

THE IMPLEMENTATION OF TREATIES IN INDONESIA'S LEGAL SYSTEM : A CASE STUDY ON EXTRADITION

Wisnu Aryo Dewanto, Go Lisanawati

UBAYA, Raya Kalirungkut, Surabaya, East Java, Indonesia

UBAYA, Raya Kalirungkut, Surabaya, East Java, Indonesia

Corresponding Author: Go Lisanawati

Email: go_lisanawati@staff.ubaya.ac.id

Received : November 15, 2023

Revised : December 31, 2023

Accepted : January 2, 2024

ABSTRACT

This study examines the application of international treaties to Indonesian law, focusing on extradition. An in-depth analysis of Indonesia's adoption and implementation of extradition treaties within the framework of its domestic legal system is provided in this article. International law is complex and nuanced, and extradition is no exception. The paper explores Indonesian extradition legislation, including relevant constitutional provisions, laws, and accepted legal practices. It examines the procedural elements of extradition, the role of the judiciary, and the guiding principles. This paper utilized the normative juridical technique using legal materials in the form of extradition laws and regulations and pertinent information about the Indonesian legal system. It aims to increase understanding of how Indonesia maintains its territorial integrity while navigating the intricate web of international agreements.

Keywords

Extradition, Indonesia's Legal System, Treaties

A. Introduction

By regulating the interactions between sovereign states, treaties significantly impact how the international legal system is shaped.¹ Regarding extradition, the Government of Indonesia concludes bilateral international extradition treaties with neighbouring countries, particularly ASEAN member states, such as Thailand, Malaysia, Singapore, The Philippines and Vietnam. The purpose of bilateral international extradition treaties is to ensure that perpetrators of criminal acts in Indonesia cannot escape punishment.² However, some perpetrators of criminal offences cannot be extradited to Indonesia for various reasons. There are three severe impediments to effective extradition, including (1) the lack of extradition treaties between countries, (2) the rigidity of many existing extradition treaties for broader offences, and (3) excessive extradition procedures.³

In Indonesia, implementing international treaties into the national legal framework is essential to the Indonesian legal system. The legal proceedings of extradition in Indonesia are regulated by Law Number 1/1979 on extradition.⁴ Even though the content no longer adheres to the circumstances as they stand. The Indonesian Government has been depending on international treaties that other nations have ratified and anticipates that these nations will be able to uphold their end of the bargain.

The problem that will be discussed in this article is how the process and procedures of Extradition in Indonesia will be captured from the cases in practice. This article uses normative juridical legal research techniques. It is founded on primary legal documents, such as extradition-related international treaties and legislation. Legal academics' opinions serve as secondary legal materials used to explore the issues raised in this study. Both a conceptual and a statutory approach are used in this study. This article examines how international extradition treaties became part of Indonesia's legal system and evaluates the process and challenges of extradition requests.

¹ Malgoisa Fitzmaurice, 'Practical Working of the Law of Treaties' Article in Malcolm D. Evans, *International Law*, Fourth Edition (Oxford University Press: 2010) 166.

² Bajang Barokhatul Kholisoh and Suswoto, 'Extradition by The Indonesian National Police of Perpetrators of Corruption from Indonesia, Based on The Legal Provisions Of The International Criminal Police Organization (ICPO-INTERPOL)' 1 *Jurnal Kajian Hukum*, 5.

³ Ivan Anthony Shearer, *Extradition in International Law University of Manchester* (United Kingdom Oxford Press 1971) 2.

⁴ I Gde Eka Haryana, 'Examination of Extradition Applications in Criminal Law Enforcement Efforts in Indonesia' 6 *Journal of Positive School Psychology* 4543,4544.

B. Discussion

1. The Extradition Process

Extradition is the surrender of a person by a state to a requesting state for committing a crime outside the territory of the requesting state.⁵ In order to expedite the extradition of offenders and guarantee that justice is done, Indonesia, like many other countries, has ratified several extradition treaties, both bilateral and multilateral. The bilateral treaties on extradition are made with neighbouring countries in the ASEAN region, such as Thailand, and have been made since 1979.⁶ In relation to multilateral treaties, Indonesia has ratified the 2000 Palermo Convention, of which Article 16 regulates extradition.⁷

Extradition is a legally recognized surrender based on a mutual agreement between nations. International extradition agreements come in two varieties: multilateral international accords, which cover several countries, and bilateral extradition agreements, which only cover two. In the case of surrendering a person to another country, it must fulfil the principle of double criminality, where the act committed is prohibited in both countries.⁸

Negotiating and ratifying is the first step in implementing an extradition treaty. The negotiation process is the executive's authority, in this case, the President or his representative, as stipulated in Article 6 of Law Number 37/1999 on Foreign Relations. The authority of the President in the context of making international agreements is limited to negotiations only. Article 11 Paragraph 1 of the 1945 Constitution states, "The President, with the approval of the People's Representative Assembly, declares war, makes peace and treaties with other countries." In terms of the integration of international treaties into Indonesian national law, the role of the executive and legislative bodies is vital. The external authority is the executive authority, while the internal authority is the legislative authority. When the President makes or negotiates international agreements with other countries or international organizations, the President's authority is limited to negotiating. In the sense of binding himself to the agreement, the President's desire to go deeper must get approval from the People's Representative Assembly, which is referred to as DPR. The DPR will issue a ratification law that serves as DPR's approval to the President who wants to bind himself to an international agreement. The DPR's approval does not necessarily make the international agreement an integral part of Indonesian national law. The substance of the international agreement will first be transformed into a

⁵ Dessy Lina and Oktaviani Suendra, 'Juridical Review of Extradition Treaty Between Indonesia and the Republic of South Korea in Narcotics and Psychotropic Crimes' (2021) 605 no. Icbt 66-69.

⁶ Kadarudin et al., 'Mutual Benefit Principle as Bilateral Basis of Indonesia with Thailand and Taiwan' 1 International Journal of Global Community 36,37.

⁷ Melissa Crouch & Antje Missbach, 'Trials of People Smugglers in Indonesia' Policy Paper Center for Indonesian Law Islam and Society 4.

⁸ Oluka, N Lucas, A Franklins, and E Abraham, 'Examination of the Implementations and Challenges of International Extradition Laws in the Post-Cold War Era: The African Perspective' (2003) 2 447.

transformation law, which will be used as a source of law in national courts.⁹ It aligns with Koskenniemi's idea that "International law acts conscience for state authorities, then we use international law as a sounding board for domestic policy and law. We rely then on international law not as law per se but a moment of sober second thought instead. International law does not require the character of law to accomplish this.

Furthermore, it could still offer courts additional reasons why a given case should be decided one way or another".¹⁰ In relation to Koskenniemi's idea, Indonesia recognizes international law as binding the state. As an institution that approves the President's desire to bind himself to an international agreement, The DPR must pay attention to the obligations of the international agreement to be embodied in the formation of laws so that the substance does not contradict each other.

Indonesia is a country that adheres to dualism. It is contrary to the opinion of Mochtar Kusumaatmadja, who said that Indonesia is a country that uses the monism system.¹¹ Its opinion assumes that international treaties that the Indonesian Government has ratified can be applied directly in national courts. In reality, this is not the case, as international treaties only bind states and not individuals. Therefore, international treaties must be transformed into Indonesian national regulations. This transformation method is a consequence of the dualistic system adopted by the Indonesian legal system, where international law and national law are equal.¹² In order to be enforceable in national courts, international law will be transformed into law. Therefore, in dualist countries, national courts do not directly apply international law as a source of law in deciding a case but are used to interpret national law. Transformation laws aim to elaborate the obligations in ratified international treaties through the transformation process into national law, which is the absolute authority of the Parliament, as stipulated in Article 20 Paragraph 1 of the 1945 Constitution of the Republic of Indonesia, which states "The Parliament has the power to make laws."¹³

For example, regarding wording in international treaties, the legal subject refers to the "state," such as the 2000 Palermo Convention on Transnational Organized Crime. Article 5 of the Convention states, "Each State Party shall adopt such legislative and other measures as may be necessary to establish as criminal offences..." Indonesia signed this Convention on December 12, 2000, and ratified it on April 20, 2009. As a state party to this Convention, there are obligations imposed by this Convention on state parties as in Article 5 above. The DPR is vital in implementing international treaties into Indonesian national law. Firstly, suppose the DPR agrees with the President's action. In that case, the DPR will issue a ratification law to the

⁹ Wisnu Aryo Dewanto, *Perjanjian Internasional Self-Executing Dan Non-Self-Executing Di Pengadilan Nasional* (Fakultas Hukum Universitas Gadjah Mada, Yogyakarta, 2011) 188.

¹⁰ David Haljan, *Separating Powers: International Law Before National Court* (The Netherlands: Springer, T.M.C. Asser Press, 2013).

¹¹ Ni'matul Huda, 'Legal Status of Ratified International Treaty Under Indonesian Hierarchy of Law' (Hanoi Vietnam National University Press 2019) 11–20.

¹² Ari Wiryadinata, 'The Dynamics of Ratification Acts of International Treaty Under Indonesian Legal System' (2021) 2 Jurnal Hukum Dan Peradilan 10, 197 doi:10.25216/jhp.10.2.2021.197-218.

¹³ Wisnu Aryo Dewanto, *Op.Cit* 124-143.

Palermo Convention, namely the ratification law through Law Number 5/2009 on the Ratification of the United Nations Convention against Transnational Organized Crime. Secondly, Parliament must implement the obligations stipulated in this Convention, where Article 5 states that state parties must make legislative rules, in this case laws, to criminalize people who commit transnational organized crime. Furthermore, the DPR has enacted the Anti-Money Laundering Law, the Anti-Money Laundering Law and the Anti-Corruption Law through its authority under Article 20 Paragraph 1 of the 1945 Constitution.¹⁴

Concerning extradition, the Government of Indonesia is not only bound by bilateral and multilateral international treaties to the extent that the Government of Indonesia needs to submit interpretative declarations related to the article in question. The obligation to extradite is set out in Article 16 of the 2000 Palermo Convention. Article 16 of the Convention seeks to ensure that state parties can cooperate in the fight against transnational organized crime so that perpetrators or groups of perpetrators can be punished in the requested country or the requesting country.

2. Requests for Extradition

No matter a nation's level of sovereignty, it is against the law to provide criminals asylum inside its borders. A country must exercise control over people accused of committing specific crimes or turn them over to a country with the resources and willingness to hold a trial.¹⁵ An official request to the Indonesian Government is made to seek an individual's extradition from Indonesia. The identity of the person making the request, specifics of the alleged offence, and supporting documentation must all be included. Just two of the governmental bodies in Indonesia that are involved in extradition are the executive and the judiciary. The executive is one of the parties that negotiates international extradition accords and determines whether to grant extradition to the country making the request. The judiciary ensures that the extradition request complies with relevant legal requirements. The terms of international treaties about whether the asking country and the requesting country have an extradition treaty will guide judges. Judges will be led by the clauses in international treaties addressing whether the requesting country and the asking country have extradition treaties and if the extradition request follows existing laws.

Indonesia has an extradition treaty with Thailand. In the treaty's annexe, there is a list of extraditable crimes agreed upon by both countries, such as murder, robbery, bribery, corruption, arson, and many more.¹⁶

There are extraditable and non-extraditable offences in the extradition treaty between Indonesia and Australia. Article 2 Paragraph 1 of the Extradition Treaty states that both

¹⁴ Ibid 251.

¹⁵ Untalimile Crystal Nyathi Mokoena and Emma Charlene Lubaale, 'Extradition in the Absence of State Agreements: Provisions in International Treaties on Extradition' (2019) 67 *South African Crime Quarterly* 31-42 doi:10.17159/2413-3108/2019/v0n67a4927.

¹⁶ See <thailawforum.com/database1/Treaty-of-Indonesia-4.html> accessed 5 January 2024.

countries can extradite 33 offences, such as willful murder, manslaughter, rape or sexual assault. Under the principle of double criminality, extraditable offences are offences that, according to the domestic laws of both countries, are prohibited acts and can be subject to legal sanctions. However, Article 2 Paragraph 2 provides leeway for the requested state to provide discretion for offences not regulated in Article 2 Paragraph 1.

In the case of Sayed Abbas, the Australian Government has requested the extradition of Sayed Abbas, who is accused of orchestrating the smuggling of undocumented immigrants from Afghanistan into Australia using two ships from Indonesia. Abbas is alleged to have organized and facilitated the unlawful entry of individuals without proper documentation. Following his apprehension by the Indonesian National Police, Australia submitted an official extradition plea. In Indonesia, the Attorney General's Office is tasked with representing the Government in court and evaluating the offence's nature, the crime's location (*locus delicti*), and the offender's nationality as per Indonesian law. The extradition decision depends on these factors, including the punishable nature of the offence, the crime's location, and the nationality of the accused individual.¹⁷

In the legal proceedings at the District Court, Judge Pranoto was based on Decision No. 01/PID.C/Ekst/2013/P.N.Jkt.Sel. rejected the extradition request for Sayed Abbas, ruling that he could not be extradited to Australia. The refusal was based on three grounds: firstly, the offence did not fall under the list of extraditable offences in the extradition treaty; secondly, the judge had doubts about Abbas's involvement in the alleged crime, as he was reportedly in the custody of the Serang District Court for an immigration case at the time; and thirdly, extradition requests were considered a matter of Australian foreign policy, beyond the court's jurisdiction.¹⁸

The South Jakarta District Court's rejection of the Australian Government's extradition request prompted the Prosecutor to appeal to the Higher Court. The appeal cited three reasons: first, the judge was seen as having made an error by not examining the sufficiency of the evidence or whether the suspect had committed an offence, considering the extradition respondent's status as a suspect. Second, regarding *locus delicti*, Indonesia's ratification of the 2000 Palermo Convention obligated criminalization and cooperation in law enforcement for transnational crimes. Third, the absence of a specific crime in the list of extraditable offences did not preclude extradition. The Higher Court accepted the appeal, overturned the South Jakarta District Court's decision, and conducted the trial, ultimately determining that Sayed Abbas could be extradited to Australia.¹⁹

¹⁷ M K Auladi, 'Penanganan Kasus Human Trafficking Sayed Abbas Yang Melibatkan Pemerintah Indonesia Dan Pemerintah Australia' *Gema Wiralodra* 12, no. Query date: 2023-03-27 11:41:23 (2021): 392-402, <http://gemawiralodra.unwir.ac.id/index.php/gemawiralodra/article/view/203>.

¹⁸ Ibid.

¹⁹ M K Auladi, "Penanganan Kasus Human Trafficking Sayed Abbas Yang Melibatkan Pemerintah Indonesia Dan Pemerintah Australia," *Gema Wiralodra* 12, no. Query date: 2023-03-27 11:41:23 (2021): 392-402, <http://gemawiralodra.unwir.ac.id/index.php/gemawiralodra/article/view/203>.

According to Article 33 of Law Number 1/1979 on Extradition, the judiciary determines whether or not the person should be extradited. The court only ensures and guarantees that the extradition request does not violate the principles of law and human rights. Based on Article 36 Paragraph 2 of Law Number 1/1979, It is then up to the President to decide whether the person can be extradited or not after studying the determination of the court and the considerations of the Minister of Justice, Minister of Foreign Affairs, Attorney General and Chief of Police. If the President agrees to extradite him, the President will decree to grant the extradition request.²⁰

3. Considerations and Obstacles to Extradition

Legal, political, and other concerns must be considered when implementing international extradition treaties. Human rights violations by the requesting nation, like torture or the death penalty, are frequently brought up in extradition cases. Like other nations, Indonesia must consider international human rights accords when assessing requests for extradition.

a. Considering Human Rights Issues

Indonesia has committed itself to international human rights treaties. Eight international human rights treaties have been ratified by the Government of Indonesia, including International Covenant on Civil and Political Rights (ICCPR), International Covenant on Economic, Social and Cultural Rights (ICESCR), Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), Convention on the Rights of the Child (CRC), Convention Against Torture (CAT), International Convention on the Elimination of All Forms of Racial Discrimination (ICERD), Migrant Worker Convention and International Covenant on Civil and Political Rights of Persons with Disabilities (ICPPED). The Indonesian Government has ratified these treaties to preserve and defend human rights inside its borders. The duties outlined in these international treaties have been incorporated into many Indonesian legislation and regulations, such as Article 28 of the 1945 Constitution and transformation laws that the Parliament has issued, for example, Law Number 39/1999 on Human Rights.

In extradition, the principle of non-refoulement is fundamental in that it prevents a state from extraditing a person who faces the risk of torture, inhuman treatment or the death penalty in the country requesting extradition.²¹ This principle is under the obligation in Article 3 of CAT, which states, "No Party shall expel, return ("refouler") or extradite a person to another State where there are substantial grounds for believing that he would be in danger of being subjected to torture."

²⁰ Keputusan Presiden Nomor 16 Tahun 2009 Tentang Mengabulkan Permohonan Ekstradisi yang Diajukan Pemerintah Perancis A/n Christian Burger 12:41 Pm 2/9/2010 (**Translation:** Presidential Decree Nr 16 of 2009 concerning Granted the extradition request submitted by the French Government on behalf of Christian Burger 12:41 pm 2/9/2010)

²¹ M. Alvi Syahrin, 'The Implementation of Non-Refoulement Principle to the Asylum Seekers and Refugees in Indonesia' (2017) *Sriwijaya Law Review* 1 168-78, doi:10.28946/slrev.Vol1.Iss2.41.pp168-178.

However, according to Apsari Dewi, the 1979 Extradition Law typically lacks adequate human rights protections for individuals implicated in extradition cases. It does not address fair trial standards, which are not obligatory for extradition requests. Additionally, those sought for extradition may face the risk of torture cruel, inhumane, and degrading treatment in the requesting state.²²

Due process is also considered, whether in the requesting country, the individual will be prosecuted relatively and transparently and receive an effective defence, and the individual's rights will be adequately fulfilled during the trial process.

A notable case related to extradition in Indonesia involves Hernoko Dewantoro, also known as Oki.²³ He was involved in a series of murders in Los Angeles, California, USA, in 1991 and 1992. He killed an Indian businessman, Suresh Gobid Mrichandini, in January 1991 and later murdered an Indonesian student, Gina Sutan Anwar, and his brother, Eri Triharto Dharmawan, in the spring of 1992. Oki confessed to the killings and fled to Jakarta, Indonesia. The United States sought Oki's extradition, as the crimes occurred on U.S. soil and carried the death penalty under U.S. law. However, as there was no extradition treaty between Indonesia and the United States, the Indonesian Government refused the extradition request and opted to try Oki in its national courts.²⁴ Ultimately, Oki was sentenced to death in Indonesia in 1997 for the murders.²⁵ If reviewed from the theory of state jurisdiction, the Indonesian Government's reluctance to extradite Oki was not only due to the threat of the death penalty in the United States but also to the active national principle adopted by the Indonesian Government, where the state can apply national jurisdiction to Indonesian citizens who commit criminal acts in the territory of another country.²⁶

Regarding human rights issues, the Indonesian Government should consider not only nationality but also other factors, particularly the possibility of inhuman treatment from the requesting country against someone who is not an Indonesian sought for extradition.

b. Obstacles posed by Diplomatic and Political Pressure

Extradition requests can be sensitive in international relations, especially when the requesting state is a large country with extensive international influence. Although states are legally equal, politically, there are castes. In the U.N. Security Council, there is a clear distinction between permanent and non-permanent members. The ability of the five

²² Apsari Dewi, *Rethinking Indonesian Extradition Law, in Crime and Punishment in Indonesia* (Tim Lindsey and Helen Pausacker ed, Press, 2021 Routledge)166.ISBN: 978-0-429-45524-7.

²³ Henry Yoseph Kindangen, "Implementation of Death Penalty Crime: Dilemma Between the Nationality Principle and Human Rights", *Fiat Justitia*, Vol. 16, No. 3, pp. 198-199.

²⁴ Dio Poliando Panggabean et al., 'Legal Analysis of Obstacles in Applying the Extradition by Law Enforcers in Extraditing Perpetrator of Corruption Criminal Crime' (Proceedings of the Second International Conference on Public Policy, Social Computing and Development (ICOPOSDEV 2021)) 642, no. Icoposdev 2021 (2022) 15–21, doi:10.2991/assehr.k.220204.003.

²⁵ M. Rizal Maslan, 'Misteri Nasib Oki Setelah Dua Kali Grasi' n.d., <<https://news.detik.com/x/detail/crimestory/20220311/Misteri-Nasib-Oki-Setelah-Dua-Kali-Grasi/>>.

²⁶Dewa Krisna Prasada et al., "Human Trafficking, Kejahatan Transnasional Dalam Prespektif Prinsip Nasional Aktif Di Indonesia," *Fundamental: Jurnal Ilmiah Hukum* 12, no. 1 (2023): 244–60, doi:10.34304/jf.v12i1.107.

permanent members of the Security Council to veto U.N. Security Council resolutions creates injustice for other countries. It is unfair because it hinders fair and effective decision-making. In addition, the existence of the veto demonstrates the inequality of state power and hinders the U.N. from taking the necessary action to address crises or armed conflicts. Furthermore, the use of the veto is not in the common interest of the U.N. or the international community but in their national interest.²⁷

Inequality in international politics is heavily influenced by economic and military power, membership in specific alliances such as the North Atlantic Treaty Organisation (NATO), European Union (E.U.), Australia, United Kingdom and United States (AUKUS) Agreement and others, the ability and success of diplomacy and natural resources.²⁸

Indonesia has experienced solid political pressure from the United States and Singapore in the case of Lim Yong Nam alias Steven Lim.²⁹ The United States Government has accused Steven Lim of sending illegal materials to Iran for the development of a nuclear program. The U.S. extradition request was initially made to the Singapore government, but the Singapore courts rejected it.³⁰ The Indonesian authority arrested Steven Lim at the request of the United States Government when he visited Batam. In the court order Number 01/Pid.Ekst/2015/P.N.BTM, dated April 20, 2015, stipulated that the extradition request met the applicable legal requirements, namely the principle of double criminality.³¹ Indonesia and the United States As of now, Indonesia and the United States do not have an extradition agreement.

In this case, although the principle of double criminality is met, the court can reject the extradition request of the United States Government through Article 8 of the Indonesian Extradition Law. This case shows the complexity and politicization of extradition where Lim Yong Nam has been denied the extradition request of the United States by the Singapore Court but granted by the Indonesian Government. The granting of the U.S. extradition request was not solely based on the legal principles of extradition but political and diplomatic pressures.

²⁷ Elena Temelkovska-Anevska & Elizabeta Tosheva, 'The United Nations Security Council: The Abuse of Its Veto Power and Its Necessity for Reform, Conference Proceedings' (Faculty of Law University St. Kliment Ohridski, Bitola, Republic of North Macedonia) 76.

²⁸ M. Najeri Al Syahrin, *Keamanan Asia Timur: Realitas, Kompleksitas dan Rivalitas*, Komojoyo Pers, 2018, pp. 89-101.

²⁹ 'Singaporean man sentenced to 40 Months in Prison For Plot Involving Export to Iran of U.S Components' (April 27, 2017) <<https://www.justice.gov/opa/pr/singapore-man-sentenced-40-months-prison-plot-involving-exports-iran-us-components>>.

³⁰ 'Singaporean Wanted by U.S detained in Batam' (October 24, 2014) <<https://www.straitstimes.com/asia/se-asia/singaporean-wanted-by-us-detained-in-batam>>.

³¹ 'Penipu Dan Penjahat Lintas Negara Berdarah Cina Berkeliaran Di Indonesia, Kejaksaan Agung Lakukan Ekstradisi Lim Yong Nam Ke Negeri Paman Sam' (Mach 31, 2016) <

C. Conclusion

In conclusion, the article delves into the intricate landscape of international extradition treaties and their implementation in the Indonesian legal system. Bilateral and multilateral agreements, particularly with ASEAN member states, play a crucial role in regulating the surrender of individuals accused of committing crimes outside Indonesia's borders. However, challenges such as the absence of extradition treaties, rigid treaty provisions, and cumbersome extradition procedures hinder effective cooperation.

The legal framework for extradition in Indonesia relies on Law No. 1/1979 on extradition, though there is a growing dependency on international treaties that other nations have ratified. The dualistic nature of Indonesia's legal system necessitates the transformation of international law into national law for enforceability in domestic courts.

The extradition process involves negotiation, ratification, and a stringent evaluation of extradition requests by both the executive and the judiciary. The article explores a case study involving Sayed Abbas, illustrating the complexities faced in determining extradition eligibility, considering factors such as the type of offence, locus delicti, and potential political implications.

Considerations and obstacles to extradition extend beyond legal aspects, encompassing human rights concerns and diplomatic pressures. Adherence to international human rights treaties, including the principle of non-refoulement, is crucial in assessing extradition requests. Notable cases, such as that of Hernoko Dewantoro alias Oki, highlight the importance of evaluating extradition requests in light of human rights principles.

Diplomatic and political pressures, exemplified by the case of Lim Yong Nam alias Steven Lim, further complicate the extradition landscape. The article underscores how unequal power dynamics in international relations can impact extradition outcomes, emphasizing the need for a balanced approach that considers legal principles, human rights, and geopolitical realities.

In essence, the challenges and considerations outlined in the article reflect the intricate interplay between domestic and international factors in shaping Indonesia's extradition landscape. As the nation navigates these complexities, the evaluation and evolution of legal frameworks will remain paramount to ensure a fair and just extradition process.

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