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Application of the Principle of Recognizing Service Users (PMPJ) by Notaries in the Context of Preventing Money Laundering and Terrorism Funding Crimes

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Abstract

One of the bad and unpleasant news for the Indonesian people is the Decision of the Financial Action Task Force (FATF) on June 22, 2001 which stated that Indonesia is one of the 15 countries in the world that is considered not serious and not cooperative in eradicating money laundering crimes. so that Indonesia becomes a heaven on earth for owners of illicit money. In Indonesia it is very easy for owners of illicit money to launder money (to clean up money obtained from a crime). Regardless of the FATF

decision, what is clear is that Indonesia has only issued a TPPU law in 2002, namely Law No.15 of 2002 concerning TPPU, which has been amended by Law No.25 of 2003 and subsequently revoked by Law No.8 of 2010 concerning PPTPPU and a number of implementing regulations. This can be seen that Indonesia has begun to seriously handle and eradicate money laundering, even the PPTPPU Law has expanded the Reporting Party and confirmed the application of PMPJ, where notaries are one of them.

Keywords: Principle of Recognizing Service Users, Money Laundering, Terrorism Funding

1. Introduction

The types and forms of criminal acts (crimes) are increasingly increasing. Both those carried out by individuals and those carried out by an entity (corporation). This increase occurred not only in terms of quantity, but also in terms of the quality of these crimes, in fact they were not only committed within the borders of one country, but were also transnational in nature crossing the borders of other countries.¹

Crimes that are transnational in nature, for example in the form of corruption, goods smuggling, labor smuggling, immigrant smuggling, bribery, banking, slave trading, trafficking in women and children,² illicit trade in narcotics and psychotropics, illegal arms trade, kidnapping, terrorism, theft, embezzlement, fraud, and other types and forms of white-collar crime.³

According to Romli Atmasasmita, the problem of transnational crime, for example criminal acts of terrorism, has become a topic of discussion or made on the agenda in international meetings.⁴ This is certainly very reasonable, because the crime of terrorism has touched the foundations of civilization and the future of human life and has a very broad impact on human survival.⁵

These crimes require good management, certain strategies and a lot of funds. This is of course to finance activities or operational costs in the field. So that the characters or their leaders produce wealth in large numbers. Thus, it can be said that

¹ Annisa Medina Sari, Pengertian Kejahatan Transnasional, Fakultas Hukum UMSU, 10 Mei 2023, <https://fahum.umsu.ac.id/pengertian-kejahatan-transnasional/#:~:text=Pengertian%20Ke-jahatan%20trans-nasional%20adalah%20bentuk,global%20karena%20melibatkan%20berbagai%20negara>, accessed 25 April 2023.

² Kementerian Luar Negeri Republik Indonesia, Kejahatan Lintas Negara, https://www.kemlu.go.id/portal/id/read/89/halaman_list_lainnya/kejahatan-lintas-negara, accessed 24 April 2023.

³ Indonesia Corruption Watch, Kejahatan Kerah Putih, <https://antikorupsi.org/id/article/kejahatan-kerah-putih>, accessed 15 April 2023.

⁴ Romli Atmasasmita, *Aspek Nasional dan Global Pemberantasan Terorisme*, Jurnal Hukum Internasional Unpad, Vol. 2 No. 3 Desember 2003, Bagian Hukum Internasional Fakultas Hukum Universitas Padjadjaran, Bandung, 2003, hal. 228.

⁵ Dahlan Ali, Mustakim, Mahfud, Suhaimi, State Responsibility for the Waters of the Malacca Strait in Relation to the Prevention of Transnasional Crime, *International Journal of Multicultural and Multireligious Understanding*. 2023; 10(3): 86.

these assets were obtained from various criminal acts or from various crimes in question. These assets are not generally used or spent directly by the perpetrators, but are processed in such a way that these assets enter a financial system, including the banking system. The aim is that the said assets become obscure and the results of a crime are no longer visible, so that law enforcement officers become overwhelmed in tracking them down. Thus, the assets will not appear to be the result of a crime at all and it will appear as if they were obtained from legal activities.⁶

Meanwhile, if these assets are directly utilized or spent, it will be very easy to identify or trace the source or origin of these assets, let alone being spent in large and fantastic amounts. In Law No.8 of 2010 concerning the Prevention and Eradication of Money Laundering Crimes (UU-PPTPPU) it is called money laundering.

Besides being able to disrupt, damage and endanger the stability of the economy and the country's financial system, the crime of money laundering can also disrupt the foundations of life and the life of the community, nation and state based on Pancasila and the UUD NRI 1945. This is because money laundering activities and actions are often carried out through financial institutions (so that they are included in the financial system), financial institutions have an important role, especially in implementing the Principles of Recognizing Service Users (PMPJ). However, with the rapid development of society, money laundering crimes are also growing in an increasingly complex manner, namely crossing the boundaries of a country's jurisdiction and using increasingly diverse (varied) modes and methods, affecting several other sectors, even by utilizing institutions outside the financial system (outside financial institutions).⁷ Therefore the PPTPPU Law has expanded the Reporting Parties and confirmed the implementation of PMPJ.

With the expansion of the Reporting Party, according to the PPTPPU Law and its implementing regulations, namely Government Regulation (PP) No.2 of 2016 concerning Procedure for Submission of Data and Information by Government Agencies and/or Private Institutions in the Prevention and Eradication of Money Laundering Crimes, Notaries are one of the parties who have the obligation to submit financial reports to PPATK regarding suspicious transactions,⁸ which are referred to as Reporting Parties. In this case the Reporting Party has been expanded, where the Notary is included.⁹

Based on the description above, it would be interesting if the problem of implementing PMPJ by a Notary could prevent TPPU and terrorism financing. So that later it will be known

how the role of a notary in efforts to prevent TPPU and terrorism funding.

2. Research Methods

Because this research examines regulations related to the application of PMPJ by Notaries in preventing TPPU and financing of terrorist activities, it is clear that this type of research is normative research, and not empirical research. According to Hamitijo-Soemitro, normative legal research includes an inventory of positive law, the discovery of the principles and philosophical basis of positive law and the discovery of *in concreto* law.¹⁰

3. Results and Discussion

The essence of money laundering is dirty money and is often referred to as illicit funds and tends to seek black money in countries where there are still various weaknesses in regulations or legal instruments, and weak law enforcement. Money laundering is usually carried out to disguise, hide or eliminate the source of assets that actually originate from criminal acts. Money laundering in this way makes predicate crimes that lead to criminal consequences just as dangerous. Therefore, it is difficult to distinguish whether a person's money or assets were obtained legally or illegally. Beyond that, the source of the money is unknown and it is feared it could be used to commit other crimes or finance other crimes. As a result, the international community then criminalizes money laundering.¹¹

Money laundering needs to be criminalized, namely criminalization in terms of the use, utilization and financing of activities and other actions on wealth or assets obtained illegally (ie originating from criminal acts). This is what is called money laundering or crime. For example, by criminalizing the use of corruption proceeds, funds for subsequent criminal acts are automatically cut off. This includes channeling the proceeds of a crime into the financial system through preventable financial transactions.¹² The crime of money laundering usually threatens many countries and not only certain countries, but is also growing more widely so that it poses a very serious threat to countries all over the world.¹³

Indonesia currently (since 1999) is the only country in ASEAN that is a member of the G20, but it is very unfortunate because until now Indonesia has not become a member of the Financial Action Task Force (FATF), which is an intergovernmental body in the world that has the goal to develop and promote a number of national and international policies in the context of combating money laundering and the financing of terrorist activities or acts, one of the recommendations relating to the notary profession.¹⁴ Indonesia's desire to become a member of the

⁶ Kompas.com, Pencucian Uang: Pengertian dan Ragam Modus yang Dilakukan, <https://nasional.kompas.com/read/2022/03/15/12391421/pencucian-uang-pengertian-dan-ragam-modus-yang-dilakukan>, accessed 25 April 2023.

⁷ Penjelasan Umum Undang-Undang No. 8 Tahun 2010 tentang PPTPPU.

⁸ Lihat Pasal 1 Angka 11, Pasal 17 Undang-Undang No. 8 Tahun 2010 tentang PPTPPU. dan Pasal 2 ayat (2) serta Penjasannya Peraturan Pemerintah No. 2 Tahun 2016 tentang Tata Cara Penyampaian Data Dan Informasi Oleh Instansi Pemerintah Dan/Atau Lembaga Swasta Dalam Pencegahan Dan Pemberantasan Tindak Pidana Pencucian Uang.

⁹ Lihat Pasal 3 Peraturan Pemerintah No. 2 Tahun 2016..

¹⁰Burhan Ashshofa, *Metode Penelitian Hukum*, Rineka Cipta, Jakarta, 1998, hlm. 13.

¹¹Go Lisanawati, *Memahami Prinsip Mengenali Pengguna Jasa Dalam Hukum Anti Pencucian Uang dan Kewajiban Pelaporan* (dalam Perspektif Hukum Bisnis di Indonesia, Kumpulan Catatan Kritis), Genta Publishing, Bantul-Yogyakarta, 2019, hlm.23.

¹²*Ibid.*, hlm. 24.

¹³*Ibid.*, hlm. 24.

¹⁴Radar Sulbar, <https://radarsulbar.fajar.co.id/2023/04/13/penerapan-pmpj-bagi-notaris-dukungan-kanwil-kemenkumham-sulbar>

FATF has so far received satisfactory results and received appreciation from FATF member countries, because it is considered that so far Indonesia has started to be serious in preventing ML and financing terrorist activities.¹⁵

Previously, one of the bad and unpleasant news for the Indonesian people was the announcement of the FATF decision on June 22, 2001, whereby Indonesia was one of the 15 countries in the world that was considered not serious and uncooperative in eradicating money laundering, so that Indonesia became heaven on earth for owners of illicit money. In Indonesia it is very easy for owners of illicit money to launder money (cleaning money from the proceeds of crime). In addition, Indonesia is also ranked 3rd as the country that is the easiest to do money laundering, after Nigeria and Russia.¹⁶

Regardless of the FATF decision, what is clear is that Indonesia only issued the TPPU Law in 2002, namely Law No.15 of 2002 concerning TPPU, which was later amended by Law No.25 of 2003 and subsequently revoked by Law No.8 of 2010 concerning PPTPPU and a number of implementing regulations. This can be seen that Indonesia has begun to seriously handle and eradicate money laundering, even the PPTPPU Law has expanded the Reporting Party and confirmed the application of PMPJ, where notaries are one of them.¹⁷

The rise of money laundering cases in various sectors such as trade, palm oil management, environment, drug trafficking and others has encouraged all parties involved to commit and support each other in eradicating these cases. One of them, the Minister of Law and Human Rights Yasonna H. Laoly stated that he would make every effort to support and assist PPATK in resolving the TPPU case.¹⁸ One of the things that the Ministry of Law and Human Rights supports and assists PPATK is preventive work, prevention of money laundering and financing of terrorist activities. In this case, by making a notary one of the parties obliged to submit a suspicious financial transaction report to PPATK.¹⁹ This obligation has been regulated in Article 3 PP No.43 of 2015 which states that the reporting party also

includes a notary. In this case the reporting party (notary) is obliged to carry out PMPJ as regulated by the respective regulators and regulators.

Strong support as referred to above is important to implement, especially the application of PMPJ by Notaries, because it can also protect notaries from being misused by people who are not responsible for money laundering and terrorism funding.²⁰

Strengthening the support of the Ministry of Law and Human Rights to support and assist PPATK, especially the implementation of PMPJ, was followed up with the issuance of Minister of Law and Human Rights No. 9 of 2017 concerning Application of the PMPJ for Notaries. The notary's obligation to apply PMPJ to clients (service users) is explicitly stated in Article 2 paragraph (1) of Permenkumham No. 9 of 2017, which states that Notaries are required to implement PMPJ. The enactment of this regulation is a prerequisite for Indonesia to join as a member of the FATF, which is an intergovernmental body established to deal with issues of terrorism funding, money laundering and tax evasion.²¹

The obligation of a notary in implementing PMPJ (a notary is included as a reporting party), because a notary plays an important role in identifying service users and reporting to PPATK if there are suspicious transactions.²²

Meanwhile, in Permenkumham No.9 of 2017 itself does not explain the meaning of PMPJ. Therefore, from the three definitions of PMPJ above, an understanding can be drawn that PMPJ is a principle applied by a Notary as a Reporting Party in order to find out the profile, characteristics, and patterns of Service User Transactions by carrying out the obligations as stipulated in Permenkumham No.9 of 2017.

In the PPTPPU Law, PP No.43 of 2015, PP No.2 of 2016 and PPATK Regulation No.13 of 2016, does not regulate the mechanism for implementing PMPJ by Notaries. However, in Article 4 PPATK Regulation No.13 of 2016 states that Compliance Audits and Special Audits for Reporting Parties are carried out on:

1. Head office or place of business of the Reporting Party.
2. Office or other place of business of the Reporting Party which includes regional offices.
3. Representative offices and branch offices including offices under branch offices.
4. Office or other parties related to the implementation of obligations as a Reporting Party; and/or
5. PPATK office.

Based on the provisions above, it can be seen that the regulation does not regulate the mechanism in detail regarding the application of PMPJ by a Notary as the Reporting Party, but if the Reporting Party violates the

terhadap-indonesia-untuk-menjadi-anggota-fatf/, accessed on 3 May 2023.

¹⁵ PPATK,

https://www.ppatk.go.id/siaran_pers/read/1257/siaran-pers-indonesia-selangkah-lebih-dekat-menjadi-anggota-financial-action-task-force.html, accessed on 3 May 2023.

¹⁶Joni Emirzon, Bentuk Praktik dan Mudus Tindak Pidana Pencucian Uang, https://jurnal.kpk.go.id/Dokumen/SEMINAR_ROADSHOW/Bentuk-praktik-dan-modus-tpu-Joni-Emirzon.pdf, accessed on 12 May 2023.

¹⁷Lihat Pasal 3 PP No. 43 Tahun 2015.

¹⁸Kemenkumham RI, Menkumham Dukung PPATK Berantas Tindak Pidana Pencucian Uang, <https://www.kemenkumham.go.id/berita-utama/menkumham-dukung-ppatk-berantas-tindak-pidana-pencucian-uang>, accessed on 17 Mei 2023.

¹⁹ Lihat Pasal 1 Angka 11, Pasal 17 Undang-Undang No. 8 Tahun 2010 tentang Pencegahan dan Pemberantasan Tindak Pidana Pencucian Uang dan Pasal 2 ayat (2) serta Penjelasannya Peraturan Pemerintah No. 2 Tahun 2016 tentang Tata Cara Penyampaian Data Dan Informasi Oleh Instansi Pemerintah Dan/Atau Lembaga Swasta Dalam Pencegahan Dan Pemberantasan Tindak Pidana Pencucian Uang.

²⁰Alum Simbolon, Irene Puteri Alfani Sofia Sinaga, Implementation of the Principle of Recognizing Service Users (PMPJ) for Notaries in Indonesia, *Asian Journal of Law and Governance*, Vol. 5, No. 1, hlm. 1-8, 2023.

²¹Detania Sukarja, Peranan Notaris Dalam Pengungkapan *Beneficial Ownership* Di Indonesia, https://mkn.usu.ac.id/images/Paper_Seminar_Nasional_Notariat_Detania_Sukarja.pdf, accessed 15 May 2023.

²² Nina Khadijah Maulidia, Gde Made Swardhana, Kewenangan Notaris Dalam Mengenali Pengguna Jasa dan Perlindungan Hukum Jika Terjadinya Tindak Pidana Pencucian Uang, *Acta Comitas: Jurnal Hukum Kenotariatan*, Vol. 5, No. 2, Agustus 2020, hlm. 279.

provisions regarding the implementation of PMPJ, then the Reporting Party can carry out a Compliance Audit or Special Audit. The audit is carried out by the PPATK at the place referred to in Article 4 of the PPATK Regulation. The audit can also be carried out by other parties related to the implementation of obligations as a Reporting Party. In the sense that because the Reporting Party is a Notary, a Compliance Audit or Special Audit can be carried out by other parties related to the performance of obligations as a Reporting Party. The other party referred to here is the Ministry of Law and Human Rights, because the Notary is appointed and dismissed by the Minister, namely the Minister of Law and Human Rights.²³

From the description above it is clear that the Compliance Audit or Special Audit of Notaries in implementing PMPJ is carried out by the Ministry of Law and Human Rights. Furthermore, Article 10 (3) PPATK Regulation No.13 of 2016 concerning Procedures for Implementing Compliance Audits, Special Audits, and Monitoring Follow-up Audit Results, stipulates that: Further provisions for the application of PMPJ refer to laws and regulations regarding the implementation of PMPJ that apply to each profession. Thus, notary as one of the professions under the auspices of the Ministry of Law and Human Rights, the application of PMPJ for notaries refers to the regulations of the Ministry of Law and Human Rights, namely Permenkumham No.9 of 2017.

Application of PMPJ by Notaries to service users, according to Article 2 (2) of Permenkumham No.9 of 2017 contains at least: Identification, verification and monitoring of Service Users. In this case the notary for the benefit or for and on behalf of the service user prepares and performs transactions, regarding:

1. Buying and selling property.
2. Management of money, securities, including other financial service products.
3. A count management, such as savings accounts, current accounts, time deposits, and/or securities.
4. Management or operation of the company.
5. Establishment and sale and purchase of legal entity corporations.²⁴

According to the provisions of Article 4 (1) Permenkumham No.9 of 2017, in the application of PMPJ Notary must:

1. Develop policies and procedures to manage and mitigate money laundering and/or terrorist financing risks identified based on the risk assessment.
2. Carry out risk assessment and classification of service users according to the risk level of money laundering and terrorist financing crimes.

Classification of service users is carried out based on the level of risk and is carried out based on an analysis of:

1. Profile.
2. Business.
3. Country and
4. Product.²⁵

In Article 19 of Permenkumham No.9 of 2017 it is also emphasized that verification of a number of information and documents as stated above must be carried out by a Notary and can request information from service users regarding the formal correctness of these documents. If the formal

correctness of the information and documents is doubtful, the Notary may request other supporting documents from the competent authority.

Verification as referred to above is carried out by a Notary before engaging in business relations with service users, but if the Notary has implemented risk management procedures, the Notary may enter into business relations or transactions with service users prior to verification.²⁶ The notary's next action is to monitor the fairness of transactions carried out by service users.²⁷ In this case the Notary is responsible for recording transactions and information systems regarding identification, monitoring, and providing reports on transactions carried out.²⁸

Furthermore, Article 24 of Permenkumham No.9 of 2017 confirms that:

1. If the service recipient refuses to comply with the PMPJ or the information provided by the service recipient is in doubt, the notary is obliged to terminate the business relationship with the service recipient. The notary is then obliged to report the matter to PPATK within three (three) working days of discovering a suspicious financial transaction.
2. If the transaction involves money laundering and terrorist financing, the notary is obliged to stop applying for PMPJ; the notary believes that the implementation of PMPJ violates the anti-reporting regulations.

Thus the notary has a significant role in identifying service users and reporting them to the PPATK, if the service user has objections to the application of PMPJ against himself and refuses to comply with PMPJ or the truth of the information provided by his client as a service user is doubted by the Notary and knows that there is a transaction that is not reasonable and should be suspected.²⁹ In implementing PMPJ and reporting to PPATK if suspicious financial transactions occur, then the notary cannot be blamed if it is true that the service user did not comply with PMPJ and provided incorrect data or reports to the notary, so it is reasonable to suspect that the service user is indicated to have committed money laundering.

Thus, the notary also gets legal protection and cannot be blamed, in the event that the service user commits money laundering. This is included in one of the legal protections for notaries in carrying out their work, duties and positions. The above description shows that, in order to prevent money laundering, notaries are obliged to apply for PMPJ to the clients whom they serve. If the service user or beneficial owner presents a high risk of money laundering or terrorist financing, the notary is obliged to carry out a more detailed identification even if the service user refuses. In case of any doubt about the PMPJ or information at the request of the service user, the notary is obliged to terminate the business relationship with the service user and report it to PPATK.

4. Conclusion

The FATF decision on June 22, 2001 stated that Indonesia was one of 15 countries in the world that was considered not serious and uncooperative in eradicating money laundering,

²³ Pasal 2 dan Pasal 1 Angka 14 UUUJN.

²⁴ Pasal 2 ayat (3) Permenkumham No. 9 Tahun 2017.

²⁵ Pasal 4 ayat (2) Permenkumham No. 9 Tahun 2017.

²⁶ Pasal 20 Permenkumham No. 9 Tahun 2017.

²⁷ Pasal 21 Permenkumham No. 9 Tahun 2017.

²⁸ Pasal 22 Permenkumham No. 9 Tahun 2017.

²⁹ Nina Khadijah Maulidia, Gde Made Swardhana, *Op. Cit.*, hlm. 279.

so that Indonesia became a heaven on earth for owners of illicit money, because in Indonesia it is very easy for owners to money laundering illicit money (cleaning money from the proceeds of crime). Then in 2022 Indonesia issued a Law on ML in 2002, namely Law No. 15 of 2002 concerning TPPU, which was later amended by Law No. 25 of 2003 and subsequently revoked by Law No. 8 of 2010 concerning PPTPPU and a number of implementing regulations. This can be seen that Indonesia has begun to seriously handle and eradicate money laundering, even the PPTPPU Law has expanded the Reporting Party and confirmed the application of PMPJ, where notaries are one of them. Thus, ML can be prevented from being carried out, while Indonesia's desire to become a member of the PATF can be realized immediately. Thus, the opinion of the countries that are members of the PATF body towards Indonesia that Indonesia is a world paradise for ML perpetrators can be immediately eliminated. Hopefully.

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