

# The Effects of Decision Number: 15/PUU-XIX/2021 of the Constitutional Court on Indonesia's Money Laundering Law Enforcement

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## ABSTRACT

Due to the discrepancy between the requirements of Article 74 of Law Number 8 of 2010 concerning the Prevention and Eradication of the Crime of Money Laundering, Civil Servant Investigators have not been able to investigate money laundering crimes, such as those in the environmental, forestry, and marine sectors. This decision of the Constitutional Court Number 15/PUU-XIX/2021 has opened up opportunities for predicate crime investigators to investigate money laundering crimes. This study's goal is to analyze how the Constitutional Court's ruling may affect future law enforcement efforts to combat the crime of money laundering. The normative research method was used in this study, with a statutory, conceptual, and case approach. The study's findings indicate that by broadening the definition of investigator in Article 74 of the Money Laundering Law, it is envisaged that it will lead to more productive outcomes in the fight against money laundering, particularly in terms of implementing a criminal handling system based on the principles of simplicity, speed, and low cost.

**Keywords:** constitutional court decisions, implications, law enforcement, money laundering.

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## I. INTRODUCTION

On the one hand, the advancement of science, technology, and information also has negative effects in addition to beneficial ones. As an illustration, consider how criminal activity evolved from traditional crimes to organized and international ones (Hamdani, 2021, p. 212). Even in the modern period, the development of illegal acts leads to economic gain, also known as criminal acts with economic reasons, such as corruption, money laundering (TPPU), and drugs trafficking (Fauzia & Hamdani, 2021, p. 58).

In the midst of the complex development of current criminal acts, such as money laundering, a more progressive law enforcement paradigm is needed. Because the money laundering offenses case is one of the financial crimes that is still a concern in Indonesia and is continually evolving (Fauzia & Hamdani, 2021, p. 507). In Satjipto Rahardjo's view, the idea of progressive law departs from concerns over the reality of law in Indonesia which tends to take place "unfairly" and is only held hostage to formal-procedural mechanisms (S. Rahardjo in Wahid, 2021, p. 7). Therefore, progressive law is a guiding spirit that needs to be promoted in law enforcement efforts in Indonesia, especially in handling money laundering offenses.

By approving a judicial review request on the clarification of Article 74 of Law No. 8 of 2010 for the Prevention and Eradication of the Crime of Money Laundering (Law on Money Laundering), the Constitutional Court demonstrated legal progress. Because the court review application's approval will give guidance for the enforcement of the money laundering offenses statute, which is consistent with the message that efficiency is essential as well as in the context of accomplishing a straightforward, quick, and inexpensive trial. Because of the discrepancy between the requirements of Article 74 of the Money Laundering Law and its explanation, Civil Servant Investigators (PPNS) have not been able to investigate money laundering crimes, such as those in the environmental sector, forestry, and marine affairs. This has led to opportunities for predicate crime investigators to investigate money laundering crimes (Muamar, 2021).

In accordance with Article 74 of the Money Laundering Law, "Investigators of predicate crimes undertake inquiries into criminal acts of money laundering in accordance with the terms of the procedural law and the provisions of laws and regulations, unless this legislation provides otherwise."

While this is going on, the following is stated in the Elucidation of Article 74 of the Money Laundering Law:

*“Those who work for the Indonesian Ministry of Finance, the State Police, the Attorney General’s Office, the National Narcotics Agency (BNN), the Corruption Eradication Commission (KPK), the Directorate General of Taxes, and the Directorate General of Customs and Excise are considered “predicate criminal investigators.” When conducting investigations into predicate crimes in accordance with their authority, investigators of predicate crimes may conduct investigations into criminal acts of money laundering if they discover adequate preliminary evidence of the crime’s existence.”*

If refer to the provisions of Article 74 above, it is interpreted that if an investigator of a ministry or institution carries out an investigation of a money laundering crime, it is carried out by an investigator of a predicate crime. For example, PPNS Environment and Forestry (LHK) conducts investigations into criminal acts of land fires and it is suspected that money laundering is involved, this is carried out by PPNS LHK. The Police, Attorney General’s Office, KPK, BNN, Director General of Taxes, and Director General of Customs and Excise are the institutions with the authority to investigate the crime of money laundering; however, this cannot be done due to the explanation of Article 74 of the Law on Money, which restricts these institutions.

In addition, the provisions of Article 2 of Law Number 8 of 2010 (1) states that:

*“Assets derived from a criminal conduct constitute the proceeds of a crime: a). Corruption; b). Bribery; c). Drug use; d). Psychoactive; e). Smuggling of workers; f). Smuggling of migrants; g). Inside the financial industry; h). In the area of capital markets; i). In the insurance industry; j). Customs; k). Excise taxes; l). Person trafficking; m). Unlawful commerce in weapons; n). Violence; o). Kidnapping; p). Stealing; q. theft of money; r). Theft; s). Falsifying currency; t). U.S. gambling; u). Prostitution; v). In relation to taxes; w). Within the forestry industry; x). In the area of the environment; y). Fisheries and the marine environment; or z). Other offenses that carry a minimum 4-year prison sentence, which are likewise considered criminal crimes under Indonesian law whether they are carried out within the Unitary State of the Republic of Indonesia or outside its borders.”*

All categories of predicate offences that are suspected of involving money laundering can be looked into based on the provisions of Articles 2 and 74 above. As a result, restricting the ability to look into the crime of money laundering as described in the clarification of Article 74 actually works against the purpose for which this Law was originally created. In order to avoid being interpreted as “What is meant by “predicate crime investigators” is an official or agency that is authorized by laws and regulations to carry out an investigation,” the Constitutional Court’s decision that it is conditionally unconstitutional by stating that the explanation of Article 74 does not have binding legal force as long as it is not interpreted.

Thus, with respect to the description above, the author is interested in examining the existing problems by raising the title “Implications of the Constitutional Court Decision No. 15/PUU-XIX/2021 for Money Laundering Law Enforcement in Indonesia.”

## II. METHOD

A normative methodology is used in this investigation. Finding a law, legal principles, and legal doctrines to address the legal issues at hand is the process of normative legal study (Hamdani, 2021, p. 41). The statutory, conceptual, and case approach is the methodology employed in this study. Examining connected laws including the Criminal Code (KUHP), Criminal Procedure Code (KUHAP), and Law on Money Laundering is how this research approaches law. As for the conceptual aspect, the author examines the concepts in law enforcement, especially law enforcement against money laundering offenses cases. While the case approach is carried out by examining several cases of money laundering offenses that are relevant to this research.

## III. IMPLICATIONS OF THE CONSTITUTIONAL COURT’S DECISION NUMBER 15/PUU-XIX/2021 FOR LAW ENFORCEMENT OF MONEY LAUNDERING IN INDONESIA

The ruling of the Constitutional Court has repercussions for the expansion of money laundering law enforcement, which is now multi-investigator (Rizki, 2021). Previously, only six institutions had the authority to investigate money laundering offenses: the Indonesian National Police, the Prosecutor’s Office,

KPK, BNN, the Directorate General of Taxes, and the Directorate General of Customs and Excise, Ministry of Finance of the Republic of Indonesia. This decision has changed the situation. Previously, other PPNS such as PPNS at the Ministry of LHK and PPNS at the Ministry of Maritime Affairs and Fisheries (KKP) were not allowed to conduct investigations.

So that when there is a finding of an alleged money laundering offense related to the predicate crime that is being investigated, it must be submitted to the investigator at the police or another investigator who is authorized to split the case. Conditions that have made law on money laundering enforcement so far feel slow and less than optimal (Hairi, 2021, p. 171). After the Constitutional Court's decision, all investigators of predicate crimes within the scope of their authority can now conduct money laundering investigations based on the law. Note that the results of the predicate crime are as referred to in Article 2 of the Law on Money Laundering.

In this instance, PPNS are investigators who have a position and a crucial role in carrying out investigations regarding upholding criminal law, in addition to POLRI investigators. The PPNS has the power to conduct investigations based on the law, which serves as the legal foundation. As a result, the scope of the inquiry is only permitted to cover criminal activities covered by the law (Mulyadi, 2008).

The provisions of Article 1 paragraph (1) of the Criminal Procedure Code, which state that investigators are Indonesian state police officers or specific civil servants who are granted special authority by law to conduct investigations, provide insight into the position and existence of PPNS in the criminal justice system. Additionally, it can be found in the provisions of Article 1 Number 11 of Law Number 2 of 2002 Concerning the Police (Police Law), which states that "Civil Servant Investigators are civil servant officials who are appointed as investigators based on statutory regulations and have the ability to conduct criminal investigations within the extent of each statute that serves as the legal basis for each." For instance, Article 89 of Law Number 15 of 2001 concerning Marks (Mark Law) confirms that specific civil servant officials in the Directorate General of Intellectual Property Rights are granted special authority as investigators as described in the KUHAP, to conduct criminal investigations in the field of Brand.

So that with the expansion of the investigators authorized to conduct money laundering investigations, it is hoped that they will be able to provide optimization in eradicating money laundering offences. This is due to the fact that money laundering has a terrible adverse effect on the global economy and financial system, including a negative influence on the efficient use of resources and finances. Money laundering involves the use of numerous resources and monies for immoral acts that may harm the community, as well as the inefficient use of numerous dollars. This is due to the fact that, despite the lower yield, the majority of the profits of crime are invested in nations that are considered safe for money laundering. A nation with a strong economy might send the proceeds of this crime to one with a weak one. Money laundering practices can cause instability in the international economy due to their detrimental effects on financial markets and their effect on lowering public confidence in the global financial system, and organized crime that engages in money laundering can also cause instability in national economies. Money laundering operations may also have a negative impact on sharp changes in interest and currency rates (Putra, *et al.*, 2021, p. 381).

With the various negative impacts above, optimizing law enforcement against money laundering offenses is an absolute thing to do, because Indonesia should not be a target, namely a place for money laundering efforts and make money laundering continue to thrive in Indonesia. Meanwhile, by conducting a judicial review of the Elucidation of Article 74 of the Money Laundering Law, it is an effort to strengthen the legal substance in the enforcement of the crime of money laundering. Because, as mentioned by Lawrence Friedman in his book "The Legal System: A Social Science Perspective," a legal system must be based on three major components. The three basic components are legal substance, legal structure (procurement organization and enforcement), and legal culture. Legal culture also has a key role in determining whether or not law is occasionally meaningful in national life (Lawrence Friedman in Fauzia *et al.*, 2021, pp. 12–13). So that in building a legal system that is harmonious and mutually supportive of each other, it is very important to revitalize the existing legal system, not only focusing on the structural and cultural aspects, but also on the level of legal substance.

Furthermore, the presence of Indonesia as a state of law necessitates the state's obligation in providing protection, promotion, enforcement, and fulfillment of human rights (HAM), as provided in Article 28I paragraph (4) of the Republic of Indonesia's 1945 Constitution. It's because, the characteristic of the rule of law in Indonesia is the guarantee of human rights (Fauzia & Hamdani, 2021, p. 158). It means that with the renewal of the legal substance of the enforcement of the crime of money laundering, it is expected to further optimize law enforcement against the crime of money laundering in order to protect the human rights of citizens.

Juridically, all PPNS now have a strong legal basis to investigate money laundering offenses suspected to be the result of predicate crimes in accordance with their authority. In addition to PPNS at the Directorate General of Taxes and PPNS at the Directorate General of Customs and Excise, the Ministry of Finance of the Republic of Indonesia now permits the following PPNS institutions to carry out money laundering investigations:

- 1) PPNS Ministry of LHK. Authority to look into crimes involving money laundering that stem from environmental and forestry crimes. Crimes in the forestry industry include illegal logging, mining without permits, and plantations without permission. These actions are primarily related to forest destruction and are in violation of Law Number 41 of 1999 Concerning Forestry or Law Number 18 of 2013 Concerning Prevention and Eradication of Forest Destruction (P3H). One of the most dangerous environmental crimes is B3 waste-related crime, which is governed by Law Number 32 of 2009 concerning Environmental Protection and Management (Hazardous and Toxic Materials).
- 2) Civil Servant Investigator of the Ministry of Maritime Affairs and Fisheries As one of the trident investigators in the field of fisheries, together with TNI AL officers and the police, PPNS KKP can investigate allegations of money laundering offenses related to fisheries crimes based on Law Number 31 of 2004 concerning Fisheries. Mainly related to fisheries crime, including IUU fishing. This crime is now considered a Transnational Organized Fisheries Crime (TOFC) because it is cross-border, organized/structured, and aims to gain material benefits, which of course is closely related to money laundering activities.
- 3) PPNS Immigration. Investigations related to immigration crimes can also be carried out directly by the PPNS Immigration, as regulated in Law Number 6 of 2011 concerning Immigration. Crimes that have now grown from being unorganized to being organized (organized crime), such as passport and visa forgery, people smuggling and even selling babies abroad.
- 4) According to Law Number 21 of 2011 concerning the Financial Services Authority, certain PPNS whose scope of duties and responsibilities include supervision of the financial services sector within the OJK may also conduct ML investigations pertaining to criminal acts in the banking sector, the capital market sector, and the insurance sector.
- 5) Manpower inspectors who are given special authority as PPNS as referred to in Law Number 13 of 2003 concerning Manpower may also carry out money laundering investigations related to criminal acts in the field of manpower which the threat of criminal sanctions is more than 4 (four) years.
- 6) PPNS Plantation. The Plantation PPNS may also conduct money laundering investigations relating to criminal offenses in the plantation sector as stipulated by Law Number 18 of 2004 respecting Plantations.

Additionally, the Constitutional Court's interpretation of the Criminal Procedure Code's Article 1 paragraph (1), which defines investigators as "state police officers of the Republic of Indonesia (Police Investigators) or certain PPNS who are given special authority by law to conduct investigations," states that investigators of predicate crimes include all PPNS, it also implies that all PPNS have the same duties and investigative powers as other money laundering offenses investigators as regulated in the Money Laundering Law. These include the power to coordinate with PPATK, the filing of audit reports by the Financial Transaction Reports and Analysis Center (PPATK), and information requests to PPATK.

All investigators of predicate crimes, including PPNS, can now receive reports on the results of PPATK examinations. According to Article 64 of the PPTPPU Law, PPATK is required to investigate any financial transactions that seem questionable in order to look for signs of money laundering or other illegal activity. Additionally, this provision says that if evidence of money laundering or other criminal activity is discovered, the PPATK will submit the results of its examination to the investigator for investigation. Then it is also regulated that in carrying out the investigation, investigators coordinate with PPATK.

In the situation prior to the Constitutional Court's decision, the PPATK only submitted the results of the examination (HP) to the police investigators and the prosecutor's office, and copies were submitted to 4 other predicate criminal investigators (as referred to in the explanation of Article 74 of the Anti-Money Laundering Law), specifically BNN, KPK, the Ministry of Finance's Directorate General of Taxes, and the Directorate General of Customs and Excise (note the explanation of Article 64 of the Money Laundering Law). While certain other PPNS cannot receive HP from PPATK, even just a copy, and of course also cannot coordinate with PPATK (Hairi, 2021, p. 173).

All predicate criminal investigators according to their authority, including PPNS, are now also authorized to order the blocking of accounts or assets suspected of being the result of the original crime. According to money laundering Article 71 Paragraph 1: "Investigators, public prosecutors, or judges are empowered to order the Reporting Party to prevent Assets that are known or reasonably suspected to be the proceeds of criminal crimes from: a. investigators have been notified about every person who has been reported by PPATK; b. perhaps; or c. defendant."

Except for Polri investigators who are able to directly exchange information with PPATK, all other predicate criminal investigators, including PPNS, through their agency leaders can now also exchange information with PPATK (Priatno, 2021). As stated in Article 90 paragraph (2) of the Money Laundering Law, which basically stipulates those requests, giving and receiving of information in the exchange of information can be carried out on their own initiative or at the request of parties who can request information from PPATK. Article 90 paragraph (3) further stipulates that a request for information to PPATK is submitted in writing and signed by (among other things) the head of the agency or institution or commission

in the event that the request is submitted by an investigator, other than an investigator from the Indonesian National Police.

The issue of the smooth exchange of information between investigators of predicate crimes and PPATK is one that is felt to be an obstacle so far. The Constitutional Court's decision should have implications for accelerating money laundering investigations and will certainly reduce the high burden of money laundering offences in the police. The issue of the limited number of money laundering investigators was also acknowledged by the former Head of PPATK, Yunus Husein, by stating that the limitation of investigative authority to six institutions has not been able to overcome the crime of money laundering because the source of the risk of the predicate crime of money laundering is growing. Meanwhile, the risk of predicate crimes of money laundering can occur in various sectors such as finance, forestry and marine affairs, environment, health, pharmaceuticals to food (Rizki, 2021).

Thus, the Constitutional Court's decision can essentially be recognized as a "progressive" decision in an effort to improve the anti-money laundering regime and of course the enforcement of the money laundering offense law in general. However, in the context of how the money laundering law enforcement can be carried out effectively, of course, it is not enough just to expand the authority for money laundering investigations to become multi-investigator in nature. Efforts to increase the effectiveness of money laundering law enforcement need to be carried out more comprehensively.

Making law enforcement effective or in other terms "application of law" is not a simple thing, because there are many factors that need to be pursued to realize the goal of justice (Alfarouqi, 2015, p. 10). Even if this is indeed Indonesia's inclination, Soekanto (2004) argued that law enforcement goes beyond simply enforcing the law. The idea of law enforcement is therefore quite widespread. Additionally, there is a strong propensity to view law enforcement as the execution of court orders. If the law's enforcement or the judge's rulings truly disturb the calm in social life, these constrained opinions are weak. As a result, the primary issue with law enforcement is actually with the elements that could have an impact on it, specifically the legal component, law enforcement factor, supporting facility or facilities, community factor, and cultural factor. These five elements are interconnected because they define law enforcement at its core and serve as a yardstick for its efficiency (Soekanto, 2004, p. 8).

In the context of this discussion, which examines the implications of the Court's Decision on law on money laundering enforcement, it can be said that at least the Constitutional Court's Decision is actually a form of support for one factor in money laundering law enforcement, namely the legal factor (legal substance). As was previously said, the Constitutional Court's ruling has given investigators of money laundering offenses a pretty solid legal foundation for their responsibilities and powers. In particular, PPNS in several institutions that handle predicate crimes in accordance with their authority, the authority to investigate money laundering offenses, which was previously restricted to only 6 institutions and felt to slow down the investigation of money laundering offenses in several fields, is now no longer an obstacle.

#### IV. CONCLUSION AND RECOMMENDATIONS

##### A. Conclusion

Based on the findings and analysis, it can be said that all PPNS now have a solid legal foundation to look into money laundering charges that may be the outcome of other crimes that fall within their purview. In addition to PPNS at the Directorate General of Taxes and PPNS at the Directorate General of Customs and Excise of the Ministry of Finance of the Republic of Indonesia, other PPNS institutions that can carry out money laundering investigations are PPNS of the Ministry of LHK, Ministry of Maritime Affairs and Fisheries, Ministry of Immigration, and certain PPNS whose scope of duties and responsibilities includes supervision of the financial services sector within the Finan. The Constitutional Court's decision can essentially be recognized as a "progressive" decision in an effort to improve the anti-money laundering regime and of course the general enforcement of money laundering offences. Thus, it is hoped that through the Constitutional Court's decision, it will provide more effectiveness in the enforcement of money laundering crimes.

##### B. Recommendations

Suggestions are addressed to the legislators so that they can be more careful in compiling the explanation of the article, which is the official interpretation of the law, a mistake in this matter can cause legal uncertainty in the implementation of the article and have the potential to be tested materially in the Constitutional Court. Meanwhile, recommendations are being made for the government to assist the PPNS in carrying out its jurisdiction to investigate money laundering charges. Efforts should be made to improve the PPNS in order to raise its quantity, quality, and professionalism, so that it can carry out money laundering law enforcement more effectively. PPNS must also strengthen cooperation and coordination with other law enforcement agencies, particularly PPATK, in order to facilitate the investigation of money laundering charges.

## CONFLICT OF INTEREST

The authors affirm that there are no conflicts of interest.

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