

Analysis of the Dynamics of the Mechanism of Limitation of Executive Power in Southeast Asia Between Indonesia and Thailand

¹Rizal Wahid Ramadhani Atmaja

¹Faculty of Law, Sultan Agung Islamic University

*Corresponding Author:
ramadhaniwahid989@gmail.com

Abstract

The dynamics of constitutionalism and the limitation of executive power in Indonesia and Thailand are in a phase where executive power is on the path of absolute Constitutionalism plays a fundamental role in limiting state power and ensuring that government authority operates within ethical, legal, and democratic limits. Indonesia and Thailand offer examples of contrasting constitutional developments in Southeast Asia. After the 1998 Reformasi era, Indonesia succeeded in strengthening the checks and balances mechanism through the establishment of the Constitutional Court, decentralization reform, and the empowerment of independent supervisory bodies. By using a normative-empirical qualitative approach. Constitutionalism as the foundation of democracy in Southeast Asia is tested through a comparison of formal institutional design with real political practice. Indonesia after the 1998 Reform built a strong framework of checks and balances through the amendment of the 1945 Constitution and the establishment of the Constitutional Court. Its effectiveness is hampered by executive dominance and informal practices. Thailand shows an illiberal trajectory of constitutionalism marked by repeated military interventions, the constitution is used to legitimize authoritarianism, making formal institutions lose autonomy. The result is that the success of power limits does not depend solely on institutional design, but rather on a consistent political commitment to uphold the law in the midst of pressure from informal forces. Synthesize the existing scientific literature and identify critical research gaps related to the study of constitutionalism in both countries. First, there is still a scarcity of long-term empirical and quantitative studies examining the effectiveness of constitutional restrictions on executive, legislative, and judicial power. Second, current research has not sufficiently examined informal political practices, including patronage networks, the influence of oligarchs, and the military camp in state institutions, comparative constitutional studies of which are still limited. The study examined the existing scientific literature and identified critical research gaps related to the study of constitutionalism in both countries, The findings of this review highlight the need for more in-depth interdisciplinary research, which integrates political science, legal studies, and institutional analysis to better understand the development of constitutionalism in Southeast Asia.

Keywords: Constitution, Executive, Democracy, Checks And Balance, Dynamics

1. INTRODUCTION

Constitutionalism affirms the idea that state power must be limited by laws and institutions so as not to slide into tyranny. This principle is the foundation for democracy, human rights protection, and long-term political stability (Sadi Isra, 2019). In the Southeast Asian region, the dynamics of constitutionalism present an interesting variety of paths. Constitutionalism and power restrictions are at the core of modern governance, especially in the Southeast Asian region which is struggling in the process of consolidating democracy. Indonesia has established the presidential system as the system of government it adheres to. The presidential system in Indonesia is affirmed in Article 4 paragraph 1 of the 1945 Constitution which states that "the President of the Republic of Indonesia holds the power of government according to the Constitution". In addition to this, the power of state government by the president is also regulated in Chapter III of the 1945 Constitution concerning State Government Power. Chapter III of the 1945 Constitution contains 17 articles that regulate various aspects regarding the president and presidential institutions, as well as the authority they have in holding government power (Taufiqur, 2024).

The health of a political system is often measured by the effectiveness of mechanisms designed to prevent the accumulation and abuse of power by the executive branch. The principle of checks and balances is not just a structural norm, but a sustainable dynamic that must be able to adapt to domestic and regional political pressures. Indonesia and Thailand show case studies that are very rich in this understanding. Indonesia, after the 1998 Reformasi era, adopted a presidential system that was strengthened by significant constitutional amendments. Although institutional frameworks including the House of Representatives and the Constitutional Court have been established to oversee the President, political realities indicate a tendency for executive domination, often through the mastery of legislative agendas or the issuance of regulations that have high legal force.

An in-depth analysis is needed to understand how these restrictive mechanisms function dynamically when dealing with political maneuvers and the interests of a parliamentary majority that supports the government. Indonesia and Thailand, which show the important difference between formal institutional design and real political practice. Indonesia after the 1998 Reform underwent significant constitutional restructuring through a series of amendments to the 1945 Constitution and the establishment of constitutional supervisory institutions such as the Constitutional Court, as well as the strengthening of independent institutions intended to strengthen the checks and balances mechanism (Palguna, 2013). In practice, these formal institutions have become an important arena for constitutional litigation and constitutional law enforcement, while the public sphere including the media and civil society plays an active supervisory role.

However, the existence of formal mechanisms does not automatically eliminate the influence of informal practices, such as political patronage, coalition dominance, and elite negotiations, which often weaken the effectiveness of power control. On the other hand, Thailand's political landscape is characterized by a chronic cycle of instability, characterized by repeated military interventions and frequent constitutional changes in response to political crises. In Thailand, the limitation of executive power is often not

only dependent on formal constitutional institutions, but also influenced by non-elected forces that have a great deal of influence in the structure of the state. This creates a paradox that, despite formal efforts to limit the executive, the legitimacy and sustainability of such restrictions are often threatened by extra-constitutional interventions. The comparison between these two countries has become very relevant. Indonesia represents a relatively stable model of civil democracy (despite facing accountability challenges), while Thailand represents a system that is constantly undergoing institutional resets.

His Highness King Maha Vajiralongkorn Bodindadbavarangjun is pleased to state that the Prime Minister has respectfully informed that since Phrabat Somdet Phra Paramintharamaha Prajadhipok Phra Pokklao Chaoyuhua kindly gave the Constitution of the Kingdom of Siam BE 2475 (1932), Thailand has continued and always maintained its intention to adhere to a regime of democratic government with the King as Head of State. Although the Constitution has been repealed, amended, and promulgated to reorganize the government, stability and order are still unstable due to various problems and conflicts. Sometimes the event turns into a constitutional crisis that cannot be resolved. This is due to, among other things, the existence of individuals who ignore or do not obey the rules of the constitution, which include abuse of power and lack of a sense of responsibility towards the nation and society, military intervention also has an impact on the political stability of the Thai state, resulting in ineffective law enforcement.

Thailand has shown a more turbulent trajectory, characterized by repeated cycles of military coups and frequent constitutional changes. The mechanism of limiting executive power in Thailand often relies on non-democratic interventions, such as the role of the military and the monarchy, which periodically "reset" the political system when executive power is deemed out of line or corrupt. This creates a framework in which the limitation of power is more optional and relies on power outside of formal constitutional structures, as opposed to a system that relies on established civil institutions. Where the tradition of military coups and the intervention of armed forces has resulted in a pattern that is often called illiberal constitutionalism, namely the use of constitutions and legal instruments to engineer political stability that maintains the dominance of non-democratic actors (Dressel, 2010). The coups of 2006 and 2014 had implications for the formation of new constitutions that strengthened the role of the military and institutions friendly to authoritarian interests, while limiting the space for public scrutiny and political opposition (Chambers, 2017). In this context, formal institutions such as courts and independent commissions often serve as instruments to paralyze political opponents rather than as proponents of independent constitutional control.

The difference in the institutional control capacity of the two countries can also be seen in the level of civil society participation. In Indonesia, protest movements, media freedom, and strategic litigation serve as counter-powers that add to the durability of the power limitation mechanism, although the 1945 Constitution has provided fairly detailed limits on the limits of the president's executive authority, in fact there are still some problems. For example, what is meant by the power of government held by the president as stipulated in Article 4 paragraph 1 of the 1945 Constitution, whether the president has other powers other than those that have been regulated in the 1945 Constitution which are an inherent part of the power of the government, and whether the House of Representatives has the authority to increase or decrease the power of the president

through their legislative power, the limitation of the power of the President in the 1945 Constitution can also be seen in Article 20 paragraphs (2) to paragraph (5) which regulate the President's participation in the formation of laws.

Although the power to form laws is the territory of the legislative institution/DPR, the President still gets a very important role because according to Article 20 of the 1945 Constitution, every draft law is discussed by the House of Representatives and the President for mutual approval. Furthermore, the President ratified the draft law that had been mutually agreed to become law. However, in the event that the jointly approved bill is not ratified by the President within thirty days of the approval of the bill, the bill shall become law and shall be promulgated. The President in Indonesia, who still has a role in the discussion of laws which is the domain of legislative power, is indeed different from countries that adhere to a purely presidential system such as the United States (Indravana, 2008).

In Thailand, by contrast, pro-democracy movements often face legal restrictions and repressive measures, limiting the effectiveness of social control. Academic studies have so far reviewed the normative and textual aspects of the constitution or described formal institutions, but a systematic empirical analysis of the effectiveness of power limitation mechanisms, especially those that combine interaction between formal institutions and informal practices, is still limited, especially for the cutting-edge period of 2014–2025. This analysis aims to identify similarities and differences in executive power restriction strategies, both formal (legal) and informal (political and cultural). Although there has been a lot of research on the constitutions of Indonesia and Thailand separately, there is a significant research gap in comparative analysis of the dynamic mechanisms of executive power restrictions in the face of contemporary challenges in both countries.

This research seeks to fill this gap by focusing on the interaction between supervisory institutions and executive actions, providing important insights for understanding the evolution of democracy in the Southeast Asian region.

2. METHODS

This study uses a qualitative approach with a normative-empirical type of legal research. A normative approach is used to examine constitutional provisions, laws and regulations, and the doctrine of constitutionalism in Indonesia and Thailand related to the limitation of executive power. Meanwhile, an empirical approach is used to look at institutional dynamics and political practices through secondary data in the form of previous research results, reports from international institutions, media, and official government documents. Normative research means research that focuses on a legal rule or regulations that are then related to the reality in the field (Amiruddin, 2010).

Thus, this study not only emphasizes the analysis of the constitutional text, but also on its implementation in political practice. Data collection is carried out through library research and document searching. Primary data sources include the Indonesian constitution 1945 Constitution and the constitution of the Kingdom of Thailand, Buddhist Era 2550 (2007) and the Constitution of the Kingdom of Thailand, Buddhist Era 2560

(2017). As well as relevant decisions of the Indonesian Constitutional Court and the Constitutional Court of Thailand. Secondary data sources include books, academic journals, research institution reports, and media articles discussing the practice of limiting executive power. Data was also compiled from reports from international institutions such as Freedom House and IDEA (International Institute for Democracy and Electoral Assistance) which highlighted the quality of democracy and executive power in both countries. Data analysis was carried out by descriptive-comparative method. First, constitutional data were analyzed descriptively to find the institutional design of limiting executive power in each country. Second, political practice data is analyzed through systematic comparisons between Indonesia and Thailand to assess the gap between constitutional norms and political reality. This analysis technique allows researchers to find patterns of similarities and differences, as well as identify institutional and political factors that support or undermine the effectiveness of limiting executive power in constitutionalism in both countries.

3. RESULTS AND DISCUSSION

Constitutionalism is a fundamental idea that asserts that state power must be limited by laws and institutions to prevent a shift toward tyranny, making it the foundation for democracy and the protection of human rights. In the Southeast Asian region, the dynamics of the application of this principle show interesting variations in paths, especially when political systems such as the presidential system adopted by Indonesia struggle to consolidate democracy. The health of political systems is often measured by the effectiveness of checks and balances mechanisms that prevent the accumulation of executive power, but the case studies of Indonesia and Thailand highlight the sharp differences between formal institutional design and actual political practice. Indonesia, after the 1998 Reformasi, adopted a presidential system that was strengthened through significant amendments to the 1945 Constitution, where the power of the President's government was regulated in Article 4 paragraph 1 and Chapter III. Although formal institutional frameworks such as the House of Representatives (DPR) and the Constitutional Court (MK) have been established to oversee the President, political realities often show a tendency for executive domination, which is manifested through mastery of the legislative agenda or the issuance of high-force regulations. The restriction mechanism in the formation of laws, which is regulated in Article 20 of the 1945 Constitution, requires mutual agreement between the President and the House of Representatives, according to Denny Indrayana, the absence of the president's authority to refuse to ratify bills from the House of Representatives does not mean that the President in Indonesia does not have the right of veto. The 1945 Constitution stipulates that every draft law is discussed by the House of Representatives and the President for mutual approval (Amieudin, 2004). However, this is different from the purely presidential system. Moreover, despite detailed constitutional limitations, informal practices such as political patronage and coalition dominance often undermine the effectiveness of formal power control. On the other hand, civil society participation, media freedom, and strategic litigation in Indonesia function as crucial counter power in increasing the durability of the restriction mechanism (Asshiddiqie, 2006).

A major change in Indonesia's constitutional structure occurred after the 1998 Reform, when the people's demand for an end to the centralistic power of the New Order

peaked. The 1997–1998 Asian economic crisis, which was exacerbated by corruption, collusion, and nepotism (KKN), showed the weak system of oversight of executive power. The reform then gave rise to the constitutional amendment agenda which lasted for four stages, namely from 1999 to 2002 and resulted in fundamental changes in the 1945 Constitution. This amendment affirms the principle of limiting executive power by expanding legislative authority, changing the mechanism for direct presidential election, and establishing the Constitutional Court as the guardian of constitutionalism. Thus, after 1998, Indonesia began to transition from a presidential system that tended to be authoritarian to a more democratic system with a relatively clear checks-and-balances mechanism.

One of the important milestones of the limitation of power was the establishment of the Constitutional Court (MK) in 2003. The Constitutional Court is designed as a constitutional guardian with the authority to test laws against the 1945 Constitution, decide disputes over the authority of state institutions, dissolve political parties, and decide disputes over election results. This judicial review function is a new breakthrough in the history of Indonesian law because previously only the Supreme Court had the authority to assess regulations under the law. The existence of the Constitutional Court shows the adoption of a constitutional court model in the style of Continental Europe, especially Germany and Austria, but with a touch of Indonesian character, namely providing a central role in overseeing transitional democracy. However, the effectiveness of the Constitutional Court is not only determined by legal norms, but also by the capacity of constitutional judges, personal integrity, and the accompanying political pressures.

In addition to the role of the Constitutional Court, changes in the structure of the House of Representatives are also an important instrument in balancing executive power. The constitutional amendment strengthens the position of the House of Representatives as a legislative institution that not only makes laws, but also supervises the running of government through the right to interpellation, inquiry, and express opinions. However, political practices often feature different faces. The dominance of major parties in the government coalition makes the supervisory function of the House of Representatives weaker because of partisan interests, which take precedence over the interests of checks-and-balances. This phenomenon was evident during the administrations of President Susilo Bambang Yudhoyono (2004–2014) and President Joko Widodo (2014–2024), where fat coalitions created formal political stability but eroded the effectiveness of the supervisory function (Prabandani, 2015).

In addition to the Constitutional Court and the House of Representatives, power restrictions are also realized through independent institutions such as the Corruption Eradication Commission (KPK), the General Election Commission (KPU), the Judicial Commission (KY), and the Ombudsman. This institution reflects the trend of the fourth branch of government which functions to control the behavior of the executive and legislative institutions. The KPU, for example, is designed to ensure the integrity of elections, while the KPK was formed to eradicate corruption that is rooted in the bureaucracy. However, the independence of this institution is often disturbed by political intervention. The case of the revision of the KPK Law in 2019 shows that the mechanism of limiting power can be weakened through legislative instruments. This phenomenon shows that the limitation of power is not only a matter of institutional design, but also of practical political dynamics.

Although formal mechanisms have been established, informal practices such as patronage politics and oligarchy continue to dominate. Post-Reform Indonesian democracy was often controlled by an alliance of oligarchs that relied on economic resources to maintain power. Although the Constitutional Court or KPK has formal authority, political actors with business networks can control the direction of policies and legislation. This patronage works through political financing, division of positions, and legal intervention. As a result, formally regulated restrictions on power run the risk of becoming ineffective because informal practices are more dominant.

The weakness of the limitation of power is increasingly evident in concrete cases. For example, the revision of the 2019 KPK Law, which reduced the independence of anti-corruption institutions, caused a wave of student protests in various regions with the slogan #ReformasiDikorupsi. This case shows how political coalitions in the House of Representatives and the government can work together to weaken the mechanism of limiting power. In fact, the KPK was previously a symbol of the success of post-Reform democracy. The revision also shows that the limitation of power is not final, but is always contested by political actors. Integrity issues also arise in the Constitutional Court body itself. The bribery scandal involving Constitutional Court Chairman Akil Mochtar in 2013 showed the fragility of constitutional ethics in Indonesia. This case not only tarnishes the authority of the Constitutional Court, but also raises questions about the effectiveness of limiting power through the judiciary. Although internal reforms were carried out later, including the establishment of the Constitutional Judges' Ethics Council, public trust in the Constitutional Court had declined drastically. This confirms that legal institutions are inseparable from structural and cultural weaknesses, which ultimately reduce the reach of power limitations.

Thus, the mechanism of limiting power in post-Reform Indonesia presents a paradox. Formally, Indonesia has succeeded in building an institution of checks-and-balances through constitutional amendments, the Constitutional Court, the House of Representatives, and independent institutions. However, in practice, power remains vulnerable to abuse due to the dominance of patronage, oligarchy, and weak political ethics. The difference between constitutionalism in law and constitutionalism in practice becomes clear: constitutional texts promise limits on power, but their implementation is still often influenced by informal power. Therefore, an in-depth study of Indonesian constitutionalism does not stop at formal analysis, but must also pay attention to the dimensions of socio-political practice.

In this regard, it intends to delve deeper into the limits of the president's executive power other than those that have been regulated in the 1945 Constitution, especially related to the question of whether the president has prerogatives or inherent rights inherent in his power with and/or without being given textually by the 1945 Constitution?, understanding the limits of the president's executive power will be carried out through a historical approach practices), constitutional theory and its comparison with other countries (legal comparison) (Kanang, 2018). Apart from the polemic of limiting presidential power mentioned above, according to the author, it is indeed necessary to limit the president's power in exercising his authority because if not, then the President can exercise his power absolutely or can act indefinitely. Therefore, it is very necessary to have a mechanism of mutual control and balance (checks and balances) between the legislative, judiciary and executive branches of power.

Thailand presents a very different constitutional dynamic from Indonesia, even though they are both in the Southeast Asian region. Since the 2006 military coup that toppled Prime Minister Thaksin Shinawatra, Thailand has entered a recurring cycle of political instability. The subsequent coup in 2014 under the leadership of General Prayuth Chan-ocha further strengthened the tradition of militarism in Thai politics. Instead of establishing effective checks-and-balances mechanisms, the constitutions born post-coup tended to be designed to legitimize military power and limit the space for political opposition. Thus, Thai constitutionalism can be categorized as illiberal constitutionalism, where legal texts serve to strengthen authoritarian dominance instead of limiting state power (Mericaeu, 2019).

Thailand's 2007 and 2017 constitutions are a clear example of how the law is designed and used to strengthen military power. The 2007 constitution expands the powers of the Constitutional Court and independent bodies to oversee elected politicians, but does not provide a balanced accountability mechanism for the military's role. A similar thing can be seen in the 2017 Constitution, which gives the military junta's post-2014 ruling National Council for Peace and Order (NCPO) the power to appoint members of the Senate for five years. As a result, even if the elections were still held, the results were easily manipulated through the intervention of the military-controlled senate. This system creates legal authoritarianism, where legal instruments are used to justify non-democratic domination.

The role of the Constitutional Court in Thailand is very different from Indonesia. If the Indonesian Constitutional Court is seen as the guardian of the constitution, the Thai Constitutional Court is often accused of playing a political instrument that sides with the military elite and the monarchy. Several controversial decisions, such as the dissolution of the Thai Rak Thai Party (2007), the People's Power Party (2008), and the Future Forward Party (2020), show how legal mechanisms are used to erode the power of the political opposition. The Constitutional Court in Thailand thus functions not as a power counter, but as an instrument that reinforces the authoritarian status quo. In addition to the judiciary, other independent institutions such as the General Election Commission (EC) and the Anti-Corruption Commission (NACC) are also often used as political tools. In many cases, these institutions are not neutral, but rather influenced by military interests. For example, the EC's decision to disqualify opposition candidates in the 2019 elections shows the institution's alignment with the military government. This indicates that although formally independent institutions were formed to limit power, in practice they actually extended military control.

The political culture of patronage in Thailand reinforces the informal dominance of the military. Thailand's political system is often described as a bureaucratic polity, where bureaucrats and the military ally with the monarchy as well as large business groups to maintain power. This patronage works through the provision of economic resources, the distribution of positions, and political protection. In this context, the limitation of power is unlikely to be effective because informal relations are more dominant than formal rules. Thus, this phenomenon suggests that Thai constitutionalism is strongly influenced by the interaction between formal institutions and informal practices that are hierarchical.

Thailand's 2017 constitution specifically shows a tendency towards militarised constitutionalism. In addition to controlling the Senate, the constitution also establishes a mixed electoral system that makes it difficult for opposition parties to gain a majority in the House of Representatives. In fact, the prime minister can be elected not only from among parliamentarians, but also from outside, thus paving the way for military figures to remain in power. Such a design emphasizes that the limitation of power is pseudo, the constitution is used as an instrument to ensure the permanence of power, not to limit the authority of the state (Sawasde, 2018). Thailand's political situation also shows the weak participation of civil society in monitoring power. Although there are pro-democracy movements, such as the 2020 student protests demanding monarchy reform and political democratization, the movement has faced harsh repression from the authorities. The military regime used national security laws and *lèse majesté* laws to silence critics. This shows that the limitation of power not only fails at the institutional level, but is also rejected through repression of civil liberties.

Thus, the mechanism for restricting power in Thailand is paradoxical formally, there is a constitution, judiciary, and independent commissions, but substantively these institutions are used to reinforce authoritarianism. In contrast to Indonesia, which has been relatively successful in strengthening checks-and-balances despite being hampered by patronage, Thailand has actually experienced the institutionalization of military dominance in the legal structure. This phenomenon emphasizes the importance of distinguishing between constitutionalism as a text and constitutionalism as a practice. In the Thai context, constitutionalism serves as a legal legitimacy for authoritarian power, not as an instrument of its limitation (Chambers, 2017).

Institutionally, the difference between these two countries lies in the extent to which formal institutions can function independently and accountably. In Indonesia, although constitutional institutions have been built on democratic principles, their effectiveness is still hampered by informal practices such as transactional politics, the influence of economic oligarchs, and weak political ethics. In contrast, in Thailand, formal institutions lose their autonomy because they are integrated with military and monarchical power structures. This condition shows that good institutional design does not necessarily guarantee the upholding of constitutionalism if it is not followed by a political commitment to consistently uphold legal principles. Therefore, the effectiveness of power restrictions is more determined by the synergy between the strength of legal institutions and a democratic political culture.

In the context of political culture, Indonesia has relatively shown a more open space for civil society participation through free media, student movements, and strategic litigation. This mechanism provides social pressure on the government to remain within the constitutional corridor. Instead, Thailand faces a crackdown on civil liberties through national security laws and *lèse majesté* articles that are used to silence criticism of the government and the monarchy. This difference in the level of political freedom shows that the success of constitutionalism depends not only on institutional power, but also on the public space that allows the public to play an active role in supervising state power.

A comparison of Indonesia and Thailand shows two different paths of constitutionalism, Indonesia emphasizes the formal strengthening of democratic institutions with the challenge of informal practices, while Thailand uses legal formalities

to legitimize authoritarian power. This kind of comparative study opens up opportunities for further research, especially regarding the interaction between formal and informal mechanisms, the role of civil society, and the dynamics of constitutionalism in the period 2014–2025 which are still little studied. This kind of analysis is important to understand how countries with different historical and political contexts manage power constraints.

4. CONCLUSION

The dynamics of constitutionalism in Southeast Asia, especially between Indonesia and Thailand, show the paradox between the text of the constitution and political practice in limiting executive power. Indonesia, after the 1998 Reform, succeeded in building a relatively clear institutional architecture of checks and balances through the amendment of the 1945 Constitution, the establishment of the Constitutional Court (MK), and the strengthening of independent institutions such as the KPK. Nevertheless, the formal effectiveness of these institutions is continuously eroded by informal practices such as patronage politics, the dominance of major party coalitions, and the influence of economic oligarchs, which often weaken the oversight function of the House of Representatives and test the integrity of constitutional institutions such as the Constitutional Court.

Fundamentally different, Thailand displays a trajectory of constitutionalism dominated by extra-constitutional interventions, leading to illiberal constitutionalism or militarised constitutionalism. In Thailand, the constitution and formal institutions, including the Constitutional Court and independent commissions, are often used as instruments to legitimize and strengthen the dominance of non-democratic actors, such as the military, rather than serving as independent limits to power. Therefore, the restriction of power in Thailand is more facultative and relies on informal hierarchical structures, while in Indonesia, despite the challenges of informal practice, the space for civil society participation and freedom of the press still exerts crucial social pressure on executive power. Definitively, the comparison of these two countries underscores that the success of constitutionalism in limiting state power depends not only on a democratic institutional design on paper, but is largely determined by a consistent political commitment to upholding the law as well as the level of political cultural resistance to informal forces that seek to dominate or distort formal accountability mechanisms.

BIBLIOGRAPHY

- Amirudin and Zainal Asikin, (2004), *Introduction to Legal Research Methods*, Raja Grafindo Persada, Jakarta, 2004
- Abdul Rahman Kanang, (2018), Discourse on Limiting Presidential Power in the Presidential System According to the 1945 Constitution, *Al-Daulah*, Vol. 7, No. 1, pp 167. B
- Björn Dressel, (2010), When Notions of Legitimacy Conflict: The Case of Thailand, *P&P Journal*, Vol. 38, No. 3, pp 445.

- Chambers & Waitoolkiat, (2017), *The Political Economy of the Military in Southeast Asia*, The University Of Chicago Press, Illinois, hlm 80.
- Denny Indrayana, (2008), *Indonesian Constitutional Reform 1999-2000, An Evaluation of Constitutional Making in Transition*, Kompas Media Nusantara, Jakarta.
- Hendra Wahanu Prabandani, (2015), Constitutional Limits Of The Presidential Executive Power, *Legislative Journal*, Jakarta, pp 7.
- Jimly Asshiddiqie, (2006), Development and Consolidation of Post-Reform State Institutions, *Secretariat General of the Constitutional Court of the Republic of Indonesia*, Jakarta, pp 117.
- Mohammad Haris Taufiqur Rahman, (2024), The Limits of Presidential Power in the Indonesian Constitution, *Constitution Journal*, Vol, 3, No. 1, 2024, pp 43.
- Mérieau, E, (2019), Illiberal constitutionalism in Thailand: The legal–military alliance, *Asian Journal of Comparative Law*, Vol. 14, No. 2, pp 221.
- Palguna, (2019), *Constitutional Court, Judicial Review and Welfare State*, Sinar Grafika, Jakarta, 2013
- Sawasdee, S. N, (2018), A tale of two hybrid regimes: Cabinets and parliaments in Indonesia and Thailand. *Japanese Journal of Political Science*, Vol. 18, No. 3, pp 345.
- Saldi Isra, (2019), *Constitutional Law Thoughts*, Rajawali Press, Jakarta.