Indonesian Journal of Business Analytics (IJBA)
Vol. 5 , No. 6 (December) 2025: 3846-3859

Evaluation of the Role of Public Accountants on the Application of Know your Customer Principle to Assess Client Risk in Preventing Money Laundering (Case Study on Public Accounting Firm in Yogyakarta Area)

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A R T I C L E I N F O

Keywords : Principles of Recognizing Service Users (PMPJ), TPPU, Public Accountants

Received : 20, October
Revised : 22, November
Accepted: 24, December

A B S T R A K

The purpose of this study is to describe the implementation and strategy of PMPJ implementation by Public Accountants (KAP) in the Yogyakarta region. In addition, this study also aims to understand the role of public accountants in the Yogyakarta region related to the implementation of PMPJ to assess client risk in preventing money laundering. This study uses a qualitative descriptive research method with a case study approach. There are two types of data sources used in this study: primary data obtained through in-depth interviews with KAPs in the Yogyakarta region using convenience sampling techniques and secondary data obtained through data related to PMPJ policies. The findings of this study, informants from four KAPs in the Yogyakarta region have implemented PMPJ in accordance with regulatory guidelines, namely SE Number 7/PPPK/2019. The role of public accountants in efforts to prevent money laundering is still necessary. In addition, auditing financial statements is also an obligation for companies and a form of professionalism of public accountants based on the principles of the profession, namely the embodiment of integrity and compliance with regulations.

DOI: https://doi.org/10.55927/ijba.v5i6.15905
ISSN: 2808-0718
https://journal.formosapublisher.org/index.php/ijba

INTRODUCTION

Corruption remains a serious issue affecting many countries around the world. It poses a significant threat that can erode public trust and cause substantial harm to society. Corrupt behavior is widely regarded as a major obstacle to development and economic growth, weakening public institutions and undermining public confidence in governments and public institutions (Jeppesen, 2019). Corruption has become such a grave crime that efforts to eradicate it must be carried out through extraordinary mechanisms, involving concrete, firm, and clear measures, as well as the engagement of all potential elements within society, particularly government officials and law enforcement agencies (Susiani et al., 2020).

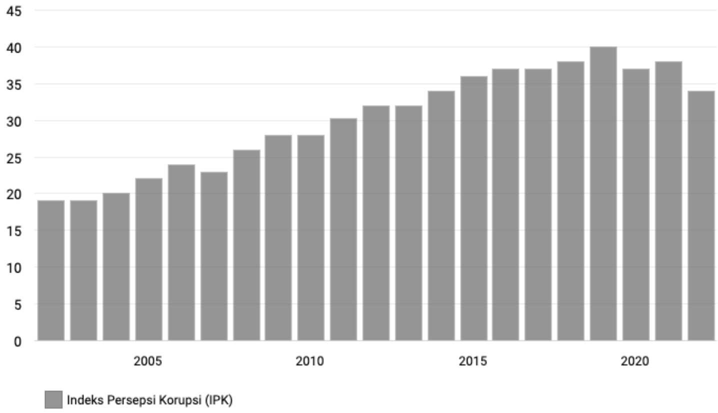

Figure 1.1 Corruption Perception Index (CPI) Graph 2002–2022
Source: PPATK 2023

Based on monitoring by Indonesia Corruption Watch (ICW) as shown in Figure 1.1, Indonesia's Corruption Perceptions Index (CPI) fell by four ranks by the end of 2022. The score declined from 38 in 2021 to 34 in 2022, placing Indonesia at 110th out of 180 countries. The 2020 report also indicated a decline, with the score decreasing from 40 in 2019 to 37. Moreover, within Southeast Asia, Indonesia ranked first as the most corrupt country (Indonesia Corruption Watch, 2023). Along with the increase in corruption cases, data from reports of the Financial Transaction Reports and Analysis Center (PPATK) show a rise in the number of suspicious transaction reports received by PPATK up to 2022 (Ahdiat, 2023).

The increase in corruption cases has been accompanied by a corresponding rise in reports of suspicious transactions in PPATK reports, as presented in Figure 1.2 (N et al., 2019). Money laundering is a process in which individuals act to conceal the existence of funds derived from illegal activities or unlawful acts (Albrecht et al., 2012; Grosu et al., 2022). It is carried out to disguise such funds as if they originate from legitimate sources (Albrecht et al., 2012).

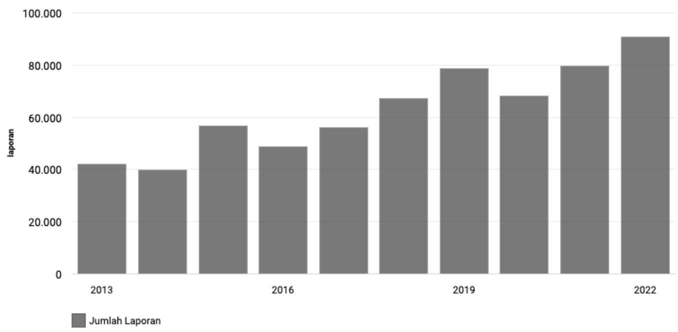

Figure 1.2 Graph of the Number of Suspicious Transactions 2013–2022
(Source: PPATK 2022)

This condition is reflected in factual cases that have occurred, resulting in state losses arising from such criminal acts. The Duta Palma Group case owned by Surya Darmadi revealed that between 2003 and 2022, corruption and money laundering were committed, causing state losses amounting to IDR 100 trillion (Putri, 2024). The money laundering was carried out through subsidiaries of the Darmex Group. Proceeds of corruption originating from his palm oil companies were placed and transferred to the parent company, PT Darmex Plantation, in the form of shareholder loan repayments, dividend distributions, and capital injections into PT Asset Pacific, a company engaged in property development (Antara, 2022).

In addition, following the corruption case involving PT Asabri (Persero) committed by suspect Benny Tjokro Saputro, the Attorney General's Office confiscated hotel business properties located in Yogyakarta (Medistiara, 2023). Benny Tjokro managed PT Asabri (Persero) funds, one of which was by investing a portion of the funds into his own company, PT Hanson International Tbk. The Director of Accounting of PT Hanson International Tbk disclosed that Benny Tjokro injected funds into the company, which were subsequently used as capital for land acquisition (Saubani, 2023).

Given the need for the involvement of public accountants in efforts to combat money laundering (TPPU), parent companies often use shell companies or special purpose vehicles (SPVs) to conceal illegal funds. Public accountants have the opportunity to identify the beneficial owner of companies involved, as such entities are often shell companies. Based on the discussion above, corruption and money laundering remain difficult to control and have been categorized as extraordinary crimes (Sitompul et al., 2021). The complex nature of money laundering poses significant challenges for law enforcement agencies and authorities in prosecuting perpetrators of money laundering (Zolkaflil et al., 2021). Therefore, enhanced supervision by competent authorities is required.

The Financial Action Task Force (FATF) is an intergovernmental body responsible for developing international standards and global guidelines to prevent and combat money laundering through anti-money laundering (AML) and anti-terrorist financing (ATF) policies (FATF, 2023). This organization issues rules and standards that must be adopted by member countries to ensure effectiveness in preventing such practices (FATF, 2023). Currently, Indonesia is the only G-20 country that has not yet become a full member of the FATF and still holds observer status (Limanseto, 2023).

In order to fulfill the assessment requirements for full FATF membership, Indonesia continues to strengthen its supervisory framework by involving supervisory and regulatory bodies, law enforcement agencies, and all relevant ministries and institutions through the Financial Transaction Reports and Analysis Center (PPATK) (Saputra, 2023). PPATK is an institution tasked with collecting, analyzing, and reporting information related to suspicious or unusual financial transactions. This is stipulated in Article 1 of Government Regulation No. 43 of 2015, which states that PPATK is an independent institution established to prevent and combat money laundering (Government of the Republic of Indonesia, 2015). Article 3 specifies that public accountants are included as reporting entities, while Article 4 requires reporting entities to implement the Know Your Customer (KYC) Principle, referred to as the Principle of Recognizing Service Users (PMPJ).

In relation to this, the Minister of Finance issued Regulation of the Minister of Finance (PMK) No. 55/PMK.01/2017, which was subsequently refined through PMK No. 155/PMK.01/2017, along with other guidelines to assist in understanding and implementing PMPJ, namely Circular Letter of the Head of PPPK No. 7/PPPK/2019. The Center for Financial Profession Development (PPPK), under the Ministry of Finance, acts as a regulator and is responsible for conducting inspections to assess public accountants' compliance with standards, codes of ethics, and regulations. PPPK also provides guidance and supervision over financial professions, including public accountants (Center for Financial Profession Development, 2022). Cooperation and collaboration with PPATK are carried out through preventive measures to combat money laundering crimes (Ministry of Finance, 2022).

Public accountants play a crucial role in supporting compliance with FATF regulations, as they are professionals who provide services or perform work on behalf of clients. Public accountants are vulnerable to being involved in illegal transactions (Lukito, 2019). This profession acts as a gatekeeper in preventing financial crimes. The implementation of PMPJ serves as an entry point in preventing and combating money laundering. Through PMPJ, public accountants can determine the risk profile of clients to be audited, which subsequently affects the audit procedures to be performed (Jeppesen, 2019). An understanding of the client's business processes and business risks can help develop strategies to mitigate such risks (de Smet & Mention, 2011). During audits, auditors have access to all client documents, enabling them to detect suspicious operations indicating potential money laundering (Amara et al., 2020).

Based on the general findings of inspections conducted in 2021 on 81 public accounting firms (KAPs) and 88 public accountants, 45% of KAPs had not yet established PMPJ policies and procedures. In addition, 55% of KAPs had not formulated policies and procedures in accordance with PMPJ implementation steps. Regarding implementation, 47% of KAPs had not conducted PMPJ monitoring, 43% had not provided PMPJ training or monitored employee profiles, and 10% had not implemented PMPJ at the engagement stage (PPPK Secretary General, Ministry of Finance, 2022b). Inspection findings in 2022 also revealed that with regard to PMPJ design, 96% of KAPs had implemented PMPJ but not in accordance with the guidelines, while 4% had not established any guidelines. In terms of implementation, 86% had implemented PMPJ but not in line with policies, and 14% had neither established procedures nor implemented PMPJ.

Despite regulations being enacted and mandatory, financial crimes involving this profession continue to occur. The Financial Services Authority (OJK) imposed administrative sanctions on Ms. Sherly Jokom, a partner at the Public Accounting Firm Purwantono, Sungkoro, and Surja (a member of Ernst & Young Global Limited), who audited the annual financial statements of PT Hanson, in the form of suspension of her Public Accountant Registration Certificate (STTD) for one year (Financial Services Authority, 2019). As a result of this action, the state suffered losses amounting to IDR 22.788 trillion (Natalia, 2021). Therefore, an analysis of implementation is necessary, as PMPJ principles have not yet been optimized (Lukito, 2019). PPATK's annual report indicates that the highest-ranked money laundering crime in Indonesia involves the purchase of property assets (Lukito, 2019). These property assets can subsequently be utilized and operated as companies to conduct business activities. Money laundering through property purchases is relatively easy to carry out and can be executed by concealing identities through third parties and shell companies (Linkurious, 2022).

Based on geographic risk, public accounting firms in Yogyakarta fall within regions categorized as having a low level of money laundering risk (PPPK Secretary General, Ministry of Finance, 2022a). However, a researcher from the Anti-Corruption Studies Center (Pukat) at Gadjah Mada University, Zaenur Rohman, stated that money laundering through property asset purchases in Yogyakarta is attractive to perpetrators due to rapidly increasing property values (Suryani, 2023). Yogyakarta experienced the fastest property price increase of 8.6% year-on-year (Fauzian, 2020). Furthermore, data from the Central Statistics Agency (BPS) show that only 54.25% of Yogyakarta residents occupy privately owned homes, while the remainder are owned by investors (Merdeka, 2023). This increase is driven by Yogyakarta's appeal as a tourism and education destination, resulting in high demand for land as property investment due to tourism growth and the presence of numerous educational institutions, which in turn pushes prices upward (Prime360, 2023).

The potential for Yogyakarta to become a location for concealing illicit funds indicates the importance of the role of public accountants in the region in detecting money laundering activities. Research conducted by Adi (2017) on public accounting firms in Yogyakarta found that some firms had not yet implemented PMPJ provisions. Based on the background described above, evaluating the role of public accountants in implementing the principle of recognizing service users is essential in efforts to detect money laundering. Through a thorough understanding of who the service users of public accountants are—including companies, nonprofit organizations, government entities, and individuals—public accountants can identify potential risks associated with money laundering. In this context, public accountants serve as parties that help prevent and detect suspicious activities. This study seeks to underscore the importance of the role of public accountants in implementing PMPJ policies as part of broader efforts to safeguard the integrity of the financial system.

LITERATURE REVIEW

The Role of Public Accountants

Public accountants, or external auditors, conduct examinations of the fairness of a company's financial statements and are responsible for the audit opinions they issue. Financial statements must be audited to ensure that they are presented accurately, transparently, accountably, and in accordance with applicable accounting standards. According to Petrascua and Tieanub (2014) as cited in Cindori and Petrović (2017), public accountants play an important role because they are able to prevent and detect money laundering scenarios that may occur in the activities and financial transactions of business entities. The specific nature and scope of audit work enable public accountants to access comprehensive and detailed information on a company's operational activities derived from individual transactions within the business entity, making the audit process an effective means of detecting suspicious transactions (Cindori & Petrović, 2017).

Principle of Recognizing Service Users

The Principle of Recognizing Service Users (PMPJ), according to the Indonesian Institute of Certified Public Accountants (IAPI), is a policy implemented by public accountants to identify the profile, characteristics, and transaction patterns of clients, which at a minimum include client identification, client verification, and monitoring of client transactions (Susiani et al., 2020). Know Your Customer (KYC), or PMPJ, refers to the process of knowing and understanding clients, the business activities carried out by clients, the transactions conducted by clients, as well as clients' relationships with other clients, business partners, and employees as a whole (De Wit, 2007, as cited in Ahmad Tarmizi et al., 2023).

Audit Process

The audit process is a series of structured and systematic steps carried out by an independent auditor to examine, evaluate, and verify information in an entity's financial statements in order to ensure accuracy, compliance, or the effectiveness of internal controls (Tuanakotta, 2013). Based on the Public Accountant Professional Standards (SPAP), the audit process includes audit planning, audit execution (including internal control testing and substantive testing), evaluation of findings, formulation of audit opinions, and reporting of audit results. This systematic and independent process is conducted to evaluate an entity's financial or operational information in order to provide relevant opinions or reports to interested parties.

METHODOLOGY

This study employs a qualitative descriptive research design. Qualitative research tends to focus on an in-depth understanding of the case being examined (Yin, 2018). The researcher aims to provide a comprehensive explanation of the phenomenon under study in order to gain specific insights into a particular situation (Bell et al., 2019). This study seeks to obtain an in-depth understanding of the implementation of the Principle of Recognizing Service Users (PMPJ) by public accountants in Public Accounting Firms (Kantor Akuntan Publik/KAP). A case study method is used to analyze the conformity of PMPJ implementation by public accountants as well as the compliance of public accounting firms with PMPJ regulations.

RESEARCH FINDINGS

Primary Data

Data collection in this study was conducted through in-depth interviews. The sampling method used to determine informants was non-probability sampling, specifically convenience sampling. Convenience sampling was chosen due to the researcher's limited access in selecting research participants. Primary data were obtained through semi-structured interviews with partners, managers, senior auditors, and junior auditors. The interviews were conducted face-to-face at each respective public accounting firm.

The researcher targeted public accounting firms located in the Yogyakarta region that had implemented and possessed internal PMPJ guideline designs. However, due to constraints related to approval and access from the firms, the researcher was only able to reach four public accounting firms out of the total sixteen firms operating in Yogyakarta. Table 1 shows that the number of participants in this study was seven, consisting of four public accountant partners, one manager, one senior auditor, and one junior auditor.

This study achieved data saturation, as sufficient data had been collected and the variation in the data had reached an adequate level. Furthermore, no new significant information or themes emerged from the collected data. To achieve data saturation, the researcher employed additional methods, namely source triangulation, technique triangulation, and member checking.

Table 1. List of Participants

No.	Position	Code	Interview Date	Interview Duration
1	Partner	AP-1	Tuesday, 28 November 2023	48 minutes 52 seconds
2	Partner	AP-2	Wednesday, 29 November 2023	16 minutes 29 seconds
3	Partner	AP-3	Tuesday, 12 December 2023	53 minutes 14 seconds
4	Partner	AP-4	Wednesday, 20 December 2023	47 minutes 11 seconds

No.	Position	Code	Interview Date	Interview Duration
5	Manager	MA	Wednesday, 20 December 2023	29 minutes 9 seconds
6	Senior Auditor	SA	Wednesday, 29 November 2023	11 minutes 52 seconds
7	Junior Auditor	JA	Tuesday, 28 November 2023	48 minutes 52 seconds

Interview documentation was carried out by audio recording and subsequently transcribing the recordings to document the interview results, thereby facilitating the researcher's understanding of the information provided by the participants.

Secondary Data

Secondary data were obtained through document analysis techniques. Document review was required to assist the researcher in analyzing variations in the mechanisms for implementing the Principle of Recognizing Service Users (PMPJ) by public accounting firms. The documents used in this study include:

1. Regulation of the Minister of Finance (PMK) No. 55/PMK.01/2017;
2. PMK No. 155/PMK.01/2017;
3. Circular Letter No. 7/PPPK/2019;
4. Sectoral Risk Assessment (SRA) for Accountants;
5. Internal Quality Control Standards of Public Accounting Firms;
6. Internal PMPJ Design of Public Accounting Firms.

Data Analysis

The data analysis process was conducted by examining the implementation of PMPJ in the form of internal designs adopted by each public accounting firm. In the data analysis, the researcher used primary data derived from interview transcripts and secondary data obtained from supporting documents. Data analysis in this study refers to the internal PMPJ design as well as other policy documents governing PMPJ.

The researcher transcribed the interview recordings and analyzed internal documents regulating PMPJ. Subsequently, the interview transcript data were summarized by selecting information relevant to the research topic. The data were then coded and grouped into predetermined main thematic categories. The codes that had been developed and categorized according to themes were then presented in the form of thematic tables. Finally, the researcher interpreted and assigned meaning to the identified themes as the research findings.

Data Validation

Source triangulation, technique triangulation, and member checking were employed to ensure data credibility.

1. **Triangulation**
   The researcher ensured data validity by conducting source triangulation through verification of information obtained from different informants. In addition, technique triangulation was applied by using two approaches, namely document analysis and interviews.

2. **Member Checking**
   The researcher asked the informants to review the conformity and accuracy of the interview transcripts that had been prepared against the information they provided. This process aimed to ensure alignment between the transcripts and the informants' accounts. Member checking was conducted within less than ten days after the interviews and involved all informants.

DISCUSSION

This study aims to evaluate the role of public accountants in implementing the Principle of Recognizing Service Users (PMPJ) in detecting money laundering crimes. Public accountants are reporting entities required to apply PMPJ as part of efforts to prevent money laundering (TPPU). Therefore, in providing their services, public accountants must identify and understand the parties to whom they render services. This requirement is stipulated in Government Regulation No. 43 of 2015 concerning Reporting Entities in the Prevention and Eradication of Money Laundering Crimes. The Ministry of Finance, as the regulator of public accountants, issued Regulation of the Minister of Finance (PMK) No. 55/PMK.01/2017 and its amendment, PMK No. 155/PMK.01/2017, as well as the implementation guideline in the form of Circular Letter No. 7/PPPK/2019.
However, based on PPPK findings from inspections of public accountants and public accounting firms that served as samples, there are still public accountants and firms that have been sanctioned due to non-compliance in implementing PMPJ. Yogyakarta is one of the regions used by money laundering perpetrators to store proceeds of crime through the purchase of property assets, as the region has strong potential for rapid property value growth. The purchase of property assets is the most common method used by money launderers to conceal their assets. Public accounting firms in Yogyakarta that were included as research samples have implemented PMPJ in accordance with the guidelines set out in Circular Letter No. 7/PPPK/2019.

Regarding variations in the mechanisms for implementing PMPJ, public accounting firms in Yogyakarta have incorporated internal PMPJ provisions into their internal quality control systems and have also developed separate policies. Employee recruitment procedures include monitoring employee profiles. Continuous competency development is carried out through training, both those organized by the Indonesian Institute of Certified Public Accountants (IAPI) in the form of Continuing Professional Education (PPL) and internal socialization programs. The scope of services is mapped across all clients involved in engagements. Communication is conducted by informing clients that a consent form must be signed as a prerequisite for PMPJ examination, and auditors will proceed with the engagement only after such consent has been obtained. Risk assessment is conducted by referring to the Sectoral Risk Assessment (SRA) issued by PPPK.

The PMPJ implementation procedures consist of three stages: identification, verification, and transaction monitoring. Identification is carried out by requesting information and identity documents. Verification involves requesting documents, searching for information, matching documents, and reviewing documentation. Transaction monitoring that requires special attention includes transactions related to sources of funds, capital injections, high-value accounts, purchases, and transactions with related parties.

PMPJ documentation is integrated into the audit documentation maintained by public accounting firms. Any identified findings are reported through PPATK's goAML application. Sanctions for non-compliance by public accountants range from administrative sanctions to suspension of practice licenses. Compliance theory explains this as a reflection of the moral dimension of public accountants' professional conduct in adhering to regulations due to pressure to comply with established rules. This is evidenced by public accounting firms in Yogyakarta that have implemented PMPJ in accordance with the guidelines set out in Circular Letter No. 7/PPPK/2019.

Auditors play a significant role in implementing PMPJ due to their access to internal information that is not available to all parties. Follow-up collaborative efforts with PPATK help the government detect indications of money laundering. Mandatory audits require clients to engage public accountants to examine their financial statements, which also reflects professional integrity and moral responsibility in complying with regulations.

Despite the important role of public accountants in implementing PMPJ, there are still obstacles and challenges, including client complexity and geographic scope, limited diversity of services provided, lack of detection tools to access fund flows, and overlapping roles. Regarding the assurance of client data confidentiality, matters related to company establishment, property purchases, bank account opening, or asset management that may be misused for money laundering purposes fall outside the authority of public accountants. These responsibilities are instead carried out by other professions, such as notaries and financial institutions, which already have their own anti–money laundering and counter–terrorism financing (AML–CFT/APU-PPT) policies in place.

CONCLUSIONS AND RECOMMENDATIONS

Informants from four public accounting firms (KAPs) in the Yogyakarta region have implemented the Principle of Recognizing Service Users (PMPJ) in accordance with the applicable regulatory guidelines, namely Circular Letter No. 7/PPPK/2019. This is evidenced by the fulfillment of the mandatory implementation steps, including the establishment of internal guidelines and the completeness of implementation procedures. These implementation steps comprise mapping the scope of services, communication with service users, analysis of service user risk, implementation procedures, documentation and record-keeping systems, as well as reporting.

The role of public accountants in detecting potential money laundering remains essential, as public accountants have access to companies' internal information and serve as part of follow-up collaborative efforts with the Financial Transaction Reports and Analysis Center (PPATK) to assist the government in combating money laundering crimes (TPPU). Audits of financial statements are also a mandatory requirement for companies. Moreover, this role reflects the professionalism of public accountants in upholding professional principles, particularly integrity and compliance with regulations.

However, the implementation of PMPJ policies still requires further evaluation. Merely fulfilling the obligation to apply PMPJ procedures is not sufficient to reduce the potential for money laundering. In carrying out their role, public accountants continue to face obstacles and challenges, particularly in the Yogyakarta region, in achieving effective PMPJ implementation. These challenges include client complexity and geographic scope—characterized by small-scale companies and limited service diversity that is largely confined to financial statement audits—limited detection tools and restricted access to information, protective behavior by service users who opt for private companies without mandatory audit requirements, overlapping professional roles, reputational risks faced by public accountants, and the limited scope of audit work performed.

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