

Application of the Principle of Identifying Service Users by Notaries in Preventing Money Laundering Crime

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Keywords:

GoAML, KYC, Money Laundering, STRs, Terrorist Financing

Abstract

Notaries often handle high-value transactions that may be exploited for illicit purposes. Accordingly, notarial application of the Know Your Customer (KYC) principle is a key element of Indonesia's anti-money laundering and counter-terrorist financing (AML/CTF) framework. This study examines how notaries implement KYC and identifies factors affecting compliance with the submission of suspicious transaction reports (STRs) via the GoAML platform. A socio-legal design with qualitative methods was employed, combining primary evidence from surveys and in-depth interviews with notaries in an anonymized jurisdiction and secondary materials from relevant laws and scholarly literature. The results show uneven levels of knowledge, comprehension, attitudes, and legal conduct among notaries in applying KYC obligations. Although the regulatory basis is in place, implementation remains constrained by limited technical capacity, administrative workload, and the persistently low volume of STR reporting. These findings point to a continuing disconnect between formal requirements and field-level practice. The study highlights the importance of sustained capacity-building, more effective oversight, and stronger coordination among government agencies, professional associations, and legal education institutions to enhance KYC implementation and strengthen the AML/CTF regime.

Submitted: 27 August 2024

Accepted: 24 June 2025

Published: 6 December 2025

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To cite this article: Pratami, B. D. 2025. *Application of the Principle of Identifying Service Users by Notaries in Preventing Money Laundering Crime*. *AML/CTF Journal: The Journal of Anti Money Laundering and Countering the Financing of Terrorism* 4(1):13-29, <https://doi.org/10.59593/amlcft.2025.v4i1.234>

Introduction

The Money Laundering Crime Prevention System (TPPU) in Indonesia stipulates a number of professions as Reporting Parties who are obliged to submit Suspicious Financial Transaction Reports (LTKM). This provision is contained in Law Number 8 of 2010¹ as well as technical regulations issued by the Financial Transaction Reporting and Analysis Center (PPATK).² The

¹ Pemerintah Republik Indonesia, "Undang-Undang Republik Indonesia Nomor 8 Tahun 2010 Tentang Pencegahan dan Pemberantasan Tindak Pidana Pencucian Uang" (2010).

² Pemerintah Republik Indonesia, "Peraturan Pusat Pelaporan dan Analisis Transaksi Keuangan Nomor 1 Tahun 2021 Tentang Tata Cara Penyampaian Laporan Transaksi Keuangan Mencurigakan, Transaksi

reporting party is not limited to financial institutions, but also includes non-financial professions such as notaries, advocates, accountants, and tax consultants. This category of profession is considered to have high potential to be used in money laundering and terrorism financing activities.

Notaries as public officials who are authorized to make authentic deeds have a strategic position in the traffic of legal and financial transactions. Therefore, notaries are required to apply the Principle of Recognizing Service Users (PMPJ) and report suspicious transactions through the GoAML electronic reporting system in accordance with the Head of PPATK Regulation Number 3 of 2021. This obligation places notaries as part of the national system of supervision of financial crimes.

The Principle of Recognizing Service Users (PMPJ) is a concept used in the framework of the prevention of Money Laundering Crimes (TPPU) and Terrorism Financing Crimes (TPPT) in Indonesia. Although in various international literature this principle is often identified with *Customer Due Diligence (CDD)* or *Know Your Customer (KYC)*, it is important to note that the terminology has not been fully standardized in Indonesia. Some regulations, such as Bank Indonesia Regulation (PBI) No. 3/10/PBI/2001 and a number of OJK regulations, use different terms but refer to a similar substance, namely the obligation of the reporting institution to recognize and verify the identity of service users. The Regulation of the Head of PPATK also regulates PMPJ as part of the obligations of the reporting profession, including notaries. Therefore, in the context of this article, PMPJ refers to the general principles of identification and verification of service users as stipulated in national regulations, without absolutely equating the terms CDD or KYC in international standards.³ The Principle of Recognizing Service Users (PMPJ) is a procedure applied by the reporting party regulated in the Anti-Corruption Law, which includes financial institutions and certain professions such as notaries, public accountants, advocates, and non-bank financial service providers. This procedure aims to recognize and verify the identity of service users and monitor potentially suspicious transactions as part of financial crime detection and prevention efforts. The importance of PMPJ in the prevention of anti-trafficking and anti-trafficking lies in its ability to identify and reduce the risk of using financial and legal services for illegal purposes.⁴ In the context of money laundering, money laundering often involves attempts to conceal or disguise the origin of funds obtained from criminal activities, making them appear legitimate. Meanwhile, in the TPPT, funds obtained legally or illegally are used to fund terrorism activities, which threaten global security and stability.⁵

PMPJ plays a vital role in breaking this chain of financial crime by ensuring that the individual or entity involved in financial transactions has gone through a rigorous identity verification process.⁶ This involves collecting detailed information about the service users,

Keuangan Tunai, dan Transaksi Keuangan Transfer Dana dari dan Ke Luar Negeri Melalui Aplikasi GoA” (2021).

³ Hadi Iswanto et al., “Monitoring Application for Submission of PBJ Transaction Reports on PPATK,” *Journal of Information System, Informatics and Computing* 7, no. 1 (2023): 11, <https://doi.org/10.52362/jisicom.v7i1.704>.

⁴ F L Pramadanty, “Form of Application of the Principle of Recognizing Service Users (Pmpj) by Land Deed Making Officials in Their Duties and Authorities,” *International Journal of Islamic Education, Research and Multiculturalism* 6, no. 1 (2024): 21, <https://journal.yaspim.org/index.php/IJIERM/article/view/328%0Ahttps://journal.yaspim.org/index.php/IJIERM/article/download/328/234>.

⁵ Fany Dewi Rengganis and Dwi Setiawan Susanto, “Evaluation of the anti-money laundering programs implementation in Indonesia,” *Integrity: Anti-Corruption Journal* 9, no. 2 (2023): 43, <https://doi.org/10.32697/integritas.v9i2.973>.

⁶ CJFX Purba, “Perlindungan Hukum Notaris dalam Penerapan Prinsip Mengenali Pengguna Jasa untuk Harmonisasi Tercapainya Ketertiban Umum,” *Veritas: Jurnal Program Pascasarjana Ilmu Hukum Universitas Islam As-Syafiiah* 10, no. 1 (2024): 112,

including the background, source of funds, and purpose of the transaction. In addition, PMPJ also includes risk assessments based on the profile of service users and their transactional characteristics. Notaries, as one of the actors in the legal system who are often involved in the process of transfer of rights, deeds, and property transactions, have a great responsibility in ensuring that their services are not misused for the purposes of money laundering or terrorism financing. By implementing PMPJ, notaries can detect suspicious transactions, report unusual activities, and cut off the perpetrators' access to legitimate financial networks.⁷

Furthermore, the implementation of PMPJ by notaries not only protects the integrity of the profession and financial institutions, but also contributes to the stability of the national and international financial systems. Success in preventing anti-trafficking and anti-trafficking is highly dependent on strict compliance with the PMPJ, considering the increasingly sophisticated modus operandi used by financial crime perpetrators. Stringent regulations, including those issued by the *Financial Action Task Force* (FATF), encourage all parties involved in the financial sector, including notaries, to adopt PMPJ as an integral part of their operational procedures. Thus, PMPJ is not only a legal obligation, but also a proactive step in protecting the public from the adverse effects of financial crimes. The effective implementation of PMPJ will narrow the space for movement of TPPU and TPPT actors, reduce reputational risks for related institutions, and strengthen the resilience of the financial system as a whole.

The implementation of the Principle of Recognizing Service Users (PMPJ) is one of the crucial elements in efforts to prevent Money Laundering Crimes (TPPU) and Terrorism Financing Crimes (TPPT) in various jurisdictions.⁸ A number of studies have highlighted the importance of applying this principle in the financial services sector and the legal profession, including among notaries.⁹ Research by Go Lisanawati (2023)¹⁰ outlines that weaknesses in the implementation of PMPJ by financial service providers are often the main loophole used by financial criminals to disguise the origin of funds from illegal activities. Lack of legal understanding and knowledge of PMPJ leads to non-optimal implementation and risks increasing money laundering practices. Puspareni and Wisnaeni (2023)¹¹ examined the role of legal attitudes of legal professionals, including notaries, in supporting the success of anti-money laundering regulations. They found that apathy and non-compliance with PMPJ are often triggered by a lack of adequate knowledge and understanding of the importance of such regulations. Sanjana and colleagues (2021) highlight that notary legal behavior has an important role in the implementation of anti-money laundering policies.¹² The results show that the tendency to ignore PMPJ procedures is due to the confusing complexity of regulations as well

<https://jurnal.uia.ac.id/veritas/article/view/3494%0Ahttps://jurnal.uia.ac.id/veritas/article/download/3494/1827>.

⁷ Melvin Soudijn, "Encounters with Professional Money Launderers; An Analysis of Financial Transactions as Reported by Gatekeepers," *European Journal on Criminal Policy and Research* 30, no. 1 (2024): 435–48, <https://doi.org/10.1007/s10610-024-09588-8>.

⁸ US Department of State, "Country Reports on Terrorism 2019: Australia," *US Department of State* (clubofmozambique.com, 2020), 34, https://clubofmozambique.com/wp-content/uploads/2023/02/Country_Reports_2021_Complete_MASTER.no_maps-011323-Accessible-1.pdf.

⁹ L Iskandar, "Upaya Pemerintah dalam Rangka Pencegahan Tindak Pidana Pencucian Uang," *Buletin APBN Vol. VII. Ed.*, 2022, 34.

¹⁰ Go Lisanawati, "Mengurai Permasalahan Hukum Terkait Transaksi Keuangan dalam Pencucian Uang," *AML/CFT Journal: Jurnal Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme* 1, no. 2 (2023): 220, <https://journal.ppatk.go.id/index.php/jac/article/view/59>.

¹¹ Annisa Septia Puspareni and Fifiana Wisnaeni, "Relevansi Penerapan Prinsip Mengenali Pengguna Jasa Terhadap Kewenangan Notaris," *Notarius* 16, no. 2 (2023): 23, <https://doi.org/10.14710/nts.v16i2.41360>.

¹² Putu Pran Sanjana, Implementasi Peranan Notaris dalam Pencegahan Tindak Pidana Pencucian Uang (Studi di Kantor Notaris Desy Erina, Sh, M. Kn.), *Kertha Widya* 12, no. 1 (2024): 74, <https://ejournal.unipas.ac.id/index.php/KW/article/view/1956>.

as the lack of specialized training. The study also found a link between non-compliant legal behavior and an increased risk of financial crime.

Various studies have provided a clear picture of the importance of implementing PMPJ, this research differs in several ways. First, the main focus of this study is on a comprehensive measurement of the knowledge, understanding, attitudes, and behavior of notary law in a confidential district in Indonesia. Measurement was carried out through structured questionnaire instruments and in-depth interviews, which were designed based on the following conceptual indicators: legal knowledge was measured based on the level of understanding of laws and regulations related to PMPJ; legal understanding was measured through the notary's ability to interpret and apply rules in hypothetical cases; legal attitudes were measured from respondents' tendency to accept or reject the implementation of PMPJ; while legal behavior was measured from the consistency of notary's real actions in implementing PMPJ, including reporting suspicious transactions. Each indicator is developed into a question item that is conceptually validated and tested for reliability through initial testing. In contrast to previous research which tends to be normative or focuses on international case studies, this study offers an empirical approach that directly examines how the knowledge, understanding, attitude, and behavior of notary law interact in the practice of implementing PMPJ in Indonesia. Although the location of the study is disguised with the acronym [XYZ] to maintain the privacy and ethics of the research, the characteristics of the region are still explained through the relevant social, economic, and volume dimensions of legal activity, so that the local context remains understandable. This study not only identifies the factors that affect the implementation of PMPJ, but also formulates recommendations based on empirical findings that can be adapted to areas with similar conditions, especially areas with high intensity of legal transactions but uneven levels of legal compliance. Thus, this research is expected to make a significant contribution to the development of more effective legal policies and practices in Indonesia.

Juridically, the implementation of PMPJ by the notary profession has been regulated in detail in various regulations, including the Head of PPATK Regulation Number 3 of 2021 concerning Procedures for Submitting Suspicious Financial Transaction Reports (LTKM) through *the* GoAML platform for the notary profession. This regulation is a concrete form of the government's commitment to strengthening the early detection system for potentially illegal financial transactions, by placing notaries as one of the *gatekeepers* responsible for reporting suspicious transactions. A study by Siahaan and Ilvira (2023) shows that even though this regulation has been implemented, there are still obstacles in its implementation in the field, especially related to the level of legal understanding and knowledge of notaries regarding the reporting mechanism through GoAML.¹³

The implementation of PMPJ, as stipulated in this regulation, reflects the principles of legal and moral responsibility inherent in the notary profession. PMPJ is not only a technical tool to detect and prevent financial crimes, but also as a manifestation of the values of justice and accountability in the legal profession. Research by Siska (2022) strengthens this argument by emphasizing that anti-money laundering policies should be based on the principles of distributive justice and shared responsibility in protecting the integrity of the financial system.¹⁴ In this context, the role of notaries as guardians of public trust in legal transactions has a deep philosophical dimension, considering that this profession is not only tasked with validating documents, but also keeping the transaction from becoming a means for illegal activities.

¹³ A Smirqaku dan I Ramadani, "Money Laundering as a Negative Phenomenon for the Republic of Kosovo," *International Journal of Social Science Research and Review* 5, no. 7 (2022): 221, <https://ijssrr.com/journal/article/view/520%0Ahttps://ijssrr.com/journal/article/download/520/344>.

¹⁴ Eliya, "Peran Notaris dalam Pencegahan Tindak Pidana Pencucian Uang di Era Digital Melalui Aplikasi Go Anti Money Laundering (GoAML)," *Jurnal Hukum to-ra : Hukum Untuk Mengatur dan Melindungi Masyarakat*, 8, no. 3 (2022): 223, <https://doi.org/10.55809/tora.v8i3.148>.

The implementation of PMPJ and reporting obligations through GoAML also has an impact on social dynamics in the notary profession. The success of anti-money laundering policies depends on the active involvement of all elements of the legal community, including notaries. The implementation of these regulations faces challenges at the practical level, especially related to resistance to change and lack of effective socialization. The lack of understanding related to new technologies such as the GoAML platform is one of the sociological obstacles that hinder the smooth implementation of this regulation. These factors suggest that the implementation of PMPJ by notaries requires a comprehensive approach, which includes training and strengthening legal awareness to improve compliance.¹⁵

This research aims to examine and analyze the application of the Principle of Recognizing Service Users (PMPJ) by notaries in order to support the prevention of Money Laundering Crimes (TPPU) and Terrorism Financing Crimes (TPPT). The main focus of this study is to examine the extent to which notaries in Indonesia understand, implement, and comply with the regulations governing PMPJ, especially in the context of reporting suspicious financial transactions through the GoAML platform as stipulated in the Head of PPATK Regulation Number 3 of 2021. This study specifically highlights the gap between notary legal understanding and their behavior in meeting suspicious transaction reporting obligations. This focus was chosen because previous research tended not to examine in depth how notaries' personal perceptions and interpretations of regulations affect the actual level of compliance in the field. This gap is important to analyze to understand why the implementation of PMPJ often does not run optimally even though the legal framework is available. Through a holistic approach, this study aims to provide an empirical picture of the role of notaries as part of the financial crime prevention system, as well as identify obstacles that may arise in the implementation of PMPJ in the field.¹⁶

The research method used in this study is a socio-legal research method,¹⁷ which is relevant to examine legal issues related to social aspects and the context of people's lives. The socio-legal approach allows this study to not only examine the texts of applicable laws and regulations, but also to understand how the law is implemented in practice as well as how legal actors, in this case notaries, respond to existing regulations. The relevance of the use of socio-legal methods in this study lies in its ability to delve deeper into the influence of social, economic, and cultural aspects on the legal behavior of notaries. In addition, this approach helps to understand the dynamics of the relationship between written law and social realities faced by notaries, so that they can provide recommendations that are more applicable and in accordance with real conditions in the field. The socio-legal approach also allows researchers to assess the effectiveness of regulations in certain social contexts, so that various challenges and opportunities can be identified to improve the implementation of PMPJ by notaries in supporting the prevention of anti-trafficking and anti-trafficking in Indonesia.

The data collection technique used in this study involves a combined approach between primary and secondary data. Primary data was collected through in-depth interviews using an emic perspective that tries to explain a phenomenon in society from the perspective of the community itself (insider view), in this case a notary in the research area who is disguised using the acronym [XYZ]. This interview was designed to measure the level of legal knowledge, understanding, attitudes, and behaviors related to the application of the Principle of Recognizing Service Users (PMPJ) in supporting the prevention of Money Laundering Crimes

¹⁵ A M Risquallah and Y A Setyono, "Peran Notaris Cegah Transaksi Illegal Melalui Goaml," *Jurnal Kertha Semaya* 10, no. 6 (2022): 76, <https://garuda.kemdikbud.go.id/documents/detail/2824959>.

¹⁶ Pramadanty, "Form of Application of the Principle of Recognizing Service Users (Pmpj) by Land Deed Making Officials in Their Duties and Authorities," 21.

¹⁷ Reza Banakar and Max Travers, *Theory and method in socio-legal research* (Bloomsbury Publishing, 2005), 223.

(TPPU) and Terrorism Financing Crimes (TPPT). The in-depth interview was conducted to explore in more detail the challenges and obstacles faced by notaries in implementing PMPJ regulations, as well as their perceptions of reporting obligations through the GoAML platform as stipulated in PPATK Head Regulation Number 3 of 2021. Secondary data were collected from legal documents, scientific journals, and reports related to the implementation of PMPJ in various jurisdictions.¹⁸

The data analysis technique used in this study is qualitative analysis. Qualitative analysis was applied to interpret the results of the interviews and understand the complex narratives that emerged from the notary's experience related to the implementation of PMPJ. This technique involves the process of coding data to identify key themes related to the legal knowledge, understanding, attitudes, and legal behaviors of notaries. By combining these approaches, research can provide a comprehensive picture of how regulations are implemented and the challenges notaries face in the field.

The research area, which is disguised with the acronym [XYZ] to maintain privacy, is one of the districts in Indonesia that has certain characteristics in terms of the implementation of PMPJ regulations by notaries. This region was chosen because it has a significant level of legal activity and financial transactions, which allows researchers to observe variations in the implementation of PMPJ in various contexts. The selection of this region is also based on the existence of an extensive network of notaries, which provides a good representation of the dynamics of the implementation of regulations in the diverse social and economic contexts in Indonesia.

Discussion

Notary Legal Awareness in Applying the Principle of Recognizing Service Users

The research area disguised by the acronym [XYZ] is an area with diverse socio-economic characteristics, where the legal services sector, including the notary profession, plays an important role in the dynamics of the local economy. [XYZ] is known as a thriving hub of economic activity, with a high rate of urbanization and a diverse population in terms of ethnic, social, and economic backgrounds. The region has experienced rapid growth in business, property, and financial transactions, often involving notaries in various authentic deeds, agreements, and other related transactions. However, along with these rapid developments, there are also risks related to financial crimes, including money laundering and terrorism financing, which increasingly require the application of the Principle of Recognizing Service Users (PMPJ) by notaries in this region.

The data shows that in [XYZ], there has been a significant increase in the number of property and corporate transactions that require notary intervention. In the last year, there were more than 1,000 property agreement deeds facilitated by local notaries, with transaction values reaching trillions of rupiah. Meanwhile, the number of companies established with the help of notaries in this region also increased by 15% compared to the previous year. However, research and audit reports show that the level of notary compliance with PMPJ still varies. Data were obtained through semi-structured interviews with 50 notaries who were actively practicing in the research area [XYZ]. The selection of respondents was purposively conducted by considering experience, involvement in high-value financial transactions, and geographical distribution within the region to obtain representative variation. The interviews focused on four main variables: knowledge, understanding, attitudes, and legal behaviors related to the implementation of PMPJ. The interview process was recorded, transcribed, and analyzed using a qualitative approach with thematic analysis techniques. The results of the analysis show that only about 60% of notaries implement PMPJ consistently according to national regulatory

¹⁸ A.M Miles, M.B & Huberman, *An expanded sourcebook: Qualitative data analysis (2nd Edition)*, Sage Publications, 2 ed., vol. 1304 (California: SAGE Publications, Inc., 1994), 121.

standards. Meanwhile, another 40% indicated barriers in the form of limited substantial understanding, lack of training, limited reporting system support (such as GoAML), and high administrative burden.

Table 1. An overview of the increase in property and corporate activity in the [XYZ] region

Category	Data
Category Data	Number of Property
Agreement Deeds	More than 1,000 property deeds facilitated by notaries
Property Transaction Value	Reaching trillions of rupiah
Increase in the number of new companies	15% increase in established companies compared to the previous year
Notary Compliance Level with PMPJ	60% of notaries consistently implement PMPJ according to national standards
Number of Notaries Interviewed	50 notaries
Challenges in the Implementation of PMPJ	40% of notaries face limited knowledge, resources, and system support

Sources: Results of an interview with a notary¹⁹

This condition is exacerbated by the low level of suspicious transaction reporting from the legal services sector, including notaries, although [XYZ] has been identified as an area with a high risk related to money laundering crimes. Factors such as pressure to complete transactions quickly, lack of ongoing training, and the view that the implementation of PMPJ can hamper business processes, also contribute to the weak implementation of PMPJ in the region. This raises concerns that the [XYZ] region could become a vulnerable point for money laundering practices, which could ultimately undermine the integrity of the financial and legal systems in the region.

Therefore, this condition demands a more serious intervention from the authorities to increase legal awareness and the capacity of notaries in [XYZ] in implementing PMPJ. Proposed measures include increased supervision, the provision of more specific training, and the development of systems that support the implementation of PMPJ more effectively. Thus, it is hoped that the [XYZ] region can improve the security and transparency of transactions and contribute to national efforts to prevent financial crime.

The correlation between the knowledge, understanding, attitude, and behavior of notary law in implementing the Principle of Recognizing Service Users (PMPJ) is an important element that determines the success of efforts to prevent Money Laundering Crimes (TPPU) and Terrorism Financing Crimes (TPPT).²⁰ Legal knowledge refers to how well notaries understand the rules and regulations related to PMPJ. A deeper understanding of the law, refers to the notary's ability to interpret and apply such knowledge in a practical context, especially in situations that are complex and require professional judgment. Legal attitudes reflect notaries' perceptions and beliefs of the importance of implementing PMPJ, including their willingness to comply with the rules even though it may add to the workload or require extra care. Legal behavior, in the end, is a manifestation of this knowledge, understanding, and attitude in real action, namely how notaries carry out PMPJ in daily activities.²¹

¹⁹ Private Interviews with 50 notaries in the XYZ region, January 31, 2023;

²⁰ Alex P. Schmid, *Free Online Publication: Handbook of Terrorism Prevention and Preparedness, Perspectives on Terrorism*, vol. 15 (researchgate.net, 2021), 41, https://www.researchgate.net/profile/Alex-Schmid/publication/357084043_V104_Handbook_of_Terrorism_Prevention_and_Preparedness_The_Hague_ICCT_2020_xxix_1278_pp_edited_by_Alex_P_Schmid/links/61bb2647fd2cbd7200a3ed35/V104-Handbook-of-Terrorism-Prevention-and-

²¹ Abdul Halim Barkatullah, "Budaya Hukum Masyarakat dalam Perspektif Sistem Hukum," *UKWS Journal* 1, no. 1 (2013): 23, <https://www.bertelsmann->

The correlation between these elements is interdependent. Adequate knowledge is the initial foundation that allows notaries to understand the complexity of PMPJ regulations. However, without the correct understanding, such knowledge can become superficial and ineffective in dealing with real situations. A good understanding will guide notaries to implement PMPJ not only covering the process of identifying and verifying the identity of service users, but also involves continuous monitoring of business relationships and transactions made. These three stages form a structured business process, as mandated in national regulations and international standards. However, the results of the interviews show that most notaries only carry out the initial two stages administratively, without continuing to the stage of monitoring transactions or service user relations on an ongoing basis. In addition, the application of *risk-based approach principles* such as *Customer Due Diligence (CDD)* and *Enhanced Due Diligence (EDD)* has not been fully understood or implemented. In the context of the research subject, notaries tend not to distinguish between low-risk and high-risk service users, so the identification approach is not adjusted to the level of transaction risk. This has an impact on weak early detection of potential suspicious transactions and the lack of optimal reporting obligations through GoAML. A positive and supportive legal attitude is the result of strong knowledge and understanding. Notaries who understand the risks associated with not implementing PMPJ correctly will tend to have a proactive attitude and be responsible for their legal obligations. This attitude, in turn, will affect their legal behavior in carrying out their duties.

Legal behavior is the final indicator of the success of this process. Notaries who have knowledge, understanding, and a good attitude towards PMPJ will show consistent behavior in complying with the rules, reporting suspicious transactions, and protecting the integrity of the legal system from potential abuse. On the other hand, if one of these elements is weak, then the implementation of PMPJ can be suboptimal, increasing the risk of TPPU or TPPT through notary services.²² A strong and positive correlation between legal knowledge, understanding, attitudes, and behaviors is key to ensuring that the Recognize Service Users Principles are implemented effectively, ultimately supporting national and global efforts to combat financial crime.²³

The correlation between the knowledge, understanding, attitude, and behavior of notary law in implementing the Principle of Recognizing Service Users (PMPJ) is an important element that determines the success of efforts to prevent Money Laundering Crimes (TPPU) and Terrorism Financing Crimes (TPPT). Legal knowledge refers to how well notaries understand the rules and regulations related to PMPJ. A deeper understanding of the law, refers to the notary's ability to interpret and apply such knowledge in a practical context, especially in situations that are complex and require professional judgment. Legal attitudes reflect notaries' perceptions and beliefs of the importance of implementing PMPJ, including their willingness to comply with the rules even though it may add to the workload or require extra care. Legal

stiftung.de/fileadmin/files/BS/Publikationen/GrauePublikationen/MT_Globalization_Report_2018.pdf%0Ahttp://eprints.lse.ac.uk/43447/1/India_globalisation%2C_society_and_inequalities%28Isero%29.pdf%0Ahttps://www.quora.com/What-is-the.

²² Netty Siagian, "Analysis of Terrorism Criminal Act Case Handling In Indonesia," in *IProceedings of the 3rd International Conference on Indonesian Legal Studies, ICILS 2020* (Semarang: books.google.com, 2020), 17, <https://doi.org/10.4108/eai.1-7-2020.2303648>.

²³ Mutia Karina Norman, "Penerapan Prinsip Mengenali Pengguna Jasa (PMPJ) Bagi Notaris Dalam Rangka Mutual Evaluation Review (MER) Financial Action Task Force (FATF) Terhadap Indonesia," *JISIP (Jurnal Ilmu Sosial dan Pendidikan)* 7, no. 1 (2023): 12, <https://ejournal.mandalanursa.org/index.php/JISIP/article/view/4086%0Ahttps://ejournal.mandalanursa.org/index.php/JISIP/article/viewFile/4086/3861>.

behavior, in the end, is a manifestation of this knowledge, understanding, and attitude in real action, namely how notaries carry out PMPJ in daily activities.²⁴²⁵

The results of interviews with 50 notaries in the study area showed that there was significant variation in aspects of their legal knowledge, understanding, attitudes, and behaviors related to the implementation of PMPJ. Around 60% of respondents admitted that they generally understood the provisions of PMPJ, but only a small percentage could explain the specifics of the reporting procedure through GoAML or distinguish between CDD and EDD. In terms of attitudes, the majority of notaries stated that they agreed with the importance of PMPJ, but only 58% actually verified the identity of service users thoroughly in practice. Meanwhile, only about 30% admitted to actively monitoring and reporting potential suspicious transactions independently without pressure from clients or agencies.

The correlation between these elements is interdependent. Adequate knowledge is the initial foundation that allows notaries to understand the complexity of PMPJ regulations. However, without the correct understanding, such knowledge can become superficial and ineffective in dealing with real situations. A good understanding helps notaries apply those principles appropriately, especially in complex situations that require risk assessment. A positive legal attitude will encourage motivation to act in accordance with regulations, while legal behavior is a form of actualization of all these elements in daily practice. Good understanding will guide notaries to implement PMPJ appropriately and prevent errors in the process of identifying and verifying service users. A positive and supportive legal attitude is the result of strong knowledge and understanding. Notaries who understand the risks associated with not implementing PMPJ correctly will tend to be proactive and responsible for their legal obligations. This attitude, in turn, will affect their legal behavior in carrying out their duties.²⁶²⁷

Legal behavior is the final indicator of the success of this process. Notaries who have knowledge, understanding, and a good attitude towards PMPJ will show consistent behavior in complying with the rules, reporting suspicious transactions, and protecting the integrity of the legal system from potential abuse. On the other hand, if one of these elements is weak, then the implementation of PMPJ can be suboptimal, increasing the risk of TPPU or TPPT through notary services. Thus, a strong and positive correlation between legal knowledge, understanding, attitudes, and behaviors is key to ensuring that the PMPJ is implemented effectively, ultimately supporting national and global efforts in the fight against financial crime.

The legal understanding of notaries in implementing PMPJ shows that despite efforts to improve understanding and compliance, the level of legal awareness among notaries still varies and is not fully optimal. Notary legal awareness can be measured through several main indicators, namely their level of knowledge, understanding, attitude, and legal behavior related to PMPJ. The legal knowledge that notaries possess is often limited to a basic understanding of regulatory obligations without being followed by an in-depth understanding of the broader legal implications and risks. This reflects the gap between what the notary knows and how that knowledge is applied in everyday practice. Legal understanding, which should include the

²⁴ Sanjana, Surata, and Arta, "Implementasi Peranan Notaris dalam Pencegahan Tindak Pidana Pencucian Uang (Studi di Kantor Notaris Desy Erina, Sh, M. Kn.)," 76.

²⁵ Shalahuddin Suriadiredja and Mohamad Fajri Mekka Putra, "Penunjukan Notaris Sebagai Pihak Pelapor Dan Kewajiban Menerapkan Prinsip Mengenali Pengguna Jasa Serta Implikasinya Terhadap Kepastian Hukum," *Jurnal Komunikasi Hukum (JKH)* 8, no. 1 (2022): 43, <https://doi.org/10.23887/jkh.v8i1.43876>.

²⁶ Yuli Endah Wardantik, Khoidin, dan Wahyu Prawesthi, "Legal Liability for Notaries Due To the Issuance of Authentic Deeds Resulting in State Losses," *Journal Of Social Sciences And Humanites* 2, no. 1 (2023): 22, <https://doi.org/10.56943/jssh.v2i1.264>.

²⁷ I M P Dharsana dan I Kresnadjaja, "The Role of The Notary to Prevent Money Laundering Actions," *Community Service Journal of Law* 2, no. 1 (2023): 213, <https://www.ejournal.warmadewa.ac.id/index.php/csjl/article/view/6362%0Ahttps://www.ejournal.warmadewa.ac.id/index.php/csjl/article/download/6362/4273>.

ability to identify and deal with complex situations related to money laundering and terrorism financing, is also uneven. Some notaries show good understanding and are able to implement PMPJ procedures correctly, while others have difficulty interpreting the rules and applying them effectively.

The legal attitude indicator reveals that although many notaries recognize the importance of PMPJ, there are also those who view it as an additional burden that hinders the smooth running of their work. This attitude, especially when influenced by economic pressures or the perception that full compliance will not be strictly monitored, can lead to suboptimal practices in implementing PMPJ. As a result, the legal conduct of notaries, which are supposed to reflect consistent compliance with PMPJ procedures, often does not meet the expected standards. Some notaries may be inclined to cut corners or overlook important steps in PMPJ, especially when dealing with high-value clients or in urgent situations. Strong legal awareness should be reflected in consistent and integrity legal behavior, but the reality on the ground shows that there is a mismatch between knowledge and action.

The legal understanding of notaries in implementing PMPJ still needs to be improved, especially through continuous education, increased supervision, and strengthening the culture of legal compliance. The ideal legal awareness in the context of this study refers to conditions where notaries have a high level of legal knowledge (demonstrated through an understanding of the regulations and obligations of PMPJ), a deep understanding of the principles and context of the implementation of regulations, a positive attitude towards legal compliance (e.g. readiness to report suspicious transactions despite the risk of disrupting client relations), and consistent legal behavior (evidenced by the application of PMPJ procedures and active reporting through the GoAML system). These four indicators are the main parameters in determining the level of legal awareness, and each is measured through a combination of questionnaires and in-depth interviews in this study.

Factors that affect Notary Legal Awareness in Applying the Principle of Recognizing Service Users

Notary legal awareness in implementing PMPJ is influenced by various interrelated factors, both from internal and external aspects. One of the main factors is the level of legal education and training that notaries obtain. Adequate formal education and ongoing training are essential to build a strong foundation of legal knowledge, especially in understanding and implementing regulations related to PMPJ. Notaries who have access to quality education and training are usually more aware of the importance of PMPJ and tend to be more obedient in implementing it. On the other hand, the lack of specialized training related to the prevention of money laundering and terrorism financing can lead to gaps in the understanding and implementation of PMPJ, thereby lowering the level of legal awareness.²⁸

Another factor is the work experience and frequency of the notary's involvement in high-risk transactions. Notaries who are more experienced in handling complex transactions and have exposure to various types of legal risks tend to be more sensitive to the importance of PMPJ. This experience also affects their ability to identify and handle potential suspicious transactions. However, notaries who are less experienced or who are rarely involved in large transactions may have a lower level of legal awareness due to their lack of exposure to situations that demand the strict implementation of PMPJ.

In addition, the work environment and organizational culture also play an important role in shaping notary legal awareness. Notaries who work in an environment that supports legal compliance, where PMPJ procedures are carried out with discipline and are closely supervised, tend to have a higher level of legal awareness. Conversely, in a less supportive environment or one that is more business-oriented than legal compliance, notaries may feel compelled to ignore

²⁸ Private Interviews with 50 notaries in the XYZ region, February 3, 2023;

PMPJ procedures in order to expedite transactions or meet financial targets. Pressure from the client, especially from those who have a big or influential interest, can also affect the attitude and behavior of notaries in implementing PMPJ. Notaries may feel trapped in a dilemma between maintaining a good relationship with clients and adhering to the rule of law, which can ultimately reduce their legal awareness.

Government regulations and policies are also significant external factors. Strict supervision from the competent authorities and strict sanctions against PMPJ violations can increase the legal awareness of notaries. On the other hand, if regulations are unclear, supervision is weak, and sanctions are not implemented consistently, notaries may feel that the implementation of PMPJ is not an urgent priority. This can lead to indifference or even disregard for their legal obligations. In addition, notaries' perception of legal risks and reputations also affects their legal awareness. Notaries who are aware of the potential for serious legal and reputational losses due to PMPJ violations are usually more motivated to comply with the rules. However, if such risks are considered low or avoidable, legal awareness tends to decline.

Overall, notary legal awareness in implementing PMPJ is the result of a complex interaction between knowledge, experience, work environment, regulations, and risk perception. These factors should be considered holistically to understand why levels of legal awareness vary among notaries and how legal awareness raising efforts can be effectively made.

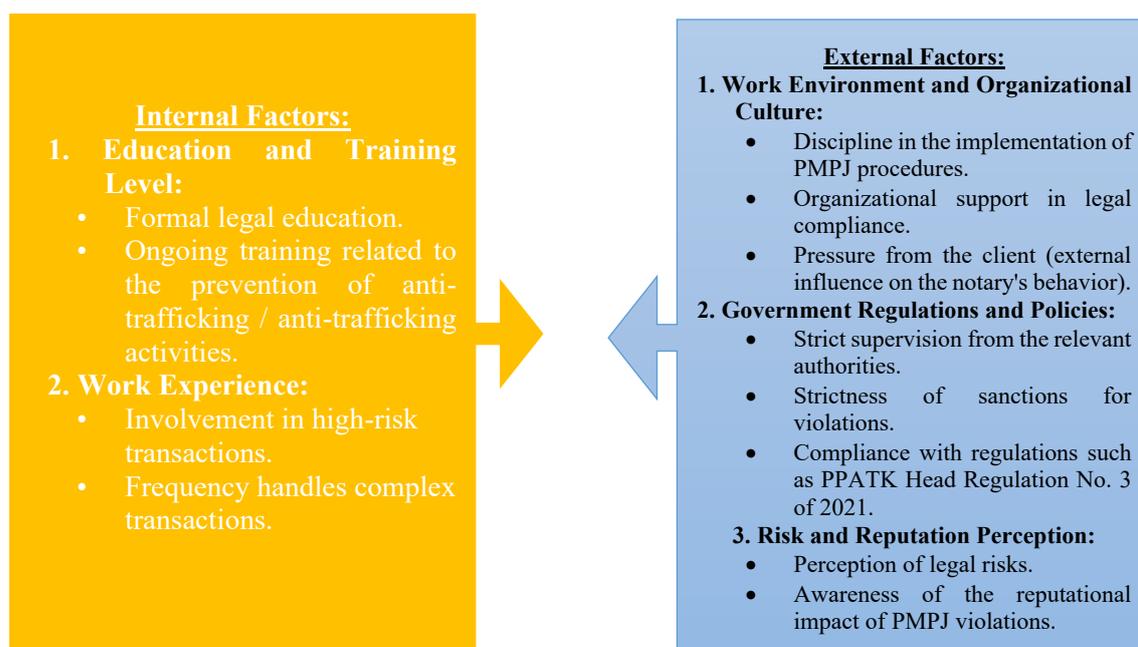


Figure 1. Internal and External Factors Affecting Notary Legal Awareness in the Application of the Principle of Recognizing Service Users (PMPJ)

Source: Interview with a notary²⁹

The factors that affect notary legal awareness in implementing the Principle of Recognizing Service Users (PMPJ) must be considered holistically because legal awareness is not the product of one aspect alone, but the result of complex interactions between various elements. Varying levels of legal awareness among notaries are often due to differences in access to education, professional experience, work environment, external pressures, and existing regulatory frameworks. Each of these factors influences each other and shapes how notaries understand, prioritize, and implement their legal obligations in their day-to-day practice. When one of the factors does not function optimally, it can create a gap in the

²⁹ Private Interviews with 50 notaries in the XYZ region, February 3, 2023;

implementation of PMPJ, which then increases the risk of financial crimes such as money laundering or terrorism financing through notary services.

A holistic approach requires an understanding that increased legal awareness cannot be achieved by simply fixing one factor separately. For example, providing better training without paying attention to the pressures the notary faces or without strengthening regulatory oversight may not result in significant change. Similarly, tightening regulations without providing adequate resources for implementation or without building a culture of compliance among notaries, will only result in a superficial or formalistic level of compliance. Therefore, any effort to increase legal awareness must include multiple dimensions—education, regulatory support, oversight, incentives, as well as changes in risk perceptions and professional ethics.³⁰

One effective approach to increasing legal awareness is through the development of education and training programs that focus not only on the technical aspects of PMPJ, but also on the formation of attitudes and values that support legal compliance. Training should be designed to address gaps in knowledge and understanding, as well as strengthen awareness of the legal and reputational consequences of violations.³¹ In addition, collaboration between supervisory authorities, notary professional associations, and educational institutions can create a curriculum that is more responsive to the challenges faced by notaries in the implementation of PMPJ.

On the regulatory side, the government needs to ensure that PMPJ regulations are clear, enforceable, and accompanied by an effective supervision mechanism. Strict supervision, accompanied by strict sanctions against violations, can encourage notaries to be more serious in implementing PMPJ. However, sanctions should not be the only tool; Incentives for compliance, such as rewards or recognition of notaries who demonstrate exceptional compliance, can also motivate positive behavior.³²

The work environment must also support the implementation of PMPJ. Providing adequate resources, such as access to technology that can facilitate the verification process of service users, as well as the creation of a work culture that respects integrity and legal compliance, is essential. Leaders in notary offices need to exemplify compliance and build an atmosphere where the implementation of PMPJ is seen as a shared responsibility, not just an administrative obligation.

Finally, the perception of risk and the value of professional ethics need to be strengthened. Notaries must understand that the legal and reputational risks of negligence in the implementation of PMPJ can have serious impacts, not only for them personally, but also for the profession and society as a whole. Ethics education and awareness campaigns that emphasize the importance of professional integrity in the prevention of financial crimes can help change the notary's view of PMPJ from mere formal compliance to an integral part of responsible legal practice.

By considering these factors holistically, efforts to increase legal awareness among notaries can be carried out more effectively, resulting in changes that are not only sustainable but also have a real impact in strengthening the national legal and financial system.

³⁰ Nida'an Havia, Galang Asmara, dan Muhaimin, "Sanctions for Notaries who Violate the Principle of Knowing the Users of Notary Services," *International Journal of Multidisciplinary* 9, no. 3 (2024): 43, <https://doi.org/10.31305/rrijm.2024.v09.n03.010>.

³¹ Nila Amalia, Syamsuddin Muchtar, dan Muhammad Ilham Arisaputra, "Obligation to Monitor Service User Transactions by a Notary As an Effort to Prevent and Eradicate the Crime of Money Laundering," *Scientific Journal of Advocacy* 12, no. 1 (2024): 27, <https://doi.org/10.36987/jiad.v12i1.4497>.

³² Muammar Gaddafi, Iskandar Muda, and Irwan Santosa, "Implementasi Hukum Prinsip Mengenali Pengguna Jasa Dilaksanakan Notaris Terhadap Pelaporan Transaksi Keuangan Mencurigakan Melalui Aplikasi Go-AML Berdasarkan Peraturan PPATK Nomor 3 Tahun 2021," *Jurnal Hukum dan HAM Wara Sains* 2, no. 09 (2023): 77, <https://doi.org/10.58812/jhhws.v2i09.614>.

Legal Consequences and Efforts to Increase Legal Awareness of Notaries in Applying the Principle of Recognizing Service Users

The legal consequences of notaries' legal awareness in implementing the Principle of Recognizing Service Users (PMPJ) are very significant and can have a wide impact, both for notaries individually and for the legal and financial system as a whole. When notaries have a high level of legal awareness and consistently implement PMPJ, they not only fulfill their legal obligations, but also contribute to financial crime prevention efforts, such as money laundering and terrorism financing. This helps maintain the integrity of the notary profession, protects the reputation of individual notaries, as well as ensures that the services they provide are not misused for illegal purposes. On the other hand, if notaries have low legal awareness and fail to implement PMPJ properly, they can face various serious legal consequences. Notaries who engage in or contribute, whether intentionally or not, in transactions used for money laundering or terrorism financing, may be subject to administrative, civil, and even criminal sanctions.³³

Article 7 and Article 8 of Law Number 8 of 2010 concerning the Prevention and Eradication of Money Laundering Crimes (TPPU Law), the reporting party who does not carry out the reporting obligation can be subject to administrative sanctions imposed by the respective supervisory authorities. For the notary profession, the supervision is under the authority of the Ministry of Law and Human Rights and the Notary Supervisory Council, which can provide written reprimands, guidance, and recommendations for revocation of practice licenses. In this context, administrative sanctions such as revocation of practice licenses, fines, or temporary prohibitions on practice can be imposed if it is proven that there is negligence or refusal to carry out reporting obligations. Ethical sanctions by professional organizations (such as the Indonesian Notary Association) are often the first step before formal legal proceedings are underway, especially if violations concern integrity or compliance with the code of ethics. In addition, civil sanctions can arise if a third party suffers losses due to the negligence of a notary, and criminal sanctions can apply if there is an element of intentionality in helping money laundering perpetrators. On the other hand, civil sanctions can arise from third-party lawsuits that are harmed due to the negligence of the notary in implementing PMPJ. Further, criminal consequences can include imprisonment if it is proven that the notary actively or negligently supported financial criminal activities. In addition, the failure of notaries in implementing PMPJ can also damage public trust in the notary profession in general, which in turn can weaken the legitimacy of the law in the eyes of the public. It also opens up opportunities for law enforcement to tighten regulations and supervision of the notary profession, which can increase the administrative burden and decrease the operational efficiency of compliant notaries. As a result, low legal awareness not only carries legal risks for notaries individually, but can also have much broader implications for the stability and integrity of the legal and financial system as a whole.³⁴

Efforts to increase notary legal awareness in implementing the Principle of Recognizing Service Users (PMPJ) require close collaboration between various parties who have a strategic role in the legal and financial ecosystem. One of the main responsible parties is the government, through supervisory and regulatory institutions such as the Ministry of Law and Human Rights, the Financial Services Authority (OJK), and the Financial Transaction Reporting and Analysis

³³ A Siddiqiyah, I Santosa, dan I Muda, "Notary's responsibilities in preventing the crime of money laundering by applying the principles of knowing the service user," *Journal of Science Info: Informatics and Science* 14, no. 1 (2024): 27, <https://ejournal.seaninstitute.or.id/index.php/InfoSains/article/view/4054%0Ahttps://ejournal.seaninstitute.or.id/index.php/InfoSains/article/download/4054/3348>.

³⁴ Andika Putra Eskanugraha and Rizky Eka Safitri Wirawan, "Peran Notaris dalam Prinsip Mengenali Pengguna Jasa Untuk Pencegahan Tindak Pidana Korupsi," *Jurnal Anti Korupsi* 13, no. 2 (2023): 101, <https://doi.org/10.19184/jak.v13i2.44873>; Havia, Asmara, dan Muhaimin, "Sanctions for Notaries who Violate the Principle of Knowing the Users of Notary Services," 22.

Center (PPATK). These institutions must ensure that regulations related to PMPJ are clear, accessible, and implemented consistently, and accompanied by strict supervision. The government also needs to provide ongoing training and socialization on the importance of PMPJ, especially in the context of preventing Money Laundering Crimes (TPPU) and Terrorism Financing Crimes (TPPT).

Notary professional associations, such as the Indonesian Notary Association (INI), also have a crucial role in this effort. They must be active in providing training and certification programs that promote a deep understanding of PMPJ, as well as encourage a culture of legal compliance among its members. In addition, legal education institutions also play a role in integrating PMPJ principles into the notary education curriculum, so that prospective notaries have a strong foundation from an early age regarding their responsibilities in mitigating the risk of financial crime.³⁵

No less important, notaries themselves must be proactively involved in increasing their legal awareness, for example by attending training, updating legal knowledge regularly, and building an ethical commitment to the implementation of PMPJ. Clients and the general public also play a role in creating social pressure for notaries to implement PMPJ correctly, through public awareness of the importance of a strict verification process. Thus, the collective efforts of the government, professional associations, educational institutions, notaries, and community support will create a conducive environment to increase legal awareness of notaries in implementing PMPJ, which will ultimately strengthen the national legal and financial system.

Conclusion

The implementation of the Principle of Recognizing Service Users (PMPJ) by notaries is a crucial step in supporting the prevention of Money Laundering Crimes (TPPU) and Terrorism Financing Crimes (TPPT). From the results of the study, it was found that notaries' legal awareness of PMPJ varies, ranging from the level of basic knowledge to a deeper understanding of regulations. However, despite the increased understanding, some notaries still face obstacles in applying this principle effectively in the field, especially in situations that require complex professional assessment. Thus, the relationship between legal knowledge, understanding, attitudes, and behaviors is the key to the successful implementation of PMPJ to prevent the risk of financial crime. Collective efforts are needed to strengthen the implementation of PMPJ by notaries. The government, professional associations, and legal education institutions must continue to play an active role in providing training, raising awareness, and forming a positive attitude towards legal compliance. In addition, with the existence of PPATK regulation Number 3 of 2021 concerning procedures for submitting LTKM through GoAML for the notary profession, it is hoped that notaries can be more proactive in reporting suspicious transactions and maintaining the integrity of the national financial system. This study recommends that the government, especially the Ministry of Law and Human Rights and the Center for Financial Transaction Reporting and Analysis (PPATK), together with professional organizations such as the Indonesian Notary Association (INI), organize ongoing training that is structured and relevant to the practice of implementing PMPJ. Supervision of the implementation of reporting obligations by notaries needs to be strengthened through a compliance audit mechanism and periodic coaching by the Notary Supervisory Council and related agencies, to ensure that PMPJ is carried out consistently and effectively.

³⁵ Pramadanty, "Form of Application of the Principle of Recognizing Service Users (Pmpj) by Land Deed Making Officials in Their Duties and Authorities," 34.

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