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Collaborative Efforts in ASEAN for Global Asset Recovery Frameworks to Combat Corruption in the Digital Era

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Abstract

In the contemporary digital age, corruption has evolved into a common enemy, transcending borders and becoming a transnational and extraordinary crime. Within the ASEAN framework, corruption is no longer perceived as the concern of a single nation but as a shared threat to all member states and the global community at large. Despite the pervasive and deeply entrenched nature of corruption, concerted efforts have been made to combat this scourge. Among these measures, asset recovery stands out as an extraordinary tool, addressing not only the prevention and enforcement aspects but also the crucial task of repatriating ill-gotten gains to their rightful country of origin. Indonesia and the ASEAN community have entered into various treaties aimed at facilitating asset recovery, with the ASEAN Mutual Legal Assistance Treaty (AMLAT) serving as a pivotal legal instrument in this endeavor. Recognizing the transnational nature of corruption, interstate relations, and diplomatic cooperation have assumed a vital role in supporting the success of asset recovery processes. This study explores the evolving landscape of corruption in the digital age, its transformation into a transnational concern, and the collective efforts undertaken within ASEAN to combat it. By focusing on asset recovery as an extraordinary measure, it sheds light on the multifaceted dimensions of eradicating corruption and emphasizes the importance of international collaboration in returning misappropriated assets to their rightful owners.

INTRODUCTION

Corruption, once considered solely an Indonesian issue, has evolved into a universal problem that plagues countries worldwide, defying easy eradication. This global menace not only affects economic aspects but also intertwines with political dynamics, power structures, and the efficacy of law enforcement systems. The progression of corruption in Indonesia, both in terms of its scope and complexity, can no longer be confined to traditional criminal behavior (Jaya, 2006). Today, corruption has transcended its domestic boundaries to become a transnational phenomenon, drawing attention from scholars and policymakers alike (Albanese, 2018; Marquette & Peiffer, 2021; Prakasa, 2019).

In this digital age, where technology facilitates both the perpetration and detection of corrupt activities, the need for comprehensive legal reforms becomes increasingly evident. Corruption's adaptability to new technologies and its capacity to exploit the digital realm underscores the urgency of updating legal frameworks and law enforcement strategies (Andini et al., 2023). This paper delves into the universality of the corruption challenge, highlighting its multifaceted impact on societies and governance structures globally. It underscores the imperative for nations to unite in their efforts to combat corruption, emphasizing the critical role of legal reforms in this endeavor. As corruption knows no borders and thrives in the digital age, it is essential for nations to adopt collaborative approaches and adapt their legal systems to effectively address this enduring threat (Obe & Nay, 2022; Prastyono, 2020; Wijayanto et al., 2021). This paper explores the interconnectedness of corruption, legal reforms, and the digital age, recognizing the importance of international cooperation in the fight against corruption as it continues to evolve and permeate societies worldwide. In the context of Indonesia, corruption has permeated society to a profound extent, manifesting as pervasive and deeply entrenched activities that have the potential to precipitate the self-destruction of the nation (Aninda, 2017; Hidayat et al., 2020; Prakasa, Satria, 2022; Ramadhan, 2017).

On a global scale, corruption was acknowledged as a very complicated, systematic, and pervasive issue. Corruption, according to the Center for Crime Prevention (CIPC), is the improper use of (public) power for personal gain. Additionally, it is acknowledged that corruption encompasses a wide range of behaviors, including bribery, theft, fraud, extortion, abuse of authority, insider trading exploiting a conflict of interest, nepotism, unlawful commissions, and contributions of illicit funds to political parties (Arifin et al., 2019; Boateng et al., 2021; Jancsics, 2019; Pertiwi, 2022). This signifies that corruption has evolved into a ubiquitous adversary and an extraordinary offense. It has convincingly transformed from being a localized issue into a transnational menace with repercussions for all societies and economies. Consequently, international collaboration becomes imperative for its prevention and containment and it is necessary to take an extraordinary measure on its eradication.

One of the extraordinary measures to fight against corruption is the asset recovery. The corruption eradication dimension not only embraces preventive actions and law enforcement but also returns the assets. However, in many conditions, recovering the assets presents a considerable challenge. Ginting (2012) see asset tracking as a complex problem because tracking the asset is never easy, let alone returning them. Therefore, the developing countries where grand corruption has taken place are affected by these conditions.

Some previous cases provide numerous examples and data of corruptors who save and run away with their assets to other countries. The General Attorney said that Gayus Tambunan, the corruptor in the taxation mafia case, kept his assets in four countries in the form of gold equal to USD 74 billion, the U.S. dollar, and the Singapore dollar. Similarly, Nazaruddin's corruption case involved assets of USD 5 million, 2 million Euro, and 3 million SGD hidden in Singapore. Meanwhile, in the case of Hendra Rahardja—BLBI case—it is estimated that around USD 493,647 of assets are stored in Australia.

Another case of Robert Tantular involves Bank Century assets of as much as Rp. 6 trillion which Robert Tantular was alleged to have rushed to Hongkong with the assets (Dzulfaroh & Hardiyanto, 2020). Soeharto's assets valued between USD 13-35 billion left in many other countries still cannot be repatriated to Indonesia (Arifin et al., 2016).

This condition indicates the importance of asset recovery for Indonesia, and also for other members of ASEAN. This paper intends to investigate some problems in the practice of asset recovery within ASEAN as the framework of cooperation against corruption.

METHODS

To investigate global frameworks on asset recovery within the context of ASEAN's collective efforts to combat corruption, a multi-faceted research approach is recommended. This entails conducting a thorough literature review encompassing academic articles, policy documents, and international agreements, alongside case studies of ASEAN member states to evaluate their experiences with asset recovery and anti-corruption endeavors. Data collection encompasses financial and legal documentation related to asset recovery, as well as corruption indices and rankings within the region. Interviews and surveys with diverse stakeholders, legal and policy analyses, and comparative assessments of ASEAN's strategies against global best practices should be integral to the research. Employing quantitative and qualitative methods for in-depth analysis (Al-Fatih & Siboy, 2021) should lead to actionable recommendations and policy insights, all culminating in a comprehensive research report for dissemination among relevant stakeholders.

RESULTS AND DISCUSSION

Asset Recovery in the Shadow Practices: The Complexity of Repatriating the Money in the Digital Age in ASEAN

Asset recovery—as outlined in the UN Convention against Corruption (UNCAC chapter V)—refers to the process by which the proceeds of corruption transferred abroad are recovered and repatriated to the country from which they were taken or to their rightful owners. Asset recovery, also known as investment or resource recovery, is the process of maximizing the value of unused or end-of-life assets through effective reuse or divestment (Suryosumpeno, 2020; Suud, 2020). In other words, asset recovery in the case of corruption, was not for individual interest but interstate interest because asset recovery involves one or many states as shown by many previous cases.

On the other hand, when it comes to the recovery of assets involving Indonesia and other nations, the legal framework assumes paramount significance. As highlighted by Harris (2004), law is an essential element in society, and the existence of a legal system is imperative for regulating the interactions among its constituents. In simpler terms, this implies that Indonesia and fellow ASEAN member states necessitate a collective consciousness and formal agreements as the overarching legal mechanisms binding all members together.

Indonesia has many legislations that regulate corruption and asset recovery itself. The fundamental legal principles guiding asset recovery efforts can be found in Law No. 20/2001, Law No. 31/1999 concerning the eradication of corruption, Law No. 7/2006 concerning the ratification of the UNCAC in 2003, Law No. 1/2006 concerning mutual assistance in criminal matters, Law No. 8/2010 concerning money laundering, as well as the Criminal Code and Criminal Procedure Code. The primary objectives of Law No. 1/2006 concerning the ratification of the UNCAC are to improve and empower all efforts to prevent and eradicate corruption more efficiently and effectively, as well as to enhance, facilitate, and support international cooperation and technical assistance for such purposes, including asset recovery. It also improves integrity and accountability and manages problems and public wealth carefully (Arifin, 2014; Brunelle-Quraishi, 2011; Hidayatulloh et al., 2022). Those laws serve as guidance for us to understand how asset recovery is regulated, and the most important is that, in practical area, it is always linked by international scope with the role or the assistance of asset recovery (J Ginting, 2011).

The support and function outlined in the international asset recovery instrument must be viewed as a non-law enforcement activity, thereby only involving non-coercive measures. This allows law enforcers to freeze and seize looted assets. This action is exclusively under the rule of municipal legislation of the relevant state, and the assets are subject to execution by a law enforcement organization.

The dimension of asset recovery could be analysed from the perspective of criminal law or civil law (Sobko et al., 2023). In Italy, Ireland, and the United States,

for example, civil code procedure is commonly used for asset recovery involving the confiscation the assets (Brun et al., 2021; Mulyadi, 2015). Depending on the circumstances, nations including Italy, Ireland, and the United States permit the civil or preventative seizure of assets allegedly gained from certain criminal activity. Such forfeiture rules do not call for *beyond a reasonable doubt* proof of illicit origin, unlike confiscation in criminal proceedings. Instead of relying on proof based on a balance of probabilities, this procedure emphasizes a high probability of illicit origin coupled with the owner's incapacity to disprove it (Zolkaflil et al., 2023). Besides criminal and civil procedure at the court, sometimes asset recovery effort takes place voluntarily like in Abdullah Puteh's case (Cahyandhi, 2019).

Further, UNCAC which was ratified with Law No.1/2006 defines and states about asset recovery in Chapter V, Art. 51-58, and it sets forth the basic principles that become the member states' goals to widely serve the cooperation and assistance about this condition. UNCAC uses the restorative approach to all members and has made a breakthrough in asset recovery which includes the prevention and detection system proceeds of corruption, the direct system of asset repatriation, the indirect system of asset recovery, and international cooperation for purposes of confiscation (Iqra et al., 2021). Furthermore, UNCAC also highlights that each State Party shall, in accordance with its domestic law, take the following actions: (a) Take any steps that may be necessary to allow another State Party to file a civil action in its courts to establish title to or ownership of property acquired through the commission of an offense outlined in this Convention; (b) Take any steps that may be necessary to allow its courts to order those who have committed offenses outlined in this Convention to pay a fine; and (c) Take whatever steps may be required to enable its courts or competent authorities to accept another State Party's allegation as the conduct of an offense defined in accordance with this Convention when making a confiscation decision.

In the further context, the provisions of Article 53 of the UNCAC 2003, according to Mulyadi (2015), show that the asset recovery system can be done directly in three ways, namely: *First*, the obligation of each State Party to this Convention to provide the legal means to other countries in order to file a civil action to the local state courts as well as establish the ownership of the property which has been acquired from the corruption offenses as set forth in this Convention. This aspect is limitedly set out in Article 53 point (a) UNCAC 2003; *second*, giving permission to the local state court to order the perpetrators of corruption to pay compensation or damages to other countries harmed by the violation (Article 53 (b) UNCAC 2003); *third*, taking action to allow local courts or competent authorities to also recognize a third-party claim of ownership of the assets to be conducted foreclosure.

Fleming views that, *first*, the asset return involves revocation, seizure, and removal; *secondly*, the revoked, seized, and removed assets were gained from a criminal act; *third*, the revocation, seizure, and removal of assets are intended to minimize another

criminal chance that may result from the benefits gained from the crime committed earlier (Fleming, 2007, 2008).

Asset return that is performed under a law enforcement system allows the aggrieved state to seize and return the property proceeds of the corruption perpetrators through a series of processes and mechanisms. In terms of either criminal or civil scopes, assets located inside and outside the country are stored, tracked, frozen, confiscated, and returned to the aggrieved state affected by corruption, to restore the financial losses due to corruption (Anggraeny, 2020). This measure is also aimed at deterring corruptors (Jamin Ginting & Talbot, 2023; Utama, 2021). In the same context, in the digital age, where financial transactions and asset-hiding have become increasingly sophisticated, the need for a robust and technologically adept asset recovery framework is more critical than ever. This comprehensive approach contributes not only to the restoration of stolen assets but also to the preservation of the rule of law and the prevention of future corruption (Ariefulloh et al., 2023; Manthovani, 2023; Wronka, 2022; Wulandari & Dermawan, 2022).

The essential provisions are important in the context of returning assets of the custodial state to the country of origin. Asset recovery through international cooperation gives the normative justification of International Cooperation itself, which includes the provisions on extradition, mutual assistance in criminal matters, transfer of proceedings, transfer of sentenced person, and joint investigation. Implementation of this dimension indicates that the Government of Indonesia has ratified extradition agreements with the Governments of South Korea, Malaysia, Australia, Thailand, Hong Kong, and the Philippines and has ratified the treaties on mutual legal assistance in criminal matters with the Australian Government.

In addition, Law No.1/2006 on Mutual Legal Assistance specifies that the Ministry of Law and Human Rights is the Central Authority implies that requests for assistance must be made by the Minister directly or through diplomatic channels in response to a question from the Attorney General or the Chief of the Indonesian National Police (Kapolri), or the case of corruption, with the Chair of the Corruption Eradication Commission (KPK). Procedures for making requests differ among institutions included in the statute, with some being more clearly regulated than others.

The articles outline multiple processes that must be completed before creating or even submitting a request for assistance. Although the KPK handles fewer cases overall than the Indonesian National Police (INP) or the Attorney General's Office (AGO), it nonetheless has a small caseload. The investigating officers may start a request during the pre-investigation or investigation stage when assets have been identified and located and there is concern about their disappearance. The supervisors, the head of the unit, the director, and the deputy head of the criminal investigation division all evaluate and provide their permission before the letter from the chief of

INP to the central authority is issued. Before a formal letter is signed and given to the Central Authority, the internal review process requires extensive paper efforts.

The necessity to take assets comes during the prosecution stage; however, assets may be discovered during the investigative stage as well. After assessment by the Deputy Attorney General for Special or General Crimes and with some assistance from the Legal Bureau, the prosecutors for the case must make the request to either the District Attorney or the Attorney General. Through court orders that must be carried out internationally, the court may also order the confiscation and forfeiture of assets. The Attorney General will submit a letter to the Central Authority in this situation requesting that other nations abide by Indonesian court orders.

In further discussion, it is evident that the asset recovery procedure engages not merely a single entity but a multitude of stakeholders, all of whom significantly influence the outcome of such recovery efforts. In this context, when contemplating the establishment of a national asset recovery system, it becomes imperative to scrutinize a minimum of three fundamental elements, as delineated by Friedman's theoretical framework. *First*, in terms of the law substance for asset recovery, it is related to the provision on asset recovery as outlined in the chapters, articles, and verses. Substantive elements must consider various aspects of the legal approach that includes a variety of areas of law, whether criminal, civil, tax or other corporate. Besides, it also should pay attention to developments in relevant international law, especially regarding the International Convention against corruption, transnational crime, and international legal instruments (Rahman & Anam, 2020). *Second*, in terms of the elements of legal structure that involve agencies or institutions that specifically address the issue of asset recovery, in this case, ASEAN does not have a special institution for this like Asset Recovery Agency (ARA) in the UK. Elements of this structure should be built as a strong authority and free from the influence and intervention of any power, including political power. *Third*, it takes into account the elements of legal culture such as awareness and commitment for law enforcement, the government administrator, and the state.

International Law Instrument on Asset Recovery within ASEAN

International collaboration has two different sorts of legal frameworks: treaty-based and non-treaty-based. In terms of treaties, there are multilateral conventions and agreements like the UNCAC (United Nations Conventions against Corruption), the OECD Anti-Bribery Convention, and the AMLAT (ASEAN Mutual Legal Assistance Treaty) as well as bilateral treaties. MLA provisions are used in domestic legislation by nations that are not treaty-based.

Using multilateral conventions, multilateral and bilateral treaties, or agreement negotiation as tools to request legal assistance is time-consuming and resource-intensive, needing legal formalities that may prolong the execution of the request and in some cases make it quite slow, and could potentially jeopardize the confidentiality

of the case or sensitive information. Therefore, an informal approach should be used in conjunction with multijurisdictional investigations. In dealing with official approaches like extradition and MLA, it serves as a transitional phase. This idea is well-recognized in global best practices for managing global inquiry procedures.

The informal approach can be used for a variety of non-coercive actions, such as exchanging information and preliminary evidence for investigation leads, providing non-sensitive data like immigration records and open-source information, tracing property and non-financial records, getting information on investigation leads, finding the man-hunt, and more. To get assistance with utilizing coercive measures from another jurisdiction, such as arresting, repatriating assets, acquiring bank records, obtaining evidence for legal proceedings, freezing and seizing assets, etc., we have to apply through a formal channel.

While the gravity of domestic law enforcement procedures must be in place, the informal approach strategy and goodwill of the requested party are two of the most crucial factors in accelerating the process of overseas assistance, such as MLA and extradition. In contrast to non-cooperative jurisdiction, which results in the reverse, the goodwill of the requested party creates a simpler and faster procedure for the requesting party. The majority of recalcitrant jurisdictions are unwilling to assist and conceal their poor commitment through their legal system. For the sake of their own national interest, the uncooperative jurisdiction has a vested interest in harboring the proceeds of crime. Law enforcement considers this interest unacceptable because all individuals and organizations that support crime are also deemed to be criminals.

Therefore, it is crucial that the international community take appropriate action to address this issue and implement a blacklist of unwilling states in the system of international legal assistance. The ideal legal structure to resolve this issue is the UNCAC review mechanism. The multi-jurisdictional connection in dealing with corruption should be governed by the review process, and it should develop monitoring methods to make sure the assistance other parties seek is treated seriously and correctly.

Recently, in further discussion, the role of intelligence cooperation within multilateral networks such as Interpol, ACA (Anti-Corruption Agency) networks like the International Association of Anti-Corruption Authorities, OECD law enforcement group, Edgmont group, Euro Just, Corruption Hunter Networks, and SEA-PAC (South East Asia Parties against Corruption) is crucial and significant. When it comes to handling and exchanging information in criminal matters, such as anti-money laundering, anti-corruption, and other forms of data and information exchange cooperation, intelligence cooperation has changed from its negative Cold War image of undermining other jurisdictions' interests to a positive bilateral relationship. The criminals could be stopped via effective intelligence cooperation and networks among law enforcement agencies worldwide.

In some cases, law enforcement networks are the only ones capable of thwarting organized, networked corruptors. Criminals operate through their own networks and need the assistance of relevant authorities and resources. The key to winning the fight is networking. The greatest law enforcement organizations in the world, such as the FBI in the United States, SFO in the United Kingdom, and ICAC in Hong Kong, as well as KPK, implement a cooperative strategy to build reliable networks. Easy access to information, a willingness to assist the process, efficiency, and effectiveness in reaching the outcome, maintaining a cooperating witness, and speeding up the procedure are all results of good collaboration. The FBI's slogan, "*Cooperation is the most effective weapon against crime*," conveys the importance of cooperation in a more general sense. Therefore, cooperation and the FBI's remarkable operational success are strongly correlated.

Strong cooperation between the ASEAN can be seen from informal cooperation between other institutions of states, for example, KPK was the role of international collaboration on South East Asia Parties against Corruption (SEA-PAC), Cooperation SEA-PAC is a group of anti-corruption agencies in the countries of Southeast Asia, namely: Anti-corruption Bureau (ACB) of Brunei Darussalam, the Corruption Eradication Commission (KPK) Indonesian, Malaysian Anti-Corruption Commission (MACC), Corrupt Practices Investigation Bureau (CPIB) Singapore, the Anti-Corruption Unit (ACU) Cambodia, the Office of the Ombudsman (OMB) the Philippines, the National Anti-Corruption Commission (NACC) of Thailand, Vietnam Government Inspectorate (GIV), and the State Inspection Authority (SIA) Laos, which has a mission to combat cross-country corruption. Through cooperation with SEA-PAC, members can exchange information and data, a joint investigation, asset tracking, exchange of evidence and witnesses, and the process of mutual legal assistance in criminal matters (MLA), to support the acceleration of the process of returning fugitive.

Within the ASEAN and international community, national police also have an important role in asset recovery especially for international cooperation itself. National Central Bureau (NCB) Interpol Indonesia in the ASEAN community worked together with the ASEANAPOL, like the police community in the ASEAN. We also have the International Foreign Law Enforcement Community (IFLAC) which serves as a forum of law enforcement official chiefs in Indonesia.

In the effort of asset recovery within ASEAN, the UNCAC that was ratified by each member was involved, and so was the MLA, in this case, AMLAT, as mentioned previously. AMLAT, as the treaty, is used as a legal instrument in the asset recovery procedure. International cooperation, informal relations, and bilateral agreements also become the success factors affecting asset recovery.

The Problems and Alternative Solutions

Problems occurring in asset recovery within ASEAN are not only about the diplomatic relationship but also about the agreements and treaties. Some problems also show that asset recovery is not as easy as thought because it also involves political interest, financial state, and money. The problems also vary and are affected by many factors. One of the factors is that, as Dutcher (2005) said, white-collar crime is almost related to money flow not only involving just one party but also the organization of various activities like fraud, markup, and even money laundering.

In terms of legal substance, one significant issue arises from the inadequacy of rules. Despite Indonesia's ratification of the UNCAC, the regulations governing asset recovery lack clarity and specificity. Additionally, the disparities in legal systems between Indonesia and the relevant states pose a challenge. In the same context, it is also highlighted that while differing legal systems can present challenges in asset recovery cases, political and diplomatic relations often play a pivotal role in facilitating the process, as exemplified by Indonesia's engagement with Papua New Guinea (Bureni, 2016; Mahmud, 2018; Saputra, 2017; Sigalingging, 2021),

Even though ASEAN already has MLA in criminal matters that was ratified by Indonesia by Law No.15 of 2008, this condition applies the non-retroactive principle. Therefore, it was difficult for Indonesia to track and return the assets before 2008. Furthermore, according to Le Nguyen (2012) in addition to joining international conventions, ASEAN member states have signed a significant number of bilateral MLA treaties with both regional and extra-regional states. The state has shown potential in providing MLA for the battle against transnational crime, but joining international conventions and MLA treaties is only the first step. The international community wants this provision to be implemented effectively in daily life (Le Nguyen, 2012).

The ASEAN Treaty on MLA on Criminal Matters, one of the key regional agreements, refers to the majority of the goals of mutual assistance in the prevention, investigation, and prosecution of money laundering offenses, as outlined in Article 1 (2) of AMLAT.

The following are examples of mutual assistance that may be provided in conformity with this Treaty: gathering information or gaining voluntary comments from individuals; making plans for people to testify or offer assistance in criminal cases; making judicial documents serveable; conducting seizures and searches; examining things and places; giving original or certified copies of all pertinent records, documents, and pieces of evidence; locating or tracking instruments of crime and property acquired through the commission of an offense; the prohibition on the exchange of goods or the freezing of goods obtained through the conduct of an offense that may be recovered, forfeited, or seized; property that was obtained via the conduct of an

offense that is recovered, forfeited, or confiscated; and tracking down and identifying potential witnesses and suspects.

Other challenges include the lack of or inadequate asset confiscation laws in some countries, such as Cambodia, Laos, and Vietnam, which prohibit the implementation of preventive measures and requests for international seizure. The lack of consistency in domestic asset confiscation laws is a typical justification for this kind of assistance when a state requests help locating, tracking, freezing, or seizing assets as a preventive measure or when a state requests assistance in seizing criminal proceeds from foreign states. The MLA regime will undoubtedly be hampered by insufficient cooperation in enforcing preventive measures and confiscating the proceeds and instrumentalities of crime. In particular, a lack of good tracing cooperation may make it difficult to find the sources and primary offenses of the illicit proceeds. Lack of reciprocal support in freezing, seizing, and confiscating illegal funds may make it easier for money transfers and other types of fund manipulation (Le Nguyen, 2012; Yuwono et al., 2021).

Further, Indonesia, according to Atmasasmita (2010) has signed the treaty on mutual assistance in criminal matters with Australia, China, South Korea, and seven member countries of ASEAN, including Singapore. However, these treaties are considered to have not been effective in their implementation. It means that, in some cases, mutual assistance within ASEAN and other countries would be effective if there were diplomatic, informal, and institutional approaches between the states. Because some countries would decline the *fishing expedition* on the asset recovery, Indonesia should have a bargaining position between ASEAN member states. Regarding the alternative solution for this case, asset recovery within ASEAN, Indonesia has goodwill and political will to empower and support this agenda because this problem must conform to the legal systems, some legislations, as well as cooperation, relation, and agreement.

CONCLUSION

There is no satisfactory answer to this case. Even the conditions will depend on the asset recovery within ASEAN since it has to refer to the same procedure, terminology, and interest to combat corruption and execute asset recovery. Although ASEAN has AMLAT as the law instrument on asset recovery, it is not effectively implemented due to some factors: (1) some principles applied by some countries, (2) lack of court order and fishing expedition, (3) problems of ratifying the treaties on non-retroactive principle, (4) the absence of special institution focusing on asset recovery in Indonesia or ASEAN, (5) goodwill and political will of the government in this case. This study highlights that some efforts can be made to this asset recovery, including how the law should be reformed. These efforts involve (1) synchronizing the rules with the international standard, (2) initiating the special institution that focuses on asset recovery, (3) empowering good diplomatic and informal relations, especially in the transboundary activities in the digital age (4) emphasizing the asset recovery to

establish common terminology and procedures, and (5) developing the capacities of law enforcement officials.

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