




# Special Protection For Whistleblowers In Disclosing Money Laundering In Indonesia

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## Abstract

**Introduction:** A suspected criminal act of money laundering or a person who is designated as a witness in the process of examining a criminal act of laundering is obliged to obtain protection from the state.

**Purposes of the Research:** This paper aims to find out the criminal law aspects of reporting Money Laundering where in fact someone as a reporter usually turns into a suspect so that this paper gives the spirit and courage of the community as a reporter because it is protected by state law.

**Method Of The Research:** The type of research is normative juridical with analysis using legal documents in the form of primary legal materials, secondary legal materials, and tertiary legal materials.

**Results of the Research :** Reporting of suspected money laundering or a person who is designated as a witness in the process of investigating a laundering crime is mandatory to obtain protection from the state. The protection given to reporters and witnesses is given in two forms, namely legal protection and special protection.

## 1. INTRODUCTION

Legal protection for every citizen is a constitutional right that must be obtained and must be granted by the state. The constitutional right of citizens to obtain legal protection can be seen in the provisions of Article 28D paragraph (1) and Article 28g paragraph (1), which in principle determine the obligation of the state to provide guarantees of legal protection to every citizen without discrimination.<sup>1</sup> Law essentially serves as a means to protect the various interests of individuals in society, in addition to various other functions contained in law. In realizing the function of the law to provide protection against various public interests, the implementation of the law must be executed by authorized institutions and/or law enforcement agencies.<sup>2</sup>

One of the efforts made by the state in order to realize legal protection for every citizen is to carry out honest and fair law enforcement, including the efforts of the state to and

<sup>1</sup> Janpatar Simamora, Tafsir Makna Negara Hukum Perspektif Undang-Undang Negara Republik Indonesia Tahun 1945, *Dinamika Hukum*, 14 no. 3, 2014, p. 548-560 lihat juga Ariman Sitompul, Firman Halawa, Sabela Gayo, *Hukum Pencucian Uang Kajian Teori, Praktek dan Perkembangannya*, Malang: Mazda Media, 2020, pp. 130

<sup>2</sup> Siti Threde Herawati Halawa dkk, Perlindungan Hukum Terdakwa Dalam Proses Persidangan, *Legalitas*, 14, no.2, 2022, p. 241-242

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overcome the occurrence of money laundering (money laundering) which has such a big impact on the economy of a nation and state.<sup>3</sup> Money laundering comes from English then translated in Indonesia as money laundering, which is categorized as a crime, whether it is committed by a legal entity (corporation) or an individual. Adrian Sutedi in his book entitled *Money Laundering*, reveals that: the term money laundering has been known since 1930 in the United States, namely when the mafia bought a legitimate and official company as one of its strategies. The biggest investment was a laundry company or so-called laundromats which when it was famous in the United States. This clothing laundering business then developed and various proceeds of crime such as money from other branches of business were invested into this clothing laundering company, such as money from illegal liquor, gambling and prostitution.

Law enforcement against money laundering currently refers to the provisions of Law No. 8 of 2010 on the Prevention and Eradication of money laundering (law no. 8/2010 on PP-TPPU). The provisions of this law become the legal basis (umbrella law) for law enforcement in preventing and combating money laundering. Chapter I General Provisions of Law No. 8/2010 on TPPU, namely in Article 1 Number 1 mentions the definition of money laundering as any act that meets the elements of a criminal offense in accordance with the provisions of this law. Acts that are included as money laundering are acts that have been formulated in Article 3, Article 4, and Article 5 of Law No. 8/2010 about TPPU. However, the provisions of these articles have been revoked after the promulgation of Law Number 1 of 2023 concerning the Criminal Law Code (Law no. 1/2023 on the Criminal Code)

The provisions of Articles 3, 4, 5 are then regulated in Article 607 paragraph (1) of Law No. 1/2023 on the Criminal Code, which determines the crime of money laundering is any person who: a) Placing, Transferring, Transferring, Spending, Paying, Giving, Depositing, Carrying Abroad, Changing The Form, Exchanging For Currency Or Securities Or Other Acts On Property That He Knows Or Should Suspect Is The Result Of A Criminal Offense With The Aim Of Concealing Or Disguising The Origin Of Property, Shall Be Punished With Imprisonment For A Maximum Of 15 (Fifteen) Years And A Maximum Fine Of Category VII; b) Concealing Or Disguising The Origin, Source, Location, Designation, Transfer Of Rights, Or Actual Ownership Of Property That He Knows Or Reasonably Suspects Is The Result Of A Criminal Offense, Shall Be Punished With A Maximum Imprisonment Of 15 (Fifteen) Years And A Maximum Fine Of Category VI; c) Receiving Or Mastering The Placement, Transfer, Payment, Grant, Donation, Custody, Exchange, Or Use Of Property That He Knows Or Reasonably Suspects Is The Result Of A Criminal Offense, Shall Be Punished With A Maximum Imprisonment Of 5 (Five) Years And A Maximum Fine Of Category VI.

In the provisions of Article 608 of Law No. 1/2023 concerning the Criminal Code states that " " the provisions as meant in Article 607 paragraph (1) letter c do not apply to reporting parties who carry out reporting obligations as stipulated in law no. 8/2010 about TPPU." The above provisions regulate the exclusion of punishment against "reporters" who carry out reporting obligations as stipulated in law No. 8/2010 about TPPU. In Article 17 paragraph (1) of Law No. 8/2010 on TPPU has determined who is categorized as a whistleblower, so not all whistleblowers who report suspected money laundering are

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<sup>3</sup> Iwan Kurniawan, *Perkembangan Tindak Pidana Pencucian Uang (Money Laundering) dan Dampaknya Terhadap Sektor Ekonomi Bisnis*, *Jurnal Ilmu Hukum*, 3, no. 1, 20027, p.4-5

included as whistleblowers, so they get exceptions as intended in Article 608 of law no. 1/2023 of the Criminal Code. Parties that are categorized as "whistleblowers" and get exceptions have been determined limitatively in Law No. 8 of 2010 on Money Laundering (Law no. 8/2010 on TPPU). Limitative arrangements regarding the reporting party in law No. 8/2010 on TPPU, due to the characteristics of laundering crimes tend to use institutions that provide financial services and providers of goods and services, especially Bank institutions as companies engaged in the financial services sector.<sup>4</sup> Money laundering is a systematic and organized crime, money laundering is carried out by people who control the world of financial service providers, both banks and nonbank criminal acts as referred to in Article 2 Paragraph (1) of law no. 8/2010 about TPPU. Therefore, in an effort to prevent and uncover laundering, the PPATK institution was formed, whose main function is to receive reports from financial service providers (CHD) and goods and services providers (PBJ) for any suspicious transactions.<sup>5</sup>

## 2. METHOD

This study is a normative juridical research, which is supported by empirical research, which looks at the protection of whistleblowers in law enforcement of money laundering. While in terms of its nature, this study is prescriptive, which is a study that aims to study the purpose of law, the values of justice, legal validity, legal concepts and legal norms.<sup>6</sup> Descriptive research is a study that aims to provide an overview of the problem in accordance with the circumstances or facts. Judging from its nature, this study is a normative juridical research. Normative legal research is research conducted by researching library materials (secondary data) or library legal research. Judging by the purpose, this study belongs to the normative type of legal research. Normative research includes research on the principles of law, legal Systematics, inventory of positive law, basic philosophy (dogma or dotrin) of positive law.<sup>7</sup>

## 3. RESULTS AND DISCUSSION

According to sutan remy, money laundering is a series of activities that are processes carried out by a person or organization against illicit money, namely money derived from crime with the intention of hiding or disguising the origin of the money from the government or authorities authorized to act against criminal acts by primarily entering the

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<sup>4</sup> Sinar, Muhammad Syukri Akub, Abdul Azis, *Perlindungan Terhadap Saksi Pelapor Dalam Tindak Pidana Korupsi*, Jurnal Amanna Gappa, 28 no. 2, 2020, p.101-114 lihat juga Barbara Vettori, *Tough on Criminal Wealth Exploring the Practice of Proceeds from Crime Confiscation in the EU*, Doordrecht: Springer, 2006, p. 8-11.

<sup>5</sup> Ariman Sitompul, Pagar Hasibuan, M. Sahnun, *The Morality Of Law Enforcement Agencies (Police, Prosecutor's Office, KPK) In Money Laundering With The Origin Of The Corruption*, *European Law Review*, 9, no. 10, 2021 pp. 55-63, lihat juga Ariman Sitompul, M. Nasir Sitompul, *The Combination Of Money Laundering Crime With The Origin Of Narkotics Crime To Islamic Law*. In *Proceeding International Seminar of Islamic Studies*, Vol. 1, No. 1, 2020, p.673

<sup>6</sup> Benuf, Kornelius., & Azhar, Muhamad, *Metodologi Penelitian Hukum Sebagai Instrumen Mengurai Permasalahan Hukum Kontemporer*. Gema Keadilan, Vol.7, No.1,2020, p.20-33. Lihat juga Ariman Sitompul, *Metode Penelitian Hukum Normatif*, Yogyakarta: Mazda Media, 2022 p. 106.

<sup>7</sup> Johny Ibrahim, *Teori dan Metodologi Penelitian Hukum Normatif* (Malang: Bayumedia Publishing, 2011, p. 57; Bandingkan jugadengan Ediwarman, *Monograf Metodologi Penelitian Hukum* Yogyakarta: Genta Publishing, 2016, p. 69; Lihat juga Fitriah Faisal, Amir Faisal, dan Endah Widyastuti, "Pengaruh Metode Economic Analysis of Law dalam Perkembangan Kebijakan Pencegahan Tindak Pidana Pencucian Uang Economic Analysis of Law Method and Its Effect on the Development of Prevention Policy of Money Laundering" 6, No. 1 2022: p. 82-92.

money into the financial system so that the money can then be removed from the financial system as lawful money.<sup>8</sup> The anti-money laundering regime (APU), financial service providers (CHD) and goods and services providers (PBJ) have an obligation to report any suspicious financial transactions to PPATK in order to prevent money laundering practices. According to Article 17 of Law No. 8/2010 about tppu, the reporting party includes financial service providers (CHD) and providers of goods and services (PJB).<sup>9</sup>

Financial service providers according to Article 23 of Law No. 8/2010 on TPPU obliged to report any suspicious financial transactions, cash transactions in the amount of at least Rp. 500,000,000 (five hundred million rupiah), and financial transactions transfer of funds from and abroad. Similarly, the provider of goods and services, also has an obligation to report to PPATK on transactions either in rupiah or foreign currency, if the transaction value is equivalent to the amount of Rp. 500,000,000 (five hundred million rupiah). The existence of an obligation to report any suspicious financial transactions by financial service providers and providers of goods and services, the law provides for the exclusion of punishment against whistleblowers from the provisions of Article 607 letters A, b, and c as mentioned in Article 608 of law no.1/2023, which is a form of legal protection provided by law against whistleblowers.

Government regulation of the Republic of Indonesia number 43 of 2015 concerning reporting parties in the Prevention and Eradication of money laundering as revised by government regulation of the Republic of Indonesia number 61 of 2021 concerning amendments to government regulation of the Republic of Indonesia number 43 of 2015 concerning reporting parties in the Prevention and Eradication of money laundering (hereinafter referred to as PP No. 62/2021), reporting parties other than financial service providers and providers of goods and services provided for in Article 2, also include: advocates, notaries, land deed officials, Public Accountants, and financial planners.<sup>10</sup>

In elucidation of Article 83 paragraph (1) of Law No. 8/2010 on TPPU explained about who is meant by "Rapporteur", "IE" any person in good faith and voluntarily submit a report of alleged money laundering". Furthermore, Article 84 emphasizes that everyone who reports the occurrence of suspected TPPU is "obliged" to be given special protection by the state from possible threats that endanger themselves, their lives, and /or property, including their families.

UU No. 8/2010 on TPPU, financial service providers (CHD) and goods and services providers (PBJ) in carrying out their business activities have an obligation to report any suspicious financial transactions by applying the principle of recognizing service users. In the financial services sector, the principle of service users is called the principle of recognizing nasabah. This principle is applied when: a) Conducting business relationships with service users; b) There are financial transactions with rupiah and / or foreign currencies whose value is at least or equivalent to Rp. 100.000.000, - (one hundred million rupiah); c) There are suspicious financial transactions related to money laundering and

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<sup>8</sup> Sumadi, Telaah Kasus Pencucian Uang Dalam Tinjauan Ekonomi Syariah, *Jurnal Ilmiah Ekonomi Islam* 3, no.3, 2017, p 188.

<sup>9</sup> Fitriyana, Pertanggungjawaban Partai Politik Dalam Tindak Pidana Pencucian Uang. *Jurist Diction*, 2, no.4 , 2019, p.1319- 1337 lihat juga Theodore S. Greenberg, Linda M. Samuel, Wingate Grand, and Larissa Gray, Stolen Asset Recovery, A Good Practices Guide for Non-Conviction Based Asset Forfeiture, Washington D.C.: The World Bank & UNODC, 2009, pp. 18.

<sup>10</sup> Susato, Penafsiran Asas Manfaat Tentang Asset Recovery Korban Tindak Pidana Pencucian Uang. *Jurnal Yudisial*, 13, no. 1, 2020, p.89-105

terrorism financing; or d) The reporting party doubts the veracity of the information reported by service users.

The obligation of financial service providers and providers of goods and services to report any suspicious financial transactions and apply the principle of recognizing service users (customers) is an effort to prevent money laundering. However, the regulation on the obligation to report suspicious financial transactions by financial service providers and providers of goods and services to PPATK in law no.8/2010 on TPPPU still seems to be formulated half-heartedly. This is because the sanctions threatened against violations committed by the CHD of these obligations are only threatened with administrative sanctions. As a result, these obligations by the Bank are not implemented optimally, which ultimately leads to ineffective efforts to prevent and eradicate money laundering by law enforcement.<sup>11</sup>

Specifically regarding the reporting obligations by financial service providers, especially banks, which are closely related to the principles of maintaining Bank secrecy regulated in law no. 10/1998 on Banking and the obligation of banks to provide information as stipulated in Article 41, article 41A and Article 42. From the provisions of the obligation to provide information as stipulated in Article 41, article 41A, and Article 42 of Law No. 10/1998 on banking, there is no provision that regulates the bank's obligation to report suspicious financial transactions. So that the obligation of the Bank as a financial service provider to report suspicious financial transactions to PPATK is not understood as an absolute obligation that must be carried out by the Bank as a PJK in an effort to prevent and eradicate money laundering.<sup>12</sup>

In addition, in Article 444 of Law No. 1/2023 of the Criminal Code there is a ban on disclosing information that a person is obliged to keep secret where he works. The editorial article 444 of Law No. 444 U.S. no. 1/2023 of the Criminal Code reads as follows: "Any person who tells a special thing about a company where he works or has worked that he must keep secret, shall be punished with a maximum imprisonment of 2 (two) years or a maximum fine of Category III." Although in the explanation of Article 444 of Law No.1/2023 concerning the Criminal Code explains that the provisions of this article are intended to prevent unfair business competition in the business world, but the formulation of this article may be in contradiction with the obligations of companies, especially banking institutions in submitting reports related to customer data that conduct suspicious financial transactions that indicate money laundering.

Criminal law enforcement, especially in uncovering criminal acts that occur in the community by law enforcement, especially by police investigators as the first gate in criminal law enforcement is carried out based on 2 (two) ways, namely reports from the community and being caught. Especially in revealing certain crimes, such as money laundering, it is necessary to have reports from people who know that there has been a money laundering crime.

Criminal law enforcement is the embodiment of the functions and roles of law enforcement agencies incorporated in the criminal justice system. In other words, criminal

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<sup>11</sup> Ariman Sitompul, *Perampasan Aset Hasil Tindak Pidana Pencucian Uang Dengan Asal Pidana Korupsi (Kajian Dalam Perspektif Hukum Islam)*, Malang: Mazda Media, 2020, p. 20-25

<sup>12</sup> Tumiwa, Adrian F, Tindak Pidana Pencucian Uang Dalam Pespektif Undang- Undang No. 8 Tahun 2010 Tentang Pencegahan dan Pemberantasan Tindak Pidana Pencucian Uang. *Jurnal Lex Crimen*, 7, no. 2, 2018, p.74-80

law enforcement is the work of the criminal justice system. The criminal justice system is a crime control system consisting of the police, prosecutors, courts and correctional institutions of convicts. The criminal justice system as the executor of the rule of law must be able to enforce criminal law by revealing various events or criminal acts that occur in society for the sake of creating order and security.<sup>13</sup>

The practice of criminal law enforcement in reporting witnesses is known as a whistleblower witness, which is someone who provides information to the public about a violation of the law or a criminal act. In addition to the whistleblower, the development of criminal justice also recognizes the presence of the perpetrator witness (justice collaborator), which is a criminal offender who works with law enforcement to uncover a criminal offense.

According to the Oxford Advanced Learner's Dictionary, a "whistleblower" is a person who informs people in authority or the public that the company they work for is doing something wrong or illegal. Whistleblower can also be interpreted as a report submitted by a person, in which a person who works in a particular organization reports irregularities or violations of hukum that occur in his organization. (whistleblowers are individuals who report unethical practices by their employers to outsiders).

A Whistleblower is a report that is important in the fight against economic crime submitted by a person. Therefore, the existence of whistleblowers will always be seen as a threat to organizations/companies or even perpetrators of crimes. Whistleblower is a party that can provide information about various irregularities committed by a company/ public organization, where the whistleblower will be an accurate source of information for law enforcement in revealing a criminal offense, including money laundering. So this whistleblower does not only cover criminal (criminal) issues, but also covers a wider field. In practice, there is a difference between whistleblowers and informants. In this case, the definition of whistleblower must be understood more broadly than just a reporter or informant. If they provide information without being identified (anonymous), they are referred to as informants. Meanwhile, if his identity is known, he is referred to as a reporter, as with the categories in the Criminal Procedure Code or other legislation in Indonesia, for example in the witness and Victim Protection Law.<sup>14</sup> The importance of the existence of "whistleblowers" in preventing money laundering and "witnesses" in proving that laundering has occurred in the process of evidence at trial, of course, must be directly proportional to the protection provided by the state to whistleblowers and witnesses.

Normatively, the provisions regarding the protection of witnesses have been regulated in Law No. 31 of 2014 concerning amendments to Law No. 13 of 2006 concerning the protection of witnesses and victims (hereinafter referred to as law no. 31/2014 on prostitutes), which several articles in the law have been revoked by the promulgation of Law No.1/2023 of the Criminal Code. According to Article 1 Number 1 of Law No. 31/2014 concerning prostitutes, defines a witness as a person who can provide information for the sake of Investigation, investigation, prosecution, and examination in a court hearing about

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<sup>13</sup> Yanuar, Muh. A, Diskursus Antara Kedudukan Delik Pencucian Uang Sebagai Independent Crime Dengan Sebagai Follow Up Crime Pasca Putusan MK Nomor 90/PUU-XIII/2015. *Jurnal Konstitusi*, Vol.16, No.4,2019, p.721-739

<sup>14</sup> Verri Octavian, Perlindungan Hukum Bagi Pengungkap Fakta (*Whistleblower*) Dalam Tindak Pidana Korupsi Berdasarkan Undang-Undang Nomor 13 Tahun 2006 Tentang Perlindungan Saksi Dan Korban, Dihubungkan Dengan Surat Edaran Mahkamah Agung Nomor 4 Tahun 2011 Tentang Perlakuan Bagi *Whistleblower* Dan *Justice Collaborator*, *Jurnal Surya Kencana Dua: Dinamika Masalah Hukum dan Keadilan* 8 no.2, 2021, p. 182-202.

a criminal offense that he heard himself, he saw himself, and or he experienced himself.<sup>15</sup> Reporters and witnesses in relation to law enforcement against laundering is a different matter from each other. Whistleblowers in money laundering cannot be used as witnesses in the trial process. So that his identity must be kept secret by investigators, prosecutors, judges and other people related to money laundering. Thus, the position of a witness in a money laundering crime is certainly different from that of a whistleblower, where the witness will give evidence before the trial, so that his identity and himself will be known to the public, including known to the defendant. However, whether the complainant or the complainant who has reported an alleged crime of money laundering or witnesses who testify before the trial must be given special protection from the state.<sup>16</sup>

The existence of reporting from parties charged with the obligation to report suspicious financial transactions is important in preventing and combating money laundering. Similarly, the testimony submitted by witnesses, is also an important factor to prove the truth has been the occurrence of money laundering. Generally, law enforcement has difficulty getting witnesses, especially in cases of economic crimes, including money laundering to appear before the trial. This is very reasonable, considering that people who should be acting as witnesses are reluctant to become witnesses, because they are worried about threats obtained from certain parties that can threaten the safety of themselves and their families. Based on the report data obtained by LPSK in 2019, there were at least 67 requests for witness protection for corruption cases received by LPSK throughout 2019. This indicates the importance of reporting witness testimony as a key in a case as well as the need for protection of reporting witnesses.

Protection against whistleblowers and witnesses can basically be divided into 2 (two) types, namely legal protection and special protection. Legal protection, namely protection not to be prosecuted either civilly or criminally. This protection is important, given the potential for a reporter who is then designated as a suspect. A national-scale case that is still fresh in memory, namely the story experienced by Endin Wahyudin reporting criminal acts allegedly committed by several judges. Then the judge made a "counterattack " by complaining that Endin had committed a criminal offense of defamation. The judge was acquitted, while the complainant was convicted by the court for the alleged criminal act.

It can be seen in the case experienced by Nurhayati, who served as Finance Director of Citemu Village, Cirebon Regency, who reported allegations of corruption in Citemu village in fiscal year 2019, who was later named a suspect for national for scale cases we can see the case of indosurya that indication money laundering en masse by using a cooperative business in running its business.<sup>17</sup> Some of the examples or cases above are tragic stories experienced by whistleblowers, which give a negative message to law enforcement in Indonesia and have one thing in common, namely "counterattack" from the reported Party. Therefore, not many people are willing to take the risk to report a crime, if there is concern if he, his family and property do not get legal protection from all kinds of possibilities,

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<sup>15</sup> Edward Fernando Siregar, Helvis, dan Markoni, "Analisa Yuridis Eksekusi Sita Jaminan Terhadap Tindak Pidana Pencucian Uang (TPPU) First Travel," *Jurnal Syntax Transformation*, 2, no. 11 2021, p.1560 – 73

<sup>16</sup> Kusbianto, Ariman Sitompul, Adiputra, Miftahuddin, *The Impact Of Criminal Police On Money Laundering Against The Resilence Of The Law*. Substantive Justice International Journal Of Law, 5, no.2, 2022, p.164

<sup>17</sup> Mhd.Nasir Sitompul, Ariman Sitompul, *The Criminal Replacement Of Fine In Law Of Money Laundering Number 8 Of 2010, (Case Study In Nort Sumatera)* *Internasional Journal Creative Research Thoughts* 1, no.1 2020.

including the possibility to be designated as a suspect. Likewise with witnesses, if they do not receive adequate protection, they will be reluctant to give evidence in accordance with the facts experienced, seen and felt by themselves, because of concerns in the form of threats obtained from certain parties who are interested in the testimony that will be given by witnesses before the trial.

Meanwhile, Special Protection for whistleblowers and witnesses according to Article 5 of Government Regulation No. 57 of 2003 on Special Protection Procedures for whistleblowers and witnesses of money laundering, includes : a) Protection of personal safety, and/or family of the complainant and witnesses from physical and mental threats; b) Protection of property of reporters and witnesses; c) Secrecy and disguise of the identity of the complainant and witness; and/or giving information without face to face with the suspect or defendant at any level of examination of the case.

The process for obtaining special protection by the complainant or witness from the Indonesian National Police is based on the possibility of threats that endanger themselves, lives, and/or property, including the family of the complainant or witness as a result of suspicious financial transaction reports submitted by the complainant or the determination of a person as a witness. The protection is specifically communicated in writing to the local regional police by an investigator, public prosecutor or judge adapted to the level of the examination.

Termination of special protection against reporters and witnesses is terminated based on the assessment of the Indonesian National Police, that special protection is no longer needed against reporters or witnesses. Or based on the request of the person concerned, that the complainant and Witness are no longer in need of special protection. Termination of special protection is communicated to the complainant or witness and his family no later than 3 x 24 hours before the termination of special protection. If the complainant or witness considers that special protection is still needed, the Indonesian police upon the request of the complainant or witness is obliged to continue providing special protection for the complainant or witness who has been stopped. The complainant or witness is not charged, but is charged to the budget of the Indonesian National Police.

#### 4. CONCLUSION

Whistleblowers who submit reports of suspected money laundering or someone who is appointed as a witness in the process of examining laundering crimes are obliged to obtain protection from the state. The protection given to reporters and witnesses is given in two forms, namely legal protection and special protection. Legal protection, namely an exception to the reporting of money laundering offenses stipulated in Article 607 of law no.1/2023 of the Criminal Code. Meanwhile, special protection, in the form of a guarantee of safety for the life, property and family of the complainant from the Indonesian National Police, which is given based on the request of the complainant.

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