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Threatening Public Trust: The Crimes of Counterfeiting and Circulating Counterfeit Currency

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Abstrak: Tindak pidana pemalsuan uang dan pengedaran uang palsu merupakan kejahatan yang mengancam stabilitas sistem moneter, merugikan masyarakat, serta mengganggu kepercayaan publik terhadap mata uang sebagai alat pembayaran yang sah. Oleh karena itu, penegakan hukum terhadap pelaku tindak pidana tersebut harus dilakukan secara efektif melalui penerapan ketentuan pidana yang tepat. Penelitian ini bertujuan untuk menganalisis penerapan hukum pidana terhadap tindak pidana pemalsuan uang dan pengedaran uang palsu serta mengkaji pertimbangan hukum hakim dalam menjatuhkan putusan pada perkara Nomor: 135/Pid.B/2016/PN.Tsm. Penelitian ini menggunakan metode penelitian hukum normatif dengan pendekatan perundang-undangan *(statute approach)* dan pendekatan kasus *(case approach)*. Bahan hukum yang digunakan meliputi bahan hukum primer, sekunder, dan tersier yang dianalisis secara kualitatif. Hasil penelitian menunjukkan bahwa majelis hakim menerapkan Pasal 245 Kitab Undang-Undang Hukum Pidana (KUHP) dengan menyatakan terdakwa terbukti mengedarkan uang palsu yang diketahuinya sebagai uang palsu, di mana terdakwa terbukti dengan sengaja mengedarkan uang palsu yang diketahuinya sebagai uang palsu. pertimbangan hukum hakim belum menguraikan secara komprehensif kemungkinan penerapan konsep perbuatan berlanjut pengaturan mengenai tindak pidana mata uang juga telah diatur secara lebih khusus dalam Undang-Undang Nomor 7 Tahun 2011 tentang Mata Uang yang memberikan perlindungan lebih komprehensif terhadap sistem moneter nasional. Penelitian ini menyimpulkan bahwa pertimbangan hakim masih berfokus pada pembuktian unsur delik tanpa menguraikan secara komprehensif konstruksi hukum atas rangkaian perbuatan yang dilakukan oleh para terdakwa berdasrkan fakta persidangan. Selain itu dalam perkara yang berkaitan dengan pemalsuan uang dan pengedaran uang palsu, hakim seyogianya juga mempertimbangkan tujuan pemidanaan yang lebih luas, yaitu perlindungan masyarakat *(social defence)*, pencegahan kejahatan *(deterrence),* serta perlindungan terhadap stabilitas sistem moneter.

Kata Kunci: Pemalsuan; Pengedaran; Uang

***Abstract**: The criminal offenses of currency counterfeiting and the circulation of counterfeit money constitute serious crimes that threaten the stability of the monetary system, cause financial losses to society, and undermine public confidence in currency as a lawful means of payment. Therefore, effective law enforcement through the proper application of criminal law is essential to combat such offenses. This study aims to analyze the application of criminal law to the offenses of currency counterfeiting and the circulation of counterfeit money, as well as to examine the legal reasoning adopted by the judges in Decision Number 135/Pid.B/2016/PN.Tsm. This research employs a* *normative legal research method using both the statute approach and case approach. The legal materials consist of primary, secondary, and tertiary legal sources, which were analyzed qualitatively. The findings indicate that the panel of judges applied Article 245 of the Indonesian Criminal Code (Kitab Undang-Undang Hukum Pidana), concluding that the defendant had intentionally circulated counterfeit currency while knowingly recognizing it as counterfeit. However, the judges' legal reasoning did not comprehensively address the possible application of the doctrine of a continuing offense voortgezette handeling under Article 64 of the Indonesian Criminal Code. Furthermore, offenses relating to currency have been more specifically regulated under Law Number 7 of 2011 on Currency, which provides a more comprehensive legal framework for safeguarding the national monetary system and protecting the integrity of the Indonesian Rupiah. This study concludes that the judges' legal reasoning primarily focused on establishing the constituent elements of the offense without comprehensively examining the legal characterization of the series of acts committed by the defendants based on the facts established during the trial. Furthermore, in cases involving currency counterfeiting and the circulation of counterfeit money, judges should also take into account the broader objectives of sentencing, including social defence, crime deterrence, and the protection of the stability of the national monetary system. A more comprehensive judicial analysis of these aspects is essential to ensure legal certainty, consistency in the application of criminal law, and effective protection of the public interest.*

Keywords: *Counterfeiting; Circulation; Money*

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A. INTRODUCTION

Money is a generally accepted medium of exchange or payment; it possesses specific units with standardized values and holds purchasing power for goods and services. Money has been likened to a colorless mirror capable of reflecting all colors (Syafarudiin, 2011). Given the immense importance of money, some individuals desire to amass as much wealth as possible in the shortest time possible.[1] The urge to enrich oneself through easy means drives people to commit criminal acts. According to Simons, the term "criminal act" (strafbaar feit) refers to an unlawful act intentionally committed by a person who can be held accountable for their actions and which the law has designated as punishable (Mulyati Pawennei, 2015). Counterfeiting is a form of crime that has long been recognized within the Indonesian criminal justice system. This crime not only causes economic loss to the public the direct victims but also threatens monetary stability, erodes public confidence in the Rupiah, and potentially disrupts the national payment system. Unlike conventional crimes that generally affect specific individuals, counterfeiting is characterized as a crime against the interests of the state, as it undermines the legitimacy of the state-guaranteed currency.[2] Consequently, the state provides legal protection through criminal provisions stipulated in the Criminal Code (KUHP) and Law Number 7 of 2011 concerning Currency.[3]

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Prior to the enactment of Law Number 7 of 2011 concerning Currency, regulations regarding counterfeiting relied primarily on Articles 244 and 245 of the Criminal Code, which addressed the acts of counterfeiting currency and circulating counterfeit money with the knowledge of its inauthenticity.[4] Given advancements in printing technology and digitalization, alongside the increasing complexity of economic crimes, those regulations were deemed inadequate; consequently, the government enacted Law Number 7 of 2011 to provide a more comprehensive framework for the protection of the Rupiah and the associated criminal penalties. This Law expands the scope of criminal offenses to include the production, possession, transport, circulation, and trading of counterfeit Rupiah, as well as the means used in the counterfeiting process.[5]

The perpetrators' modus operandi is evolving, increasingly utilizing high-resolution printing technology, commercial transactions, and distribution via organized networks. This situation demonstrates that the mere existence of criminal statutes is insufficient without consistent law enforcement, accurate evidentiary proof, and judicial reasoning that reflects the objectives of sentencing: legal certainty, justice, and utility.[6] A case worthy of examination is Judgment Number 135/Pid.B/2016/PN.Tsm found in the Tasikmalaya District Court's judgment directory concerning the continuous circulation of counterfeit banknotes. In this case, Defendant 1 (Ridho Fahri, alias Budi) produced counterfeit money between December 2015 and January 2016 at his rented home in Kukun Hamlet, Ciantra Village, Cikarang; he did so by replicating genuine Rp50,000 banknotes using an Epson L350 color photo-copier printer and Duslah (low-grade/matte) HVS paper.[7] This case, involving the crime of circulating counterfeit money, was adjudicated by the Tasikmalaya District Court. Analyzing this judgment is crucial to understanding how the panel of judges applied the elements of the offense, how evidence was established in accordance with criminal procedural law, and whether the judges' legal reasoning aligned with applicable statutory regulations. Examining court judgments also provides insight into the consistency of applying criminal norms in judicial practice, thereby serving as a benchmark for the effectiveness of law enforcement against the crime of counterfeiting currency.[8]

This study examines the legal implications of Article 245 of the Criminal Code regarding the crime of circulating counterfeit currency and asserts that the provisions of Law Number 7 of 2011 offer more comprehensive legal protection than those found in the Criminal Code.[9] Furthermore, Rian Mintalangi (2017) explains that Articles 36 and 37 of Law Number 7 of 2011 expand the scope of offenses related to counterfeit Rupiah, thereby serving as the primary legal basis for law enforcement against Rupiah counterfeiting. Other research also indicates that the success of efforts to eradicate the circulation of counterfeit currency depends on coordination among law enforcement agencies, the effectiveness of evidentiary processes, and public participation in reporting such crimes.[10]

The ruling establishes that the perpetrator was proven to have committed multiple criminal offenses specifically, the continuous counterfeiting and circulation of counterfeit currency constituting a "continuing act" (voortgezette handeling). The act of circulating counterfeit currency by spending it constitutes a subsequent offense following the act of counterfeiting itself; as these crimes cause significant harm to the State and the public, it is appropriate for the perpetrator to face severe penalties, including imprisonment and substantial fines. However, the panel of judges charged the perpetrator solely under Article 245 of the Criminal Code, sentencing them to one year and six months of imprisonment. Based on this background, this study aims to analyze the application of criminal law regarding the counterfeiting and circulation of counterfeit currency and to examine the judges' legal reasoning in Judgment Number 135/Pid.B/2016/PN.Tsm. It is hoped that this research will provide both academic and practical contributions to the development of Indonesian criminal law, particularly regarding the legal protection of currency as a symbol of state sovereignty.

B. METHOD

This study is classified as qualitative research, employing procedures that yield descriptive data specifically written information derived from documents, the Criminal Code, the Law on Currency, articles, and the Tasikmalaya District Court judgment (Case No. 135/Pid.B/2016). The study utilizes both the statute approach and the case approach (Peter Mahmud Marzuki, 2012). The statute approach involves examining all relevant legislation concerning the crimes of counterfeiting and circulating counterfeit currency, including the Criminal Code (KUHP), Law Number 7 of 2011 concerning Currency, the Criminal Procedure Code (KUHAP), and other related regulations.[11] The case approach involves analyzing Judgment Number 135/Pid.B/2016/PN.Tsm to evaluate the application of legal norms, evidentiary matters, and the judge's legal reasoning in deciding the case. These approaches are commonly employed in normative legal research to construct comprehensive legal arguments (Peter Mahmud Marzuki, 2012). The legal materials used comprise primary, secondary, and tertiary sources. Primary legal materials include the 1945 Constitution of the Republic of Indonesia, the Criminal Code (KUHP), the Criminal Procedure Code (KUHAP), Law Number 7 of 2011 concerning Currency, and the Tasikmalaya District Court Judgment Number 135/Pid.B/2016/PN.Tsm. Secondary legal materials consist of criminal law textbooks, research findings, scholarly articles, accredited national journals, and expert opinions addressing the crime of counterfeiting, criminal liability, and law enforcement. Tertiary legal materials include legal dictionaries, legal encyclopedias, and other reference sources that explain the legal terms and concepts employed in the research.

C. DISCUSSION

1. Analysis of Criminal Liability for Counterfeiting and the Circulation of Counterfeit Money.

The crime of imitating and counterfeiting currency and banknotes often referred to simply as counterfeiting constitutes an infringement upon the legal interest regarding public trust in money as a legitimate medium of exchange. As a medium of exchange, confidence in money must be safeguarded.[12] This crime is established to protect the public's legal interest in money serving this function. Under Law Number 1 of 1946 concerning Criminal Law Regulations (hereinafter referred to as the Criminal Code or KUHP), the offense of counterfeiting money encompasses acts such as imitating or counterfeiting currency, circulating counterfeit money, reducing the value or denomination of currency, circulating

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damaged money, manufacturing or possessing materials for counterfeiting money, and storing silver pieces deemed to be currency.[13] The criminal acts of imitating and counterfeiting money are regulated in Article 244 of the Criminal Code, which reads as follows: "Any person who imitates or counterfeits currency or banknotes issued by the state or a bank, with the intent to circulate or cause to be circulated said currency or banknotes as genuine and authentic, shall be punished by imprisonment for a maximum term of 15 (fifteen) years." Based on the formulation of Article 244 of the Criminal Code (Said Karim and Haeranah, 2016), the elements contained therein are: the objective element, consisting of the acts of imitating or counterfeiting and the objects involved (currency, state banknotes, or bank banknotes); and the subjective element, consisting of the intent to circulate or cause to be circulated the currency and banknotes as if they were genuine or authentic. The criminal offense of circulating counterfeit currency is governed by Article 245 of the Criminal Code (KUHP), which reads as follows: "Any person who intentionally circulates coins or banknotes issued by the State or a bank as genuine and authentic currency despite the fact that they were imitated or counterfeited by the person themselves, or were known to be inauthentic or counterfeit at the time of receipt or any person who stores or brings such currency into Indonesia with the intent to circulate it, or cause it to be circulated, as genuine and authentic currency, shall be liable to a maximum imprisonment of 15 (fifteen) years."[14]

Based on the formulation of Article 245 of the Criminal Code (KUHP) (Said Karim and Haeranah, 2016), the criminal offense of circulating counterfeit money comprises distinct elements. The objective element consists of the act of circulating the money as genuine and authentic, while the object of the act is non-genuine or counterfeit currency—specifically state banknotes or bank notes rendered non-genuine or counterfeit through imitation or forgery by the perpetrator. The subjective element is the requirement of intent. Articles 244 and 245 of the Criminal Code serve as the focal points for the regulation and discussion of money counterfeiting and circulation as crimes affecting the authority of the State and Bank Indonesia regarding currency or banknotes (under the Criminal Code concept) and the Rupiah currency. Furthermore, the provisions of Articles 244 and 245 of the Criminal Code were subsequently consolidated into Article 36 of Law No. 7 of 2011.[4]

The chronology of the case discussed in this study is as follows: Defendant I, Ridho Fahri (alias Budi bin Hanafi), and Defendant II, Epi Abdul Qadir bin Saprudin, at a date and time they could no longer recall sometime between December 2015 and January 2016 engaged in the alleged conduct at Cikadu Hamlet (RT 04 RW 01), Wanawali Village, Cibatu District, Purwakarta Regency.[15] In Kukun, Ciantra Village, Ciantra District, Cikarang City or at the very least in other locations falling within the jurisdiction of the Tasikmalaya District Court pursuant to Article 84 Paragraph (2) of the Criminal Procedure Code (KUHAP) a continuing criminal act involving the circulation of counterfeit banknotes took place. Initially, Police Brigadier (Brigpol) Epi Firmansyah and Police Brigadier (Brigpol) Dede Heri both members of the Tasikmalaya Resort Police arrested Maman Suherman (subject to a separate case file) for circulating counterfeit money in Tasikmalaya Regency. Subsequently, Brigpol Epi Firmansyah and Brigpol Dede Heri expanded the investigation by arresting Soemantri, Agus Saptari, and Noni Andriani; upon learning that the counterfeit money had been obtained from Defendant I Ridho Fahri and Defendant II Epi Abdul Qadir, the officers proceeded to arrest the defendants. Following the arrest, witnesses Police Brigadier Epi Firmansyah and Police

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Brigadier Dede Heri recovered the following items from Defendant I: 1 (one) box of Duslah (rough/matte) A4 paper, 3 (three) reams of ZAP-brand A4 paper, 1 (one) roll of purple polyester ribbon, 25 (twenty-five) KENKO-brand glue sticks, and 2 (two) cans of Pylok-brand white spray paint. From Defendant II, the witnesses recovered: 1 (one) LPF LAMIPACKER-brand laminating machine (model LPF-330 WH), 3 (three) cans of Pylox-brand white spray paint, 3 (three) cans of Trico Paint-brand clear spray paint, 1 (one) JOYKO-brand date stamp, 1 (one) ARTLINE-brand stamp pad, 1 (one) magnifying glass, 3 (three) watermarks resembling those found on genuine Rp50,000 banknotes, 1 (one) MORGEN-brand UV (ultraviolet) device, 207 (two hundred and seven) sheets of suspected counterfeit Rp50,000 banknotes lacking serial numbers, and 1 (one) box containing a mix of Duslah (rough) paper and HVS A4 paper. Defendant I, Ridho Fahri (alias Budi), produced counterfeit money between December 2015 and January 2016 at his rented home in Cikarang by replicating genuine Rp50,000 banknotes using an Epson L350 color photo-copying printer; specifically, a single sheet of rough HVS (Duslah) paper would contain 4 (four) double-sided copies of the currency image ...50,000, and the defendant sold the counterfeit money by having buyers come to the defendant's rented house.

Defendant I, Ridho Fahri, sold unfinished counterfeit currency to Defendant II, Epi Abdul Qodir, pursuant to a prior agreement wherein Defendant I would sell the counterfeit money—still in the form of uncut HVS paper sheets to Defendant II. Defendant II was to assist in the finishing process by cutting the counterfeit notes from the HVS sheets so they could be glued together to resemble genuine currency. Defendant I sold the material to Defendant II at a price of Rp10,000 in genuine currency per sheet of HVS paper. Over a period of three months, Defendant I produced counterfeit currency with a face value of approximately Rp300,000,000 (three hundred million rupiah), generating sales proceeds of approximately Rp30,000,000 (thirty million rupiah) in genuine currency and realizing a net profit of Rp15,000,000 (fifteen million rupiah). This matter was adjudicated in the Tasikmalaya District Court (Case No. 135/Pid.B/2016/PN.Tsm) involving Defendant I, Ridho Fahri (alias Budi bin Hanafi), and Defendant II, Epi Abdul Qadir bin Saprudin. The prosecutor charged both defendants under two alternative counts: the first based on Article 245 of the Criminal Code (KUHP), and the second based on Article 36 paragraph (3) of Law Number 7 of 2011 concerning Currency, which states: "Any person who circulates and/or spends Rupiah that they know to be Counterfeit Rupiah as referred to in Article 26 paragraph (3) shall be punished with imprisonment for a maximum of 15 (fifteen) years and a fine of a maximum of Rp50,000,000,000.00 (fifty billion rupiah)."

2. Analysis of Judges' Considerations on Continuing Acts and Concurrence of Criminal Offenses in Decision Number 135/Pid.B/2016/PN.Tsm

If among several acts, even though each constitutes a crime or violation, there is such a relationship between them that they must be regarded as one continuing act, then only one criminal provision is applied; if they differ, the one containing the most severe principal punishment is applied". Conversely, if each act of circulation is carried out separately and independently without a single unity of intent, then the application of the provisions regarding concurrence of criminal offenses needs to be considered. Furthermore R Soesilo also provides an explanation regarding continuing acts that in the case of this continued act (voortgezette handeling) only one criminal provision is imposed, namely the most severe one.[16] It is clear, from the explanation above, that the crime committed by the defendants viewed from the chronology to the legal facts presented at trial has lawfully and convincingly fulfilled the requirements as explained as a continuing act of circulating counterfeit banknotes. Therefore, before imposing a sentence, the judge needs to first determine the appropriate legal construction because it will affect the sentencing system applied. [17]

Thus it can be seen that it is less appropriate if the judge in imposing the sentence prefers the first alternative charge, because it is not in accordance with the provisions in Article 64 paragraph 1 (one). [9]This inaccuracy can be seen from the fact that the punishment in the first alternative charge using Article 245 of the Criminal Code is only imprisonment whereas in the second alternative charge using Article 36 paragraph 3 (three) of Law Number 7 of 2011 the punishment is more severe, because it consists of imprisonment and a fine. In this decision, the panel of judges focused its consideration more on the fulfillment of the elements of the offense charged in the first alternative charge without explicitly explaining the reasons why the series of acts of the defendants was not qualified as a continuing act or as a concurrence of criminal offenses. Several references also explain that the grounds for aggravating the punishment of a person who commits a crime include status as a civil servant, repetition of offenses, and a combination of or multiple offenses.[18] therefore the defendants should be punished more severely because clearly they did this not just once or twice but repeatedly and of course their actions have caused widespread public concernThe absence of such consideration causes the legal argumentation in the decision to be less comprehensive, especially regarding the facts at trial which indeed show the existence of more than one act of circulating counterfeit money. [19]

Academically, judges are indeed not obliged to discuss every theory of criminal law if the facts of the case do not support its application. However, if there are strong indications that the defendant committed several acts within a single course of intent or several independent criminal offenses, then considerations regarding Article 64 of the Criminal Code as well as Articles 63 through Article 71 of the Criminal Code should be explicitly explained. Such considerations are important to provide legal certainty, ensure transparency in judicial reasoning, and demonstrate the juridical basis in determining the form of criminal liability as well as the severity or leniency of the sentence imposed. In addition, the judge also did not explain whether the acts of the defendants met the characteristics of concurrence of criminal offenses (concursus).[20] The provisions of Articles 63 through Article 71 of the Criminal Code stipulate that if a perpetrator commits more than one criminal offense before there is a decision with permanent legal force, the judge is required to determine the form of concursus that occurred because this affects the sentencing system. The absence of an analysis regarding concursus causes the legal considerations to be less comprehensive, particularly since the facts at trial show the existence of several criminal acts each of which can stand independently.[21] Whereas if viewed from the perspective of sentencing theory, the judge's considerations also have not shown an analysis regarding the objectives of sentencing in cases related to crimes against the monetary system. Counterfeiting currency crimes not only cause individual losses, but.[22]

D. CONCLUSION

Based on the research findings and discussion, it can be concluded that the application of criminal law in Decision Number 135/Pid.B/2016/PN.Tsm has formally fulfilled the evidentiary provisions as regulated in the Code of Criminal Procedure. The panel of judges declared that the defendants were legally and convincingly proven to have committed the criminal offense of circulating counterfeit money based on the first alternative charge, then imposed a prison sentence of 1 (one) year 6 (six) months. The decision was based on the fulfillment of the elements of the criminal offense as charged through lawful evidence, witness testimony, physical evidence, and the judges' conviction. However, from the perspective of substantive criminal law, the judges' considerations still focus on proving the elements of the offense without comprehensively elaborating the legal construction of the series of acts committed by the defendants. In fact, based on an academic review of the same decision, there is a view that the case also needs to be analyzed in the context of continuing acts as referred to in Article 64 paragraph (1) of the Criminal Code as well as concurrence of criminal offenses (concursus) Determining whether an act constitutes a single criminal offense, a continuing act, or a concurrence of criminal offenses is an important part of the construction of criminal liability because it affects the basis for the application of law and the sentencing system. Therefore, the judges' considerations should not only be limited to the fulfillment of the elements of Article 245 of the Criminal Code, but should also explain the juridical reasons for not applying Article 64 of the Criminal Code or the provisions of Article 63 through Article 71 of the Criminal Code More comprehensive arguments would strengthen legal certainty, transparency of decisions, and the quality of legal reasoning in court decisions. In addition, in cases related to counterfeiting money and circulating counterfeit money, judges should also consider the broader objectives of sentencing, namely the protection of society (social defence), crime prevention (deterrence), as well as the protection of the stability of the monetary system. Thus, criminal decisions not only fulfill the aspects of legality and legal certainty, but also reflect a sense of justice, utility, and the effectiveness of law enforcement in dealing with crimes that affect the interests of the public and the state

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