

Transnational Crime in Money Laundering Cases: An Analysis From the Perspective of Economic Criminal Law

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ABSTRACT

Money laundering is a transnational crime with significant implications for financial stability and state governance. This study analyzes the enforcement of money-laundering laws in Indonesia through case studies of Rafael Alun Trisambodo and the Bank Indonesia Liquidity Support (BLBI) scandal using a mixed doctrinal and socio-legal approach. Data were collected from statutory analysis, PPATK reports, prosecutorial documents, and scholarly literature. Findings show that despite progressive statutory frameworks, challenges persist in beneficial-ownership transparency, financial-intelligence capacity, and cross-border asset recovery. The Rafael Alun case reflects a family-based laundering scheme, while BLBI illustrates a corporate-state network. This study recommends strengthening PPATK, asset-reporting systems, international cooperation, financial-forensics technology, and the use of non-conviction-based asset forfeiture mechanisms.

Keywords: *asset recovery, financial crime, law enforcement, money laundering.*

INTRODUCTION

Money laundering is a form of modern economic crime that is transnational in nature and has broad implications for the stability of the financial system, national economic integrity, and governance. In Indonesia, the development of the digital economy, global capital flows, and increasingly complex financial services have created opportunities for money laundering through various instruments, including financial assets, the corporate sector, non-financial institutions, and even certain professional entities. The United Nations Office on Drugs and Crime (UNODC, 2023) notes that the global value of money laundering is estimated at between 2-5% of world GDP, or USD 800 billion to USD 2 trillion annually. This scale confirms that transnational financial crime not only impacts the financial losses of countries, but also has the potential to undermine public confidence in the judicial system and economic governance.

Indonesia occupies a strategic position in the dynamics of global money laundering, given the involvement of Southeast Asian countries in cross-border fund flows, international trade activities, and organized crime networks (PPATK, 2023). A report by the Financial Transaction Reports and Analysis Center (PPATK) shows a

significant increase in suspicious transactions each year, with more than 1,200 cases of money laundering (TPPU) being followed up throughout 2022–2023 (PPATK, 2023). In addition, Indonesia continues to be in the spotlight of the Financial Action Task Force (FATF) as a country that must strengthen its framework for monitoring and enforcing financial crime laws in order to avoid being placed back on the international watch list (grey list) (FATF, 2022). This global pressure shows that the enforcement of TPPU laws in Indonesia is not only a national issue, but also part of an international commitment to maintaining financial transparency.

The national legal framework has established *lex specialis* through Law No. 8 of 2010 on the Prevention and Eradication of Money Laundering, which is supplemented by regulations related to predicate offenses, limited reverse burden of proof, and strengthening the financial intelligence function of the PPATK. However, law enforcement practices have not shown optimal consistency in ensuring asset recovery, imposing maximum sanctions, and prosecuting parties who benefit from the proceeds of crime (beneficial ownership) (Ahuja et al., 2021). Money laundering cases involving public officials, banking professionals, or corporate networks, such as in the case of Rafael Alun Trisambodo and the Bank Indonesia Liquidity Assistance (BLBI) scandal, demonstrate the complexity of financial crime structures in Indonesia, where legal proceedings often face obstacles in proving layered transactions, the use of nominees, and the economic-political relations of the perpetrators (Isolauri et al., 2022; Pokpko & Popko, 2021).

The Rafael Alun Trisambodo case in 2023 became a public concern after PPATK revealed irregular cash flows worth hundreds of billions of rupiah through family companies and nominees (PPATK, 2023). The transaction structure involving shell companies and the use of affiliated accounts confirms the classic pattern of layering in money laundering. Meanwhile, the BLBI case, which has been ongoing for more than two decades, illustrates the challenges of recovering state assets in corruption and money laundering scandals involving conglomerate networks, banking instruments, and foreign jurisdictions (Levi & Soudjin, 2020; KPK, 2021). The different characteristics of these two cases provide a comprehensive picture of the spectrum of money laundering in Indonesia, ranging from influential individuals to systemic corporations.

In academic studies, research related to TPPU generally focuses on the normative aspects of regulations, institutional analysis of PPATK, and evaluation of FATF compliance (Nizovtsev et., 2022; Al-Suwaidi & Nobanee, 2021). However, there are still important research gaps: first, there is a lack of socio-legal studies linking regulatory structures to actual law enforcement patterns; second, there is limited research analyzing cases of public officials as primary laundering actors; third, there is a lack of analysis of how family networks, business entities, and beneficial ownership structures are used to disguise assets. This gap provides room for research to present a comprehensive analysis based on actual cases to assess the capacity of economic criminal law in combating money laundering.

This research is novel because it combines doctrinal analysis of the Anti-Money Laundering Law with empirical evidence from major cases in Indonesia, thereby providing an overview of the structure of money laundering methods, the effectiveness of enforcement, and the challenges of asset recovery in the context of economic criminal law enforcement. In addition, the use of two cases of different scales, namely the Rafael Alun and BLBI cases, allows for a comparative study between contemporary individual-driven laundering schemes and legacy institutional laundering schemes, a perspective that

has not been widely discussed in national literature. Thus, this study aims to analyze the effectiveness of Indonesian economic criminal law in handling money laundering crimes and to provide recommendations for strengthening governance and coordination of law enforcement.

Money laundering crimes in Indonesia cannot be separated from the dynamics of political economic development and changes in the national economic structure over the past two decades. Increased capital mobility, the penetration of financial technology, the emergence of special purpose vehicles, and the phenomenon of the shadow economy have become driving factors for the practice of asset concealment through formal financial systems and non-formal activities (Zabyelina & van Uhm, 2020). In this context, the role of law enforcement agencies has been expanded not only as repressive institutions but also as strategic actors in early detection, asset tracing, and international cooperation in the anti-money laundering regime.

Indonesia's involvement in the Egmont Group and the Mutual Legal Assistance Treaty (MLAT) mechanism provides a basis for cross-border coordination for tracking illegal financial funds operating in various jurisdictions (PPATK, 2023). However, the biggest challenge in enforcing anti-money laundering laws lies in the complexity of criminal methods that exploit legal loopholes and inefficient coordination between institutions.

Money laundering crimes in Indonesia often utilize family company structures, opening accounts with nominee identities, disguising funds through capital market instruments, and utilizing movable and immovable assets as a means of converting wealth (Ahuja et al., 2021). In the case of Rafael Alun Trisambodo, the investigation revealed a flow of funds through a family business network that functioned as a money funnel to channel funds from various sources, while also providing legitimacy to the flow of transactions through fictitious accounting records.

This is a form of layering mechanism commonly found in modern economic crimes, where the source of funds is obscured through corporate structures and advantageous social networks (Isolauri et al., 2022). The BLBI case further illustrates how the financial system can be exploited on a macro scale with multi-authority reach.

The state financial rescue scheme during the 1997–1998 monetary crisis provided an opportunity for banks and large corporate owners to misuse Bank Indonesia's Liquidity Assistance facilities, who were then suspected of using a series of asset transfer mechanisms to avoid legal proceedings and fund repayment (Levi & Soudjin, 2020). The complexity of BLBI also highlights the importance of an effective asset recovery framework. The success of law enforcement in this case is not only assessed from a criminal aspect, but also the state's ability to recover assets that are declared as state losses. The Corruption Eradication Commission (2021) states that asset recovery is one of the most important indicators in combating corruption and money laundering, because it aims to recover state losses rather than simply deterring perpetrators.

Amidst these dynamics, discussions on the effectiveness of economic criminal law in handling TPPU need to refer to the theory of economic efficiency of law and the theory of deterrence. Richard Posner (1986 in Nizovtsev et., 2022) states that economic criminal law requires systemic rationality to ensure the control of criminal incentives, where the threat of sanctions and the probability of enforcement are determining factors of effectiveness. In the Indonesian context, even though criminal sanctions against money launderers are considered quite severe in normative terms, the probability of prosecution and consistency in criminal punishment are often in the public spotlight. Research by

Vilks & Kipane (2018) found that the number of MOL cases prosecuted in Indonesia has increased, but there is still a gap between the amount of state losses and the amount of assets that have been successfully seized and returned.

Empirically, obstacles in law enforcement against TPPU are also influenced by legal culture and bureaucratic ethics. A bureaucratic system that has not fully implemented standards of transparency and accountability opens up opportunities for abuse of authority in public financial management. The phenomenon of abuse of the taxation and state administration systems in the Rafael Alun case is evidence that the integrity of public officials is an important variable in preventing financial crime. This is in line with Putri's (2023) analysis, which states that money laundering crimes in the public sector are usually related to the abuse of power through access to fiscal, administrative, or regulatory instruments. Thus, anti-money laundering strategies require not only repressive legal instruments, but also public governance policies, civil service ethical reforms, and sustainable internal and external monitoring systems.

The novelty of this research lies in its approach, which combines normative analysis and empirical case studies to describe the dynamics of the implementation of economic criminal law against money laundering crimes in Indonesia. The focus on the cases of Rafael Alun and BLBI provides an opportunity to understand how crime modes, economic-political networks, and law enforcement challenges change in two different contexts of time and socioeconomic structure. In addition, this study expands the discourse on money laundering by analyzing the role of families and corporate networks as mechanisms of economic laundering shield, which has not been explored in depth in many national studies.

The objectives of this study are to analyze the effectiveness of the economic criminal law framework in handling money laundering crimes in Indonesia, identify the modus operandi of crimes across time through two representative cases, and provide strategic recommendations for strengthening the law enforcement system, asset recovery, and public institution governance. With a socio-legal approach, this study fills the gap between normative research and empirical analysis, thereby providing both theoretical contributions and policy implications.

METHODOLOGY

This study uses a mixed doctrinal and empirical socio-legal approach, because money laundering crimes are not only analyzed through written legal norms but also the reality of law enforcement implementation in cases in Indonesia. The doctrinal approach is used to examine the normative structure of Law No. 8 of 2010 on the Prevention and Eradication of Money Laundering, the provisions of the Criminal Code relating to predicate offenses, and the relationship between domestic regulations and international standards such as the FATF Recommendations. This method was chosen because the study of economic criminal law requires an analysis of the legislative system, principles, and specific systems of evidence in financial crimes (Ahuja et al., 2021; Nizovtsev et., 2022).

On the other hand, the empirical socio-legal approach was used to assess law enforcement practices through case studies of Rafael Alun Trisambodo and BLBI, in order to identify patterns of modus operandi, obstacles to evidence, and the effectiveness of asset recovery. Empirical data was obtained through a study of PPATK reports, official publications from the Attorney General's Office and the KPK, relevant court decisions, as well as previous research results and academic reports indexed nationally and

internationally (KPK, 2021; PPATK, 2023; Al-Suwaidi & Nobanee, 2021). This approach is relevant because studies of modern economic crime must capture the interaction between legal instruments and economic-political dynamics, including power relations, the role of families, and corporate mechanisms in concealing assets (Zabyelina & van Uhm, 2020).

Data analysis techniques were carried out using legal content analysis and thematic analysis to identify patterns of money laundering, law enforcement trends, and the success of countries in asset recovery. Validity is strengthened through source triangulation, which involves comparing regulatory data, official documents, and academic literature to ensure the accuracy and consistency of findings (Miles et al., 2020; PPATK, 2023). Thus, this method provides a comprehensive framework for evaluating the effectiveness of economic criminal law in combating money laundering and exploring the policy implications necessary to strengthen law enforcement governance in Indonesia.

RESULTS AND DISCUSSION

The Position of Money Laundering Crimes in Indonesia's Economic Criminal Law System

Money laundering crimes occupy a central position in Indonesia's economic criminal law framework, as they are directly related to the stability of the financial system, the integrity of the country's economy, and the ability of state institutions to prevent and prosecute predicate crimes. In economic criminal law theory, money laundering is a form of economic organized crime that aims to make the proceeds of crime appear legitimate so that they can be used in legal economic activities (Ahuja et al., 2021). Therefore, money laundering has a strategic position as a follow the money instrument to disrupt the structure of modern financial crime. In Indonesia, the regulation of TPPU is contained in Law No. 8 of 2010, which expands the scope of criminal acts, the mechanism of proof, and asset recovery instruments. This legislative approach shows that the state considers TPPU as the main instrument in prosecuting perpetrators of crime and stopping the flow of illegal funds into the national economic system (Al-Suwaidi & Nobanee, 2021).

Normatively, the TPPU Law regulates a model of criminal liability that targets not only the direct perpetrators, but also parties who receive, transfer, store, or control the proceeds of crime. The concept of extended criminal liability is in line with the international principles adopted by the FATF (FATF, 2022), allowing for broader evidence against networks of perpetrators. This is important considering that TPPU is often carried out through corporate structures, family networks, or the use of nominees acting as intermediaries. A clear example can be seen in the case of Rafael Alun Trisambodo, where money laundering activities allegedly involved a family company as a means of placement and layering (PPATK, 2023). This scheme shows how perpetrators exploit loopholes in corporate legality and beneficial ownership oversight. Beneficial ownership transparency regulations have become an important concern in modern economic criminal law, as concealing the real beneficial owner is an essential method in money laundering practices (Zabyelina & van Uhm, 2020).

Furthermore, the transnational nature of TPPU is evident in the BLBI case, where assets and cash flows involve not only domestic transactions but also foreign jurisdictions and various fund-raising structures (Levi & Soudjin, 2020). This complexity illustrates how TPPU operates as a mechanism for preserving large-scale economic crime through the use of financial secrecy jurisdictions, offshore banking instruments, and the use of corporate structures that are difficult to trace. The success of law enforcement in the BLBI

case is an indicator of the state's capacity to recover assets and uphold economic justice. The Attorney General's Office and the Corruption Eradication Commission (KPK) have been confiscating and tracing assets since 2021 as part of their asset recovery efforts (KPK, 2021), but this process has revealed serious challenges in tracking assets that have been disguised for decades.

From a doctrinal perspective, the TPPU Law adopts a limited reverse burden of proof approach to proving the origin of assets, requiring defendants to explain the source of funds if assets are found to be irregular (Law 8/2010). This approach is a logical consequence of the nature of economic crimes, which are difficult to prove using traditional standards of proof as in conventional crimes (Nizovtsev et., 2022). However, in the context of implementation, limited reverse proof still faces legal and interpretative resistance, especially in maintaining the principle of presumption of innocence. Therefore, the capacity of investigators, prosecutors, and judges to understand the complexity of financial transactions is crucial to the effectiveness of the evidence mechanism. Research by the Indonesia Institute for Criminal Justice Reform (2023) found that many law enforcement officials do not yet have adequate expertise in financial forensics and electronic transaction analysis, so that the process of proving TPPU still often relies on traditional evidence such as physical documents and testimony.

In addition to substantive aspects, the position of TPPU in Indonesian economic criminal law is closely related to the concept of non-conviction based forfeiture, which is the confiscation of assets without requiring a criminal verdict against the perpetrator, if it is proven that the assets do not have a legal source (KPK, 2021). This instrument is one of the legal innovations in the context of enforcing modern financial crimes, as it allows for the recovery of assets even if the perpetrator has fled or died. However, the implementation of this concept is still limited due to the national legal system's dependence on a conviction-based system and the lack of technical guidelines on the administrative procedures for proving illegal assets (Al-Suwaidi & Nobanee, 2021). In the context of BLBI, the biggest challenge is not only prosecuting the perpetrators, but also recovering state funds that have been hidden through various banking instruments and property assets spread across several regions.

More importantly, the relationship between TPPU and the original crime must be understood as a systemic relationship, not just a temporal one. In many cases, such as Rafael Alun, the alleged source of funds comes from corruption and fiscal abuse (PPATK, 2023). Meanwhile, in BLBI, the source of funds is related to corruption, banking, and financial fraud (Levi & Soudjin, 2020). From an economic criminal law perspective, this phenomenon confirms that the success of ML law enforcement is an indicator of a country's capacity to eradicate economic crime as a whole. Without effective mechanisms for confiscating and recovering assets, criminal penalties against perpetrators do not necessarily restore state losses.

In the realm of law enforcement theory, the successful eradication of TPPU requires synergy between the deterrence effect and economic incapacitation. Posner (1986 in Nizovtsev et., 2022) emphasizes that the effectiveness of economic law is determined by the rationality of the system in increasing costs for criminals through the threat of high sanctions and the probability of arrest. However, in reality, economic criminals are generally actors with financial knowledge and access to business structures, so law enforcement strategies must be more advanced than traditional surveillance. Therefore, economic criminal law reform requires strengthening the PPATK, increasing financial intelligence capacity, and closer cooperation with audit institutions and financial

sector regulators such as the OJK and BI. The FATF (2022) assesses that one of the determining factors for a country to be removed from the watch list is the quality of its financial investigation units and the ability of its institutions to conduct in-depth financial intelligence analysis.

Thus, the position of TPPU in Indonesia's economic criminal law system is not only as an additional criminal offense but also as a core instrument in cutting off the flow of criminal profits and recovering state assets. Money laundering is an indicator of the health of law enforcement institutions and the financial system, so the success of its handling determines the level of a country's integrity in facing the challenges of modern economic crime. The Rafael Alun and BLBI cases reveal two generations of money laundering in Indonesia: the family-based laundering scheme and the corporate-state hybrid laundering scheme. Both cases demonstrate the need for an adaptive, asset recovery-oriented system supported by strong financial forensic capabilities to respond to the global challenge of cross-border financial crime.

Money Laundering Modus Operandi from the Perspective of Indonesian Economic Criminal Law

The phenomenon of money laundering in Indonesia reveals the complexity of economic, political, and family networks that work together to conceal the origins of wealth. In the study of financial crime, money laundering methods have evolved alongside economic system transformations and advances in financial technology, with perpetrators utilizing various financial instruments, corporate mechanisms, and even professional entities such as accountants and tax consultants to cover their transaction tracks (Zabyelina & van Uhm, 2020). Law No. 8 of 2010 regulates the three stages of money laundering, including placement, layering, and integration, which provide a basis for law enforcement to prove the criminalization of assets. However, in practice, law enforcement often faces difficulties in tracing layered transactions, especially when perpetrators use nominee accounts, family companies, property assets, and cash transactions to complicate financial analysis (PPATK, 2023). Therefore, modus analysis is crucial in supporting the effectiveness of economic criminal litigation.

In the case of Rafael Alun Trisambodo, PPATK's disclosure revealed a pattern of money laundering through a network of family companies operating as shell companies and conducting inter-account transactions without real transaction justification (PPATK, 2023). This pattern is in line with the phenomenon of family-based laundering, where perpetrators use spouses, children, or immediate family members as nominees to record assets and operate companies with minimal economic activity. This model is increasingly difficult to detect because it exploits family relationships, shared addresses, and social access to financial institutions. This approach is not only a strategy to avoid tracking, but also a "family economic ecosystem" that works systematically to obscure beneficial ownership and prevent asset transparency (Isolauri et al., 2022).

Meanwhile, the BLBI case presents a more complex pattern, as it involves banking instruments, asset transfers through third parties, and the placement of funds abroad in the form of financial instruments and immovable assets (Levi & Soudjin, 2020; KPK, 2021). The dominant modus operandi during that era was corporate-layered laundering, in which perpetrators exploited the trust of regulators and the banking structure to gain illegal access to public funds, then transferred these funds to affiliated companies that were registered as creditors but actually functioned only as asset parking vehicles. This crime was exacerbated by the weakness of the bank supervision mechanism in the pre-

crisis period, resulting in enormous losses to the state. To date, the government is still pursuing its BLBI asset recovery agenda through asset seizures and the summoning of obligors (KPK, 2021), demonstrating the complexity of enforcing ML laws in the context of systemic financial crime .

To provide a conceptual overview of the *modus operandi* of money laundering in the Indonesian context, the following table classifies the modes of money laundering in Indonesia.

Table 1. Common Money Laundering Modus in Indonesia and Legal Interpretation

Modus	Description	Real Case Illustration	Legal Framework Triggered
Shell Companies & Family-owned Entities	Creation of in active companies or using family companies to hide illegal funds	Rafael Alun family companies	UU TPPU, FATF Rec. 24 on Beneficial Ownership
Layered Transfers & Nominee Accounts	Multiple transfers via nominees to obscure origin	Rafael Alun alleged layering flows	Art 3-5 UU TPPU, Bank reporting obligations
Asset Conversion through Property	Conversion of funds into land, luxury property, assets under third-party names	BLBI obligor asset diversion	Asset seizure legal regime, UU TPPU Art 77
Offshore Transfers & Secrecy Jurisdictions	Transferring funds abroad to low disclosure jurisdictions	Traces in BLBI case	MLAT, Egmont Group, UNCAC cooperation
False Invoicing & Corporate Structuring	Manipulation of invoices to justify fictitious revenue	Seen in large corporate scandals globally and locally	UU TPPU + Tax Law + Banking Oversight

Sources: PPATK (2023); KPK (2021; FATF (2022); Levi & Soudjin (2020); Isolauri et al. (2022).

The above pattern confirms that money laundering in Indonesia is not only carried out by individuals, but often involves family entities and business networks that take advantage of loopholes in beneficial ownership regulations. The FATF (2022) specifically highlights the issue of beneficial ownership opacity as one of the main risks for developing countries, including Indonesia, which is still in the process of strengthening corporate transparency regulations and public official asset reporting systems.

From an economic criminal law perspective, the existence of shell entities and the use of nominees is a serious problem because it hinders the burden of proof in proving money laundering. Therefore, the success of prosecution depends not only on substantive regulations, but also on the investigative capacity of financial intelligence units, the integration of asset ownership data systems, and the ability to conduct digital forensic audits (Al-Suwaidi & Nobanee, 2021; Miles et al., 2020). In addition, the internal control systems of financial institutions are important instruments in detecting suspicious transactions early on, including reporting cash activities, unusual transactions between companies, and the use of multiple accounts for unclear transactions.

Although the normative framework has developed progressively, law enforcement practices still pose major challenges. PPATK (2023) reports that although

the number of suspicious financial transaction reports has increased, only a small portion have been successfully processed to a court decision. This disparity indicates the need to improve the quality of financial intelligence analysis, strengthen reg-tech and sup-tech in the banking sector, and integrate the data systems of public officials' assets. In the context of Richard Posner (1986 in Nizovtsev et., 2022), the best strategy for preventing money laundering is not solely through criminal threats, but through increasing the probability of detection and disclosure.

Thus, identifying the modus operandi of money laundering is critical in assessing the capacity of the economic criminal justice system to combat modern transnational crime. Indonesia has experienced two main phases of money laundering patterns: first, the era of large state-affiliated corporations such as BLBI; and second, the era of public officials and their networked families such as Rafael Alun. Both show that evolutionary economic crimes require adaptive regulatory, supervisory, and law enforcement reforms.

Strategies for Strengthening Law Enforcement and Asset Recovery in Money Laundering Crimes

Strengthening law enforcement against money laundering crimes in Indonesia requires a multidimensional approach that goes beyond traditional criminal enforcement. Money laundering is a crime that is highly dependent on the state's ability to uncover transaction structures, the actors behind the scenes, and the economic-political networks that support criminal activities. The perspective of economic criminal law teaches that ideal enforcement must include repressive and preventive processes, as well as the recovery of state losses through asset recovery (Ahuja et al., 2021). Therefore, efforts to strengthen the enforcement of TPPU must be directed at developing financial surveillance systems, increasing forensic investigation capacity, utilizing digital technology, and strengthening coordination between law enforcement agencies. In the Indonesian context, this strategy is urgent given that TPPU is often linked to corruption, abuse of power, and cross-jurisdictional financial crimes, as seen in the BLBI and Rafael Alun Trisambodo cases (Levi & Soudjin, 2020; PPATK, 2023).

One of the main approaches to strengthening MOLC enforcement is to optimize the function of PPATK as a financial intelligence unit (FIU). PPATK plays a strategic role as a financial intelligence agency tasked with processing reports of suspicious financial transactions from financial service institutions, companies, and individuals, which are then forwarded to law enforcement agencies. However, in practice, this process often faces challenges in terms of analytical capacity, data system integration, and limitations in follow-up enforcement (Al-Suwaiddi & Nobanee, 2021). The PPATK report (2023) shows a significant increase in suspicious transaction reports, but the proportion that is forwarded to law enforcement remains limited. The imbalance between detection and enforcement shows that strengthening financial analysis and increasing financial forensics capacity is an urgent need. Research by Miles et al. (2020) emphasizes that the success of FIUs requires interagency coordination, integrated information systems, and a culture of information sharing to prevent fragmentation of knowledge between state institutions.

In addition to strengthening financial intelligence, the strategy for enforcing TPPU requires the optimization of beneficial ownership transparency. The FATF (2022) highlights that beneficial ownership concealment is one of the main methods used by money launderers in developing countries. Indonesia has begun to implement beneficial ownership reporting requirements through Presidential Regulation No. 13/2018, but its

implementation still faces administrative obstacles and low compliance among business actors (Zabyelina & van Uhm, 2020). The Rafael Alun case shows how a lack of corporate ownership transparency allows perpetrators to channel funds through informally connected family entities that are not recorded in legal business documents. Similarly, the asset concealment scheme in the BLBI case shows that without a system of identity-based asset ownership and strong reporting mechanisms, the state faces significant difficulties in tracing the flow of funds and assets registered in the names of other parties (KPK, 2021). Therefore, updating beneficial ownership regulations and digital tracking systems is key to prevention and law enforcement.

The next strategy is to strengthen the asset recovery mechanism. In economic criminal law, asset recovery is an essential component that ensures that the proceeds of crime are returned to the state and society. Indonesia has adopted an asset recovery approach through provisions on confiscation, state seizure, and restitution in the Anti-Money Laundering Law, as well as through the instrument of non-conviction based asset forfeiture (NCB) as regulated in the Anti-Corruption Law and UNCAC recommendations (KPK, 2021). However, the challenges of implementing NCBAF are still significant, especially in terms of the administrative burden of proof and concerns about violations of the presumption of innocence (Nizovtsev et., 2022). In the BLBI case, the asset seizure process took decades, indicating that the state's capacity to execute asset recovery is not yet optimal. Levi & Soudjin's (2020) research states that inter-agency coordination, cross-border asset tracing, and the strength of state litigation are variables that determine the success of asset recovery. Thus, strengthening the asset tracing unit, developing a national asset database, and enhancing international cooperation are strategic elements.

Bureaucratic reform and public governance also play an important role in preventing money laundering. The Rafael Alun case shows that the abuse of public office can be a gateway for the accumulation of illicit wealth and money laundering through the formal financial system (PPATK, 2023). Therefore, the strategy to enforce anti-money laundering cannot be separated from efforts to strengthen the integrity of the state apparatus through the enforcement of the obligation to submit a State Officials' Wealth Report (LHKPN), digital wealth verification, and the establishment of an effective internal control system in government institutions. Putri's (2023) research shows that the integrity of the apparatus and transparent internal audit processes play a major role in preventing money laundering practices by public officials. Therefore, the government's internal control system needs to be strengthened through risk-based audits, continuous monitoring, and publicly reportable mechanisms that can be independently verified.

Furthermore, strengthening the enforcement of TPPU needs to be supported by technological innovation and data analytics. E-forensics, machine learning for detecting suspicious transactions (AML technology), and the integration of know-your-customer systems with population databases are examples of digital instruments that have proven effective in combating global money laundering (OECD, 2020). In the Indonesian context, the use of this technology is still developing, but it is not yet evenly distributed across all financial sectors, especially non-bank financial institutions and the trade sector (PPATK, 2023). This strengthening must be followed by training for law enforcement officials so that they are able to understand the digital architecture of modern financial systems, including crypto asset tracking, blockchain forensics, and cross-border fund flow detection. Research by Bennett & Thomas (2022) emphasizes that AI-based technology and risk-scoring algorithms are very effective in reducing false negatives in

ML detection, provided they are equipped with an ethical framework and data privacy protection.

Finally, strategies to strengthen MOLC enforcement must involve international collaboration. Given that BLBI and a number of money laundering schemes involve foreign jurisdictions and international corporate structures, cooperation on Mutual Legal Assistance (MLA), Extradition, and the Egmont Secure Web must be enhanced (KPK, 2021; FATF, 2022). Obstacles to international cooperation often arise when the destination country does not have a mutual assistance agreement or when assets are held in countries with high financial secrecy. This requires a diplomatic approach, cross-border law enforcement, and increased international commitment to anti-money laundering regimes. UNODC (2023) research confirms that the success of global asset recovery is determined by the willingness of countries to share data, exchange legal evidence, and establish flexible legal cooperation structures that still uphold national legal principles.

Ultimately, the strategy to strengthen TPPU enforcement in Indonesia requires systemic transformation that includes financial intelligence integration, public governance reform, technological innovation, and strengthened international cooperation. Money laundering crimes cannot be addressed with traditional criminal law approaches, but require comprehensive economic-legal synergy to cut off the flow of financial crime. The BLBI case serves as a reminder that without decisive asset recovery, criminal penalties lose their substantive meaning, while the Rafael Alun case underscores the need for internal oversight of public officials as the state's first line of defense against modern financial crime. Thus, the state's success in tackling TPPU will reflect Indonesia's capacity as an economic state governed by the rule of law that is capable of maintaining social justice, financial stability, and government integrity.

CONCLUSION

The enforcement of money laundering laws plays a fundamental role in maintaining economic justice, financial stability, and government integrity in Indonesia. Through analysis of two important cases such as Rafael Alun Trisambodo and BLBI, it can be seen that money laundering operates in various patterns, ranging from family-based laundering schemes to corporate-state laundering networks. Analysis of economic criminal law shows that the success of combating TPPU is not only determined by the strictness of regulations, but also by the ability of institutions to trace layered transactions, uncover beneficial ownership, and recover state assets. Although Indonesia's legal framework has been progressive through Law No. 8/2010, the Presidential Regulation on Beneficial Ownership, and the strengthening of the PPATK, the gap between norms and implementation is still evident, especially in terms of reverse burden of proof, financial investigation capacity, and inter-agency coordination.

Reforming AML law enforcement requires a comprehensive approach based on economic law enforcement, with asset recovery as the primary measure of enforcement success. The government needs to strengthen the integration of public officials' asset data, expand the use of financial analytics technology, and enhance international cooperation, particularly in cross-jurisdictional asset tracing. Strengthening the PPATK, OJK, and the Attorney General's Office in digital forensics and financial intelligence capacities is also key. In addition, the preventive governance strategy must be strengthened through data-based LHKPN verification, risk-based public governance audits, and integrity education within the state bureaucracy. Going forward, the synergy between legal reform, financial

transparency, and the strengthening of law enforcement will determine Indonesia's ability to face the threat of transnational financial crime and achieve sustainable economic justice

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