

# Constraints To The National Narcotics Agency's Synergicity With The Center For Financial Transaction Reporting And Analysis In Preventing And Eradicating The Crime Of Money Laundering In The Narcotics Business

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**Abstract** *The circulation of narcotics by organized crime continues to increase and even seeks to disguise or eliminate the proceeds of narcotics crime by laundering money through financial institutions or by investing in economic activities. The problem in this study is regarding efforts to overcome the synergy constraints of BNN (National Narcotics Agency) and PPATK (Financial Transaction Reporting and Analysis Center) in preventing and eradicating money laundering crimes from the narcotics business. This study uses normative legal research (library) to draw conclusions about efforts that can be made in synergy between BNN and PPATK in preventing and eradicating criminal acts of laundering from the narcotics business, namely collaboration with related institutions and agencies, increasing the exchange or request for information and statistical data. speedy handling of narcotics crime cases as well as improving PPATK's performance and updating the agreements set forth in the MoU*

**Keywords:** *Obstacles, Synergy, National Narcotics Agency, PPATK, Crime, Money Laundering, Narcotics Business.*

## I. INTRODUCTION

The problem of narcotics in Indonesia is still something that is urgent and complex. The circulation of narcotics by organized crime continues to increase and even seeks to disguise or eliminate the proceeds of narcotics crime by laundering money through financial institutions or by investing in economic activities. Perpetrators of criminal acts generally try to hide or disguise the origin of assets resulting from criminal acts in various ways so that the assets resulting from criminal acts are difficult to trace by law enforcement officials so that they can freely utilize these assets for both legal and illegal activities.

Therefore, the act of concealing, disguising the origin of assets or money laundering activities not only threatens the stability and integrity of the economic system and financial system, but can also endanger the foundations of social, national and state life based on Pancasila and the State Constitution. Republic of Indonesia in 1945.

Attempts to eliminate or disguise the proceeds of narcotics crime make this act a double crime, namely a narcotics crime and at the same time a money laundering crime. The crime of money laundering as a crime has a characteristic, namely that this crime is not a single crime but multiple crimes. The crime of money laundering does not stand alone because the assets that are placed, transferred or diverted by means of integration are obtained from the crime

This means that there has been another crime that preceded it (predicate crime). Money laundering generally originates from the following activities:

1. Money from the drug/narcotics trade;
2. Money from tax manipulation;
3. Money resulting from collusion by certain government officials when manipulating the purchase of government goods;
4. Money resulting from collusion between government officials and businessmen in handling a project;
5. Money resulting from illegal operations in the form of a monopoly by state officials or their cronies;
6. Money from illegal levies by state officials;
7. State confiscated money;

Money laundering activities have become an integral part of the world of crime. This is something that is often felt but difficult to prove, and is known as money laundering, which is a form of crime that is often inherent in white-collar crime. In connection with the criminal case of money laundering originating from narcotics, after the perpetrator has been convicted, then the assets of the crime are confiscated.

In Indonesia, assets seized as evidence resulting from criminal acts, in this case money laundering originating from narcotics, are handled by the prosecutor's office where the prosecutor's office acts as executor which is then handed over by the national narcotics agency (BNN) to be used as a support for the performance of the national narcotics agency (BNN) to eradicate narcotics crime in Indonesia.

On June 13, 2007 a Memorandum of Understanding (MoU) was signed between the National Narcotics Agency (BNN) and the Financial Transaction Reports and Analysis Center (PPATK), in the Meeting Room of the National Narcotics Agency Lt.7, Jl. MT. Haryono No.11 Cawang, East Jakarta. This agreement was implemented in order to support the Prevention, Eradication of Drug Abuse and Illicit Trafficking (P4GN) program, which is a program oriented towards a vision of a Drug-Free Indonesia in 2015.

This agreement is motivated by the crucial condition of the problem of both abuse and distribution. The resultant of this condition is the increase in various crimes both conventional, transnational and crimes with new dimensions. Considering that drug crime is a transnational crime, there are many motives and modes that can be carried out by drug offenders to be able to achieve the target of crime operations carried out according to their needs, one of which is an economic factor that is oriented towards financial factors, given the relatively expensive selling power of drugs. , so that the perpetrators commit crimes in the economic field for the benefit of the narcotics business.

## II. METHOD

This study uses normative legal research methods (library) with secondary data collection consisting of laws and regulations, books, journals and a large Indonesian dictionary. Furthermore, the secondary data was analyzed qualitatively to get conclusions in this study.

## III. RESULT AND DISCUSSION

### Pattern of Money Laundering from Narcotics Business

Money laundering activities include the placement phase, namely placing cash proceeds from crime into the financial system through the mechanisms and instruments of financial service providers. After entering the financial system, the next phase is layering. This activity is very complicated because it is based on efforts to split illegal money through various kinds of financial transactions related to frequency, volume and complexity. The final step is to reunite all the money that has been split into various financial transactions in the layering phase into a legal business. This activity is also known as integration.

The pattern of money laundering referred to above is associated with the narcotics product business as follows:

#### Placement Phase

In the placement phase, the money from the drug trade is put into the financial system by placing it through a banking institution. The money is the result of drug trafficking in cash. This money is then put into the financial system through banking institutions. Banking institutions that are places for storing money from drug trafficking are overseas banks which are classified as high risk (high risk foreign banks).

High risk foreign banks are a means of placing money from drug trafficking because they have financial mechanisms and instruments, including:

- a. Anonymous bank account;
- b. Internet banking and phone banking services;
- c. ATM cards and credit cards;
- d. availability of banking services anywhere;
- e. unlimited cash withdrawals; And
- f. financial transfers without the need to include the name of the sender (anonymity).

#### Layering phase

The layering phase in laundering money from drug trafficking is carried out to layer, divide or obscure the money from drug trafficking in the financial system so that it is difficult to detect. Layering activities in laundering money from drug trafficking include:

##### a. Smurfing

Smurfing is an activity of transferring a certain amount of money to various other accounts in domestic or foreign banks. Some of the money from the drug trade from traders (retail dealers or street dealers) is deposited with the main actors in the drug trade through the cartel financial manager.

The money is deposited in cash and placed into the financial system through banking institutions. Then, the money from the drug trade that has been collected is broken down into various other cash denominations aimed at the smurfs. Furthermore, it is these smurfs who layer the money from the drug trade by crediting it to various accounts at several banks. The money is credited with an amount that is not much different.

b. money changers

Money changer in laundering money from drug trafficking is the activity of exchanging some money from drug trafficking with foreign currency. The foreign currency used by drug traffickers is USD. This money changer mode includes activities, in which large amounts of money from drug trafficking are contained in the financial system at banking institutions in exchange for foreign currency.

Purchasing foreign currencies through electronic financial transaction services and instruments provided by banking institutions. Then, there was a transaction between the money from the drug trade using the local currency which was exchanged for a sum of money in foreign currency. As a result, there is a difference in the value of the currency that has been exchanged. Cases of money changers in money laundering activities resulting from drug trafficking are rife in Colombia, Panama and Indonesia.

c. Buying a stock portfolio

The stock market is a fairly effective means of money laundering. According to Freddy R. Saragih, this is because various investors, both domestic and foreign, can carry out various financial transactions on the stock exchange.

Money from the drug trade is transferred to brokers to be managed on the stock exchange. The money was used to purchase a number of stock portfolios from companies labeled infamous companies. In addition, these companies are classified as red flags or dotcom companies.

### Integration

Integration as the final activity in the process of money laundering from drug trafficking no longer has a direct relationship with the original crime. There are three reasons for conducting business integration in laundering money from drug trafficking, namely:

- a. Try not to involve many people in the business;
- b. Have business staff who have work skills; And
- c. Creating a business that is engaged in trade and has low production value.

Integration in laundering money from drug trafficking in the form of investments in the restaurant, entertainment, sports and property (real-estate) businesses.

a. Invest in the restaurant business

The restaurant business is a business that has long been run by the Italian mafia in the United States. The restaurant business is in the form of a pizza restaurant or other Italian specialties. In addition, according to Savona and De Foe, drug traffickers in China and Japan also have similar businesses.

b. Invest in the entertainment business

The entertainment business includes casinos, horse racing and lotteries. The casino business is a bustling business carried out by drug traffickers. The fast turnover of money is the reason. However, this gambling business can only be carried out in countries where it is legal.

c. Invest in sports business

Investments made by drug traffickers originating from Colombia are aimed at the sports business, namely the ownership of the America Soccer team. Not only that, the business of selling sports equipment is also a place for re-unification of money from the drug trade.

d. Investment in the property business (real-estate)

Business in the property sector is carried out by buying real-estate through affiliated companies. Then, drug traffickers buy the real-estate at a low price and resell it at the market price.

### Legal Facts

The crime of illicit drug trafficking has long been believed to have a close relationship with the money laundering process. The history of the development of the typology of money laundering shows that the narcotics trade is the most dominant source and the main predicate crime that gives rise to money laundering crimes. Organized crime always uses this money laundering method to hide, disguise or obscure the results of this illicit business so that it appears as if they are the result of legitimate activities.

In this context, it can be said that the crime of money laundering is a crime that has a distinctive feature, namely that this crime is not a single crime but a multiple crime. The crime of money laundering does not stand alone because the assets placed, transferred, or diverted by way of integration were obtained from the crime, meaning that there was already another crime that preceded it (predicate crime).

Some legal facts about the crime of money laundering with the predicate crime, namely the narcotics business, are as follows:

**The case of the late Freddy Budiman narcotics syndicate**

In February 2018, the National Narcotics Agency (BNN) revealed that a narcotics syndicate had set up six fictitious companies engaged in the export-import sector to launder money proceeds worth Rp. 6.4 trillion. The money was obtained from the proceeds from developing the narcotics syndicate case of the late Freddy Budiman and his men, Togiman and Haryanto Candara who are currently serving a sentence. In this case, BNN arrested three perpetrators who were suspected of committing the crime of money laundering, namely Devi Yuliana, Hendi Rambli and Fredy Heronusa Putra. The three perpetrators were arrested in Jakarta.

The mode used by Devi as the main actor is using at least six fictitious companies engaged in the import-export sector, namely PT Prima Sakti Santosa, PT Untung Jaya Sejahtera, PT. Dikjaya, PT Graphic Utama, PT Hoki Cemerlang Investama, and PT Devi and Partners Prosperous. The six companies are used to carry out financial transactions from a number of drug dealers. To cover up the transaction, Devi offered a number of employees vacation abroad, and ordered her employees to open accounts overseas. There are 14 countries where money transfers are received, including China, Japan, India, Germany and Australia. Transactions were carried out from 2014-2016 with 2,136 fictitious invoices and collected in foreign exchange companies. This crime can be disclosed through a PPATK Inspection Result Information report regarding suspected suspicious transactions of Rp. 6.4 trillion.

As a result of their actions, the three perpetrators were charged with Article 137 of Law Number 35 of 2009 concerning Narcotics, and Articles 3, 4 and 5 of Law Number 8 of 2010 concerning Prevention and Eradication of Money Laundering Crimes. In addition, the BNN also confiscated three apartment units, six shop units, one house unit, three cars, two shop units and a piece of land in South Jakarta, while the cash confiscated in the hands of investigators amounted to Rp. 1.65 billion.

**The arrest of 5 (five) drug traffickers in the Indonesia-Malaysia network**

Another case that occurred in July 2018, as stated by Heru Winarko, Head of the National Narcotics Agency (BNN) quoted from detik.com on July 17 2018, revealed that the BNN had also succeeded in developing a case of smuggling 10.39 kg of methamphetamine-type narcotics. BNN uncovered money laundering crimes with a total value of Rp. 3.9 billion. This case stems from the arrest of 5 (five) members of the Indonesia-Malaysia network of drug dealers. One of the perpetrators who was arrested was Irawan alias Dagot who is a Malaysian citizen who is a convict at the Pontianak Class IIA Penitentiary, West Kalimantan.

From the development of this case, BNN was able to arrest Feni as the manager of Irawan's money, as well as secure Intan as the account owner. The proceeds from the drug trade were laundered through Intan's account. In this case, Irawan asked Intan's husband who is also a Malaysian citizen to open a company in Indonesia. The company acts as a cover for laundering money from the sale of these narcotics.

Furthermore, Heru Winarko, Head of the National Narcotics Agency (BNN) quoted from detik.com on July 17 2018 revealed that Intan served as Director and owner of PT Surya Subur Jaya and PT Nusa Primula Maju Jaya accounts. These two companies are used as places for laundering money from the proceeds of narcotics crimes. The evidence seized was a private bank account amounting to Rp. 526 million, an account at a state bank of Rp. 1.6 billion, and one housing unit in Pekanbaru Riau worth Rp. 1.1 billion. The suspect Intan is suspected of having committed an unlawful act because he kept, transferred, received and enjoyed the proceeds from narcotics crimes as referred to in Article 137 letter b of Law Number 35 of 2009 concerning Narcotics, as well as Articles 3, 4 and 5 paragraph (1) of the Law Number 8 of 2010 concerning Prevention and Eradication of Money Laundering Crimes.

**The case of Pony Tjandra and Togiman aka Toge**

Cases of criminal acts of money laundering by corporations from the proceeds of narcotics crimes can also be seen in the cases of Pony Tjandra and Togiman alias Toge. Toge is a well-known figure from the BNN because he was sentenced to death twice and added to the ML case with a penalty of 17 years in prison, as said by Inspector General Arman Depari always the Deputy for Eradication of the BNN quoted from detik.com on February 28 2018 revealed that the suspect made transactions using the modus operandi 6 (six) fictitious companies during the period 2014 to 2016 through PT Prima Sakti, PT Untung Jaya, PT Dikjaya, PT Graphic Utama, Hoki Cemerlang, and Devi and Rekana Sejahtera.

From this case, BNN was able to confiscate 3 apartment units, 5 shophouses, 1 house, 3 cars, 2 shops, and a piece of land in South Jakarta. For his actions, he is threatened with Article 137 of the Narcotics Law and Articles 3, 4 and 5 of the Money Laundering Law.

**Efforts to Overcome Obstacles in BNN Synergy with PPATK in Preventing and Eradicating Money Laundering Crimes in the Narcotics Business**

Drug crime is a crime that is transnational in nature, there are many motives and modes that can be carried out by drug offenders to be able to achieve the target of crime operations carried out by their needs, one of which is an economic factor that is oriented towards financial factors, considering the selling power of drugs

which are relatively expensive, so that the perpetrators commit crimes in the economic field for the benefit of the narcotics business.

The Financial Transaction Reports and Analysis Center (PPATK) and the National Narcotics Agency (BNN) are committed to supporting the realization of a prosperous, just and prosperous Indonesian society based on Pancasila and the 1945 Constitution of the Republic of Indonesia. This commitment is shown by the two institutions by making efforts to prevent and eradicate the abuse and illicit traffic of Narcotics which are very detrimental and dangerous to the life of the Indonesian people. In addition, this commitment is also demonstrated by maintaining the integrity and stability of the financial system that encourages economic growth, one of which is by preventing and eradicating the entry of funds from the Crime of Money Laundering (TPPU), especially those originating from Narcotics Crimes into the financial sector in Indonesia.

On June 13, 2007 a Memorandum of Understanding (MoU) was signed between the National Narcotics Agency (BNN) and the Financial Transaction Reports and Analysis Center (PPATK), in the Meeting Room of the National Narcotics Agency Lt.7, Jl. MT. Haryono No.11 Cawang, East Jakarta. This agreement was implemented in order to support the Prevention, Eradication of Drug Abuse and Illicit Trafficking (P4GN) program, which is a program oriented towards a vision of a Drug-Free Indonesia in 2015. This agreement was motivated by crucial conditions, both abuse and circulation. The resultant of this condition is the increase in various crimes both conventional, transnational and crimes with new dimensions.

Seven main things that become the scope of the memorandum of understanding include information exchange, handling of Narcotics and Narcotics Precursor crimes and TPPU, formulation of legal products, research or research, outreach, education and training, and development of information technology systems by each agency in the framework of cooperation.

With this agreement, the National Narcotics Agency can optimize its performance, especially in the field of investigations and investigations, because with this agreement, the PPATK, which has duties and authorities relating to financial transactions, can provide information relating to financial transactions that are suspected of being closely related to drug abuse and illicit traffic. so that it can support BNN in uncovering various drug cases both at the national and international levels. Access to PPATK information to the BNN database is one form of agreement between BNN and PPATK, in addition to access to other internal information. This will be a collaboration that creates synergies between the two institutions that lead to professionalism and achievement of the vision of a Narcotics-Free Indonesia.

However, based on the legal facts described above, namely the narcotics syndicate case of the late Freddy Budiman, the Pony Tjandra and Togiman alias Toge cases and the arrest of 5 (five) drug dealer syndicates in the Indonesia-Malaysia network, the Agreement (MoU) between the National Narcotics Agency (BNN) and the Financial Transaction Reports and Analysis Center (PPATK) described their ineffectiveness in preventing money laundering crimes with predicate crimes, namely the narcotics business.

Based on the researchers' research, there are several obstacles in the synergy between BNN and PPATK in preventing the eradication of money laundering from the narcotics business, including:

#### **Internal factors**

The main obstacle faced by the BNNP/BNNK itself is the slow coordination with BNN RI. As previously known, to obtain bank transfer data and block bank accounts, the BNNP/BNNK must first submit a letter of request for requesting bank transfer data and a request for blocking on behalf of the suspect along with a Case Submission Report containing a resume of case files to BNN RI. Given the importance of bank transfer data as the main evidence, speed is urgently needed in coordinating because it is feared that the perpetrator's money can move and change hands so that investigators will find it difficult to trace the money, especially if the perpetrator's bank account has not been blocked, it will not close. it is possible that all remaining savings balances will be taken.

#### **External Factors**

The obstacle faced was the length of time the process of requesting bank mutation data by the relevant bank was concerned. This of course can hinder the investigation process which should run quickly. With this obstacle, BNN RI intensively made efforts to coordinate with the bank to immediately issue (print out) all requested mutation data for further investigation. Meanwhile, the last obstacle is that access is quite a long distance and costs a lot for BNNP/BNNK to coordinate with PPATK. In an effort to overcome this obstacle, representatives of BNNP/BNNK investigators departed for Jakarta with a budget that had been adjusted to the investigation budget provided by BNN RI. Of course, the obstacles faced by the BNNP/BNNK are not in accordance with one of the principles of criminal procedural law, namely the principle of simplicity, speed and low cost in conducting an investigation, of course speed and timeliness are needed because it involves human rights, namely the detention of suspects. With the time limit for detaining suspects as stipulated in the Criminal Procedure Code and Law No. 35 of 2009 concerning Narcotics, the investigation process must also be completed in a timely manner.

The description of the obstacles referred to above, the efforts that can be made are as follows:

#### **Collaboration with Related Institutions and Agencies**

Narcotics crime is a transnational crime involving various jurisdictions so that it requires better cross-national coordination. At the meeting PPATK has submitted several Analysis Results and Examination Results to BNN and Polri but the follow-up specifically related to the implementation of TPPU still needs to be optimized.

On the other hand, the modes and patterns of transactions of narcotics perpetrators are increasingly complex, which not only utilize bank financial institutions but also foreign exchange traders and money remittances. Thus, PPATK, Polri and BNN will coordinate further regarding the handling of money laundering crimes from narcotics cases.

Regarding efforts to optimize asset recovery, PPATK has also encouraged the National Police and BNN to involve the Ministry of Law and Human Rights as the Central Authority in handling cases from the start in order to withdraw funds from narcotics crimes abroad through the Mutual Legal Assistance (MLA) scheme.

#### **Increase the exchange or request for information and statistical data on the handling of narcotics crime cases quickly**

It is hoped that the real work after the signing of the Memorandum of Understanding will be carried out immediately at the technical level between PPATK and BNN, especially in terms of exchanging information and tracing the assets of narcotics offenders. Through this collaboration, it is hoped that in the end it will impoverish drug dealers, paralyzing all their space for movement. We will also focus on the asset turnover of narcotics offenders.

Finally, the Head of BNN expressed his appreciation to PPATK for their willingness to establish synergy and cooperation in handling drug problems. In line with the Head of BNN, the Head of PPATK said that the signing of the Memorandum of Understanding for the third time showed that the working relationship between PPATK and BNN was so close. In the future, coordination with the BNN will be more intense, one of which is related to requests for information and statistical data on the handling of narcotics crime cases, bearing in mind that PPATK and stakeholders will face a Mutual Evaluation Review by the Asia Pacific Groups on Money Laundering (APG).

PPATK also invites BNN to improve coordination and exchange of information through the Secure Online Communication application, which is a coordination network mechanism with law enforcement officials. SOC is a tool that makes it easier, because requests for information from PPATK can be faster, safer and more controlled.

#### **Improving PPATK's performance**

PPATK's efforts to improve analysis and examination results are as follows:

1. Strengthen HA & HP monitoring function
  - a. PPATK proactively requests periodic feedback from agencies receiving HA and HP PPATK
  - b. Monitoring through mass media both print and electronic
2. HA & HP quality improvement
  - a. Updating customer data contained in the SIPESAT application.
  - b. Development of capacity building for PPATK staff, especially those related to the mode and typology of transnational organized crimes.
3. Increase the use of Information Systems
  - a. Expansion of online database access to strategic partners in order to provide comprehensive information to support HA and HP PPATK.
  - b. Making efforts to improve PPATK's internal Information System which is expected to become an increasingly reliable application for analysis needs.

In addition, PPATK has coordinated with the agency receiving the data, there is still some data that needs to be completed (incomplete) and the timeframe for the case

## **IV. CONCLUSION**

The conclusions in this study, regarding efforts that can be made in synergy between BNN and PPATK in preventing and eradicating criminal acts of laundering from the narcotics business, namely collaboration with Related Institutions and Agencies, Increasing the exchange or request for information and statistical data for handling narcotics crime cases quickly and improve the performance of PPATK and renew the agreements set forth in the MoU.

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