



Legal Liability of Perpetrators of Criminal Offenses Involving the Misuse of the Transportation and Sale of Subsidized 3-Kg Liquefied Petroleum Gas (LPG)

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Abstract

One of the persistent problems in energy distribution in Indonesia is the misuse of the transportation and trading of 3 kg liquefied petroleum gas (LPG). This gives rise to subsidy distribution that fails to reach its intended recipients, causing harm to the community as a whole and to the state budget. A notable discrepancy continues to exist in judicial practice between the criminal penalties prescribed by law and the sentences actually handed down by judges, despite the fact that legal provisions have established significant criminal threats for such offences. This study aims to analyse the form of legal accountability applicable to those who abuse the transportation and trading of subsidised 3 kg LPG. The method employed is normative legal research, utilising a legislative approach and a conceptual approach. The results of the study show that the actions of perpetrators fulfil the elements of criminal offences as stipulated in the applicable laws and regulations, such that perpetrators may be held criminally accountable. However, in practice, judges tend to impose relatively lighter sentences than those threatened under the law, taking into account mitigating factors and the judge's assessment of the circumstances of each case.

INTRODUCTION

The misuse of transportation and trading of 3 (*three*) kilograms of LPG (*Liquefied Petroleum Gas*) is one of the problems that still often occur in the energy distribution process in Indonesia. Ensuring households and small businesses have access to energy is the main goal of the 3 kg LPG subsidy program. The distribution of subsidized LPG must be carried out correctly, under supervision, and in accordance with all applicable laws and regulations. However, in reality, this spread is often exploited through illegal trade and transit. For example, in order to attract many customers and at the same time make a profit, a 3-kilogram LPG gas cylinder is moved into a *portable* cylinder and sold at a lower price than the normal market price of *portable gas*. When the transportation and trading of subsidized 3 kg LPG is abused, the fair distribution of subsidized LPG is disrupted (Daipon et al., 2025). In order to collect more than the quota, many entrepreneurs at the basic level collude with distributors. Because the basic level that does not commit fraud has really decreased in supply, there is a scarcity of subsidized 3 kilograms of LPG. In addition, it can pose safety risks, such as explosions and gas leaks that endanger people's lives and property (Kuehl et al., 2021). On the other hand, although the law provides for very severe criminal penalties for those who take advantage of the transportation and sale of subsidized LPG, court practice shows that there are differences in sentencing (Ardiansyah et al., 2024; Kojima, 2021).

Anyone, anywhere, anytime, and with various tactics can be targeted by crime (Sanusi et al., 2024). For example, the Cirebon District Court tried the case of abuse of transportation

and sale of subsidized LPG 3 kg in Decision Number 51/Pid.Sus/2025/PN Cbn. In this case, it was determined that the defendants I. DEDI HIDAYAT ALIAS ADE Bin (Alm) SUTAN MANSUR and II. SOKMAN Bin (Alm) MOH. SUDRAJAT uses assembled equipment to transfer the contents of 3 kg subsidized LPG cylinders to non-subsidized portable gas cylinders for commercial purposes, then resell the gas at a price lower than the market price of non-subsidized gas. In order to gain financial benefits from the price difference between subsidized and non-subsidized LPG, these operations are often carried out without a valid trading business license (Muslikah & Rahman, 2026). The judge ruled that the defendants had violated Article 55 of Law of the Republic of Indonesia Number 22 of 2001 concerning Oil and Gas, as amended in Article 40 of Law of the Republic of Indonesia Number 6 of 2023 concerning Provisions of Government Regulation in Lieu of Law Number 2 of 2022 concerning Job Creation into Law Jo. Article 55 paragraph (1) 1 of the Criminal Code, (Maharani et al., 2025; Nasir et al., 2025) who were sentenced to 1 (one) year and 6 (six) months in prison and a fine of Rp 5,000,000.00 (five million rupiah), which is much lighter than the actual threat. This decision raises the question of whether the form of responsibility imposed can deter perpetrators and uphold justice.

The provisions of Article 55 of Law of the Republic of Indonesia Number 22 of 2001 concerning Oil and Gas as amended in Article 40 of Law of the Republic of Indonesia Number 6 of 2023 concerning the Stipulation of Government Regulations in Lieu of Law Number 2 of 2022 concerning Job Creation into a Law regulating the threat of imprisonment for a maximum of 6 (six) years and a maximum fine of Rp 60,000,000,000.00 (sixty billion). The significant difference between the normative threat and the reality of criminalization shows that there is a problem with criminal legal responsibility for the illegal transportation and trading of subsidized 3 kilograms of LPG. To assess the legal liability of the perpetrator in this case, especially from the perspective of legal justice, a comprehensive scientific study is needed.

What is the form of legal accountability for perpetrators of the crime of misusing the transportation and trade of subsidized 3 Kg LPG? The main purpose of this study is to analyze the form of legal accountability for those who abuse the transportation and trade of subsidized 3 kilograms LPG. This research is important because it provides a strong legal basis for the prosecution of those responsible for the increasing number of abuses involving the distribution of subsidized 3 kg LPG. This abuse sometimes jeopardizes justice and legal clarity for subsidy recipients. In addition, it is hoped that this research will contribute to knowledge about economic criminal law, especially regarding the effectiveness and forms of legal responsibility in similar situations. This is because the ineffective implementation of legislative criteria can result in losses to the state and violations of the rights of economically disadvantaged groups who depend on subsidized LPG for daily needs. As the current law enforcement system still faces a number of challenges, including inadequate oversight and insufficient punishment for those who commit related offences, appropriate legal solutions are needed to achieve the goal of legal protection for subsidized LPG users. This highlights the urgency of this research. To increase the effectiveness of preventive measures and punishments against the abuse of subsidized LPG, it is hoped that this study can provide a more ideal and useful model of legal accountability. The government, law enforcement, and the general public can use the study's conclusions as a way to improve the framework for monitoring and controlling subsidized LPG distribution in Indonesia. To ensure the desired effectiveness and support for the welfare of the

community, it is hoped that this study can improve legal science and provide strategic assistance to state administrators to optimize the distribution and protection of subsidized LPG.

This research is expected to provide both theoretical and practical benefits. Theoretically, this study is expected to advance legal scholarship, particularly in the field of criminal law concerning the legal responsibility of perpetrators involved in the misuse of subsidized 3 kg LPG transportation and trade. Furthermore, this research is expected to enhance the understanding of criminal responsibility, including the concept of criminal accountability, and to serve as a reference for future studies addressing similar issues. Practically, the findings of this study can assist law enforcement officers in their efforts to address and prosecute perpetrators of illegal subsidized LPG misuse, particularly in determining appropriate criminal sanctions designed to deter such behavior. For the government, this research can serve as valuable input for policy formulation and for strengthening the supervision of subsidized 3 kg LPG distribution, ensuring that the distribution is accurately targeted and free from abuse. For the broader community, this study is expected to raise public awareness regarding the negative impacts of subsidized LPG misuse and to encourage active participation in monitoring and reporting any violations in the field, thereby supporting the creation of a more just and equitable energy subsidy system in Indonesia.

METHOD

Types of Research

This research uses normative juridical research methods with a qualitative approach, (Soekanto, 1995). Because it uses library materials as the main material. This type is descriptive analytical, examining theories, concepts, legal principles, and laws and regulations related to the criminal law accountability of abusers *Liquefied Petroleum Gas (LPG)* 3 Kg is subsidized, then analyzed to obtain answers to the legal problems being researched.

Research Approach

The approach used is the Legal Approach (*Statute Approach*) and Conceptual Approaches (*Conceptual Approach*), namely:

- 1) The *Statute Approach*, which is to examine criminal provisions related to the legal issues being handled (Marzuki, 2016), in this approach, what is used is Article 55 of Law of the Republic of Indonesia Number 22 of 2001 concerning Oil and Gas, as amended in Article 40 of Law of the Republic of Indonesia Number 6 of 2023 concerning Provisions of Government Regulation in Lieu of Law Number 2 of 2022 concerning Job Creation becomes Law Jo. Article 55 paragraph (1) 1st of the Criminal Code.
- 2) *Conceptual Approach*, a conceptual approach that moves from the views and doctrines that develop in the legal sciences.

Source of Legal Materials

The legal materials used in this study are as follows:

1) Primary Legal Material

The primary legal material used in this study is Article 55 of Law of the Republic of Indonesia Number 22 of 2001 concerning Oil and Gas, as amended in Article 40 of Law of the Republic of Indonesia Number 6 of 2023 concerning Provisions of Government Regulation in Lieu of Law Number 2 of 2022 concerning Job Creation into Law Jo. Article 55 paragraph (1) 1 of the Criminal Code.

2) Secondary Legal Materials

Secondary legal materials are used to provide explanations for primary legal materials. The secondary legal materials are books, journals, and articles related to the abuse of subsidized fuel oil.

Legal Material Analysis

The analysis of legal materials in this study was carried out in a qualitative juridical manner. All legal materials that have been collected are then analyzed systematically by connecting laws and regulations, legal theories, doctrines, and court decisions that are the object of research. The results of the analysis are then used to obtain conclusions regarding the criminal liability of the perpetrators of the abuse of subsidized 3 Kg LPG based on the applicable legal provisions.

RESULTS AND DISCUSSION

Forms of Legal Accountability for Perpetrators of Criminal Acts of Misuse of Transportation and Trading of Subsidized 3 Kg LPG

Criminal liability is a legal mechanism to determine whether a person who has committed a criminal act can be held accountable for his actions (Lasmadi et al., 2020). In criminal law, not everyone who commits an act prohibited by law can automatically be sentenced. To be convicted, it must first be proven that there is an element of guilt inherent in the perpetrator (Huda et al., 2025). Thus, criminal liability is not only related to the act committed, but also to the mental condition of the perpetrator at the time of committing the act. This is in line with the principle of *geen straf zonder schuld* which means there is no crime without fault (Sriyanto, 2026).

The form of criminal liability applied in cases of misuse of the transportation and trade of subsidized 3 Kg LPG is individual *criminal liability*. Individual criminal liability is a form of accountability imposed on each perpetrator for his own acts and mistakes. In the Indonesian criminal law system, a person can only be convicted if he is proven to have committed a criminal act and has the ability to legally account for his actions (Soemartono & Novienco, 2025). In this case, the defendants are the subjects of individual law (*natuurlijke persoon*) who commit the act consciously and without coercion from other parties. Therefore, criminal liability is charged directly to each defendant based on his role and involvement in committing the crime of misusing the transportation and trade of subsidized 3 Kg LPG. The accountability is realized through the imposition of imprisonment for 1 year and 6 months and a fine of IDR 5,000,000.00 based on Decision Number 51/Pid.Sus/2025/PN Cbn.

In addition to criminal liability, the actions of the defendants can theoretically also give rise to civil liability if they result in losses for other parties. Civil liability is born from an unlawful act that causes losses and requires the perpetrator to provide compensation to the aggrieved party (Haspada, 2025). This provision is regulated in Article 1365 of the Civil Code which states that every unlawful act that causes harm to another person requires the perpetrator to compensate for the loss (Soemartono & Novienco, 2025). In this case, the misuse of subsidized 3 Kg LPG has the potential to cause losses to the state because the subsidies allocated through the State Budget are not used according to their designation. In addition, the public as subsidy recipients can also be disadvantaged due to the reduced availability of subsidized LPG in the market so that its distribution is not on target. However, in Decision

Number 51/Pid.Sus/2025/PN Cbn, no compensation lawsuit or civil lawsuit filed by the aggrieved party was found. Therefore, the panel of judges only applies criminal liability in the form of imprisonment and fines without imposing the obligation of civil compensation to the defendants.

In accordance with the following provisions in Article 55 of Law of the Republic of Indonesia Number 22 of 2001 concerning Oil and Gas as amended in Article 40 of Law of the Republic of Indonesia Number 6 of 2023 concerning the Stipulation of Government Regulations in Lieu of Law Number 2 of 2022 concerning Job Creation into this Law: "*Any person who abuses the transportation and/or trading of subsidized Fuel Oil, gas fuel, and/or Liquefied Petroleum Gas and/or its supply and distribution is given an assignment by the Government shall be sentenced to a maximum of 6 (six) years in prison and a maximum fine of Rp60,000,000,000.00 (sixty billion rupiah).*"

To determine whether the abuse of the transportation and trading of subsidized 3 kg LPG can be considered a criminal offense, it is necessary to analyze the elements in Article 55 of Law of the Republic of Indonesia Number 22 of 2001 concerning Oil and Gas as amended in Article 40 of Law of the Republic of Indonesia Number 6 of 2023 concerning the Stipulation of Government Regulations in Lieu of Law Number 2 of 2022 concerning Job Creation into Law Jo. Article 55 paragraph (1) 1 of the Criminal Code.

The element of "everyone"

In criminal law, the phrase "every person" means a "subject of law" who is criminally responsible (Alfarisi et al., 2021). In this context, this meaning refers to a person who can understand and take responsibility for his actions, is legally competent, is able to think soundly, and can understand and account for his actions because the identities of the defendants proven at trial are in accordance with what is stated in the indictment by the Public Prosecutor. All of the defendants were in good mental and physical health, and their evidence was very clear throughout the trial. The confessions of the defendants and the sworn testimony of the witnesses provided further evidence that the people presented at the trial were the real people (Commission, 2011). As a result, the defendants meet the requirements to be considered legally capable of being criminally responsible. Thus, it can be concluded that the legal requirement to cover "everyone" has been legally fulfilled under the law.

Elements "that abuse the Transportation and/or Trading of Fuel Oil, Fuel Gas, and/or Liquefied Petroleum Gas subsidized and/or the provision and distribution thereof are assigned by the Government"

In this situation, the factor "misuse of transportation and/or trade in gas fuels and/or Liquefied Petroleum Gas (LPG) subsidized" is an alternative element, meaning that both elements must be proven in order for all charges to be met. The purchase, sale, and distribution of oil, natural gas, and refined products is referred to as trade based on the provisions of Article 1 number 14 of Law Number 22 of 2001 concerning Oil and Gas. In the fact of the trial that in order to resell the gas, the defendants moved a subsidized 3-kilogram gas cylinder into the cylinder *Portable* non-subsidized. This was revealed during the trial. Using special equipment including special pipes and regulators, this operation is carried out without official permission. The defendants also made a huge profit because they could fill 7 (seven) or 8 (eight) gas cylinders *Portable* with 1 (one) subsidized 3-kilogram LPG cylinder and selling it illegally.

This practice shows the commercialization of subsidized goods that should be intended for certain communities.

Legal experts in the oil and gas industry say that these illegal activities can put people at risk if safety protocols are in place, carried out without proper operational standards. In addition, this act resulted in the distribution of subsidized LPG being not on target. The defendants' conduct met the elements of the abuse of subsidized LPG transportation and trading as stipulated in the law according to the legal facts at trial and supported by expert witnesses.

The element "who does, who commands to do, and who participates in doing"

If more than one person is present in a criminal act, each playing a certain role, this is known as a form of participation "*participation*," as explained in Article 55 paragraph (1) 1 of the Criminal Code (Dimitriadis & Kefalaki, 2024). The trial evidence shows that the defendant Dedi is the main perpetrator and the owner of the business place that is the object of the case; he was responsible for initiating the plan, hiring Defendant Sokman, and moving subsidized LPG gas to gas cylinders *Portable*. On the other hand, the defendant Sokman was the person who participated in the act by helping to move subsidized LPG gas to the gas cylinder *Portable* according to the instructions of the Defendant Dedi. The two defendants worked together to commit the crime, using modified tools, and they did so several times for financial gain. Participation in crime can be shown in the sharing of responsibility, cooperation, and mutual understanding during the execution of the act. Given that the defendants worked together to commit the illegal act in a complementary manner, the evidence presented at trial supported the conclusion that the requirement of "participation in committing" had been met. The criminal liability analysis can be used to determine the legal liability of those who abuse the transportation and trade of subsidized 3 kg LPG. A person's behavior during the commission of a crime gives rise to their criminal responsibility. Criminal liability refers to the legal consequences that a person may suffer as a result of their actions in violation of the applicable criminal laws. (Lewokeda, 2018) Simply put, a person can be held accountable if the behavior in question is regulated by law. Criminal liability or criminal liability is another name for criminal accountability in the context of criminal law (Wahyuni et al., 2021). If a person cannot be held accountable under criminal law, then it is impossible to punish him for committing a crime. The concept of legality is the main guideline in terms of illegal activities; This concept affirms that if there is no wrongdoing, then there should be no punishment (Munthe, 2026) In the case of criminal liability, which contributes directly to the fundamental rights of the subject of the law, it is an important part of material criminal law related to how a person can be sentenced to criminal sanctions. According to Moeljatno, to ensure legal responsibility related to a crime that in the case of criminal liability that contributes directly to the human rights of the subject of law, it is an important part of material criminal law related to how a person can be sentenced to criminal sanctions. However, justice in the eyes of the law cannot be considered absolute but relative, especially in cases involving the illegal exploitation of the transportation and trade of subsidized 3 kg LPG

Inequality can occur due to differences in the application of criminal punishment, which gives the impression that the law seems sharp downwards but blunt upwards. Thus, instead of focusing solely on punishment, law enforcement must consider substantive justice and social benefits when dealing with the abuse of subsidized 3-kilogram LPG (Munthe, 2026). As a result, the law is not just a weapon of oppression; The law can also realize justice and order.

The formulation of the lawmaker's thoughts as outlined in the legal regulations also determines how law enforcement is carried out. Thus, in turn, the law enforcement process culminates in its implementation by the law enforcement officials themselves. (Akhmaddhian, 2016)

Cracking down on the misuse of subsidized 3 kg LPG transportation and trade is one of the government's steps to ensure the accuracy of energy subsidies. Detailed rules on the abuse of subsidized LPG are regulated in Article 55 of Law of the Republic of Indonesia Number 22 of 2001 concerning Oil and Gas as amended in Article 40 of Law of the Republic of Indonesia Number 6 of 2023 concerning the Stipulation of Government Regulations in Lieu of Law Number 2 of 2022 concerning Job Creation into Law Jo. Article 55 paragraph (1) 1 of the Criminal Code. This shows how the country mostly uses criminal law to tackle related crimes in the energy sector. Theoretically, the purpose of law enforcement is to provide legal certainty, justice, and utility. According to Soerjono Soekanto, the effectiveness of law enforcement is influenced by five factors, namely the substance of the law, law enforcement apparatus, infrastructure, society, and legal culture.

Although every element of the criminal act is met, the judge does not always impose the maximum sentence. According to the punishment outlined in Article 55 of Law of the Republic of Indonesia Number 22 of 2001 concerning Oil and Gas as amended in Article 40 of Law of the Republic of Indonesia Number 6 of 2023 concerning the Stipulation of Government Regulations in Lieu of Law Number 2 of 2022 concerning Job Creation into Law, namely a maximum prison sentence of 6 (six) years and a maximum fine of IDR 60,000,000,000, 00 (sixty billion).

Based on an interview with Mrs. Yanti Romlahayati as the Registrar of the Cirebon District Court on April 7, 2026. It is known that the judge imposed a sentence of 1 (one) year and 6 (six) months and a fine of Rp 5,000,000.00 (five million rupiah), with the consideration that the judge has the freedom to make a verdict based on his own beliefs. In addition, there are mitigating matters for the defendants that are also the basis for imposing lighter sentences, such as the defendants admitting to being frank so as to facilitate the course of the trial, the defendants behaving politely, the defendants regretting their actions, and the defendants have never been convicted (Shodikin et al., 2026). This is in line theoretically because, according to Barda Nawawi Arief, punishment is not only oriented towards retribution, but must also consider aspects of utility, justice, and the individual condition of the perpetrator. Thus, the imposition of relatively light penalties can be understood as a form of application of the principle of criminal individualization.

Furthermore, if analyzed using the theory of justice, the judge's decision can be seen as an effort to realize individual justice (*Individual Justice*), namely justice that takes into account the personal circumstances of the perpetrator and mitigating factors. Therefore, in the decision of the Cirebon District Court, if viewed from the impact caused, namely the state loss for the incident mentioned above is approximately Rp175,200,000.00 (one hundred and seventy-five million two hundred thousand rupiah), the actions of the perpetrators not only have an impact on the aspect of violating the law, but also cause state financial losses due to the inappropriate distribution of subsidies. Therefore, the judge's decision to impose a relatively light sentence can still be debated in the perspective of substantive justice, that is, justice that focuses on the interests of the wider community. In line with this, the factor of weak government supervision in the distribution of subsidized LPG is also considered by judges in looking at the

responsibility of the perpetrators, especially in assessing the level of error and the background of the acts committed. This condition shows that the perpetrator's actions are not completely independent, but are influenced by gaps in the distribution system that allow abuse to occur.

Therefore, it can be analyzed that in the decision of the Cirebon District Court Number 51/Pid.Sus/2025/PN Cbn in the case of the abuse of the transportation and trade of subsidized 3 Kg LPG, the actions of the perpetrators show the existence of elements *Mens Rea* (*guilty mind*), namely the intentionality of committing acts that are contrary to legal norms. This can be seen from the actions of the perpetrators who consciously moved subsidized 3 Kg LPG into the cylinder *Portable* non-subsidized for commercial purposes in order to obtain economic benefits that qualify as a criminal offense in violation of Article 55 of Law of the Republic of Indonesia Number 22 of 2001 concerning Oil and Gas as amended in Article 40 of Law of the Republic of Indonesia Number 6 of 2023 concerning the Stipulation of Government Regulations in Lieu of Law Number 2 of 2022 concerning Job Creation into Law Jo. Article 55 paragraph (1) 1 of the Criminal Code. Thus, in addition to fulfilling the elements of criminal acts (*Actus Reus*), the perpetrators also meet the element of guilt with malicious intent (*Mens Rea*), so that it deserves to be held criminally accountable.

CONCLUSION

Based on the results of research in the case of the misuse of subsidized 3 Kg LPG transportation and trading, it can be concluded that criminal liability in the court decision Number 51/Pid.Sus/2024/PN Cbn, namely the perpetrator was sentenced to 1 (one) year and 6 (six) months and a fine of Rp. 5,000,000.00 (five million rupiah) turned out to not reflect justice both for the community as a subsidy recipient, the state as a subsidy budget provider, as well as for LPG business actors who carry out their business activities legally, considering that the abuse of subsidized LPG has an impact on untargeted distribution, potential state losses, and the creation of unfair business competition. This condition is further strengthened by the imposition of criminal sanctions that are relatively lighter than the provisions of Article 55 of Law of the Republic of Indonesia Number 22 of 2001 concerning Oil and Gas as amended in Article 40 of Law of the Republic of Indonesia Number 6 of 2023 concerning the Stipulation of Government Regulations in Lieu of Law Number 2 of 2022 concerning Job Creation into Law Jo. Article 55 paragraph (1) 1 of the Criminal Code. Therefore, law enforcement against the crime of misuse of subsidized 3 Kg LPG should not only be oriented towards legal certainty, but must also pay attention to aspects of justice and utility. Thus, the law can function optimally as a means to create order, provide protection to society, and realize social justice as a whole.

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