


Notary's responsibilities in preventing the crime of money laundering by applying the principles of knowing the service user

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Article Info	ABSTRACT
<p>Keywords: Responsibilities, Notaries, Money Laundering Crimes, Principles of Knowing Your Service User</p>	<p>The aim of this research is to determine and analyze the legal responsibilities of Notaries in applying the principle of getting to know the service user regarding the prevention of money laundering crimes as well as the legal consequences if the Notary does not apply it in relation to the deed he or she makes. Notaries have a big role and responsibility in carrying out legal actions because they must always act according to the principle, namely caution in making authentic deeds. Notaries must be able to examine all relevant facts in their considerations based on the applicable laws and regulations. This research uses normative legal research methods with an approach to laws and regulations, norms and doctrine as the main study. The results of the research show that the application of the principle of getting to know the service user by Notaries as regulated in Permenkumham Number 9 of 2017, which is another authority of Notaries which is regulated outside the UUJN which is obtained by attribution and this authority aims to contribute to the government in anticipating and eradicating money laundering crimes. in Indonesia. Because the application of the principle of getting to know the service user is an authority that must be implemented, the legal consequences if it is proven not to apply it will be subject to sanctions in accordance with the provisions of Article 85 UUJN.</p>
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INTRODUCTION

The crime of money laundering and terrorist financing is a global phenomenon that is detrimental to the entire international community. Considering that this has a very negative impact on the political and economic structure of a country, this is a crucial problem. Throughout its history, the results of this criminal act of blindness are closely related to other criminal acts in general, such as corruption, where the perpetrator of the criminal act of corruption then hides the proceeds of the assets/wealth that have been generated (dirty money) in organized ways. This is to ensure that the assets resulting from unlawful acts are not known and that some of the assets he owns appear to come from legitimate or legal business activities and aims to make it difficult for law enforcers to trace the assets

resulting from criminal acts. This action is included in the criminal activity of money laundering so that the criminal act of money laundering is considered a secondary crime, which means, "money laundering cannot occur if there is no main criminal act."

Based on data from Transparency International, Indonesia's Corruption Perception Index (CPI) is ranked 110th in 2022 on a global scale. Referring to Transparency International's findings, it is not wrong if Indonesia is categorized as a corrupt country. Then, the Financial Transaction Reports and Analysis Center (PPATK) has revealed that money laundering criminal cases (TPPU) reached IDR 183.88 trillion throughout 2022 with a total of 27,816,771 reports received.

In the context of preventing and eradicating the crime of money laundering, the Indonesian government is increasingly expanding the provisions for Whistleblowers in the context of preventing and eradicating the crime of money laundering by issuing Government Regulation Number 43 of 2015 which has been amended by Government Regulation Number 61 of 2021 concerning Reporting Parties in Prevention and Eradication of the Crime of Money Laundering which is an implementing regulation of Law Number 8 of 2010 concerning the Prevention and Eradication of the Crime of Money Laundering (UU TPPU). This law requires professionals to report criminal acts of money laundering to PPATK by mentioning "Advocate, Notary, Land Deed Official, Accountant, Public Accountant and Financial Planner as the Reporting Party", whereas previously this obligation only applied to financial service providers and goods and/or service providers. In Government Regulation Number 43 of 2015 which has been amended by Government Regulation Number 61 of 2021 concerning Reporting Parties in the Prevention and Eradication of the Crime of Money Laundering, it is explained that Notaries are also one of the professions designated as one of the reporting parties who are obliged to report Suspicious Financial Transactions to the Center. Financial Transaction Reporting and Analysis (hereinafter referred to as PPATK).

If a mistake is made by the Notary, the official who made the authentic deed, either intentionally or through negligence, and the loss results in loss to another party, then the Notary has committed a violation of the law. If the Notary's mistake is proven, the Notary may be subject to legal sanctions, including threats. As stated in Article 84 UUJN which states that "parties who are injured can ask the Notary for reimbursement of costs, compensation and interest."

The reason why Notaries are included in the category of reporting money laundering crimes is that the Notary profession is very vulnerable to money laundering crimes, because Notary services are used in carrying out asset sale and purchase transactions, making transaction agreements and liaising with service users in the business sector. Notaries play a very important role in declaring beneficial ownership. In the field of business law, what is meant by "Beneficial Ownership" is a situation where one party obtains benefits from ownership of certain property without being officially recognized as the owner. This action is also one way for someone to safeguard their assets by appointing a trust as the legal owner of those assets. Apart from that, users of Notary services can also smuggle illicit money by investing their money in ownership of corporate shares, by including their shares

or capital owned in the establishment of a Limited Liability Company (PT). Notary services in the form of making a company deed are required by someone who purchases shares as a method of money laundering, because usually the deed contains details regarding the procedures for transferring rights to shares.

Implementation of the Principle of Recognizing Service Users for Notaries or what is also known as PMPJ is part of the effort to detect the use of Notary services by TPPU perpetrators by identifying and verifying as well as monitoring transactions regarding the profile, source of funds and document identity of Notary service users as makers of evidence. in the form of an authentic deed. Notaries carry out identification by collecting information and identity documents for service users including individual service users, employment, NPWP, source of funds and business relationships or the purpose of transactions carried out by service users with Notaries. Identification of corporate service users includes the identity of the corporate service user, source of funds, business relationship or purpose of the transaction that the service user will carry out with the Notary, information on the appointed party who has the authority to act for and on behalf of the corporation as well as the beneficial owner of the corporation.

Based on the problems stated above, the aim of this research is to analyze the legal obligations and responsibilities of Notaries in implementing the principle of getting to know the service user regarding the prevention of money laundering crimes. To analyze the legal consequences for Notaries who do not apply the principle of recognizing service users in relation to the deeds they make.

METHOD

The method used to discuss this research is the descriptive analysis method. Analysis is used so that the author can organize this research in a systematic form so that it gets to the heart of the problem and obtains correct research results. The type of research in this legal research is normative juridical research, which has the aim and objective of studying applicable laws and regulations as well as theoretical studies from existing literature. In conducting this normative juridical research, theoretical approaches, methods, techniques and normative juridical analysis are used. In this case, secondary data obtained from the library is used, namely in the form of statutory regulations, normative legal theories and the opinions of leading scholars in the field of legal science. Library research is carried out by searching, collecting and examining library materials which are secondary data related to the title and main problem.

RESULTS AND DISCUSSION

Obligations of Notaries in Applying the Principle of Getting to Know the Service User Regarding Prevention of Money Laundering Crimes Obligations of Notaries According to the Law on Notary Positions and Other Laws

The obligations of a Notary are regulated in various laws, especially in the Notary Position Law in Indonesia, namely Law Number 2 of 2014 concerning Amendments to Law Number 30 of 2004 concerning the Position of Notaries (Notary Position Law).

In carrying out his office, a Notary has several obligations which are regulated in Article 16 of the Law on the Office of a Notary as follows: several relevant laws which may affect the obligations of a Notary are:

1) Civil Law (Burgerlijk Wetboek/BW)

The Civil Code (KUH Perdata) or BW regulates most of the principles of civil law in Indonesia. Notaries must ensure that the notarial deed they make complies with the provisions of civil law contained in the BW such as the conditions for the validity of agreements and other engagements.

2) Civil Procedure Law (Civil Procedure Code)

The Civil Procedure Code (KUHA Perdata) regulates the legal procedures that apply in civil disputes. Notaries may be involved in several stages of civil proceedings, such as the preparation of evidence, and must understand the rules that apply to such proceedings.

3) Land Law

Laws that regulate land, such as the Basic Agrarian Law (UUPA) and related regulations, will affect the obligations of Notaries in terms of making land deeds, transferring land ownership rights, and so on.

4) Taxation Law

Notaries must also pay attention to tax obligations related to the transactions and legal acts they record in the deed. This includes reporting transactions that may have tax impacts in accordance with applicable tax laws.

5) Law on the Eradication of Corruption Crimes

Laws in Indonesia, especially Law Number 20 of 2001 in conjunction with Law Number 31 of 1999 concerning the Eradication of Corruption Crimes (UU TPK), do not specifically regulate the role of Notaries in preventing criminal acts of corruption. The Corruption Crimes Law focuses more on aspects of criminal law and eradicating corruption as well as defining criminal acts of corruption and their sanctions. However, Notaries still have to comply with the Law which regulates the prevention of corruption and corrupt acts in carrying out their duties.

6) Law Number 8 of 2010 concerning Prevention and Eradication of the Crime of Money Laundering (UU Prevention and Eradication of Money Laundering)

Notaries have an obligation to comply with the Law on the Prevention and Eradication of TPPU and prevent suspicious transactions such as implementing the principle of recognizing service users. Notaries must provide data and information and even report suspicious transactions or actions to the competent authority, namely the Financial Transaction Reports and Analysis Center (PPATK). (Article 41 paragraph (1) Law on the Prevention and Eradication of Money Laundering in conjunction with Government Regulations(PP) No. 43 of 2015 which has been amended by PP Number 61 of 2021 concerning Reporting Parties in the Prevention and Eradication of Money Laundering)

- 7) Government Regulation (PP) no. 61 of 2021 regarding amendments to PP Number 43 of 2015 concerning Reporting Parties in the Prevention and Eradication of the Crime of Money Laundering

Notaries are obliged to report to the competent authorities if they find suspicious or unlawful actions or documents.

- 8) Minister of Law and Human Rights Regulation No. 9 of 2017 Implementation of the Principle of Getting to Know Service Users for Notaries

Obligations of Notaries in Implementing the Principle of Knowing the Service User for Notaries when carrying out their position in making authentic deeds.

Apart from the Laws mentioned above, Notaries must also pay attention to other regulations and laws that are relevant to the types of transactions and documents they handle. Therefore, Notaries must continue to update their knowledge of changes in applicable laws and regulations, and always maintain integrity, professionalism and compliance with all legal obligations.

Principles of Knowing Service Users by Notaries According to the Theory of Authority and the Theory of Position Secrets

Notaries as Public Officials have been entrusted with the authority to make authentic deeds along with other authorities, therefore, Notaries are required to carry out legal actions properly and correctly, such as deeds made in the presence or by the parties must fulfill all legal wishes and requests of the parties involved. interested. In order for the deed issued to be of quality in accordance with legal regulations and the wishes of the interested parties, the Notary must carry out his obligations as regulated in the provisions of Article 16 Paragraph (1) of Law Number 2 of 2014 concerning Amendments to Law Number 30 of 2004 Regarding the position of Notary, namely:

- a) Acting trustworthy, honest, thorough, independent, impartial, and safeguarding the interests of parties involved in legal actions;
- b) Make a deed in the form of a deed minute and save it as part of the Notary's protocol;
- c) Attach letters and documents as well as the applicant's fingerprints to the minutes of the deed;
- d) Issue grosse deeds, copies of deeds, or quotations of deeds based on minutes of deeds;
- e) Providing services in accordance with the provisions of this Law, unless there is a reason to refuse it;
- f) Keep everything regarding the deed he or she makes confidential and all information obtained for the purpose of making the deed in accordance with the oath/promise of office, unless the law stipulates otherwise;
- g) Binding the deeds made within 1 (one) month into a book containing no more than 50 (fifty) deeds, and if the number of deeds cannot be contained in one book, the deeds can be bound into more than one book, and record the number of minutes of the deeds , month and year of publication on the cover of each book;
- h) Make a list of deeds of protest against non-payment or non-receipt of securities;

- i) Make a list of deeds relating to wills in order of when the deeds were made each month;
- j) Send the list of deeds as referred to in letter i or the nil list relating to wills to the center for the list of wills at the ministry that handles government affairs in the legal sector within 5 (five) days of the first week of each following month;
- k) Record in the repertory the date of delivery of the list of wills at the end of each month;
- l) Have a seal or stamp containing the state symbol of the Republic of Indonesia and in the space surrounding it the name, position and place of office concerned are written;
- m) Reading the deed in front of the presenter in the presence of at least 2 (two) witnesses, or 4 (four) special witnesses for making a private will, and signed at that time by the presenter, witness and Notary; And
- n) Accepting prospective Notary internships. (Law Number 2 of 2014 concerning Amendments to Law Number 30 of 2004 concerning Notary Positions)

According to the Law on the Position of Notaries, one of the obligations of a Notary is to keep the contents of the deed confidential as clearly stated in Article 16 Paragraph (1) letter f of the Law on the Position of Notaries. Therefore, in the principle of secrecy, the position held by a Notary is also stated in a general provision, namely Article 170 Paragraph (1) of the Criminal Procedure Code (KUHP) which stipulates that "Those who because of their work, honor, dignity or their position is obliged to keep secrets, they can ask to be released from the obligation to give information as a witness, namely about matters entrusted to them." And it is also stated in Article 1909 paragraph (3) of the Civil Code (KUHPerdata) which contains "Everyone who, because of his or her position, work or position, is obliged by law to keep something confidential, but only regarding matters whose knowledge was entrusted to him as such."

Other provisions regarding the secrecy of the Notary's position are also regulated in Article 54 UUDN which states that: "A notary can only give, show or inform the contents of the deed, gross deed, copy of the deed or excerpt of the deed, to people who have a direct interest in the deed, the heirs or the person who obtains the right, except for other provisions of the Law." With the existence of norms or principles for Notaries regarding the obligation to keep confidential all substances contained in deeds and other information related to deeds made by Notaries, it provides opportunities for perpetrators of criminal acts to utilize the services of Notaries in carrying out or justifying the proceeds or assets obtained. obtained from criminal acts or is called money laundering.

In order to protect the professional services utilized by Money Launderers, Government Regulation Number 43 of 2015 was issued which has been amended by Government Regulation Number 61 of 2021 concerning Reporting Parties in the Prevention and Eradication of Money Laundering Crimes in Article 3 including Advocates, Notaries, Land Deed Making Officials. , Accountants, Public Accountants and Financial Planners have been listed as new reporting parties. So it is hoped that the professional services mentioned above can play an active role as Reporting Parties to prevent and eradicate criminal acts of money laundering and terrorism financing.

Government Regulation Number 43 of 2015 concerning Reporting Parties in the Prevention and Eradication of the Crime of Money Laundering is an implementing regulation of Article 17 Paragraph (2) of Law Number 8 of 2010 concerning Prevention of Eradication of the Crime of Money Laundering which reads "Provisions regarding Reporting Parties other than as intended in paragraph (1) is regulated by Government Regulation". If we use Hans Kelsen's opinion, even though the TPPU Reporting Regulation is lower than the Law on Notary Positions, reporting suspicious financial transactions is a direct mandate from Law Number 8 of 2010 concerning Prevention of Eradication of the Crime of Laundering.

Analysis of Obligations for Implementing the Principles of Getting to Know the Service User by Notaries

Regarding the Notary's obligations in implementing getting to know service users, the following are several techniques that have been regulated based on regulations and circulars, namely:

- a. Regulation Number 11 of 2016 Head of the Center for Financial Transaction Reporting and Analysis concerning Procedures for Reporting Suspicious Financial Transactions for the Professional. The obligation to submit Suspicious Financial Transaction reports is regulated in several parts of this regulation. The regulation also regulates the procedures for the registration process, completing reports, appointing reporting officers, and submitting reports. The report can be submitted electronically through the GRIPS program, or can be submitted manually without using technology or non-electronics.
- b. Regulation of the Head of the Center for Financial Transaction Reporting and Analysis Number: Per-14/1.02/PPATKI/11/14 concerning the Imposition of Administrative Sanctions for Violations of Reporting Obligations states that the designated reporting party will be subject to administrative sanctions if it does not carry out the obligation to report suspicious and violating financial transactions. these obligations. Depending on the violation committed, this administrative sanction may take the form of an administrative fine and/or a written warning.
- c. Circular Letter Number 02 of 2019 concerning Guidelines for Professionals Regarding Submission of Suspicious Financial Transaction Reports and Application of the Principles of Recognition of Service Users. Based on Perka Number 11 of 2016, this circular letter outlines the procedures for implementing the obligation to implement the Principles of Recognizing Service Users at PPATK. Consisting of procedures for submitting reports which must also meet requirements, such as paying sales and purchase tax on behalf of certain individuals, as stated in Article 3 paragraph (1) of Perka No. 11 of 2016, as well as the PPTPPU Law and PP Number 43 of 2015.
- d. Circular No. AHU.UM.01.01-1232 Concerning Notary Implementation Guidelines Concerning Recognition of Service User Principles provides strict guidelines for Notaries stating that their offices must create internal policies in the context of implementing the Recognizing Service User Principles.

Then set out the steps that must be taken to apply these principles, which are as follows:

1) Identification with Service Users

Identification of service users is carried out through collecting service user information which includes: Persons/Individuals, Corporations, Engagements.

2) Communication with Service Users

- The Notary is obliged to inform that the Notary requires information regarding the implementation of PMPJ.
- The Notary determines the position of the service user, or whether the Notary services user is in the context of implementing PMPJ.

3) Service User Risk Analysis

- The risk level grouping for Money Laundering is in the Low category.
- The risk level grouping for Money Laundering is in the Medium category.
- The risk level grouping for Money Laundering is in the High category.

4) Implementation of the Principle Procedure of Getting to Know Service Users based on the Risk Level of Money Laundering Crimes.

Request information and identity documents for service users provided that they act for themselves and act for the beneficial owner/BO. The process of requesting information and filling out document forms is in accordance with the risk level of Money Laundering Crimes.

- Low risk means that a simple process of getting to know service users is carried out, which at least includes full name, population identity number, driving license, place and date of birth, address listed on the identity card.
- Medium Risk means that the Principle of Getting to Know the Service User process is carried out by filling in a form which includes at least Full Name, Population Identification Number/Passport, Legal Entity Legalization Decree, Place and Date of Birth, Citizenship, Form of Legal Entity, Field of Business, Address listed in Identity Card, Employment, Source of Funds, Purpose of Transaction, Written Statement from the service user regarding the correctness of Identity and Source of Funds.
- High Risk, namely the process of Getting to Know Your Service Users In-depth by carrying out further supervision and filling out a form which at least includes Full Name, Population Identification Number/Passport, Legal Entity Legalization Decree, Place and Date of Birth, Citizenship, Form of Legal Entity, Field Business, Address stated on the Identity Card, Occupation, Source of Funds, Purpose of Transaction, Written Statement from the service user regarding the correctness of Identity and Source of Funds.

5) Inspection of Service User Documents

- The notary must examine the deed and other documents from the service recipient.
- Documents can be formatted into Original and Copies.

- Document inspection must be reported to the Financial Transaction Analysis Reporting Center (PPATK) no later than 3 days after receiving the official request letter
- 6) Update of Service User Information and Documents
 - The notary is aware of changes in service user data.
 - Notaries are obliged to obtain information from service users.
 - The notary must re-compile the document as a result of updating the document information.
- 7) Reporting to PPATK
 - The notary is obliged to report when the business relationship with the service user is terminated due to the service user's refusal to follow the Know Your Service User Principles procedure.
 - The notary doubts the veracity of the information provided by the service user.
 - Notary discovers suspicious financial transactions.
 - Notaries are required to report to PPATK

Legal Consequences for Notaries Who Do Not Apply the Principle of Recognizing Service Users Regarding the Deeds They Make Legal Protection for Notaries as Reporting Parties in Preventing Money Laundering Crimes

From the perspective of the legal protection theory that the author uses, the Regulation of the Minister of Law and Human Rights of the Republic of Indonesia Number 9 of 2017 is a preventive legal protection that the government can provide to Notaries in carrying out their obligations to report criminal acts of money laundering. Because the Regulation of the Minister of Law and Human Rights of the Republic of Indonesia Number 9 of 2017 requires a Notary to report transactions carried out by clients or users of their services to the PPATK, this is also an exception to the implementation of official secrecy.

Apart from that, the Notary himself must continue to apply the principle of prudence, including the application of the principle of getting to know the service user as a preventive measure that can be carried out by a public official himself in every authentic deed or other legal action to avoid being involved in the crime of laundering. money and other legal problems that arise in the future. In-depth identification, verification and validation of data and information from users of Notary services carefully and carefully, without rushing to fulfill the technical requirements for making a deed is an implementation of the precautionary principle.

Legal Consequences for Notaries Who Do Not Apply the Principle of Getting to Know the Service Users Regarding the Deeds They Make

Because of this great responsibility, a Notary is required to carry out his position in accordance with what has been determined by law, one of which is the application of the principle of getting to know the service user in making the deed related to the Notary's performance as the reporting party in the crime of money laundering. The authority of Notaries to apply the Know Your Service User Principles imposed on them is one of the Government's efforts to anticipate the occurrence of increasingly widespread criminal acts of money laundering. The principle of Knowing Your Service Users that is applied is used

for the needs of the parties and to protect Notaries so that in carrying out their professional position they are not misused or taken advantage of by service users who wish to transfer transactions into authentic deeds so that they are formalized in the form of legal entities or other business entities.

In principle, PMPJ is a tool for preventing violations that could be caused by clients, such as TPPU. Therefore, PMPJ is present as a form of guidance to protect Notaries from legal impacts that are detrimental to Notaries. Because it is like two sides of a coin, not all users of Notary services who come to them to carry out transactions or contracts are based on good faith. Sometimes contracts carried out by a Notary with users of his services are sometimes tripped up in the form of criminal acts of money laundering. Of course, on this basis, the situation becomes more complicated so that the parties involved, including the notary, have to deal with the law, where the true law must be upheld regardless of anything (rule of law).

Then the active nature in Article 607 paragraph (1) letter b is that a person knows or is reasonably suspected of knowing that an asset is the subject of the crime of money laundering and the person is determined to hide or disguise the origin, location, source, designation, transfer of rights. or actual ownership. This means that the Notary actively participates in the success of the Crime of Money Laundering when the Notary hides or disguises the origin, location, source, allocation, transfer of rights or actual ownership of assets.

The sentences "receive" and "control" are interpreted as sentences that have a passive meaning in the crime of money laundering. The passive role in a criminal act cannot be separated from the equivalence theory which states that between active conditions and passive conditions there is a bound relationship where the causal relationship of negative (passive) behavior can also give rise to certain circumstances in which there is an external relationship between active behavior and passive role so that a certain event or condition occurs.

So from the narrative above it can be concluded that the sentence plays a passive role here when the Notary knows or is reasonably suspected of knowing that the client who came to his office has committed a criminal act and wants to make a transaction, then the Notary's knowledge is not followed up by the Notary in accordance with the applicable procedures in Circular Letter Number AHU .UM. 01-01-1232 concerning Guidelines for Implementing the Principles of Recognizing Service Users for Notaries so that Notaries receive proceeds or honoraria from their clients who are suspected of being the Crime of Money Laundering. This means that here the Notary also passively participates in covering up the results of Money Laundering Crimes committed by his clients, making it difficult for authorized officers to trace their financial transactions.

It is possible that sometimes Notaries are negligent in implementing PMPJ, which has legal consequences based on Article 30 paragraph (1) of Permenkumham No. 9 of 2017 that Notaries who do not implement PMPJ may be subject to administrative sanctions. Furthermore, Article 30 paragraph (2) explains that the types and procedures for imposing sanctions are carried out based on the provisions of laws and regulations regarding

notaries, namely Law Number 30 of 2004 which has been amended by Law Number 2 of 2014 concerning the Position of Notaries.

Sanctions imposed on a Notary are regulated in Article 85 UUJN which states several sanctions, namely in the form of:

1. Verbal warning;
2. Written warning;
3. Temporary suspension;
4. Dismissal with honor; or
5. Dishonorable discharge.

Law Number 8 of 2010 concerning Prevention and Eradication of the Crime of Money Laundering is the basis for the formation of Ministerial Regulation Number 9 of 2017 and Government Regulation Number 43 of 2017. As stated in Article 18 Paragraph 2 of the PPTPPU Law and Article 17 Paragraph 2 which regulates expanding the concept of TPU reporting and making it into implementing regulations which are then regulated in Government Regulation Number 43 of 2017 concerning whistleblowers in TPPU, the TPU Law strictly regulates the obligation to implement the principle of getting to know the service user by the reporting party.

However, in reality, in carrying out his position, a Notary only follows the wishes of the parties whose wishes require legal certainty so that it is stated in a deed by the Notary. So, if there is a problem in the deed made by the Notary, it is not an obligation of the Notary who must be responsible as long as the Notary has also carried out the deed in accordance with the procedures of the Law on Notary Positions, according to the code of ethics and other laws, one of which is the application of the principle of knowing service users by a Notary whose procedures have been explained in the previous sub-chapter or briefly, the Notary has carried out at least identification, verification and monitoring of service user transactions and reporting or filling in reports on transactions involved with service users who have fulfilled the reporting requirements as stated in regulated in government regulations to the PPATK through the Go Anti Money Laundering (GoAML) reporting application.

CONCLUSION

Regarding the prevention and eradication of the crime of money laundering, Notaries as reporting parties are clearly written in Government Regulation Number 43 of 2015 which explains that Notaries are required to apply the Principle of Knowing the Service User in accordance with Minister of Law and Human Rights Regulation Number 9 of 2017 in supporting the implementation of the government program. . Because of law Notaries who do not apply the principle of getting to know the service user in getting to know the complainants can be subject to sanctions in accordance with Article 30 PP Number 9 of 2017 which states regarding sanctions for reporting parties, especially Notaries who do not implement the principle of getting to know the service user will be subject to sanctions in accordance with the provisions of the law. regarding notary. The sanctions regulated in Article 85 UUJN state several sanctions, namely in the form of a verbal warning, written

warning, temporary dismissal, honorable dismissal and even dishonorable dismissal. The Notary is not responsible or cannot be subject to sanctions for the occurrence of Money Laundering Crimes committed by the person or service user as long as the Notary in the process of making the deed complies with or fulfills the Standard Operating Procedures (SOP) of the Law in accordance with Article 1868 of the Law. Civil Code, Notary Code of Ethics and has also implemented the principle of getting to know the service user.

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