

RESEARCH ARTICLE

# Implementation of Policies on Law Enforcement in Money Laundering Cases in Indonesia and Denmark

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## ABSTRACT

*Money laundering is a serious crime, this crime can occur in several jurisdictions, so it can be said to be a transnational crime. Money laundering as one of the crimes committed by a group of people or more than one person. This form of money laundering is in the form of a criminal offense, while the original crime is often called a predicate offense. Some of the motivating reasons for committing money laundering crimes are that the money is used as capital as a business or sent to non-banking financial service providers such as insurance. The impact of money laundering will disrupt the national and international economy. In addition to these impacts, money laundering will result in disruption of the operational effectiveness of the economic system which will later lead to bad economic policies, especially in certain countries. Money laundering practices can also destabilize the national economy because money laundering causes sharp fluctuations in interest rates and exchange rates. The problem of money laundering will never run out even though the development of this case from year to year is increasing both in a number of state losses and its modus operandi. This study aims to see the implementation of policies on money laundering cases in Indonesia and will be compared with Denmark so that it can find out the implementation of each country's policies and what obstacles the Indonesian state faces in eradicating money laundering crimes. So the author is interested in giving the title of this study as Implementation of policies on law enforcement in money laundering cases in Indonesia and Denmark. The legal research used is qualitative research which is included in the category of normative research. The data used is secondary data.*

**Keywords:** Policy, Law Enforcement, Money Laundering.

## INTRODUCTION

The government is obliged to formulate policies or laws that are in accordance with people's current lives until the future because the pattern and level of life in Indonesia cannot be separated from the development of community conditions. The pattern of community development in the future should be able to encourage the development of the legal system. Society is served with the law in this regard. Indonesia needs to prepare to face globalization as a nation and as part of the world.

Globalization is the expansion of technology and information that will affect how any society can act in the field of culture or other knowledge. Apart from social and logical

progress and development, human behavior according to the general population and state life is also increasingly multi-complex.

Money laundering crimes are currently receiving special attention from all circles. International cooperation in countermeasures covers national, regional, and global scales. (Arifin & Choirinnisa, 2019) Money laundering is known as a double crime because it is a continuation of the predicate crime where the perpetrators use sophisticated, creative, and complex ways to turn illegal amounts of money into legal money. (Muh. Afdal Yanuar, 2019) Money laundering should be focused on tracing funds or financial transactions. (Ginting, 2021) Money laundering has schemes whose purpose is to hide illicit money profits that appear to come from legal sources. (Ogbeide et al., 2023) In the future, this money laundering case will have an impact on the economy and business in every country because it will continue to sabotage the integrity of financial markets. (Iwan Kurniawan, 2013) Generally, money laundering uses the transmission or submission of other monetary actions resulting from various other criminal activities such as corruption or the sale of narcotics. (Lestari Aprilia, 2021) People who do this have the motivation to disguise the source of money from a crime so that the money can be freely used without having to be proven to the financial audit agency in any country. (Yunus Husein, 2017) There are many factors push the growth of money laundering activities in different countries, leading to various causes of money laundering. The following is some of the main reasons why money laundering occurs: (Sutan Remy Sjahdeini, 2016) The first factor is due to globalization. In this case, globalization can result in money laundering that utilizes the international financial and banking system to carry out money laundering activities. The second factor is the rapid development of technology. Developments in this technology can probably be said to be the most supportive factor for the increase in money laundering. The development of information technology such as the internet, for example, can have an impact on the loss of borders between countries. The third factor is the provision of bank secrecy. This provision makes it difficult for authorities to investigate accounts they suspect or the presence of illegal activity; The fourth factor is made possible by banking regulations in a country for a person to deposit funds in a bank under a pseudonym; Then the fifth factor is due to the emergence of a new type of money, namely electronic money or E-money, which is related to the rise of electronic commerce or e-commerce through the internet.

From the previous opinion, we can see that the more developed a country is, the higher the crime rate, especially in the financial sector. In 2022, there are 5 cases categorized as money laundering in Indonesia, including corruption of IDR 81.3 trillion, gambling crimes of IDR 81 trillion, green finance crimes or crimes related to natural resources of IDR 4.8 trillion, narcotics crimes of IDR 3.4 trillion, embezzlement of foundation funds of IDR 1.7 trillion according to the results of the Center for Financial Transaction Reporting and Analysis which revealed Money Laundering cases. (Andry Triyanto Tjitra, 2023) Opinion from the Danish state, Danske Bank described 2022 as a "different year" with soaring inflation and high volatility following Russia's invasion of Ukraine and the deteriorating macroeconomic outlook. Danske Bank also set aside nearly 1.8 billion euros in a legal case related to a money laundering scandal involving an Estonian branch. (Danske Bank Staff, 2023). Based on the background that has been written, this article will discuss the implementation of policies in the prevention of money laundering in Indonesia and

Denmark and see what obstacles will be faced with the implementation of these policies, especially in Indonesia.

## METHODS

In this study, qualitative research methodology will be used. Qualitative research is conducted to analyze events, phenomena, social dynamics of groups or individuals. Therefore, the process of qualitative approach research begins with the development of basic assumptions. This study aims to see policies on money laundering cases between 2 countries, namely Indonesia and Denmark, and analyze the obstacles that will be faced with the implementation of these policies, especially in Indonesia.

Meanwhile, the research approach uses a normative juridical approach. Normative juridical is an approach based on legal concepts and laws and regulations related to this research. This approach is also known as the literature approach that studies books, laws and other documents related to this research

## RESULT AND DISCUSSION

### 3.1 Implementation of Policy in Money Laundering Cases in Indonesia and Denmark

**In Indonesia.** If viewed based on criminal law policy that addressing corporate crimes such as money laundering, there are approaches that can be taken other than through a repressive criminal justice system that leads to the imposition of sanctions and/or criminal actions. For non-criminal methodological situations are no less important, as expressed by Clinnard and Yeager who have been quoted from their book Muladi and Diah Sulistyani:<sup>1</sup>

- a. Voluntary strategies for changing the structure and behavior of the company;
- b. Strong political intervention by a state in order to have the power to force changes in corporate organizational reform, accompanied by criminal, civil, and/or administrative legal sanctions to prevent it;
- c. Boycotting a company's product is an act and pressure from consumers.

Barda Nawawi Arief<sup>2</sup> said that policies to prevent crime are essentially part of efforts to protect society and to achieve public welfare. The methods used are not limited to correctional facilities, but they can also be used in ways that cannot be punished. Because it focuses more on prevention, but the latter method is considered the most strategic. Corporations are subject to the following regulations as a result of Law Number 8 of 2010 replacing Law Number 25 of 2003 concerning the Prevention and Eradication of Money Laundering.

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<sup>1</sup> Muladi and Diah Sulistyani RS. (2015). *Corporate Criminal Liability*. PT. Alumni.

<sup>2</sup> Muladi and Bardad Nawawi Arief. (2015). *Theories and Policies of Criminal Law*. PT. Alumni.

Corporate law has the same responsibilities as individuals (natuur person) because of their position as (recht person). This is evident from the clause stating that a corporation or its controllers will be charged with a crime if they engage in the type of money laundering outlined in Articles 3, 4, and 5. Human beings (elements of each person) are subjected to the acts listed in Articles 3, 4, and 5. It is possible to say that the inclusion of a corporation in a criminal offense is a deviation from the provisions of the Criminal Code. While this is legally justified, it can make it difficult to enforce and interpret. Corporations suspected of money laundering placement, layering, and integration first indicate whether individuals or on behalf of a corporation concerned, so that sanctions can be imposed according to the qualifications of each person who commits money laundering crimes.

In imposing sanctions in accordance with their respective qualifications, corporations that commit money laundering crimes in the form of placement, layering, and integration must state whether these actions include money laundering crimes committed by individuals or on behalf of the management or corporation concerned. Article 7 of law number 8 of 2010 regulates several different types of crimes and is divided into two parts, namely the main punishment consisting of fines and additional penalties. The inclusion of imprisonment in lieu of a maximum fine of one year and four months for the management or controller of the corporation is listed in article 8.

Article 9 paragraph 2 states that the sale of assets belonging to the corporation seized as referred to in paragraph (1) is insufficient, imprisonment in lieu of fines is imposed on the

controller of the corporation and takes into account the fines that have been paid. Regarding the imprisonment in lieu of fines, it can be carried out, including the calculation of confiscated corporate assets as a reason for reducing the criminal confinement in exchange for fines, which is not further regulated in the explanation of the law. So it can be concluded that Law Number 8 of 2010 still has shortcomings and weaknesses.

To support efforts to prevent and eradicate money laundering, it can be through follow the money approach or by finding where the money comes from. This method of following the money must involve several parties known as the Anti-Money Laundering Regime. Such parties have significant roles and functions including law enforcement agencies, whistleblowers and other related parties. Presidential Regulation Number 6 of 2012 concerning the National Coordinating Board for the Prevention and Eradication of Money Laundering which has been amended into Presidential Regulation Number 117 of 2016 which is to support efforts to prevent money laundering in Indonesia. This committee has the function to coordinate the prevention and eradication of money laundering.

Using an Anti-Money Laundering approach to complement the conventional approach that has been to eradicate money laundering. The approach has several advantages in uncovering crimes and proving them in court. In order to maintain the stability and integrity of the financial system and assist law enforcement in Indonesia, this must be achieved by establishing PPATK and Anti-Money Laundering.<sup>3</sup>

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<sup>3</sup> Sutarno Bintoro, Sjamsiar Sjamsuddin, Ratih Nur Pratiwi, H. (2020). International cooperation to combat money laundering in the capital market: Indonesia and Australia experience. *Journal of Investment Compliance*.

**In Denmark.** Denmark's Anti-Money Laundering Act defines money laundering as:

1. To unlawfully accept for oneself or others a share in profits or means obtained through the commission of a crime
2. To store, conceal, and assist in unlawful disposal or further serve to secure means or profits obtained through criminal offences
3. Participate or attempt in such actions
4. Arrangements made by anyone who commits offense to where profits or means derive from.

Denmark initiated its first AML law with the Act on Measures to Prevent Money Laundering of 1993 (Hvidvaskloven). This law serves as the initial framework for AML compliance in the country. Hvidvaskloven went ahead with this as a major part of the law on money laundering offences. In Denmark, the Money Laundering Act requires financial institutions to develop and implement risk-based AML/CFT compliance solutions, including appropriate customer due diligence (CDD) and screening measures. Companies should also appoint an AML Officer who is responsible for overseeing their organization's compliance solutions.

Denmark is a member of the European Union and so must transcribe the EU's anti-money laundering directives (AMLD) in domestic legislation. Accordingly, the Danish government updates the Money Laundering Act to meet AMLD requirements, and has done so most recently for the Fourth and Fifth Anti-Money Laundering Directives (4AMLD and 5AMLD). Due to its constitutional agreements with the EU, as of May 2023, Denmark has not implemented the EU's Sixth Anti-Money Laundering Directive (6AMLD). The directive came into effect across the rest of the EU on 3 June 2021.

The crackdown on money laundering took a number of workers in Danish banks. Denmark's six largest banks employ around 4,300 staff and will be tasked with ensuring that banks will not be misused to provide avenues for terrorist financing, money laundering or other financial crimes. The number of such workers will continue to increase for a while and is expected to increase even more in the future. This effort will not only focus on one area or region but will be integrated in several areas to ensure that the bank or related staff in that area

comply with the bank's internal laws and regulations. (FATF, 2019)

Anyone who has converted and transferred money generated directly or indirectly from a criminal offence and concealed its illegal origin, will be punished in accordance with the provisions of section 290 a of the Danish Penal Code. A predicate violation is an error related to tax evasion procedures, and can be a violation of the Danish Penitentiary Code. Corruption, drug trafficking, and other predicate offenses are the most common examples of money laundering. Money laundering acts committed by Danish citizens or persons having permanent residence in Denmark are required to submit to Danish criminal jurisdiction. If for example they commit a criminal offence then based on the law of the country where the act will be committed. Money laundering investigations and prosecutions fall under the purview of the Danish State Attorney for Serious Economic and International Crimes (SØIK).

Money laundering offences will be punishable by fines or imprisonment under the Danish Penal Code. For legal entities, the maximum penalty is a fine. The High Court of

Eastern Denmark (stre Landsret) in 2017 handed the currency exchange office the largest fine to date, totaling DKK 111 million. A fine or imprisonment is the maximum penalty that can be imposed on a person. The financial state of the individual determines the size of the fine, while the turnover of the business at the time of the violation determines the amount of the fine. The length of the prison sentence depends on the severity of the offense. As a main rule, no more than a year and a half. However, the length of the sentence can be increased again to eight years in prison if the offence is very serious.

Penalties for money laundering offences are usually between one and a half to eight years so statutes of limitations range from five to ten years. However, statutes of limitations are always a minimum of ten years for systemically important financial institutions for gross violations committed by the Board of Directors or members of the Executive Board. Only the national level is involved in law enforcement; There is no state or regional law enforcement. In Denmark, neither the management of other banks nor other regulated financial institutions were found guilty of money laundering; There have been many money laundering cases in recent years with the Danske Bank money laundering scandal being the most high-profile case. Money laundering that took place in Estonian bank departments between 2007 and 2015 was the source of the Danske Bank case. The claim is not that Danske Bank itself laundered the money; Instead, the bank allows itself to be used as a tool for large-scale organized money laundering by others through negligence. The case has led to further surveillance actions, parliamentary hearings, and criminal investigations. In addition, claims have been filed against Danske Bank outside Denmark; U.S. and U.S. pension funds have filed claims in Danish courts against Danske Bank and its former CEO, Thomas Borgen, seeking damages for lost investments. (Reuters Staff, 2018)

On the other hand, all banks in Denmark apply the main principle of knowing your customer or referred to as Know Your Customer (KYC). In its implementation, banks must know their respective business relationships between customers and must know the complete identity of customers. Banks are required to know the customer's residence number and obtain other evidence such as the customer's passport or other identities related to the customer. Banks must have extensive and thorough knowledge of all their customers under Denmark's AML Act, which aims to help combat abuse of the financial system. The requirements for new customers may be very complicated, but we can see from the positive side that very deep customer knowledge is very necessary for banks because they will be able to monitor bank customer relationships effectively and can identify activities related to money laundering or terrorist financing.

### **Obstacles to Eradicating Money Laundering in Indonesia**

*First, the increasing number of money laundering cases.* To appear legitimate, criminals now have a number of options to hide the proceeds of their crime. For example, with the development of international banking technology as a result of the expansion of regional banking networks, also known as local networks, which eventually developed into global financial institutions. Criminals involved in money laundering have access to a vast network of services and can allow them to influence money from illegal transactions to become legal in international financial institutions. (Ari Purwadi, 2012) At this time, anything related to money laundering crimes is certain these crimes transcend jurisdictional boundaries, provide a high level of confidentiality, or the use of various financial mechanisms, allowing

money to move through banks, money transmitters, businesses, and even remittances abroad to be treated as net money laundering.

*Second, the limitations imposed by the Center for Financial Transaction Reporting and Analysis (PPATK) in combating financial crime<sup>4</sup>.* There are still difficulties in carrying out the responsibilities and authorities of PPATK, such as:

1. Suspicious Financial Transaction Reports (FSIs) and Cash Financial Transaction Reports (LTKT) from Financial Service Providers (CHDs) are limited sources of information.
2. The Financial Transaction Reporting and Analysis Center (PPATK) is informed of the accuracy of customer data contained in the Financial Transaction Report (LTKM) and Financial Transaction Report (LTKT) Cash;  
The number of interpretations that have differences by academics, Financial Service Providers (CHDs), and law enforcement officials;
  1. Financial Transaction Report and Financial Transaction Report online
  2. Restrictions on the information technology system of Financial Service Providers (CHDs).<sup>5</sup>

*Third, Challenges Faced by the Banking Sector<sup>6</sup>.* Other factors that pose challenges for the banking sector include the following:

- a. It is difficult to determine the true identity of the customer, and applying the basic principle of service use may lead the customer to withdraw funds or avoid banking services because it would be considered a breach of his privacy;
- b. Luring banks into involving their administrations in tax evasion and other criminal activities through the use of fictitious administration client characters.
- c. Because bank employees are less knowledgeable, they are unaware of their role in the fight against illegal tax avoidance programs.
- d. Because there is not enough of an online network, bank information technology must manually report transactions.

*Fourth, Challenges Posed by Investigators in Preventing and Eliminating Money Laundering Crimes If Money Laundering Law Cannot Be Followed Up.* Parties involved in the enforcement process still do not understand some of its provisions that contribute to part of its scope. For example, the mail format for blocking and requesting customer asset information is not standardized, making its implementation often ineffective. We can understand that Indonesia's Financial Transaction Reporting and Analysis Center cannot tackle money laundering and terrorism financing on its own. The President encouraged all parties ranging

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<sup>4</sup> Yoserwan. (2023). Corporate Criminal Liability In Tax Crime : An Effort To Optimize State Revenue From The Tax Sector. *Jurnal Penelitian Hukum De Jure*, 2022, 131–142.

<sup>5</sup> David Ramadhan. (2018). *Law Enforcement Against Perpetrators in the Money Laundering Regime in Indonesia*. University of Andalas.

<sup>6</sup> Shirly, S. (2011). *Comparative Analysis of PPATK (Center for Financial Transaction Analysis Reporting) in Indonesia with FinCEN (Financial Crimes Enforcement Network) in the United States*. University of Indonesia.

from government agencies, the financial industry, to the public to jointly maintain the integrity and stability of the Indonesian economic and financial system. In combating increasingly massive economic crime, the President asked the Indonesian Financial Transaction Reporting and Analysis Center to find legal breakthroughs on various fundamental issues and immediately carry out digital transformation. For example, improving digital services by developing new service platforms and improving existing digital services. Ministries/agencies including Indonesian Financial Transaction Reports and Analysis Center which is the focal point and financial intelligence agency (FIU) can move quickly in dealing with new modes of money laundering and terrorism financing. It is very important to anticipate as early as possible at various levels to prevent efforts that can disrupt the integrity and stability of the economic system and a financial system, and to always anticipate an increase in economic crimes such as cyber crime and other crimes that utilize technological sophistication.

Indonesia is required to comply with the best international regulations and standards applicable as part of the global order of international relations. The FATF, through one recommendation, suggests that each country direct a national risk evaluation. To develop and implement a risk-based approach regime, each country must first identify, evaluate and understand money laundering risks. In addition, these cases require great responsibility and very difficult handling related to the prevention and eradication of money laundering crimes that have not been fully balanced with government measures. To respond to these developments, Indonesia must implement the prevention and eradication of money laundering through strategic risk mitigation innovations.

Struggling in Denmark to tackle laundering crimes that Danish banks are struggling under the weight of regulation, with limited results to prevent money laundering. A new report confirms that financial institutions in Denmark are struggling under the weight of increasing regulatory requirements on anti-money laundering. Efforts have little impact and financial crime continues to grow. Meanwhile, there are increasing concerns about compliance costs and lack of competence. The report AML State of Play, published by FCG, is based on interviews with senior executives at ten big financial institutions in Denmark. It gives a critical view on the current challenges within anti-money laundering and actual progress made since the money laundering scandals in several Nordic banks. According to the report, top challenges include measuring efficiency in transaction monitoring and setting key performance indicators for the overall AML work. This mirrors 2018-2020 data reported by the Danish FSA which state that transaction monitoring, risk assessment and ongoing due diligence, all fundamental parts of an AML-program, remain challenging to financial institutions in Denmark.

## CONCLUSION

Money laundering is difficult to discover, investigate and prosecute, thus allowing vast sums of ill-gotten gains to move through the international financial system without fear of retribution by the wrongdoers. Existing policies in Indonesia for money laundering cases are subject to fines or imprisonment in accordance with the provisions of the article, but in Indonesia it is often not firm in providing punishment to the perpetrators of criminal acts.



Some are not in accordance with the rules that have been applied. So that perpetrators in criminal cases do not feel the deterrent effect and that will later make the crime rate higher in Indonesia. When compared by the Danish state, criminal punishment will be adjusted to the level of crime he has committed. The similarity with the Indonesian state is that it is subject to fines and confinement. Barriers to the Eradication of Money Laundering in Indonesia can occur because the Indonesian Financial Transaction Reporting and Analysis Center is only carried out alone on money laundering cases and is not supported by other parties, even though the level of money laundering crimes is very large from year to year. Therefore, the President encourages all parties ranging from government agencies, the financial industry, to the public to jointly maintain the integrity and stability of the Indonesian economic system and financial system. In preventing increasing economic crime, the President asked the Indonesian Financial Transaction Reporting and Analysis Center to find legal breakthroughs on various fundamental issues and immediately carry out digital transformation.

## REFERENCES

- Andry Triyanto Tjitra. (2023, February). 5 Biggest Money Laundering Crimes in Indonesia, INTRAC Suspect Reaches Rp 183.88 T. *Tempo.Co*.  
<https://bisnis.tempo.co/read/1691688/5-tindak-pidana-pencucian-uang-terbesar-di-indonesia-ppatk-duga-capai-rp-18388-t>
- Ari Purwadi. (2012). Private Banking Services in Banking Institutions as Targets and Means of Money Laundering. *Universitas Wijaya Kusuma Surabaya*, XVII No. 1, 6.
- Arifin, R., & Choirinnisa, S. A. (2019). Corporate Responsibility on Money Laundering Crimes on Indonesian Criminal Law Principle. *Jurnal Mercatoria*, 12(1), 43.  
<https://doi.org/10.31289/mercatoria.v12i1.2349>
- Danske Bank Staff. (2023). *Danish bank posts loss after US money laundering fine*. The Local.  
<https://www.thelocal.com/20230202/danish-bank-posts-loss-after-us-money-laundering-fine/>
- David Ramadhan. (2018). *Law Enforcement Against Perpetrators in the Money Laundering Regime in Indonesia*. University of Andalas.
- FATF. (2019). *Anti-money laundering and counter-terrorist financing in the Danish financial sector Report by Finance Denmark's Anti-Money Laundering Task Force*. November.
- Ginting, Y. P. (2021). Combating Money Laundering with Follow the Money and Follow the Suspect Approach. *Mulawarman Law Review*, 6.
- Iwan Kurniawan. (2013). The Development of Money Laundering and Its Impact on the Economic and Business Sectors. *Jurnal Ilmu Hukum*, 3 Nomor 1, 11.
- Lestari Aprilia. (2021). *Kebijakan Hukum Terhadap Pelaku Tindak Pidana Pencucian Uang*. Universitas Medan Area.
- Muh. Afdal Yanuar. (2019). Discourse between Positions of Money Laundering Offences as a Independent Crime and as a Follow Up Crime After The Decision of the Constitutional Court Number 90/PUU-XIII/2015. *Jurnal Konstitusi*, Volume 16, 10.  
<https://doi.org/DOI:https://doi.org/10.31078/jk164>
- Muladi and Bardad Nawawi Arief. (2015). *Theories and Policies of Criminal Law*. PT. Alumni.

- Muladi and Diah Sulistyani RS. (2015). *Corporate Criminal Liability*. PT. Alumni.
- Ogbeide, H., Thomson, M. E., Gonul, M. S., Pollock, A. C., Bhowmick, S., & Bello, A. U. (2023). The anti-money laundering risk assessment: A probabilistic approach. *Journal of Business Research*, 162(August 2022), 113820. <https://doi.org/10.1016/j.jbusres.2023.113820>
- Reuters Staff. (2018). *How Danske Bank's Estonian money laundering scandal unfolded*. REUTERS. <https://www.reuters.com/article/us-danske-bank-moneylaundering-timeline/timeline-how-danske-banks-estonian-money-laundering-scandal-unfolded-idUSKCN1NO209>
- Shirlsy, S. (2011). *Comparative Analysis of PPATK (Center for Financial Transaction Analysis Reporting) in Indonesia with FinCEN (Financial Crimes Enforcement Network) in the United States*. University of Indonesia.
- Sutan Remy Sjahdeini. (2016). *History, Principles, and Theory of Bankruptcy Law: Understanding Law No. 37 of 2004 concerning Bankruptcy and Suspension of Debt Payment Obligations Second Edition*. Prenadamedia Group.
- Sutarno Bintoro, Sjamsiar Sjamsuddin, Ratih Nur Pratiwi, H. (2020). International cooperation to combat money laundering in the capital market: Indonesia and Australia experience. *Journal of Investment Compliance*.
- Yoserwan. (2023). Corporate Criminal Liability In Tax Crime : An Effort To Optimize State Revenue From The Tax Sector. *Jurnal Penelitian Hukum De Jure*, 2022, 131–142.
- Yunus Husein. (2017). PPATK: Tugas, Wewenang, dan Peranannya Dalam Memberantas Tindak Pidana Pencucian Uang. *Jurnal Hukum Bisnis*, 6, 26.