

ANALYSIS OF CROSS-BORDER CASH-CARRYING (CBCC) THREAT COUNTERMEASURES FROM A CUSTOMS AND STRATEGIC INTELLIGENCE PERSPECTIVE

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Abstract: This research departs from the problem of potential losses in Indonesia stemming from the actions of Cross Border Cash Carrying (CBCC). In 2018 it was estimated that there were 12 trillion rupiah suspected of entering Indonesia unreported and suspected to be a criminal practice of money laundering (TPPU) and financing of terrorism activities. To that end, this article aims to provide an overview of how CBCC threat countermeasures from a strategic customs and intelligence perspective. Using a qualitative approach, this article analyzes the problem using descriptive methods. The data sources used are secondary data derived from open sources such as news articles, academic research journals and institutional documents related to the problem under study. The results showed that the CBCC threat in addition to having an impact on economic aspects is also strongly related to the threat of other transnational crimes such as narcotics trafficking and terrorism financing. Therefore, this CBCC threat cannot be underestimated and must get an appropriate approach to overcome it. From a customs and strategic intelligence standpoint, surveillance of CBCC practices requires a wealth of data from multiple points of view to provide comprehensive mapping of the problem. In addition, appropriate intelligence data exchange media is needed so as to enable every surveillance agency, especially the DGCA, to have easy access to any data needed for surveillance and enforcement. In addition, regulatory improvements and strengthening the legal foundation continue to be pursued to support the effectiveness of enforcement in the field.

Keywords: Cross Border Cash Carrying; Intelijen Strategic; Customs; Money Loundering.

INTRODUCTION

Cross-border cash carrying or what is known as Cross Border Cash Carrying (CBCC) or some call it cash smuggling is one of the major threats that must always be watched out for in border surveillance activities. Like the threat of transnational organized crime (TNOG) such as narcotics, and smuggling of dangerous goods and people, CBCC also has a great impact on national resilience because CBCC's activities are said to be related to money laundering and terrorism financing modes. This was conveyed by the Minister of Home Affairs (Mendagri) Tito Karnavian who said that carrying cash and cross-border cash courier instruments in and out of Indonesia could be one of the modes of money laundering (TPPU) and terrorism financing (Farisa, 2022).

The threat of CBCC is certainly very large, in addition to its relation to TPPU activities and terrorism, this CBCC is also very risky to harm state finances because of the large amount of money circulating through this illicit activity. The Center for Financial Transaction Reporting and Analysis (PPATK), provides estimates of hundreds of trillions of those entering the jurisdiction of Indonesia that are not reported by related parties. Furthermore, PPATK said that the average value in 2018 was around Rp 12 trillion, and in 2019 around Rp 3 trillion entered Indonesia without being reported. Furthermore, the Head of PPATK Ivan Yustiavandana (2012) also mentioned that there were indications of CBCC practices because a CBCC case was found by someone who reported carrying cash 4 times but based on Passenger Risk

Management (PRM) data, the person had it 154 times (KumparanBisnis, 2022).

CBCC's activities are brought to the attention of relevant institutions and bodies in Indonesia by making various efforts to narrow the space for CBCC actors. This is certainly very important because of its huge impact on Indonesia. As previously stated, CBCC can be part of TPPU and terrorism activities, so CBCC can be part of organized crime such as the crime of smuggling dangerous goods. For this reason, this paper wants to focus on discussing the following things: First, how the CBCC threat has been found on the Indonesian border. And second, how the strategic intelligence approach monitors CBCC threats more effectively and efficiently along with efforts to narrow the space for CBCC actors in terms of regulatory change & strengthening.

THEORETICAL REVIEW

Cross Border Cash Carrying (CBCC)

Based on the Regulation of the Minister of Finance (PMK) of the Republic of Indonesia Number 100 / PMK.04 / 2018 Cross Border Cash Carrying (CBCC) or carrying cash and/or other payment instruments or also often mentioned as cash smuggling is an action that is in conflict with the state's efforts to achieve and maintain the stability of the rupiah value through monetary control over the traffic of carrying foreign banknotes into and out of the Indonesian customs area (Ministry of Finance, 2018).

Meanwhile, the NRA Indonesia report (2015) it is stated that cross-border carrying

of money has an upper limit on the amount allowed to be carried. However, even though there is a provision for the maximum value of money that must be reported to customs officers through the CBCC report, in practice, there are still loopholes where the carrying of the cash involves different people and the value carried does not reach the maximum limit that must be reported coupled with the possibility of entry of terrorist members without going through official channels.

Money Laundering Act (TPPU)

According to the Law of the Republic of Indonesia Number 8 of 2010 concerning the Prevention and Eradication of Money Laundering Crimes, money laundering crimes are defined as any act that meets the elements of a criminal act involving financial transactions mentioned in accordance with the provisions in the applicable Law. It is further stated that the perpetrator of this criminal act is any Person who places, transfers, transfers spend, pays, gives, entrusts, carries abroad, changes the form, exchanges for currency or securities or other acts of Wealth that he knows or reasonably suspects is the result of a criminal act with the aim of concealing or disguising the origin of the Wealth. (Berutu, 2019)

Strategic Intelligence

Citing McDowell's (2009) statement that strategic intelligence analysis can be considered a special form of research that addresses any problem at a broad and detailed level to be able to describe threats, risks, and opportunities that can be utilized so that it is helpful to determine the right programs and policies in solving problems. Further experts on strategic intelligence

argue that strategic intelligence and its analytical practices focus on the ability to creatively think about one's way through problems at the macro level while maintaining a pragmatic relationship with inevitable tactical and operational impacts and outcomes (McDowell, 2009; Prunckun, 2010).

MATERIALS AND METHODS

This research is qualitative descriptive research by analyzing the phenomenon of Cross Border Cash Carrying (CBCC) threats to the resilience of the Indonesian state. The data collection technique used is a literature study method or documentation study sourced from scientific review literature such as journals, research related to theses/dissertations, and documents of related institutions/agencies/institutions such as djbc and the Indonesian Ministry of Finance. The analysis carried out is a descriptive analysis by describing/describing a series of facts and events related to the observed problem.

RESULTS AND DISCUSSION

The Threat of Cross-Border Cash Carrying (CBCC) on the Indonesian Border

As previously stated, Cross Border Cash Carrying (CBCC) or cash smuggling activities are called by Home Minister Tito Karnavian as a big threat because it can be one of the modes of money laundering (TPPU) and terrorism financing that will risk national economic resilience and security. Generally, threats that include CBCC activities are related to transnational organized crime (TNOG) threats such as

money laundering from narcotics activities and other prohibited goods, financing various acts of terrorism, and attempts to disguise special transactions for the purpose of evading certain fees or levies from a country.

First, CBCC as an effort to launder money from illicit activities (such as narcotics) is considered the main threat that can harm Indonesia's economy and national security. CBCC or cash smuggling violation activities have long been referred to as rationing efforts that are strongly associated with drug dealers. According to research conducted by Almanzar (2013) cash smuggling of crime cases from Mexico, a large group of TNOCC perpetrators carries out drug trafficking in the United States that generates billions of dollars in revenue annually. The money generated is known to be transferred by the CBCC method. The perpetrators of narcotics trafficking and CBCC are also inseparable from groups involved in a wide and diverse criminal activity as their main business practice. Their crimes are indicated across territories that cover more than one national and economic border.

The numbers are no joke, in the case of Mexico in 2003, it was estimated that the global drug trade generated about \$321.6 billion. This amount of money led these crime groups to raise their illicit funds and "launder" them in such a way as to make their business continue to run well. Interestingly, rather than structuring and injecting their funds into the financial system of the United States, this group prefers to clean up their money in Mexico and other countries. This is because the U.S. has stepped up surveillance since the first

money laundering law was enacted. So CBCC by bringing money in the form of cash through the border is their effort to be able to launder their money in other countries. (Almanzar, 2013)

Based on a report by the US National Drug Intelligence Center, it is estimated that criminals or TNOCC perpetrators of these narcotics smuggle \$18 billion to \$39 billion a year in large amounts of cash across the border in the Southwest region. The impact is that whenever large remittances, stemming from criminal activity cross successfully across the U.S. Southwest border, the U.S. government and economy are said to have failed to generate hidden revenues from the confiscation of the proceeds of these crimes and it is even thought to be helping to perpetuate the efforts of the criminals who generated the funds. (Almanzar, 2013)

So it can be said that CBCC or the indication of cash smuggling, which is estimated at trillions of rupiah entering Indonesian territory, cannot be simply released from other dangers such as narcotics trafficking. This indication is getting stronger because the activity of circulating or buying and selling narcotics is called Almanzar, (2013) as a cash business, where goods of high value, are produced by several large suppliers, and sold by countless small business people and spread over a very large area in exchange or exchange of cash.

Second, CBCC is a media perpetrator of TNOCC in financing crimes such as terrorism. Based on The Minister of Home Affairs Tito Karnavian, CBCC can be indicated as an effort made by criminals to fund acts of terrorism in Indonesia. This statement

certainly has strong reasons, one of which is based on the National Risk Assessment /NRA (2015) the way of transferring terrorist funds through the carrying of cash both domestically and across national borders (cash smuggling) is a high-risk way of transferring funds for the financing of terrorism. Although this CBCC method for funding something that has a large cost has disadvantages in terms of limited amounts of money that can be moved, relatively large costs, and a relatively long transfer time, the CBCC for terrorism financing has the advantage of being difficult to trace the flow of funds both the origin of funds and the purpose of the flow of funds.

It is because of the difficulty of tracing the origin of these funds that perpetrators of acts of terrorism rely heavily on the CBCC fund flow method to fund their activities. Furthermore, the NRA (2015) cited one of the reasons for the difficulty of tracing the flow of money for the financing of terrorism because of the transfer of funds in cash using couriers or different people both for carrying within the country and across national borders with a certain face value. For cross-border carrying of money, although there is a provision for the maximum value of money that must be reported to border officers through the cross border cash-carrying (CBCC) report, in practice there is still a gap where the carrying of cash involves different people and the value carried does not reach the maximum limit that must be reported plus there is a possibility of entry of terrorist members without going through official channels.

For this reason, the way of transferring terrorism funds through the carrying of

cash or similar instruments (cash smuggling) both within Indonesia and across national borders is classified as high risk. Thus, FATF number 32 regarding the carrying of cash (cash couriers) emphasizes that every country must ensure that border authorities or customs officers have the authority to stop/withhold money or similar instruments that are suspected to be related to the financing of terrorism, money laundering or other criminal acts or that are reported incorrectly. Furthermore, the NRA (2015) also mentioned that one of the real examples of CBCC's connection to terrorism occurred in 2008, when a non-Indonesian national was arrested for carrying cash many times where once in Indonesia carrying cash with a value of at least 30,000 USD in US dollar denominations and was known to have meetings with parties affiliated with acts of terrorism in Indonesia, one of which was suspected of being financing suicide bombings at JW Mariot Hotel Building and Ritz Calton Hotel in Mega Kuningan Jakarta in July 2009.

Third, CBCC is an effort by perpetrators to avoid reporting related to taxes or the like. Quoting Almanzar, (2013) the smuggling of large amounts of cash or CBCC is a growing problem with the economic security of even the United States. This can happen because this CBCC practice is an attempt made by the perpetrator to avoid the required reporting. Banyangkan indications of the influx of money into Indonesia, which is said to have the potential to reach 12 trillion in 2018 and 3 trillion in 2019, is the result of business by overseas Indonesian entrepreneurs who can be taxed a certain amount.

So the CBCC certainly has a

detrimental impact on the economy of any country if this practice is left without restrictions. So CBCC is essentially the threat of smuggling large amounts of money as a practice that has been adapted to circumvent a country's laws (such as reporting and imposition of certain levies), evading law enforcement (which seeks to avoid reporting the origin of the money, and the ongoing efforts made to fund illicit activities).

Strategic Intelligence Approach Oversight and Counteract Cross Border Cash Carrying (CBCC) Threats

These threats and risks that can be obtained by Indonesia are very vital to Indonesia's national security, therefore many relevant agencies or agencies have the authority and duty to limit the occurrence of such criminal practices. In Indonesia, financial transaction supervision is the authority of the Center for Financial Transaction Reporting and Analysis (PPATK) based on Law Number 8 of 2010 concerning the Prevention and Eradication of Money Laundering Crimes (TPPU). At the border, the customs function that supervises the entry/exit of large amounts of cash is certainly a task carried out by the Directorate General of Customs and Excise (DJBC), in addition, the licensing of carrying cash must also not be separated from supervision from Bank Indonesia (BI).

Since there is more than one agency conducting oversight in the threat of CBCC crimes, effective oversight must be carried out with synergy between these agencies/agencies. From a strategic intelligence standpoint, there are several key things that need to be done to improve the

effectiveness and efficiency of surveillance.

1. Analysis of intelligence data sourced from all agencies/ agencies.

Like other intelligence products, strategic intelligence efforts in tackling CBCC threats also rely heavily on a wealth of data that can be properly analyzed and interpreted to map everything related to threats. To quote McDowell, (2009) in a major cycle of the intelligence process, there are several stages that need to be considered and planned very well. Some of the stages mentioned: First, the task and focus of intelligence to be executed. Second, strategic research project planning. Third, collect data and information. The fourth is to compile and evaluate the data. The fifth conduct the appropriate analysis. The sixth develops specific concepts and hypothesis related to the observed problems, and the seventh prepares a report on the results of the strategic research.

All of these things are of course also done in other intelligence processes or stages, but basically, all these processes have the main difference when the context is strategic intelligence. The specific goal of strategic intelligence is to provide accurate long-term intelligence to enable effective high-level planning and management of law enforcement resources to meet the overall perceived threat. This is not just an activity directed directly at the tactical objectives of law

enforcement. The adaptation of the standard intelligence cycle, rather than a massive change, is necessary in the context of the prevention of problems in the realm of strategic intelligence (McDowell, 2009)

Returning to the context of the CBCC threat, the strategic intelligence process that is carried out depends largely on how the data obtained or owned by all agencies, can be the best input to provide a broad point of view for all parties involved. For this reason, in the context of the intelligence process that McDowell mentioned, in the context of this CBCC threat, it should go through the following process:

The first process, the task and focus of intelligence to be carried out and directly related to the second process of how to plan a strategic research project that should be promised. With regard to these two things, an institution that has a focus on handling CBCC should essentially have some focus organized in several layers of tasks and an observation focus. At the core of this observation layer, the focus should be on the search for strategic intelligence data and information related to the context of financial transaction supervision institutions and performance such as PPATK, BI, and DJBC. Meanwhile, the next layer of strategic intelligence focus relates to other agencies that have to do with financial transactions derived from CBCC actions such as narcotics trafficking from BNN, BIN, and

counterterrorism from BNPT.

Furthermore, the third process is related to how to collect data and information. The availability of information from each layer of such related institutions must be met. Each relevant agency should accommodate available intelligence data that can provide an in-depth and specific point of view according to their respective duties and functions. Furthermore, the data enters the fourth stage where the data is collected and compiled and then evaluated the data related to the quality and linkage of the desired context, so that it can be continued in the fifth process, namely conducting an analysis in accordance with the desired goals and expectations.

Sixth, from the in-depth data of each institution, the development of specific concepts and hypotheses related to the problem observed with a broad and complex point of view will be obtained. So that in the final result, this complete data and information will be a significant input in the report on the results of the strategic research.

In simple terms what is done can be described in the following simple scheme in figure 1. Based on figure 1, the first attempt that needs to be made is to get a broad point of view by working on all the data from many related usmbers. So that the evaluation of strategies and policies should be based on the results of the analysis of all these data. So that the handling and supervision of illegal CBCC practices can be

carried out more effectively and efficiently so as to minimize the risk of losses that can

be obtained by the Indonesian government.

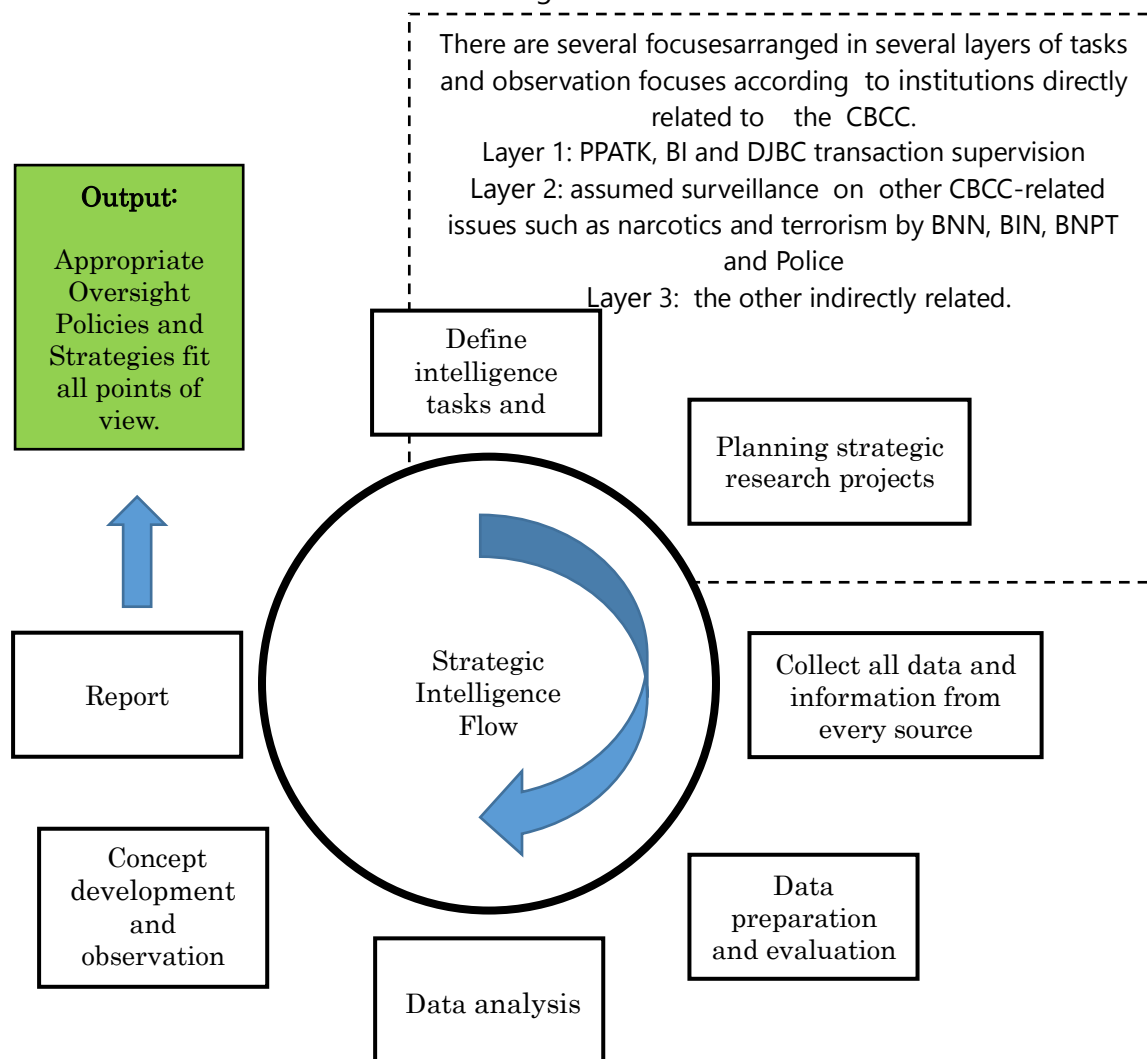


Figure 1. Intelligence Processes in the Context of CBCC Practice Oversight

2. Development of an integrated intelligence data exchange system.

The collection of data obtained from various data sources, of course, has not become the focus of solving problems in terms of customs and strategic intelligence. Effective and efficient enforcement will not be possible when the access of surveillance and enforcement implementers does not run smoothly on the intelligence data and information that has been collected, previous selection, and analysis. In

this regard, McDowell (2009) said that data needs are the main needs in taking action. It is further submitted that as far as requests for information input, the work of strategic intelligence relies heavily on the range of existing intelligence implementers and investigative data that may already be owned and used regularly in an organization. (McDowell, 2009) For this reason, synergy in data exchange is one of the other supporting factors that are very vital in supervision.

Based on the context of strategic intelligence, the concept of a fusion center is an attempt or answer to answer the synergy between agencies in the exchange of intelligence data. McDowell (2009) argues that data and information from these various sources, regardless of the purpose of their collection, will always be the main data bank for the commencement of strategic activities both at the strategic and operational levels. Especially for the DJBC which is a border guard agency and as an initial filter for the entry of crime threats into Indonesian territory, the availability of surveillance media in the context of intelligence such as fusion centers will certainly greatly help the surveillance of people passing through the Indonesian border.

Various experts mention that the concept of a fusion center is the best way to exchange intelligence information for many law enforcement agencies in an area. In their research, Carter & Carter, (2009) stated that the (Carter & Carter, 2009) fusion center method of sharing information makes the intelligence environment of the community in a country facilitated in terms of performance in detecting the occurrence of terrorist activities. Therefore, in addition to good detection of terrorism, the fusion center is also an effort to make it easier for an agency related to CBCC violations to obtain important

information that Perhaps only other institutions that have different authorities can be provided.

In addition, a fusion center concept is increasingly needed because as PPTAK knows in its report, it states that the disclosure of CBCC violation actions, one of which is helped by re-checking the system. passenger risk management (PRM) which is a system by applying the concept of providing data that can be used in observing someone who is suspected of committing certain violations. This PRM for Customs agencies is very vital in analyzing the movement of people in and out of the Indonesian border. So that this PRM can be the basis of the concept of a fusion center system that combines other data from other institutions.

Based on the intelligence process in the context of previous CBCC surveillance, at least three main agencies and several other relevant agencies were found that needed synergy in supervising and cracking down on any CBCC violations. Therefore, an appropriate mechanism is needed in the development of a fusion center so that it accommodates all parties who need intelligence data to carry out their duties and functions.

Before describing the concept of data exchange between agencies that can be used, here are some institutions or bodies that may be related to CBCC practices or TPPU practices. Based on the 2021 TPPU

risk assessment team report, there are at least nine supervisory or regulatory institutions involved, such as the Financial Services Authority, Bank Indonesia, the Ministry of Cooperatives and Small and Medium Enterprises, Commodity Futures Trading Supervisory Agency, Directorate General of State Assets, Ministry of Finance, Directorate General of General Legal Administration, Ministry of Law and Human Rights, Ministry of Agrarian and Spatial Planning, National Land Agency, Center for Financial Professional Development, Ministry of Finance, and Center for Transaction Reporting and Analysis Finance. In

addition, there are eight law enforcement agencies, namely the National Police of the Republic of Indonesia, the Attorney General's Office of the Republic of Indonesia, the Corruption Eradication Commission (KPK), the National Narcotics Agency (BNN), the Directorate General of Customs and Excise, the Directorate General of Taxes, Civil Service Investigator (PPNS) and Judge.

Of the many agencies, for this case of CBCC supervision, in simple terms the fusion center arrangements obtained can be designed as follows:

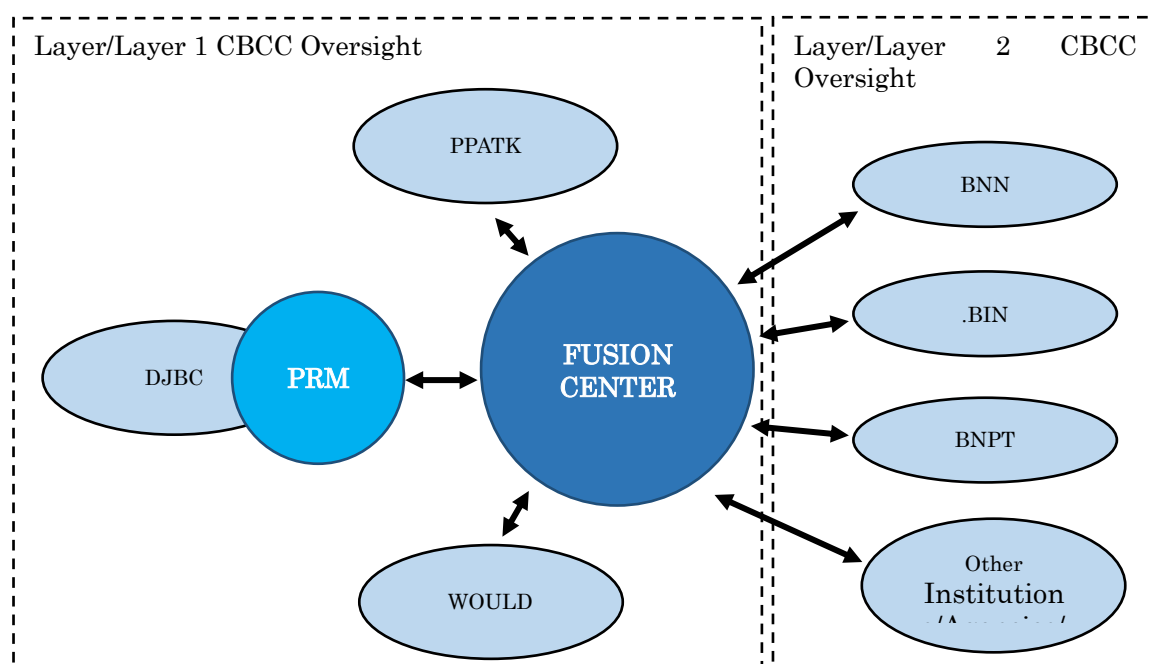


Figure 2. Simple Concept of CBCC Practice Integrated Surveillance Fusion Center

3. Narrowing the cash courier cross-border space with regulatory changes & strengthenings.

In addition to surveillance efforts or actions by strengthening aspects of strategic intelligence,

strengthening and changing regulations through legislation is also necessary for better prevention of CBCC violations. This is an effort that needs to be done because in general perpetrators take advantage of

loopholes in regulations that make their actions in a "gray" position in the eyes law. In various countries, efforts are made by tightening rules related to cash, including in Indonesia. Citing research from Ayu (2018) In terms of law enforcement, in order to prevent money laundering, if no one reports, PPATK and Customs have the authority to refuse the carrying of Rp 100,000,000.00 as well as Bank Indonesia does not allow the carrying of cash.

Furthermore, in every violation, the responsibility for cash-bearers who violate reporting obligations should provide a 10% fine with a maximum limit of IDR 300,000,000.00 as compliance with the prohibition on violators and avoid confusion in the implementation of the provisions for carrying cash so that the means are very effective against the provisions of the carrying obligation Cash.

In addition, from efforts to change regulations, the Ministry of Finance issued a Regulation of the Minister of Finance concerning Amendments to the Minister of Finance Regulation Number 157 / PMK.04 / 2017 concerning procedures for notification and supervision, suspicious indicators, carrying cash money and/or other payment instruments, as well as the imposition of sanksi administrative and solicitation to the state treasury to reduce loopholes in previous regulations that CBCC criminals could exploit. The changes to the regulations contained in PMK Number 100 / PMK.04 / 2018 are aimed at achieving and maintaining the stability of

the rupiah value through monetary control over the traffic carrying foreign banknotes into and out of the Indonesian customs area. This is also based on the amendment of Bank Indonesia Regulation Number 19/7/PBI/ 2017 concerning the Carrying of Foreign Banknotes into and out of the Indonesian Customs Area as amended by Bank Indonesia Regulation Number 20/ 2/ PBI/ 2018 concerning Amendments to Bank Indonesia Regulation Number 19/7/PBI/ 2017 concerning the Carrying of Foreign Banknotes into and out of the Indonesian Customs Area

CONCLUSIONS

Based on the results of the previous data analysis, it can be concluded that the supervision and countermeasures of CBCC activities obtained the following conclusions. First, the CBCC threat certainly cannot be regarded as a simple threat which is interpreted as an act of carrying money into Indonesia beyond the limit or the amount set. Furthermore, the practice of CBCC violations has a threat with more complex risks, namely in addition to impacting the economic aspects of CBCC violations are strongly related to the threat of other transnational crimes such as narcotics trafficking and terrorism financing. Perpetrators of narcotics trafficking generally use the CBCC violation method or carry out cash smuggling to launder their money outside their territory of circulating narcotics. Meanwhile, perpetrators of acts of terrorism like this method because of the difficulty of the relevant authorities in tracing the flow of

funds. So that CBCC violations or cash smuggling are the main threats to Indonesia's customs and economic system which risks disrupting Indonesia's national security and resilience.

Secondly viewed from a customs and strategic intelligence standpoint, surveillance of CBCC practices requires a wealth of data from multiple points of view to provide a more comprehensive mapping of the problem. In addition, appropriate intelligence data exchange media is needed so as to enable every surveillance agency, especially the DGCA, to have easy access to any data needed for surveillance and enforcement. Not to forget from the point of view of law enforcement, regulatory improvements and strengthening the legal basis continue to be sought to support the effectiveness of enforcement in the field and narrow the movement or mode that can be used by perpetrators or cash couriers.

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