Legal Study on Evidence in Money Laundering Criminal Cases within Environmental Criminal Cases

Tonggo Sitorus[1], Rahmayanti[2], Redyanto Sidi[3]

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Corresponding Author
Tonggo Sitorus, Master of Law Study Program, Panca Budi Development University
Email: tonggositorus08@gmail.com

Abstract
Global environmental crime results in losses of IDR 1,540 trillion (FATF 2021). In Indonesia, the Financial Transaction Reports and Analysis Center (PPATK) records losses from illegal mining and logging reaching IDR 38 billion per day, while illegal fishing amounts to IDR 56 billion per year. The juridical issue revolves around the inequality of authority in investigating Money Laundering Crimes (TPPU), especially with Article 74 of the Anti-Money Laundering Law, which only grants authority to Civil Servant Investigators (PPNS) in the Directorate General of Taxation and Customs at the Ministry of Finance. Following Constitutional Court Decision No. 15/PUU-XIX/2021, investigative authority has been extended to all PPNS, including those from the Ministry of Environment and Forestry (KLHK), enabling them to investigate TPPU related to Environmental and Forestry Crimes. The research employs a normative legal method, examining legal principles and doctrines in TPPU events within environmental crimes. The Anti-Money Laundering Law implements a reversal of the burden of proof, where defendants must prove that their wealth is not derived from criminal activities. PPNS can request financial data from tax authorities based on Law No. 18/2013 and Law no. 8/2010. The application of additional penalties is regulated by various laws, including the Criminal Code, Environmental Law, Forest Destruction Law, Land and Water Conservation Law, and Anti-Money Laundering Law, involving judge's decisions, freezing business activities, revoking permits, dissolution, assets forfeiture for the state, and/or state takeover.

Keyword: Law of Evidence, Money Laundering Offense, Environmental Offense

1. INTRODUCTION

The Importance of Evidence in Criminal Law: In criminal law, evidence plays a crucial role in the trial process. Proof is the core of criminal case proceedings, as the pursuit here is for material truth (Faisal, 2001) . The Process of Proof: Proving is the effort to declare the truth of an event so that it can be rationally accepted as true (Prodjohamidjojo, 1984). In criminal cases, proving means demonstrating that a criminal event has occurred and the defendant is guilty of committing it, thus the defendant must be held accountable (Hamzah, 2010). In criminal matters, the goal is to obtain material truth through a negative evidence system as regulated in Article 183 of the Criminal Procedure Code. According to the Negative Evidence System Theory Under the Law, a judge can only impose a penalty if the evidence is limited and explicitly regulated by law and supported by the judge's conviction of its existence (Mulyadi & SH, 2023). Article 184 of the Criminal Procedure Code regulates the valid evidence in the criminal justice process, including witness statements, expert testimony, documents, indications, and defendant's statements. Over time, there has been an adaptation in evidence in environmental criminal acts as regulated in Article 96 of Law No. 32 of 2009 on Environmental Protection and Management. This regulation includes the same evidence, plus other evidence regulated in legislation (Prakasa, 2020) , showing flexibility in addressing more complex environmental crimes. The impact of money laundering criminal acts (TPPU) in the environmental and forestry sectors is significant for Indonesia, where forestry crimes are among the top five major crimes with high risk, while environmental crimes are in the seventh position based on the 2015 Indonesian Money Laundering Risk Assessment (Sena & Hamdani, 2022).

Data from the Financial Action Task Force (FATF) indicates that forestry crimes are widespread worldwide, especially in primary rainforests in Central and South America, Central and Southern Africa,

Southeast Asia, and parts of Eastern Europe. In Indonesia, forestry crimes are one of the biggest threats. According to data from the Financial Services Authority, the highest threat level to TPPU from environmental origin criminal acts is found in the regions of East Java, North Sumatra, and East Kalimantan (PPT & Finance, n.d.) .

Table 1. Environmental Threat Levels by Region

Profile	Low	Medium	High
East Java			✓
North Sumatra			✓
East Kalimantan			✓
West Kalimantan		✓	
DKI Jakarta		✓	
West Java		✓	
Aceh		✓	
Riau		✓	
South Sulawesi		✓	
Banten		✓	
Central Java		✓	
Jambi		✓	
Central Kalimantan		✓	
Papua	✓		
Bengkulu	✓		
NTB (West Nusa Tenggara)	✓		
South Sulawesi	✓		
Bangka Belitung	✓		
Riau Islands	✓		
Lampung	✓		
West Sumatra	✓		
South Kalimantan	✓		
North Sulawesi	✓		
In Yogyakarta	✓		

Source: PPT, GPA, & Finance , OJ Guide to Implementing the APU PPT Based Program Risk related Act Preliminary Crime (TPA) Environment

The data illustrates the number of regions divided into low, medium, and high environmental threat categories. From the chart, it is evident that high threat levels are present in three main regions: East Java, North Sumatra, and East Kalimantan. These areas exhibit a very high potential for environmental damage and related crimes, necessitating intensive attention and action from the government and law enforcement. On the other hand, a medium threat level was observed in ten other regions: West Kalimantan, DKI Jakarta, West Java, Aceh, Riau, South Sulawesi, Banten, Central Java, Jambi, and Central Kalimantan. Although not as severe as those in the high category, these regions still show significant potential threats. Hence, preventive efforts and enforcement need to be enhanced to avoid future threat escalation. Meanwhile, a low threat level is observed in eleven other areas: Papua, Bengkulu, NTB (West Nusa Tenggara), South Sulawesi, Bangka Belitung, Riau Islands, Lampung, West Sumatra, South Kalimantan, North Sulawesi, and DI Yogyakarta. Even though these are categorized as low, effective policy implementation and supervision are still required to maintain or reduce existing threats. This analysis highlights the need for a differentiated strategic approach for each threat category, with resource allocation and attention tailored based on the threat level in each region. Thus, appropriate actions can be taken to protect the environment and local communities from existing threats.

The inequality in handling money laundering cases poses a legal issue because, according to Article 74 of Law No. 8/2010 on Prevention and Eradication of Money Laundering, the authority to investigate money laundering is only given to the PPNS of the Directorate General of Taxes and the Directorate General of Customs and Excise at the Ministry of Finance, while other PPNS, including those from the Ministry of Environment and Forestry, do not have the same authority, creating unequal treatment (Sena & Hamdani, 2022) . However, Constitutional Court Decision No. 15/PUU-XIX/2021 expanded the investigative authority

for money laundering by declaring that the explanation of Article 74 of the Money Laundering Prevention and Eradication Act is unconstitutional if limited to six agencies. This decision grants PPNS from the Ministry of Environment and Forestry the legitimacy to investigate suspected money laundering from environmental crimes, in line with the President's strategy for a green economy. This legal development is crucial for strengthening law enforcement efforts in the environmental and forestry sectors, although significant challenges still need to be addressed in combating money laundering in this sector (Sena & Hamdani, 2022).

2. RESEARCH METHODOLOGY

The research method used is normative legal research, focusing on the examination of principles and legal doctrines related to legal events. This analysis utilizes qualitative data with primary legal materials from Law No. 32 of 2009 on Environmental Protection and Management, Law No. 8 of 2010 on the Prevention and Eradication of Money Laundering Crimes, Law No. 19 of 2004 on Forestry, and Law No. 6 of 2023 on Job Creation. This study also includes secondary legal materials from Constitutional Court and Supreme Court decisions, to analyze how laws are applied in specific cases and to evaluate the effectiveness of the implementation of laws related to environmental protection and money laundering.

3. RESULT AND DISCUSSION

Legal Proof in Money Laundering Criminal Cases

According to Moeljatno (Moeljatno, 2002), a criminal act can literally be defined as an action prohibited by a legal rule. This prohibition is usually accompanied by the threat of a specific criminal sanction for those who violate it. According to Jan Remmelink (Remmelink, 2014), a criminal offense is defined as human behavior, whether in the form of action or inaction, carried out under certain situations and conditions. This behavior is prohibited by law and threatened with criminal sanctions. Barda Nawawi Arief (Arief & Penegakan, 2008) explains that in drafting the Criminal Code, the term "criminal act" became the preferred choice. Article 11 of the CONCEPT defines a criminal act as an act of doing or not doing something, which by legislation is considered a violation and threatened with punishment. The importance of the element of unlawfulness or being contrary to the legal consciousness of the community becomes an additional requirement for an act to be considered a criminal offense. Barda Nawawi Arief (Arief & Penegakan, 2008) also asserts that every criminal act is always considered unlawful unless there is a valid justification. Thus, this definition includes normative aspects and the perspective of legal consciousness in determining whether an act can be categorized as a criminal offense. Article 189 of the Criminal Procedure Code (KUHAP) asserts that the judge must be convinced by at least two pieces of evidence presented by the public prosecutor to decide the punishment for the defendant. This aligns with Article 68 of Law No. 8 of 2010, which states that the evidence process must refer to KUHAP and other related laws, such as the Anti-Money Laundering Act and the Law on the Corruption Eradication Commission. In the context of criminal offenses, the burden of evidence lies with the public prosecutor. In money laundering cases, a reverse proof principle is applied, requiring the defendant to prove that their assets are not the result of a crime. However, the prosecutor remains responsible for proving other elements in the case (Rahmayanti, 2023) . The proof system adopted by KUHAP is a negative legal proof system, reinforced by the principle of judicial independence. Therefore, the judge needs two valid pieces of evidence and the conviction that the crime actually occurred and the defendant is guilty to impose a sentence.

Romli Atmasasmita (Atmasasmita & Atmasasmita, 1995) explains that KUHAP adopts a negative evidence system that allows judges to sentence based on two valid pieces of evidence and the conviction that the crime occurred and the defendant is guilty. This concept has evolved with the emergence of the reverse burden of proof system, which places the burden of proof on the suspect (Fahrojih, 2016) . Eddy OS Hiariej (Hiariej, 2013) adds that in the reverse evidence system, the defendant or their legal advisor must prove that the defendant is not guilty. The Anti-Money Laundering Law regulates that the defendant must prove that the assets they own are not from the proceeds of a crime, and the judge may order the defendant to do so. Article 75 of the Anti-Money Laundering Law specifies that the investigation of money laundering requires sufficient preliminary evidence, and if there is sufficient evidence related to money laundering and the predicate offense, both can be combined to maximize evidence. Constitutional Court Decision No. 77/PUU-XII/2014 and Article 69 of the Anti-Money Laundering Law state that in proving money laundering, it is not necessary to first prove the predicate offense, as money laundering is considered a standalone criminal

offense. This confirms that there is no need for a legally binding court decision for the predicate offense. However, in separating the investigation between money laundering and corruption as the predicate offense, there are still legal and non-legal obstacles. Legally, Article 69 of the Anti-Money Laundering Law states that the investigation, prosecution, and examination of money laundering are not required to first prove the predicate offense. Non-legally, investigators often have difficulty separating the investigation of money laundering and corruption, which tend to be combined to maximize evidence (Rahmayanti, 2017). Junaidi suggests that the word "must" should replace "can" in Article 69 of the Anti-Money Laundering Law to emphasize the separation of the investigation when the evidence more dominantly indicates money laundering (Junaidi et al., 2018) . Ajie Ramdan notes that the Constitutional Court's decision on money laundering is not unanimous, with a dissenting opinion stating that the assets for money laundering must come from the predicate offense (Ramdan, 2017) . Supriadi Widodo adds that the separation of the investigation between money laundering and the predicate offense depends heavily on the investigator's ability, which is still not optimal, with many recommendations from the Financial Transaction Reports and Analysis Center (PPATK) that cannot be followed up (Eddyono & Chandra, 2015). Effective law enforcement requires adequate resources, including educated and skilled manpower, good organization, and adequate equipment. The inability to meet these factors hinders law enforcement. Additionally, the public's low understanding of the law and distrust of law enforcement also pose challenges that must be overcome (Junaidi et al., 2018).

Legal Proof in Money Laundering Criminal Cases Related to Environmental Crimes

According to FATF 2021, environmental crime is one of the largest crimes worldwide, with global losses estimated at IDR 1,540 trillion. In Indonesia, the losses from illegal mining amount to IDR 38 trillion per year, illegal logging IDR 38 billion per day, and illegal fishing IDR 56 billion per year. This data is provided by the Financial Transaction Reports and Analysis Center (PPATK) as part of efforts to monitor illegal fund flows associated with environmental crimes (Wicaksono, 2022) . Before the Constitutional Court's decision, combating money laundering derived from environmental and forestry crimes was challenging, with only 5 cases successfully resolved until 2021 (Sena & Hamdani, 2022) . For example, the Sorong District Court found Labora Sitorus guilty of illegal logging and operating unauthorized fuel activities. Another case involved M. Ali Honopiah , who was proven to have laundered money from selling protected animals, and Basta Siahaan was found guilty of money laundering from unauthorized plantation activities in forests. Sena & Hamdani (Sena & Hamdani, 2022) highlight the minimal handling of money laundering from environmental and forestry crimes due to the limited authority of the Ministry of Environment and Forestry's civil servant investigators (PPNS) before the Constitutional Court Decision No. 15/PUU- XIX/2021. The Constitutional Court's decision had a positive impact, after several PPNS challenged the interpretation of Article 74 of the Anti-Money Laundering Law, which was considered contradictory. The Court declared that the explanation of Article 74 is not binding, as long as it does not solely refer to officials/agencies authorized to investigate the original crime. Thus, investigators of the original crime are also authorized to investigate money laundering (Sena & Hamdani, 2022) .

Following the Constitutional Court Decision No. 15/PUU-XIX/2021, PPNS of the Ministry of Environment and Forestry is authorized to investigate money laundering based on Law No. 8/2010. Previously, only six agencies had this authority. PPNS now has three options: 1) investigate the original crime and money laundering concurrently, 2) start with money laundering then the original crime, or 3) investigate the original crime first, then proceed with money laundering. The third option allows PPNS to pursue money laundering even if the original crime case has been concluded (Purba, 2022) . The Constitutional Court decision enables all PPNS to investigate money laundering, but they must be authorized to investigate the original crime. This decision is viewed as a progressive step to optimize the tracing and recovery of assets in money laundering cases (Hairi, 2021). Post-Constitutional Court decision, PPNS of the Ministry of Environment and Forestry should receive equivalent authority to other money laundering investigators as per the Anti-Money Laundering Law, including receiving reports from PPATK, coordinating, and requesting information. The Court's decision also opens the potential for joint investigations of the original crime by PPNS and money laundering, and grants PPNS the right to directly submit files to the Prosecutor's Office. However, the readiness of PPNS to investigate money laundering is questioned due to the differences in investigating money laundering compared to ordinary crimes, and the limitations in the authority of PPNS, thus requiring training to perform their duties professionally and with

integrity (Adwani & Sulaiman, 2020). Following the Constitutional Court decision, PPNS needs to enhance professionalism and performance in investigating money laundering (Hairi, 2021) . The Directorate General of Legal Administration now plays a crucial role in helping to improve the competence of PPNS of the Ministry of Environment and Forestry, given the need for professional and integrated law enforcement for the successful enforcement of money laundering laws. Coordination between PPNS of the Ministry of Environment and Forestry and PPATK is also very important. Additionally, it is essential to provide adequate facilities, infrastructure, and resources, including additional equipment and funds for detention, seizure, and arrest in money laundering investigations. With this support, it is hoped that PPNS can deliver the best results.

In forest destruction cases, the evidence includes the Criminal Procedure Code (KUHAP) as well as electronic information, documents, and maps. In money laundering, valid evidence includes KUHAP, electronic information, and documents. PPNS are authorized to request statements and evidence according to the law (Purba, 2022) . The investigation of environmental and forestry crimes is closely related to financial aspects, allowing PPNS to request financial data from perpetrators. The goal is to identify the proceeds of crime, the basis for money laundering investigations, track and recover assets, dismantle networks, and identify repeat offenses. PPNS can request data from the Financial Services Authority (OJK), PPATK, financial service institutions, and tax agencies, according to their legal authority (Purba, 2022) .

Table 2. Investigation of Environmental and Forestry Crimes Involving Financial Data Analysis

Law No. 18 of 2013 on the Prevention and Eradication of Forest Destruction		**Law Number 8 of 2010 concerning Prevention and Eradication Act Criminal Money laundering**	
Chapter	**Content**	**Articles**	**Content**
Article 35 paragraph (1)	For the purposes of investigation, prosecution, or examination in court, the investigator, prosecutor, or judge is authorized to request information from banks about the financial situation of the suspect or defendant.	Article 64	(1) The Financial Transaction Reports and Analysis Center (PPATK) conducts inspections of Suspicious Financial Transactions related to indications of Money Laundering or other criminal offenses. (2) In the event that indications of Money Laundering or other criminal offenses are found, PPATK submits the Inspection Results to the investigator for further investigation. (3) In conducting the investigation as referred to in paragraph (2), the investigator coordinates with PPATK.
Article 36 letter a	For the purposes of investigation, prosecution, or examination in court, the investigator, prosecutor, or judge is authorized to: a. request asset data and tax data of the suspect or defendant from the relevant unit.	Article 72 paragraph (1)	For the purposes of examination in Money Laundering criminal cases, the investigator, prosecutor, or judge is authorized to request the Reporting Party to provide written information regarding the Assets of: a. persons who have been reported by PPATK to the investigator; b. the suspect; or c. the defendant.
Article 36 letter b	For the purposes of investigation, prosecution, or examination in court, the investigator, prosecutor, or judge is authorized to: b. request assistance from the Financial Transaction Reports and Analysis Center to investigate the financial data of the suspect.		

Source: Law No. 18 of 2013 on the Prevention and Eradication of Forest Destruction and Law No. 8 of 2010 on the Prevention and Eradication of Money Laundering Crimes

The comparison between Law No. 18 of 2013 and Law no. 8 of 2010 reveals several similarities and differences in their approaches to the investigation, prosecution, and examination of cases. Both laws provide broad authority to investigators, prosecutors, or judges to access financial and asset information of suspects or defendants. However, Law No. 18 of 2013 emphasizes investigations related to forest destruction involving banks and relevant units, whereas Law No. 8 of 2010 focuses more on money laundering crimes with the Financial Transaction Reports and Analysis Center (PPATK) as the main agency conducting inspections and coordinating with investigators. Article 35 paragraph (1) and Article 36 of Law No. 18 of 2013 grant law enforcement authorities the power to request financial and asset information from various related institutions, including banks and PPATK. on the other hand, Article 64 and Article 72 of Law No. 8 of 2010 establish the central role of PPATK in examining suspicious financial transactions and providing the results to investigators. Despite differences in focus and granted authorities, both laws emphasize the importance of integrating financial information in legal processes and collaboration between various agencies to address crimes of forest destruction and money laundering. Investigators are authorized to block financial data/assets of suspects if there are indications of suspicious transactions. They can also request financial institutions to delay transactions of anyone involved in money laundering to prevent perpetrators from obscuring or splitting assets. This is regulated under Law No. 18/2013 and Law no. 8/2010. Regarding the confusion of assets in suspected environmental crime money laundering, it can be implemented to recover state losses (Rahmayanti et al., 2020) . The UNCAC and Law No. 7/2006 defines "assets" as property, and "proceeds of crime" as assets derived from crime. Other laws regulate the confidentiality of corporate assets as an additional criminal penalty. If a corporation is unable to pay a fine, it may be substituted by asset conflict. Law No. 8/2010 grants PPATK the authority to hand over the handling of assets from criminal offenses to investigators if there are no objections within 20 days. If the perpetrator is not found, investigators can request the court to decide the assets as state property or return them to the rightful owner.

Environmental crimes that cause harm can be subjected to additional penalties including imprisonment, as a form of restorative justice. Investigators-prosecutors can propose additional criminal charges to the judge, regulated in various laws, including the Criminal Code, Environmental Law, Forest Destruction Law, Conservation Law, and Anti-Money Laundering Law. Additional corporate penalties may include public announcement of the verdict, suspension of activities, revocation of licenses, dissolution, asset confiscation, or state takeover. Related to money laundering from environmental crimes, Parallel Investigation can be applied, which is a simultaneous investigation of the original crime and money laundering in one file, based on Article 3 of the Anti-Money Laundering Law. In a global perspective, money laundering is classified into several types (Yanuar, 2021) . First, Third Party Money Laundering, involving parties not involved in the original crime, shows a lack of urgency to investigate the original criminal case. Second, Self-Laundering, where the perpetrator of the original crime also conducts the laundering, suggests the possibility of simultaneously investigating the original crime with money laundering. Third, Stand Alone Money Laundering, the investigation or prosecution of money laundering without the need to prosecute the original crime, emphasizes the separation between money laundering investigations and the original crime. According to FATF, parallel investigations can only be applied to Self Laundering , where the perpetrators of the original and money laundering crimes are the same. This is because the requirement for simultaneous investigation between the original crime and money laundering only exists in Self Laundering cases. Thus, the flow of parallel investigations is ideally applied to Self Laundering , not to Third Party or Stand Alone Money Laundering.

4. CONCLUSION

Based on the above discussion, it can be concluded that the legal framework for handling money laundering from original environmental and forestry crimes shows positive changes after the Constitutional Court (MK) Decision No. 15/PUU-XIX/2021. Previously, the limited authority of Environmental and Forestry civil servant investigators (PPNS) hindered the handling of these cases. The MK decision grants investigative authority for money laundering to PPNS LHK, creating coherence in handling cases of original LHK crimes and money laundering. Flexibility in the order of investigation allows for more effective responses to cases involving environmental crimes and money laundering. The principle of reversing the burden of proof in the Anti-Money Laundering Law provides an incentive to ensure that the defendant proves that their assets do not originate from crime. The use of financial data as a tool for analysis and

monitoring by PPNS LHK is in accordance with Law No. 18/2013 and Law no. 8/2010. The application of additional penalties, which includes the judge's announcement of the verdict, the freezing of business activities, the revocation of licenses, and asset confiscation, provides a more effective way to deal with perpetrators of environmental crimes and money laundering. Thus, these measures can enhance the effectiveness and cohesiveness of law enforcement against environmental crimes involving money laundering in Indonesia.

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