



Analysis of Abuse of Authority by Customary Village Officials in the Case of Illegal Levies that Occurred in Berawa Traditional Village as a Form of Corruption in the Indigenous Community

Kadek Asprila Adi Surya ^{1*}, Anak Agung Angga Primantari ²

¹⁻² Faculty of Law, Udayana University, Indonesia

* Corresponding Author: **Kadek Asprila Adi Surya**

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Abstract

One of the most common forms of corruption in society is illegal levies (pungli). The current phenomenon of illegal levies does not only occur in the formal government bureaucratic environment, but also begins to penetrate into the structure of indigenous communities that have high social and religious power. Customary villages, as customary law entities recognized by the state, often have devices that carry out government functions based on local traditions and culture. The author uses normative legal research with a legislative approach. The results of this study show that the Customary Village Act of collecting a sum of money from business actors in the name of "punia funds", without a valid legal basis, can meet the elements of abuse of authority as known in the criminal act of office. The deviation of authority by the Customary Village is a manifestation of the failure of the application of rational-legal bureaucracy, where the authority given to regulate and serve the community is used arbitrarily for personal interests. In this case, the Customary Village is considered as a state administrator because it has the power to run the customary government, which according to the Supreme Court and the Corruption Law has been expanded to include everyone who carries out public functions and receives funds or facilities from the state or society. The legal construction in the verdict on illegal levy corruption by the Customary Village also emphasizes the importance of integration between national law and customary law. In practice, customary law has locally binding powers, but when used to justify actions against national law, the superiority of positive law still applies.

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Introduction

Corruption is a form of *extraordinary crime* that can damage the joints of the life of the nation and state. Corruption not only has an impact on the state's financial losses, but also causes public distrust of the government and public institutions. This crime creates social inequality, widens the poverty gap, and hinders just and sustainable development. Therefore, efforts to eradicate corruption are a shared responsibility between the state, society, and all existing legal elements ^[1]. One of the most common forms of corruption in society is illegal levies (pungli). Pungli can be understood as a request for money or goods by officials who do not have a valid legal basis and are carried out by using power or position.

¹ Corruption Eradication Commission, KPK Annual Report, Jakarta: KPK, 2023, p. 5.

Although the number is sometimes small, if done systematically and repeatedly, this practice can have a very detrimental impact on society and even create a permissive culture of corruption^[2].

Illegal levies are usually carried out in an unequal relationship, where the collector has authority or influence over the citizens. This makes it difficult for people to refuse because of fear, social pressure, or ignorance of their rights. Pungli often occurs in public services, licensing, and in the context of customary law which is still strong in various regions^[3]. The current phenomenon of pungli does not only occur in the formal government bureaucratic environment, but also begins to penetrate into the structure of indigenous communities that have high social and religious power. Customary villages, as customary law entities recognized by the state, often have devices that carry out government functions based on local traditions and culture. However, in some cases, these customary authorities actually open a gap for abuse of authority that leads to the practice of illegal levies^[4].

One of the interesting cases that needs attention is the one that occurred in Berawa Traditional Village, Badung Regency, Bali. In this village, there are strong indications that some customary village officials are levying against indigenous peoples without a clear written legal basis. The levy is packaged in the form of "customary contributions" or "voluntary funds", but its implementation is often accompanied by the threat of social or customary sanctions for those who refuse, making it difficult to distinguish from the practice of pungli. People living in customary village areas such as Berawa generally have high compliance with customary rules and traditional leaders. This compliance, although it reflects the preservation of cultural values, in practice can hinder the courage of citizens to question harmful customary policies. Citizens often do not understand that their rights are protected by national law, and that a legally valid levy is a criminally prosecutable offense.

The absence of strict supervision of the power of traditional village officials creates a gray area in village financial governance. There is no adequate transparency regarding the management of the funds collected through the levy, and there is no accountability mechanism that allows the public to access information openly. As a result, the potential for corruption crimes, especially in the form of pungli, has become higher^[5]. The problem becomes even more complex when law enforcement agencies have difficulty in following up on community reports related to pungli by customary village officials. Often, these actions are considered internal affairs of indigenous communities, so they are reluctant to be touched by state officials. In fact, if the act causes economic losses, psychological pressure, and is contrary to national law, it should be processed through criminal law mechanisms^[6]. The recognition of the existence of customary villages in Article 18B paragraph (2) of the 1945 Constitution does not mean giving legal immunity to customary village officials for unlawful acts. On the contrary, the recognition must be accompanied by the regulation of the boundaries of authority and supervision mechanisms so that there is no abuse of

power. This is critical to maintaining a balance between the preservation of local values and the enforcement of national laws. On the other hand, there are concerns that the application of criminal law against indigenous leaders will damage the social structure and public trust in customary institutions. However, a culturally responsive approach should not negate the principles of justice and legal certainty. The state must be able to formulate a legal approach that is not repressive, but still effective in protecting the public from corrupt practices. The form of pungli disguised as "customary contribution" or "voluntary funds" needs to be studied juridically to determine whether the elements of corruption have been met. If the customary village officials use their authority to force the community to pay dues without a legal basis, and the funds are not managed transparently, then the elements of abuse of authority and community losses are very likely to be met.

Berawa Traditional Village also has a distinctive social dynamic because it is located in a rapidly growing tourism area. Modernization, increasing land value, and high intensity of economic activities have made this village experience pressure and changes in the social structure. In such a situation, customary village officials have a great influence on the distribution of resources and access to economic opportunities, so the potential for abuse of power is even higher.

Reporting of pungli practices by the community also faces great challenges. In addition to the lack of legal understanding, there is a fear of social sanctions and stigma from fellow citizens. Many people prefer to be silent and pay rather than risk their social position in the community. Therefore, the system of protection against whistleblowers (*whistleblower*) is very important in the context of indigenous peoples. In handling pungli cases carried out by customary village officials, an integrative approach between customary law and national criminal law is crucial. The state should not simply impose its laws without taking into account the socio-cultural structures that live in indigenous peoples. On the other hand, customary law should also not be used as a shield to protect unlawful acts.

It is necessary to formulate a legal policy model that can harmonize the rule of law and local wisdom. This model should include culturally sensitive monitoring, reporting, and enforcement mechanisms, while still ensuring the protection of citizens' rights. The handling of pungli practices by customary village officials such as in Berawa must be used as a momentum to strengthen synergy between customary institutions and state legal institutions in creating fair, transparent, and accountable governance of indigenous peoples.

Problem Formulation

1. What is the form of abuse of authority carried out by the Berawa Traditional Village officials in the practice of illegal levies against indigenous peoples?
2. What is the legal construction of corruption in the form of illegal levies carried out by Berawa Traditional Village officials as described in Decision Number

² Sutan Remy Sjahdeini, *Corruption Criminal Law in Indonesia*, Jakarta: Rajawali Press, 2020, p. 67.

³ Barda Nawawi Arief, *Bunga Potpourri Criminal Law Policy*, Jakarta: Prenadamedia, 2015, p. 123.

⁴ I Nyoman Nurjaya, "Customary Law in the National Legal System," *Ius Quia Iustum Law Journal*, Vol. 24 No. 2 (2017): 211–230.

⁵ Made Suyasa, "Transparency of Customary Village Funds in Bali," *Journal of Public Administration*, Vol. 18 No. 2 (2022): 91–102.

⁶ I Gede Ardana, "Law Enforcement Constraints in Indigenous Communities," *Udayana Law Journal*, Vol. 11 No. 3 (2022): 305–320.

15/Pid.Sus-TPK/2024/PN Dps?

Purpose

The purpose of the article is to find out and analyze the forms of abuse of authority carried out by the Berawa Traditional Village officials, especially in the context of the practice of illegal levies (pungli) against indigenous peoples. This objective focuses on identifying actions that deviate from official authority, as well as how such abuses occur in practice in the field and examining the legal construction of corruption crimes in the form of illegal levies as decided in Decision Number 15/Pid.Sus-TPK/2024/PN Dps, with the aim of understanding how law enforcement officials assess, prove, and formulate criminal elements in the case based on the applicable positive legal provisions.

Discussion

A. Forms of Abuse of Authority Committed by Berawa Traditional Village Officials in the Practice of Illegal Levy against Indigenous Peoples

The abuse of authority carried out by the Berawa Customary Village officials, especially by I Ketut Riana as the Traditional Bandesa, reflects a serious abuse of power in the customary government system in Bali. In its capacity as the highest leader of customary villages, Bandesa should carry out its functions in accordance with the principles of customary law and national law. Based on Article 18B paragraph (2) of the 1945 Constitution of the Republic of Indonesia, the state recognizes and respects the unity of customary law communities and their traditional rights as long as they are alive and in accordance with the development of society and the principles of the Unitary State of the Republic of Indonesia. This provision is strengthened in Article 1 number 10 and Article 4 paragraph (1) of the Bali Provincial Regulation No. 4 of 2019 concerning Customary Villages in Bali, which affirms that customary villages are legal subjects who play a role in carrying out customary-based government functions, including financial and asset management collectively and accountably^[7].

As part of the state administration system based on regional autonomy and recognition of customary law, every action of customary village official must be subject to the principles of state administrative law and national criminal law. Abuse of authority carried out without a basis for customary law or formal provisions, such as in the case of a request "dana punia" against PT. Berawa Bali Utama, which does not go through the village or legal perarem, is a form of violation of the law. This practice violates the principles of legality and justice in government, and fulfills the elements of unlawful acts as stipulated in Article 12 letter e of Law No. 31 of 1999 jo. Law No. 20 of 2001 concerning the Eradication of Corruption, which states that public officials who force someone to give something by abusing power, can be sentenced to death for extortion in office^[8].

Customary villages, while having autonomy in governing their own households, remain part of a broader system of government. Therefore, the actions of customary bandesas who abuse their positions for personal gain not only violate customary norms, but also are contrary to national law and

the principles of the state of law. In this context, I Ketut Riana's act is an unlawful act, both materially (because it harms the community and business actors), and formally (because it is not in accordance with applicable legal procedures). Therefore, it is important to strengthen the monitoring mechanism for customary villages through institutions such as the Customary Village Council (MDA) and other supervisory agencies so that the principles of transparency, accountability, and participation are maintained in the implementation of customary governance. The act of the Traditional Bandesa collecting a sum of money from business actors on behalf of "dana punia", without a valid legal basis, can meet the elements of abuse of authority as known in the criminal act of office. According to the theory of abuse of office, the main elements that must be met include the existence of authority inherent in the perpetrator, the use of this authority beyond the limits, and consequences that cause harm to others or society. In this case, the Customary Bandesa has a formal position based on the Bali Provincial Regulation Number 4 of 2019 concerning Customary Villages in Bali, which recognizes its authority in running customary government. However, when the authority is used to levy without valid customary procedures (for example, without a customary paruman decree or the basis of the law), then legally the action has deviated and has the potential to fulfill the elements of office offense in Article 421 of the Criminal Code, namely abuse of power by officials.

The actions of the Customary Village can be subject to administrative sanctions in accordance with the provisions of Article 24 and Article 26 of the Bali Provincial Regional Regulation Number 4 of 2019. Article 24 stipulates that: "Any violation of the awig-awig and/or perarem of the Customary Village may be sanctioned by the Customary Village in accordance with the provisions of the applicable customary law." While Article 26 paragraph (1) states that: "Customary Villages that deviate from the principles of the implementation of customary government as referred to in this regulation may be subject to administrative sanctions by the Regional Government." The administrative sanctions referred to in paragraph (2) include written warnings, termination of financial assistance, to freezing the recognition and dismissal of the management of the Customary Village. This provision shows that even though the Customary Village is culturally autonomous, there is still a mechanism of supervision and sanctions from the local government to ensure orderly administration and protection of community rights from the potential arbitrariness of the customary apparatus^[9].

Sociologically, the actions of the Customary Villages that abuse their authority in their customary capacity can result in a decrease in the legitimacy of customary institutions in the eyes of the community. The Traditional Bandesa is not only an administrative leader, but also a moral and spiritual symbol of the Balinese people. In local philosophy like Tri Hita Karana and Tat Twam Asi, traditional leaders are expected to be able to carry out their duties wisely, fairly, and transparently. When traditional leaders act repressively or force financial contributions without deliberation or agreed

⁷ Article 18B paragraph (2) of the Constitution of the Republic of Indonesia in 1945; and Article 1 number 10 and Article 4 paragraph (1) of the Bali Provincial Regional Regulation Number 4 of 2019 concerning Customary Villages in Bali.

⁸ Article 12 letter e of Law Number 31 of 1999 concerning the Eradication of Corruption as amended by Law Number 20 of 2001.

⁹ Bali Provincial Regulation Number 4 of 2019 concerning Customary Villages in Bali

customary basis, the community's trust will be eroded. As a result, there is social disorientation that has the potential to give rise to horizontal conflicts between residents and customary officials, as happened in the case of the internal dispute of the Pecatu Traditional Village in 2020, where the community sued for transparency in the management of customary village funds by traditional stakeholders^[10].

Therefore, it is necessary to strengthen the integration system between national law and customary law through an approach that respects each other while still upholding the principle of the rule of law. Customary law must be subject to universal principles such as due process of law, non-discrimination, and accountability. In this case, the actions of the Customary Villages that do not have legitimacy through legal customary mechanisms or are contrary to the provisions of national laws and regulations, should be subject to legal liability, both criminal and administrative. Law enforcement can be carried out by formal law enforcement officials, while still opening the resolution space through the mechanism restorative justice, as long as it does not eliminate the rights of the victim or the aggrieved party. Restorative justice In this context, it must be based on local values, but it must also be within the framework of formal legal protection so as not to become a form of disguised impunity for the abuse of power by indigenous leaders^[11].

The phenomenon of abuse of authority that occurred in the case of Bandesa Adat I Ketut Riana can be analyzed conceptually through Robert Klitgaard's Theory of Corruption, which formulates corruption as the result of the interaction between power monopolies, broad discretion, and low levels of accountability (*corruption = monopoly + discretion – accountability*). The authority inherent in the Customary Village as the highest authority in the management of the customary government creates a monopoly situation that allows important decisions to be taken without adequate control mechanisms. Discretion owned without strict supervision has the potential to be used for personal interests, such as in the case of collecting punia funds without the consent of the village paruman or a legal basis for the law. The imbalance between monopoly and discretion that is not balanced with transparent and participatory accountability makes these abusive practices vulnerable and has negative implications for public trust in customary institutions.

The approach put forward by Ramirez Torres provides an additional dimension by placing corruption as a systemic and cultural phenomenon, not just an individual action. Corruption in this context is the result of the interaction of unequal social structures, political cultures, and power patterns in an institution. In customary village institutions, the norms and values that should govern governance based on the principles of deliberation and kinship have been degraded, so that the actions of the Customary Village Authorities who levy without legal procedures are an indication of weak internal governance and social tolerance for deviations. This approach emphasizes the importance of structural reforms and organizational culture change so that the values of transparency, justice, and accountability can be truly upheld, while preventing practices that have the potential to become a culture of corruption hidden in the

indigenous environment.

Abuse of Authority Theory (*Abuse of Authority*) developed by Max Weber emphasizes the importance of exercising the authority of public officials based on rational-legal principles, where authority must be exercised in accordance with legitimate norms, procedures, and objectives. The deviation of authority by Bandesa Adat I Ketut Riana in this case is a manifestation of the failure of the application of rational-legal bureaucracy, where the authority given to regulate and serve the community is used arbitrarily for personal interests. Weber also emphasized the need for accountability and effective oversight as the main pillars in preventing and cracking down on abuse of power. Therefore, strengthening the control function by the Customary Village Assembly and local government officials is absolutely necessary so that the principles of transparency and accountability can run in accordance with the rules of law and customary values that live in the community. Uncontrolled acts of abuse of authority will cause distortions in the customary government system and weaken the social legitimacy that is the basis of the existence of the customary village itself.

B. Legal Construction of Corruption Crimes in the Form of Illegal Levies Carried Out by Berawa Traditional Village Officials as Described in Decision Number 15/Pid.Sus-TPK/2024/PN Dps

The Presidential Threshold which was implemented starting the legal construction of corruption in the form of illegal levies carried out by the officials of the Berawa Traditional Village, I Ketut Riana, was built on the basis of article 12 letter e of Law Number 31 of 1999 jo. Law Number 20 of 2001 concerning the Eradication of Corruption Crimes (Corruption Law). The article stipulates that a public servant or state administrator who abuses power to force someone to give something, pay, or do something, can be criminally charged. In this case, the Customary Village is considered as a state administrator because it has the power to run the customary government, which according to the Supreme Court and the Corruption Law has been expanded to include everyone who carries out public functions and receives funds or facilities from the state or society.

The main elements in article 12 letter e are the existence of an official position or position used to coerce another party, and the existence of personal or other personal benefits obtained from the act. In this case, I Ketut Riana took advantage of his position as a Traditional Bandesa to force the investor, PT Berawa Bali Utama, to give a sum of Rp10 billion, which was eventually received in stages of Rp150 million. This action meets the criteria of "abuse of authority" and "coercion by position", as also explained by Adami Chazawi who stated that Article 12 letter e is a derivative of Article 423 of the Criminal Code regarding extortion in office.

The Court stated that the element of "civil servant or state administrator" had been fulfilled, because the Customary Village carried out a government function that had authority over the community and village resources. This is also affirmed by Articles 2 and 3 of Law Number 28 of 1999 concerning Clean and Free State Administrators from KKN,

¹⁰ Mongabay Indonesia's investigative report (2020), "Clashes between Residents and Customary Customs in Pecatu: Scrambling for Transparency of Customary Village Funds," is accessed via www.mongabay.co.id.

¹¹ Barda Nawawi Arief, *Bunga Pourai Política Criminal Law* (Jakarta: Kencana, 2010), p. 75.

which states that state administrators include officials in state and regional institutions who use their authority to serve the public interest. Thus, customary village officials are included in the scope of state administrators if they hold positions that affect public policy or access to public resources. Furthermore, the legal construction built in the decision also includes "continuous" acts as stipulated in Article 64 paragraph (1) of the Criminal Code. The Panel of Judges stated that the defendant's actions were carried out repeatedly, at different times but had the same motive and purpose, namely forcing the victim to give money. This element is important because it aggravates the crime and shows systematic intentionality. This interpretation is in line with Andi Hamzah's opinion that extortion in office is a very serious form of office corruption because it occurs in the midst of power relations between the state and citizens.

Evidence that the levy is corruption and not a customary donation is the absence of financial reporting to the Customary Village and not going through the Village Paruman process as required by Article 41 of the Bali Provincial Regulation No. 4 of 2019. By not formally involving customary institutions and storing funds for personal interests, there is a violation of the principles of transparency, accountability, and participation that are characteristic of public financial governance. This confirms that the levy is illegal and corruptly motivated. The legal approach to illegal levies in this context also pays attention to the theory of structural corruption, in which perpetrators use social institutions (in this case customary institutions) to justify actions that are actually unlawful. In the journal Yustisia by Marwan Mas, it is explained that corruption can occur through the institutionalization of culture and informal power, making it difficult to distinguish between customary authorities and legal irregularities. Therefore, it is important for positive law to break through the walls of cultural legitimacy that perpetrators use^[12].

In terms of evidence, the Panel of Judges considered that the witness statement, evidence of transfer, and confession of the defendant were sufficient to prove the existence of an element of "coercion" and in its consideration of the element of "abuse of power" the panel of judges considered the following:

"Considering, that based on the provisions of Article 24 of the Bali Provincial Regional Regulation Number 4 of 2019 concerning Customary Villages in Bali which regulates one of the authorities of Customary Villages is to participate in the determination of decisions and implementation of development in the Customary Village Territory and Article 31 of Regional Regulation Number 4 of 2019 which regulates the authority of Customary Villages, including one of which is to carry out supervision and control of activities held in Wewidangan Desa Custom, shows that there is power possessed by the Defendant as the Berawa Traditional Bandesa who is also the Pucuk Prajuru (Administrator) of the Customary Village in supervising, controlling and participating in determining decisions in investment activities in the

area/area of the Berawa Traditional Village, as stated in the Bali Provincial Regional Regulation Number 4 of 2019 concerning Customary Villages in Bali".

So that customary flags are considered the same as public officials who have power in the customary village area/territory with duties as mentioned in the consideration of the panel of judges. In the context of Article 12 letter e, which is a material offense, the act has been completed (voltooid) when the victim gives money, even without physical violence, because psychological pressure or dominance of position is enough as a tool of coercion. This is in accordance with the view of Barda Nawawi Arief who states that coercion does not have to be in the form of threats or violence, but is sufficient with subordinate pressure of power^[13].

The legal construction in this ruling also emphasizes the importance of integration between national law and customary law. In practice, customary law has locally binding powers, but when used to justify actions against national law, the superiority of positive law still applies. This is also affirmed by Satjipto Rahardjo in his theory of progressive law, that the law should be on the side of substantive justice, not a formality manipulated for the benefit of the local elite^[14]. This decision also applies the provisions of Article 18 of the Corruption Law regarding additional penalties in the form of reimbursement of replacement money, although in the verdict, the money is returned directly to the victim. This emphasizes that even though there is no direct financial loss to the state, the act is still included in the crime of corruption because it uses office to take personal gain. This view is in line with previous Supreme Court rulings, such as Decision No. 91 K/Pid.Sus/2012, which states that corruption does not always require proof of state losses if the perpetrator is a state administrator who abuses power^[15].

Thus, the legal construction of illegal levies carried out by the Berawa Traditional Village officials refers to strict but contextual principles of criminal law. This ruling is an important example of how the court interprets the law positively to penetrate the layers of customary power that have been abused. He also pointed out that the eradication of corruption must touch all levels of power, including customary institutions, so that public integrity can be maintained on all fronts. In this context, the judiciary serves as a gatekeeper between legitimate authority and corrupt abuses of power. The legal construction in this decision shows the importance of integration between national law and customary law that must run in balance, while still upholding the positive rule of law as the basis for the enforcement of justice in Indonesia. This approach is relevant to the Corruption Theory according to Klitgaard which states that corruption occurs due to a combination of power (power), opportunity (opportunity), and personal gain (gain). In the case of the Berawa Customary Village officials, the abuse of authority by the Customary Village to collect funds without a legitimate customary mechanism is a manifestation

¹² Marwan Mas, "Structural Corruption in the Cultural Perspective of Local Law," *Journal of Justice*, Vol. 5 No. 1 (2021): 43–55.

¹³ Barda Nawawi Arief, *Bunga Potpourri Criminal Law Policy* (Jakarta: Kencana, 2014), p. 176.

¹⁴ Satjipto Rahardjo, *Progressive Law: The Law of Liberation* (Jakarta: Kompas, 2009), pp. 67–69.

¹⁵ Supreme Court Decision No. 91 K/Pid.Sus/2012.

of these three elements, where the power they have is used arbitrarily without adequate control, opening up opportunities for personal gain. The ruling also adopted the principle of Ramirez Torres' Corruption Theory which emphasizes the social and cultural dimensions of corruption, that corrupt behavior can be rooted in local value systems and norms that are not aligned with the principles of national law and social justice. Thus, law enforcement efforts that prioritize restitution such as reimbursement in lieu of money in this ruling show that acts of corruption not only have an impact on financial losses, but also damage social structures and public trust in customary institutions and government in general.

Law enforcement against illegal levy practices in the Berawa Traditional Village is a clear example of the application of the Theory of Abuse of Authority (Abuse of Authority) Max Weber, who underlined that formal authority should be exercised in accordance with rational-legal norms and should not be abused for personal or group gain. The Customary Bandesa has formal authority based on local regulations, but the use of this authority to collect funds without legitimate and transparent procedures is a form of abuse of office that is contrary to ideal bureaucratic principles. The ruling also affirms that the court functions as an effective control mechanism against abuse of power, keeping customary institutions from becoming hotbeds of covert corruption. Law enforcement that refers to the principles of accountability and transparency is essential to maintain the legitimacy of customary institutions and strengthen clean and integrity governance, in accordance with the demands of communities who want substantive justice at the local and national levels.

Closing

Conclusion & Suggestion

The form of abuse of authority carried out by the Berawa Traditional Village officials, in this case by Bandesa Adat I Ketut Riana, is clearly seen through the practice of illegal levies disguised under the pretext of "punia funds" to investors. In carrying out his position as the leader of the customary village, the defendant did not involve the Village Paruman as a decision-making forum as stipulated in the Bali Provincial Regulation Number 4 of 2019 concerning Customary Villages, and acted unilaterally by forcing the private sector to contribute funds without a basis for customary law or legitimate national law. These actions were carried out without transparency, were not recorded in village financial reports, and were not used for the benefit of indigenous peoples, but for personal gain. This makes this action a form of abuse of power and betrayal of the principles of customary governance that prioritize deliberation and common interests. The legal construction of corruption in the form of illegal levies in this case is built on the basis of Article 12 letter e jo Article 18 of Law Number 31 of 1999 jo Law Number 20 of 2001 concerning the Eradication of Corruption Crimes, with the affirmation that the Customary Bandesa has the status of a state organizer because it has public power and the authority to manage village resources. The defendant's actions met the elements of corruption because he had abused his position to force someone to give money, without a legal basis, and for personal interests. In Decision Number 15/Pid.Sus-TPK/2024/PN Dps, the court-imposed prison sentences and fines, and acknowledged the continued act (Article 64 of the Criminal Code), thus reinforcing that the levy is a systematic corruption of office

and damages the order of customary government which should be clean and transparent. So that there is a need to improve the internal supervision system of Customary Villages.

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