



Allegations of A Cartel In Online Loan Services In The Enforcement of Business Competition Law

Zulkifli^{1*}, Wetria Fauzi²

^{1,2} Universitas Andalas, Padang, Sumatera Barat, Indonesia

*Corresponding author's email: wetriaufauzi@law.unand.ac.id

Article Info

Article History

Revised : 2025-11-04

Accepted : 2025-12-07

Published : 2025-12-14

Keywords:

Cartel; Online Loans;
Business Competition
Law

Abstract

The regulation of online loan interest rate determination in Indonesia is regulated in the Guidelines for the responsible provision of information technology-based money lending services issued by the Indonesian Joint Funding Fintech Association (AFPI) and the association has the authority based on statutory regulations to determine loan interest rates and other fees for business actors engaged in the online loan service sector. A cartel occurs when several business actors agree to regulate: interest rates, minimum/maximum loan limits, division of marketing areas or control of prospective debtor data. The Business Competition Supervisory Commission stated that AFPI and its members were involved in an alleged online loan interest rate cartel and an investigation has been conducted into the allegation. The investigation has found that there is an agreement to determine online loan interest rates carried out by AFPI and its members and the KPPU has also found 44 reported parties in this case and found evidence to strengthen the allegation including statements from the reported parties, witnesses or experts who have relevance to this case and other evidence. Synergy between institutions and the application of digital monitoring technology are the main keys to preventing the formation of cartels in the online loan sector.

Introduction

Economic development is a long, continuous process and undergoes significant changes compared to other sectors. Economic changes, in response to this aggressive development, have given rise to numerous developments in the financial sector. These developments impact the economic practices of business actors, who, in their efforts to expand their business lines, need to keep pace with increasingly complex financial developments as an alternative source of funding for their activities. This is driven by the fact that not all business actors have sufficient capital to maintain or expand their businesses, thus requiring alternative funding sources from external parties.

The dynamic nature of the financial sector has created numerous options for accessing funding to serve as sources of capital for entrepreneurs. This funding is available not only from banks but also from parties other than banks (non-bank financial institutions), offering easier access to funding compared to banks. These non-bank financial institutions create faster, easier, more flexible, and collateral-free access to technology-based funding services. These funding services are called Financial Technology, or Fintech. Fintech in society is dominated by the use of Funding Services Information Technology Based Loans (LPBBTI) or known as Online Loans or *Peer to Peer Lending*.

Online Loans or *Peer to Peer lending* is the provision of financial services to bring together lenders and borrowers in order to make loan agreements in rupiah currency directly through an electronic system that has a business license from the Financial Services Authority

(OJK).¹ However, along with the increasing use of online loans by the public, it has given rise to many polemics that are detrimental to the public as consumers of the funding services provided.

Recently, there has been a lot of discussion about the case of the Indonesian Joint Funding Fintech Association (AFPI) carrying out cartel actions in setting online loan interest rates with a flat interest of 0.8% per day from the actual loan amount received by consumers². AFPI is an organization that accommodates Fintech Peer to Peer Lending business actors appointed by the OJK as the official association of information technology-based money lending service providers in Indonesia.³ The case of the online loan interest rate cartel was motivated by an investigation carried out by the Business Competition Supervisory Commission on its initiative based on information that was developing in community and found that there were arrangements by AFPI to its 89 members regarding the determination of loan components to loan recipients. The meaning of a cartel in simple terms is an activity that can influence prices by regulating the production and/or marketing of goods or services, thus giving rise to monopolistic practices and/or unfair business competition as regulated in Article 11 of Law No. 5 of 1999 concerning the Prohibition of Monopolistic Practices and Unfair Business Competition (Law 5/1999)⁴. This action has the potential to violate Law 5/1999 because it is an action that can damage competition in the market.

Thus, the topic of discussion in this research is how to regulate the determination of online loan interest rates and which institutions are authorized to determine them, and how the KPPU stated that there is an alleged interest rate cartel in the online loan service sector.

Based on the description above, the formulation of the problem discussed is as follows.

- a. How are online loan interest rates regulated in Indonesia and which institution has the authority to set them?
- b. How did the KPPU state that there was an alleged interest rate cartel in the online lending services sector?

Research Purpose

Some of the objectives of this research are as follows;

- a. To know and understand the regulations for setting online loan interest rates in Indonesia and which institutions are authorized to set them.
- b. To know and understand the KPPU's statement regarding the alleged interest rate cartel in the online lending services sector.

Discucion

Regulations for setting Online Loan Interest Rates In Indonesia and Which Institutions Have the Authority to Set Them

Every economic activity carried out by economic business actors must legally be based on the provisions stipulated in Law 5/1999 and other related regulations, because the nature of

¹ Financial Services Authority, 2024, "Information Technology-Based Joint Funding Services (LPBBTI), [https://ojk.go.id/id/kanal/iknb/financial-technology/default.aspx#%3A~%3Atext%3DLayanan%20Pendanaan%20Bersama%20Berbasis%20Teknologi%20Informasi%20\(LPBBTI\)%2FPeer%2Dto%2Cuang%20rupiah%20secara%20langsung%20melalui](https://ojk.go.id/id/kanal/iknb/financial-technology/default.aspx#%3A~%3Atext%3DLayanan%20Pendanaan%20Bersama%20Berbasis%20Teknologi%20Informasi%20(LPBBTI)%2FPeer%2Dto%2Cuang%20rupiah%20secara%20langsung%20melalui), accessed on May 12, 2025 at 19.20 WIB

² Daily Economy Balance Sheet, 2023, "KPPU Reveal The existence of Poster Flower Pine nut", https://www.idx.co.id/StaticData/NewsAndAnnouncement/ANNOUNCEMENTSTOCK/From_EREP/2023/10/1a1fba2fb3_9f6f78e8af.pdf, accessed on May 12, 2025 at 19.34 WIB.

³ Indonesian Joint Funding Fintech Association (AFPI), 2020, "About AFPI", <https://AFPI.or.id/>, accessed on May 12, 2025 at 19.40 WIB

⁴ Lunita Jawani, 2022, "The Principle of the Rule of Reason Against Alleged Cartel Practices in Indonesia", Lex Renaissance Vol. 7, No. 1, hlm 32

this law is mandatory⁵. Therefore, it is mandatory to obey and comply with the applicable regulations in order to achieve people's prosperity, economic equality, and create a healthy competitive climate⁶. The massive development of the economic sector means that the law must be able to keep pace with these changes so as not to cause harm to society.

Law 5/1999 was established to serve as a reference and guideline for economic actors in conducting business activities, with the goal of healthy and conducive competition. Economic development is closely linked to advances in information technology, thus influencing the digital-based financial industry⁷. With the creation of a digital-based financial industry, it provides fast access to funding for the public, thus providing optimal contribution to society or business actors⁸. The development of the digital financial industry or so-called financial technology industry (*finansial techonology/fintech*) has had a significant impact, resulting in the rise of digital-based funding services (online loans). The existence of *Fintech* has given birth to a faster and more practical financial transaction process⁹.

Faster and more convenient financial transactions will increase the public's demand for online lending services. As online lending services become increasingly important to the public, the Financial Services Authority, as the independent body authorized to regulate and supervise financial institutions, deems it necessary to provide oversight and regulation of businesses providing online lending services¹⁰. As regulated in Article 4 of Law Number 21 of 2011 concerning the Financial Services Authority, the OJK was formed with the aim of ensuring that all activities in the financial services sector, namely:

1. Organized regularly, fairly, transparently and accountably;
2. Able to realize a financial system that grows sustainably and stably; and
3. Able to protect the interests of consumers and society

Due to this, an industry association was formed specifically to accommodate the development of the online lending industry, called the Indonesian Fintech Joint Funding Association (AFPI). In other words, AFPI was formed to assist the Financial Services Authority (OJK) in ensuring that the industry is safe and secure. *fintech* operates in accordance with applicable regulations and provides benefits to the public without harming the interests of consumers, who are particularly vulnerable. AFPI is an association that represents providers of information technology joint funding services, appointed by the Financial Services Authority as the official association of LPBBTI providers in Indonesia¹¹. The association has 100 licensed members operating in the productive, multipurpose, and sharia sectors. The association's vision and mission are aimed at promoting access to funding for inclusion through digital financial services. The basic principles for organizing activities by AFPI members, as outlined in the

⁵ Brigitte Dewinta, 2021, "*Legal Review of the Problems of Enforcing Competition Law in Creating Legal Certainty*", *Lec Administratum* Vol. IX, No. 3, hlm. 2

⁶ Mudawaroh, 2022, "*Legal Review of Alleged Monopolistic Practices by PT. X Through the Rule of Reason Approach in Connection with Law Number 5 of 1999 concerning the Prohibition of Monopolistic Practices and Unfair Business Competition*", *Journal of Islamic Social and Cultural Studies* Vol. 9, No. 1, p. 2.

⁷ Muhammad Arif Fahmi, et al., 2022, "*Competition Law Regulations for Digital Financial Services in Indonesia*", *Mimbar Yustitia* Vol. 6, No. 1, p. 5

⁸ Adi Setiadi, 2018, "*Protection of Lenders as Consumers and Responsibilities of Peer-to-Peer Lending Organizers in Peer-to-Peer Lending Activities in Indonesia*" *Journal of Legal Studies* Vol. 5, No. 1, p. 3.

⁹ Ahyadatul Khoiriyah and Miswan Ansori, 2024, "*The Role of Sharia Fintech Peer-to-Peer Lending in Increasing Access to Financing for MSMEs in Indonesia*", *Journal of Economics and Business* Vol. 4, No. 4, hlm. 3.

¹⁰ Hafiza Husna and Tetty Marlina, 2023, "*Consumer Protection Regarding Online Loan Cartels: Ibn Taymiyyah's Perspective*" *Journal of International Islamic Law, Human Right, and Public Policy* Vol. 1, No. 1, hlm 2.

¹¹ AFPI, 2020, "*About Us*", <https://AFPI.or.id/about>, visited on May 19, 2025, at 16.53 WIB

Code of Conduct, are as follows¹²

1. Product transparency and service product offering methods
2. Prevention of over-borrowing
3. Application of the principle of good faith.

AFPI also ensures that interest rates are regulated in the online lending financial technology industry, with special attention to consumer protection. Although the OJK is the agency that regulates both financial and non-financial institutions, in this regard...*fintech* OJK has not yet clearly regulated the maximum limit for interest charges.

In online loans and giving this authority to AFPI as an institution formed to regulate and supervise the ecosystem *fintech* healthy and trustworthy. However, as an authorized institution, the OJK only generally regulates online loans in Indonesia, as stipulated in Financial Services Authority Regulation Number 77/POJK.01/2016 concerning Information Technology-Based Lending and Borrowing Services, which has been amended to Financial Services Authority Regulation Number 10/POJK.05/2022 concerning Information Technology-Based Joint Funding Services (LPBBTI). Specifically, regarding the determination of the maximum amount of fees/interest charged, as stipulated in the Association Regulation dated November 5, 2021, which sets limits on interest, loan fees, and other charges.

These limits were issued by AFPI as the association of organizers *Fintech* to debtors at a rate of no more than 0.8% per day. However, the OJK, as the authority, does not regulate this interest rate. The interest rate set by AFPI is only regulated in a code of ethics developed and determined by the association itself¹³ With the regulation of these provisions, the online lending system becomes more positive and public trust increases, thereby protecting the public from high-interest lending practices or illegal online loans that are detrimental.

The KPPU (Commission for the Supervision of Public Companies) Alleges There is an Interest Rate Cartel in the Online Lending Services Sector

The Business Competition Supervisory Commission (KPPU) is a state institution that is established independently and free from the influence of government interests and other parties as stated in Article 34 paragraph (1) of Law 5/1999. The establishment of the KPPU is to be an institution that supervises the implementation of legal regulations or the implementation of Law 5/1999 and other implementing regulations so that they can be applied effectively according to the principles and objectives as well as legal certainty in society towards the massive economic activities. The establishment of this institution, the KPPU has quite broad duties and authorities not only limited to supervising and assessing business actors, but also has the authority to conduct examinations accompanied by sufficient and reasonable examination evidence¹⁴. Due to its authority, the KPPU conducted an investigation into alleged violations of Law 5/1999 and in this case, the KPPU discovered alleged online loan interest rate cartels carried out by business actors who carry out business activities in providing online loan services to consumers.

On October 4, 2023, based on KPPU Press Release No. 50/KPPU-PR/X/2023, the KPPU issued a press statement alleging an online loan interest rate cartel. The discovery of the online loan interest rate cartel case was prompted by a preliminary investigation initiated by the KPPU into alleged regulation and fixing of loan interest rates for consumers. as recipients of online loan funds provided by business actors affiliated with AFPI. After investigating the alleged

¹² AFPI, 2021, "Guidelines for Responsible Conduct in Providing Information Technology-Based Joint Funding Services", <https://afpi.or.id/about/code-of-ethics>, visited on May 20, 2025 at 8:23 PM WIB

¹³ Kevin Septian and Hariyo Sulistiyantoro, 2023, "Efforts to Ensure Transparency of Interest Rates in Online Loan Agreements for Loan Recipients" *Wahana Pendidikan Scientific Journal* No. 9, Vol. 18, p. 6

¹⁴ Gloria Damaiyanti, 2021, "Legal Certainty of the Business Competition Supervisory Commission's Decisions in Enforcing Business Competition Law" *Lex Renaissance* Vol. 6, No. 1, hlm. 2

case, the KPPU, based on its authority, formed a task force to address the issue.

The initial investigation conducted by the KPPU began with information from the public regarding the online lending financial sector. Then, a task force formed by the KPPU discovered arrangements by the Indonesian Financial Services Association (AFPI) for its members regarding the determination of loan components to consumers, specifically the determination of interest rates at a flat rate of 0.8% per day of the principal amount of the loan received by consumers. Because these arrangements were made by AFPI, it was found that all 89 AFPI members registered in the year the investigation was discovered were following these arrangements. If this act is true and the investigation suspects such, then as an institution with the authority to assess, the KPPU issued a statement stating that this has the potential to violate Law 5/1999¹⁵.

On October 27, 2024, the KPPU (Commission for the Public Prosecution Service) released another press release stating that the online loan case had progressed to the investigation stage following an initial inquiry. This stage yielded findings that led the KPPU to determine that there were 44 (forty-four) online loan service providers or business actors.

As the Reported Party for alleged violation of Article 11 of Law 5/1999 concerning price-fixing cartels. At this stage, information was also obtained that AFPI had issued a Code of Conduct for Responsible Online Lending Services, which stipulates that the total amount of loan interest and other fees (excluding late payment fines) should not exceed a flat rate of 0.8% per day. Prior to the issuance of these guidelines, online loan interest in 2021 was no more than 0.4% per day, and each member was required to sign an integrity pact to comply with the existing guidelines.

Every business actor who carries out a prohibited legal act, in this case a cartel in Law 5/1999, will receive sanctions if proven legally and convincingly guilty of violating the law because in principle, cartels are prohibited because they will disrupt healthy market competition and can give rise to unhealthy competition¹⁶. With healthy competition in the market, the balance and stability of economic activity in the market will be efficient and able to provide economic choices to consumers. Including in this case, if healthy competition is present in the market, the determination of loan interest rates will vary and provide the opportunity for borrowers to determine their choices balanced by the facilities provided. However, when this is not realized, there is a violation of consumer rights, which rights should be considered by business actors.

The latest information has been conveyed by the KPPU in Press Release No. 020/KPPU-PR/IV/2025 dated April 25, 2025, which states that the case of the alleged online loan interest rate cartel has entered the Preliminary Examination Panel Hearing stage¹⁷. Explanation of cartels Based on Article 11 of Law 5/1999, it states that business actors are prohibited from making agreements with competing business actors, which are intended to influence prices by regulating the production and/or marketing of goods and/or services, which can result in monopolistic practices and/or unfair business competition. This article aims to prove whether or not there is a violation of an act by using an approach. *Rule of Reason*.

Approach *Rule of Reason* is a legal approach used in competition law to see the extent of the negative impact of actions carried out by business actors on the market competition

¹⁵ Business Competition Supervisory Commission, 2023, "KPPU Press Release No. 20/KPPU-PR/X/2023 KPPU Conducts Initial Investigation into Alleged Interest Rate Cartel by the Indonesian Joint Funding Fintech Association (AFPI)", https://kppu.go.id/wp-content/uploads/2023/10/Siaran-Pers-No.-50_KPPU-PR_X_2023.pdf, visited on May 20, 2025 at 11:22 WIB

¹⁶ Oti Handayani and Adi Sulistiyono, 2020, "Fintech Legal Entity as an Instrument for Regulating Healthy Business Competition", Legal Issues Vol. 49, No. 3, p. 224

¹⁷ Business Competition Supervisory Commission, 2025, "KPPU Press Release No. 020/KPPU-PR/IV/2025 KPPU Hears IDR 1,650 Trillion Loan Case", https://kppu.go.id/wp-content/uploads/2025/04/Siaran-Pers-No.-020_KPPU-PR_IV_2025.pdf, visited on May 20, 2025 at 19:22 WIB

system. If these actions have a significant impact so that they hinder and/or disrupt market competition, then action must be taken to enforce the law as stated in Law 5/1999. To determine whether an article in Law 5/1999 adheres to the principle of this approach, it can be seen from the wording of the articles, if there is an inclusion of the words "which can result in" and/or "reasonably suspected", then the article needs to be examined in depth to see whether the actions in question give rise to monopolistic practices and/or result in business competition that is unhealthy so it is necessary to use this approach¹⁸. Article 11 of Law 5/1999 contains the words "which may result in" so it can be concluded that to prove the existence of an alleged cartel in a society, this approach is used.

The allegation of an online loan interest rate cartel submitted by the KPPU needs to be examined to see whether or not the elements in Article 11 of Law 5/1999 are fulfilled, which will be explained as follows:

- a) Regarding the element "Business actors are prohibited from making agreements with their competing business actors." This can be seen in the KPPU Press Release dated
- b) On October 27, 2023, it was announced that based on an investigation conducted by AFPI as an association, it issued a code of conduct for all members, which stipulates that the total amount of loan interest and other fees should not exceed a flat interest of 0.8% per day, calculated from the principal amount of the loan;
- c) Regarding the element "intending to influence prices by regulating the production and/or marketing of goods and/or services," the KPPU Press Release dated April 29, 2025, stated that based on an in-depth investigation, business models, market structures, and patterns of interconnectedness among players in the online lending industry were discovered, reinforced by allegations of ownership affiliations or relationships between business actors for their own interests and profits related to the online lending platform. The existence of such actions will result in consequences that violate consumer rights and violate the market competition ecosystem.
- d) Regarding the element "which may result in monopolistic practices and/or unfair business competition," the KPPU's statement dated October 27, 2023, regarding the results of its investigation, also found that the regulatory objectives in the AFPI code of conduct regarding the determination of loan interest rates and other fees were carried out unfairly for loan recipients and the lack of service options for consumers with different rates and facilities, so that consumers seemed forced to choose services from any business actor because the business provisions and business patterns were the same.

In addition to looking at the elements of the article to justify the cartel allegation, the KPPU stated that it had identified the reported parties involved and had summoned the parties, including the reported parties, witnesses or related experts, in order to gather sufficient evidence.

Thus, based on the explanation above, the alleged online loan interest rate cartel meets the elements of the article, but further evidence is still needed until a violation is proven, as stated in the verdict of this case. If the verdict finds the perpetrators guilty, then under Law 5/1999, the businesses involved will face sanctions as stipulated in that regulation.

Conclusion

The regulation on setting online loan interest rates in Indonesia is regulated in the Code of Conduct for Responsible Information Technology-Based Lending Services issued by the Indonesian Joint Funding Fintech Association (AFPI). The association has the authority, based on statutory regulations, to set loan interest rates and other fees for business actors operating

¹⁸ Supianto, 2013, "*Per Se Illegal and Rule of Reason Approaches in Competition Law in Indonesia*", Jurnal Rechtsens, Vol. 2, No. 1, p. 4

in the online lending services sector.

The Business Competition Supervisory Commission (KPPU) has stated that AFPI and its members are involved in an alleged online loan interest rate cartel and has launched an investigation into the allegations. The investigation has revealed an agreement to fix online loan interest rates between AFPI and its members. The KPPU has also identified 44 defendants in this case and gathered evidence to support the allegations, including statements from the defendants, witnesses, or experts relevant to the case, and other evidence.

Reference

- AFPI, 2020, "About AFPI", <https://AFPI.or.id/>, accessed on May 12, 2025 at 19.40 WIB.
- AFPI, 2020, "About Us", <https://AFPI.or.id/about>, visited on May 19, 2025, at 16.53 WIB.
- AFPI, 2021, "Guidelines for Responsible Conduct in Providing Information Technology-Based Joint Funding Services", <https://afpi.or.id/about/code-of-ethics>, visited on May 20, 2025 at 20.23 WIB.
- Business Competition Supervisory Commission, 2023, "KPPU Press Release No. 20/KPPU-PR/X/2023 KPPU Conducts Initial Investigation into Alleged Interest Rate Cartel by the Indonesian Joint Funding Fintech Association (AFPI)", https://kppu.go.id/wp-content/uploads/2023/10/Press-Release-No.-50_KPPU-PR_X_2023.pdf, visited on May 20, 2025 at 11:22 WIB.
- Business Competition Supervisory Commission, 2023, "KPPU Press Release No. 020/KPPU-PR/IV/2025 KPPU Convene Things Pine nut RP 1.650 Trillion", https://kppu.go.id/wp-content/uploads/2025/04/Siaran-Pers-No.-020_KPPU-PR_IV_2025.pdf, visited on May 20, 2025 at 19.22 WIB.
- Damaiyanti, Gloria, 2021, "Legal Certainty of the Business Competition Supervisory Commission's Decisions in Enforcing Business Competition Law" *Lex Renaissance* Vol. 6, No. 1.
- Dewinta, Brigitte, 2021, "Legal Review of the Problems of Enforcing Competition Law in Creating Legal Certainty", *Lec Administratum* Vol. IX, No. 3.
- Fahmi, Muhammad Arif, et al., 2022, "Competition Law Regulations for Digital Financial Services in Indonesia", *Mimbar Yustitia* Vol. 6, No. 1.
- Financial Services Authority, 2024, "Information Technology-Based Co-Funding Services (LPBBTI)", [https://ojk.go.id/id/kanal/iknb/financial-technology/default.aspx#:~:text=Joint%20Funding%20Information%20Technology%20\(LPBBTI\)%20FPeer%20to,uang%20rupiah%20directly%20through](https://ojk.go.id/id/kanal/iknb/financial-technology/default.aspx#:~:text=Joint%20Funding%20Information%20Technology%20(LPBBTI)%20FPeer%20to,uang%20rupiah%20directly%20through), accessed on May 12, 2025 at 19.20 WIB.
- Handayani, Oti and Adi Sulistiyono, 2020, "Fintech Legal Entity as an Instrument for Regulating Healthy Business Competition", *Legal Issues* Vol. 49, No. 3.
- Husna, Hafiza and Tetty Marlina, 2023, "Consumer Protection Regarding Online Loan Cartels: Ibn Taymiyyah's Perspective" *Journal of International Islamic Law, Human Right, and Public Policy* Vol. 1, No. 1.
- Jawani, Lunita, 2022, "The Principle of the Rule of Reason Against Alleged Cartel Practices in Indonesia", *Lex Renaissance* Vol. 7, No. 1.
- Khoiriyah, Ahyadatul and Miswan Ansori, 2024, "The Role of Sharia Fintech Peer-to-Peer Lending in Increasing Access to Financing for MSMEs in Indonesia", *Journal of Economics and Business* Vol. 4, No. 4.
- Mudawaroh, 2022, "Legal Review of Alleged Monopolistic Practices by PT. X Through the Rule of Reason Approach in Connection with Law Number 5 of 1999 concerning the Prohibition of Monopolistic Practices and Unfair Business Competition", *Journal of Islamic Social and Cultural Studies* Vol. 9, No. 1.
- Neraca Economic Daily, 2023, "KPPU Reveals the Existence of a Loan Interest

Cartelhttps://www.idx.co.id/StaticData/NewsAndAnnouncement/ANNOUNCEMENTSTOCK/From_EREP/202310/1a1fba2fb3_9f6f78e8af.pdf, accessed on May 12, 2025 At 19.34 WIB

- Septian, Kevin and Hariyo Sulistiyantoro, 2023, “*Efforts to Ensure Transparency of Interest Rates in Online Loan Agreements for Loan Recipients*”Wahana Pendidikan Scientific Journal No. 9, Vol. 18.
- Setiadi, Adi, 2018, “*Protection of Lenders as Consumers and Responsibilities of Peer-to-Peer Lending Organizers in Peer-to-Peer Lending Activities in Indonesia*”Journal of Legal Studies Vol. 5, No. 1.
- Supianto, 2013, “*Per Se Illegal and Rule of Reason Approaches in Competition Law in Indonesia*”,Jurnal Rechtsens, Vol. 2, No. 1.