

**FOLLOW-UP ANALYSIS RESULTS REPORT THE FINANCIAL
TRANSACTION REPORTS AND ANALYSIS CENTER IN THE PROCESS
OF INVESTIGATION IN MONEY LAUNDERING IN INDONESIA**

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Abstract

Efforts to eradicate the crime of money laundering, Indonesia has an agency that specializes in reporting the possibility of money laundering and will conduct an analysis of suspicious financial transactions, namely the Financial Transaction Analysis Reporting Center. The report on the results of the Financial Transaction Analysis Reporting Center analysis should become a basic material that has value by law enforcers to carry out the process of preventing and eradicating money laundering in Indonesia, just like the Supreme Audit Agency of the Republic of Indonesia, where the Analysis Result Report can be used as the basis for the existence of state financial losses or potential loss to the country's economy. The highlight in this paper is the Follow-up to the Report on the Results of the Financial Transaction Analysis Reporting Center Analysis in the Investigation Process of Money Laundering in Indonesia. The approach method used is juridical normative, namely analytical descriptive legal research which is conducted by examining secondary data in the form of positive law literature in Indonesia and its implementation in practice. The results of the research will be analyzed qualitatively juridically, namely how to analyze the data obtained without using statistical formulas. The result of this research is that not all reports submitted by the PPATK to investigators are followed up by the investigators. The report on the results of the analysis that was not followed up by the investigator was a report on the results of the analysis which was of poor quality because there was no element of money laundering crime as well as the unclear identity of the customer (profile).

Keywords: Financial Transaction Analysis Reporting Center, Investigation, Money Laundering

INTRODUCTION

The development and advancement of science and technology, especially in communication, has resulted in the integration of the financial system, including the banking system, which offers a cross-border nations mechanism that can be carried out quickly. (Afandi & Achmad, 2013; Fitriyanti, 2015) As is well known, banking, as a public trust institution, plays an important role in a country's economic system. In addition to banking, it is the medium for implementing various monetary policies stipulated by the monetary authority, namely

circulating money as a means of payment, implementing a tight money policy, and increasing lending to the public.(Suranta, 2010)

The rapid development of technology not only has an influence on developments in the field of communication but various other sectors, be it in the political, economic, socio-cultural fields, one of which is developing rapidly is the problem of crime, but also legal instruments to prevent and eradicate this crime.(Asri Agustiwi, 2016; Koloay, 2016) Themselves are inadequate and are still far behind, so that various types of crimes, whether committed by individuals, groups, or corporations, easily occur and produce large amounts of assets.(Amalia, 2016; Mulyana, 2018) These crimes are committed within the borders of one country and spread across the boundaries of other countries, so it is often referred to as transnational crime, in transnational crimes, assets resulting from crimes are usually hidden by the perpetrator, then issued again if they were legal. This is better known internationally as money laundering.(Ilyas, 2011; Nasution, 2011)

Money laundering is a serious crime when considering its services to the continuation of crime. Ping states the following:

"Money laundering is a serious crime, and it is therefore essential to understand where it is at its most vulnerable. At present criminals will tend to seek more sophisticated and complex techniques, as a result of strong anti-money laundering legislation, regulation and practices. Laundering money through financial systems, however, is still a vital component part. This phenomenon, to a certain extent, is due to the increasing liberalization and integration of world financial markets, the removal of barriers to the free movement of capitalx "(Ping, 2004)

The financial system is very functional for organized and white-collar criminals. The purpose of money laundering is to obscure the origin of the money entered into the financial system. Thus, money laundering's negative impact is enormous for a country and can reach a region (regionally). Money laundering is of great interest at the international level, not only because of its widespread development but also because of its potential destructive power to society as a whole. It also weakens the integrity of financial institutions and weakens public confidence in the financial system. Money laundering can make it easier for predicate crimes to

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finance their activities independently, diversify, and increase criminals' funds by reinvesting them. Money laundering also has a corrosive effect on economic development and political stability.(Ping, 2004)

Irman S stated that: "Money laundering is an act or attempt by a criminal to hide or disguise the origin of assets obtained from a criminal act by entering the proceeds of crime into the financial system, particularly the banking system both at home and abroad. to avoid prosecution for crimes that have been committed and securing the proceeds of crime from confiscation by legal officials.(Irman, 2006) Meanwhile, according to Pande Silalahi, money laundering can be interpreted as follows: "Money laundering is the deliberate act of depositing or transferring wealth (money) originating from a crime or a criminal act to hide or obscure the origin of said assets. In other words, money laundering is a process of transforming haram money into lawful money.

In various countries, such as in developing countries the problem of money laundering has been regulated in a law which states that money laundering is a crime and punishes the perpetrators. Prevention and eradication of money laundering activities can be done through a criminal approach, or through a non-criminal approach such as regulation and administrative action.

The participation of the Government of Indonesia in efforts to prevent and eradicate money laundering is an implementation of the UN mandate and the UN Convention Against Illicit Traffic in Narcotics, Drugs and Psychotropic Substances of 1988 which was later ratified by the Government through Law Number 7 of 1997.

In the 2000 report, Indonesia was listed as a major laundering country along with forty-one other countries by the United States Department of State. Apart from that, in June 2001 Indonesia together with nineteen other countries, including the Philippines and Myanmar, were now included in the list of Non-Cooperative Countries and Territories (NCCTs) by the Financial Actions Task Force on Money Laundering (FATF).(Husein, 2007)

Law No. 15 of 2002 concerning the Crime of Money Laundering was promulgated on April 17, 2002 through the State Gazette of the Republic of Indonesia of 2002 No. 30 as later amended by Law No. 25 of 2003 through State sheet of 2003 No. 108. Hereinafter referred to as Money Laundering Laws. The Money Laundering Laws is expected by many parties as a legal basis to anticipate various patterns of crimes that lead to money laundering.(Siahaan, 2008)

The important point of the Money Laundering Laws objective is to prevent and eradicate the money laundering system or process in the form of placement, layering and integration. Bank and non-bank financial institutions are the main means of money laundering, so the regulatory objectives of the Money Laundering Laws include the active roles of financial institutions to anticipate money laundering crimes.

The provisions of the Money Laundering Laws of 2003 stipulate that an institution that can record transactions is needed in order to assist in making efforts to prevent and eradicate the crime of money laundering. Not only in the 2003 Money Laundering Laws, now in the new Law it has been changed to Law No. 18/2010 concerning the Prevention and Eradication of the Crime of Money Laundering is further stipulated regarding the Financial Transaction Reports and Analysis Center, which was later called the PPATK.

Based on the provisions of the law on money laundering, PPATK is classified as a Financial Intelligence Unit (hereinafter referred to as FIU) which refers to model administration, because PPATK only has the authority to receive and process information which is then conveyed to law enforcement authorities to follow up on it. The main task of the PPATK is to assist law enforcement in preventing and eradicating the crime of money laundering by providing intelligence information resulting from analysis of reports submitted to PPATK.

In order to carry out the function of analyzing or examining reports and information as referred to in Article 40 letter d of the 2010 Money Laundering Law, PPATK may forward the results of the analysis or examination to investigators. PPATK conducts examination of suspicious financial transactions related to money laundering or other criminal acts. In the

event that any indication of money laundering or other criminal acts is found, the PPATK submits the Examination Results to investigators for investigation.

In order to carry out an investigation, prosecution, and examination in court against the crime of money laundering, it is not necessary to prove the original crime. Where the investigator finds sufficient preliminary evidence of the occurrence of the crime of money laundering and predicate offenses, the investigator combines the investigation of predicate crime with the investigation of the crime of money laundering and notifies the PPATK. (Yusuf, 2010)

The starting point of the problem which is the reference in this study includes two things, first Can the Analysis Result Report be viewed as preliminary evidence of the Crime of Money Laundering? And how do investigators follow up the PPATK Analysis Result Report which indicates the occurrence of the Crime of Money Laundering.

METHODOLOGY

The approach method used is juridical normative, namely analytical descriptive legal research conducted by examining secondary data in positive law literature in Indonesia and its implementation in practice.

RESULT AND DISCUSSION

1. PPATK as the Financial Intelligence Unit in Indonesia

In international practice in the field of money laundering, institutions such as the PPATK are referred to as generic financial intelligence units (hereinafter referred to as FIU). The existence of this FIU was first implicitly regulated in forty recommendations (Forty Recommendations) from the Financial Action Task Force on Money Laundering (FATF).

FIU is a permanent institution that specializes in money laundering. This institution is one of the most important infrastructures in efforts to prevent and eradicate money laundering crimes in each country. The existence of this special institution is absolutely necessary and plays a very strategic role because the problem of money laundering is a fairly complex issue,

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involving organized crime that understands various sophisticated techniques and modes of crime. Handling of money laundering is becoming more severe, especially because the characteristics of this crime are generally carried out across national borders (cross-border).

The formation of a special lambaga to deal with money laundering has been done for a long time in several countries. Australia, for example, has AUSTRAC (Australian Transaction Reports and Analysis Center) which was founded in 1989. FINCEN (Financial Crime Intelligence Network) we know as the financial intelligence unit in the United States which was founded in 1990. Meanwhile, the presence of similar institutions in Southeast Asia is relatively only known in recent years. We are familiar with several institutions such as AMLO (Anti Money Laundering Office) in Thailand which was founded in 1999, Unit Perisi Kewangan in Malaysia which was founded in 2001, Suspicious Transaction Reports Office (STRO) Singapore in 2000 and The Office of Anti Money Laundering in The Philippines since 2001. In Indonesia, in order to carry out the above mission, the Financial Transaction Reports and Analysis Center (PPATK) has been established since 17 April 2002 based on Law no. 15 of 2002 concerning the Crime of Money Laundering.

In Indonesia, we have PPATK as a Financial Intelligence unit with an administrative model which is an independent institution that reports to the President. This administrative model functions more as an intermediary between the public or the financial services industry and law enforcement institutions. The incoming reports are analyzed first by this agency and then reported to law enforcement agencies, namely the Police and the Attorney General's Office.

A financial intelligence unit usually carries out several tasks and authorities, namely regulatory duties as a regulator, cooperates in the framework of law enforcement, cooperates with the financial sector, analyzes incoming reports, safeguards all existing data and assets, carries out international cooperation and administrative functions. general. As a financial intelligent unit, the PPATK also performs this function.

In an effort to fight the practice of money laundering in general, a special institution or body called the Financial Intelligence Unit (FIU) has been formed. Such an institution in

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Indonesia is called the Financial Transaction Reporting and Analysis Center which is a foreign term The Indonesian Financial Transaction Report and Analysis Center (INTRAC). The term Financial Intelligence Unit when interpreted in Indonesian words as follows: financial which means finance, intelligence means intelligence, namely the person who is in charge of looking for (observing) someone; secret service.

Seeing the FIU authority standards, the PPATK has carried out the FIU authority standards from the Egmont Group. However, there are several substances that are not provided to PPATK, namely the lack of adequate access to everyone. The access granted to PPATK is only limited to financial institutions as stipulated in Article 27 paragraph 1 UUPU. Then the PPATK also does not have the authority to impose sanctions on reporting parties who do not fulfill their obligations, but only recommend to regulators from the reporting party.

Table:
4 (four) Types of FIU in Different Countries

FIU Country / Name	Institutional Status	Location	Authority
ADMINISTRATIF TYPE			
PPATK, AUSTRAC (Australia), FINTRAC (Kanada), FinCEN (Amerika)	Independent or not independent	Those who are not independent are usually under a supervisory authority or a law enforcement agency	Intelligence gathering
LAW ENFORCEMENT TYPE			

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Austria – A-FIU (Central Department against Organised Crime)	Not independent (Part of the Ministry of Home Affairs)	Ministry of Internal Affairs	<ul style="list-style-type: none"> ▪ Intelligence gathering ▪ Investigasi
Germany–BKA (Bundeskriminalamt)	Not Independent	Germany Federal Police Office	<ul style="list-style-type: none"> ▪ Intelligence gathering ▪ Investigasi
Ireland – MLIU (Money Laundering Investigation Unit)	Not Independent (part of the police)	An Garda Sioganan	<ul style="list-style-type: none"> • Intelligence gathering • Investigation • Supervision of AML regulations • Compliance Function • Reporting party training
Sweden – FIPO (Finanspolisen)	Not Independent (part of the police)	National Criminal Investigation Department	<ul style="list-style-type: none"> ▪ Intelligence gathering and disseminating ▪ Regulatory or ▪ Complain Function
Swiss – MROS (Money Laundering Reporting Office Switzerland)	Not Independent (part of the police)	Federal Police (Fedpol)	<ul style="list-style-type: none"> ▪ Intelligence gathering ▪ Investigasi
United Kingdom – ECU (Economic	Not Independent (part of the	National Criminal	▪ Apure

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Crime Unit)	NCIS)	Intelligence Service	Intelligence gathering and disseminating <ul style="list-style-type: none"> ▪ Training Financial Institutions ▪ Investigations are carried out by NCIS
Judicial Type			
Cyprus – MOKAS (or Unit for Combating ML – in English)	Not Independent	Attorney General Office	<ul style="list-style-type: none"> ▪ Intelligence gathering ▪ Active Investigation by the Police within the Unit ▪ Prosecution
Luxembourg – FIU – LIX (Anti Money Laundering Service)	Not Independent	Legal Prosecution Office	<ul style="list-style-type: none"> ▪ Intelligence gathering ▪ Active Investigation ▪ Prosecution
HIBRID TYPE			
Denmark – Hvidvasksekretariatet (The ML Secretariat)	Not Independent	The Public Prosecutor for Serious Economic	<ul style="list-style-type: none"> ▪ Intelligence gathering ▪ Occasional

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		Crime	Investigation
Jersey – FIU (Joint Police and Customs Investigation Unit)	Not Independent	A joint unit comprising officers from Police and Customs	<ul style="list-style-type: none"> ▪ Inteligence gathering ▪ Investigation
Norway – OKOKRIM (ML Unit)	Tidak independen	The Natioanl Authority for Investdigation and Prosecution Economic and Environmental Crime	<ul style="list-style-type: none"> ▪ Combined of Police and Prosecution authority
Hongkong – JFIU (Joint Financial Inteligence Unit)	A joint unit comprising officers from police and customs. Placed in Hongkong Police Force	Police Headquarter (Hong Kong Police Force))	<ul style="list-style-type: none"> ▪ Inteligence gathering
Thailand – AMLO (Anti Money Launderidng Office)	Independent	Independent	<ul style="list-style-type: none"> ▪ Inteligence gathering ▪ Investigation ▪ Asset forfeiture/confiscation ▪ Asset management program ▪ Training/socia lization
Philippines – AMLC (Anti Money	A counsil	Independent	<ul style="list-style-type: none"> ▪ Inteligence

Laundering Council)	comprising Governor of the Central Bank as chairman and the Commissioner of Insurance Commission and Chairman of the Security Exchange Commission as members	gathering
		<ul style="list-style-type: none"> ▪ Investigation ▪ Arrest ▪ Asset Forfeiture (including civil forfeiture) ▪ Prosecution ▪ Impose sanction ▪ Examine of AML non-compliance ▪ Training/socialization

Source: Financial Transaction and Analysis Reporting Center (PPATK)

2. The PPATK Analysis Result Report that cannot be forwarded by the Investigator

PPATK by virtue of its authority, helps investigators to obtain such other evidence, by conducting an audit of the PJK by first coordinating with the agency that supervises the PJK; to obtain information data about customers and their deposits, and in exercising this authority, the PPATK is exempted from the provisions concerning bank secrecy. Investigators can obtain other completeness of evidence by using the authority given by the existing statutory provisions.

In general, the process of handling money laundering cases is no different from the handling of other criminal cases. However, in the handling of cases of money laundering, a relatively new institution is involved, namely the PPATK.

The involvement of the PPATK is more in providing confidential financial information (financial intelligence) to law enforcers, especially to investigators of money laundering crimes, namely police investigators. The handling process is as follows:

- a. Role of Financial Service Providers (PJK), FIUs and Society The main role of PJK, FIUs from other countries and the public in handling money laundering cases is to provide initial information. The reports and information are:

- 1) The report from the Financial Services Authority as mentioned in the previous description that in accordance with Article 13 of the TPPU Law, the reporting obligations of PJK to PPATK are regulated in the form of Suspicious Transaction Reports (STR) and Cash Transaction Reports (LTKT). CTR) to PPATK. Inside the PPATK, these reports are received by the Compliance Directorate, to be forwarded to the Directorate of Analysis after checking the completeness of the report.

In accordance with Article 1 number 7 UUTPPU, LTKM is: financial transactions that deviate from the profile, characteristics, or transaction patterns of the customer concerned; financial transactions by customers that are reasonably suspected of being carried out with the aim of avoiding the reporting of the transactions concerned that are required to be performed by Providers of Financial Services in accordance with the provisions of the Law; financial transactions conducted or canceled by using assets suspected of originating from the proceeds of crime.

If the PJK knows one of the 3 (three) elements of a suspicious financial transaction, it is sufficient for the PJK to submit it to PPATK as LTKM. LTKM is more of a financial transaction information and does not yet have quality as an indication of a criminal act. The FSP does not have the capacity to judge a transaction as having criminal indications. Therefore, the PPATK is obliged to

carry out this LTKM analysis to identify whether there are indications of money laundering and other criminal acts.

To perform this analysis, one of the supporting data is LTKT from PJK. In this regard, in handling money laundering cases, the role of PJK is very helpful both in providing information about customers and their deposits, and helping PPATK and law enforcement agencies to assess the flow of funds from parties requested by PPATK and law enforcement agencies.

Reports from the public, although the law does not regulate the PPATK's authority to receive information from the public, PPATK often receives various information indicating criminal acts. With this information, the PPATK Legal Directorate conducted an analysis to identify whether there were indications of money laundering and other crimes. This information from the public was received by PPATK through written letters and through the internet

- 2) Information from law enforcement officials in the handling of a case by investigators, often the assets resulting from a criminal act are indicated by the perpetrator to be hidden or disguised through various special actions through financial institutions, such as: placements with banks in the form of deposits, demand deposits or savings as well as transfers to other banks; purchase of an insurance policy; purchase of money market and capital market securities; or other actions such as spending, exchanging or being taken abroad.
- 3) Information from the Financial Intelligence Units of other countries is based on the results of the PPATK analysis, a lot of important information from FIUs in other countries has resulted in money laundering and other criminal cases. This information, whether requested or not requested, is in accordance with the standards of information exchange in the principles of the FIU worldwide association which is incorporated in a forum known as the Egmont Group.

- b. The role of the PPATK according to Article 26 of the TPPU Law PPATK's duties include: collecting, storing, analyzing, evaluating reports and information above. In addition, PPATK can provide recommendations to the Government in relation to the prevention and eradication of the crime of money laundering, report the results of analysis of financial transactions indicating money laundering to the Police for the purposes of investigation and the Prosecutor's Office for prosecution and supervision purposes, prepare and submit reports regarding analysis of financial transactions and other activities periodically to the President, DPR and institutions authorized to supervise Financial Service Providers (PJK). In conducting the analysis, the PPATK collects information from various parties, both from FIUs from other countries and from domestic agencies that have or have not signed the MOU with PPATK so that the results of the analysis will have added value to facilitate the law enforcement process.

3. The Analysis Result Report which can be continued in the Investigation Process

Investigation is a term that is meant in parallel with the meaning of *opsporing* (Dutch) and *investigation* (English), the Criminal Procedure Code hereinafter abbreviated as KUHAP provides the meaning in Article 1 point 2, what is meant by investigation is: A series of actions by the investigator in terms of and according to the method regulated in this law is to find and collect evidence of what happened and to find the suspect.

In the event that money laundering has been suspected, the police, prosecutors and the corruption eradication commission and PPNS as investigators have been determined by law. This is confirmed in article 31 UUPU No. 25 of 2003: "In the event that there is a suspicion of money laundering based on a suspicious financial transaction report, within 3 (three) working days at the latest from the alleged existence, the PPATK is obliged to submit the results of the analysis to investigators for further action.

Article 68 of Law No. 8/2010 concerning the Prevention and Eradication of the Crime of Money Laundering states that: Investigation, prosecution and examination in court proceedings as well as implementation of decisions that have obtained permanent legal force against criminal acts as referred to in this Law shall be carried out in accordance with the provisions of laws and regulations, unless otherwise stipulated in this Law.

This means that the procedural law used for the crime of money laundering, both at the level of investigation, prosecution and court examination is to use the Criminal Procedure Code (KUHP) as long as it is not stipulated otherwise by the Criminal Law of Money Laundering. The analysis result report is a confidential matter, so that the LHA which has been processed from the LTKM is submitted directly to the Chief of Police, closed and sealed. The LHA that has been received by the Chief of Police is continued to the Head of Sub-Directorate in the same situation, the LHA which has been received is then held a coordination meeting with the investigators of money laundering crimes. Through the coordination meeting it was determined whether there was an alleged crime of money laundering or not? The conclusion of the LHA is not something certain about the occurrence of a criminal act of money laundering so that the LHA obtained is reconstructed and a detailed investigation plan is made by the investigator.

Investigations carried out are not only looking for a criminal incident through the data received but using data tactics carried out through the investigating office of the money laundering crime. As stated above, the analysis report from the PPATK is not only the result of a proactive analysis, it is the result of analysis based on the information submitted to the PPATK. The results of reactive analysis are made based on requests for information (inquiries) from law enforcement officials related to criminal acts currently being handled by law enforcement officials.

The report on the results of the analysis received by the investigators from the PPATK is followed up only at the level of investigation to find a criminal incident, however, all money laundering cases handled by the Police at the request of the investigator constitute LHA which can be followed up until the time of investigation. This is because it is known that there is an

illegal act in money laundering which is the main element contained in article 3 of the Money Laundering Criminal Act, predicate crime is found, so investigators only need to find other evidence of a criminal act. money laundering. If a criminal incident has been found, the investigator will be issued a warrant, in order to fulfill the needs of the investigation.

a. Case Handling

Investigation of a case according to Article 109 of the Criminal Procedure Code must always be preceded by the task of a Notification Letter for the Commencement of Investigation, hereinafter referred to as SPDP which is notified to the public prosecutor (prosecutor). Investigation of a criminal act begins with the occurrence of an event which is known or conveyed to the investigator, through the existence of:

- 1) Information;
- 2) Police Report or Report;
- 3) Complaint;
- 4) Circumstances caught red-handed;
- 5) Submission of suspects and / or evidence; from society or institutions outside the National Police

A report is a notification conveyed by a person due to rights or obligations based on law to the competent official regarding whether a criminal event has been or is or is suspected of occurring. Police Report is a written report prepared by a Polri officer regarding a notification given by a person because of his rights or obligations under the law, that a criminal event will, is currently or has occurred.

Every incident that is known, reported, reported to the Police or investigators is not yet a definite criminal act, for that we need an investigation process to determine whether the incident is a criminal act or not. If it is a criminal act, the investigator, according to his obligations, has the authority to carry out an investigation according to the method specified in the Criminal Procedure Code. On the other hand, if it is not a criminal act,

then the investigator has no obligation to carry out an investigation and simultaneously the law / KUHAP does not authorize to act as an investigator.

b. The function of Evidence in Criminal Process

Article 6 paragraph (2) of Law Number 14 of 1970 concerning Basic Provisions of Judicial Powers states that no one can be sentenced to punishment unless due to legal means of proof according to law, and the judge has confidence that someone is deemed to be responsible. , has been guilty of the act he was accused of.

This is confirmed in Article 183 of the Criminal Procedure Code which states that a judge may not impose a sentence on a person unless, with at least two valid evidence, he is convinced that a crime could have occurred and the accused was guilty of committing it.

This, it is not only the suspect who is the perpetrator of a criminal act that investigators must look for or find, but also the material of evidence must be found. This is in line with the main function of criminal procedural law, which is none other than reconstructing the incidents of a perpetrator and his actions which were prohibited, while the complementary tools of the business are evidence. Perpetrators, criminal acts and evidence are the focus of efforts to seek and find material truths.

c. How to Obtain Evidence for Investigative Purposes

Evidence obtained by the investigator can be temporarily taken over or kept under his control and the evidence can be obtained by the investigator through, among other things: examination at the scene of the case (TKP); search; submitted directly by the reporting witness or suspect; taken from a third party; discovery things.

The search for evidence is carried out by the investigator must be based on the procedure regulated in the Criminal Procedure Code, in general it can describe how and where the evidence is obtained, namely:

- 1) The scene of the case (TKP)

The scene of the case is the place where the suspect or victim and / or evidence related to the crime can be found. Investigators must immediately go to the scene of the case because the scene of the case is an important source of information and

evidence that can indicate / prove a relationship between the victim, perpetrator, evidence and the scene of the case itself. From this relationship, efforts are made to be able to reveal the main issues related to the criminal act itself, including, among others, whether the criminal act occurred, who the perpetrator is, what is the modus operandi of it.

2) Search

Basically, a person must not enter and step on someone else's garden or look for something hidden in someone else's clothes or body without the permission of the person concerned. It is against human rights. However, for the purposes of investigation, the law gives investigators the authority to conduct searches. There are 3 (three) types of searches, namely: house searches; body search; clothing searches. The provisions regarding searches are regulated in Articles 32–37 of the Criminal Procedure Code. If the investigation is carried out without heeding the provisions as mentioned above, the investigator can be prosecuted under Article 29 of the Criminal Procedure Code.

3) Submitted directly by the reporter or suspect

Sometimes the evidence is submitted by the reporter or the suspect to the investigator, however, the investigator must still be able to explain that the evidence is related to a criminal act.

4) Taken from or submitted by a third party

It can happen that the goods connected with the criminal act by the suspect have been transferred to another person / party, either by selling, handing over, exchanging, giving, pawning, or loaning to another person, in this case the investigator for the purpose of investigation can confiscate the object. -the object referred to.

5) Found items

Findings are items that are found, submitted or reported by the public to investigators, where the owner or identity of the item is not known. Investigators must make clear whether the said goods were involved in a criminal act or not.

6). Foreclosure

It is regulated in Article 1 point 16 of the Criminal Procedure Code that it is stated: Confiscation is a series of actions by an investigator to take over and or keep under his control movable, tangible or intangible objects for the benefit of evidence in investigation, prosecution and trial.

Confiscation is carried out by the investigator by asking permission from the court, except in very necessary and urgent circumstances, the investigator can report to the head of the court, in order to obtain approval. Objects that can be confiscated are objects that are used as a means of committing a criminal act, objects obtained or the results of a criminal act, objects that are not directly related to the criminal act, but have strong reasons for evidence, substitute evidence. , for example, the object that was stolen was money, then the suspect had bought the money. Article 39 of the Criminal Procedure Code states items that are subject to confiscation.

The skills and knowledge of investigators, including PPNS, are needed for a successful investigation. In accordance with the principle of law enforcement, namely the "Criminal Justice System" wants integration in law enforcement, which means that the success of prosecution is a continuation of the success of the investigation.

CONCLUSION

1. The results of the PPATK analysis are the results of analysis that are processed through a model administration system because they are Intelligent Unit, the results of the PPATK analysis as material to be submitted to investigators do not support the investigating apparatus in the process of investigating the Crime of Money Laundering, so the Police

conduct an investigation. repeat like any other criminal act to discover the existence of a criminal event and to obtain preliminary evidence and witnesses.

2. The report on the results of the PPATK analysis is based on its obligation to submit the Analysis Result Report on indications of money laundering. Not all reports submitted by PPATK to investigators are followed up by investigators. LHAs that are not followed up by investigators are of poor quality because there are no elements of money laundering and the identity of the customer is not clear (profile). Meanwhile, LHAs that can be followed up by investigators to the stage of investigation are LHAs that have indications of a crime of money laundering, LHAs that are followed up by investigators are LHAs submitted by PPATK based on requests from investigators. This is due to the fact that investigators have first discovered a predicate crime and an allegation of money laundering which is supported by sufficient preliminary evidence.

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