

CRIMINAL POLICY RECONSTRUCTION ADDITIONAL MONEY SUBSTITUTES IN THE ERADICATION OF CORRUPTION

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ABSTRACT

The point of this study is to look into how extra criminal money substitutes can be used in corruption and come up with the best way to use them so that state asset recovery works better. Corruption, as an extraordinary crime, requires a comprehensive legal approach, including a strategy of financial recovery for the state through additional criminal mechanisms. The current regulation still faces challenges in implementation, especially related to the effectiveness of the seizure and return of assets resulting from corruption crimes. This research uses a normative legal methods with a legislation approach, a theory approach, a comparative law approach, and a conceptual approach. The data sources used consist of primary, secondary, and tertiary legal materials that are analyzed qualitatively with descriptive analysis techniques to understand the application of applicable laws and explore solutions to the obstacles faced in the implementation of additional money substitutes. The results showed that, although the provision of additional criminal money substitutes has been regulated by the Corruption Eradication Act, its implementation is still not effective due to various legal and technical constraints. To increase its effectiveness, it is necessary to strengthen regulation through the application of the theory of reversal of the burden of proof, the ratification of the draft law on asset seizure, and the harmonization of asset recovery mechanisms with international legal standards, such as UNCAC. In addition, the synergy between law enforcement agencies must be strengthened in order to maximize the process of tracing, freezing, confiscating, and recovering assets resulting from corruption.

Keywords: Additional Criminal, Money Replacement, Asset Recovery

1. INTRODUCTION

Background

The rapid development of the national economy demands new ideas and innovations in national development in order to remain adaptive to the challenges of the times. Indonesia, as a developing country, continues to strive to implement sustainable development in order to realise a just and prosperous society, based on Pancasila and the Constitution of the Republic of Indonesia in 1945. One of the crucial efforts towards realising this goal is the prevention and eradication of corruption. Corruption is an extraordinary form of crime that not only harms the country's finances but also inhibits economic growth, undermines social order, and threatens the stability of the nation. Abuse of authority by state officials for personal or group interests creates a wide impact on the national economic system.

Indonesia recognises that corruption is not only a violation of the law with financial implications but also harms social and economic rights in the community. Therefore, this crime is classified as an extraordinary crime that requires extraordinary handling as well. Corruption from a legal perspective is defined as an act that violates official obligations with the intention of obtaining personal or other party benefits unlawfully. Law No. 20 of 2001, as an amendment to Law No. 31 of 1999 on the eradication of corruption, becomes a legal instrument that regulates the comprehensive eradication of corruption. Data obtained from Indonesia Corruption Watch shows that the number of corruption cases increases significantly every year, both in terms of the number of cases, suspects, and state losses, which reflects the complexity and extent of this crime in various aspects of people's lives.

The phenomenon of increasing corruption cases every year is a serious challenge for the government in carrying out the function of prevention, action, and eradication of corruption. States have an obligation to maintain national economic stability, and since corruption is classified as an extraordinary crime, its handling must involve extraordinary measures as well, including international legal cooperation in extradition efforts for perpetrators who have fled abroad.

The implementation of extradition becomes important in returning corrupted state assets and ensuring that perpetrators can be tried in accordance with applicable law. In addition, corruption eradication efforts not only rely on law enforcement alone but also focus on asset recovery as part of the criminal process that aims to restore the state's finances that are harmed. The return of assets resulting from corruption is an important part of the corruption eradication strategy, in which the state seeks to deprive the perpetrator of the rights to illegally obtained profits.

This concept is based on social justice and the responsibility of the state to recover the economy affected by acts of corruption. In Indonesia, the criminal law system allows for the recovery of assets by seizing, confiscating, and taking

away the right to own the money obtained through crime. However, the implementation of asset returns still faces various obstacles, including difficulties in proving the relationship between assets and crimes committed. Some people think that the Code of Criminal Procedure's (KUHAP) property-based legal system doesn't help with the asset recovery process enough because it focusses more on proving crimes than on getting the state money back.

The Supreme Court, in some of its rulings, has tried to apply additional penalties in the form of money substitutes to restore state losses due to corruption. However, the effectiveness of this mechanism is still questionable because the penal money substitute is an alternative, and in some cases, convicts who are unable to pay the money substitute can replace it with imprisonment. This has the potential to reduce the deterrent effect and hinder the country's financial recovery efforts.

Additionally, figuring out surrogate money isn't always easy. This is especially true when assets obtained through corruption have been hidden or moved using different types of financial schemes, such as opening accounts in other people's names or investing in assets that are hard to track. The complexity of corruption cases involving more than one perpetrator and a wide network further complicates asset recovery efforts. The element of state financial losses in corruption crimes confirms that the eradication of corruption aims not only to punish the perpetrators but also to restore state finances. The available legal instruments accommodate additional penalties in the form of replacement money payments, but their effectiveness in implementation still faces major challenges. Apart from the suboptimal nature of the legal substance, various bureaucratic and diplomatic obstacles persist, particularly when assets resulting from corruption are located abroad. The process of asset tracking and seizure requires effective international cooperation, while at home, law enforcement still faces various limitations, both in terms of regulation and resources.

Corruption is a major challenge in Indonesia's national development and economic stability. Therefore, combating corruption requires not only a repressive approach in the form of criminal punishment but also a more effective asset recovery strategy. Difficulties in identifying, seizing, and returning assets resulting from corruption indicate the need to strengthen regulatory and legal mechanisms in order to maximise the country's financial recovery and provide a stronger deterrent effect against perpetrators.

Formulation Of The Problem

1. How is the application of additional money substitutes in corruption?
2. What is the Ideal concept of the application of additional money substitutes in corruption?

2. RESEARCH METHODS

In general, legal research is a series of activities with a scientific method aimed at finding the truth through a systematic, whole and consistent approach. Peter Mahmud Marzuki defines legal research as a process to find the rule of law, legal principles, and legal doctrines in order to answer the issues faced in the field of law. The research used in this study is normative legal research, which is a research method that focuses on testing the norms or provisions of applicable law. This study was conducted by reviewing literature or secondary data to understand and analyse the legal provisions relevant to the issues discussed. The approach to the problem in this study is carried out by various methods that support a thorough analysis of the law. The statutory approach, or statute approach, is carried out by reviewing all laws and regulations related to the legal issues being studied.

This approach is often referred to as a normative juridical approach because it focuses on legal material in the form of legislation that is the basis for research. In addition, this study also uses a theoretical approach, where the legal norms studied are not only independent but also influenced by the underlying legal principles and theories. In this case, the theory of law becomes a meta-theory of legal dogmatics that forms the basis of argumentation in research. This study also uses a comparative law approach, which is a method that compares the legal system in Indonesia with the legal system in other countries, in this case the United States, to obtain an overview of the similarities and differences in the application of additional money substitutes in corruption.

The conceptual approach, or conceptual approach, is also used to examine the views and doctrines that develop in legal science, which are the basis for building legal arguments related to asset return policies through additional money substitutes. The data used in this study is secondary data sourced from the library, including primary, secondary, and tertiary legal materials. The main source of legal information is laws that must be followed, like Law Number 20 of 2001, which made changes to Law Number 31 of 1999 about getting rid of corruption, and the Criminal Code, which is set out in Law Number 1 of 1946 and Law Number 1 of 2023. Secondary legal materials include legal literature, scientific journals, and legal articles, as well as various documents describing and analysing primary legal materials.

Meanwhile, tertiary legal materials include sources such as dictionaries, encyclopaedias, and mass media, as well as other references that provide clues or explanations to primary and secondary legal materials. The technique of data collection in this study is done through the study of literature, which includes the study of various legal literature,

policies, and theories relevant to the problems studied. The process of gathering data was done in stages. First, news searches and written legal sources like the Criminal Code and laws and rules about corruption were used. Next, books and scientific papers about extra money substitutes in corruption were read.

Data analysis in this study uses qualitative methods, which aim to compile data systematically in order to obtain a comprehensive picture of the legal issues under study. The Data obtained were analyzed descriptively, namely by providing explanations, describing, and describing legal conditions based on applicable regulations. In addition, the analysis is carried out by grouping and adjusting the legal materials that have been collected with legal theories and relevant policies in the legal and social sciences.

This method of analysis aims to obtain conclusions that are scientific and comprehensive. In this study, law is seen as a social phenomenon that affects many areas of life. This means that the descriptive method will give a clear picture of how more criminal money substitutes are used in corruption and what that means for the justice system. The goal of this method is to look at and understand how the law is applied based on current theories and policies. This will help the study get a better idea of how well extra money substitutes work to fight corruption.

3. DISCUSSION

1. Application Of Additional Criminal Money Substitutes In Corruption

The application of additional criminal money substitutes in corruption is one of the legal instruments that aims to restore state losses arising from acts of corruption. The Criminal Code (KUHP), Law Number 31 of 1999 jo. Law No. 20 of 2001 on the eradication of corruption, and the Supreme Court of the Republic of Indonesia Regulation No. 5 of 2014 on additional crimes in corruption both include this new law. This regulation serves as a legal basis in the process of the execution of asset seizure, the imposition of replacement money, as well as the determination of state losses due to corruption. In general, the Criminal Code provides for additional crimes in Article 10, which include deprivation of certain rights, deprivation of certain goods, and announcement of a judge's verdict.

Based on legal principles, additional crimes cannot be imposed without the existence of a principal crime, but the principal crime can stand alone without additional crimes. The judge can impose one principal crime with more than one additional crime as needed in a case. In the realm of corruption crimes, the discourse surrounding additional crimes such as money substitutes continues to grow, both in terms of the formation of legal norms and their application by law enforcement officers. This is because corruption is often committed by state officials or individuals who have access to power, making the process of proving and recovering assets more complex.

One aspect that is the main problem in combating corruption is how to ensure the return of state losses due to corruption. The rescue of state assets is crucial because often in practice, law enforcement officers cannot optimally return the money from corruption that has been diverted or hidden by the perpetrators. Article 18 of the Corruption Eradication Law sets the rules for the extra crime of money substitutes in corruption. This extra crime is used as part of the state's financial recovery system.

The instruments used in order to recover state losses generally refer to Article 18, paragraph (1), which mentions several additional forms of crime in corruption. One of them is the seizure of goods, which includes movable and immovable goods obtained as a result of corruption, including companies owned by convicts or goods that replace items resulting from corruption. In addition, there is an additional crime in the form of the payment of replacement money, whose amount is, as much as possible, equal to the property obtained from corruption. This regulation aims to prevent corruption perpetrators from enjoying the results of their crimes and ensure that the state can recover the money that has been harmed. Furthermore, the additional penalties include the closure of the company for a year and the revocation of certain rights previously granted by the government to the convict.

Compared to the Criminal Code, Article 18, paragraph (1) of the law on Combating Corruption adds more crimes. This is meant to discourage people from committing corruption and get the state's finances back on track. Application of additional penalties in corruption offences compensates offender loot with state losses. If the value of the seized assets is insufficient, additional penalties in the form of replacement payments will be imposed in accordance with Article 18, paragraph (1), letter B, and paragraph (3) of the Corruption Eradication Act. In cases of corruption crimes, this punishment shows that returning state funds isn't just possible by seizing assets; it can also be done through other crimes. This leads to the implication that the greater the number of state losses, the higher the value of the assets to be seized, the amount of replacement money to be paid, as well as other additional levels of sanctions.

The process of asset seizure can be carried out both at the stage of investigation and prosecution and after a decision with permanent legal force. However, in practice, the implementation of asset forfeiture often faces challenges because assets obtained as a result of corruption have often been diverted or hidden, making the process of tracking and confiscation more difficult.

Normatively, the additional criminal provisions in Article 18 of the law on Combating Corruption have the potential to be an effective instrument in combating corruption, especially in the recovery of state finances. However, in its application, there are various obstacles that cause its effectiveness to be questioned. One of the primary issues is that the use of additional criminal money substitutes frequently presents both advantages and disadvantages. In some cases, the execution of asset seizure is considered to be carried out without a clear procedure, giving rise to problems of justice and legal certainty.

There is also an assumption that the process of asset seizure tends to be done haphazardly without sorting out the assets actually obtained from corruption. In some cases, the convict and his family may not know that their assets are corrupt, creating legal uncertainty. Thus, a more thorough analysis of the asset seizure law is needed to implement it fairly and effectively. Regarding extrajudicial killings, Article 18 paragraphs (2) and (3) of the law on Combating Corruption say that if the convict doesn't pay the replacement money within one month of the decision becoming law, the prosecutor can take the convict's property and sell it to raise the money.

If the convict does not have sufficient property, he will be subject to imprisonment in lieu of replacement money. In this way, Article 18 gives police more power to go after people who are corrupt, even if that means taking assets away and auctioning them off to get the state's money back. However, the problem that arises is that in many cases, the assets owned by the convict have been transferred to other parties or disguised in various forms of investment, making the execution process difficult. In addition, in some cases, there are lawsuits from third parties claiming ownership of the assets that have been seized, complicating the legal process.

In practice, there are two models of charging replacement money used in the justice system, namely the burden of jointly and severally liable and proportional charging. In the joint liability model, defendants who are more than one person have a joint obligation to pay replacement money. This model allows one defendant to pay the entire replacement amount so that the other defendant does not have to pay again. In the proportional model, the judge determines the replacement money amount based on each defendant's contribution to corruption. Both of these models have their advantages and disadvantages, but the problem is the lack of legal certainty in their application. The absence of a standard in determining the amount of replacement money to be paid by each defendant often leads to disparities in court decisions.

The execution of money substitutes also faces various obstacles that cause the effectiveness of the country's financial returns to be far from optimal. Many cases show that the defendant does not fulfil the obligation to pay the replacement money that has been decided by the court. These conditions require the prosecutor to seize and auction the convict's assets to ensure the state's financial return. However, in many cases, the remaining assets are insufficient to cover the replacement money, resulting in a loss for the state. In addition, in some cases, there is a delay in the execution process, which leads to depreciation of the asset before it is auctioned.

Another obstacle in the criminal imposition of additional surrogates is that many cases of corruption only come to light after years have passed, making it difficult to trace assets that have been transferred. Corrupt actors also often use various strategies to disguise ownership of assets, including through money laundering and disguising in the form of investments or property on behalf of others. In some cases, third parties also sued the government over seized assets, making the process of returning state money more complicated. Therefore, a more comprehensive legal strategy is needed so that the country's financial returns can run effectively and in accordance with the principles of justice.

2. The Ideal concept of the application of additional criminal money substitutes in corruption

The seizure of assets and the return of state finances obtained from the proceeds of corruption is a crucial aspect in efforts to eradicate corruption crimes. The recovery of assets that have been seized by perpetrators of corruption crimes is not just a legal mechanism, but also a concrete form of justice that must be upheld in the Indonesian criminal law system. In practice, the process of returning state finances that have been corrupted by criminals is not easy, especially when it comes to the implementation of additional crimes in the form of replacement money, which is often difficult to realize. In addition to the criminal route, the return of state finances can also be done through the civil route, but this route still faces various obstacles, especially in terms of legal certainty.

Various obstacles that occur in the seizure of assets and the return of proceeds of crime indicate that the current regulations are still not effective enough and require more comprehensive reconstruction. In theoretical studies, reconstruction of the regulation of corruption and the return of assets of state financial losses has a high urgency to be done in order to adjust the legislation to the development of international law. The ideal model of regulatory reconstruction is not only limited to updating existing arrangements, but also aligning them with the United Nations Convention Against Corruption (UNCAC) of 2003 which has been ratified by Indonesia through Law Number 7 of 2006.

This reconstruction should be based on three main foundations, namely the philosophical, sociological and juridical foundations. From a philosophical point of view, the regulation on the seizure of assets and the return of state finances must take into account legal ideals rooted in the values of Pancasila and the 1945 Constitution, which promote social

justice and the principle of the rule of law. Sociologically, the applicable law must be in harmony with the needs and legal awareness of society, so that it is effective in its application. While juridically, the new regulation must be able to fill the legal void that has been an obstacle in the process of returning assets from corruption.

In the perspective of legal theory, the doctrine of crime does not pay is a philosophical basis that asserts that the perpetrator of a crime should not benefit from the results of his actions. Therefore, the seizure of assets resulting from corruption should not only rest on criminal mechanisms, but must be strengthened through civil law mechanisms as well as administrative approaches.

Experience in various countries shows that an effective strategy for recovering assets resulting from corruption includes the use of the non-convictionbased asset forfeiture (NCB-asset forfeiture) mechanism, which is the seizure of assets without having to wait for a criminal verdict against the perpetrator.

This Model has been implemented in several countries, such as the United States, the United Kingdom, and Hong Kong, with significant success in returning assets rushed abroad. In Indonesia, this concept still needs to be developed and harmonized with the applicable legal system in order to be implemented effectively. One of the main challenges in asset seizure is the proof of the origin of assets suspected of corruption.

Therefore, the application of the reversal burden of proof theory is important in this context. In the theory of criminal law, a limited reversal of the burden of proof can be applied in cases of corruption, in which the accused is obliged to prove that the assets in his possession were lawfully acquired. Although the reversal of the burden of proof can lead to debate in the perspective of human rights, many countries have implemented it with various forms of modification to maintain the principles of justice and due process of law.

The High Court of Hong Kong in the case of Attorney-General of Hong Kong v. Hui Kin Hong has implemented this approach, in which the accused is required to prove that his assets were acquired through legitimate sources after the prosecutor successfully proved the existence of an impropriety in the amount of assets he owns compared to his income. In Indonesia, efforts to seize assets resulting from corruption must also be supported by strengthening the authority of the Corruption Eradication Commission (KPK) and synergy of coordination between law enforcement agencies. Article 6 of UNCAC 2003 requires each state party to establish an independent body tasked with the prevention and eradication of corruption. Indonesia already has the KPK as an independent institution that plays a role in combating corruption, but there are still various challenges in its implementation, especially after the revision of the KPK Law Through Law Number 19 of 2019 which reduces some of the strategic authority of this institution. Strengthening the KPK in returning corruption assets requires clearer regulations related to the mechanism of tracing, freezing, confiscation, and asset recovery.

In addition, the synergy between the KPK, the Attorney General's Office, the police, the Center for reporting and analysis of financial transactions (PPATK), and the Supreme Court must be strengthened so that there is no overlap of authority in handling corruption cases and recovering state assets.

From the point of view of legislative policy, it is necessary to create new regulations that specifically regulate the mechanism for returning assets resulting from corruption. The draft asset forfeiture law, which has been proposed since 2012, must be passed immediately in order to have a strong legal basis in its implementation. Some countries already have specific regulations related to asset forfeiture, such as the Proceeds of Crime Act 2002 in the United Kingdom and the Civil Asset Forfeiture Reform Act 2000 in the United States.

Similar regulations in Indonesia will provide a stronger legal basis in dealing with assets resulting from crime, both within the country and those that have been transferred abroad.

When it comes to criminal law, plea bargaining can also be an option for settling corruption cases, as long as the defendant is willing to return all the assets that were obtained through the crime. The way plea bargaining is used in common law countries can be changed to work with Indonesia's civil law legal system. However, this idea needs to be studied more so that it isn't used as a way for corrupt people to get off easy without returning their assets.

Overall, the seizure of assets and the return of state finances from the proceeds of corruption is a strategic step that must be strengthened through the reconstruction of regulations, the application of the theory of reversing the burden of proof, strengthening the authority of the KPK, and synergy between law enforcement agencies. More progressive and comprehensive regulations must be drawn up immediately to ensure that any assets resulting from corruption can be returned to the state, thus not only providing a deterrent effect for perpetrators, but also ensuring that state finances that have been corrupted can be reused for the public good.

Thus, the eradication of corruption in Indonesia is not only oriented to the punishment of perpetrators, but also to the recovery of assets that have been harmed as a result of the crime.

4. CONCLUSION

This study confirms that the application of additional criminal money substitutes in corruption has a crucial role in efforts to restore state losses arising from corruption crimes. Although normatively the regulations governing this additional crime have been accommodated in the legislation, its implementation still faces various obstacles, including difficulties in asset tracking, confiscation, and execution of replacement payments. The ideal Model in the application of additional criminal money substitutes should include a more comprehensive approach, including the application of the theory of reversal of the burden of proof, harmonization of regulations with international legal standards such as UNCAC, as well as strengthening the authority of law enforcement agencies, especially the Corruption Eradication Commission (KPK).

In addition, synergy between law enforcement agencies is needed in tracing, freezing, confiscation, and asset recovery so that the effectiveness of asset recovery can be improved. The concept of non-conviction based asset forfeiture (NCB-asset forfeiture) which has been implemented in several countries can be an alternative in accelerating the process of returning state finances without having to wait for a criminal verdict with permanent legal force. The drafting of more progressive and comprehensive regulations, such as accelerating the passage of Asset Forfeiture bills, is an important step in ensuring the effectiveness of asset recovery policies. This policy reform aims to close the legal loopholes that are still being exploited by corruption actors in hiding or transferring assets from crime. Therefore, the eradication of corruption in Indonesia should not only be oriented towards punishing perpetrators, but should also focus on more effective asset recovery strategies to ensure that state finances that have been corrupted can be reused in the public interest.

5. BIBLIOGRAPHY

- [1] Ali, M., Nurhidayat, S., Prabowo, M. S., & Muhammad, R. (2021). Corruption, asset origin and the criminal case of money laundering in Indonesian law. *Journal of Money Laundering Control*, 25(2). <https://doi.org/10.1108/jmlc-03-2021-0022>
- [2] Butt, S. (2014). Corruption and law in Indonesia. <https://doi.org/10.4324/9780203584729>
- [3] Doda, A. M., Wantu, F. M., & Ismail, D. E. (2023). Return of state losses in the investigation process that can eliminate criminal perpetrators of corruption. *Estudiante Law Journal*, 5(1).
- [4] Hiariej, E. O. S. (2019). United Nations Convention Against Corruption dalam Sistem Hukum Indonesia. *Mimbar Hukum - Fakultas Hukum Universitas Gadjah Mada*, 31(1). <https://doi.org/10.22146/jmh.43968>
- [5] Kurniawan, D., & Akbar, R. (2021). The evaluation of performance indicators development: A study on Indonesian Financial Transaction Report and Analysis Center (PPATK). *Journal of Accounting and Investment*, 22(3). <https://doi.org/10.18196/jai.v22i3.11157>
- [6] Muhtar, M. H. (2019). Model politik hukum pemberantasan korupsi di Indonesia dalam rangka harmonisasi lembaga penegak hukum. *Jambura Law Review*, 1(1).
- [7] Muhtar, M. H., Maranjaya, A. K., Arfiani, N., & Rahim, E. (2023). *TEORI & HUKUM KONSTITUSI: Dasar Pengetahuan dan Pemahaman serta Wawasan Pemberlakuan Hukum Konstitusi di Indonesia*. PT. Sonpedia Publishing Indonesia.
- [8] Puluhulawa, M. D., Puluhulawa, F. U., & Ismail, D. E. (2020). Anotasi perlindungan hukum whistleblower dan justice collaborator dalam upaya pemberantasan tindak pidana korupsi. *Al Ahkam*, 16(2).
- [9] Prasetyo, Y., Irawan, F., Wibowo, S., Budiono, A., & Indiantoro. (2020). Illnesses as an excuse for corrupt Indonesian officials to be free from legal liabilities. *Medico-Legal Update*, 20(1). <https://doi.org/10.37506/mlu.v20i1.728>
- [10] Sabani, A., Farah, M. H., & Dewi, D. R. S. (2019). Indonesia in the spotlight: Combating corruption through ICT enabled governance. *Procedia Computer Science*, 161. <https://doi.org/10.1016/j.procs.2019.11.130>
- [11] Setiawan, M. A. (2022). Arrest and detention in Indonesian criminal procedure code under human rights perspective. *International Journal of Social Science Education Communication and Economics (SINOMICS JOURNAL)*, 1(2). <https://doi.org/10.54443/sj.v1i2.15>
- [12] Suryani, I., Muhtar, M. H., Rahman, Y. M., Jaya, B. P. M., & Al Khalaf, A. (2023). Integration of Islamic Law in regional development in Indonesia. *JURIS (Jurnal Ilmiah Syariah)*, 22(1).
- [13] Syarif, M., Ramadhani, R., Graha, M. A. W., Yanuaria, T., Muhtar, M. H., Asmah, N., Syahril, M. A. F., Utami, R. D., Rustan, A., Nasution, H. S., Putera, A., Wilhelmus, K., & Jannah, M. (2024). *Metode Penelitian Hukum*. GET Press Indonesia.
- [14] Wibowo, M. H. (2018). Corporate responsibility in money laundering crime (perspective criminal law policy in crime of corruption in Indonesia). *Journal of Indonesian Legal Studies*, 3(2). <https://doi.org/10.15294/jils.v3i02.22740>



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