



Asset Return in Money Laundering

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Abstract

Money Laundering Crime as a further criminal act has placed and involved two main perpetrators, namely active actors as parties trying to hide or disguise the origin of assets that are the result of criminal acts in various ways, and passive actors as parties who receive Money Laundering Crime assets. The return of Money Laundering Crime assets is not only through coercive measures, but also requires a voluntary return by the receiving party. In practice, voluntary returns create uncertainty when the receiving party (passive actor) from the beginning does not know the origin of the assets received. Through various money laundering cases in Indonesia in June-July 2022, the Authors are very interested in analyzing the extent of obligations related to the return of Money Laundering Crime assets. This research uses normative juridical methodology with Law approach and concept approach. The purpose of this study is to determine the obligations that must be carried out by passive trafficking actors based on Law No. 8 of 2010.

A. Introduction

The development of technology has brought such a big impact on people's lives, not only the positive impact but also the negative impact with the increasingly diverse types of crimes



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that appear, including the modes and methods used by criminals to hide and obscure the origin of their illegal wealth through money laundering practices.

Money laundering (TPPU) is the *prima donna* that is most widely / dominantly used as a mode by criminals to hide / obscure assets or assets that are the proceeds of crime. Therefore, TPPU has special characteristics that are different from criminal acts in general, because the practice of trafficking does not show clear or transparent activities, so it is not surprising that trafficking is categorized as an extra ordinary crime.

According to statistical data published by the Financial Transaction Analysis Reporting Center (PPAT), during 2021 PPATK received 24,599,287 reports¹. Regarding court decisions, as of December 2021, there have been 685 court decisions related to TPPU since the enactment of the TPPU PP Law with a maximum penalty of life imprisonment and a maximum fine of IDR 32 billion².

The concept of anti-money laundering, perpetrators and proceeds of criminal acts can be known through tracing for the proceeds of the crime to be seized for the state or returned to the rightful. If the assets of criminal acts controlled by perpetrators or criminal organizations can be confiscated or confiscated, it can naturally reduce the crime rate.

Theoretically, the seizure and confiscation of assets/proceeds of crime is based on the view that no one has the right to have wealth that is not deserved.³ This is reflected in the term "crime shouldn't pay, unjust enrichment, no one benefit from his own wrong doing⁴". The universal method of confiscation and confiscation is carried out after a court decision with permanent legal force (*inkracht van gewisde*), but today to be able to optimize the prevention and eradication of the proceeds of crime is carried out based on sufficient preliminary evidence.

In practice, the return of money from trafficking crimes is not only through forced confiscation and confiscation by law enforcement officials, but also through voluntary and good faith returns made by parties suspected of receiving funds or goods/assets that are allegedly the proceeds of non-crime. The Asset recovery is critical in strengthening some key foundation of sustainable development, such as the rule of law and strong, transparent, accountable institution.⁵

Law Number 8 of 2010 concerning the Prevention and Eradication of Not Criminal Money Laundering (Law 8/2010), classifies trafficking perpetrators into 2 (two) groups, namely active actors and passive actors. The difference is, the active subject is the one who performs, while the passive one is the one who receives. People who receive this are not only limited to family, but include everyone including those who work as artists.

One of the cases that shocked the Indonesian people, was a fraud case under the guise of investment, namely the case of binary option quotex and DNA Pro. This case turned out to drag a number of names of top Indonesian artists who had received gifts of goods or funds, even artists who were used as endorsements or had collaborated with suspects, for example in asus binary option quotex, namely Atta Halilintar who returned the luxury bag brand Christian Dior, Rizky Billiar returned his wedding gift of Rp. 10 million, Reaza Arap who returned Rp. 950 million in cash, while in the case of DNA Pro, Billy Syahputra returned the money from the

¹ Laporan yang diterima oleh PPATK meliputi Laporan transaksi Keuangan Mencurigakan, Laporan Transaksi Keuangan Tunai, Laporan Pembawaan Uang Tunai, Laporan Transaksi Penyediaan barang & Jasa, Laporan Transaksi Keuangan Transfer Dana Dari/Keluar Negeri, Laporan Penundaan transaksi.

² Bulletin "Statistik Anti Pencucian Uang & Pencegahan Pendanaan terorisme", Edisi Desember 2021, ISSN 8997, PPATK, Jakarta, 2021

³ Sugeng Wahyudi. Penal Policy on Assets Recovery on Corruption Cases in Indonesia. *Journal of Indonesian Legal Studies*. 4(1). 2019. Hlm. 62.

⁴ Romly Atmasasmita, *Hukum Kejahatan Bisnis : Teori dan Praktek di Era globalisasi*, Prenada Media Group, Jakarta, 2014, Hlm. 56.

⁵ Prosper Maguchu dan Ahmad Ghazi, The Role of Civil Society Organization in Asset Recovery, *Indonesian Journal of International Law* 19(2), 2022. Hlm. 320.

sale of the car with Stefanus Richard and Rossa who had returned the money from the gig in Bali⁶. However, it is different from Choky Sitohang who categorically refuses to return money from DNA Pro on the basis of professional work.

The return of assets in the form of funds/goods allegedly involved in TPPU by a number of artists does bring a dilemma in practice and there is no common view. Of course, this has an impact on legal certainty in the return of TPPU proceeds, so legal certainty is needed here as one of the legal purposes. Departing from these problems, the focus of this study is the extent to which parties who receive assets or passive actors are obliged to return TPPU assets, including parties who receive TPPU assets based on clear legality, carried out transparently or on the basis of professional relationships. The purpose of this study is to know and understand the accountability of passive actors in returning TPPU assets.

In accordance with the characteristics of legal science that are prescriptive and applied, the type of research used is normative juridical, namely the type of research through literature study⁷. The type of research that is normative in the form of studying and analyzing legal rules, legal principles or principles, as well as legal doctrines to answer existing legal issues. The problem approach in this study uses a Conceptual Approach, and a Statute Approach. Conceptual approach is the study of expert opinions and theories from legal experts in literature as a supporting basis. In the legal approach, it is carried out by reviewing and examining the legal norms contained in statutory provisions related to the theme being discussed, namely the principle of consensualism when associated with standard contracts containing exoneration clauses.

The legal materials used in this study can be distinguished as follows:

- a. Primary legal material, which is binding legal material, is in the form of laws and regulations, in this case namely Law 8 of 2010 and other regulations related to the issues discussed in this study.
- b. Secondary legal material, which is closely related to primary legal material because it is explanatory, which can help analyze and understand primary legal material, including literature, principles, concepts, doctrines and legal science (jurisprudence).

The rare research begins with collecting legal materials (inventory) related to TPPU, followed by the classification of legal materials, and these materials are arranged systematically and finally conduct analysis to answer the problem formulation.

B. Discussion

1. Juridical Review of Money Laundering Based on Law No. 8 of 2010

Crime is taken from the Dutch *Straafbaar feit* which consists of three words, namely "*Straaf*", "*Baar*", and "*Feit*". The word "*Straaf*" has the meaning of criminal or law, the word "*Baar*" is interpreted as permissible, and the word "*Feit*" is translated as act, event, deed, and offense⁶. According to Moeljatno, the word "*Feit*" in "*strafbaar feit*" means handling, conduct or conduct. The notion of "*strafbaar feit*" is correlated with the fault of the person who committed the behavior⁸. According to Van Hammel, the definition of criminal acts includes five elements as follows:

1. "Criminally Threatened by Law

⁶ <https://nasional.kompas.com/read/2022/04/23/17035891/kasus-dna-pro-rossa-serahkan-uang-rp-172juta-ke-bareskrim-polri>

⁷ Peter Mahmud Marzuki, *Penelitian Hukum*, Prenada Media Kencana, Jakarta, 2010, h. 22 ⁶ Adami Chazawi, *Pengantar Hukum Pidana Bag 1*, (Jakarta: Grafindo ,2002), Hlm. 69.

⁸ https://www.kompasiana.com/kristiantonaku7768/61af415106310e5aa82c9da3/istilah-strafbaar-feitdalam-hukum-pidana?page=1&page_images=1 diakses pada 3 Juli 2022.

2. Contrary to the law
3. There is a mistake committed by someone
4. The person is seen as responsible for his actions
5. The act committed has a punishable nature⁹

Money Laundering which in English is referred to as "Money Laundering" means "Money Laundering is a term used to describe the activities of transferring illegally obtained money through legitimate persons or accounts so that its original source cannot be traced"¹⁰. It also can be interpreted as the activity of moving money unlawfully (illegal) through a legal person or a legal account (not against the law) so that the source of the money cannot be traced.

According to Sutan Remy Sjahdeni, money laundering is a series of processes of activities carried out by a person or organization against illicit money (proceeds of crime), with the intention to "hide" or "disguise" the origin, origin of the money, from the government or authorities authorized to take action against criminal acts by mainly inserting the money into the financial system, so that the money can become halal money¹¹. The understanding conveyed by Sutan Remy is in line with the opinion of David Fraser argues "Money laundering is quite simply the process through which dirty money (proceeds of crime), is washed through clean or legitimate sources and enterprises so that the bad guys may more safely enjoy their ill gotten gains¹²". There are still many opinions from experts about the meaning of money laundering, but what we can understand together from money laundering is a series of activities to move money from crimes committed by a person or organization (criminals), to people or organizations or legal money storage accounts (not against the law), so that the money becomes "halal" money that can one day be withdrawn again by criminals, or the perpetrator of the crime benefits from the proceeds of the money. Clearly here Money laundering is a criminal act, where money originally obtained from the proceeds of crime, is "laundered" into legitimate money. There are three main steps of money laundering, namely Placement, Layering, Integration.

Placement is the first step that must be done by individuals who commit money laundering. This step consists of the entry of cash, in a money storage system, usually called a financial system. This step is very prone to detection, so to avoid detecting this pattern, the usual way to do is to break the money into several small units so as not to be suspected. In addition, there is another way of "placement", namely by placing the money into different money storage instruments, can be in the form of checks and deposits. In fact, it is not uncommon for these individuals to smuggle funds or assets resulting from criminal acts to other countries. In practice, individuals also place electronically (through E-Wallet), and use several other parties in making transactions. According to Garnasih, "Placement is the simplest stage, a step to convert money generated from criminal activity into a less suspicious form and ultimately into the network of the financial system"¹³.

The second stage is layering or in Indonesian is layering. The main purpose of layering is to keep money/funds obtained from a crime. Layering continues the flow of funds from the Placement. Individuals who do TPPU usually layer by buying assets, investing, and even opening various bank accounts in various countries. This stage is the place of tax havens. The definition of tax havens is "certain areas that provide

⁹ Roni Wiyanto, *Asas-asas Hukum Pidana Indonesia*, (Bandung: C.V. Mandar Maju, 2012), Hlm. 160

¹⁰ *Black Law Dictionary*, "Money Laundering"

¹¹ Tumiwa, Adrian Formen, "TINDAK PIDANA PENCUCIAN UANG DALAM PERSPEKTIF UNDANG-UNDANG NO 8 TAHUN 2010 TENTANG PENCEGAHAN DAN PEMBERANTASAN TINDAK PIDANA PENCUCIAN UANG", *Jurnal Lex Crimen*, Vol. 7 No. 2, 2018, Hlm. 74-80

¹² David Fraser, 1992, *Lawyer, Guns and Money Economics and Ideology and The Money Trail*, Sydney: The Law Book Company Limited, Hlm. 66

¹³ Yenti Ganarsih, 2003, *Kriminalisasi Pencucian Uang (Money Laundering)*, cet. 1, Jakarta: Program Pascasarjana Fakultas Hukum Universitas Indonesia, Hlm. 5.

facilities for holding foreign assets or investments without the obligation to pay taxes”¹⁴. In addition to the Tax Havens method, there are several other ways to layer such as transfers through offshore banking activities and transactions using shell corporations.

The last stage is Unification or Integration. Integration is an attempt to attract, and combine money that has been stocked in the layering stage. These money look legitimate (clean money) and are usually used for various types of business investment investments, which in essence money that should be haram instead becomes halal and is used as a business that is not against the law.

These three stages of money laundering are sometimes not carried out sequentially or even often separated one by one, but remember the ultimate goal of money laundering is to disguise the origin of money from crime by controlling the flow of money into a legitimate process, so that in the end these money launderers can enjoy the money legitimately.

Reviewing the positive legal rules in Indonesia regarding money laundering, the criminal act of money laundering (TPPU) is regulated in Law No. 8 of 2010 concerning the Prevention and Eradication of Money Laundering (hereinafter abbreviated as Law 8/2010). Looking at the consideration letter a of Law 8/2010 which clearly states that "Money Laundering not only threatens economic stability and financial system integrity, but can also endanger the joints of life in society, nation, and state based on Pancasila and the Constitution of the Republic of Indonesia Year 1945", it is clear here that money laundering is a criminal act that threatens the stability of the country's economy and financial system which has a harmful impact in the joints of Indonesian people's lives.

Article 1 point 1 of Law 8/2010 defines money laundering as all forms of criminal acts regulated in this law. The form of money laundering explicitly regulated in Law 8/2010 is contained in articles 3, 4, and 5 paragraph (1) of Law 8/2010 with the following contents:

- a. Article 3 of Law 8/2010: “Any person who places, transfers, transfers, spends, pays, grants, deposits, carries abroad, changes form, exchanges for currency or securities or other acts on Assets that he knows or reasonably suspects are the proceeds of crime as referred to in Article 2 paragraph (1) with the aim of concealing or disguising the origin of the Assets shall be convicted of Money Laundering with imprisonment for a maximum of 20 (twenty) years and a maximum fine of Rp10,000,000,000.00 (ten billion rupiah).”
- b. Article 4 of Law 8/2010: “Any person who conceals or disguises the origin, source, location, designation, transfer of rights, or actual ownership of Property that he knows or reasonably suspects is the result of a crime as referred to in Article 2 paragraph (1) shall be convicted of Money Laundering with a maximum imprisonment of 20 (twenty) years and a maximum fine of Rp. 5,000,000,000, 00 (five billion rupiah).”
- c. Article 5 paragraph (1) of Law 8/2010: “Any person who receives or controls the placement, transfer, payment, grant, donation, custody, exchange, or use of Property that he knows or reasonably suspects is the result of a crime as referred to in Article 2 paragraph (1) shall be punished with a maximum imprisonment of 5 (five) years and a maximum fine of Rp1,000,000,000.00 (one billion rupiah).”
 - i. The phrase reasonably expected to mean “What is meant by “reasonably foreseeable” is a condition that satisfies at least the knowledge, desire or purpose at the time of the occurrence of the Transaction known to him that implies a violation of law¹⁵”.

Referring to the formulation of articles 3, 4, and 5 paragraphs (1) certainly covers all

¹⁴ <https://sikapiuangmu.ojk.go.id/FrontEnd/CMS/Article/10470> , diakses pada 14 Juli 2022.

¹⁵ Explanation of Article 5 paragraph (1) of Law 8/2010

processes in money laundering (placement, layering, integration). Furthermore, what must be understood is that Law 8/2010 has defined its own proceeds of crime, this is regulated in Article 2 of Law 8/2010 as follows: The proceeds of crime are assets obtained from criminal acts 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 the crime is also a criminal offense according to Indonesian law, Among others:

a.	Corruption	n.	Terrorism
b.	Bribery	o.	Abduction
c.	Narkotic	p.	Theft
d.	Psychotropic	q.	Criminal Act of Embezzlement
e.	Labor Smuggling	r.	Criminal Fraud
f.	Migrant Smuggling	s.	Money Counterfeiting
g.	In Banking Sector	t.	Criminal Acts of Gambling
h.	In the field of Capital Market	u.	Prostitution
i.	In Insurance Sector	v.	Criminal Acts in the Field of Taxation
j.	Customs	w.	Criminal Acts in the Field of Forestry
k.	Excise	x.	Criminal Acts in the Environmental Sector
l.	Human Trafficking	y.	Criminal Acts in the Field of Fisheries
m.	Illicit arms trade	z.	Other crimes punishable by 4 years imprisonment or more.

Table 1.1 Explanation of Article 2 paragraph (1) Law 8/2010

In addition to the above forms of crime, if the Property that is known or reasonably suspected to be used and/or used directly or indirectly for terrorist activities, terrorist organizations, or individual terrorists is equated as the result of criminal acts as referred to in paragraph (1) letter n (Article 2 paragraph (2) Law 8/2010)

2. Legal Liability for Passive Perpetrators of Money Laundering Crimes

An ancient metaphor says, who does he is responsible, this is an ancient metaphor that underlies a person to be responsible for all actions he does. However, this trope is not explicitly written in the Indonesian Criminal Code (KUHP). A person can bear criminal responsibility in accordance with the principle of legality (article 1 paragraph (1) of the Criminal Code): “An act cannot be criminalized, except based on the strength of existing criminal legislation provisions”, a person can only be said to have criminal responsibility if there are laws and regulations governing the act. According to Utrecht, a criminal act is the existence of unlawful behavior, there is a maker who is responsible for his behavior (wrongdoing) in the sense of the word “responsible” (“strafbaarheid van de dader”)¹⁶.

The basis of criminal liability is the nature of a person's guilt. The theory / principle of error recognizes intentional error (dolus), and error due to unintentional / negligent (culpa). The principle of culpability as one of the fundamental principles in criminal law which in principle

¹⁶ E. Utrecht, Rangkaian Sari Kuliah Hukum Pidana I, Pustaka Tinta Mas, Surabaya, 1994, Hlm. 260.

states that a person cannot be convicted without guilt in himself. This principle is also known as “no crime without guilt”, “geen straf zonder schuld, nulla poena sine culpa, actus non facit reum, nisi mens sit rea”¹⁷.

Discussing more specifically about legal liability for passive trafficking actors, it must be known in advance what passive actors are. Perpetrator has the meaning of everyone who does, it can be said that the perpetrator is a cast¹⁸. Next discusses the word passive. The word passive is certainly the opposite of active. Passive means inactive, a large dictionary Indonesian defines passive with the word "receptive only". Referring to the details of the meaning of each word, passive actor means someone who plays a role but his role is not active.

More specifically, discussing passive perpetrators of money laundering crimes found in article 5 paragraph (1) of Law 8/2010, namely Everyone who receives or controls the placement, transfer, payment, grant, donation, custody, exchange, or use of Property that he knows or reasonably suspects is the result of a criminal act. There are two main elements of passive actors in money laundering, namely:

- a. Everyone who receives, dominates, etc. Property
- b. The person knows and reasonably suspects that the property is the proceeds of a criminal act

The phrase "reasonably suspected" means a condition that meets at least the knowledge, desire, or purpose at the time of the transaction that he knows that indicates a violation of law (explanation of article 5 paragraph (1) of Law 8/2010). Referring to the explanation of the article, the so-called passive recipient in TPPU is “any person who has knowledge, desire, or purpose at the time of a transaction that he knows is a violation of the law”¹⁹. Basically, a passive perpetrator knows that there are indications or suspicions that the wealth he holds is the result of crime, it could even be that the passive perpetrator already knows that it is money from crime, but he still has the intention to enjoy it. If a person is proven to be a passive perpetrator of money laundering, of course, the criminal provisions in Article 5 paragraph (1) of Law 8/2010 apply, namely a maximum prison sentence of 5 (five) years and a maximum fine of Rp. 1,000,000,000 (one billion rupiah).

Based on the description above, to answer the formulation of the problem related to the obligation to return assets by passive actors, it must be known in advance regarding when someone is categorized as fulfilling the elements as passive actors. Related to the position of the party receiving the flow of funds, it can be categorized as passive actors or people who participate in TPPU or even as a holder of money laundering criminals. Assets recovery its self has the aim to providing the developmeny of criminal acts related to state financial loses.²⁰ In Article 189 of the Criminal Procedur Code (KUHP) the judge must be sure that two pieces of evidence presented by public prosecutor in Court. Moreover, under article 75 of Act No. 8 of 2010 to start the investigation there is must be preliminary evidenced. The position of the party receiving the flow of funds cannot necessarily be categorized as passive actors and can be held criminally responsible, because it must be proven in advance regarding the element of whether between the giver and recipient of funds there is an agreement / cooperation to realize a delict, whether the cooperation has been planned in advance or cooperation carried out secretly, meaning that there is an agreement (meeting of mind) between them, then the party who

¹⁷ <https://www.hukumonline.com/berita/a/beberapa-catatan-mengenai-unsur-sengaja-dalam-hukumpidana-oleh--nefa-claudia-meliala-lt5ee99dda4a3d2?page=1> , diakses pada 15 Juli 2022

¹⁸ <https://kbbi.lektur.id/pelaku> , diakses pada 15 Juli 2022

¹⁹ Marsyahdan, Muhammad Al, Pertanggungjawaban Pidana Pelaku Pasif Dalam Tppu Dihubungkan Dengan UUNo. 8 Tahun 2010 Tentang Pencegahan Dan Pemberantasan Tindak Pidana Pencucian Uang, Fakultas Hukum UNPAS, Bandung : 2014

²⁰ Djohan Andika, Aryasari dan Amin Purawan. The Juridical Analysis of Potential Assets Recovery Using Act No. 8 of 2010 Concerning the Crime of Money Laundering. Ratio Legis Journal 1(3). 2022. Hlm. 325.

receives it can be categorized as a passive perpetrator because the person concerned here knows and is aware (knowledge and intent) that the money is the result of crime, for example A who works in one of the state-owned companies, then A is given a bonus by his boss X, this gift is X gift to A for free, but A knows that actually the money given by X is the result of bribes from contractors, but A still receives the money from X. In this case, A is said to have fulfilled the element of guilt, namely the element of knowing or reasonably suspecting and can be declared as a passive perpetrator. Unlike the case here, if A does not know that the money is bribe money from contractors, then A cannot be immediately held criminally responsible or declared a passive perpetrator.

In addition to the element of a meeting of mind between active actors and receiving parties, the following must be considered in answering questions related to criminal liability and the obligation of receiving parties to return funds suspected to be the proceeds of crime, namely:

1. If the funds received are free of charge or secretly (underline transaction) / not transparent, then the receiving party has the obligation to return the proceeds of crime. Moreover, between the giver and the recipient of funds does not have a clear legal relationship, then receives funds for free from other parties, it is appropriate to suspect that the money is the result of a criminal act. Unlike the case if the provision of funds is carried out on the basis of professional cooperation, meaning that the legal relationship between the parties is based on a clear legality and transparency such as the existence of a cooperation contract, and the value of the cooperation contract is indeed reasonable, not receiving more benefits, then those who receive here are not obliged to return funds that are suspected to be the proceeds of crime, so in the case of DNA Pro what Choky Sihotang did was not wrong. Moreover, Choky Sihotang is able to blind the basis of the legality of cooperation through agreements, and transactions carried out openly / transparently even in this case Choky Sihotang has also paid taxes to the state, so there is no obligation for third parties to return funds suspected of proceeds of crime.
2. Another thing that is referenced is a fair value or price or not. Fair value/price or not can be seen from the practice of daily habits, for example a husband who gives something to his wife out of the ordinary, especially so far the wife knows the husband's activities and income, and suddenly the husband gives something that does not match the husband's income, then here the wife "should suspect" that the property is the result of a criminal act. These legal sanctions need to be given, especially to prevent many parties from intentionally or arbitrarily receiving the proceeds of crime. The phrase "reasonably suspected" means a condition that meets at least the knowledge, desire, or purpose at the time of the occurrence of a Transaction known to him that indicates a violation of law (explanation of article 5 paragraph (1) of Law 8/2010). Referring to the explanation of the article, the so-called passive recipient in TPPU is "any person who has knowledge, desire, or purpose at the time of a transaction that he knows is a violation of the law". Basically, a passive perpetrator knows an indication or suspicion that the wealth he holds is the result of crime, it could even be that the passive perpetrator already knows that it is money from crime, but he still has the intention to enjoy it.

C. Conclusion

Based on the description and discussion above, conclusions can be drawn to answer the research question:

1. The criminal liability of third parties who receive the flow of funds can be categorized as passive perpetrators as referred to in Article 5 of Money Laundering, if it can be proven in advance whether there is cooperation between the giving parties (active perpetrators) or a meeting of mind in realizing the offense contained in the Money Laundering Acts Cek UU.

2. Regarding the refund of the funds received by a third party, there are two possibilities: the third party is obliged to return it if the funds are received free of charge/underline transaction, the legal relationship between the parties is unclear and the value/price given is not fair (out of the ordinary). However, if a third party receives a flow of funds based on a professional relationship, not free of charge, there is clear legality regarding legal relationships such as cooperation agreements and transactions are done transparently at the fair value, then the third party here is not obliged to return the funds.

D. Suggestion

The suggestions and input that can be given by the author through writing “Asset Return Obligations for Money Laundering in the Indonesian Legal System” include:

1. Even though the source of the funds is clear, the public still has to pay attention to where the source of the funds comes from before receiving the money.
2. Public must be more critical and careful about the sudden flow of money into private funds without clear sources.
3. The government through the Financial Services Authority in collaboration with Bank Indonesia must be more vigilant about suspicious flow of funds.

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