

## CRIME OF MONEY LAUNDERING: MODE, CHALLENGES AND LAW ENFORCEMENT

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### ABSTRACT

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Money laundering is the process of processing the proceeds of crime to hide its illegal origins. The crime of money laundering has become a crime that has attracted much attention from the international community, including in Indonesia, and is always associated with organized crime and can be transnational in nature, such as crimes related to drugs, terrorism and corruption. Money laundering crimes have a very direct or indirect negative effect on the country's economy. The method used in this research uses a normative juridical research approach through the study of library materials using deductive reasoning methods. Money laundering, in the context of criminology, can be understood through the prism concept of crime proposed by Henry and Lanier. Anti-money laundering laws generally require recipients of funds to act with reasonable care in financial transactions. Indonesia has an independent institution called the Financial Transaction Reports and Analysis Center (PPATK) which has an important role in implementing policies to prevent and eradicate money laundering as well as building an anti-money laundering and anti-terrorism financing system in Indonesia. Law of the Republic of Indonesia Number 8 of 2010 regulates three types of money laundering crimes, first, active money laundering crimes, second, passive money laundering crimes, third, for those who enjoy the proceeds of money laundering crimes. Indonesia has a strong legal framework to tackle money laundering and terrorism financing and makes good use of financial information, domestic and international cooperation. Indonesia needs to focus more on improving asset recovery, risk-based supervision, and sanctions that are proportional and provide a deterrent effect. Indonesia needs to increase risk-based supervision, especially of money changers, money or value transfer services, as well as the non-financial sector, and implement sanctions that are effective and provide a deterrent effect in all sectors. Indonesia must also ensure accurate information about the true owners of all companies is available to law enforcement.

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### INTRODUCTION

Reports in the Indonesian mainstream media have recently focused a lot on the crime of money laundering. The youth's performance of cowboy stunts in front of loved ones to fulfill his self-actualization became a catalyst and has attracted the attention of the public, government and law enforcement in Indonesia. The phenomenon of self-actualization on social media then spread to the lifestyle and accounts of his family, who coincidentally are officials at the Directorate General of Taxes (Kompastv Lampung, 2023). The Corruption Eradication Commission has also named the former official from the Directorate General of

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Taxes as a suspect in the alleged crime of money laundering (TPPU-money laundering) which is a development of the criminal case of child abuse and alleged receipt of gratuities (Ernes, Yogi; detikNews, 2023); (CNN Indonesia, 2023).

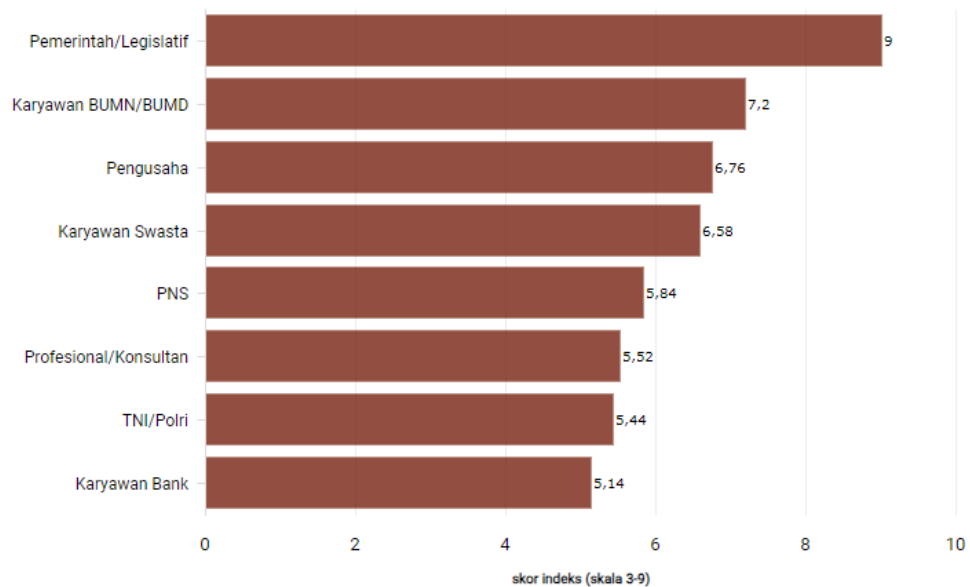
Another phenomenon is when several well-known influencers who are also affiliates of fake investment products were arrested by law enforcement officers on suspicion of committing a money laundering crime (TPPU) in 2022. Influencer Doni Salmanan was arrested on suspicion of money laundering for receiving billions of rupiah from the fraudulent investment platform Quotex, where Doni received money from his members' losses. Indra Kenz (another influencer) was named a suspect for committing fraud under the guise of investment. Meanwhile, the DNA Pro case is still being investigated by law enforcement officials who have dragged several well-known artists in Indonesia on suspicion of criminal acts of money laundering from investing in fake DNA Pro trading robots. Other cases related to TPPU include the Jiwasraya and Garuda Indonesia cases (KlikLegal.com, 2022), as well as the case of money laundering resulting from corruption in E-KTP blanks related to the procurement of blanks that violate the elements of the criminal act of money laundering (Editorial Justika, 2022).

Long before that, the international working unit working in the field of money laundering, the Financial Action Task Force (FATF) on Money Laundering, in its 2001 report published a group of countries considered vulnerable to this type of financial crime through the list of Non-cooperative Countries and Territories (NCCTs). ) (Puspapertiwi, 2016:100). The FATF report provided an assessment of thirteen countries and territories, and identified six new jurisdictions as uncooperative in combating money laundering: Egypt, Guatemala, Hungary, Indonesia, Myanmar and Nigeria (FATF, 2001:3). This report contains a brief explanation of the problems or deficiencies identified and the corrective actions that need to be taken to eliminate these deficiencies as well as positive steps that have been taken.

Ahdiat (2023) in a release on Katadata Media Network explained that according to the Financial Transaction Reports and Analysis Center (PPATK), the government and parliament (legislature) in Indonesia are most affected (prone to be involved) in money laundering practices, as stated in the Indonesia National Risk Assessment on Money Laundering 2021 published by PPATK (TEAM INTRAC, 2021). PPATK measures this money laundering risk index using quantitative and qualitative research methods. From the results of this study, PPATK compiled an index with a score on a scale of 3 to 9, with an interpretation of a score of 7.01 to 9 (high risk): Regarding money laundering of significant value, it requires urgent attention. Score 5 to 7 (medium risk): Associated with money laundering of significant value, requiring ongoing monitoring, and Score 3 to 4.99 (low risk): Associated with money laundering of low value, requiring moderate monitoring.

PPATK in its analysis found two professional groups at high risk of being involved in money laundering in 2021, namely the government and legislature, as well as employees of state-owned enterprises (BUMN)/regional-owned enterprises (BUMD). Apart from that, the study also found six medium risk professional groups, namely entrepreneurs, private employees, civil servants (PNS), members of the TNI or Polri and bank employees. Other professions that tend to participate include political party administrators, non-governmental organizations (NGOs), foundations or other legal entities, teachers, lecturers and religious figures. But overall, the risk is low. The types of high-risk criminal acts related

to money laundering in Indonesia are corruption and narcotics. Then those with medium risk are criminal acts in the fields of taxation, banking, forestry, fraud and the environment.



\* The bigger the score, the higher the risk

Graphic: Professions with a High and Medium Money Laundering Risk Index in Indonesia (2021) (Source: Katada Media Network, 2023)

Sopiah, CNBC Indonesia (2023) citing information from Tuti Wahyuningsih, Deputy for Strategy and Cooperation at PPAK, stated that since 20 years after the founding of PPAK, the practice of money laundering in Indonesia has developed from one type to five types. This development affects both the investment of criminal proceeds in the transaction layer, which further robs them of their money. First, practices using personal identity, second, practices or transactions involving family, third, practices abusing other people's identities, fourth, practices carried out across jurisdictions by taking advantage of looser overseas regulations, and fifth, practices by disguising transactions using financial technology (fintech), professional money laundering to artificial intelligence.

From a global perspective, money laundering has become a crime that has attracted much attention from the international community. This crime is always associated with organized crime and can be transnational in nature, such as crimes related to drugs, terrorism and corruption. It is not surprising, then, that the international community considers the crime of money laundering to be increasingly concerning, as large amounts of money move from one country to another, which can disrupt international economic stability.

Money laundering crimes have a very direct or indirect negative effect on the country's economy, for example a negative effect on the effective use of resources and funds. Through money laundering practices, many resources and funds are used for illegal activities and can harm society, and many funds cannot be used optimally. Because criminal money is mainly invested in countries where money laundering seems safe, although the returns are lower. The proceeds of this crime can be transferred from countries with good economies to countries with poor economies. Because it has a negative impact on financial markets and weakens citizens' trust in the international financial system, that is why the

world's countries and international organizations pay great attention to efforts to prevent and eradicate this crime.

Although countries have introduced new regulations to prevent the criminal practice of money laundering, this practice is increasing in various ways. This problem is not only influenced by people's ability to hide or disguise the results of their criminal acts through various means, such as information technology. However, this problem is also exacerbated by money laundering regulations which are not properly enforced and are often interpreted differently, making it difficult for law enforcement to prevent and take action against money laundering crimes.

## METHOD

The method used in this research uses a normative juridical research approach (normative legal research method). Normative juridical research is library legal research through the study of library materials or only secondary information (Soerjono Soekanto and Sri Mahmudji, 2003:13), with a deductive reasoning method (thinking backwards) which means conclusions from something general that has been proven to be true and the conclusion lies in its special nature (Sedarmayanti & Syarifudin Hidayat, 2011:23). Therefore, objects are analyzed using an approach called Qualitative, namely research methods related to legal standards included in statutory regulations.

## RESULT AND DISCUSSION

### Definition and Mode

International studies state that money laundering is defined as the process of processing the proceeds of crime to hide its illegal origins. For example, a drug dealer may purchase a restaurant to disguise profits from drug sales with legitimate profits from the restaurant. In this way, profits from drug sales are "laundered" through the restaurant to make it appear as though the income was earned legally. Money laundering is critical in organized crime operations because criminals will be easily detected if they are unable to "bundle" their illegal cash into, for example, legal businesses, banks, or property (Soudijn, 2014; Malm and Bichler, 2013).

This important/crucial need to hide organized crime activities is addressed through articles 6 and 7 of The Organized Crime Convention. Article 6 requires participating countries to criminalize money laundering, while article 7 refers to measures to combat money laundering (United Nations Office on Drugs and Crime, 2004: 8).

Article 6(1) of the Convention requires each participating country to criminalize money laundering. Criminalization not only allows national authorities to organize the detection, prosecution and suppression of offences, but also provides the legal basis for international cooperation among police, judicial and administrative authorities, including mutual legal assistance and extradition. The Organized Crime Convention seeks to establish uniformity in terms of intolerance towards money laundering, which serves to hide organized criminal activity.

In article 7, requirements for a comprehensive domestic regulatory and supervisory scheme for banks and non-bank financial institutions are established, as well as strong

guidelines for cooperation and exchange of information at national and international levels to investigate suspected money laundering activities.

Money laundering generally involves a series of transactions used to disguise the source of financial assets so that these assets can be used without endangering the criminals who wish to use them. The money laundering cycle can be divided into three different stages; however, it is important to remember that money laundering is a process. Money laundering stages include:

- Placement, namely moving funds from a direct connection to crime.
- Layering, namely disguising traces to thwart pursuit (the process of separating the proceeds of criminal activity from their origin through the use of layers of complex financial transactions).
- Integration, which is making money available to criminals, again, from seemingly legitimate sources (the process of using seemingly legitimate transactions to disguise the proceeds of crime. Through these processes, criminals try to convert money obtained from illicit activities being funds whose sources appear to be legal/legitimate) (United Nations Office on Drugs and Crime, 2004; John McDowell; Gary Novis, 2001).

The placement stage is the initial stage of entering the proceeds of crime into the financial system. In general, this stage has two goals: freeing criminals from holding large amounts of illegally obtained cash; and put the money into a legitimate financial system. At this stage, money launderers are most vulnerable to being caught, as placing large amounts of cash into the legitimate financial system can raise suspicion. The layering stage is performed after the placement stage and is sometimes referred to as "structuring". This is the most complex stage of money laundering and often involves the international transfer of illicit funds. The main objective of the placement stage is to separate illicit money from its source. This is done through a sophisticated process involving multiple layers of financial transactions, the ultimate goal of which is to hide audit trails and sever ties to the original criminal activity. The final stage of the money laundering process is called integration. At this stage, the money is returned to the perpetrators from a seemingly legitimate source. The proceeds of crime, which were initially placed as cash and layered through a number of financial transactions, are now fully integrated into the financial system and can be used for legitimate purposes (Adamoli, 2023).

In general, laundering money from crime in small or episodic amounts has a relatively simple process compared to laundering large amounts of money. The simplest method is used at the local or national level. One common method is to mix illegal funds with legal funds. Illegal funds are disguised as part of business income and can be claimed as legitimate business proceeds. This approach has the advantage of providing a quick explanation for money originating from illegal activities. Retail businesses such as restaurants and supermarkets, which manage large amounts of cash, are becoming popular mechanisms for this purpose.

However, when the amount of criminal proceeds is very large and requires laundering, as in the case of serious transnational fraud, local jurisdictional boundaries may prove too narrow. Especially if effective money laundering laws are in place and law enforcement authorities have extensive expertise in the investigation of economic crimes. In

such situations, criminals tend to shift their activities to jurisdictions that offer a high degree of anonymity, thereby reducing the risk of being identified and charged with criminal offenses involving profits. Therefore, they may be interested in countries that are tax havens or offshore jurisdictions, as they often have less stringent laws that provide a high degree of anonymity, or countries that have recently implemented laundering regulations money or not yet fully implementing it, so it is less effective.

In the case of transnational fraud, the first step in the money laundering process often involves the physical transfer of money overseas. The goal is to keep money away from the original crime scene. To achieve this, physical cash smuggling often proves effective. In the absence of strict controls on cross-border capital movements, criminals can still easily send the proceeds of their crimes to more profitable neighboring countries. They can use sophisticated methods such as using planes, ships, or cars, or simply by hiding money in suitcases or secret compartments. After arriving abroad, the profits are entered into the financial system. Money launderers may choose to break up large amounts of cash into smaller, less conspicuous amounts, which are then deposited in bank accounts. Or they may purchase financial instruments such as checks or money orders, which are then collected and deposited in an account at another location.

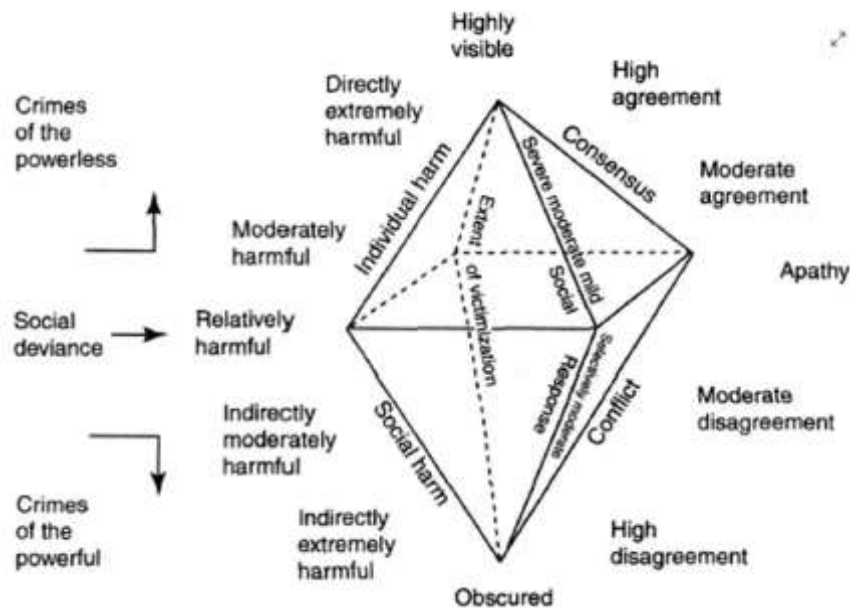
After the money has been successfully removed from the original crime location, the next stage in the money laundering process is layering. This stage involves a series of rapid and often complex transactions, aimed at obscuring the “paper trail” making it difficult for law enforcement to identify criminals or trace the origin of laundered illegal money. Money launderers may choose to channel illegal funds through investment instruments, or they may make transfers through a series of bank accounts in various countries around the world.

In the final stage of the money laundering process, namely integration, criminals attempt to return the money into the financial system legally, often by taking it back to the country where they operate and investing it in legitimate economic sectors. One sector that is often used is the real estate sector. Investing criminal proceeds in real estate properties has proven effective in the final stages of money laundering, as the properties provide criminals with the opportunity to hold investments that appear legitimate and provide a cover of legitimacy and financial stability.

## **Concepts of Crime, Law Enforcement, and Challenges**

### **Prism of Crime**

When discussing crime, it is important to consider the roles of the perpetrator, the victim, and the response/reaction of society. The definition of crime is very relative and in law it has an absolute meaning. However, individuals often narrow the definition of crime as behavior that directly and empirically harms others. Based on this view, most such behavior does fall into the category of criminal acts that harm many parties, even though the losses are indirect and may not be large. One example is the crime of money laundering which is increasingly widespread nowadays.



Source: Henry, S., & Lanier, M. M. (1998:622)

Money laundering, in the context of criminology, can be understood through the prism concept of crime proposed by Henry and Lanier (1998: 609–627). The top pyramid represents highly visible crimes, usually crimes committed by structurally powerless parties, committed in public. These include offenses such as robbery, theft, motor vehicle theft, burglary, assault, murder, rape by a stranger, and arson. These crimes are similar to many crimes that the FBI has called index crimes over the years. The lower, inverted pyramid represents relatively invisible crimes, which include a wide range of crimes committed by those in power. These are violations committed by government officials, companies, and organizations; crimes people commit through their jobs, such as fraud and embezzlement; and even some offenses such as date rape, sexual harassment, domestic violence, sexism, racism, and hate crimes. These crimes are usually committed in private settings such as organizations, workplaces, and homes, and involve violations of trusting relationships. Together powerless evil and powerful evil constitute the visible and invisible parts of the prism (Henry & Lanier, 1998:621-622).

The placement of a crime at a certain level is based on the relationship between the harm caused, the legal response, the victims, and the community's social reaction to the crime. The more factors are considered, and the stronger the influence of these factors, the criminal behavior will fall into a more serious or significant category. Conversely, if the behavior does not have a significant impact on these factors, then the crime will be at a lower level.

Even though money laundering does not have a direct impact, this activity still causes significant harm to society. However, in the context of a crime prism, money laundering often lies at a lower level. This means that money laundering tends not to receive a high priority in crime handling by the authorities. In addition, these crimes often fall into the category of "invisible crimes", where the perpetrators often have power and are difficult to see directly.

## Law Enforcement

At the international level, the problem of controlling profits from unlawful activities emerged in the late 1980s as part of the fight against drug trafficking. Between then and the end of the 20th century, three international conventions addressed this problem, first, the United Nations Convention on the Illicit Traffic in Narcotic Drugs and Psychotropic Addictive Substances of 1988, which for the first time stated that laundering the proceeds of drug trafficking could be considered a crime autonomous. Second, the Council of Europe Convention on Money Laundering, Investigation, Confiscation and Transfer of Proceeds of Crime 1990; and third, the United Nations Convention on Transnational Organized Crime of December 2000. In addition, the Financial Action Task Force (FATF), an intergovernmental body established in 1989 for the purpose of developing and promoting policies to combat money laundering, issued Forty Recommendations (40 recommendations) in 1990. These recommendations, which were subsequently revised several times, were made to prevent the proceeds of crime from being used in future criminal activities and affecting legitimate economic activities (FATF, 2003).

These various instruments establish an anti-money laundering strategy consisting of two main components: (1) increasing the effectiveness of the criminal justice system through the criminalization of money laundering and the confiscation and diversion of illegal proceeds, and (2) the implementation of a series of preventive measures that aimed at credit and financial institutions and aims to increase the transparency of financial operations. These measures include know-your-customer rules (procedures for identifying clients who open accounts or carry out financial transactions and storing related documents within a reasonable period), reporting to national authorities all transactions deemed suspicious, and cooperation between financial institutions and law enforcement agencies nationwide to make investigations more effective.

Anti-money laundering laws generally require recipients of funds to act with reasonable care in financial transactions. There have been many high-profile cases where banks have carried out international money transfers without conducting adequate reviews of the customer or the origin of the funds. Given the threat of transnational crime, corruption, and terrorism, many countries have expanded their money laundering control efforts to include other businesses that may exchange or move large amounts of cash (such as check exchange companies, money transmitters, jewelry stores, pawnshops, casinos, credit card companies, traveler's check and money order issuers) (UNODC, 2023).

In Indonesia, efforts to eradicate the crime of money laundering have been regulated since April 17 2002 with the enactment of Law Number 15 of 2002 concerning the Crime of Money Laundering. This law is the first legal regulation that regulates money laundering offenses in Indonesia. To strengthen measures to prevent and eradicate money laundering crimes, this law has undergone several changes through Law Number 25 of 2003, and then strengthened again through Law Number 8 of 2010 concerning Prevention and Eradication of Money Laundering Crimes. (Eddyono & Chandra, 2015:6).

As an additional step, Indonesia also established an independent institution called the Financial Transaction Reports and Analysis Center (PPATK). PPATK has an important role in implementing policies to prevent and eradicate money laundering as well as building anti-money laundering and anti-terrorism financing systems in Indonesia. This



institution has the authority to track and analyze financial transactions to detect indications of criminal acts of money laundering and terrorist financing. With the existence of legal regulations and institutions such as PPATK, Indonesia is committed to increasing the effectiveness of preventing and eradicating money laundering crimes and building an environment that is unfavorable for the perpetrators of these crimes.

Law of the Republic of Indonesia Number 8 of 2010 concerning Prevention and Eradication of the Crime of Money Laundering regulates three types of money laundering crimes, first, the active money laundering crime, namely every person who places, transfers, diverts, spends, pays, grants, entrusts , taking abroad, changing the form, exchanging for money or securities or other actions regarding assets which he knows or reasonably suspects are the result of criminal acts as intended in Article 2 paragraph (1) with the aim of hiding or disguising the origin of the assets. (Article 3 of Republic of Indonesia Law No. 8 of 2010). Second, the criminal act of passive money laundering which is imposed on every person who receives or controls the placement, transfer, payment, grant, donation, custody, exchange or use of assets which he knows or reasonably suspects are the proceeds of a criminal act as intended in Article 2 paragraph ( 1). This is also considered the same as money laundering. However, it is excluded for Reporting Parties who carry out reporting obligations as regulated in this law. (Article 5 of Republic of Indonesia Law No. 8 of 2010). Third, in Article 4 of Republic of Indonesia Law no. 8/2010, is also imposed on those who enjoy the proceeds of the crime of money laundering which is imposed on every person who hides or disguises the origin, source location, allocation, transfer of rights or actual ownership of assets which he knows or reasonably suspects are the results of criminal acts as intended in Article 2 paragraph (1). This is also considered the same as money laundering.

Law of the Republic of Indonesia Number 8 of 2010 also regulates the proceeds of criminal acts of money laundering as stated in Article 2, namely (1) Proceeds of criminal acts are assets obtained from criminal acts: a. corruption; b. bribery; c. narcotics; d. psychotropics; e. labor smuggling; f. migrant smuggling; g. in banking; h. in the capital markets sector; i. in the insurance sector; j. customs; k. excise; l. human trafficking; m. illicit arms trade; n. terrorism; o. kidnapping; p. theft; q. embezzlement; r. fraud; s. counterfeiting money; t. gambling; u. prostitution; v. in the field of taxation; w. in the forestry sector; x. in the environmental sector; y. in the maritime and fisheries sector; or z. other criminal acts which are punishable by imprisonment for 4 (four) years or more, which are committed in the territory of the Unitary State of the Republic of Indonesia or outside the territory of the Unitary State of the Republic of Indonesia and these criminal acts are also criminal acts according to Indonesian law. (2) Assets that are known or reasonably suspected to be used and/or used directly or indirectly for terrorist activities, terrorist organizations or individual terrorists are equated with the proceeds of criminal acts as intended in paragraph (1) letter n.

## CONCLUSION

Money laundering is a serious threat with devastating consequences for the financial system and national security. Criminals use dirty money to finance their companies with the proceeds of crime, which undermines competition between legal and illegal businesses. Although efforts have been made to combat money laundering, the international

community and countries continue to face new trends in money laundering activities that render existing measures obsolete and ineffective. Indonesia has a strong legal framework to tackle money laundering and terrorism financing and makes good use of financial information, domestic and international cooperation. Indonesia needs to focus more on improving asset recovery, risk-based supervision, and sanctions that are proportional and provide a deterrent effect. The risk of money laundering in Indonesia mainly comes from domestic crimes such as corruption, narcotics, tax crimes and crimes in the forestry sector. Indonesia also faces a high risk of terrorist financing due to the presence of terrorist organizations and their supporters within the country. FATF's evaluation of Indonesia assesses that Indonesia has a good understanding of the risks it faces and has developed risk-based policies and strategies to reduce them. This includes strong domestic interagency coordination and cooperation. Indonesia has also achieved good results in international cooperation, especially in informal cooperation in terrorism cases which require quick handling. Indonesia needs to increase risk-based supervision, especially of money changers, money or value transfer services, as well as the non-financial sector, and impose sanctions that are effective and provide a deterrent effect in all sectors. Indonesia must also ensure accurate information about the true owners of all companies is available to law enforcement.

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