

The Effectiveness of the notary roles as gatekeeper in submitting suspicious financial transactions to PPATK after the enactment of pp number 43 of 2015

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Abstract

This article aimed to identify and analyze the statutory regulations regarding the effectiveness of the notary roles as gatekeeper in submitting suspicious transactions to the Financial Transaction Reports and Analysis Center (PPATK) after the enactment of Government Regulation Number 43 of 2015. The subsequent studies aimed to determine and analyze the obstacles in the implementation of notaries' position related to the submission of suspicious transactions to the Financial Transaction Reports and Analysis Center (PPATK) after the enactment of Government Regulation Number 43 of 2015 concerning Reporting Parties in the Prevention and Eradication of Money Laundering. The study employed descriptive socio-legal studies. Data collection techniques used literature study and field studies through sample interviews. The results showed that notaries as gatekeepers were often used to commit money laundering. Through Government Regulation Number 43 of 2015 concerning Reporting Parties in the Prevention and Eradication of Money Laundering from a practical point of view, it has not been appropriately implemented by notaries. There was no strict sanction from the Financial Transaction Reports and Analysis Center (PPATK), which made notaries reluctant to report suspicious financial transactions. The notaries registered for GRIPS were still very few with the total number of notaries in Indonesia. GRIPS, as a tool for reporting, was not well understood and was rarely used. Up to now, PPATK has not received any reports regarding suspicious financial transactions. The conclusion of this study showed that the notaries' of as gatekeepers in submitting suspicious financial transactions to PPATK have not been effective in preventing the Money Laundering because, in practice, there were still many obstacles that caused notaries not to report to PPATK.

Keywords: notaries, gatekeeper, legal effectiveness, suspicious financial transactions, money laundering

1. Introduction

Along with the development of legal dynamics in Indonesia, Law is born to regulate the development of new types of crimes. The new crime also uses the services of a notary to obtain legal certainty. One of the crimes currently developing in Indonesia is Money Laundering.

In the practice of money laundering, they use a variety of methods and techniques, such as those applied by money launderers in the banking and non-banking sector using professional facilitators, the establishment of fake companies, investing in real estate, purchasing insurance products and securities companies, as well as the misuse of government facilities. (Sutan Remy Sjahdeini, 2004: 128-138) ^[13]

As a phenomenon that relates especially to the world of a crime called "organized crime", it turns out that there are certain parties who benefit from money laundering without realizing the impact of the losses caused. (Ramelan, 2008: 23) ^[7].

Based on the definition contained in Law No. 8 of 2010 concerning the Prevention and Eradication of Money Laundering, the government makes changes to prevent the money laundering by using the active approach of parties who are directly related to the perpetrator or parties that can be used as a medium for criminal acts. The supervisory approach is also carried out with the establishment of a Supervisory and Regulatory Agency (LPP) which has an

important role in the coordination function of the PPATK. (Go Lisanawati, 2019: 30) ^[3]

In order to implement the provisions of Article 17 Paragraph (2) of Law Number 8 of 2010 concerning the Prevention and Eradication of Money Laundering, the President Joko Widodo signed Government Regulation Number 43 of 2015 on June 23 2015 concerning Reporting Parties in the Prevention and Eradication of Money Laundering. Under this government regulation, Reporting Parties are required to submit Suspicious Financial Transaction reports to the Financial Transaction Reports and Analysis Center (PPATK) for the benefit of or for and on behalf of Service Users regarding several matters such as purchasing and selling of property, management of money, securities, and/or other financial service products, management of current accounts, savings accounts, deposit accounts, and/or securities accounts, operation and management of companies; and/or the establishment, purchasing and selling of property of legal entities.

A service user who has the potential to assist in carrying out the money laundering is called Gatekeeper. Gatekeeper is a professional profession in its field and understands manipulation techniques so that money launderers use it to commit their crimes by making it appear as if the action is legal in the eyes of the law. (M. Arief Amrullah, 2015: 86) ^[6]

Regarding service users who are ordered by the government

to become Reporting Parties, they are required to submit Suspicious Financial Transaction reports to the Professional Financial Transaction Reports and Analysis Center as stipulated in the Republic of Indonesia Government Regulation Number 43 of 2015 concerning Reporting Parties in the Prevention and Eradication of Money Laundering, as one of the gatekeepers whose profession is vulnerable to being exploited by the perpetrator of money laundering, then the Notary is included as the reporting party.

Notaries are negligent because their services are used by service users to commit a criminal law or there is a notary who deliberately helps the process of a criminal law related to deed in accordance with their authority. The risks that will be faced are not only with criminal law but also an impact on the decline in the credibility and honor of the profession as a whole (Andi Muhammad Rahmat, 2019: 104) ^[2]. Law enforcement against the money laundering must be supported by all government agencies such as cooperation and mutual transparency, and improve coordination by creating an integrated system with each other. (Abi Hussein, 2015: 9) ^[1]

Basically, notaries, based on their oath of office, are obliged to keep everything they know the secret, even if there are things that are not included in the deed. With these obligations, notaries are not given the freedom to provide information on the deeds they have made (Sjaifurrachman and Habib Adjie, 2011: 253) ^[9]. Notaries, in carrying out their duties and positions, strictly adhere to the Law on the Position of Notary Public and the Code of Ethics for the Position of a Notary. The current Code of Ethics is the Code of Ethics for Notaries of the Indonesian Notary Association based on the Extraordinary Congress in Banten 2015 and Law Number 2 of 2014 concerning amendments to Law Number 30 of 2004 concerning the Position of Notary, which is related to Notaries who are obliged to maintain the confidentiality and all information obtained in the performance of his office.

In this matter, a conflict both legally and according to the meaning of the practice of notaries' law appears. The Law Number 8 of 2010 concerning PPTPPU with its implementing regulations, namely Government Regulation Number 43 of 2015 concerning parties who report PPTPPU members of the profession including the position of Notaries are obliged to report suspicious financial transactions if the Notaries, in the use of their services, indicate suspicious financial transactions by their clients. On the other hand, the notaries must also maintain the confidentiality of the client itself.

For the sake of legal certainty, the two regulations must be carried out jointly, not only the money laundering regulations should be carried out, but the Law on the Position of Notary as well. Thus, for the sake of legal certainty, notaries may not leak any deeds they have drawn unless they find indications of a criminal act of laundering. (Kartina Pakpahan, Maggie, Christian Agung Prawito, Wico Dwi Pratama, 2020: 3) ^[4]. It is also a big hope for the government if notaries carry out their role as gatekeepers in preventing money laundering. Therefore, this is interesting to be researched and examined by the author in writing this law. Of the two conflicting rules above, it must run simultaneously so that the objectives of each regulation can be achieved without violating one of the regulations and their implementation can run well in order to provide legal

certainty to achieve legal objectives in the event of a legal dispute.

2. Research Methods

In writing this thesis, the researcher employed empirical legal research. Empirical legal research is an approach carried out by field research with observing what is happening in the field, and the application of these regulations in practice in society (Soerjono, Soekanto and Sri Mamudji, 2006: 12) ^[10]. This study still relied on normative premises so that in exploring and analyzing, it can be taken from statutory regulations to be seen in the facts in the field. The characteristics of this study were described descriptively. The data analysis technique was done by processing the data that has been obtained, both primary and secondary data. Then, the data was processed and analyzed in a qualitative descriptive by using an empirical legal approach.

3. Finding and Discussion

1. The Obligations of Notaries to implement the Anti-Money Laundering Program

a. The Implementation of the Principles for Recognizing Service Users (PMPJ)

The obligation to implement PMPJ by professionals is guided by Article 18 of the TPPU Law, Article 4 of PP. 43 of 2015 and the provisions of the Principles for Recognizing Service Users (PMPJ) established by the Supervisory and Regulatory Agency (LPP), which at least contain:

1. Service Users Identification is carried out through the collection of service user information and documents.
2. Service Users Verification is carried out to examine information and documents provided by service users and may request additional information through direct meetings with these service users.
3. Service User Monitoring is carried out in order to determine the suitability of transactions made with the service user profile.

The Ministry of Law and Human Rights (Kemenkumham) as the government agency that houses the notary profession issues a circular number AHU.UM.01.01-1232 on Guidelines for the application of the principle for recognizing service users for notaries. The circular letter aims to guide notaries in the PMPJ in order to achieve a comprehensive PMPJ implementation for notaries in preventing and eradicating money laundering.

Generally, Notaries can already understand about PMPJ because this is directly related to their job roles as a notary. Notaries have begun to take precautionary steps (awareness), where the notary does not directly report such as a report to the PPATK but the notary chooses service users who come to their office and refuse if they have the potential to commit TPPU.

According to PPATK observations, the Notaries take precautionary steps if they encounter the following cases:

1. The market value of land with the transaction value is not suitable, or the transaction is significantly below the market price.
2. Not willing to provide complete and clear information about PMPJ.
3. Using large amounts of cash transactions to avoid evidence of transactions in banking.

In conducting PMPJ, notaries must take steps to apply PMPJ and must be done at the time of their work, namely as follows:

1. Identification of notary services used by service users
PMPJ is applied if a notary provides services such as preparing and conducting transactions for the benefit of or for and on behalf of service users regarding:
 1. Purchase and sale of property
 2. Management of money, securities and/or other financial service products
 3. Management of current accounts, savings accounts, time deposits accounts, and/or securities accounts
 4. Operation and management of the company, and/or
 5. Establishment, purchase and sale of legal entities.

The implementation of PMPJ regarding the purchase and sale of the property is carried out when the notary has a business relationship with the service user. In the purchase and sale of the property, there is a financial transaction with a value of at least IDR 100,000,000 (one hundred million rupiahs). Moreover, the Notary has doubts about the accuracy of the information reported by service users to allow suspicious financial transactions related to Money Laundering (ML).

2. Communicate with service users
 1. The notary communicates to service users and informs that there will be information needed by the notary in the framework of identification and verification of service users based on Regulation of the Minister of Law and Human Rights number 9 of 2017 concerning the implementation of the principle for recognizing service users for notaries.
 2. The notary ensures the position of the service users who conducts transactions with the notary acting for himself or the beneficial owner. The beneficiary in this case means:
 1. It has the right to certain benefits related to service user transactions, either directly or indirectly.
 2. It is the true owner of assets related to service user transactions.
 3. Controlling service user transactions
 4. Providing power of attorney to make transactions
 5. Controlling the corporation
 6. It is the ultimate control for transactions conducted through a legal entity or based on an agreement.
1. Notaries must understand the profile, purpose and objectives of the business relationship, as well as transactions conducted by service users.
2. If the service user refuses to apply PMPJ, then the notary is obliged to do so.
 1. Terminating business relations with service users
 2. Reporting to the PPATK at the latest 3 (three) days since the notary has terminated the business relationship with the service user.

In its implementation, PMPJ has not been carried out correctly and based on the Ministry of Law and Human Rights (Kemenkumham) circular. The process of identifying service users has not been carried out uniformly. In fact, if the notary has implemented the PMPJ correctly and in accordance with the Ministry of Law and Human Rights (Kemenkumham), then the notary is automatically protected

by the State through law. The procedures that have been stipulated in a circular letter are not easy for notaries to do because as a notary, they must respect clients. Therefore, the notaries find it difficult to ask the identity of service users such as knowing the source of funds obtained in carrying out 5 (five) types of activities that require notaries to implement PMPJ.

- b. The Submission of Suspicious Financial Transaction Reports (LTKM) to PPATK.

A notary is obliged to report to PPATK if: *first*, the notary breaks the business relationship with the service user because the service user refuses to follow PMPJ procedures. *Second*, the notary doubts the accuracy of the information conveyed to service users. *Third*, stop the application of PMPJ on the basis that the notary believes that the implementation of the principle of recognizing service users carried out will violate the provisions of his profession. *Fourth*, suspicious financial transactions from service users are identified.

Based on article 1 paragraph 5 of the TPPU Law, the Suspicious Financial Transactions means:

1. Financial Transactions that deviate from the profile, characteristics, or habits of the Transaction pattern of the relevant Service Users;
2. Financial Transactions by Service Users that are reasonably suspected of being carried out to avoid reporting of the Transaction concerned which must be carried out by Reporting Parties in accordance with the provisions of this Law
3. Financial Transactions conducted or cancelled using Assets suspected to be the proceeds of criminal acts;
4. Financial Transactions requested by the PPATK to be reported by Reporting Parties because they involve assets alleged to be the proceeds of criminal acts.

In submitting suspicious transaction reports to PPATK as regulated in Article 8 paragraph (1) PP No. 43 of 2015 which mentions that Profession must submit a Suspicious Financial Transaction report to PPATK for the benefit of or for and on behalf of the Service Users if the service user does the following 5 (five) things:

1. Purchasing and selling of property;
2. Management of money, securities, and/or other financial service products;
3. Management of current accounts, savings accounts, time deposits accounts, and/or securities accounts;
4. Operation and management of the company; and/or
5. Establishment, purchase and sale of legal entities.

To be able to report to PPATK, the notary must first register with the Gathering Report Information Processing System professional reporting application or abbreviated as GRIPS. GRIPS is a web-based software provided by PPATK for the notary profession to register as a reporting party and carry out reporting obligations to PPATK.

Based on the data obtained from PPATK, it found that until January 2020, there are still many notaries who have not registered themselves, either individuals or corporations, on the GRIPS application. The data of notaries in several regions registered for GRIPS until December 2019 can be seen in the following table:

Table 1: The data of notaries of several regions registered for GRIPS

Name of Regions	Total of Notaries	The total of notaries registered for GRIPS
Central Java	2269	1492
East Java	2191	1538
DKI Jakarta	974	667

Table 2: The data of notaries registered for GRIPS in Indonesia until January 7, 2019

The total of notaries registered for GRIPS	The total of Notaries registered for the Ministry of Law and Human Rights
484 notaries	17.856 notaries

There are still many notaries who have not registered for GRIPS due to a lack of understanding of the notaries regarding the importance of GRIPS. So far, activities involving PPATK, Ministry of Law and Human Rights (Kemenkumham) and INI are still not optimal, and there is still a shortage of time in order to socialize the role of the Notary in reporting suspicious financial transactions.

In a vulnerable period of 3 (three) months, PPATK received thousands of suspicious financial transactions reports from the financial industry. However, up to now, no suspicious financial transaction reports have been received from the notary. The reason why notaries do not report suspicious financial transactions to PPATK is the absence of legal protection for notaries when reporting to PPATK.

If the role of a notary as a TKM reporter to PPATK is not implemented properly and effectively, it will be difficult for Indonesia to eradicate ML. An institution cannot work alone without the help of an institution or community or other parties that make a goal to be achieved. Notary as a reporting party whose work is directly related to the mode of criminal offenders to remove traces or change a TPPU to another form, should report to PPATK through GRIPS consistently and apply PMPJ according to the Ministry of Law and Human Rights circular properly and correctly.

2. The Obstacles for Notaries in Submitting Suspicious Transactions to the Financial Transaction Reports and Analysis Center (PPATK)

Currently, the way money launderers use notary services is a way that can or is often used to eliminate traces of money laundering by criminal offenders completely. PPATK emphasizes that currently, the role of gatekeepers which is dominated by profession, especially notaries, is also used by actors to carry out their actions in collaboration with that profession.

In practice, it is not easy for notaries to submit suspicious financial transactions to PPATK. Many obstacles have been encountered so that the notary profession does not report or there is no report submitted to the PPATK from the notary profession regarding suspicious financial transactions. These obstacles are:

a. Notary Professional Ethics

In one case, if it is not a public figure who comes, the notary as a profession who carries out his duties with respect for clients is difficult to ask where the money in the transaction came from. Thus, the notary can be considered wrong, because if the notary has taken material action, the notary is free from legal traps. On the other hand, many parties who turn out to be government officials commit corruption, but the notaries do not know. The notary considers that in the context of PMPJ, it is unethical to ask about the source of funds. Moreover, we as notaries must maintain the dignity

and standard of service users.

The relationship between the notary and the client is a personal relationship, namely the relationship between the subjects supporting the values. Thus, the notary is personally responsible for the quality of services. Personal matters must also fulfil professionalism, where the notary is not entitled to take care of matters outside the interests of the deed. PMPJ activities are important to do, but not by crossing ethical boundaries, such as asking about the background of a criminal act. Therefore, what happens to find out suspicious financial transactions becomes difficult for the notary profession.

b. There is no legal certainty so that it is considered to have violated UUJN

Based on the provisions mentioned above, the most important thing for a Notaries because of their job, dignity or position, is obliged to keep a secret. This indicates that the Notary has no obligation to testify as witnesses, namely in relation to the contents of the deed and information obtained in the implementation of his position. In Article 170 of the Criminal Procedure Code affirms that those who because of their work, dignity or position are obliged to keep secrets, can ask to be exempted from the obligation to testify as witnesses, namely regarding the matters entrusted to them and the judge determines whether or not all reasons for the request are valid.

By reporting suspicious financial transactions to PPATK, the notaries feel that they have violated UUJN. This is because, in the reporting stage, the notaries indirectly provide information provided by clients to other parties. Many notaries do not understand that PP. 43 of 2015 allows the profession to provide information to other institutions if other laws are governing it.

According to Ko Tjay Sing, the profession's obligation to report suspicious financial transactions is included in the Relative secret theory. It is called relative because the secret storage must reveal its secret, if by keeping the secret; interests considered bigger must be sacrificed. Therefore, conflicting interests must be compared with one another. What is considered greater must be protected; others must be sacrificed. (Ko Tjay Sing. 1978: 9) ^[5]

c. Legal protection

Law exists in society aimed at integrating and coordinating interests that can collide with one another. The coordination of these interests is carried out by limiting and protecting these interests. The law protects a person's interests by giving him the power to act in fulfilling those interests. Granting of power, or what is often referred to as this right, is carried out in a measured, broad and deep manner.

One of the keys to the success of the State in preventing and eradicating ML is the participation of the public, especially the reporting party in assisting law enforcement officials. The important role of the reporter in the prevention and eradication of ML should be in line with the legal protections provided by the state. Indirectly, the report provided by the reporter to law enforcement officials is an act that carries great risk to the safety of himself, his family

and his property.

Table 3: The Articles regulating Legal Protection in Law number 8 of 2010 concerning the Prevention and Eradication of Money Laundering

Article 28	The implementation of reporting obligations by the Reporting Party is exempted from the confidentiality provisions applicable to the Reporting Party concerned.
Article 29	Unless there is an element of abuse of power, the Reporting Party, its officers and employees cannot be prosecuted, either civil or criminal, for the implementation of reporting obligations under this Law.
Article 83 paragraph 1	PPATK officials and employees, investigators, public prosecutors, or judges are obliged to keep the Reporting Party and the reporter confidential.
Article 84	Every person who reports a suspected crime of money laundering is obliged to be given special protection by the state from possible threats endangering himself, his life and/or his property, including his family.
Article 85	In court proceedings, witnesses, public prosecutors, judges, and other people related to the crime of money laundering which is currently being investigated are prohibited from mentioning the name or address of the reporter or other things that may reveal the identity of the reporter.

Based on the table above, especially the notary profession will be given full legal protection from the law. It starts from the time of reporting through the GRIPS application to the court later. In every court proceeding, before the court proceeding begins, the judge is obliged to remind witnesses, public prosecutors and other people related to the examination of the case not to mention the name of the reporter so that the reported party will not know the identity of the reporter of the crime.

Lack of socialization from the government, in this case, the PPATK and Ministry of Law and Human Rights (Kemenkumham) fund PP No. 43 of 2015, making notaries understand less about legal protection for reporting parties. The notary considers the report to threaten his profession. Whereas in Law number 8 of 2010 concerning the Prevention and Eradication of Money Laundering, it has actually stipulated complete legal protection for the reporting party.

UUJN itself in Article 66 paragraph (1) UUJN stated that for the benefit of the judicial process, investigators, public prosecutors, or judges with the approval of the Notary Honorary Council are authorized to: Take *minuta* deeds and/or letters attached to the *Minuta* deed or Notary protocol in storage. Notary Public; and Calling the Notary Public to attend the examination related to the Notary deed or protocol in the Notary's storage. The existence of Article 66 paragraph (1) UUJN is a form of legal protection for a Notary if the information is required in examination by investigators, public prosecutors and court judges because without this provision, the Notary cannot provide information relating to deeds drawn up by and before him due to the obligation to deny.

d. Notary is a position of trust

In the field, the problem is the notaries feel that they have not met suspicious service users. This is because notaries apply the principle of trust to their service users. This prevents the notaries from being fixated on suspicions of transactions and because of their professionalism at work, the notaries give trust to service users who come to their office, as long as their identity and formal documents are fulfilled.

Notaries must maintain the trust of notary service users. Therefore, the notary profession is a person who becomes the trust of the community whose position must be upheld. In carrying out its duties, the notary is only obliged to know the formal truth, which is based on the original documents brought when dealing with the notary. Based on this case, the notary is not responsible for the correctness of the

information given to him; the notary is only responsible for the accuracy of the evidence he makes. Identifying suspicious financial transactions carries a moral burden because if it is wrong or true, it will make the notary feel uncomfortable in carrying out his duties.

The notary feels the moral burden because it will be considered that if he reports, he will commit defamation if it is not proven that he has committed ML. PPATK can follow up reported service users and until they are not proven guilty. This gives a loss to the notary if the reported party finds out that the notary who reported and sued either civil or criminal to the notary who reported it.

In order to prevent suspicious financial transactions, by not neglecting the principles of trust, a professional must have a strong personality and have idealism. Providing knowledge and understanding to clients regarding money laundering will have a good impact on the notary itself. The client will be aware of the crime, and the notary has preventive steps that must be taken to the client. Therefore, PMPJ will run well.

4. Conclusion

The Notary's role as gatekeeper in submitting suspicious financial transactions to PPATK has not been effective in preventing the Money Laundering in accordance with the objectives of Government Regulation Number 43 of 2015. With the Notary's obligation to implement the Principle of Recognizing Service Users (PMPJ) in its implementation, it has not been carried out correctly in accordance with the circular Ministry of Law and Human Rights (Kemenkumham). The process of identifying service users has not been carried out uniformly. In fact, if the Notary has implemented the PMPJ correctly and in accordance with the Ministry of Law and Human Rights (Kemenkumham), then the Notary is automatically protected by the State through law. The procedures that have been stipulated in a circular letter are not easy for notaries to do. This is because as a notary, they must respect clients so that notaries find it difficult to ask the identity of service users such as knowing the source of funds obtained in carrying out 5 (five) types of activities that require notaries to implement PMPJ. Furthermore, the obligations of notaries as reporters in its implementation are still many notaries who have not registered GRIPS due to a notary's lack of understanding of the importance of GRIPS. So far, activities involving PPATK, the Ministry of Law and Human Rights (Kemenkumham) and INI are still not optimal, and there is still a shortage of time in order to socialize the role of the

Notary in reporting suspicious financial transactions. Up to now, no suspicious financial transaction reports have been received from the Notary.

The obstacles for Notaries in Submitting Suspicious Transactions to the Financial Transaction Reports and Analysis Center (PPATK) are; *first*, Notary professional ethics which require notaries to act ethically and professionally. *Second*, the notary considers reporting it will violate UUJN. *Third*, there is no legal protection provided for notaries when they report the Money Laundering. *Fourth*, a notary is a position of trust.

5. Suggestions

This study suggests to the government in which the making of Government Regulations will not be effective without socialization and dialogue to the objects of the government regulations, in this case, PP Number 43 of 2015, especially notaries. In the field, many notaries still complain that they do not fully understand the purpose of Government Regulation Number 43 of 2015 and how to implement it. There are still many obstacles that prevent the notary from carrying out its role in reporting suspicious financial transactions to the PPATK. Protection is the most significant factor disclosed by notaries when they do the reporting. Therefore, in this case, the government must provide socialization in order to give explanations and carry out the dialogue so that the obstacles that have been experienced by notaries can be resolved jointly.

There needs to be awareness from notaries about the importance of preventing money laundering, one of them is through suspicious financial transactions using the services of notaries, so that notaries can more actively carry out their role as reporters of suspicious financial transactions to PPATK. Notaries must cooperate with the government, in this case, PPATK and KEMENKUMHAM to be able to realize the goals of Government Regulation Number 43 of 2015 to prevent the money laundering in Indonesia which is still relatively high.

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