

SOAR Analysis for Audit Dilemmas in Non-Budgeted Cash Grants: A Case Study of East Tanjung Jabung Regency

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ABSTRACT

This study explores the potential for fraud in transactions not directly tied to local government financial mechanisms, with a focus on the mechanism of granting in-kind donations from third parties to local governments. While these donations are formally given as goods, the process involves local governments managing third-party funds to procure the goods for donation. This research aims to address the auditors' dilemma in rationalizing cash donation transactions handled outside the state financial system. This research adopts a qualitative methodology through a case study focused on Tanjung Jabung Timur Regency, drawing on data from the 2023 Audit Report of the Local Government Financial Statements. Using the SOAR framework for analysis, the study finds that cash grants managed outside the regional budget mechanism are still subject to state financial audits. This contributes to addressing the perception among local governments that such funds are excluded from state finances and provides a foundational step for developing audit procedures.

Keywords: Potential Fraud, Cash Grant, State Finance, SOAR.

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1. INTRODUCTION

Based on the 2019 Indonesian Fraud Survey, the government sector ranks among the most affected industries by fraudulent practices in Indonesia, accounting for 33.90% of the total financial losses. Indonesian Corruption Watch (ICW) reported a significant rise in corruption cases, increasing from 279 in 2019 to 579 in 2022. Of these, 303 cases involved budget misuse, resulting in state losses amounting to IDR 17.86 trillion, along with bribery and extortion totaling IDR 49.27 billion, and money laundering reaching IDR 724.28 billion. Other common fraudulent activities include fictitious projects, inflated costs (markups), falsified reports, illegal levies, unauthorized license issuance, and witness manipulation. The motives driving fraud in Indonesia vary widely, encompassing pressure, opportunity, rationalization, capability, and even arrogance (Christian et al., 2023).

In the implementation of government activities, fraud typically occurs through government financial management mechanisms due to weaknesses in the internal control system. The inadequate internal controls within local governments, coupled with insufficient supervision, make them particularly vulnerable to fraudulent practices (Amri & Putri, 2024). Even when fraudulent behavior is not overtly visible, it can still be detected if the financial transactions are processed through the State or Regional Budget frameworks and are classified as part of state financial activities. This is because local government financial transactions, which are part of state finances, are governed by established mechanisms and strictly regulated by applicable laws. Therefore, fraudulent practices can still be traced by following the procedural flow and conducting independent audits. Auditors' capacity to uncover fraud plays a vital role, particularly in recognizing transactions that bypass formal governmental procedures and frequently lie beyond the standard boundaries of audit coverage.

According to the 2023 audit report issued by the Audit Board of Indonesia (BPK) on the financial statements of Tanjung Jabung Timur Regency, the audit opinion provided was Unqualified with an Emphasis of Matter. The emphasis in the audit findings pertains to the receipt of grants, which were formally recorded as goods in-kind (such as building and road construction). However, in substance, the grants were received in cash and managed outside the regional budget mechanism.

During its audit of the Tanjung Jabung Timur Regency Government, BPK encountered a key issue: grants were formally recorded as in-kind contributions based on agreements with third parties, supported by handover reports. However, BPK found that the procurement of these goods involved the local government, which disbursed cash funds for the purchases.

This dual-nature transaction - where a grant appears as goods but involves cash disbursement - created an audit dilemma: should BPK also examine the procurement process?. Interviews with local officials revealed that the government viewed the grants strictly as goods, arguing that procurement responsibilities and funding mechanisms were external and not part of the regional budget (APBD).

The delivery of goods grants through a cash transfer mechanism, managed directly by the government agency, falls into an unusual transaction. This is due to the merging of two grant receipt processes: the formal receipt of goods and the substantive receipt of cash. This merger creates vulnerabilities, as there is no control over the procurement process conducted outside the regional budget mechanism. Furthermore, the initial agreement with third parties specified the grant as goods, not cash, making the process susceptible to rationalization as a fair transaction, despite its irregularities. This lack of oversight increases the risk of misuse.

Based on data on local government grant revenue in Indonesia for 2023, grant revenue was predominantly in the form of goods, compared to cash grants. The overview of grant revenue in Indonesia during 2023 can be described in the figure below.

The significant value of goods in-kind compared to cash grants in Indonesia indicates that receiving goods in-kind is a simpler alternative for both the grantors and local governments, as it only requires a written agreement documented in a Grant Acceptance Report (BAST). In contrast, cash grants involve a more complex process as they need to be budgeted for in advance. Given the high volume of in-kind grants, auditors need to further investigate whether the granted goods come directly from the grantors or involve the local government. If there are indications that the grantor has delegated the authority to the local government to process the procurement of in-kind grants through cash, auditors must assess whether this situation falls within the scope of legality and how to evaluate the rationality of the local government regarding the transaction.

Findings from previous empirical studies, such as those by Budirahayu & Pesudo (2023), reveal that asset misuse by civil servants persists, driven by fraudulent intent influenced by pressure,

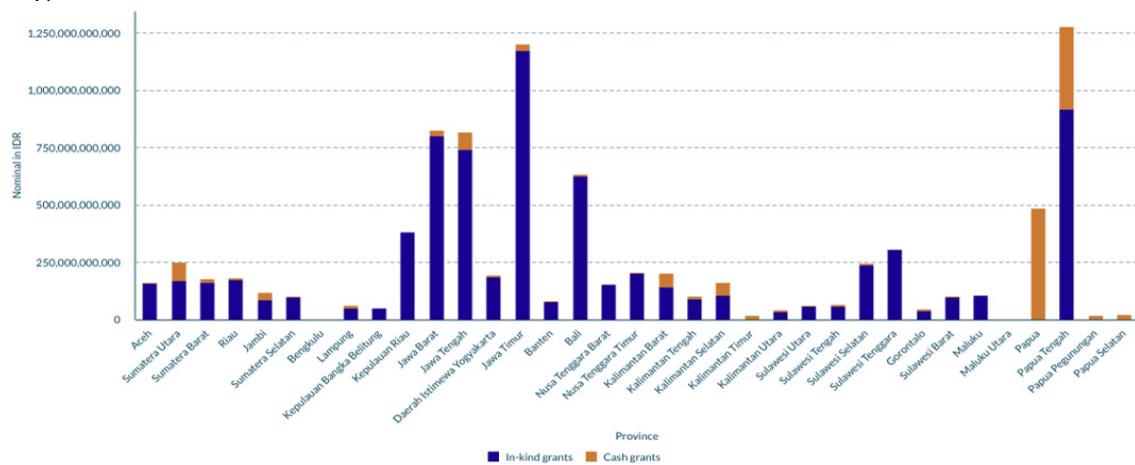
rationalization, opportunity, and capability. This aligns with the broader trend of evolving fraudulent practices in response to the increasing complexity of local government transactions in Indonesia. Consequently, auditors are required to develop advanced competencies to be able to assess such transactions in accordance with prevailing regulations. Supporting this, Rix (2020) conceptualizes the role of forensic accountants as akin to that of physicians—professionals who must conduct thorough diagnostic and analytical procedures to uncover systemic irregularities and their underlying causes.

The objective of this research is to resolve the challenges auditors face when confronted with local government justifications that deem these transactions legitimate. By analyzing the business processes and identifying critical entry points, auditors will be better equipped to confidently assess which areas warrant scrutiny. This understanding will enable the development of more effective audit strategies tailored to these specific circumstances.

2. LITERATURE REVIEW AND HYPOTHESIS

The main theories underpinning this research are threefold: fraud theory, local government budgeting mechanisms, and grant receipts.

Figure 1. Overview of Goods and Cash Grant Revenues in Indonesia for 2023



Source: BPK Audit Report for Fiscal Year 2023

Fraud Theory

According to the Association of Certified Fraud Examiners (ACFE), fraud involves deliberate deception aimed at securing financial or material gain from individuals or organizations, typically carried out by concealing significant information. As outlined in International Standard on Auditing (ISA) 240, fraud refers to a deliberate action carried out by individuals - whether from management, those charged with governance, employees, or external parties - with the intent to deceive and secure an unlawful or unjust benefit. Generally, an indication of fraud is the presence of unlawful actions or violations of existing policies carried out intentionally to gain a benefit. Fraud is fundamentally driven by various motives, one of the most well-known being the fraud triangle as defined by Cressey (1953), which includes financial pressure, rationalization (justifying wrongful actions), and opportunity. In addition, the evolution of fraud theory introduced a fourth element - capability - as a key enabler of fraudulent behavior, complementing the original three factors outlined in the fraud triangle, as proposed by Wolfe and Hermanson (2009) in the fraud diamond framework.

Local Government Budgeting Mechanism
 In accordance with Law No. 17 of 2003 on State Finance, the Regional Revenue and Expenditure Budget (APBD) represents the local government's yearly financial plan. It is formulated in coordination with the Regional House of Representatives (DPRD), ratified through a regional regulation, and serves as a key instrument in managing regional finances. The APBD is composed of three primary sections: projected revenues, planned expenditures, and financing arrangements. Regional revenue includes locally generated revenue, transfer revenue, and other legitimate sources, such as grant revenue. Regional expenditures cover operating costs, capital expenditures, unexpected expenditures, and transfer expenditures.

The preparation of the regional budget reflects the administrative priorities of the local government and its fiscal capacity, and is structured in alignment with the regional development plan to support the attainment of national goals. In practice, regional revenues and expenditures are managed following regional budget policies, specific regulations governing each revenue and expenditure category, and accounting policies related to financial reporting. To uphold accountability, local governments are obligated to prepare and submit financial statements detailing the execution of the regional budget to the DPRD. These financial reports must then be audited by BPK within six months following the close of the fiscal year. Every financial transaction associated with the regional budget, whether on a cash or accrual basis, are governed by transparent and legal mechanisms, ensuring that each transaction is properly accounted for, particularly in audits conducted by BPK.

Grant Revenue

In the Local Government Financial Report, grant income is recognized as a component of regional revenue, classified under the category of other legitimate local income, typically characterized as non-recurring and supplementary in nature within the local government's fiscal structure. Grants received by local governments may take the form of cash, goods, or services. In accordance with Government Accounting Standards as detailed in Technical Bulletin No. 13 on Grant Accounting, grants in cash are recognized in the Budget Realization Report (LRA), while grants in the form of goods or services - recorded on an accrual basis - are reported in the Operational Report (LO). Cash grants are recorded in the APBD when the funds are received by the local government or deposited into the Regional General Treasury Account. Conversely, In-kind grants, such as goods or services, are recognized in APBD upon receipt, with the handover minutes serving as the official documentation for accounting and reporting purposes.

3. METHODS

This research adopts a descriptive qualitative methodology through a case study centered on Tanjung Jabung Timur Regency, drawing upon data sourced from the 2023 fiscal year audit report issued by BPK. The issue will be presented using Business Process Modeling. Business Process Modeling can aid in elucidating processes, actions, and activities, including external process activities within an organization (Novian et al., 2022), thereby allowing for a comprehensive explanation of business processes involving external elements. Based on the analysis of these business processes, the study will identify:

- a. Whether the scope of non-budgeted cash grants falls within the examination scope;
- b. How to address the local government's rationalization that considers non-budgeted cash grants transactions as ordinary transactions under the authority of third parties, thus excluding them from the examination scope;
- c. What audit steps can be taken regarding transactions involving grants with dual transactions?

To respond to these challenges, this study utilizes the SOAR framework - comprising Strengths, Opportunities, Aspirations, and Results - as an analytical tool. This approach emphasizes positive dimensions by identifying core strengths, envisioning future possibilities, and aligning aspirations with impactful outcomes to formulate strategic directions (Fajrin & Nawangsari, 2023). The analytical framework is illustrated in the following

diagram.

4. RESULTS AND DISCUSSION

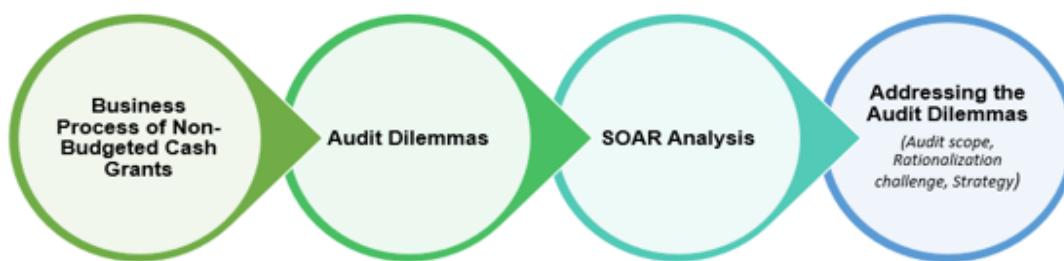
Results

Business Process of Non-Budgeted Cash Grants in Tanjung Jabung Timur Regency

According to the audit findings presented in the 2023 Fiscal Year Audit Report (LHP) for Tanjung Jabung Timur Regency, it was identified that the local government had established a grant agreement with an oil management company operating within the region. The agreement stipulated a goods grant, specifically for the construction of buildings and roads. Following the agreement, the grantor entered into a self-management contract with the regional government, facilitated through its local agencies, to execute the construction of the aforementioned buildings and roads. The grantor provided the regional government with cash funds to carry out the construction projects. To manage these funds, the local agency established a holding account in the name of the regional government; however, this account was not formally designated as an official government account through a decree issued by the Head of the Region.

Subsequently, the local agency appointed contractors to execute the construction of the buildings and roads. Payments to the contractors were disbursed in several installments by the local agency. Upon completion of the construction, the grantor would inspect to ensure compliance with the agreed-upon specifications. Once verified, the goods would be formally handed over to the regional government through a Grant Handover Agreement.

Figure 2. Research Design Framework



The business process can be modeled as follows in the figure 3.

In the identified business process, two distinct transactions are observed:

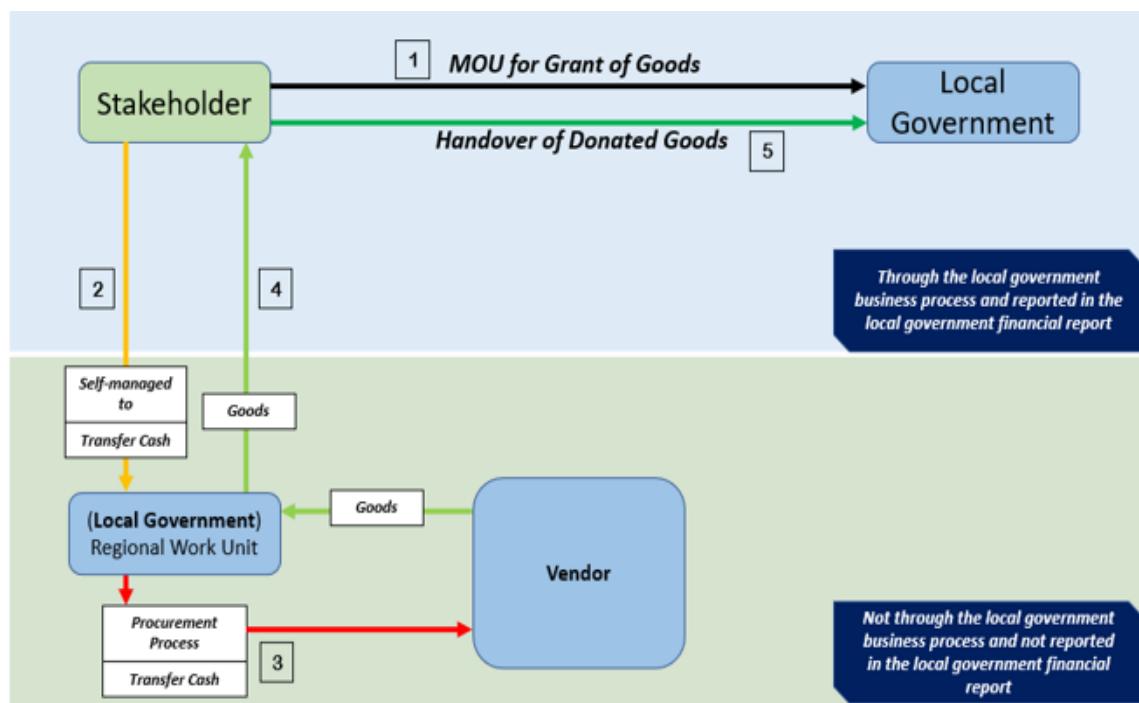
- a. The regional government receives a grant in the form of goods from a third party, which is subsequently recognized as grant revenue in the Statement of Operations of the regional government; and
- a. The regional government, through its respective agencies, undertakes the procurement of goods and services using cash funds provided by the grantor.

From the perspective of the regional government's business process, no issues arise, as the grant received is under the agreed terms and the Grant Handover Document. However, an unusual transaction is identified in the involvement

of the regional government in managing cash funds related to the goods in-kind. Specifically, the regional government, through its agencies, received cash from the grantor and conducted procurement activities outside the official regional budget mechanism.

The management of these cash funds, the procurement process, and the execution of the project outside the APBD framework - culminating in the completion of goods to be handed over to the regional government - constitute unusual transactions. These transactions are prone to fraudulent practices, as none of the activities are recorded in the regional government's financial records. Furthermore, the cash funds being managed are third-party funds, not those of the regional government, thereby increasing the risk of irregularities.

Figure 3. Diagram of the Goods Grant Business Process Executed Through a Cash Grant Process



1. The process of agreeing on grants in the form of goods to local governments;
2. Stakeholders give authority to the regional work unit to carry out the procurement process as well as provide cash funds;
3. Procurement Process;
4. The project has been completed;
5. Handing over the grant items to the local government and recognizing them in the regional budget.

Based on the fraud theory approach, particularly in terms of rationalization, the regional government's rationalization is that the cash funds in question are considered to be the grantor's funds and not part of the regional budget, with the management of these funds being directly mandated by the grantor. In this context, the auditor's scope is limited to the area of grant revenue in the form of goods that have entered the government's financial system, while the cash funds, which are managed in an opaque manner, fall into a gray area for the auditor's review.

SOAR Analysis for Addressing Audit Dilemmas

Auditors may encounter a dilemma when faced with situations where transactions are formally valid but have the potential for fraud behind the scenes. In the present case, a grant was officially provided by the grantor to the regional government, initially agreed upon in the form of goods. However, during the process, the grantor subsequently requested that the regional government handle the procurement process. The challenge lies in the regional government's rationalization, which considers the business process to be correct by asserting that the grant of goods follows the established grant mechanism, while the cash used for procurement is deemed a separate matter, executed outside the APBD mechanism. This rationalization complicates the audit process and hinders the auditor's ability to further investigate potential fraud. To address this dilemma, the author employs a SOAR analysis approach. The outcomes of the SOAR analysis are summarized in the table 1.

Drawing from the SOAR analysis results outlined above, several actionable strategies have been identified, including:

Strength - Aspiration Strategy (SA)

This strategy illustrates the optimal utilization of institutional strengths to achieve defined goals. In line with Law No. 17 of 2003 on State Finances of the Republic of Indonesia, one of the components

of state finances includes third-party assets under government control, which are used to carry out governmental duties and serve the public interest. Furthermore, Government Regulation No. 12 of 2019 concerning Regional Financial Management emphasizes that revenues collected by regional apparatuses must not be directly allocated to expenditures. This provision upholds the principles of fiscal discipline and accountability by ensuring that all financial transactions are processed through the established budgeting framework. In light of this legal framework, wherein state finances are subject to audit by the BPK, auditors are fundamentally positioned to conduct detailed examinations regarding the management of grant funds. This is pertinent when grant income is formally received in the form of goods but substantively as cash, which is managed by regional entities outside the APBD mechanism. The cash from the grant provider has effectively transitioned to the regional government or is under its control, thus becoming part of the regional device's revenue to supply grant goods to the regional government.

Opportunity-Aspiration Strategy (OA)

This strategy outlines how opportunities, ideas, and various possibilities can be leveraged to achieve goals, aspirations, and expectations. With the understanding that the management of grant funds, which are formally received in the form of goods but substantively provided as cash managed outside the APBD mechanism, falls within the scope of state finances, auditors can address the local government's rationalization that such matters are outside the audit scope. The auditor can then proceed to conduct the audit by established criteria. The audit process may involve reviewing procurement practices in accordance with Presidential Regulation No. 12 of 2021, which amends the earlier framework on government procurement to enhance transparency, efficiency, and inclusivity - particularly for micro and small

enterprises. Additionally, the acceptance of grants is governed by Government Regulation No. 10 of 2021, which outlines the procedures for managing foreign loans and grants to ensure accountability and alignment with national priorities. In the initial phase of the audit, the auditor must identify the nature of the grant and the method by which it is provided by the third party. If the grant is agreed to be in the form of cash, the auditor must verify that it has been properly budgeted for in the APBD. Conversely, if the grant is provided in the form of goods, the auditor needs to ascertain whether the procurement process was carried out by the grant provider or involved government intervention. Should there be government involvement in the

procurement of the goods to be granted, the auditor must ensure that the procurement process adheres to regulations and that the quality of the goods meets the agreed standards.

Strength - Result (SR)

This strategy illustrates how the existing strengths can achieve the expected outcomes. In this context, BPK is legally mandated to conduct audits within the domain of state finances, including grant-related transactions involving asset control by local governments. This authority is grounded in Law No. 15 of 2006 on the Audit Board, which empowers BPK to audit the management and accountability of state finances at both central and regional

Table 1. SOAR Analysis Diagram for Unbudgeted Cash Grants

	SO Strength (S)	Opportunities (O)
AR		
Aspiration (A)	<p>Legal foundation based on regulations related to grants, goods in-kind, and State Finances and Regional Financial Management.</p> <p>SA</p> <p>The auditor can determine whether non-budgeted cash grants fall within the examination scope, address the local government's rationalization of cash grant management as ordinary third-party activities excluded from scrutiny, and establish appropriate audit steps for transactions involving grants with dual aspects.</p>	<p>Mechanisms for cash procurement processes are already regulated.</p> <p>OA</p> <p>Auditors can leverage existing audit procedures and/or adapt them to align with the specific criteria and aspects pertinent to the management of grant funds associated with unusual transactions.</p>
Result (R)	<p>SR</p> <p>The auditor is authorized to scrutinize transactions involving in-kind grants that also include unbudgeted cash grants, which present a significant gray area or dilemma within the auditing process, while also identifying potential fraud, if any.</p>	<p>OR</p> <p>Examination based on legal standards.</p> <p>The auditor can assess discrepancies that occur in the event of non-compliance or potential fraud.</p>

Source: Data Processed

levels. Since the grant process falls under the category of state finances, all grant processes, including procurement, must adhere to the established legal framework. The auditors conducting these audits essentially have sufficient legal authority to test compliance with the implementation of the grants. Therefore, the audit findings, including any indications of fraud discovered during the audit process, can be accounted for and further processed in the legal domain if necessary.

Opportunity - Result (OR)

This strategy illustrates how existing opportunities, ideas, and chances can achieve the desired outcomes. All transactions conducted within the scope of local government essentially have detailed technical provisions. The process of granting goods, where the cash funds are managed by the local government, is subject to the provisions of the transactions because the grant process falls under the category of state finances, which are also subject to audit. Auditors can use all related provisions to examine the grant process, starting from the transfer of funds to the local treasury, the procurement process, as well as the quality and quantity of the goods received. This allows auditors to identify whether any processes were not carried out according to the provisions or if there are indications of fraud. The findings from the audit can certainly be used to evaluate the internal control system of the local government, including safeguarding state assets if fraud is detected.

DISCUSSION

This study offers a nuanced approach to identifying audit issues in grant transactions within local governments, particularly those categorized as unusual or non-standard. These transactions, which often involve a blend of in-kind contributions and underlying cash flows, challenge conventional audit procedures and highlight the need for adaptive audit methodologies. By focusing on such atypical cases, the study contributes to the

growing body of literature on public sector auditing and fraud detection.

Theoretically, this research deepens the understanding of the rationalization component within the fraud diamond framework (Wolfe & Hermanson, 2004), illustrating how actors justify irregular practices under the guise of procedural ambiguity or third-party involvement. This insight is particularly relevant in the context of local government, where accountability mechanisms may be weaker and oversight fragmented.

Although the study employs a single-case design, its descriptive richness provides valuable insights into the dynamics of grant-related transactions. These findings can inform auditors in refining their technical procedures, especially in identifying red flags and audit dilemmas that arise when formal documentation does not fully reflect the economic substance of a transaction.

Moreover, the implications extend beyond the public sector. Similar schemes - such as grants between private entities or from government to private organizations - may exhibit comparable characteristics. As such, public accounting firms and forensic auditors can adopt the analytical lens presented in this study to enhance fraud risk assessments in analogous contexts.

Nonetheless, the study is not without limitations. Its regional focus may constrain generalizability, and further research is needed to test the applicability of these findings across different jurisdictions and governance structures. Future studies could employ comparative case analyses or mixed-method approaches to validate and expand upon the patterns identified here.

5. CONCLUSION

Auditors must rigorously address grants received through both cash and in-kind processes. Local governments formally may receive in-kind grants but also manage cash for procuring these goods. While goods in-kind are documented, cash grants

often leave no trace, increasing the risk of fraud, as these transactions fall outside the APBD mechanism, which is subject to regular audits. The local government rationalizes this by asserting that the funds belong to the grant provider and that the agreement pertains to goods, not cash. This creates a dilemma for auditors regarding the audit scope of these non-budgeted cash grants. The legal foundation for auditors is established through the provisions of Law No. 17 of 2003 on State Finances and Government Regulation No. 12 of 2019 concerning Regional Financial Management. These legal instruments confirm that a fundamental element of state finances includes assets that, while legally owned by third parties, are under government control for the purpose of fulfilling administrative responsibilities and advancing the public interest. In addition, they stipulate that revenues received by regional entities cannot be directly allocated for expenditures. With this legal basis, auditors are empowered to conduct comprehensive examinations of non-budgeted cash grants, including testing fund flows, verifying goods, and assessing procurement processes. Given that this study focuses solely on addressing audit dilemmas in finding rationalization answers, describing potential fraud gaps, and audit procedures that can be implemented by auditors for unusual grant transactions, this research has the potential for broader exploration. This is particularly relevant as the study is currently limited to a single entity with the characteristics of a local government and does not describe the real-world implications of fraudulent practices in such transactions.

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