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Comparative Analysis of Criminal Laws on Money Laundering in ASEAN Countries: Between Justice and Protection

Henny Saida Flora[1], Kaharuddin Syah[2], Erwin[3], Siti Avivi Nur Laila[4], Rifqi Devi Lawra[5]
[1]Fakultas Hukum, Universitas Katolik Santo Thomas Medan, Indonesia
Email: hennysaida@yahoo.com
[2]Fakultas Hukum, Universitas Muhammadiyah Palu, Indonesia
Email: movingkahar69@gmail.com
[3]Universitas Tanjungpura, Indonesia
Email: erwin@hukum.untan.ac.id
[4]UIN Sunan Ampel Surabaya, Indonesia
Email: afifinur02@gmail.com
[5]Universitas Mahaputra Muhammad Yamin, Solok, Indonesia
Email: rifqidevilawra@gmail.com

Corresponding Author: hennysaida@yahoo.com

Abstract: *Globalization brings many conveniences to the activities of the community through technological advances. Globalization also makes the borders and distances between countries invisible, so that countries in the world can be connected to one another. On the other hand, globalization has a negative impact on the world, namely the emergence of transnational crimes. One of the transnational crimes that plague different countries is money laundering. It is the act of processing the proceeds of criminal activity with the intent of concealing the source of the criminal activity or transforming the profits of criminal activity or corruption into ostensibly legal assets. Money laundering has become a transnational crime that is complicated and difficult to solve in various countries around the world. In this journal, the author uses a legal approach and comparative law method to compare the regulation of money laundering in Indonesia, Singapore and the Philippines. The results of this study will be an examination of the development of money laundering in the era of globalization and the regulation of money laundering in Indonesia, Malaysia, Singapore and the Philippines.*

Keyword: Globalization, Money Laundering, Transnational Crime, Asean

INTRODUCTION

A state of law is a state that has optimal law enforcement, upholds human rights, and guarantees that citizens have equal status before the law and that the government must uphold the law without exception. Law enforcement is one of the parameters of the success of the rule of law (Wangga, Kardono, & Wirawan 2019). The success of enforcing the law is an

important parameter in achieving the goals in a rule of law such as Indonesia (Pawestri, 2019). One of the law enforcement that is of concern in Indonesia today is the law enforcement against the crime of money laundering, or hereafter referred to as TPPU in this study.

Money laundering has become so popular in some parts of our society. According to the provisions of the law, money laundering is any act that fulfills the elements of a crime. Money laundering is a way for criminals to hide assets derived from criminal acts through various financial transactions so that the assets derived from the criminal act appear legitimate or legal (Sopacua, & Sakharina, 2018). The crime of money laundering or what is known as money laundering is a crime that aims to make the money from the main criminal act appear to be "Halal" money because it is used for certain investments or business so that it appears to be a legitimate income (Safitri, 2020). Based on this understanding, the crime of money laundering is a derivative crime of a main crime.

Crimes, namely various crimes or violations committed both by individuals and legal entities within the territorial boundaries of a country and across the territorial boundaries of other countries, are increasing, including these crimes, among others, in the form of money laundering crimes related to the involvement or generation of wealth (Amrani, 2015). Due to various increases in the main criminal activities, such as crimes of drugs, human trafficking, terrorism, excise, fraud, corruption and others, the crime of money laundering is increasingly widespread. Crimes that often occur in the crime of money laundering, which is an act of origin of the crime of corruption (Fitriyana, 2019).

With the aim of eradicating the practice of money laundering, Indonesia has enacted Act No. 15 of 2002 on the crime of money laundering, but the formulation of the acts classified as money laundering is still weak, with only 15 (15) predicate crimes (Husein, & Robert K, 2018). In its evolution, Law No. 15 of 2002 on the crime of money laundering has been refined, the formulation of acts that can be classified as money laundering has increased to 26 (twenty-six) predicate crimes, which include all criminal acts that are punishable by 4 (four) years imprisonment or more, which are criminal acts originating from money laundering can also be subjected to money laundering. Apart from the existence of interests outside the criminal law, Law No. 25 of 2003 has clearly amended and supplemented Law No. 15 of 2002 on the crime of money laundering. Subsequently, the new Law No. 8 of 2010 on the Prevention and Eradication of the Crime of Money Laundering was issued to adapt it to the development of law enforcement needs, international practices and standards (Tumiwa, 2018). This is the gap analysis of this study.The formulation of policies is expected to be able to overcome ML in Indonesia, but in reality there are still weaknesses in the formulation of actions that can be categorized as money laundering in Indonesia.

Indonesia, Malaysia, Singapore and the Philippines are neighboring countries that are in close proximity to each other, thus influencing the economic, social, political and legal aspects that have an impact between the two countries. Transnational crimes such as money laundering can develop in both countries. There is a work program at the ASEAN level to implement the "ASEAN Plan of Action to Combat Transnational Crime", including the fight against money laundering. Among other things, the plan calls for compiling national anti-money laundering laws and regulations and reviewing the criminalization of money laundering in ASEAN countries.

The number of money laundering cases in Malaysia committed by or involving Indonesian nationals continues to increase. Individuals who have assets obtained from the proceeds of crime are then brought to Malaysia and disguise the assets to such an extent that the origin of the assets is unknown, so that they appear to be legal or legitimate assets, but in the end will still be known by the Malaysian government itself because it is included in the category of predicate offense in the Malaysian state legislation, which is formulated in various forms and types of offenses. In Malaysia, the regulation of money laundering is

regulated by law, namely the Anti-Money Laundering, Anti-Terrorism Financing Proceeds of Unlawful Activities Act 2001 Law Number 613 (Wardhana, 2019).

On the basis of the above description, this research was conducted with the purpose of examining the problems of the formulation policy of the crime of money laundering in Indonesia and Malaysia, which is basically the design of the formulation policy of the crime of money laundering in Indonesia in the future. This study differs from previous studies published in national and international journals, which discuss the crime of money laundering in Indonesia and Malaysia. This research is different from previous research that has been published both nationally and internationally, which discusses the crime of money laundering or money laundering. The first research was about the proof of TPPU without the prosecution of the original crime (Halif, 2017).

In addition, the research conducted by Susato in his research titled "Interpretation of the Benefit Principle Regarding the Recovery of Assets for Victims of Money Laundering Crimes", this research discusses the decision number 195 K/PDT/2018 dated March 27, 2018. In its ruling, the panel of cassation level justices highlighted the principle of merit in overturning the previous court ruling, namely the disregard of procedural law in handling civil cases in the presence of a criminal ruling with perpetual force in the case of money laundering (Susato, 2020). Another research that also discusses the crime of money laundering was conducted by Muh. Afdal Yanuar, whose research focuses on the position of the crime of money laundering as an independent crime with a follow-up crime after the Constitutional Court decision number 90/PUU-XIII/2015 (Yanuar, 2019).

An international publication that also discusses ML has been carried out by Muhtar Hadi Wibowo in his research, which focuses on the discussion of ML that is committed by companies and their liability systems (Wibowo, 2018). Another international publication discusses the function of financial intelligence investigation by the Indonesian Financial Intelligence Unit together with participating reporters, considering the barriers and challenges to the reduction of ML/TF (Wibowo, 2018).Participating reporters, considering the barriers and challenges to the reduction of money laundering cases in Indonesia (Lukito, 2016).

METHOD

This legal research uses the normative legal research method with data using secondary data sources through literature review (Sonata, 2014). This legal writing uses a legal approach and a comparative approach (Benuf, & Azhar, 2020). The legal materials used in this legal paper are primary legal materials in the form of Law No. 8 of 2010 on the Prevention and Eradication of the Crime of Money Laundering and Law No. 613 of 2001 on the Prevention and Eradication of the Crime of Money Laundering and Terrorist Financing, and secondary legal materials in the form of books, journals, and dictionaries related to money laundering. The research specification used is descriptive analysis, namely by describing the applicable laws and regulations related to legal theory and legal implementation practices on the above issues (Soemitro, 1982), namely the formulation policy of money laundering crimes in Indonesia and Malaysia

RESULT AND DISCUSSION

Money laundering was first used in 1930, when Al Capone, one of history?s greatest criminals, used a Polish accountant, Meyer Lansky, for laundering his criminal proceeds.

The crime of money laundering has been popularly defined as the activity of moving, utilizing, or otherwise dealing with the proceeds of criminal activity, frequently by organized crime or by persons engaged in corrupt practices, drug trafficking, and other criminal activity.10 Etymologically, money laundering comes from the English words money "money" and laundering "to wash".

Money laundering is classified as a crime with an international dimension. This is because this type of crime usually involves the international financial system, so it is called a transnational crime. TOC has encouraged the countries of the world and international organizations to prevent and eradicate money laundering crimes because of the great negative impact it can have on a country's economy. Therefore, the management system of border area surveillance also plays a role in successfully tackling the problem of transnational crime through a comprehensive and integrated approach.

Due to the advancement of the globalization era in the field of technology, increasing international trade, and the very open geopolitical situation after the Cold War, the activities of TOCs have spread all over the world, including Indonesia. This illegal business organization uses the rapidly growing advances in communication, information, and transportation technology to expand its network.

It is argued that the activities of transnational criminal organizations have increased as the reach of legitimate business has expanded due to technological advances and an increasingly interdependent world economy.

The growth of global communications and information systems, as well as the development of a global financial system, provide quick and easy opportunities to expand criminal networks. Tensions caused by globalization, the global economic crisis, and political transitions, particularly in developing countries, have marginalized populations and increased the desire to join criminal enterprises that are perceived as helping to lift them out of poverty. Increased mobility between countries due to advances in transportation and communications. This is critical to the development of international criminal organizations to efficiently establish and expand their organizational reach and network.

Law Regulations in Indonesia

In Indonesia, money laundering regulation is governed by Law No. 8 of 2010 on Preventing and Eradicating Money Laundering Crimes. The number of criminal offenses committed by individuals and companies within a country's borders as well as across borders is on the rise. These crimes include corruption, bribery, narcotics, psychotropic substances, labor smuggling, migrant smuggling, human trafficking, arms trafficking, terrorism, kidnapping, theft, embezzlement, fraud, counterfeiting, and gambling, as well as various forms of economic crime. These crimes have involved or generated enormous amounts of wealth.

The wealth derived from these crimes or offenses is usually not spent or used directly by the perpetrators of the crime, because if it is used directly, it can be easily traced by law enforcement to the source of the wealth obtained, so the perpetrators of the crime usually first try to get the wealth obtained from the crime into the financial system. In this way, the source of the wealth is expected to be untraceable by law enforcement. Attempting to conceal or disguise the source of property derived from criminal activity as defined in this Act is known as laundering.

Under the Anti-Money Laundering Act, proceeds of crime are assets derived from criminal activity: Corruption, Bribery, Drugs, Psychotropic Drugs, Smuggling of Workers, Smuggling of Migrants, Banking, Capital, Insurance, Customs, Excise, Trafficking in Persons, Trafficking in Arms, Terrorism, Kidnap, Theft, Embezzlement, Fraud, Counterfeiting, Gambling, Prostitution, Taxation, Forestry, Environment, or any other crime which is punishable by imprisonment of 4 (four) years or more and which is 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 crime under Indonesian law. Money laundering can be divided into three crimes:

1 Active money launderer, i.e. any person who places, transfers, redirects, expends, disburses, transfers, transfers to a foreign country, changes, exchanges for money or

securities, or performs any other action involving assets that the person knows or has reason to believe to be proceeds of a crime under Article 2 (1), with the intent to conceal or disguise the origin of the assets, shall be punishable with a maximum penalty of 20 (twenty) years in prison and a maximum fine of Rp. 10,000,000,000.00 (ten billion rupiah). 10,000,000,000.00 (ten billion rupiah).

2 Any person who conceals or disguises origin, place of origin, distribution, transfer of title or actual ownership of assets that he/she knows or has reason to believe are proceeds of a crime referred to in Article 2 (1) shall receive a prison sentence of not more than 20years and a fine of not more than 1,000,000 rupiahs. 5,000,000,000.00 (five billion rupiah).

3 The offense of passive money laundering imposed on any person who receives or controls the placement, transfer, payment, grant, donation, deposit, exchange or use of assets that he knows or reasonably suspects to be the proceeds of an offense under Article 2(1) shall be punishable by a maximum term of imprisonment of 5 (five) years and a maximum fine of Rp. 1,000,000,000.00 (one billion rupiah). This is considered the same as committing money laundering. The Anti-Money Laundering Law states that any person inside or outside the territory of the unitary state of the Republic of Indonesia who participates in the attempt, assistance or conspiracy to commit the crime of money laundering shall be punished with the same penalty as provided in Article 3, Article 4 and Article 5.

Reporters who fulfill their reporting obligations are exempted from the provisions of Article 5(1) of the AML Law. The punishment for money laundering crimes committed by a legal entity shall be imposed on the legal entity and/or the controlling personnel of the legal entity in accordance with Articles 3, 4 and 5 of the AML Law. In addition to the provisions of Articles 2, 3, 4 and 5, there are other articles that regulate crimes related to money laundering. Other crimes related to money laundering are regulated in Articles 11, 12, 14, 15 and 16 of the Law on Prevention of Money Laundering.

Bank and non-bank financial institutions are referred to in this Law as financial service providers. A financial service provider is a provider of financial services or other financial services, such as banks, financing institutions, securities companies, investment fund managers, custodians, trustees, depository and settlement institutions, foreign exchange traders, pension funds, insurance companies and post exchanges.

Under the Money Laundering Law, financial service providers include: Banks, finance companies, insurance companies and insurance brokers, pension funds of financial institutions, securities companies, investment managers, custodians, trustees, post offices as giro service providers, foreign exchange dealers, card payment instrument providers, e-money and/or e-wallet providers, cooperatives engaged in savings and loan activities, pawnshops, companies engaged in commodity futures trading; or organizers of money transfer business activities. While other providers of goods and/or services are: real estate companies/brokers, motor vehicle dealers, dealers in precious stones and jewelry/precious metals, dealers in works of art and antiques, or auction houses.

Suspicious financial transactions according to the Anti-Money Laundering Law are

1 Financial transactions that are at variance with the service user's profile, characteristics or habitual transaction patterns;

2 Financial transactions of Service Users that are suspected to be conducted with the purpose of avoiding reporting relevant transactions that the Reporting Party is required to report according to the provisions of this Law;

3 financial transactions carried out with assets suspected to be proceeds of a criminal offense, or the reversal of such transactions.

4 Financial transactions that are required to be reported by the reporting party under the PPATK because they involve assets that are suspected to be proceeds of a criminal offense.

The Indonesian Financial Transaction Reporting and Analysis Center (INTRAC), as defined in Article 1(2) of the Anti-Money Laundering Law, is an independent institution under the President of the Republic of Indonesia, established to prevent and eradicate the crime of money laundering. By establishing the PPATK, Indonesia has fulfilled one of the forty recommendations proposed by the Financial Action Task Force on Money Laundering (FATF) to help eradicate money laundering in Indonesia.

Law Regulations in Singapore

Laundering in Singapore is regulated by the Corruption Drugs Trafficking and Other Serious Crime Act (CDSA). The CDSA imposes corporate and individual criminal liability.24 The Attorney-General (AG), in the capacity of the Attorney-General's Chambers (PP), is responsible for prosecuting money laundering offences in Singapore. The Commercial Affairs Department ("CAD"), a branch of the Singapore Police Force ("SPF"), is the primary investigating agency for money laundering offenses. Certain types of money laundering investigations also involve officers from the Central Narcotics Bureau and the Corrupt Practices Investigation Bureau. The CDSA specifically grants officers of these agencies various powers and rights to assist in money laundering investigations. A good regulatory framework is in place in the Government of Malaysia (GOM), including licensing and examination systems that are able to regulate the financial institutions.. However, if there is an unreasonable delay in the prosecution, this may be a factor that the court considers in sentencing.

Money Laundering Offences under the CDSA

1 Section 47(1) - Money laundering offences relating to criminals
2 Section 47(1)(a) - Concealing and disguising property constituting proceeds of crime
3 Section 47 (1) (b) - converting, transferring or removing property from jurisdiction
4 Section 47 (1) (c) - acquiring, possessing or using property that constitutes criminal conduct
5 Section 47 (2) & (3) - Any individual or person who has reasonable grounds to believe that any property, in whole or in part, which directly or indirectly represents another person, obtains a benefit from the person who commits section 47 (1) (a), 47 (1) (b) or 47 (1) (c).
6 Section 44 - Any person who enters into an "arrangement" to assist in money laundering
7 Section 47A - No need to link dirty money to a specific predicate offense.

The maximum penalties for offences under Sections 43, 44, 46 and 47 of the CDSA are:

a) If the person is an individual, a fine not exceeding S$500,000 or imprisonment for a term not exceeding 10 years, or both, per count; and
b) If the person is not an individual, a fine not exceeding S$1,000,000 on each count.

The resolution of criminal offences under the CDSA is generally a matter for the courts. However, following the passage of the Criminal Justice Reform Bill on March 19, 2018, certain specified crimes (including those relating to crimes under ss. 43, 44, 46 and 47 of the CDSA) may now be resolved through a deferred prosecution agreement ("DPA"). Deferred prosecution agreements become effective only after approval by the High Court, which must declare that the agreement is in the interests of justice and that its terms are fair, reasonable and proportionate. Upon such approval, the DPA must generally be published.

Law Regulations in Philipine

The Republic of the Philippines Code No. 9160 On Anti-Money Laundering Act Of 2001 regulates money laundering in the Philippines. The regulation states that the legal subjects of money laundering are persons and corporations. It is mentioned in "Rule 3.e. Proceeds of Crime:

Rule 3.f. "Proceeds" refers to the amount obtained or realized from an unlawful activity. It includes:

1 All proceeds, profits, effects, and any substantial amount realized from the unlawful activity;
2 all money, financial or economic instruments, apparatus, documents, papers or objects used in or in connection with illegal activities, as well as
3 all monies, expenses, payments, disbursements, fees, expenses, charges, accounts, refunds, and other similar items for the financing, operation, and maintenance of the unlawful activity.

Republic of the Philippines Anti-Money Laundering Act of 2001 (Republic Act No. 9160) states that "Rule 3.g. "Regulator" refers to the BSP, SEC and IC to request and obtain the assistance of government agencies having regulatory and/or licensing authority over such covered institution for the implementation and enforcement of the Anti-Money Laundering Act and these rules."

The Republic of the Philippines Code No. 9160 On Anti-Money Laundering Act Of 2001 also explains in relation to transactions namely: "Rule 3.h. "Transaction" means any act that creates rights or obligations or gives rise to a contractual or legal relationship between the parties.

Rule 4.1. Money laundering involves the unlawful process of disguising the origins of illicit proceeds to make them seem like they stem from lawful activities. This nefarious activity is perpetrated through various means, including:

1 Any person, knowing that any monetary instrument or item is, contains or relates to the proceeds of illicit activities, dealing or attempting to deal in such monetary instrument or item.
2 Whoever, knowing that a monetary instrument or property is the proceeds of illegal activities, acts or fails to act in a manner that facilitates the crime set forth in subparagraph (a).
3 Anyone who, aware that a financial instrument or item is mandated by this Act to be declared and deposited with the Anti-Money Laundering Council (AMLC), neglects to fulfill this obligation.

Rule 14.4. In cases where the perpetrator is a corporate entity, association, partnership, or any other legal body, the penalty shall be applied to the accountable officer, as applicable, who engaged in the act of the offense or knowingly allowed or neglected to prevent it.. Rule 14.4. Commission. If the offender is a legal entity, the court may suspend or revoke the license. If the offender is a foreigner, he shall, in addition to the penalties prescribed herein, be deported without further proceedings after serving the penalties prescribed herein. If the offender is a public official or employee, he shall, in addition to the penalties prescribed herein, suffer permanent or temporary absolute disqualification from holding office, as the case may be."

Rule 5.3. As directed by the AMLC and/or in exercising their supervisory and/or regulatory powers over Covered Entities under their respective laws, Regulatory Authorities may require that all suspicious activity involving covered entities be reported to the AMLC if there are reasonable grounds to believe that money laundering activities or money laundering offenses or a violation of this Act under Section 4 and Section 7(5) are being, have been or will be committed.

Administrative sanctions for failure to comply with such suspicious transaction reporting requirements may be imposed by the regulatory authorities authorized under their respective charters.

Rule 6.4. " Prosecution of AML cases is governed by the provisions of the Code of Criminal Procedure or the Rules of Procedure of the Sandiganbayan, as applicable.."

Rule 18.1.a. Within thirty (30) days from the effective date of these Rules, the BSP, IC and SEC shall promulgate AMLA implementing rules and regulations which shall be submitted to the Congressional Oversight Committee for approval.

Rule 18.1.b. The regulatory agencies, the BSP, the SEC and the IC, pursuant to their respective charters and regulatory powers, shall issue their anti-money laundering guidelines and circulars to effectively implement the provisions of the AMLA.

Republic of the Philippines Code No. 9160 On Anti-Money Laundering Act Of 2001, which is incorporated herein by reference, provides for the prevention of money laundering:
Rule 18.2. Anti-Money Laundering Program.

Rule 18.2.a. The Covering Entities shall develop their respective AML Procedures consistent with Section 9 and other relevant provisions of the AMLA and these Regulations, including without limitation, AMLA and these Rules, and to provide training to responsible officers and employees of Covered Entities in accordance with guidelines prescribed by applicable supervisors. Each Covered Institution shall submit its own anti-money laundering program to the applicable supervisor within such non-renewable period as the supervisor may impose in the exercise of its regulatory powers under its own charter.

Rule 18.2.b. Each anti-money laundering program must establish detailed procedures that implement a comprehensive institution-wide "know-your-customer" policy; provide for the effective dissemination of information regarding money laundering activities and their prevention, detection, and reporting; adopt internal policies, procedures, and controls; designate a compliance officer at the senior management level; establish appropriate screening and hiring procedures; and establish an audit function to test the system.

Rule 18.2.c. Covered institutions will adopt, as part of their anti-money laundering program, a system for flagging and monitoring transactions that qualify as suspicious transactions, regardless of amount, or covered transactions involving amounts below the threshold, to facilitate the process of collecting them for the purpose of future reporting of such transactions to the AMLC when their aggregate amount exceeds the threshold. All covered institutions, including banks with respect to non-deposit taking and non-government bond investment transactions, must incorporate into their anti-money laundering programs the provisions of this Rule and other policies for reporting to the AMLC all transactions that give rise to a reasonable belief that a money laundering violation is imminent, is occurring, or has been committed.

Law Regulations in Malaysia

Law of Malaysia Act 613, approved by the King on June 25, 2001, published in the Official Gazette on July 5, 2001 and enacted into law in January 2002, known as the Anti-Money Laundering Act 2001 (AMLA) or the Prevention of Haram Money Laundering Act. Malaysia is not a regional money laundering center. Its informal and formal financial sectors are highly vulnerable to drug traffickers, terrorist financing, and criminal elements. Since 2000, Malaysia has made significant progress in enacting anti-money laundering legislation. Malaysia's National Coordinating Committee on Money Laundering (NCC), comprising 13 government agencies, supervised the drafting of Malaysia's Anti-Money Laundering Act 2001 (AMLA) and coordinates government anti-money laundering agencies.

A financial intelligence unit, the Financial Intelligence Unit (FIU), has also been established. The FIU is located within the central bank, Bank Negara Malaysia (BNM). Receiving and investigating financial intelligence is the role of the FIU.. The FIU works with more than twelve other agencies to identify and investigate suspicious transactions. A good regulatory framework is in place in the Government of Malaysia (GOM), including licensing and examination systems that can regulate financial institutions.. There is currently a Memorandum of Understanding (MOU) on mutual legal assistance between the Malaysian FIU and the Indonesian FIU (PPATK). It is expected to be able to anticipate the development

of the legal needs of the community in order to effectively prevent and eradicate any form of criminal acts of money laundering, which is very harmful to government finances in particular and society in general. The eradication of money laundering is one of them by regulating the provisions of witness protection, which is related to the effectiveness or not of the arrangements to provide witness protection contained in the Money Laundering Law of 2001 (AMLA) in a bid to tackle the problem of money laundering in Indonesia.

The crime of money laundering in Malaysia is regulated by the Anti-Money Laundering and Combating the Financing of Terrorism Act 2001. The Act not only regulates the crime of money laundering, but also regulates the crime of terrorism, which is an advantage of the Malaysian law. Terrorism is made an integral part of the Money Laundering Act because Malaysia itself does not yet have laws on terrorism, because the crime of terrorism is a new crime that threatens the security of the state. Terrorists themselves acquire wealth from proceeds of other crimes, proceeds of this wealth are used to commit acts of terrorism such as purchasing explosives or weapons, and wealth acquired after committing acts of terrorism, proceeds of these criminal acts are used to commit other crimes, etc. Therefore, Malaysia has included anti-terrorism in the Money Laundering Act.

CONCLUSION

Transnational crime is an inevitable trend in the age of globalization. The borders between countries are becoming increasingly blurred. This era of globalization is complemented by advances in telematics technology, which not only makes it easier for people to communicate across countries, but also makes it easier to commit transnational crimes. One form of transnational crime that is of great concern to various countries is money laundering. Money laundering is the act of processing the proceeds of criminal activity in order to disguise the source of the illegal activity and to convert the profits of illegal and corrupt activities into assets that appear to be legitimate. In the context of law enforcement, the term money laundering is not a simple concept, but rather very complicated, because the problem is so complex that it is quite difficult to formulate its legal offenses (criminalization) objectively and effectively. This is reflected in the limitations of understanding, which are quite numerous and varied. Even in countries that have anti-money laundering regulations (laws), the limitations of understanding (definition) are relatively not the same (different). This is also the case among international institutions and organizations competent in the field of prevention and eradication of money laundering.

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