



EFFECTIVENESS OF IMPLEMENTATION OF THE PRINCIPLE OF RECOGNIZING SERVICE USERS FOR NOTARIES BASED ON PERMENKUMHAM NO. 9 YEAR 2017 STUDY IN MALANG CITY

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Abstract

The presence of a notary in the midst of society is very important, because a notary can provide guarantees of legal certainty related to making authentic deeds. Notaries are burdened with the obligation to implement PMPJ based on Permenkumham No 9 of 2017. This obligation is borne by Notaries as Reporting Parties in reporting suspicious financial transactions of service users as well as a form of protection for Notaries from the dangers of money laundering and steps to support Government programs in eradicating criminal acts money laundering. However, in implementing this principle there are still several notaries who have not implemented it. The problems studied in this study are related to the effectiveness of the implementation of PMPJ based on Permenkumham No. 9 of 2017 on the authority of Notaries in Malang City. The research method used is socio-legal with a sociological approach or looking at the implementation of norms in the field. The results of the study show that notaries in Malang are still found not to have implemented PMPJ based on Permenkumham No. 9 of 2017, PMPJ is considered a Notary. then the implementation is not effective, even though the legal substance has provided rules, the implementation of this article is hampered by several factors, namely the Notary Factor itself which comes from an internal Notary who does not apply it, does not understand the obligation to implement PMPJ (PMPJ) based on Permenkumham No. 9 of 2017, Inadequate facilities, notary's lack of understanding regarding how to control/use the IT system, and there are no strict sanctions from the Ministry of Law and Human Rights against notaries who do not implement PMPJ.

Keywords: *principles, services, notary, permenkumham no. 9 year 2017*

1. INTRODUCTION

The presence of a Notary in the midst of people's lives has an important meaning in providing guarantees of legal certainty. An authentic deed is proof of the existence of a legal action and the strength of the deed remains legally enforceable even though the Notary who made the deed is no longer active. This causes the notary's position to be very important for the creation of legal certainty and protection for the community. According to GHS Lumban Tobing, there are 2 (two) deed made by a notary, namely a relaas deed and a partij deed, according to GHS Lumban Tobing a relaas deed is a deed that describes authentically an action taken or a condition that is seen or witnessed by the deed maker, namely the notary in carrying out his position. confirmed in an authentic deed. Examples of partij deed, among others: credit agreement. According to R. Soergondo, an authentic deed is a deed made and formalized in legal form, by or before a public official, who is authorized to do so, at the place where the deed was made.

In carrying out his position, a notary is guided by and bound by the rules contained in Law no. 2 of 2014 concerning the Position of Notary, Civil Code, Notary Code of Ethics, and other legal regulations. Regarding his authority, apart from being authorized to make authentic deeds, Notaries also have special powers regulated in Article 15 paragraph (2) UUJN, namely Notaries have the authority to certify signatures and determine the certainty of the date of private letters by registering in a special book; record documents carried by hand by registering in a special book;

make copies of private documents in the form of copies containing descriptions as written and described in the letters concerned; verify the compatibility of the photocopy with the original document; provide legal counseling in connection with the making of the Deed; make Deeds related to land; or create auction minutes. Other authorities of Notaries are also regulated in Article 15 paragraph (3) UUJN. In line with the times and the pace of the economy which continues to grow and develop rapidly in various types of financial transactions which have increased, various business transactions involving the role of a Notary are also increasingly varied, this is due to the need for business people or interested parties to authentic written evidence. However, the Notary must be alert to all forms of transactions that come to him, because sometimes appearers come using suspicious funds with bad intentions. One form of this crime is money laundering. Money laundering is a form of white collar crimes used by perpetrators of criminal acts who want to hide the benefits gained through unlawful activities. Drug dealers and suppliers of counterfeit goods often commit money laundering crimes to hide their source of income.

As a form of preventing and eradicating the crime of money laundering, the Indonesian government together with the House of Representatives has established the Money Laundering Law Number 8 of 2010 concerning the Prevention and Eradication of the Crime of Money Laundering (hereinafter abbreviated as the TPPU Law), State Gazette of 2010 Number 122, which revoked Law Number 15 of 2002 concerning the Crime of Money Laundering, and Law Number 25 of 2003 concerning Amendments to Law Number 15 of 2002 concerning the Crime of Money Laundering. One of the interesting new legal breakthroughs in the PPTPPU Law is the follow the money paradigm. Follow the money is a new paradigm in eradicating crime or a new approach in eradicating ML. Head of Legal Services Erni Mamo Li (30/04/2021) stated that Law no. 8 of 2010 concerning the Prevention and Eradication of Money Laundering (TPPU) and Law no. 9 of 2013 concerning the Prevention and Eradication of Criminal Acts of Terrorism Financing, as a movement to prevent and eradicate anti-money laundering or prevention of terrorism financing is the background for implementing the Application of Recognizing Service Users (PMPJ).

Described in Article 3 PP No. 43 of 2015 concerning Reporting Parties in the Prevention and Eradication of Money Laundering Crimes, including: Advocates, Notaries, Officials for Making Land Deeds, Accountants, Public Accountants and Financial Planners. One of the reporting parties in preventing the eradication of money laundering crimes (TPPU) is a Notary, so this obligation must be carried out by a Notary as an effort to assist the State in preventing and eradicating Money Laundering Crimes. This obligation is carried out when carrying out a business relationship with a Service User, there is a Financial Transaction in rupiah currency and/or foreign currency whose value is at least or equivalent to Rp. 100,000,000.00 (one hundred million rupiah), there is a Suspicious Financial Transaction related to money laundering and terrorism financing crimes, or a Notary doubts the veracity of the information reported by the Service User.

Based on Article 2 Paragraph (2) Regulation of the Minister of Law and Human Rights No. 9 of 2017 concerning PMPJ For Notaries ordering Notaries to implement PMPJ as referred to in Paragraph (1) at least contains: Identification of service users, Verification of service users and Monitoring of service user transactions, but in reality it has not been implemented effectively. based on the results of the researcher's interview with a Notary and PPAT in Malang City, namely the Hospital Notary, he said that he already knew about Permenkumham No. 9 of 2017 regarding the implementation of PMPJ (PMPJ), but according to him to carry out the mandate from Permenkumham No. 9 of 2017 cannot be fully implemented, as in Circular No. AHU. According to



the Notary RS, the Notary has no obligation to go deep into searching for data and prove the material truth of the interests of the appearers. The notary is not burdened with the obligation to check remotely whether the identity card of the person appearing is genuine or fake, whether a person's birth certificate is genuine or fake. Then he added that monitoring service user transactions both electronically and non-electronically could not be realized because notaries were not provided with facilities to access service user transactions that came before a notary only to know their identity, work profile and needs in terms of what would later be checked whether it was classified as in the low, medium or high risk criteria in the PMPJ form in the goAml application.

Based on the description of the problems described above, it is necessary to conduct research on "Implementation of PMPJ for Notaries (Study of Application of Article 2 paragraph 2 of Permenkumham No. 9 of 2017 in Malang City)". Research is important because in addition to showing problems in implementing PMPJ for Notaries, this research will also contribute to improvement in efforts to increase the application of PMPJ. In accordance with the background of the problems that have been described, the author will examine how the effectiveness of recognizing service users is based on Permenkumham No. 9 of 2017 on the authority of Notaries in Malang City.

2. RESEARCH METHODS

The type of research used is socio-legal research. This research was used because it started with legal problems in the field (law in action) and the focus of the study was to measure and analyze the effectiveness of the application of Article 2 paragraph (2) Permenkumham No. 9 of 2017 concerning the Implementation of PMPJ for Notaries and the social sciences approach which explains the relationship between law and society. In addition, studies regarding the application of this article are limited to the implementation of PMPJ for Notaries in Malang City.

3. RESULTS AND DISCUSSION

Financial Action Task Force (FATF) is an intergovernmental body established to set effective standards in efforts to prevent Money Laundering Crimes (TPPU) and Terrorism Financing Crimes (TPPT) and other criminal threats, against the International financial system. Indonesia is a country that was previously blacklisted by the FATF as a country prone to money laundering and terrorism financing, which was revoked from the blacklist in February 2016. Various efforts were made by the Government in terms of fulfilling 40 FATF recommendations and to prevent money laundering crimes. One of the Government's efforts is to issue a regulation regarding the implementation of PMPJ. Apart from being an effort by the Government to prepare Indonesia to become a member of the FATF, the regulation regarding the implementation of the PMPJ is also an effort to prevent money laundering which is an extension of Law No. 8 of 2010 concerning the Crime of Money Laundering.

Referring to Law No. 8 of 2010 regarding the definition of money laundering is a process that has the aim of disguising the source of money or assets obtained from criminal acts that are converted into assets that appear to originate from legal activities. Money laundering is not a predicate crime but rather the aftermath of a crime which has several elements including elements of the original crime which resulted in a crime, elements of an act committed against the proceeds of crime and elements of assets obtained from the proceeds of crime. In order to prevent the crime of money laundering, implementing regulations have been established to regulate parties who are

tasked with reporting money laundering crimes or known as reporting parties as regulated in PP No. 43 of 2015.

Based on PP No. 43 of 2015, Notaries along with other professions such as advocates, PPAT, accountants, public accountants and financial planners are given the obligation to report suspicious financial transactions that lead to money laundering to PPATK (Financial Transaction Reporting and Analysis Center) in the form of implementation PMPJ. The purpose of appointing a Notary as one of the reporters in submitting suspicious financial transaction reports to PPATK is as a policy to stop the abuse of Notary's authority related to keeping the contents of the deed confidential which is often used by perpetrators of money laundering crimes. PMPJ is a principle that must be applied by a group of professionals who are classified as reporters in the prevention and eradication of money laundering crimes that must be submitted to PPATK, as an independent institution established in the context of preventing and eradicating money laundering crimes. In addition, PPATK plays an important role in the process of eradicating money laundering crimes, if PPATK does not carry out its functions properly, the effectiveness of the implementation of the Law on money laundering crimes will not be achieved.

From the results of research conducted at the Notary Office of Malang City. The author found various answers regarding perceptions or experiences regarding the application of PMPJ for Notaries based on Permenkumham No. 9 of 2017. Based on the results of the interviews that have been conducted, the writer obtained from the Malang City Notary a total of 16 answers or responses with the following details:

Table 1 Distribution of Notary Sources in Malang City

Number of Notaries in Malang City	Number of Samples	Number of Responses	Unresponsive	%
158	22	16	6	10.1%

To find out the "perception" or knowledge of Notaries in Malang City regarding Article 2 paragraph (2) Permenkumham No. 9 of 2017, the author in this case asks a question to the Notary with the question "Do you know that a Notary has an obligation to implement PMPJ which contains at least: Identification of Service Users, Verification of Service Users and Monitoring of Service User Transactions?". To find out the answer, the following will be presented in tabular form:

Table 2 Knowledge of Notaries in the Malang City Region about Notaries must apply PMPJ based on Article 2 paragraph (2) of Permenkumham No. 9 of 2017

Malang City Notary	Number of Samples	Number of responses	Know	No
158	22	16	7	9

If you look at the table above, compared to those who know more Notaries do not know about the obligation to apply the principle of analyzing service users based on Permenkumham No. 9 of 2017, namely if the percentage in this case is 43.75%. While those who know amounted to 56.25%. even so, in practice there are also Notaries who already know about the contents of the PMPJ obligations but have not implemented them. This will be explained in the next table.



After exploring perceptions, a question was then asked about "experience" whether the Notaries interviewed had ever implemented PMPJ which contained at least identification, verification and monitoring of service user transactions. The amount of data found is as follows:

Table 3 Experience of Notaries in Malang City in implementing PMPJ includes identification, verification and monitoring of service user transactions based on Article 2 paragraph (2) of Permenkumham No. 9 of 2017

Malang City Notary	Number of Samples	Number of Responses	Once	No
158	22	16	3	13

The table above shows a significant discrepancy, if the percentage is a total of 81.25% of Notaries who have never implemented PMPJ for Notaries based on Article 2 paragraph (2) Permenkumham No. 9 of 2017 which contains at least identification, verification and monitoring of service user transactions. This number shows that although in terms of perception 43.75% of Notaries know, only 18.75% of their experience admit that they have applied it. At least notaries who have used this instrument show that Article 2 paragraph (2) of Permenkumham No. 9 of 2017 proved to be little known and implemented effectively in implementing PMPJ for Notaries in Malang City.

3.1 Testing the Effectiveness of Article 2 paragraph (2) Permenkumham No. 9 of 2017 Between Theory and Practice

Basically the answer to the effectiveness of Article 2 paragraph (2) Permenkumham No. 9 of 2017 it can be seen after seeing the research findings from a sample of Notary Offices in Malang City, that it can be concluded that the a quo article is not working effectively for several reasons. However, these answers still have low validity because these findings have not been tested/verified with theories or legal norms. The legal effectiveness test is a scientific assessment regarding the application of a legal activity. The testing tools used in the context of this legal research are legal theories that are considered relevant to answering problems. The relevant legal theory as a test tool in this case is of course the "legal effectiveness theory". To assess the effectiveness of a legal activity, Lawrence M. Freadman has provided a theoretical construction in the form of a legal system. That to assess the effectiveness of legal activities can be seen from the sub-systems consisting of legal substance, legal structure and legal culture. According to Freadman, the operation of the law is said to be effective if these elements run coherently and optimally.

Even though it has been explained in theory about the concept of each sub-system, the author's view is that it is still not applicable as a test or analysis tool. For this reason, the author in this case tries to make indicators by elaborating the concepts of the subsystems that have been described by Freadman. This indicator of legal effectiveness has been conveyed by the author in explaining the operational definition of the research method. This indicator will be used to test or assess the effectiveness of Permenkumham No. 9 of 2017 in the Malang City Notary Office area.

Based on the research findings that have been previously described which consist of findings from the experiences of Notary/PPAT Offices in the Greater Malang area. If these findings are related to indicators of legal effectiveness, it can be described as follows:

Table 4 Legal Effectiveness Article 2 paragraph (2) Permenkumham No. 9 of 2017 concerning the Implementation of PMPJ at the Malang Notary Office

No.	Component	Parameter	Effective
1.	Legal Substance	1. Is there adequate legal regulation?	Yes
		2. Is the content or meaning of the rules easy to understand?	Yes
		3. Is the rule of law arranged systematically and synchronously?	Yes
		4. Does the rule of law form an administrative mechanism?	Yes
		5. Does the general public know the contents of the regulations in question?	No
		6. Is there an administrative mechanism that is accessible and can be carried out by every member of the community?	No
2.	Legal Structure	1. Does law enforcement know the contents of the regulations in question?	Yes
		2. Are the rules in question enforced by law enforcement?	No
		3. Is the application of the law in accordance with the rules in question?	No
		4. Are there any obstacles to the application of the law related to the regulations in question?	Yes
3.	Legal Culture	Is there an acknowledgment and a general acknowledgment among the public that the rule of law and legal institutions are indeed effective?	No

First, in terms of legal substance or legal regulations, adequate legal regulations are available, namely Permenkumham No. 9 of 2017 This means that the implementation of PMPJ for Notaries has been fulfilled because the legality of the norms is already available. Then in terms of the content of the norm or its meaning, the phrase Permenkumham No. 9 of 2017 is formulated specifically and clearly. In addition, the a quo article is also classified as a concrete and technical norm because it is located in the content of the material in the Ministerial Regulation where the candy is classified as "executing regulation" (verordnung/ delegated legislation).

Furthermore, in terms of systematic and synchronizing norms, Permenkumham No. 9 of 2017 in the opinion of the author is quite structured and placed systematically and precisely. Furthermore, this has been supplemented with a Circular Letter Number AHU.UM.01.01-1232 concerning the Guidelines for the Implementation of PMPJ for Notaries clearly, so from this the author has the right to say that the norms have been arranged systematically and in sync because they do not conflict with each other.

Then related to the indicators or the question whether the rule of law in this case is Permenkumham No. 9 of 2017 established an administrative mechanism? Normatively, of course, the answer is "yes". The norm should be formed to form the basis of a legal activity, in this case, the Guide to the Implementation of PMPJ for Notaries. However, if the question is examined outside the legal substance subsystem framework, then in the context of this legal issue the answer is "no". This is because operationally in several Notary Offices in Malang City the implementation of PMPJ is not running effectively. Thus, the author's reasoning in this case states that the legal mechanism has been formed in terms of norms or legal substance. The next indicator is about whether the general public knows the contents of the regulations from Permenkumham No. 9 of



2017? The general public referred to in this case is the subject of the implementing norms so that it is possible for 2 (two) parties, namely the Notary or the public who conduct business relations with the Notary. The author in this case decides to choose a Notary because they are the ones who have the most potential to know about these norms because of their experience and position duties.

The connection with whether or not the rules of Article 2 paragraph (2) Permenkumham No. 9 of 2017, it turns out that many notaries in the Malang City area already know about it, but some of those interviewed have not understood the contents of the a quo rule. This was also reinforced by the results of interviews with the Chairman of the Malang Raya Pengda, Bapak (RIR). A similar matter was conveyed by the WIS Notary who was aware of the existence of Permenkumham No. 9 of 2017 but in the habit of conducting business relations they don't do PMPJ at all and don't understand the contents of the Permenkumham. Then Notary Mr. JHL said that Notaries in Malang City still lacked understanding regarding the meaning of the obligation to carry out PMPJ so that the Ministry of Law and Human Rights and MPD must carry out continuous outreach regarding PMPJ obligations. This means that this effectiveness is not fulfilled because the rule is known by the Notary.

Thus because Permenkumham No. 9 of 2017 is not understood and implemented, *mutatis mutandis* there is no administrative mechanism that can be reached and can be carried out by every citizen. Normatively, the administrative mechanism in terms of PMPJ is based on Permenkumham No. 9 of 2017 basically exists and is mandated. It's just that because it is hindered by existing perceptions and habits, the mechanism does not work as it should and is mandated in regulations. Based on the assessment test in terms of legal substance, the legal substance in this case refers to Article 2 paragraph (2) Permenkumham No. 9 of 2017 it can be concluded that it is not running effectively. This is because there are indicators that are not fulfilled, especially regarding "public knowledge" and "administrative mechanisms that cannot be reached and implemented" in the implementation of PMPJ based on Article 2 paragraph (2) of Permenkumham No. 9 of 2017.

Second, in terms of the legal structure, in this aspect an elaboration will be carried out by examining the application and perceptions of legal structures or legal administrators, who in this context are notaries. An analysis of this legal structure is carried out in relation to the performance of the institution and its components in carrying out the task of enforcing the Regulation of the Minister of Law and Human Rights No. 9 of 2017, also includes legal patterns implemented and enforced in accordance with the rule of law (legal substance). The first indicator relates to the knowledge of the Notaries interviewed regarding the obligation to carry out PMPJ based on Article 2 paragraph (2) of Permenkumham No. 9 of 2017 . If you look at the results of the interviews, all Notaries in Malang City are aware of these rules. After it was concluded that the Notary in Malang City knew the rules of Article 2 paragraph (2) Permenkumham No. 9 of 2017. Then the next question or indicator is whether the notary knows how to apply these rules? Not all of the answers implemented it, the percentage of those who implemented the rule did not reach 50%, based on the results of the interview, the Notary did implement the rule but did not do it in its entirety because there were some who were hesitant to implement it in PMPJ. As for the results of the interview with the Notary, it was stated that the Notary's duties were many, it would be a new burden to carry out PMPJ. Then it was added from the statement from Notary DW that it did not carry out at all, because it takes quite a long time to do PMPJ.

Third, is the aspect of Legal Culture. When testing the legal effectiveness of applying Article 2 paragraph (2) Permenkumham No. 9 of 2017, especially in the aspect of legal culture, according to Freadman, there are 2 (two) components that can be tested. The first is the internal legal culture

which is the legal culture of law enforcement officials within the legal structure. Second, the external legal culture, which is the legal culture of the wider community.

Related to the internal legal culture in this case is the collective knowledge of Notaries in Permenkumham No. 9 of 2017. So that regarding the internal legal culture this has been answered in the description and analysis of the previous legal structure aspects. Thus, the description of this legal aspect will focus more on the external legal culture which is the legal culture of the wider community. In order to find out from the perspective of the legal culture of the community, indicators are used regarding the acknowledgment and assumption that is evenly distributed among the public that the Regulation of the Minister of Law and Human Rights No. 9 of 2017 is indeed effective.

This community's legal culture does not target the wider community or the general public because in this study the general public is not a respondent. Thus, the legal culture of society in this case is more appropriate for Notaries because based on their duties and positions they have the most potential to find out. Based on the data that has been collected, it can be seen that many Notaries in the Greater Malang area do not know the procedures for implementing PMPJ on the grounds that there is a habit of following UUJN, supervision has never been carried out and sanctions have been imposed on Notaries who do not implement PMPJ. Thus it can be concluded that there is no uniform acknowledgment and assumption among Notaries that they have effective conduct. In terms of legal culture, this effectiveness is not fulfilled.

4. CONCLUSION

The application of PMPJ to the Notary's authority in Malang City has not been effective. In the results of the Notary's research, it was found that Notaries did not apply PMPJ because they were considered a burden to the Notary. Even though the substance of the law has provided rules, the implementation of this article is hampered by several factors, namely the notary factor itself which comes from an internal notary who does not apply it, does not understand the obligation to apply PMPJ (PMPJ) based on Permenkumham No. 9 of 2017, Inadequate facilities, notary's lack of understanding regarding how to control/use the IT system, and there are no strict sanctions from the Ministry of Law and Human Rights against notaries who do not implement PMPJ.

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