certain people and people who threaten some members of society, which in law is known as criminal acts.⁵The existence of technology makes it easier for people to get information both domestically and abroad, but a lot of negative information becomes food for people in all walks of life, especially among teenagers, such as watching pornography, pornography and other societal ailments. If not controlled, of course, this will become uncontrolled freedom, such as sexual freedom. This sexual freedom will become a violation of decency that deviates in society so that criminal acts of decency will occur. Violations of decency that occur in society, especially the practice of prostitution or prostitution where almost all people carry out this activity, ironically even children are involved in this prostitution network.⁶

The practice of prostitution is a form of social deviation committed by society since ancient times until now. The results of the author's interview with the police regarding prostitution show that prostitution has developed into a livelihood

¹ Lisnawaty W. Badu And Ahmad. "Purifikasi Pemberian Amnesti Dan Abolisi: Suatu Ikhtiar Penyempurnaan Undang Undang Dasar 1945." *Jurnal Ius Civile*. 5 No. 2 (2021): 93-111., 104

² Novendri M. Nggilu, "Tinjauan Yuridis Pengaturan Sanksi Pidana Dalam Peraturan Daerah Provinsi Gorontalo," *Lambung Mangkurat Law Journal*. 5, No. 2 (2020): 109-121., 110

³ Mohamad Hidayat Muhtar, "Model Politik Hukum Pemberantasan Korupsi Di Indonesia Dalam Rangka Harmonisasi Lembaga Penegak Hukum." *Jambura Law Review*. 1, No. 1 (2019): 68-93., 73

⁴ Mellisa Towadi and Nur Mohamad Kasim, "An Indication of China ' s Policy towards Uighurs and Its Implications by International Law Aspects." *Jambura Law Review*. 3, No. 01 (2021): 55-71., 69

⁵ Dian Ekawaty Ismail and Mohamad Taufiq Zulfikar Sarson, "Criminology Analysis of Women's as Perpetrators of Domestic Violence Crimes," *Jambura Law Review* 3, No. 1 (2021): 57-76., 58

⁶ Emiel Salim Siregar Samsir, Bahmid, "Strategi Dan Kebijakan Penanganan Psk Di Polsek Datuk Bandar Kota Tanjungbalai." *Jurnal Pionir* 6, No. 1 (2020): 120-126., 120

system that is inconsistent with the Pancasila philosophy and the 1945 Constitution of the Republic of Indonesia (hereinafter referred to as the 1945 Constitution of the Republic of Indonesia).⁷As the data obtained shows that from 2017 cases have fluctuated, meaning that from year to year cases of commercial sex workers continue to occur. The following data was obtained from the Gorontalo Provincial Dinas Sosial Gorontalo as of October 2021:

Table 1

Data on the Number of Commercial Sex Workers in Gorontalo City

No	Year	Number of Cases
1	2017	53
2	2018	40
3	2019	58
4	2020	64
5	2021	45
Amount	Case	260

Source: Dinsos Gorontalo Province, 2021

Seeing the development of commercial sex worker case data in the table above gives an understanding that from year to year cases of CSWs do not settle or the cases fluctuate and looking at the 2021 cases as of October 2021 there were 45 cases, so by looking at the data above it can give one view that the cases will increase even more if law enforcement is not increased again.

According to the author, law enforcers can be said to be justice enforcement agencies in a society, institutions where people need and seek justice. The Gorontalo City Police is one of the law enforcement agencies where the main duties of the Polres are in accordance with Law Number 2 of 2002 on the Indonesian National Police, including maintaining security and public order, upholding the law, and providing protection, protection and service to the community. Legal protection is needed because of efforts to integrate various needs in associations so that there are no conflicts between needs and can enjoy all the rights granted by law.⁸ The state is firmly obliged to strive to fulfill the rights of every citizen through various institutions, one of which is law enforcement.⁹ Where one of his duties is to create legal certainty because it aims

⁷Result of an interview with Laode Arwansyah as head of the Criminal Investigation Unit of The Gorontalo City Police. at 10:15 a.m December 15 2020"

⁸ Jufryanto Puluhulawa, Mellisa Towadi, and Vifi Swarianata, "Perlindungan Hukum Situs Bawah Air Leato / Japanese Cargo Wreck The Legal Protection of The Leato Underwater Site" *Jurnal Reformasi Hukum* 24. No. 2 (2020): 189-208., 197

⁹ Julius Mandjo, "The Right to Obtain Free Assistance and Legal Protection for The Indigent People Through Legal Assistance Organizations." *Jambura Law Review*. 3, No. 02 (2021): 365-77., 375

to create public order. Instead, the community expects benefits in implementing or enforcing the law.¹⁰ So the authors are of the opinion that the Gorontalo City Police in handling criminal acts or crimes certainly has strategies and policies in accordance with the regulations that apply in Indonesia, including in handling commercial sex workers (PSK) in the jurisdiction of the Gorontalo Police.

The independence of each law enforcer will work optimally in their respective work environment, but along the way various problems are often found that affect the smooth running of the judicial process.¹¹ Quoting as said by Fence M. Wantu in his journal that the nature of justice is something that is assessed from one person to another, which is generally seen from the side who receives the treatment.¹² Quoting as said by Suwitno Yutye Imran that Justice serves as a guideline to distinguish between just and unjust actions. Elements from the aspect of justice can be contained in the substance.¹³

As for sources from the media, in 2021 the Gorontalo City Police have arrested 12 people involved in commercial sex work in Gorontalo City.¹⁴ Other data, Arkan Karim, as an activist who focuses on handling HIV/Aids in Gorontalo, stated that there were 65 commercial sex workers who openly practice prostitution, while 290 other commercial sex workers practice prostitution secretly.¹⁵ Furthermore, data as in Ade Rizkia Arumadani Rusdi's research shows that based on data obtained from the Gorontalo City Child Protection Commission in 2019 there were 549 active commercial sex workers.¹⁶

Prevention of prostitution is mostly done by controlling and arresting prostitutes by law enforcement officials, while male customers or users of commercial sex services are rarely and never even arrested or escape the attention of law enforcement officials. This way of controlling shows the existence of gender inequality, because there is discrimination against women. The existence of

¹⁰ Novia Rahmawati A Paruki and Ahmad, "Efektivitas Penegakan Hukum Tambang Ilegal," *Batulis Civil Law Review*. 3, No. 2 (2022): 177-186., 179

¹¹ Iriyanto Tiranda, Fenty Puluhulawa, and Johan Jasin, "Konsep Ideal Penanganan Perkara Tindak Pidana Korupsi Pungutan Liar Berdasarkan Asas Peradilan," *Jambura Law Review*. 1, No. 2 (2019): 120-143., 142

¹² Fence M. Wantu, "Kendala Hakim Dalam Menciptakan Kepastian Hukum, Keadilan, Dan Kemanfaatan Di Peradilan Perdata." *Jurnal Mimbar Hukum*. 25, No. 2 (2011): 205-218., 206

¹³ Suwitno Yutye Imran, "The Urgency of Regulation of the Ultra Qui Judicat Principle in Criminal Judgments," *Jambura Law Review*. 3, No. 2 (2021): 395-410., 398

¹⁴ Rfandi Ibrahim. "Bisnis Prostitusi Online Di Kota Gorontalo Tak Lekang Diadang PPKM.," accessed November 14, 2021, Melalui Liputan6.com

¹⁵ Benny N Joewono., "7.514 Pelanggan, Hanya Dilayani 65 PSK.," accessed November 14, 2021, Kompas.com.

¹⁶ "Results of Interview with Mrs. Riyana as Chair of the Child Protection Commission, April 22 2019 at 10:00 WITA. See Thesis. Ade Rizkia. The Role of the Police in Preventing and Overcoming the Practice of Prostitution. Faculty of Law, State University of Gorontalo."

gender inequality can make it difficult to deal with prostitution, because prostitutes are a paradigm of interaction between women and men outside of marriage. In this interaction, women are likened to those who are hired, while men (service users) are like the tenants.¹⁷

2. Method

The research method used in this paper is empirical research where the data obtained in the field means data that corresponds to real facts in the field obtained from the surrounding community.¹⁸ Furthermore, this study uses a qualitative approach and qualitative analysis techniques.

3. Measures for handling cases of commercial sex workers

Basically, commercial sex workers are another name for prostitutes, where the work is only for personal gain. The point is that he works as a prostitute or prostitution just to get money. Basically, according to researchers, commercial sex workers have damaged the existing social order in society. In addition, the practice of prostitution of commercial sex workers (PSK) is an activity that violates or is not in accordance with the norms and values that exist in society. Prostitution occurs due to a lack of physical and spiritual well-being.¹⁹

According to the author, basically, from a political point of view, commercial sex workers and regulations have not been specifically regulated regarding the imposition of sanctions on the perpetrators, however, the regulations only regulate and impose sanctions on meucikari, who in this case act as managers/owners/caretakers of a group of sex workers. . However, the issuance of a regional regulation by the government can only provide control for them as perpetrators of commercial sex work and provide legal sanctions for pimps. So with that law enforcement is the process of realizing the legal desire to become a reality what is meant by legal desire here is none other than the thoughts of the legislature that is formulated in the legal regulation.

There are two elements in law enforcement, namely the human element and the social environment.²⁰ Based on a statement from the Pamong Paraja Police that:²¹

¹⁷ Samsir, Bahmid, *Op Cit.*, 122

¹⁸ Bambang Sunggono., *Metodologi Penelitian Hukum*. (Jakarta: Rajawali Pers, 2012)., 42

¹⁹ Laden Marpung., *Kejahatan Terhadap Kesusilaan Dan Masalah Revensinya*. (Jakarta: sinar Grafika, 2008)., 2

²⁰ Satjipto. Raharjo, *Masalah Penegakan Hukum*. (Bandung: Sinar Baru, 1986)., 23

²¹ "Results of an Interview with Mr. Sucipto Ayahu as Civil Service Police Junior Expert/ Investigator of Gorontalo City. Thursday, June 16 2022, 09:45 WITA"

"In Gorontalo City itself, we continue to enforce the law against people who practice prostitution on the basis of SOPs and regional regulations"

Seeing the statement above in terms of law enforcement related to commercial sex workers in the Gorontalo City which is carried out by the Civil Service Police is carried out according to Standard Operating Procedures. According to the author, in Gorontalo City, prostitution is regulated in the Gorontalo Regional Regulations, both regarding public order and prevention of immorality. Basically these two Local Government Regulation can already be used as a basis for stakeholders who have the authority to carry out countermeasures so that this process of prostitution does not occur again in the Gorontalo City in general. Therefore, the importance of the seriousness of the stakeholders to take legal action which incidentally can provide a deterrent effect to the perpetrators and the general public.

Seeing the various kinds of statements above, below will explain two law enforcement in dealing with commercial sex workers in the Gorontalo City, including:

1. Preventive Measures

Preventive handling is the action of law enforcement in terms of preventing before the action of commercial sex workers occurs. However, this does not rule out the possibility that this action can be carried out when providing guidance to parties who have violated the provisions of the applicable rules. Law enforcement in tackling commercial sex workers in Gorontalo City is carried out in the following ways:

a. Legal Counseling

Regarding law enforcement, apart from Dinas Sosial Gorontalo, it is also carried out by the Civil Service Police, based on what the investigator said that:²²

"Law enforcement carried out by the civil service police unit through the yustisia operation, includes conducting legal counseling by way of outreach to commercial sex workers in Gorontalo City."

The law enforcement process against commercial sex workers is carried out in stages through counseling for commercial sex workers in the Gorontalo City. Counseling is carried out by civil service police unit officers by providing counseling to commercial

²² "Results of an Interview with Mr. Sucipto Ayahu as Civil Service Police Junior Expert/Investigator of Gorontalo City. Thursday, June 16 2022, 09:45 WITA."

sex workers and their customers on the dangers of having free sex, diseases that can be transmitted through free sex, the negative effects of free sex.

b. Doing Patrols

In addition to carrying out legal counseling carried out by stakeholders who have authority and also other actions taken are carrying out patrols, in this case raids to places that are allegedly prone to prostitution practice activities. As for preventing the practice of commercial sex workers in the Gorontalo City, according to Dinas Sosial Gorontalo staff, namely:²³

"One of their main places is Terminal 42 Gorontalo and cafe cafes, but now it's sophisticated, so after we searched it, it's been through social media"

"To prevent acts of prostitution, Dinas Sosial Gorontalo itself cooperates with the Civil Service Police and the Gorontalo City Police to carry out patrols in the form of raids in places that are generally prone to prostitution, such as boarding houses, hotel entertainment venues"

"When we carried out the raid we also found a couple who were dating together in a boarding house, so we took them to the office to ask for information, summoned their parents and asked for a statement not to repeat their actions"²⁴

"Usually in the North Heledulaa environment, the police and Satpol PP often patrol the Kos Kosan"²⁵

According to the author, raids by combing areas prone to prostitution have basically not been able to give a deterrent effect to them as perpetrators of such acts. As a matter of fact, as of December, when the author was conducting research at the Gorontalo Provincial Dinas Sosial Gorontalo, data was obtained from 2017 to 2021, there were 260 cases recorded at the Gorontalo Provincial Dinas Sosial Gorontalo. This can provide an understanding that prosecution by means of raids on vulnerable

²³ "Results of Interview with Mrs. Endang Hulumudi as Head of Social Rehabilitation and Social Protection and Security. Tuesday, August 2 2022, 10:30 WITA"

²⁴ "Results of Interview with Mrs. Endang Hulumudi as Head of Social Rehabilitation and Social Protection and Security. Tuesday, August 2 2022, 10:30 WITA."

²⁵ "Results of an interview with Mrs. Ati as a boarding house owner in North Heledulaa, City of Gorotalo. Saturday, September 3 2022, 13:45 WITA"

places cannot be said to be effective, with this data from year to year there are cases that occur. However, as further information from Dinas Sosial Gorontalo that:

"The data includes lovers out of wedlock who were found during a raid on the boarding house by the Satpol PP and the police"

"As far as I know, there were many couples who were raided by the Satpol PP and the police together in a boarding house, so they were taken to the office for questioning"²⁶

c. Give a warning

After the socialization carried out by the civil service police unit apparatus regarding the impact of prostitution, a warning was given to commercial sex workers. This is based on what was said by the Head of Social Rehabilitation and Social Protection and Security that:²⁷

"One of our actions is also for commercial sex workers in the Gorontalo City to make a mutual agreement through making a statement not to repeat the practice of commercial sex workers again"

"This process is an attempt to warn those who engage in commercial sex in the Gorontalo City, apart from the commercial sex workers, we are following a statement letter"

Actions to prevent acts of prostitution from occurring in the community will not be effective if the perpetrators of prostitution like this are only fostered and sent home just like that. However, the presence of a regional regulation gives authority to interested stakeholders to enforce a rule from the regulation itself.

2. Repressive Measures

If you examine the sanctions against commercial sex workers through positive Indonesian rules, in this case the Criminal Code. So, in general it does not regulate what constitutes a sanction for the perpetrators, but the Criminal Code itself only regulates pimps or in this case the

²⁶ "Results of Interview with Mr. Oyi S. As a Community of Gorontalo City Saturday, September 3 2022, 11:26 WITA"

²⁷ "Results of Interview with Mrs. Endang Hulumudi as Head of Social Rehabilitation and Social Protection and Security. Tuesday, August 2 2022, 10:30 WITA."

manager/owner/caretaker of a group of sex workers regulated in Article 298 of the Criminal Code which prohibits anyone who makes livelihood or habits and taking advantage of obscene activities carried out by other people with a maximum penalty of 1 year and 4 months. In this regard, the perpetrators of commercial sex work are regulated in the Gorontalo Regional Regulation in matters related to the prevention of immorality, especially in Article 3 which regulates the prohibition for couples who are not husband and wife to live in one place.

The writer's savings are basically in terms of eradicating prostitution, especially commercial sex workers, it is very difficult to do, but this cannot be used as a benchmark for not doing anything in dealing with immoral crimes like this. With that in terms of prevention, of course, you have to take various methods, such as by cooperating with various elements of society so that even though this crime has not been stopped, at least all elements of society can be able to control this prostitution activity. The repressive actions carried out by the Civil Service Police and Dinas Sosial Gorontalo, namely by taking action in the form of coaching and inviting parents to pick up their children

a. Conduct training

Based on what became the statement from the Satpol PP investigators of the Gorontalo City that:²⁸

"We made arrests during raids, we will coordinate with Dinas Sosial Gorontalo to provide these perpetrators to be given guidance"

In line with what Dinas Sosial Gorontalo staff said that:²⁹

"Dinas Sosial Gorontalo in terms of providing guidance to PSK is carried out at Halfway Houses as places for People with Social Welfare Problems or in short PMKS, one of which is PSK, but at this time if we find that the settlement has not reached our side, even if there is one we will carry out coaching for 7 days at the Halfway House"

Explicitly, from the handling actions carried out by the Satpol PP and Dinas Sosial Gorontalo, basically they have not implemented what is contained in Regional Regulation No. 1 of 2018 related to public order and regional regulations of the province of Gorontalo

²⁸"Results of an Interview with Mr. Sucipto Ayahu as Civil Service Police Junior Expert/Investigator of Gorontalo City. Thursday, June 16 2022, 09:45 WITA."

²⁹"Results of Interview with Mrs. Endang Hulumudi as Head of Social Rehabilitation and Social Protection and Security. Tuesday, August 2 2022, 10:30 WITA."

number 10 of 2003 on the prevention of immorality. Based on a statement from Satpol PP investigators it was said that:

"For now, in terms of imposing sanctions, we have not implemented them, because we are still prioritizing settlement by mediation only and in the future we will continue to carry out the regional regulation's orders"³⁰

"Implementation of Local Government Regulation related to the prevention of immorality and public order in terms of law enforcement or handling of commercial sex workers has not been maximized"³¹

It is clear from the statement above that it can provide an understanding that from the actions taken by stakeholders, both the civil service police and Dinas Sosial Gorontalo have not implemented what is the instruction rather than the regional regulation itself. Accordingly, based on what became the statement from Dinas Sosial Gorontalo that we ourselves do not have the authority in terms of dealing with commercial sex workers because this is the authority of the Civil Service Police as the executor of the regional regulation itself.

b. Conduct Parent Invitation

Inviting parents is intended as a form of notification that their child has committed acts of prostitution outside of marriage. Therefore requested to parents so that they can supervise and control every activity of their children. based on information from Dinas Sosial Gorontalo that:³²

"If someone is caught doing something and at that time the government is conducting a raid, then our next action is to invite the parents of the couple and we will return them to be given guidance."

The handling of commercial sex workers in the Gorontalo City appears to be only of a mediation nature, in which the actions taken

³⁰"Results of an Interview with Mr. Sucipto Ayahu as Civil Service Police Junior Expert/Investigator of Gorontalo City. Thursday, June 16 2022, 09:45 WITA."

³¹"Results of Interview with Mrs. Endang Hulumudi as Head of Social Rehabilitation and Social Protection and Security. Tuesday, August 2 2022, 10:30 WITA"

³²"Results of Interview with Mrs. Endang Hulumudi as Head of Social Rehabilitation and Social Protection and Security. Tuesday, August 2 2022, 10:30 WITA"

only give social sanctions but have not yet implemented the provisions in regional regulations as safe as containing sanctions for those who commit acts of prostitution. Referring to Fence M. Wantu's opinion that a person who has committed a criminal act indirectly the perpetrator must and must be legally processed.³³ According to the author, immoral acts, in this case the case of commercial sex workers, constitute a criminal act or it can be said that it is a social disease that should be dealt with by the authorities in accordance with the applicable regulations, in this case regional regulations.

If these actions continue to be carried out without any legal sanctions being given, then basically the government is giving a signal to the public that there are no sanctions governing those who are not husband and wife committing acts that could be considered adultery from a religious perspective. In fact, if the government is serious in handling and tackling this crime of prostitution, it should carry out the implementation of regional regulations that have been made by regional governments. However, in reality, according to the author, the local regulation is not properly implemented. It is true that mediation is an easy solution to do, However, the question is whether the mediation action is an action that gives zero effect to the perpetrators and to society in general? Of course this, in the opinion of the author, has not yet had a zero effect on those who do it and those who plan to do it. Therefore, according to the author, the policies that have been made by the regional government must really be implemented in the field so that later they will have a zero effect on those who want to commit violations as stated in the regional regulations themselves.

The actions above are only social sanctions which are still concerned with humanity, which if acted upon by existing regional regulations both by regional regulations for public order and prevention of immorality, then the perpetrators of these perpetrators will be charged with articles whose contents can be imprisoned and fined with money. Prostitution as a social problem, according to the author, has several dimensions of the problem, namely prostitution as a social phenomenon and this social phenomenon has legal consequences for prostitution because society denounces or hates it. So that in controlling and preventing it basically can only be done by making and

³³ Fence M. Wantu, *Hukum Acara Pidana* (Yogyakarta: Reviva Cendekia, 2011), 13

implementing various policies in a comprehensive and systematic manner. especially if you have collaborated with many elements of society such as non-governmental organizations, community leaders, religious leaders and especially the academic community of higher education institutions to make various efforts, as is the case with socialization of the dangers of committing immoral crimes. Based on interviews with Dinas Sosial Gorontalo staff it was said that:³⁴

"We as the government certainly cannot do much and we cannot do prevention alone, but must work together with all elements of society, so that immoral practices in this community can be controlled properly"

"If there really is cooperation, if we see it and we know there is a suspicious couple, we will report it to the authorities, especially when we are alone in a boarding room."³⁵

The statement above certainly agrees with the author's idea as explained earlier. It is true that controlling a crime cannot be carried out by one agency alone, but there must be cooperation with the community. So that in carrying out prevention in the form of prosecution it will be processed quickly when there are reports from the surrounding community. It would be ironic if the regional regulations that had been made by the local government had not been implemented to catch the perpetrators of commercial sex work. Enforcement in the form of implementation of criminal provisions contained in regional regulations is certainly the next step after preventive actions and non-justice actions. The action in question is a repressive action where this action is a form of legal process for violators violating the provisions contained in regional regulations. However, sadly, based on the data obtained by the author from sources, there has been no implementation of regional regulations as the authors mentioned above.

4. Conclusion

Law Enforcement in Handling Commercial Sex Workers (PSK) in Gorontalo City is carried out in two ways, namely preventive enforcement and repressive enforcement. Preventive enforcement of course there are various steps taken to prevent the practice of prostitution, namely legal counseling, conducting patrols and giving warnings. Meanwhile, repressive enforcement is carried out in two

³⁴ " Results of Interview with Mrs. Endang Hulumudi as Head of Social Rehabilitation and Social Protection and Security. Tuesday, August 2 2022, 10:30 WITA."

³⁵"Interview Results with Pak Riko as a Gorontalo City Community Saturday, September 3, 2022, 15:17 WITA."

ways, namely coaching and inviting parents. So that from law enforcement it can be seen that there has been no implementation of the provisions of regional regulations that have been made such as the imposition of criminal sanctions, but only the imposition of social sanctions by the law enforcers themselves.

Law enforcement against commercial sex workers must be optimized one of which is to implement policies that have been made by the local government through regional regulations. The regulations that have been made are not only reading material for the public and all stakeholders who have authority, but as material to ensnare perpetrators of commercial sex work, especially in the Gorontalo City. In addition, law enforcers should increase cooperation between the public and law enforcers in terms of implementing existing policies.

References

Books

Marpung., Laden. *Kejahatan Terhadap Kesusilaan Dan Masalah Revensinya*. Jakarta: sinar Grafika, 2008.

Raharjo, Satjipto. *Masalah Penegakan Hukum*. Bandung: Sinar Baru, 1986.

Sunggono., Bambang. *Metodologi Penelitian Hukum*. Jakarta: Rajawali Pers, 2012.

Wantu, Fence M. *Hukum Acara Pidana*. Yokyakarta: Reviva Cendekia, 2011.

Journals

Ibrahim., Rfandi. "Bisnis Prostitusi Online Di Kota Gorontalo Tak Lekang Diadang PPKM." Accessed November 14, 2021. Melalui Liputan6.com.

Imran, Suwitno Yutye. "The Urgency of Regulation of the Ultra Qui Judicat Principle in Criminal Judgments." *Jambura Law Review*. 3, No. 2 (2021): 395-410.

Ismail, Dian Ekawaty, and Mohamad Taufiq Zulfikar Sarson. "Criminology Analysis of Women's as Perpetrators of Domestic Violence Crimes." *Jambura Law Review*. 3, No. 1 (2021): 57-76.

Lisnawaty W. Badu And Ahmad. "Purifikasi Pemberian Amnesti Dan Abolisi: Suatu Ikhtiar Penyempurnaan Undang Undang Dasar 1945." *Jurnal Ius Civile*. 5 No. 2 (2021): 93-111

Mandjo, Julius. "The Right to Obtain Free Assistance and Legal Protection for The Indigent People Through Legal Assistance Organizations." *Jambura Law Review*. 3, No. 02 (2021): 365-377.

- Muhtar, Mohamad Hidayat. "Model Politik Hukum Pemberantasan Korupsi Di Indonesia Dalam Rangka Harmonisasi Lembaga Penegak Hukum." *Jambura Law Review* 1, No. 1 (2019): 68-93.
- Nggilu, Novendri M. "Tinjauan Yuridis Pengaturan Sanksi Pidana Dalam Peraturan Daerah Provinsi Gorontalo." *Lambung Mangkurat Law Journal*. 5, No. 2 (2020): 109-21.
- Novia Rahmawati A Paruki and Ahmad, "Efektivitas Penegakan Hukum Tambang Ilegal," *Batulis Civil Law Review*. 3, No. 2 (2022): 177-186
- Puluhulawa, Jufryanto, Mellisa Towadi, and Vifi Swarianata. "Perlindungan Hukum Situs Bawah Air Leato / Japanese Cargo Wreck The Legal Protection of The Leato Underwater Site" *Jurnal Reformasi Hukum*. 24, No. 2 (2020): 189-208.
- Samsir, Bahmid, Emiel Salim Siregar. "Strategi Dan Kebijakan Penanganan Psk Di Polsek Datuk Bandar Kota Tanjungbalai." *Jurnal Pionir* 6, No. 1 (2020): 120-26.
- Tiranda, Iriyanto, Fenty Puluhulawa, and Johan Jasin. "Konsep Ideal Penanganan Perkara Tindak Pidana Korupsi Pungutan Liar Berdasarkan Asas Peradilan." *Jambura Law Review* 1, no. 2 (2019): 120-43.
- Towadi, Mellisa, and Nur Mohamad Kasim. "An Indication of China ' s Policy towards Uighurs and Its Implications by International Law Aspects." *Jambura Law Review*. 3, No. 01 (2021): 55-71.
- Wantu. Fence, M. "Kendala Hakim Dalam Menciptakan Kepastian Hukum, Keadilan, Dan Kemanfaatan Di Peradilan Local Government Regulationta" *Jurnal Mimbar Hukum*. 25, No. 2 (2011): 205-18.