An Analysis of the “Follow The Money”: Investigative Audit Technique in Campaign Funds for the Election of Regional Heads in Indonesia

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ABSTRACT

The practice of campaign funds monitoring that is limited to compliance with laws and regulations by submitting reports and audits is still considered insufficient in an effort to realize a clean election and support the implementation of good governance. This research aimed to find out information related to compliance with campaign funds for 2020 Regional Head Elections through the follow the money investigative audit technique in accordance with regulatory provisions as an evaluation of the implementation of the 2020 Regional Head Elections in terms of campaign funds. This research was conducted in the Indonesian Financial Transaction Reports and Analysis Centre (PPATK) as Financial Intelligence Unit using a qualitative method with case studies and descriptive analysis. Based on the results of the analysis and other information owned by PPATK, there were indications of violations of campaign funds regulation as stated in the National Election Commission Regulations Number 12 of 2020 and indication of money politics practice.

Keywords: campaign funds, PPATK, investigative audit, follow the money

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INTRODUCTION

In the life of a democratic country, the election is one of the symbols of sovereignty and people power. Elections are held regularly as a routine agenda in order to ensure the means of public supervision of their representatives who occupy executive and legislative positions.

The campaign is a medium to attract attention, sympathy, as well as a place to convince voters in the political agenda of the election. As for voters, the campaign helps to identify their candidates who deserve to be elected through the delivery of the vision, mission and political promises of the participants. One of the guarantees for an election process with integrity and independence is the absence of interference from any party, including in terms of campaign funds. Therefore, cooperation and public involvement in monitoring campaign funds is a must in realizing an election with integrity, transparency, and accountability.

It is undeniable that elections can cost quite a lot of money from both the organizers and participants’ point of view, including the implementation of regional elections. Provisions related to election campaign funds are specifically regulated in the Regulation of the National Election Commission of the Republic of Indonesia (PKPU) Number 12 of 2020 concerning Amendments to PKPU Number 5 of 2017 concerning Campaign Funds for Participants in the Election of Governors and Deputy Governors, Regents and Deputy Regents, and/or Mayors and Vice Mayor. The existence of these regulations serves as a guideline for managing campaign funds which includes limits on campaign funds, recording of campaign fund receipts and expenditures, submission of campaign finance reports, auditing campaign finance reports, as well as provisions for sanctions for violations of campaign finance reporting policies.

Campaign funds refer to all funds received and issued in the context of campaigning for candidates and political parties (Prasetyo, 2019). Campaign Finance Disclosure or disclosure of campaign funds is an important part of electoral competition as a form of democratization of administration of the election. Disclosure of campaign funds is the dissemination of information about campaign contributions and election costs (Union of Columbia Municipalities, 2010).
As part of monitoring campaign funds, election participants must prepare a Special Campaign Funds Account (RKDK) which accommodates campaign funds receipts in the form of money, which is separated from the accounts of election participants and is only used for campaign needs. The audit of the campaign finance report will then be carried out by an independent Public Accounting Firm (KAP). The public can participate in monitoring the participant’s campaign finance reports through the KPU website and can report findings if there are indications of violations in the field.

Referring to the results of the audit of the 2020 regional election campaign funds reports, 273 out of 739 (37 percent) of regional head candidate pairs were declared non-compliant or only 446 candidate pairs (63 percent) met the compliant category. In detail, as many as 7 candidate pairs did not comply and 18 candidate pairs were declared compliant at the level of the governor and deputy governor election. Meanwhile, in the regent level elections, 227 candidates did not comply and 386 candidates were declared compliant. As for the election at the mayor level, 62 candidates (61 percent) of the audit results complied and 39 candidates (39 percent) who were declared non-compliant.

Various things are suspected to be the cause of the non-compliance of the candidates’ campaign fund reports, including the non-placement of donations in the form of cash in RKDK. In addition, the factor is the incomplete proof of expenditure transactions and donation receipt transaction data, as well as the submission of the initial campaign fund report (LADK), campaign fund donation receipt report (LPDK), and campaign fund receipt and expenditure report (LPPDK) exceeding the specified time limit. However, the provision of administrative and criminal sanctions for violations of provisions has not been firmly enforced in accordance with applicable regulations.

The audit of campaign funds by public accountants (KAP) is still limited to compliance which only assesses the suitability of campaign funds reporting with campaign funds laws and regulations. Campaign fund audits are neither investigative nor comprehensive. Auditors have no obligation to investigate and ensure campaign funds transactions are in accordance with activities that occur during the campaign period. They cannot provide
a complete and adequate picture of the reality of campaign funds receipts and expenditures (Prasetyo, 2019).

On Tuesday, August 18, 2020, the National Elections Commission (KPU), the National Elections Supervisory Agency (Bawaslu), and The Indonesian Financial Transaction Reports and Analysis Centre (PPATK) agreed to strengthen commitments in monitoring campaign funds, especially in 2020 regional election. The cooperation between KPU, Bawaslu, and the PPATK resulted in an agreement in monitoring campaign funds as well as a follow-up to the imposition of sanctions for the violation. In addition, the agreement was also intended to prevent the entry of illegal flows of funds in the 2020 regional election, including taking action against all money politics practices.

As a Financial Intelligence Unit (FIU), the PPATK has the duty and authority to combating money laundering and terrorism financing. In carrying out its duties, the PPATK receives financial transaction reports, analyze financial transaction reports, and forward the results of the analysis to law enforcement agencies. The approach to trace the flow of funds or assets as a result from crime (follow the money) is a step used by the PPATK to maintain financial system stability, conduct searches and efforts to recover assets, and combat criminal acts with economic motives. Follow the money literally means “following the traces left in a flow of money or flow of funds”. This trail will lead investigators or forensic accountants to the perpetrators of fraud (Tuanakotta, 2010:373).

The follow the money approach prioritizes finding money or assets resulting from criminal acts compared to looking for criminals. After the results are obtained, then a search is carried out on the perpetrators and the crimes committed (Sutrisni & Sukranata, 2013).

One of the goals of a follow the money investigative audit is to find embezzled assets and recover from losses incurred. The process of following the money examination or investigation of a case, can be done with various evidence techniques, one of which is following money by understanding the perpetrator instinctively, tracing the source and purpose of continuing the crime by following the flow of funds, the perpetrator’s wealth, data mining, and utilize various other sources.
As for the stages in case disclosure, forensic accountants can do predication, formulate hypotheses, data gathering, data reliability testing, data analysis, summons for interviews and interrogations, calculation of losses and reports on investigative audit findings (Rozali, 2015). The follow the money technique can identify the components of a criminal act, namely the perpetrator, the crime committed and the results of the crime. The proceeds of a criminal act can be in the form of money or other assets.

Based on the facts and phenomena that have been disclosed, violations related to campaign funds still have a large potential risk. The practice of monitoring campaign funds that is limited to compliance with laws and regulations by submitting reports and post-election audits is still considered insufficient in realizing a clean election and supporting the implementation of good governance. The involvement of the PPATK can be the first step in a more comprehensive monitoring of campaign funds with a follow the money approach to RKDK of election contestants. This research was a case study of the monitoring and evaluation of campaign funds in the 2020 regional elections by the PPATK.

LITERATURE REVIEW

The “Follow the Money” Investigative Audit Technique

Forensic accounting and investigative auditing are scientific disciplines that always appear in an effort to examine or investigate fraud cases related to law. Forensic accounting is the application of the discipline of accounting in a broad sense, including auditing, to legal issues for legal settlement in or out of court, in the public and private sectors. While the investigative audit is an effort to prove, generally this evidence ends in court and the provisions of the applicable procedural law by applying several techniques. Singleton (2010:17) states that forensic accounting and investigative auditing both include processes that involve reviewing financial documents carried out for specific purposes, which will usually relate to litigation support and insurance claims as well as criminal matters.

In practice, investigative audits have types of techniques such as audit techniques, taxation techniques, follow the money, computer forensics and key techniques.
Follow the Money Technique on Campaign Fund Flow

Campaign Funds are a number of costs in the form of money, goods and services used by Candidate Pairs and/or Political Parties or Combined Political Parties that propose Candidate Pairs to finance Election Campaign activities. Campaign funds refer to all funds received and issued in the context of campaigning for candidates and political parties (Prasetyo, 2019).

Campaign Finance Disclosure or disclosure of campaign funds is an important part of electoral competition as a form of democratization of election administration. Disclosure of campaign finance is the dissemination of information about campaign contributions and election costs (Union of Columbia Municipalities, 2010).

As stated in Chapter IV Article 39 jo 48 PKPU Number 12 of 2020, the form of a campaign fund audit engagement in the Election is an audit of compliance with the laws and regulations governing Campaign Funds. The output of the compliance audit is in the form of a compliant or non-compliant opinion. The objective of the compliance audit as referred to is to assess the compliance of Campaign Fund reporting with the laws and regulations governing Campaign Fund.

The campaign finance audit is still limited to an audit related to compliance which only assesses the suitability of campaign finance reporting with campaign finance laws and regulations. Campaign finance audits are neither investigative nor comprehensive. Auditors do not have the obligation to investigate and ensure campaign finance transactions are in accordance with activities that occur during the campaign period, so they cannot provide a complete and adequate picture of the reality of campaign fund receipts and expenditures (Prasetyo, 2019).

METHODS

This study used a qualitative method approach with a case study paradigm in campaign funds monitoring by the PPATK in the 2020 election. In this study, the researchers collected data and information through interviews with PPATK Financial Transaction Analyst Officers, observations and
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documentation studies to describe how the PPATK supervised campaign funds with case studies in the 2020 election. The case study paradigm in this study investigated a particular event, situation, or social conditions and to provide insight into the process that explains how a particular event or situation occurred (Hodgetts & Stolte, 2012). In this case, the researcher wanted to know and see how the supervision and compliance with campaign funds in the implementation of the 2020 simultaneous regional elections to understand the event.

The location or area of this research included data from 270 regions in Indonesia participating in the 2020 Pilkada, covering 9 provinces, 224 regencies, and 37 cities, where data collection was carried out centrally through the Central Office for Financial Transaction Reports and Analysis domiciled in Jakarta, Indonesia. The researchers used several techniques to obtain data, namely Interview, Observation and Document Study. For the interview, the researcher referred to the Financial Transaction Analyst staff at the Financial Transaction Reports and Analysis Center (PPATK) who had been assigned to conduct a search on financial transactions as a form of monitoring the 2020 simultaneous regional election campaign funds and the researcher made direct observations of the research object, namely the Center Financial Transaction Reports and Analysis (PPATK). In this study, the researcher also conducted a study of related data acquisition documents through the data available at the Financial Transaction Reports and Analysis Center (PPATK).

Research model used in this study:

Figure 1: Research Model

- Compliance with laws and regulations
- Inflow and outflow of funds
- Source and destination of funds
- Sending and receiving parties
- Transaction time and location information
- The motive for the transaction
- Suspicious financial transactions with indications of violation of provisions
- Other relevant financial transaction information
RESULT

In the 2020 Regional Election, there were 270 electoral areas with details of 9 provinces, 224 regencies and 37 cities. The number of regional head candidate pairs was 741 participants.

In optimizing the role of the PPATK in order to realize clean election campaign funds, with integrity and free from money politics, especially in the context of preventing and eradicating money laundering (TPPU), the PPATK established a task force named “Satuan Tugas (Satgas) Pemilu” as stated in in the Decree of the Head of PPATK Number 169B of 2018 concerning the PPATK Internal Election Task Force.

Strategic implementation was carried out by PPATK in mitigating the risk of money laundering related to campaign funds and money politics in the 2020 regional elections with prevention and eradication efforts as well as coordination and cooperation with related parties. “Satgas Pemilu” the PPATK used the follow the money and risk-based approach in supervising and monitoring campaign funds.

Through the follow the money technique analysis on the RKDK, the PPATK could obtain information that cannot be obtained from the basic campaign fund audits, such as incoming and outgoing fund flows, sending and receiving parties, suspicious financial transactions with indications of violation of provisions, underlying transactions and other relevant financial transaction information.

As a first step in conducting an analysis with the follow the money technique, the PPATK coordinated with the reporting party (Bank Financial Service Providers) of special campaign funds bank account (RKDK) to submit account data. Based on risk-based approach parameters, a number of RKDK were continually monitored and in-depth analysis were carried out. The PPATK may request vouchers or any other documents of certain transactions from the Banks if necessary.

In the following, we describe Transactions from the results of research observations in Figure 2. Illustration of Transactions from research observations. (1) we analyzed from Solving transactions (structuring)
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to avoid limits on receiving donations by involving other parties; (2) Acceptance of donations made through the coordinator and deposited cumulatively which can obscure the origin of the source of funds; (3) Acceptance of donations from companies that are known to be partners with local governments or from APBD disbursement; (4) The receipt of donations reported by the candidate pairs in the LPSDK came from personal funds, but after an investigation it was discovered that the funds came from other parties; (5) Withdrawal of significant amounts of funds in cash with a certain nominal denomination.

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First Approach: Risk Based Approach

The monitoring of campaign funds by the PPATK used a risk-based approach by considering several factors, including Incumbent candidates who have direct access to the APBD; Candidates with a significant amount of funds in the RKDK; Electoral districts with a high risk of money laundering; Electoral areas with many candidates are considered to have a high risk of contestation; and Ex-convict candidates related to criminal cases.

Based on the results, we have found the transaction patterns related to Campaign Funds first, Structuring transactions of campaign funds through
the joint accounts of regional head candidates. Second, Donation through third parties. Donation from businessman and have an impact on indications of corruption and money laundering and Donations from entrepreneurs who are partners with local governments; Third, Placement of operational funds into the personal account of election organizers or supervisors, Donations from Regionally Owned Enterprises (BUMD) and Donations of campaign funds originating from entrepreneurs related to indications of criminal acts of corruption and money laundering.

We had additional evidence in our research observations related to the mode of transactions related to campaign funds are as follows Contributions to campaign funds came from entrepreneurs who often work on local government projects, Donations from individuals who work as members of the legislature who act as teams, Donations from individuals who served as directors of BUMD, Use of virtual accounts for the process of collecting campaign funds sourced from donations public and not registered as a Special Campaign Fund Account (RKDK), Donations from individuals, groups, private entities in cash that exceeded the provisions of the limit and performs transaction splits to avoid violating the provisions of the donation limit and the use of cash transactions in significant amounts.

**Second Approach: Red Flag Suspicious Transactions related to Campaign Funds**

Red Flags or indicators of suspicious financial transactions related to campaign funds as a guideline for Reporting Parties, especially Bank Financial Service Providers in reporting transactions to PPATK are as follows (1) Donations of campaign funds from entrepreneurs or entities who are partners with local governments; (2) Donations of campaign funds from individual parties who work as legislator and success team; (3) Donations of campaign funds from individual parties related to management of BUMD; (4) Use of a virtual account for collecting campaign funds from public donations and not registered as RKDK; (5) Use more than one (>1) RKDK; (6) Campaign funds from APBD; (7) Donations from individuals, groups, private entities in cash that exceed the limit provisions and structuring transactions to avoid violating the donation limit provisions; (8) Granting the authority of the RKDK (receipts and expenditures) to one party outside the structure of the campaign winning team; (9) RKDK
has no transaction activity (passive), both receipts and expenditures and does not reflect campaign operational transactions; (10) Use of personal accounts for campaign funds donation placement; (11) Significant amount of foreign currency exchange by party officials and direct transfer to personal account; (12) Campaign funds donation from the husband/wife/family of the candidate which is included as a category of other sources of individual donation funds; (13) Campaign fund donations through massive cash deposits by third parties in significant amounts in one transaction; (14) Campaign funds donation from the same Ultimate Beneficiary Ownership (UBO) through private business entity donations; (15) Donations exceeds the provisions of the limit for campaign fund donations; and (16) Cash withdrawal transactions in several branch office areas by structuring transactions in certain denominations.

Based on the RKDK analysis with follow the money investigative audit techniques, the compliance level was not fully complied with various indications of violations of campaign funds regulation as stated in the Election Commission Regulations Number 12 of 2020 and indication of money politics practice. Information related to findings and records of alleged significant violations were actually found outside of the RKDK so that tracking the flow of funds could not be done using a follow the money investigative audit technique.

**First Finding Category: Indications of Violation of Campaign Fund Terms**

Based on the analysis of the Special Campaign Fund Account and other information received by the PPATK, indications of violations of campaign finance provisions as stated in the Election Commission Regulations Number 12 of 2020 are:
### Table 1: Indications of Violation of Campaign Fund Provisions

<table>
<thead>
<tr>
<th>No</th>
<th>Description of the findings</th>
<th>Impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Acceptance of donations from several companies or individuals who have affiliations so that there are indications of efforts to solve transactions to avoid provisions related to restrictions on campaign fund donations</td>
<td>Reporting campaign funds that are not in accordance with the breakdown of donations to blur the limits of donations to private legal groups / legal entities (Article 7 paragraph (3) PKPU Number 12 Year 2020)</td>
</tr>
<tr>
<td>2</td>
<td>Acceptance of donations made through the coordinator / success team of the candidate pairs, then deposited into the bank by the coordinator / success team directly / cumulatively. Funds received through this mechanism cannot be trusted with regard to the origin of the source of funds</td>
<td>Inappropriate reporting of campaign finances by obscuring the origins of campaign funding sources (Article 8 paragraph (2) PKPU Number 12 of 2020)</td>
</tr>
<tr>
<td>3</td>
<td>Receipt of donations from several affiliated companies whose majority shares are owned by foreign investment companies (PMA)</td>
<td>Reporting campaign funds that are not in accordance with the breakdown of donations to blur the limits of donations to private legal groups / legal entities (Article 7 paragraph (3) PKPU Number 12 Year 2020)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Receipt of campaign funds from foreign parties (Article 49 PKPU No. 12 of 2020)</td>
</tr>
<tr>
<td>4</td>
<td>Acceptance of donations from companies that are known to be partners with the local government</td>
<td>The potential for conflict of interest with the incumbent regional leader position, both during the ongoing term of office and in the future if re-elected as regional head</td>
</tr>
<tr>
<td>5</td>
<td>The receipt of donations reported by the candidate pairs in the LPSDK came from personal funds, but after an investigation it was discovered that the funds came from other parties.</td>
<td>Reporting campaign funds that are not in accordance with efforts to provide false reports (Article 51 PKPU Number 12 of 2020)</td>
</tr>
<tr>
<td>6</td>
<td>Recorded donation receipts come from a Fund Disbursement Order (SP2D) by the incumbent regional leader candidate</td>
<td>Misuse of APBD for campaign funds.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Reporting campaign funds that are not in accordance with efforts to provide incorrect reports (Article 51 PKPU Number 12 year 2020)</td>
</tr>
</tbody>
</table>

**Source:** Processed by Researchers

**Second Finding Category: Indications of Money Politics**

Based on the RKDK analysis and other information received by the PPATK, indications of violations of campaign administration (money politics). First, Withdrawal of money in certain denominations (5 thousand, 10 thousand, 20 thousand or 50 thousand rupiah) carried out by affiliated
parties up to billions of rupiah. Second, Disbursement of Corporate Social Responsibility (CSR) funds which are not in accordance with the procedures by the Regionally Owned Enterprises (BUMD). Reasonably suspected to be related to the interests of incumbent candidates.

The practice of money politics aims to gain support from the community in order to be successfully elected in elections. The public will receive instant rewards in the form of cash given by certain political candidates or contestants to influence their choices.

The losses experienced by the community in the practice of money politics are not directly, but have an impact in the future. People do not realize that the impact of losses that may occur is far greater than the benefits they get. The impact of money politics can be harmful to society as a whole and can even harm the state with various new problems that may occur. In addition, the practice of money politics also destroys the democratic order in a country (Fitriani et al., 2019).

The issue of money politics in elections, especially political dowries and buying and selling of votes has a wide impact. In the short term, these two diseases will damage the momentum of the five-year elite circulation that should be an opportunity to present people’s sovereignty. Meanwhile, the long-term impact is that the post-election government which is colored by money politics is feared to be trapped in a vicious circle of political corruption. The common thread, political dowry and buying and selling of votes will make the cost of winning the election more expensive which risks political corruption (Sjafrina, 2019).

CONCLUSIONS

The following are findings based on the results of research conducted by the researchers which aimed to find out and obtain information related to compliance with campaign funds for regional elections in 2020 through follow the money investigative audit techniques in accordance with regulatory provisions in the perspective of PKPU Number 12 of 2020.
For evaluation of the election in terms of campaign funds, the research findings have implied that, first, the audit of campaign funds by public accountants (KAP) is still limited to compliance which only assesses the suitability of campaign funds reporting with campaign funds laws and regulations. Second, monitoring of campaign funds by the PPATK with the follow the money investigative audit technique could assist to find out the flow of campaign funds from the source to the destination of funds objectively; Third, the results of monitoring the 2020 Election campaign funds by the PPATK with follow the money investigative audit techniques, showed that the compliance level has not fully been complied, with various indications of violations of campaign funds regulation as stated in the Election Commission Regulations Number 12 of 2020 and indication of money politics. Fourth, Information related to findings and records of alleged significant violations were actually found outside of the RKDK so that tracking the flow of funds could be done using a follow the money investigative audit technique. Fifth, there has been no adequate follow up on the PPATK’s financial intelligence information related to the supervision of the 2020 Pilkada campaign funds submitted to the election organizers and supervisors (KPU/Bawaslu).

In this study, we have recommendations that can contribute to political and investigative audit studies. First for the PPATK, implementation of a risk-based approach based on a Politically Exposed Person (PEP) profile and family affiliation and Socialization of the public complaint channel (Dumas) as a tool to report complaints of alleged violations related to campaign funds.

Second, we suggest that Reporting Parties such as Financial Services Provider (Bank) improve the quality of reporting Suspicious Transaction Reports related to campaign funds and Dissemination of transaction patterns, modes and red flags of suspicious financial transactions related to campaign funds to branch units as frontliners.

Third, our recommendation is that Election Organizers and Supervisors (KPU/Bawaslu) must follow up on the PPATK financial transaction report as financial intelligence information, implement regulations and sanctions against violators of campaign funds and/or election provisions, improve coordination with vertical KPU and Bawaslu units in the regions to follow up on findings of alleged violations and Update the provisions regarding
the acceptance of campaign fund donations through cash deposits and affiliated parties.

And governance must strengthen the role of “Sentra Penegakan Hukum Terpadu Pemilu” (Sentra Gakkumdu) and ensure that there is no misuse of APBN/APBD in election campaign funds.

REFERENCES


Peraturan Bersama Ketua Badan Pengawas Pemilihan Umum Republik Indonesia, Kepala Kepolisian Negara Republik Indonesia, Jaksa Agung Republik Indonesia Nomor 5 Tahun 2020, Nomor 1 Tahun 2020, Nomor 14 Tahun 2020 tentang Sentra Penegakan Hukum Terpadu pada Pemilihan Gubernur dan Wakil Gubernur, Bupati dan Wakil Bupati, serta Walikota dan Wakil Walikota.


284
Undang-Undang Nomor 8 Tahun 2010 tentang Pencegahan dan Pemberantasan Tindak Pidana Pencucian Uang.


# APPENDIX 1

## Interview Guidelines

<table>
<thead>
<tr>
<th>Formulas Problem</th>
<th>Indicator</th>
<th>Question</th>
</tr>
</thead>
<tbody>
<tr>
<td>How to monitor and evaluation fund campaign on Pilkada simultaneously year 2020 by PPATK</td>
<td>Supervision process fund campaign, RKDK analysis by PPATK</td>
<td>How plot or monitoring process fund campaign by PPATK?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>From 270 participants Pilkada in 2020, does INTRAC analyze all RKDK participants?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Who the parties involved in the process of supervision fund campaign?</td>
</tr>
<tr>
<td></td>
<td>Genre fund enter and fund go out</td>
<td>How analysis Genre fund enter and fund go out on the RKDK?</td>
</tr>
<tr>
<td></td>
<td>Source and objective fund</td>
<td>How analysis source and objective fund on the RKDK?</td>
</tr>
<tr>
<td></td>
<td>Party sender and receiver fund</td>
<td>How analysis to party sender and receiver fund on the RKDK?</td>
</tr>
<tr>
<td></td>
<td>Information time and location transaction</td>
<td>How analysis to information time and location transaction on the RKDK?</td>
</tr>
<tr>
<td></td>
<td>Alleged motive is done transaction</td>
<td>How analysis to party sender and receiver fund on the RKDK?</td>
</tr>
<tr>
<td></td>
<td>Evaluation on PPATK analysis</td>
<td>In Thing PPATK analysis submitted to Bawaslu, what response or feedback from Bawaslu?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>How evaluation supervision fund campaign Pilkada year 2020?</td>
</tr>
<tr>
<td>How analysis obedience fund campaign on Pilkada simultaneously year 2020 in perspective Regulation Commission Selection General (PKPU) Number 12 of 2020</td>
<td>Obedience to regulation or regulation legislation</td>
<td>In corner PPATK view, how analysis obedience fund campaign refers to on provision or existing regulations?</td>
</tr>
<tr>
<td></td>
<td>Transaction finance suspicious with indication violation provision</td>
<td>is found transaction finance suspicious related indication violation conditions?</td>
</tr>
<tr>
<td></td>
<td>Information transaction finance relevant other</td>
<td>Violation what was found?</td>
</tr>
<tr>
<td></td>
<td></td>
<td>is there is information transaction finance relevant others who become PPATK notes?</td>
</tr>
</tbody>
</table>
APPENDIX 2

Proof of receipt of transaction receipt of funds from the disbursement of CSR BUMD which allegedly violates procedures and is used for the benefit of campaigning for regional heads who are advancing as incumbent candidates.
SLIP SETORAN

Tanggal: 24 SEP 2020
Nomor: B123456
Nama: Andi Setiawan
Pembayaran: Pajak
Jumlah: Rp 2,500,000.00

AKUNTANSI

KWITANSI

Nomor: K123456
Tanggal: 24 SEP 2020
Pemilik: Andi Setiawan
Jumlah: Rp 2,500,000.00

Di / In
Jumlah Sebesar
Amount (in words)
Untuk / For

Terbilang Rp. 2,500,000.00
Terbilang bersih Rp.

Tanda Tangan Kasir
Yang Menyelesaikan

Pengesahan Penabung Bank.
Kesepakatan Signature