

# The Principle of Reversal Burden of Proof in Act of Money Laundering in Indonesia

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Money laundering is an extraordinary crime in the Indonesian criminal law. Proof of the occurrence of criminal acts such as money laundering is very difficult, so it requires extraordinary methods. The reverse burden of proof system is one of the methods used by law enforcement officials to ensure the perpetrators of money laundering. This article intends to explain the basis of philosophical considerations and existence of the principle of reverse burden of proof system in money laundering in Indonesia. This paper used a normative juridical research method with library data sources. The approach methods used were the statute and conceptual approach. The basis of philosophical considerations of the reverse burden of proof in accordance with the values of Pancasila as the basis of the Unitary State of the Republic of Indonesia. Regarding the arrangement of the reverse burden of proof system, it is regulated in Article 35 of Law Number 15 of 2002 concerning Money Laundering. The reason for this reverse burden of proof system can be understood as part of efforts to prevent and eradicate money laundering.

**Key words:** *Money laundering, reverse burden of proof, criminal law.*

## Introduction

Conceptually the reversal of burden of proof or "omkering van de bewijslast", or what is known in the Indonesian legal literature as a reverse burden of proof system, can generally be understood as a system that puts the burden of proof on the defendant to prove that he or she is not guilty of the charges indicted against him or her (Elwi Danil, 2008:9) In the event that the defendant fails to prove that he or she is innocent, then he or she is found guilty of a criminal offense. While the public prosecutor is freed from the obligation of proof (*Ibid*).



The crime of money laundering is placed as an offense that is difficult to prove because the eradication also means tackling the crime behind it. This is explained in article 2 paragraph 1 of Law Number 8 of 2010 concerning Prevention and Eradication of Money Laundering Crime, so this is the basis of the government's consideration to give birth to legislative policies in the effort to prevent and eradicate criminal acts of money laundering through Law Number 15 of 2002 concerning Money Laundering in conjunction with Law Number 25 of 2003 concerning Amendments to Law Number 15 of 2002 and Law Number 8 of 2010 concerning Prevention and Eradication of Money Laundering Crime.

The rationale for the birth of the three laws seeks to minimize the greatest impact of money laundering in addition to harming state finance, the use of money from money laundering is possible to finance legal activities and to commit other crimes. These explanations are defined in the integration stage which aims to disguise or eliminate the principle of money proposals so they can be enjoyed or used safely in other businesses. This is the basis for consideration of the implementation of reversed proof of money laundering.

From the various descriptions above, this article will outline the basic philosophical considerations of reverse burden of proof and the existence of a reverse burden of proof verification system in money laundering in Indonesia, making it easier in the field of implementation by understanding the basis of philosophical considerations and the arrangement of reverse burden of proof system in money laundering crime. Therefore, the writing of this article is focused on "The Principle of Reverse Burden of Proof of Money Laundering".

In limiting the discussion, the problem was formulated as follows: First, how is the basis for philosophical considerations in using the principle of reverse burden of proof of money laundering in Indonesia? Second, how is the existence of a reverse burden of proof verification system of money laundering in Indonesia?

### **Literature Review**

The term money laundering was originally from in the United States in the 1930s. The definition of money laundering under the Republic of Indonesia Law Number 8 of 2010 concerning Prevention and Eradication of Money Laundering Crimes is formulated as "all actions that fulfil the elements of criminal offenses in accordance with the provisions in this law"(Yenti Garnasih, 2003:45).

If it is studied in depth, money laundering as a criminal act has three typologies of deeds, first, placement second, separation/layering, and third, integration. These three typologies are usually carried out through the banking sector, non-banking sector, professional facilitator,

insurance sector, the securities industry, by establishing fictitious companies, which aim to disguise the origin of money originating from other activities, so that money laundering is not a pure crime, but a derivative crime from the original crime.

The three typologies mentioned above are basically the stages carried out by money laundering agents to legalize assets acquired from the proceeds of crime. Acts committed by money laundering criminals allows or obscures the true origin of a fund or money resulting from a crime that has been committed and through money laundering, criminal offenders can enjoy and use the results of their criminal acts freely and as if they appear to be the results of legal activities and subsequently further develop the crime (Silitonga, 2017:4).

The use of the principle of reverse burden of proof which is limited to the adjudication stage is motivated by the principle of presumption of innocence known in the criminal justice system in Indonesia, that a person cannot be found guilty before a court ruling that has permanent legal force. When the reverse burden of proof is applied using the principle of presumption of innocence, it means that the defendant has an active role in proof, which is contrary to the principle of presumption of innocence adopted in Indonesia. Normatively this becomes critical thinking that is often raised when a reverse burden of proof system is applied.

If it is observed that in the burden of proof of money laundering in particular, that reverse burden of proof will only be applied at the trial so that the implementation of the principle of presumption of innocence does not apply absolutely. The defendant is active only in proving the origin of wealth. The presumption of innocence is still carried out at the stage of verification before the court stage is carried out by the prosecutor. This situation can be said that money laundering crime uses a criminal procedure while maintaining a negative proof system while at the stage of proof, the origin of the assets from the reverse burden of proof is still used.

When examined from its history in Indonesia, the anti-money laundering regime which aims to control money laundering activities with criminal law instruments, only began in 2002. The background of the birth of this Law is the condition of the nation facing a variety of fundamental problems, including high poverty rates, unemployment which creates socio-economic inequality, as well as weak law enforcement that still does not meet expectations, not only because of the professionalism of law enforcement officials but inadequate legislation.

In these conditions, if money laundering practices are not immediately prevented and eradicated, it is almost certain that the national economy in the future will get worse. Efforts are needed to minimize money laundering because it can destroy human values, undermine

the financial structure and economy, disrupt social life and disrupt the stability of government, so the state needs to act to criminalize money laundering.

Money laundering crimes belong to the classification of serious crimes. This is as confirmed in Brent L Barlett's statement "...damages the financial-sector institution that are critical to economic growth, reduces productivity in the economy's real sector by diverting resources and encouraging crime and corruption, which slow economic growth and can distort the economy's external sector-international trade and capital flows-to detriment of long-term economic development.." (Brent L Barlett, 2002:18). In addition, added by Bosworth Davies, this money laundering can suppress the economy and create a business that is not fair especially if it is carried out by organized crime (R. Bosworth Davies, 1991:30)

If we look at the above description, the crime of money laundering has a very broad impact, which must be immediately prevented and eradicated through regulation in criminal law. Seeing the severity and extent of the effects of money laundering, as well as the inability to prove it, the reverse burden of proof method is one of the efforts to eradicate money laundering.

## **Data**

The reverse burden of proof system is one of the methods used by law enforcement officials to ensnare the perpetrators of money laundering in Indonesia. The basis of philosophical considerations of the principle of reverse burden of proof is in accordance with the values in Pancasila as the basis of the Unitary State of the Republic of Indonesia. The regulation of the reverse verification system in money laundering in Indonesia is regulated through Law Number 15 of 2002 concerning Money Laundering in conjunction with Law Number 25 of 2003 concerning Amendment to Law Number 15 of 2002 and Law Number 8 2010 concerning Prevention and Eradication of Money Laundering Crimes.

## **Method and Result**

This research was done by conducting literature research, or commonly known as the literature study. The author also used the juridical approach method, by studying the basis of philosophical considerations of the principle of reverse burden of proof and the existence of a reverse burden of proof verification system in money laundering in Indonesia. This study used statute approach. Then the next approach used is conceptual approach.



### ***Basis of Philosophical Considerations of Reverse Burden of Proof of Money Laundering In Indonesia***

The basic philosophical considerations are considerations or reasons that illustrate the Money Laundering Law considers the views of life, awareness and ideals of the law which include the atmosphere of mysticism and the philosophy of the Indonesian nation originating from Pancasila and the opening of the 1945 Constitution of the Republic of Indonesia Pancasila is a source of value which is the philosophy of life and the outlook of the Indonesian people.

The use of reverse burden of proof principle is philosophically based on the background that the State provides guarantees for the recognition of the protection of human rights both as individuals and communities in the criminal justice process. The criminal justice process is basically expected to be able to maintain and provide a balance between state power and the protection of individual rights.

The reverse burden of proof is part of the principles of proof. The principle of proof has the purpose of seeking, finding the true according to reality which requires that everyone involved in a criminal case must be considered not guilty before a court ruling states that the person is guilty of a criminal act. This principle is known as the presumption of innocence principle.

The obligation to prove is intended as a basis for examination in the court proceedings in an effort to find material truths that cannot be separated from the role of the principles that apply in proof. These principles aim to find the true truth according to the reality that requires everyone involved in a criminal case must be considered not guilty before a court ruling which states that the mistake is a criminal offense.

The principle of presumption of innocence provides room for proof of being in the government apparatus given the authority, namely the Public Prosecutor. The Public Prosecutor is given the main task and function to indict someone and the public prosecutor must prove or is known as the principle of "actus incumbit onus probandi". In the context of this principle, the defendant is not burdened with the obligation of proof as a manifestation of the presumption of innocence.

Criminal policy in the form of reverse burden of proof is considered to be contradictory to the Criminal Procedure Code (KUHAP), there are several legal aspects that can be used as a basis for consideration of money laundering. The reverse burden of proof principle is not fully enforced, but the space for the application of the principle is quite clearly stated in Article 35 of Law Number 15 of 2002 concerning Money Laundering, Article 35 of Law Number 25 of 2003 concerning Amendment to Law Number 15 2002 concerning Money

Laundering and Article 77 of Law Number 8 of 2010 concerning Prevention and Eradication of Money Laundering Crime.

The reverse burden of proof principle is not a violation of principle, but rather an exception to the principle of legality which is very forced to do. This principle is an exception rule regarding the burden of proof generally putting proof on the Public Prosecutor and putting the burden of proof in the defendant's hand to prove that he/she is not guilty of the crime he/she was charged with. Therefore, the reverse burden of proof principle is not fully implemented even though a person has failed to prove the origin of his/her property which is suspected of being the result of a criminal act, the prosecutor as a public prosecutor has an obligation to prove his/her charges in court proceedings.

While the public prosecutor was released from the obligation of proof (Albert H, 1986:35). The obligation to prove that the legal process is not in accordance with what is appropriate, because the suspect or defendant faced before the court experiences a process of proof by applying the reverse burden of proof principle by legal experts who are believed to be able to overcome or eliminate the level of difficulty evidencing, practice of proof of money laundering.

Through the application of the reverse burden of proof principle, it is believed that the suspect or defendant will not be able or helpless to escape legal proceedings. Law enforcers or public prosecutors are sufficient to declare guilty of committing a crime of money laundering, when a suspect or defendant is unable to prove that his/her assets are obtained legally. It can be concluded that the public prosecutor does not need to do proof conventionally.

In principle, the urgency of regulation and the application of reverse burden of proof refer to KUHAP as the main criminal procedure law in an effort to enforce material criminal law. The burden of proving a criminal offense which was originally on the part of the public prosecutor was shifted into the burden of the defendant. The reverse burden of proof cannot be fully implemented in Indonesia, because this reverse burden of proof regulation is very minimal and has not yet synergized with law enforcement officials.

The very lack of regulation regarding the provision of reverse burden of proof can be found in Article 12 b of Law Number 20 Year 2001 in conjunction with Law Number 31 Year 1999 which basically states that any gratuity to civil servants or state administrators can be considered bribes, if related to his/her position and that which is contrary to his/her obligations and duties, with the provision for the value of gratuity above Rp. 10,000,000, or more, proof that the gratuity is not a bribe, is carried out by the defendant (recipient of gratuity).

This regulation overlaps with the issuance of Law Number 8 of 2010 concerning Prevention and Eradication of Money Laundering Crimes. In the Law, a quo again found in regulation concerning reverse burden of proof, namely in article 77 states: for the purposes of examinations in court, the defendant is obliged to prove that his/her assets are not the proceeds of crime. In Article 69 it is said that investigations, prosecutions and examinations in court proceedings against money laundering are not required to be proven in advance (predicate crime). The important question is how this law could be applied effectively and efficiently, if predicate crime, for example corruption committed before money laundering is absent or not proven.

In reverse burden of proof, the reverse proof method is applied by means of the determination of judges or requests from the public prosecutor to the judge to carry out the reverse proof method. The application of reverse proof in the trial can be carried out based on Article 77 and Article 78 paragraph 1 and 2 of Law Number 2010 concerning Prevention and Eradication of Money Laundering. The article stipulates that the defendant must be able to prove the origin of the funds held, but through the determination of the judge.

The academic text states that the philosophical basis is the life view of the Indonesian nation in the nation and state, namely Pancasila (Naskah Akademis TPPU, 2016:12). The description of the values of Pancasila in the law reflects a justice, order and prosperity desired by the people of Indonesia. The Pancasila formula contained in the preamble of the 1945 Constitution of the Republic of Indonesia (1945 Constitution) consists of 4 paragraphs. The fourth paragraph contains the formulation of State goals and the basis of the State. The basis of the State is Pancasila, while the four main points in the opening of the 1945 Constitution are basically to realize the legal ideas (*rechtsides*) which master the basic laws of the State, both written and unwritten (*Ibid*).

The government's rationale justifies the application of the reverse burden of proof principle as an effort to recover the injustices that occur in the community, for the sake of ease of proof and investigation, which are considered quite relevant as a process of renewing Indonesian criminal law. It cannot be denied that money laundering is not only financially harmful but can be considered as a violation of the social and economic rights of the community at large and money laundering must be considered as a crime that eradicates it must be extraordinary (extraordinary crime), so that it is appropriate in reverse proof.

The use of the reverse proof principle is placed in an effort to balance between two rights, namely individual rights and the rights of all Indonesian people. There is an obligation that lies with policymakers and legislators to establish the right balance between individual interests and the interests of the rights of all people in an effort to uphold the principle of

presumption of innocence which is the basis or starting point of the application of reverse burden of proof principle, where the defendant must prove that assets obtained from legal results must be accounted for.

The return of state finances in criminal law is carried out by investigators by confiscating property belonging to the perpetrators and subsequently by the public prosecutor is required to be seized by the judge. Therefore, it can be concluded that the burden of proof of case fact lies with the public prosecutor, while the burden of proof of guilt is on the defendant, who in practice must be able to achieve the goal of the founding of the Unitary State of the Republic of Indonesia, in paragraph 4: The Indonesian nation and all the bloodshed of Indonesia, advancing public welfare, educating the life of the Nation and participating in carrying out world order based on freedom, eternal peace and social justice ", in an effort to create a just and prosperous society.

### ***Existency of Reverse Burden of Proof System in Money Laundering Crimes in Indonesia***

The reverse burden of proof system that is known in Indonesia today, starts from a system of proof from the State that adheres to the Anglo-Saxon family limited to certain cases, especially to criminal acts of gratification or bribery-related, such as Malaysia and Singapore, which regulate gratification in The Status of Prevention of the Corruption Act Malaysia and Singapore (Lilik Mulyadi, 2011:254). The shifting of the reverse burden of proof starts from the provisions of the Corruption Crime Law, namely Article 5 paragraph (1) of Law Number 24 Prp of 1960 (Law 24/ Prp/1960).

After reverse burden of proof is regulated in Law 24/Prp/1960, starting from Law No. 3 of 1971 concerning Eradication of Corruption Crime also regulates the reverse burden of proof system which is regulated in Article 17. Law Number 31 of 1999, where the regulation of reverse burden of proof is regulated in article 37. Furthermore, in Law Number 20 of 2001 also regulates reverse burden of proof system which is stipulated in article 12B, article 37, article 37A and article 38B. The existence of this reverse burden of proof system is based on the adoption of the evidentiary system provisions adopted in countries belonging to the common law system countries, such as Malaysia and Singapore. This is because the level of corruption is increasingly difficult to prove, so this reverse burden of proof system is recognized as an effort that can facilitate the disclosure of corruption act (David & Mohammed 2016).

The criminalization of money laundering into a criminal act in Indonesia is actually inseparable from international intervention. Beginning with a review conducted by countries that are members of the Financial Action Task Force on Money Laundering (FATF). Indonesia in June 2001 for the first time was included in NCCTs (Non-Cooperative Countries

and Territories). Predicates as NCCTs are given to a country or territory that is deemed unwilling to cooperate in a global effort to combat money laundering crime (Yunus Husein, 2004:1).

Approximately one year after the inclusion of Indonesia as one of the uncooperative countries to prevent and eradicate money laundering by the FATF, finally in 2002 Indonesia enacted Law Number 15 of 2002 concerning Money Laundering. Regarding the arrangement of the reverse burden of proof system, in Law Number 15 of 2002 concerning Money Laundering has also been regulated. This can be seen in article 35 which states:

“For the purposes of examinations in court proceedings, the defendant must prove that his/her Assets are not the result of a criminal act.”

Furthermore, in the explanation of article 35 states:

"This article contains provisions that the defendant is given the opportunity to prove that his/her assets do not originate from a criminal offense. This provision is known as the reverse burden of proof principle”

Seeing the contents of the above article, it is clear that in Law Number 15 of 2002 the proof has adopted a reverse burden of proof system. In 2003, Law Number 15 of 2002 was felt to still have several weaknesses, one of which was not fulfilling international standards. So there needs to be a change or amendment. In the end, in 2003, Law Number 25 of 2003 concerning the Amendment to Law Number 15 of 2002 concerning Money Laundering Criminal Law was issued. Nevertheless, the substance of the regulation relating to the matter of proof has no changes or additions at all.

Furthermore, around seven years passed Law Number 15 of 2002 in conjunction with Law Number 25 of 2003, the implementation has shown a positive direction, however there have been several efforts that have not been implemented optimally, so that a new law arises that is Law Number 8 of 2010 concerning Prevention and Eradication of Money Laundering Crimes. In the substance of regulation relating to verification in Law Number 8 of 2010 there are additional articles governing the reverse burden of proof system. This can be known in:

Article 77 which regulates "For the purposes of examinations in court proceedings, the defendant is obliged to prove that his/her Assets are not the result of a criminal act. Furthermore, in Article 78 "In examinations in court proceedings as referred to in Article 77, the judge instructs the defendant to prove that the Assets related to the case are not originating or related to a crime as referred to in Article 2 paragraph (1). (2) The Defendant

proves that the Assets related to the case do not originate or are related to criminal acts as referred to in Article 2 paragraph (1) by submitting enough proof. "

From the provisions of the articles above, it can be seen that in article 77 of Law Number 8 of 2010 the content of the provision is the same (not different) with Article 35 of Act Number 15 of 2002. However, in the provisions of article 78 of Act Number 8 of 2010 is a new provision in terms of regulating the reverse burden of proof system for the development of the money laundering criminal law. In the contents of the regulation article 78 of Law Number 8 of 2010, it is divided into two verses. First, regulating the judge's order to order to proof of the proceeds of his/her wealth. Second, regulating the proof presented to prove their assets which are not from the proceeds of crime.

Back in Law Number 15 of 2002, the background of the implementation of a reverse burden of proof system in the general explanation of Law Number 15 of 2002, no explanation was found which provided a strong reason why the reverse proof system was applied to money laundering. Likewise, in Law Number 25 of 2003, in general explanation there is no single sentence that can be used as a reference for why the reverse burden of proof system is applied. Because in the general explanation in Law Number 25 of 2003, it only explains that in essence Law Number 15 of 2002 needs to be changed considering the substance of its regulation still does not meet international standards in the prevention and eradication of money laundering crime.

Furthermore, in Law Number 8 of 2010, it can be understood related to the reasons why this reverse proof system can be found implicitly in the general explanation stating: "In the concept of anti-money laundering, the perpetrators and proceeds of criminal acts can be known through a search for subsequent actions, the crime was seized for the state or returned to the rightful person. If assets of proceeds of criminal offenses controlled by perpetrators or organizations of crimes can be confiscated, then they can reduce the crime rate. For this reason, efforts to prevent and eradicate money laundering require a strong legal basis to ensure legal certainty, the effectiveness of law enforcement and the search and return of assets resulting from criminal acts ..."

"...The efforts made were felt to be not optimal, among others because the existing legislation turned out to still provide space for different interpretations to arise, the existence of legal loopholes, inaccurate sanctions, untapped shifts in the burden of proof ... "From the general explanation of the Law Number 8 of 2010 which is a reference to the meaning of the implementation of a reverse burden of proof system for the money laundering is the existence of the phrase "untapped shift of burden of proof". This sentence "untapped shift of burden of proof" shows that this shift of burden of proof (reverse burden of proof system) is applied to achieve a goal that is a benefit.

The ratio of the legist, rather than the purpose of the benefit of regulating the shift in the burden of proof, of course leads to efforts to overcome obstacles in the process of proof. Because in general the application of the system of reversal of the burden of proof by legal experts is believed to be able to eliminate the level of difficulty of proof. This is because money laundering is not a conventional crime, the complex nature of the evidence and the perpetrators also tend to be in the upper-class category or the white-collar crime.

So that the background meaning of the implementation of a reverse burden of proof system in Law Number 8 of 2010, is inseparable from the concept of anti-money laundering activities stipulated by law, namely in the general explanation, which aims to trace and seize assets originating from criminal acts. So, one of the efforts that can be maximized to make it easy to trace and seize assets from the proceeds of crime is the application of a reverse burden of proof system.

The reason for this system of reverse burden of proof of money laundering crimes can be understood as part of efforts to prevent and eradicate money laundering crimes, considering two important things: first, the impact of money laundering has been detrimental to society and the level of complexity and second, the complexity of the modus operandi of money laundering. These two things are strong reasons so that the reverse burden of proof system is one of the efforts of anti-money laundering activities, especially in the process of proving the crime which also aims to trace and seize assets of money laundering. The flow of the approach that the reverse burden of proof system is part of efforts to eradicate and prevent money laundering.

## **Conclusion**

The reverse burden of proof system is one of the methods used by law enforcement officials to ensure the perpetrators of money laundering. The basis of philosophical considerations of the principle of reverse burden of proof is in accordance with the values in Pancasila as the basis of the Unitary State of the Republic of Indonesia. The regulation of the reverse verification system in money laundering in Indonesia is regulated through Law Number 15 of 2002 concerning Money Laundering in conjunction with Law Number 25 of 2003 concerning Amendment to Law Number 15 of 2002 and Law Number 8 2010 concerning Prevention and Eradication of Money Laundering Crimes.

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