



Juridicial Review of Corruption Crimes for Forgery of Bussiness License (Supreme Court Decision Number 44/PID.SUS-TPK/2023/PN.SBY)

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Abstract - This research examines a corruption case involving the falsification of alcoholic beverage business permits, as adjudicated in the Surabaya District Court under Case Number 44/Pid.Sus-TPK/2023/PN. Sby. The study delves into the legal proceedings and evaluates the implications of this case within the broader context of corruption crimes in Indonesia. This research uses a normative juridical and descriptive qualitative approach to analyze related legal norms and their legal and sociological impacts. The main data was obtained from the Surabaya District Court decision and related legal regulations, while the secondary data was from legal literature and other documents. The findings of the research show that the crime of corruption is a crime against humanity which is classified as an extraordinary crime (extra ordinary crimes) where according to the author the most appropriate punishment for corruptors is extraordinary punishment (extra ordinary law). However, the judge's decision in trying the defendant was very low, one of which was the decision that the author analyzed, namely a prison sentence of 2 (two) years and 6 (six) months, with a fine of IDR 50,000,000.00 (fifty million rupiah) subsidiary 6 (six) Months of Confinement. The author conveys to improve law enforcement, the capacity of legal officers, and openness in the legal process.

Keywords: Alcoholic Beverage Business Licenses, Corruption Crimes, Gratuities.

I. INTRODUCTION

Corruption is a pervasive issue that undermines governance, disrupts economic stability, and erodes public trust. It is not limited to public officials but extends to State Civil Apparatus (ASN) who exploit their roles and responsibilities to enrich themselves or others. Alarmingly, even law enforcement personnel are sometimes implicated in corrupt practices, further damaging the integrity of the system. In Indonesia, corruption manifests in various forms, harming state finances, weakening the national economy, and violating the public interest (Hamzah, 1984) Therefore, corruption is an act that detrimentally affects the state both formally and materially. State Civil Apparatus in carrying out their duties, is always required to have integrity in order to carry out their mandate as a servant of the state for the benefit of the community. One form of supervision carried out by ASN as state servants is the supervision of business licenses carried out by the Department of Trade, Cooperatives, and MSMEs. The decision of the Corruption Crimes Court (Tipikor) at the Surabaya District Court, No. 44/Pid.Sus-TPK/2023/PN. Sby, highlights a critical example of corruption within Indonesia's civil service. This case involved an ASN officer, identified as "HLP," S.STP, a Staff Member for Service and Product Supervision at the Trade Office (now under the Surabaya City Cooperatives, MSMEs, and Trade Office). HLP was found guilty of violating Article 9 of the Law of the Republic of Indonesia No. 31 of 1999 concerning the Eradication of Corruption Criminal Acts. This verdict underscores the persistent challenge of corruption at the local

government level and provides valuable insights into the vulnerabilities within bureaucratic oversight systems. By examining this case, stakeholders can better understand the systemic issues enabling corruption and explore more effective prevention and enforcement mechanisms. Which has been changed to Law of the Republic of Indonesia No. 20 of 2001 related to Amendments to Law No. 31 of 1999 related to the Eradication of Corruption Criminal Acts. That the modus operandi carried out by the defendant is as follows:

1. Abuse of authority (abuse of power) owned, so that the authority is used to deceive and move others, be it subordinates or third parties;
2. Taking advantage of the difficulties of business actors who are managing the Alcoholic Beverage Trading Business License (SIUP MB), due to lack of requirements or due to the change (migration) from the Surabaya Single Window (SSW) system to the Online Single Submission (OSS) system;
3. Requesting a sum of money or other facilities from business actors in order to help and facilitate the management of the Alcoholic Beverage Trade Business License (SIUP MB), even though in fact the management of the license is free of charge;
4. Conducting the management of the Alcoholic Beverage Trading Business License (SIUP MB) is not in accordance with the applicable regulations, where basically the Defendant only forges the Alcoholic Beverage Trading Business License (SIUP MB).

The application of articles in the Law on the Eradication of Corruption to a criminal act of corruption has clearly fulfilled its elements, often experiencing mistakes in application from both prosecutors, judges and legal advisors. On the basis of these differences of opinion, the author seeks to conduct a research entitled Juridical Review of Corruption Crimes for Forgery of Business Licenses with a Case Study of Court Decision No. 44/Pid.Sus-TPK/2023/PN. Sby.

II. METHOD

This research employs a qualitative approach, focusing on in-depth data collection to explore events comprehensively. As a descriptive study, it aims to systematically describe the object of study and explain the facts or characteristics of specific populations in the relevant field with accuracy and detail (Azwar, 1998). The descriptive nature of the study supports its objective of providing a thorough depiction of the research object, with the intention of drawing generalizable conclusions (Hadi, 1986). For data collection, the study utilizes a literature review to gather primary, secondary, and tertiary legal materials, including laws, official documents, books, and scientific articles relevant to the research focus. However, a more detailed explanation of how these materials will be selected and analyzed is necessary to clarify the methodological approach. In terms of data analysis, the study incorporates secondary data such as statistical information on corruption cases, records of previous cases, and other relevant data to provide context and support the analysis (Arikunto, 2013)). A more precise articulation of how these data sources will contribute to achieving the research objectives is required to strengthen the methodology.

III. RESULT AND DISCUSSION

3.1 Analysis of the Application of Material Criminal Law to Corruption Crimes Committed by State Civil Apparatus Individuals

1. Corruption Crime

The problem of business practices and corporate crime in Indonesia is a complex problem that affects various aspects of life, including environmental, economic, and social. Some of the problems of business practices and corporate crimes that often occur in Indonesia are Corruption, Money Laundering, and Environmental Crimes that can harm consumers and society, and can damage the image of businesses and corporations in society (Berutu & Rumapea, 2023). Indonesia's law enforcement regulations on corruption cases have lasted for more than 60 years, with the issuance of the Military Ruler Regulation Number PRT/PM/PM/06/1957 to the current positive corruption regulations. (Anjari, 2023). Even in the history of the Indonesian nation. In Law Number 31 of 1999, the definition of corruption is any individual who deliberately violates the law in order to commit an act aimed at enriching himself

or other parties or a business entity that causes losses to state finances or the state economy (Alam, 2017).

Some experts are of the opinion that the Criminal Acts of Corruption are as follows, including:

- a) According to Muyarto, corruption is a political problem rather than an economic one, affecting the government's credibility in the eyes of the younger generation, the educated elite, and workers in general. The consequence of this perception is the reduced support for the government from elite groups at the provincial and district levels.
- b) Syeh Hussin Alatas, stated the definition of corruption, according to him corruption is the subordination of public interests under the needs of individuals including violations of norms, duties, and social prosperity, which are carried out with full secrecy, exclusion, fraud, and ignorance of the consequences. suffered by the community.
- c) Gurnar Myrdar is an inappropriate act that concerns authority, government activities, or certain efforts to obtain an inappropriate position, and other actions such as bribery. (Ali, 2016)
- d) The literal definition of corruption according to John M. Echols and Hassan Shadily, means evil or rotten (Djaja, 2010)
- e) According to A.I.N., Kramer ST defines the word corruption as rotten, damaged or bribeable.

2. The Greedy Theory

According to Jack Bologne, the causes of corruption are greed, opportunity, needs and exposure. In this theory, the potential factor of greed is owned by everyone and is related to the individual perpetrators of corruption. The opportunity factor is related to the condition of an organization, agency or society in such a way that there is an opportunity for someone to act in that situation. The need factor relates to the factors that an individual needs to support a normal life. And, factors related to the consequences and impacts faced by the perpetrator of an event when the perpetrator is known to have committed the event (Elisabeth & Simanjuntak, 2020)

Even though a person does not want to commit corruption, but he has an opportunity, then there is an opportunity for him to engage in corrupt practices. Because it never feels like enough, people have a need to have a normal life or even more than is essential. Everyone has the capacity to be greedy, and corruptors those who engage in corrupt activities are intimately associated with greed. The repercussions that the suspect will experience if they are discovered to have engaged in corruption or irregularities are intimately tied to disclosure or exposure. said that the offended party is tied to the elements of opportunity and discovery, whilst the offender is related to the elements of necessity and greed. (Setiawan, at al 2020)

3. Criminal Law

In Indonesia, criminal cases are handled through a set of legal procedures known as the criminal justice process. Investigation, prosecution, trial, and execution are the primary stages of the procedure, which involves a number of organizations, including the police, prosecutor's office, and courts (Unpri Press, 2023: 44).

In essence, criminal law was formed to provide a sense of security to a person and community organizations when carrying out their daily activities. Several criminal law experts provide definitions of criminal law, including:

- a. According to Simons, criminal law consists of norms that contain obligations and prohibitions that (by the lawmakers) have sanctioned in the form of punishments, which is a special burden. In other words, Criminal law is a system of rules that establishes the conditions and situations under which certain actions are punished, as well as the types of punishment that can be given for those acts. (Lamintang, 2013)
- b. W.F.C. Van Hattum stated that criminal law is a system consisting of principles and regulations followed by the state or other common law societies, where the state as the enforcer of public law has restricted acts that are contrary to the law and linked

violations of its regulations with consequences in the form of punishment. (Lamintang, 2013).

- c. Hazewinkel-Suringa stated that criminal law is a collection of legal rules that include prohibitions, orders, or obligations that, if violated, will lead to the imposition of punishment (legal sanctions) to the violator(Hamzah, 1991).
- d. Moeljatno explained that criminal law is part of the entire legal system that applies in a country, which regulates principles and regulations to: (1) determine prohibited acts and are threatened with certain threats or criminal sanctions for anyone who violates the prohibition; (2) determining when and under what circumstances criminal sanctions may be imposed on violators of these prohibitions; (3) regulating the procedure for implementing criminal sanctions when a person is suspected of violating the prohibition.Hukum Pidana Materil

4. Material Criminal Law

Material criminal law is criminal law that focuses on the part or subject of a criminal act. The following are expert opinions on material criminal law, as follows::

- a) Eddy O.S. Hiariej stated that material criminal law is a criminal law that concerns rules that regulate prohibited acts with criminal threats for anyone who violates them(Hiariej, 2016).
- b) According to Tami Rusli, the material criminal law contains rules that stipulate punishable acts, conditions for imposing punishments, and provisions regarding the type of punishment imposed. (Rusli, 2017)

Based on the two expert opinions above, it can be seen that material criminal law is a formulation of rules and provisions concerning legal acts that can be punished and how the provisions are in imposing the penalty.

5. State Civil Apparatus (ASN)

State Civil Apparatus or ASN is an employee who, both at the central and regional levels. ASN is appointed to carry out government administrative tasks and receive salaries in accordance with applicable laws and regulations. In the analysis of the research's topic, the legal foundation for the government's implementation is, as follows:

- 1) Law Number 5 of 2014 related to the State Civil Apparatus;
- 2) Law Number 23 of 2014 related to Regional Government.
- 3) Government Regulation Number 11 of 2017 related to Civil Servant Management;
- 4) Government Regulation No. 53 of 2010 related to Civil Servant Discipline;
- 5) Government Regulation number 30 of 2019 related to Civil Servant Performance Assessment.

Based on According to Law Number 5 of 2014, which deals with the State Civil Apparatus, ASN is a profession for government employees with employment agreements (PPPK) and civil servants (PNS) who work for government organizations. based on the Civil Servant Performance Assessment Regulation Number 30 of 2019 of the Government. It was clarified that it is well recognized that the State Civil Apparatus's (ASN) role, including all of its operations and areas of responsibility, necessitates effective monitoring; in other words, an activity has been carried out. This is to guarantee that their duties in providing services are carried out in accordance with applicable regulations(Saputra et al., 2021)

6. State Financial Losses

All state assets, whether or not they are divided, including all state wealth and all rights arising from the Second Revision of Law No. 30 of 2002 concerning the Corruption Eradication Commission, are referred to as state finance as stated in the explanation section of Law No. 19 of 2019 the following:

- a) Being governed, overseen, and accountable by officials from State Institutions, both nationally and regionally;

- b) Owning shares in state-owned or regionally-owned businesses, foundations, legal entities, and businesses that use outside funding in accordance with agreements with the government.

The criminal acts regulated by this article are the main form of criminal acts of corruption. The provisions of Law Number 30 of 2002 related to the Corruption Eradication Commission state that elements that violate the law do not require other elements. Meanwhile, in determining the important element/core part (*bestanddelen*) is determined based on the third element. This is necessary because the definition of authority is the scope (domain) of state administrative law. Misuse of state finances that cause losses in state finances in large nominal amounts is generally in the form of criminal acts of corruption. Criminal acts of corruption are very detrimental because they can hinder national development. Even so, in determining the loss of state finances related to criminal acts of corruption, it has a fairly broad dimension, because the punishment for actual losses cannot overcome losses in the future.

3.2 Juridical Analysis of Material Crimes Against Corruption Crimes Committed by ASN Individuals in Decision Number 44/Pid.Sus-TPK/2023/PN. Sby

The following will be explained by the author about the meaning of juridical analysis, the factors that cause corruption, and the meaning of business licenses and business licenses, as follows:

1. Juridical Analysis

Etymologically, the English term analysis is derived from the ancient Greek word *ἀνάλυσις*, which means analytical. "Ana" means to return, and "luein" means to let go or decompose. These two syllables make up the word analysis. The word has a different connotation when combined. The term "juridical" refers to any rule that is deemed legitimate or that, in the eyes of the law, can be accepted for its validity. This includes rules, ethics, conventions, and even morality that serve as the foundation for decisions. The process of solving the elements of an issue that need closer examination and then connecting them to the law, legal regulations, and relevant legal standards in order to solve the problem is known as juridical analysis or problems. The purpose of juridical analysis activities is to form a mindset in solving a legal problem (Soekanto, 2013)

2. Factors Causing Corruption

Corruption is an extra ordinary crime because its impact is difficult to repair. Efforts to eradicate corruption, which are divided into enforcement and prevention, will not achieve maximum results if only carried out by the government without involving the active participation of the community and the community, including the State Civil Apparatus which is an important part that is expected to be actively involved in corruption efforts in Indonesia. (Riwukore, 2022). Generally, the offense of a person committing corruption is the problem of poverty that is used as a justification for the act of acquiring wealth that should not be or referred to as an act of corruption. Wiryawan stated that the cause of corruption that often occurs in Indonesia is because people think that if wealth is obtained, the person can be said to be successful (Setiawan, 2016).

Therefore, a person will do everything possible to obtain such wealth, including through harmful corruption. Weak religious, moral, and ethical education is also another cause that results in corruption in society. According to Setiawan, corrupt and colluding behavior among the Indonesian bureaucracy has developed far beyond its ideal function. Setiawan described that almost 70 percent of the regional budget is allocated for employee spending and government operations. Bureaucracy is also an important cause of the high-cost economy that afflicts the business world and the economy.

3.3 Basis for Judge's Consideration in Deciding Judicial Decision 44/Pid.Sus-TPK/2023/PN. Sby

The judge is the person responsible for producing a decision with permanent legal force on behalf of the court. Judges are expected to produce decisions that do not cause problems in the community, because judges are officials who have the authority to do justice

in a court. The verdict born by the judge is a reflection of the birth of credibility that can be trusted by the community. The judge must be able to determine whether or not a fact conveyed to him is true or not and subsequently be able to make or determine the law, In particular, to decide a case, the judge must go through three stages, namely:

- 1) Seeing the truth of the events that really happened in accordance with the letter of gask which then the event was proven and produced a concrete event.
- 2) Assessing concrete events to be used as legal events.
- 3) After a legal event occurs, then the hakim issues a verdict or gives the punishment or gives its rights to the right. (Adawiyah et al., 2023)

Based on the juridical review above, the author will explain the judge's considerations in deciding on the Judicial Decision Decision 44 /Pid.Sus-TPK/2023/PN. Sby, which the author will divide into several main points based on the reasons submitted by the prosecutor/public prosecutor's cassation applicant, as follows:

1. Judge's Consideration

- a) According to Article 9 of Law of the Republic of Indonesia Number 31 of 1999 regarding the Prevention and Elimination of Corruption Criminal Procedure, as amended by Law of the Republic of Indonesia, Number twenty of 2001 related to Amendments to Law Number 31 of 1999 related to the Eradication of Corruption Crimes, the defendant was subject to criminal penalties and regulations for willfully falsifying books and lists for administrative examinations or for being a civil servant or someone other than a civil servant who is assigned to perform a public duty continuously or temporarily, the judge said in the First Indictment;
- b) The Judge imposes a penalty on the Defendant in the form of a fine of Rp. 50,000,000.00 (fifty million rupiah), which is equivalent to six months of confinement, and a sentence of two years and six months in jail, less the time the Defendant has been ordered to stay in custody, the decision is very far from the rules of the law that have been set, because the judge did not consider philosophical reasons and mistakes in considering the public prosecutor's demands.
- c) Aggravating and Mitigating Matters
 - 1) Aggravating Matters, the defendant's actions are not in the eradication of corruption by obtaining an alcohol trading business license with case evidence of 37 types of evidence in the form of copies of correspondence
 - 2) Mitigating Matters
 - a) The defendant has never been convicted;
 - b) The defendant behaves politely during the trial;
 - c) The defendant has family dependents; and
 - d) The defendant admits and regrets his actions

After examining everything that was revealed at the trial, the panel of judges deliberated, then a decision was taken stating that the defendant was legally and convincingly proven to have committed the crime of corruption in the forgery of an alcoholic beverage business license as contained in the Surabaya District Court's decision on criminal action Number 44 / Pid.Sus-TPK / 2023 / PN. Sby.

Based on the information of the decision above, in imposing criminal action Number 44 / Pid.Sus-TPK / 2023 / PN. Judge Sby used juridical and sociological considerations in imposing the sentence. What is meant by juridical considerations are legal facts found in the trial such as the indictment of the public prosecutor, the description of witnesses, the description of experts, evidence and the defendant's statement as contained in the law. In addition, to make a decision, the judge must also consider the elements of the article charged against the defendant. Meanwhile, what is meant in sociological considerations is incriminating and mitigating matters that aggravate and mitigate the defendant in exposing criminal acts and when undergoing the trial process.

The author observes the inconsistency of facts and reality that occurs from the prosecutor's demands with the judge's decision, including:

1. Inconsistency of Judge's Consideration in Imposing a Criminal Sentence

As with the crime of corruption, it is not only the issue of state losses that are listed in incriminating matters. But it also has a great impact on state revenue for alcoholic beverage excise that is not maximized so that the state's goal to achieve welfare is not appropriate and the defendant's actions can also damage public trust, in regulating the circulation of alcoholic beverages. As stated in Article 12B of Law 20/2001 which states that any gratuity against civil servants or state administrators is considered to be bribery if it is related to their position and is contrary to their obligations and duties, with the following provisions:

- a. with a value of IDR 10 million or more, proving that the gratuity is not a bribe made by the recipient of the gratuity;
- b. whose value is less than Rp10 million, proving that the gratuity was a bribe carried out by the public prosecutor.

The criminal penalties for civil servants or state administrators who meet the above criteria are life imprisonment and imprisonment for a minimum of 4 years and a maximum of 20 years, as well as a fine of at least IDR 200 million and a maximum of IDR 1 billion. Meanwhile, the judge only sentenced the defendant to imprisonment for 2 (two) years and 6 (six) months minus the period of detention that had been passed by the defendant with an order for the defendant to remain in custody and a fine of Rp.50,000,000.00 (fifty million rupiah) subsidy of 6 (six) months of confinement.

2. Judge's Mistake in Considering the Public Prosecutor's Demands

Based on his background in office, the defendant is a service and product supervision ASN staff at the Trade Office (now the Cooperatives, MSMEs and Trade Office) of Surabaya City where as a supervisor and servant of the residents does not set a good example, by committing very despicable acts such as corruption. In addition, the judge also did not consider the philosophical reason where corruption is a criminal offense, crimes against humanity are classified as extra ordinary crimes, which according to the author, the most appropriate punishment for corruptors is an extra ordinary law. But in fact, the punishment for corruptors is dominated by the maximum punishment applicable to the Law so that the author considers that the punishment for corruptors is very low, one of which is in the verdict that the author analyzes, namely a prison sentence of 2 (two) years and 6 (six) months, with a fine of Rp.50,000,000.00 (fifty million rupiah) subsidiary of 6 (six) months of confinement, so that it does not cause a sense of deterrence against corruptors. So the author hopes that in the future the punishment for corruptors will be stricter in accordance with the Corruption Crime which is special and considered to be classified as an extraordinary crime.

IV. CONCLUSION

The defendant was proven guilty as a public servant or a person other than a public servant who is given the task of carrying out a public office continuously or temporarily, intentionally falsifying books and lists specifically for administrative examination. This is in accordance with Article 9 of the Law of the Republic of Indonesia Number 31 of 1999 concerning the Eradication of Corruption, as amended by Law Number 20 of 2001. The evidence clearly demonstrated that the defendant falsified administrative records to facilitate corrupt practices. To enhance clarity, legal references should be used sparingly and focus on the essential reasoning and evidence that established the defendant's guilt. The judge sentenced the defendant to imprisonment for 2 (two) years and 6 (six) months, with the duration reduced by the period already served in detention. Additionally, the defendant was fined Rp.50,000,000.00 (fifty million rupiah) or, in lieu of payment, an additional 6 (six) months of confinement. However, the judicial decision failed to adequately address the extraordinary nature of the crime. The judge did not treat this case as a crime against humanity, which, under Indonesian law, is considered an extraordinary crime and warrants stricter punishment. Furthermore, the penalty imposed does not reflect the severity of the defendant's actions or their position of trust as a public servant. The judge's oversight in this regard undermines the deterrent effect necessary to combat corruption.

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