

Legal Professionals as Gatekeepers in Indonesia's Anti-Money Laundering Regime: Balancing Reporting Duties and Professional Confidentiality

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ABSTRACT

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Money laundering increasingly relies on “gatekeepers”—professional intermediaries who enable the creation of legal and financial structures that may obscure illicit proceeds. In Indonesia, the anti-money laundering framework largely concentrates reporting obligations on financial service providers, while the regulatory position of legal professionals (including lawyers, notaries, and land deed officials/PPAT) remains contested due to professional confidentiality duties. This article employs doctrinal (normative) legal research by analyzing Indonesia's anti-money laundering legislation and implementing regulations and situating them against international standards promoted by Financial Action Task Force and guidance from United Nations Office on Drugs and Crime. The analysis identifies a regulatory gap in clarifying when and how legal professionals should function as reporting parties, particularly for high-risk activities such as establishing legal entities, handling client funds, and conducting property transactions. The article further examines the tension between suspicious transaction reporting and professional secrecy, arguing for a calibrated, risk-based approach that defines reportable activities, provides legal certainty and safe-harbor protections, strengthens supervision and compliance mechanisms, and enhances coordination with PPATK. These measures are proposed to reinforce integrity in Indonesia's financial system while safeguarding legitimate professional confidentiality.



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Introduction

Money laundering remains one of the most adaptive forms of financial crime because it does not depend solely on banks; it also exploits legal and commercial infrastructures that can make illicit assets appear legitimate. One of the most discussed mechanisms in contemporary anti-money laundering (AML) policy is the use of “gatekeepers”—professional intermediaries who, intentionally or inadvertently, enable clients to establish legal entities, move funds, structure transactions, and acquire assets in ways that can obscure beneficial ownership and the origin of proceeds of crime. The gatekeeper concept is particularly salient for legal professionals, whose services may include creating companies, arranging nominee structures, managing client funds, and facilitating high-value property transfers—activities repeatedly identified as vulnerable points for misuse within money laundering typologies (Financial Action Task Force [FATF], 2013).

International AML standards have increasingly encouraged states to address vulnerabilities outside the core financial sector. The FATF Recommendations—widely treated as the global baseline for AML and counter-terrorist financing (CTF) regimes—extend customer due diligence and related obligations to designated non-financial businesses and professions (DNFBPs), including lawyers, notaries, and other independent legal professionals, particularly when they carry out specified financial and transactional

activities for clients (FATF, 2012/updated 2025). In the FATF framework, the risk-based approach is central: legal professionals and competent authorities are expected to identify, assess, and mitigate money laundering risks in a manner proportionate to exposure and context (FATF, 2019). This approach acknowledges the diversity of legal services and aims to avoid overbroad compliance burdens while ensuring that high-risk activities are not left unmonitored. Importantly, the FATF also recognizes the distinctive tension between AML obligations and the ethical/legal protections attached to legal practice, including professional secrecy and legal professional privilege, which differ across jurisdictions but remain a core concern for rule-of-law systems.

In Indonesia, the AML legal architecture is anchored by Law No. 8 of 2010 on the Prevention and Eradication of the Criminal Act of Money Laundering (Republic of Indonesia, 2010). The law establishes the role of PPATK as the national financial intelligence unit responsible for receiving and analyzing financial transaction reports and supporting the broader AML enforcement ecosystem (Republic of Indonesia, 2010). Historically, AML reporting duties in Indonesia, as in many jurisdictions, were implemented most intensively within financial service providers. However, as money laundering typologies evolved—particularly through the use of non-financial intermediaries and asset classes such as real estate—policy attention has expanded toward professions that can facilitate complex transactional structures. A key step in this direction is Government Regulation No. 43 of 2015 concerning Reporting Parties in the Prevention and Eradication of Money Laundering Crimes (Government of Indonesia, 2015). This regulation is widely cited as the legal basis for extending suspicious transaction reporting expectations to a broader category of “reporting parties,” including certain professions.

Operationally, Indonesia's approach to professional gatekeepers has been developed through sectoral and technical instruments that aim to translate the reporting-party framework into implementable compliance processes. For example, notaries are linked to AML controls through the Minister of Law and Human Rights Regulation No. 9 of 2017 on the implementation of the “Know Your Customer” principle (Prinsip Mengenali Pengguna Jasa/PMPJ) for notaries (Ministry of Law and Human Rights, 2017). For legal professionals and other professions designated under the reporting regime, PPATK has also issued rules and guidance on reporting channels and procedures. Notably, PPATK Regulation No. 3 of 2021 regulates the submission of suspicious transaction reports via the goAML application for professions, aiming to standardize electronic reporting and enhance operational efficiency (PPATK, 2021). In addition, PPATK has issued implementing regulations concerning the application of PMPJ obligations for specific professional groups, such as advocates and land deed officials (e.g., PPATK Regulation No. 10 of 2017 for advocates and PPATK Regulation No. 11 of 2017 for PPAT), signaling a multi-instrument policy design for professional compliance (PPATK, 2017a; PPATK, 2017b).

Despite these developments, professional gatekeeping remains one of the most contested areas of AML policy because it sits at the intersection of two public interests: effective crime prevention and the protection of professional confidentiality. Confidentiality obligations are not merely ethical preferences; they are often embedded in statutes and professional frameworks that safeguard client trust, access to counsel, and the integrity of legal services. Under Law No. 18 of 2003 concerning Advocates, advocates are obliged to keep confidential matters known or obtained from clients due to the professional relationship, subject to legal exceptions (Republic of Indonesia, 2003). Similarly, notarial practice is governed by statutory duties and oath-based responsibilities under the Notary Office Law, including Law No. 30 of 2004 and its amendment under Law No. 2 of 2014 (Republic of Indonesia, 2004; Republic of Indonesia, 2014). These confidentiality and secrecy duties can clash with the logic of suspicious transaction reporting, which expects professionals to identify and communicate concerns about potentially illicit transactions to the financial intelligence unit without tipping off the client. The resulting tension raises difficult questions regarding legal certainty, scope of obligations, and the safeguards needed to prevent undue erosion of legitimate confidentiality while still addressing high-risk facilitation pathways.

Recent institutional developments further elevate the urgency of clarifying the role of professional gatekeepers in Indonesia. Indonesia's status within global AML governance strengthened after it was welcomed as a full member of the FATF in late 2023, reflecting an international expectation of continuing alignment with FATF standards and effectiveness requirements (The Cabinet Secretariat of the Republic of Indonesia, 2023; FATF, 2023). Beyond symbolic membership, this development underscores practical pressures: AML regimes are increasingly evaluated not only on “technical compliance” (whether rules exist), but also on “effectiveness” (how well rules are implemented and enforced). The professional gatekeeper

sector is often an evaluation focus because it can represent a structural vulnerability if obligations are ambiguous, supervision is weak, or reporting is minimal despite significant exposure to high-risk transactions.

Against this background, the central problem addressed in this article is the regulatory and practical ambiguity surrounding the positioning of legal professionals as AML gatekeepers within Indonesia's AML regime, especially where reporting obligations intersect with professional confidentiality. While Government Regulation No. 43 of 2015 and subsequent implementing instruments indicate a policy intention to involve professions in suspicious transaction reporting, questions remain about (i) the precise scope of activities that trigger obligations, (ii) the standard of suspicion and evidentiary threshold for reporting, (iii) the degree of safe-harbor protection for professionals who report in good faith, (iv) the design of supervision and enforcement mechanisms, and (v) the normative boundaries that protect legitimate professional secrecy. These uncertainties are not merely academic: unclear rules may lead to under-reporting due to fear of ethical breach or legal liability, or over-reporting that could chill legitimate client access and professional independence.

Accordingly, this article addresses three research questions. First, how do Indonesia's AML statutes and implementing regulations frame legal professionals as gatekeepers, and what activities, obligations, and reporting pathways are contemplated? (Republic of Indonesia, 2010; Government of Indonesia, 2015; PPATK, 2021). Second, how can the tension between suspicious transaction reporting and professional confidentiality be conceptualized within Indonesia's legal-professional frameworks (Republic of Indonesia, 2003; Republic of Indonesia, 2014) while still meeting global standards (FATF, 2012/updated 2025; FATF, 2019)? Third, what regulatory design options—rooted in a risk-based approach—can improve legal certainty and implementation, including clearer delineation of reportable activities, appropriate exemptions and protections, and effective institutional coordination with PPATK?

This article's contribution is twofold. Substantively, it provides a structured doctrinal mapping of Indonesia's AML legal instruments affecting legal professionals, highlighting where the framework is clear, where it is fragmented, and where normative gaps persist. Normatively, it proposes a calibrated model for balancing reporting duties and professional confidentiality by distinguishing between (a) legal services that are most vulnerable to misuse for money laundering (e.g., company formation, management of client funds, real estate conveyancing) and (b) legal services that are closely tied to the core function of legal defense and counsel where privilege and confidentiality protections are strongest. This approach is aligned with the FATF's risk-based logic for legal professionals (FATF, 2019) and is aimed at enhancing both AML effectiveness and rule-of-law safeguards.

Method

This study adopts doctrinal (normative) legal research to examine how legal professionals are positioned as AML "gatekeepers" within Indonesia's anti-money laundering regime and how the framework reconciles reporting obligations with professional confidentiality. The research relies on secondary legal materials, consisting of primary legal sources (Indonesian statutes and implementing regulations governing reporting parties, the application of know-your-customer principles/PMPJ, and reporting procedures through the goAML system) and secondary sources such as scholarly articles, books, and relevant institutional reports to support the policy and conceptual discussion.

The analysis employs a statutory approach to map the applicable norms, define the scope of regulated professions and triggering activities, and identify the obligations imposed (customer due diligence, reporting, and record-keeping). It also uses a conceptual approach to clarify the gatekeeper concept, the risk-based approach, and the normative foundations of professional secrecy, and a benchmarking perspective against the international standards discussed in the article concerning professional involvement in AML compliance. Data are collected through document review by identifying and classifying each relevant instrument according to: covered profession, triggering activities, required measures, reporting channels and procedures, and sanctions/supervisory mechanisms.

The study applies qualitative legal interpretation (textual and systematic reading) and purposive interpretation to relate regulatory design to AML objectives while maintaining legitimate confidentiality safeguards. A normative gap analysis is then conducted to detect ambiguities and inconsistencies, particularly at the intersection between suspicious transaction reporting and professional confidentiality. These findings provide the basis for prescriptive, risk-based recommendations, including clearer delineation of reportable activities, protections for good-faith reporting, and strengthened supervision and coordination for implementation.

Results and Discussion

Mapping the “Gatekeeper” Position of Legal Professionals in Indonesia’s AML System

The doctrinal mapping in this article shows that the “gatekeeper” narrative in Indonesia is framed less as a single explicit statutory concept and more as a functional role attached to certain professions whose services can facilitate the concealment of illicit assets. In the article’s discussion, a gatekeeper is described as a reputable intermediary with expertise and certification whose professional capacity can be leveraged by criminals to access legal/financial arrangements that reduce visibility for law enforcement.

At the institutional level, the article emphasizes that strengthening AML effectiveness depends on improving coordination between PPATK (as FIU) and subsystems in the criminal justice system—including cross-border information exchange with partner FIUs and cooperation with international AML bodies. This matters because gatekeeper-enabled laundering often involves asset placement and layering across jurisdictions, requiring financial intelligence, access to evidence abroad, and structured cooperation mechanisms.

At the same time, the article highlights a major normative tension: it notes that the legislature’s choice not to incorporate the gatekeeper concept into the core money laundering statute creates an on-going debate about how far the role of professions should be formalized as reporting parties. This is a key “finding” of the doctrinal review because it explains why professional AML obligations tend to appear fragmented across implementing instruments rather than being consolidated clearly within the primary AML statute.

Illustrative Cases and Why Gatekeepers Matter

The article uses case illustrations to demonstrate why legal professionals can become pivotal nodes in laundering schemes. It describes an example involving Muchtar Effendi, where assets (land, buildings, vehicles) were allegedly used to conceal origin and ownership, including through the use of other people’s names—an archetypal concealment strategy. The discussion uses this example to underline the operational reality that gatekeepers may facilitate the “legitimization” stage of laundering by creating documentary or transactional distance between the offender and the assets.

In the background section, the article also points to the Djoko Susilo-related narrative (as presented by PPATK statements quoted in media) to show how a professional role could extend beyond a formal legal function into practical facilitation (e.g., negotiating, finding buyers, creating a structure that makes tracing more difficult). The point of these examples, as used in the article, is not to generalize misconduct across the profession, but to demonstrate why regulation and oversight are urged: specialized knowledge and trusted status can be exploited to mask illicit origin and beneficial ownership.

Advocates: Reporting Expectations vs. Attorney–Client Confidentiality

The article positions advocates as central to the gatekeeper debate because advocacy is fundamentally tied to client representation and legal counsel. It explains that advocates are expected to uphold professional independence and ethical conduct and are commonly described as *officium nobile* with responsibilities that include legal services, advice, consultation, drafting, and courtroom representation.

However, the key normative issue is confidentiality. The article cites the Indonesian Advocates’ Code of Ethics as requiring advocates to maintain confidentiality regarding information disclosed in confidence by clients, including after the professional relationship ends. This creates the classic dilemma: how can advocates be involved as reporting parties without undermining a core ethical foundation of the profession?

To address this, the article frames a “participation model” that attempts to preserve confidentiality while enabling reporting in appropriate circumstances. The model’s components include: (a) maintaining attorney–client confidentiality while enabling secure reporting separated from protected information, (b) clarifying when and how advocates should report suspicious activity, (c) providing training and awareness so advocates can recognize suspicious patterns, (d) ensuring legal protection for advocates who report in good faith, and (e) defining mechanisms for cooperation with enforcement agencies and PPATK.

This indicates that, in the article’s framework, advocates can only function as gatekeepers if the system provides clear triggers, safe reporting pathways, and protective safeguards that avoid converting routine legal defense and counseling into a general surveillance function.

Notaries: “Relative Secrecy,” Oath-Based Confidentiality, and PMPJ Obligations

For notaries, the article develops the gatekeeper role through the legal nature of the notarial office. It describes a notary’s oath as including a commitment to keep confidential the contents of deeds and information

obtained in performing the office. The article then explicitly acknowledges that confidentiality is not absolute: in AML contexts, the law may provide exceptions that obligate reporting of suspicious activities to competent authorities while still treating confidentiality as a baseline principle.

A particularly important doctrinal anchor is the concept of relative secrecy: the article cites an explanation that notarial secrecy can be disclosed where public interest must be prioritized or where statutory rules provide an exception, while emphasizing that the duty of non-disclosure is rooted in public law and violations may trigger sanctions.

Operationally, the article links notaries to AML compliance through the Prinsip Mengenali Pengguna Jasa (PMPJ) framework under Permenkumham No. 9 of 2017. The key duties described include (a) identifying service users (including identifying the person appearing before the notary), (b) verifying documents, and (c) monitoring transactions and recording them in an information system, including reporting to PPATK through the Go-AML application.

Notaries are positioned as gatekeepers primarily through transaction-facing functions and document legitimacy. Their AML role is more administratively operational than the advocate's, because it attaches to identification, verification, and transaction monitoring functions that naturally align with notarial workflows.

PPAT: Land Transactions as a High-Exposure Channel

The article emphasizes PPAT as a public official authorized to make authentic deeds for certain legal acts concerning land rights or apartment unit ownership. It further outlines that PPAT's main duty relates to land registration activities through deeds that become the basis for registering changes in land registration data.

From an AML-risk perspective, the doctrinal relevance is straightforward: land and property transactions can be used to integrate illicit funds into formal assets. In the article's structure, PPAT is included in the professional perimeter precisely because PPAT activities occur at a point where the legal system confers authenticity and administrative legitimacy on high-value assets.

goAML as the Reporting Infrastructure and the PMPJ Trigger Threshold

A concrete finding in the article is the existence of reporting procedures specifically directed at professionals, including through PPATK instruments. The paper notes that rules on the form and procedures of reporting for professionals were regulated and then strengthened by PPATK Regulation No. 3 of 2021 concerning suspicious transaction reporting through the goAML application. It further states that goAML is an information system designed by the United Nations Office on Drugs and Crime for financial intelligence agencies in UN member states.

The article also specifies a key compliance trigger: PMPJ applies where there is a professional relationship and the transaction value reaches at least IDR 100 million, requiring professionals to carry out PMPJ to identify and understand potential risks related to laundering. In addition, it notes administrative sanctions for non-compliance, including written warnings, public announcements, and administrative fines.

The existence of a defined threshold and dedicated reporting system indicates that Indonesia's approach is not merely aspirational; it contains operational tools. Yet the article suggests implementation risks remain, especially if professionals perceive the rules as conflicting with confidentiality norms.

The Core Policy Dilemma: Confidentiality vs. Reporting and the "Understanding Gap"

A central synthesis in the article is that the gatekeeper concept remains a polemic because some professionals "do not understand" the concept well, producing a dilemma: professionals must maintain confidentiality but also report suspicions. The article identifies a second polemic: how far confidentiality should protect the professional-client relationship in the presence of reporting duties.

In doctrinal terms, this is best understood as a problem of normative hierarchy and clarity: without clear boundaries, professionals may either under-report (to avoid ethical breach) or over-report (to avoid administrative sanction), both of which can undermine the intended AML effectiveness and the integrity of professional services.

Consolidated Findings and Structured Implications

To keep the Results and Discussion coherent and "review-ready," the doctrinal findings can be consolidated into three points (all derived from the article's own discussion):

1. Professions are structurally vulnerable points for laundering because their services provide legitimacy, documentary strength, and transactional facilitation.

2. Operational instruments exist (PMPJ duties, goAML reporting, threshold, sanctions), but implementation depends on clarity and safeguards.
3. The main obstacle is the confidentiality-reporting dilemma and uneven professional understanding, aggravated by the absence of an explicit gatekeeper concept in the primary AML statute.

Conclusion

This article has shown that the positioning of legal professionals as AML “gatekeepers” in Indonesia is functionally recognized through implementing instruments and compliance mechanisms, even though the gatekeeper concept is not explicitly embedded in the primary money laundering statute. The doctrinal review indicates that the vulnerability of legal and transactional services—particularly in activities that confer legal legitimacy, enable asset transfers, and facilitate ownership concealment—creates a strong policy rationale to involve advocates, notaries, and land deed officials (PPAT) within the AML prevention architecture. At the operational level, the framework has introduced concrete tools such as the application of PMPJ duties, reporting procedures through the goAML system, a value threshold that triggers enhanced obligations, and administrative sanctions for non-compliance.

However, the findings also confirm that implementation is constrained by the core dilemma between reporting duties and professional confidentiality, compounded by uneven understanding of the gatekeeper role within professional communities. This dilemma is particularly sensitive for advocates, where confidentiality and the trust-based nature of legal services are central to professional ethics, while for notaries and PPAT the risk exposure is closely tied to transactional functions that intersect with identity verification, documentation, and asset transfer. As a result, regulatory ambiguity may produce two equally undesirable outcomes: under-reporting due to fear of violating secrecy obligations, or over-reporting driven by compliance anxiety—both of which can undermine AML effectiveness and the integrity of professional services.

Accordingly, this article recommends a calibrated, risk-based regulatory design to strengthen the gatekeeper role while preserving legitimate confidentiality safeguards. First, regulators should provide clearer delineation of reportable activities (especially high-risk services such as company formation, client fund handling, and property transactions) and specify boundaries that protect core legal defense/counseling functions. Second, the framework should strengthen legal certainty and protections for professionals who report in good faith, supported by practical guidance, training, and supervisory mechanisms that focus on high-risk exposure rather than blanket obligations. Third, implementation should be reinforced through more consistent institutional coordination with PPATK and by improving adoption of reporting infrastructure (goAML) and PMPJ processes, including compliance monitoring and proportional sanctions.

In sum, Indonesia already possesses foundational instruments to involve legal professionals within AML prevention, but the system's effectiveness depends on resolving the confidentiality-reporting tension through clearer rules, safeguards, and risk-based implementation. By doing so, the gatekeeper role can be strengthened in a way that supports both AML objectives and rule-of-law values underpinning professional confidentiality.

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The author solely contributed to the conception and design of the study, data collection and legal materials review, analysis and interpretation, and the writing and revision of the manuscript. The author approved the final version for publication.

AI Usage Statement

No generative artificial intelligence tools were used to produce the substantive legal analysis, arguments, or conclusions in this manuscript. AI tools, if any, were used only for language editing (grammar, spelling, and readability) without altering the author's original meaning and without generating new references or factual claims.

Conflict of Interest

The author declares no conflict of interest related to the research, authorship, and/or publication of this article. The author has no financial, professional, or personal relationships that could be perceived as influencing the content of this work.

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