

Strengthening Notary Reporting Obligations to Prevent Money Laundering in Property Transactions

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Abstract

Money laundering through property transactions poses a significant threat to Indonesia's legal system and economic integrity due to the high value and complex nature of real estate dealings. Notaries, as public officials authorized to draft authentic deeds and verify legal transactions, occupy a strategic position in detecting and preventing money laundering activities. This study aims to analyze the role of notaries in preventing money laundering in property transactions through the reformulation of reporting obligations. The research employs a normative legal method using statutory and conceptual approaches by examining Law Number 8 of 2010 on the Prevention and Eradication of Money Laundering, Law Number 2 of 2014 on the Position of Notaries, and PPATK Regulation Number 3 of 2021 concerning reporting procedures for certain professions. The findings reveal that although the legal framework clearly establishes notaries as reporting parties, implementation remains ineffective due to internal obstacles such as limited technical understanding and conflicts with professional secrecy, as well as external obstacles including weak coordination with PPATK and insufficient legal protection for reporting notaries. This study concludes that reformulating reporting obligations is necessary through clearer normative positioning of notaries, simplified and digitized reporting mechanisms, strengthened legal protection, and continuous professional training. Optimizing these aspects will enhance the preventive function of notaries and significantly contribute to national efforts to combat money laundering in the property sector.

Keywords: Notary; Money Laundering; Property Transactions; Reporting Obligations; Regulatory Reformulation.

Abstrak

Pencucian uang melalui transaksi properti menimbulkan ancaman signifikan bagi sistem hukum dan integritas ekonomi Indonesia karena nilai tinggi dan sifat transaksi real estat yang kompleks. Notaris, sebagai pejabat publik yang berwenang menyusun akta otentik dan memverifikasi transaksi hukum, menempati posisi strategis dalam mendeteksi dan mencegah kegiatan pencucian uang. Penelitian ini bertujuan untuk menganalisis peran notaris dalam pencegahan pencucian uang dalam transaksi properti melalui perumusan ulang kewajiban pelaporan. Penelitian ini menggunakan metode hukum normatif menggunakan pendekatan perundang-undangan dan konseptual dengan meneliti Undang-Undang Nomor 8 Tahun 2010 tentang Pencegahan dan Pemberantasan Pencucian Uang, Undang-Undang Nomor 2 Tahun 2014 tentang Jabatan Notaris, dan Peraturan PPATK Nomor 3 Tahun 2021 tentang tata cara pelaporan untuk profesi tertentu. Temuan tersebut mengungkapkan bahwa meskipun kerangka hukum dengan jelas menetapkan notaris sebagai pihak pelapor, implementasi tetap tidak efektif karena kendala internal seperti keterbatasan pemahaman teknis dan konflik dengan kerahasiaan profesional, serta kendala eksternal termasuk lemahnya koordinasi dengan PPATK dan perlindungan hukum yang tidak



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memadai bagi pelapor notaris. Studi ini menyimpulkan bahwa merumuskan ulang kewajiban pelaporan diperlukan melalui pemosisan normatif notaris yang lebih jelas, mekanisme pelaporan yang disederhanakan dan digital, penguatan perlindungan hukum, dan pelatihan profesional yang berkelanjutan. Mengoptimalkan aspek-aspek ini akan meningkatkan fungsi pencegahan notaris dan berkontribusi secara signifikan pada upaya nasional untuk memerangi pencucian uang di sektor properti.

Kata kunci: Notaris, Pencucian Uang; Transaksi Properti; Kewajiban Pelaporan; Perumusan Ulang Peraturan.

INTRODUCTION

The increasing trend of money laundering through the property sector is a serious concern in Indonesia.¹ The property sector is often exploited by criminals due to its high value, ease of transfer, and difficulty in quickly tracing.² Money laundering in this sector involves purchasing property with proceeds of crime and then reselling it for seemingly legitimate profits.³ This phenomenon urges strict oversight, particularly at transaction stages involving legal professionals such as notaries. The involvement of notaries does not constitute participation in the crime, but their strategic role makes them at the forefront of detecting suspicious transactions.⁴

The strategic role of notaries lies in their authority to create authentic deeds, which serve as strong evidence of a transaction.⁵ Notaries witness, record, and formalize the agreements of the parties, thus having direct access to detailed transaction information.⁶ In property transactions, notaries are in a position to assess whether the transaction has suspicious characteristics.⁷ Because of this, notaries are under the group of occupations that must notify the Financial Transaction Reports and Analysis Center (PPATK) of any questionable transactions. This strategic position carries both legal consequences and an ethical responsibility for notaries to prevent them from becoming passive conduits for money laundering.⁸

Law Number 8 of 2010 concerning the Prevention and Eradication of Money Laundering specifically states that suspicious transactions must be reported. Article 17 of

¹ Saptono Saptono et al., “Analisis Yuridis Perkembangan Tindak Pidana Pencucian Uang Saat Ini Sebagai Upaya Pencegahannya Di Indonesia,” *Jurnal USM Law Review* 7, no. 2 (2024): 622–33.

² Devi Devi and Rizqy Syailendra, “Upaya Notaris Dan Ppat Terhadap Tindak Pidana Pencucian Uang Atas Pembelian Tanah Dan Properti,” *Jurnal Multidisiplin Indonesia* 2, no. 10 (2023): 3497–504.

³ L. Anggun, “Perkembangan Kejahatan Tindak Pidana Pencucian Uang dan Tindak Pidana Pendanaan Terorisme (TPPU dan TPPT) di Masa Pandemi Covid-19,” *Technology and Economics Law Journal* 1, no. 1 (2022): 5.

⁴ Muhammad Bintang Naufaldy and Gandjar Laksmana Bonaparta, “Peran Notaris Sebagai Pihak Pelapor dalam Pencegahan dan Pemberantasan Tindak Pidana Pencucian Uang,” *Unes Law Review* 6, no. 2 (2023): 4802–16.

⁵ Abwabur Rezeki Ghani et al., “Peran Notaris Dalam Pembuatan Akta Otentik Dan Dampaknya Terhadap Keabsahan Hukum Di Indonesia,” *Indonesian Journal of Islamic Jurisprudence, Economic and Legal Theory* 3, no. 2 (2025): 1574–82, <https://doi.org/10.62976/ijijel.v3i2.1147>.

⁶ M.Fathul Ilmi et al., “Peran Notaris Dalam Perlindungan Hukum Terhadap Para Pihak Dalam Perjanjian Jual Beli Tanah,” *Indonesian Journal of Islamic Jurisprudence, Economic and Legal Theory* 3, no. 2 (2025): 1954–62, <https://doi.org/10.62976/ijijel.v3i2.1197>.

⁷ R. Saputra, “Perlindungan Hukum Notaris atas Kewajiban Menerapkan Prinsip Mengenali Pengguna Jasa (PMPJ) dan Laporan Transaksi Keuangan Mencurigakan (LTKM),” *Jurnal Hukum Caraka Justitia* 4, no. 2 (2024): 123–37.

⁸ Muhammad Raditya Pratama Ibrahim and Amad Sudiro, “Kewenangan dan Perlindungan Hukum Bagi Notaris Sebagai Pihak Pelapor Transaksi Mencurigakan,” *Masalah-Masalah Hukum* 51, no. 2 (2022): 188–98, <https://doi.org/10.14710/mmh.51.2.2022.188-198>.

this law mandates that reporting parties, including certain professions, must report to the PPATK if they discover transactions suspected of being related to money laundering.⁹ These reports must be submitted in a timely, complete, and accurate manner to support prevention efforts. Failure to fulfill this reporting obligation can potentially result in administrative and criminal sanctions. This regulation demonstrates the explicit recognition of the role of legal professions, such as notaries, within the national legal framework to prevent the circulation of illicit funds.¹⁰

A frequently occurring problem is the weak implementation of reporting obligations by notaries. Several contributing factors include a lack of technical understanding, concerns about violating the principle of professional confidentiality, and minimal coordination with the Financial Transaction Reports and Analysis Center (PPATK). The absence of an effective internal oversight mechanism within notary professional organizations also exacerbates the situation. Consequently, opportunities to detect and disrupt the flow of proceeds of crime are reduced. This situation has the potential to be exploited by criminals who understand the oversight gaps in the property sector.

Money laundering is defined as any act of placing, transferring, spending, donating, entrusting, exchanging, or otherwise engaging in assets known or reasonably suspected to originate from criminal acts in order to conceal their origin, as stated in Article 1, point 1 of Law No. 8 of 2010.¹¹ This definition encompasses a wide range of activities that can be conducted through property. The flexible and high-value nature of property makes it ideal for use in the disguise or integration of illicit funds. Understanding this definition is crucial so notaries can recognize patterns that lead to money laundering from the outset.

Placement, layering, and integration are the general steps of money laundering. Placement is the initial stage when the proceeds of crime are introduced into the financial or economic system.¹² Layering involves separating the funds from their source through a series of complex transactions, including property sales.¹³ When criminal proceeds re-enter the formal sector with the appearance of legitimacy, it is known as integration. Property transactions are often used in the layering and integration stages because of their high value and the ability to facilitate the disguise of funds.¹⁴ The notary's position in the legal process of buying and selling property puts him in a strategic position to detect this stage.

The role and authority of notaries are regulated in Law No. 2 of 2014, which states that notaries are authorized to draw up authentic deeds and are obligated to maintain the

⁹ Sri Cici Nainggolan and Yudi Kornelis, "Tinjauan Yuridis Upaya Pencegahan Dan Pemberantasan Tindak Pidana Pencucian Uang Berdasarkan Undang-Undang Nomor 8 Tahun 2010," *Judge: Jurnal Hukum* 5, no. 02 (2024): 172–81.

¹⁰ Alifa Alifa et al., "Peran Notaris sebagai Pihak Pelapor dalam Pencegahan Tindak Pidana Pencucian Uang," *Jurnal Sosial Teknologi* 4, no. 12 (2024): 1018–26, <https://doi.org/10.5918/jurnalsostech.v4i12.31740>.

¹¹ R. Wiyono, *Pembahasan Undang-Undang Pencegahan dan Pemberantasan Tindak Pidana Pencucian Uang* (Sinar Grafika, 2022).

¹² U. Sumarwan, "Pencucian Uang dalam Perdagangan Narkoba: Studi Tinjauan Kriminologis," *IKRA-ITH Humaniora: Jurnal Sosial dan Humaniora* 8, no. 2 (2024): 140–47.

¹³ Sapto Handoyo Djarkasih Putro et al., "Analisis Tindak Pidana Pencucian Uang Pasif dalam Undang-Undang tentang Pencegahan dan Pemberantasan Tindak Pidana Pencucian Uang," *PALAR (Pakuan Law Review* 10, no. 3 (2024): 28–39.

¹⁴ Ali Geno Berutu, "Tindak Pidana Kejahatan Pencucian Uang (Money Laundering) dalam Pandangan KUHP dan Hukum Pidana Islam," *Tawazun: Journal of Sharia Economic Law* 2, no. 1 (2019): 1–18.

confidentiality of these deeds.¹⁵ Notaries have full access to the identity data of the parties, the source of funds, and transaction details.¹⁶ This position makes notaries part of the professional reporting party as referred to in the TPPU Law. This obligation is not merely administrative, but is a strategic instrument for preventing criminal acts. This regulation emphasizes that notaries play a role not only in legal aspects but also in the security of the national financial system.¹⁷

Reporting obligations for notaries are technically regulated in PPATK Regulation No. 3 of 2021 concerning Procedures for Submitting Reports for Certain Professions. This regulation provides guidelines for notaries in identifying, verifying, and reporting suspicious transactions. Reporting includes transactions that exceed a certain limit or indicate irregularities.¹⁸ The application of the Know Your Customer Principle is an inherent obligation to ensure that reporting is targeted.¹⁹ With these guidelines, notaries have a clear legal basis for submitting information to PPATK without violating their professional obligations.

Crime Prevention Theory provides a conceptual foundation that prevention is more effective when carried out before a crime occurs.²⁰ The application of this theory to the role of notaries emphasizes the need for early detection and prompt reporting of suspicious transactions. Early prevention reduces the risk of money laundering, which is difficult to trace once funds enter the legal system. Strengthening reporting mechanisms by notaries aligns with this principle of prevention. The active role of notaries will deter criminals attempting to exploit loopholes in the property sector.

Role Theory explains that every profession has social and legal expectations that must be met.²¹ Notaries, as public officials, have a role that goes beyond drafting deeds, namely, maintaining the integrity of the legal system. These expectations include fulfilling reporting obligations under the Money Laundering Law. Failure to comply with this role will disrupt the oversight function of property transactions and undermine efforts to eradicate money laundering. This theory emphasizes that optimizing the role of notaries does not only depend on written rules, but also on professional awareness.

Soerjono Soekanto's Theory of Legal Effectiveness assesses the success of legal implementation based on legal substance, the culture and organization of the law.²² The clarity of the reporting rules controlling notaries has an impact on legal substance. Notary organizations and monitoring groups like the Financial Transaction Reports and Analysis

¹⁵ Wahyu Satya Wibowo et al., "Integritas Notaris Sebagai Pejabat Pembuat Akta Autentik dalam Undang-Undang Jabatan Notaris," *Recital Review* 4, no. 2 (2022): 323–52, <https://doi.org/10.22437/rr.v4i2.18861>.

¹⁶ S. Abdillah, *Notaris dan Akta: Teori dan Praktik dalam Hukum* (CV Seribu Bintang, 2025).

¹⁷ Muhammad Afdal Zikri et al., "Tantangan Dan Peluang Profesi Notaris Diera Digital," *Indonesian Journal of Islamic Jurisprudence, Economic and Legal Theory* 3, no. 2 (2025): 2040–46.

¹⁸ Alifa et al., "Peran Notaris sebagai Pihak Pelapor dalam Pencegahan Tindak Pidana Pencucian Uang."

¹⁹ Rina Waliya Nuraini et al., "Mekanisme pencegahan tindak pidana pencucian uang berbasis know your customer (kyc) dalam implikasi dan resolusi hukum perbankan," *Jurnal Inovasi Hukum dan Kebijakan* 5, no. 4 (2024): 239–56.

²⁰ Numan Sofari Hafid et al., "Penerapan Teori Pidana Dalam Pencegahan Dan Penanggulangan Kriminalitas: Studi Kasus Dan Tantangan Implementasi," *Jurnal Perundang Undangan Dan Hukum Pidana Islam* 10, no. 1 (2025): 85–104.

²¹ E. Suhardono, *Teori Peran: Konsep, Derivasi, dan Implikasi di Era Transformasi Sosio-Digital* (Zifatama Jawara, 2025).

²² G. Orlando, "Efektivitas Hukum dan Fungsi Hukum di Indonesia," *Tarbiyah bil Qalam: Jurnal Pendidikan Agama dan Sains* 6, no. 1 (2022).

Center (PPATK) are part of the legal system. The awareness and willingness of notaries to report questionable transactions is a matter of legal culture. The combination of these three factors will determine the effectiveness of notaries' reporting obligations. An imbalance in any one factor will hinder the achievement of the goal of preventing money laundering.

RESEARCH METHODS

This work employs normative legal research using a conceptual and statutory approach as its research methodology. In particular, the provisions found in Law Number 8 of 2010 concerning the Prevention and Eradication of Money Laundering Crimes, Law Number 2 of 2014 concerning the Position of Notaries, and PPATK Regulation Number 3 of 2021 concerning Procedures for Submitting Reports for Certain Professions are examined in detail using the statutory regulatory approach. Analysis is conducted on the substance of the norms, the scope of reporting obligations, implementation mechanisms, and sanctions for violations of these obligations. The conceptual approach is used to understand relevant concepts such as the crime of money laundering, notary authority, official secrecy, reporting obligations, as well as legal theories underlying crime prevention and legal effectiveness. Primary legal materials like laws and implementing regulations, secondary legal materials like books, journals, and earlier research findings, and tertiary legal materials like legal dictionaries and encyclopedias comprise the research data sources. The analysis was conducted qualitatively by interpreting applicable legal provisions, linking them to legal doctrine and concepts, and identifying gaps or weaknesses in implementation. The results of the analysis are used to formulate recommendations for reformulating reporting obligations that can strengthen the role of notaries in preventing money laundering crimes in the property sector.

RESULTS AND DISCUSSION

Legal Analysis of the Role of Notaries in Preventing Money Laundering in Property Transactions

Law Number 8 of 2010 concerning the Prevention and Eradication of Money Laundering specifically regulates the role that several professions play in preventing money laundering. Reporting parties must notify the Financial Transaction Reports and Analysis Center (PPATK) of any questionable financial transactions, according to Article 17, paragraph (1). According to paragraph (2) of Article 17, reporting parties include companies that offer financial services as well as companies that sell goods and/or other services, including certain professions further regulated by law. Notaries fall within this specific professional category and are therefore subject to reporting obligations. This affirmation positions notaries not only as public officials who issue deeds but also as part of the national anti-money laundering system.

Article 23 of Law Number 8 of 2010 reinforces this reporting requirement, stating that any reporting party who learns of a suspicious financial transaction must notify the PPATK about the transaction within three (3) working days after learning of it. This article contains strict time-bound obligations, meaning notaries must have a fast and accurate detection and information collection system. Timely reporting is crucial for the Financial Transaction Reports and Analysis Center (PPATK) to promptly conduct analysis and prevent further money laundering. Delays in reporting can result in the proceeds of crime being transferred to other parties or entering the formal financial system.

Article 24 of Law No. 8 of 2010 governs sanctions for reporting parties who disregard these duties. According to this article, reporting parties risk administrative

measures such as written warnings, fines, suspension of business operations, or revocation of business licenses if they willfully neglect to notify the PPATK of questionable financial transactions. Furthermore, criminal provisions may be applied if such non-compliance results in money laundering. For notaries, these consequences not only impact administrative aspects and professional reputation but can also affect the continuity of their practice.

Law No. 2 of 2014 concerning Amendments to Law No. 30 of 2004 respecting the Office of Notaries regulates the extent of notary jurisdiction pertinent to real estate transactions. A notary public has the power to draft authentic deeds pertaining to any acts, agreements, and stipulations that are mandated by law or that interested parties wish to be included in an authentic deed, according to Article 15, paragraph (1). In property transactions, this authority includes the preparation of deeds of sale and purchase, deeds of gift, deeds of inheritance, and other legal documents that could potentially be used to detect indications of money laundering. This position gives notaries full access to data that can be used to detect indications of money laundering.

Laws and regulations pertaining to money laundering as well as professional discipline provisions may be cited in the legal ramifications of notaries not fulfilling their reporting requirements. According to Law No. 2 of 2014's Article 16 paragraph (1) letter a, notaries must act truthfully, completely, independently, and impartially while protecting the interests of the parties involved in drafting deeds. Failure to comply with the reporting obligation may be considered a violation of the principle of due diligence and impartiality, which could result in sanctions from the Notary Honorary Council. Furthermore, failure to comply that results in money laundering crimes can expand the notary's criminal liability.

The basis for reporting by certain professions is technically regulated through PPATK Regulation Number 3 of 2021 concerning Procedures for Submitting Reports for Certain Professions. Article 2, paragraph (1) of this regulation states that certain professions are required to submit reports of suspicious financial transactions, cash financial transaction reports, and/or cross-border fund transfer reports to PPATK. Notaries are included in certain professions as regulated in Article 1, number 2 of the regulation. This provides legal certainty that notaries have a formal and procedural obligation to report transactions potentially related to ML.

The identification and verification mechanism for service users is regulated in Article 5 of PPATK Regulation No. 3 of 2021. This article requires certain professions to implement the Know Your Customer (KYC) principles before executing transactions. This process includes collecting identity information, verifying the authenticity of documents, and continuously monitoring transactions. Implementing these principles helps notaries detect unusual transaction patterns or those with suspicious characteristics. KYC principles also serve as the basis for notaries to build client risk profiles, facilitating the transaction analysis process before reporting.

Article 6 of PPATK Regulation No. 3 of 2021 stipulates that suspicious financial transaction reports must contain complete information, including the identities of the parties, the nature and purpose of the transaction, and the reasons for the suspicion. Notaries are required to retain supporting documents for a minimum of five years, as stipulated in Article 9. This retention requirement is crucial for providing evidence and supporting investigations if the transaction is linked to a crime. Accuracy in storing and presenting data will help strengthen the notary's legal standing as a compliant reporting party.

The reporting obligation is also related to Article 8 of the PPATK Regulation No. Law No. 3 of 2021 regulates the reporting deadline. Reports of suspicious transactions must be submitted no later than three business days after the transaction is discovered. This deadline aligns with Article 23 of Law No. 8 of 2010, which means that the Financial Transaction Reports and Analysis Center (PPATK) maintains consistency between the law and implementing regulations. Compliance with this deadline is an important indicator of notaries' compliance with the money laundering prevention system.

The overall legal framework of Law No. 8 of 2010, Law No. 2 of 2014, and PPATK Regulation No. 3 of 2021 demonstrates the synergy between the notary's role as a public official and the obligation to report suspicious transactions. This integrated regulation aims to close legal loopholes that money launderers can exploit in the property sector. A thorough understanding of these articles is crucial for notaries to optimally carry out their role, not only in terms of the legality of deeds but also as agents of financial crime prevention. Full compliance with this framework will strengthen the effectiveness of Indonesia's anti-money laundering system.

Analysis of Obstacles and Reformulation of Reporting Obligations

Internal obstacles faced by notaries often stem from a lack of technical understanding regarding the procedures for reporting suspicious financial transactions to the Financial Transaction Reports and Analysis Center (PPATK). Most notaries focus on the legal function of drafting deeds, while anti-money laundering compliance aspects are considered outside the scope of their daily work. The lack of in-depth knowledge of service user identification standards, report formats, and delivery mechanisms makes it difficult to implement reporting obligations accurately. As a result, the potential for negligence increases, even though these obligations are regulated by law.

Another internal obstacle is the conflict between the obligation to maintain the confidentiality of deeds as stipulated in the Notary Law and the obligation to report suspicious transactions. Notaries are bound by Article 16, paragraph (1), letter f of Law No. 2 of 2014 to maintain the confidentiality of all deeds they draft. This obligation can be perceived as contradictory to the obligation to report to the PPATK, especially when the reported information concerns the personal data and business secrets of the parties. The unclear boundaries of the exceptions to official secrecy have the potential to make notaries hesitate to report.

External obstacles are also evident in the weak coordination between notaries and the Financial Transaction Reports and Analysis Center (PPATK). Not all notary offices have clear communication channels for consultation or verification when suspicious transactions are identified. The lack of a rapid assistance mechanism makes the reporting process ineffective, especially when notaries require confirmation of the criteria for suspicion. It is particularly evident for notaries in areas far from PPATK service centers.

Legal protection for reporting notaries remains inadequate. Although the Money Laundering Law guarantees the confidentiality of the reporter's identity, in practice, concerns about the possibility of legal action from the reported party remain high. This concern is exacerbated by the lack of operational protection instruments in the field, such as direct legal assistance or an automatic defense mechanism when a notary is counter-reported by an aggrieved party.

Reformulation of reporting obligations can be achieved by restructuring the norms in the Money Laundering Law to more explicitly identify the notary profession as the primary reporting party in the property sector. This clarity would eliminate the possibility of interpretation that reporting obligations apply only to financial service providers.

Explicit mention of the notary profession in key articles of the law would provide strong legitimacy for reporting and reduce legal uncertainty.

Simplifying reporting procedures is a strategic step to improve compliance. Overly complex and technical reporting formats often present obstacles for notaries unfamiliar with the PPATK (Financial Transaction Reports and Analysis Center) electronic reporting system. A more user-friendly procedure, complete with a brief guide and integrated with notary office software, will facilitate the implementation of this obligation without disrupting their primary work.

Legal protection for reporting notaries needs to be strengthened with derivative regulations that guarantee the physical, digital, and reputational security of the reporter. Guarantees of identity confidentiality must be accompanied by procedures that ensure that the reporter's data cannot be accessed by unauthorized third parties. Furthermore, a mechanism for enforcing sanctions against parties attempting to intimidate or sue notaries for legitimate reporting is needed.

Optimizing the role of notaries can be achieved by increasing their professional capacity through regular training focused on detecting suspicious transactions in the property sector. This training is not only theoretical but also based on case studies and simulations. A practical approach will help notaries identify unusual transaction patterns without compromising the speed of deed processing.

Digitizing the reporting system will streamline workflows and minimize technical errors. Integrating the notary system with the PPATK reporting portal allows for the automatic transmission of encrypted data. The use of technology can also be complemented by an early warning feature that provides notification when a transaction meets suspicious criteria. This step will improve the speed and accuracy of reporting.

Inter-agency collaboration is key to the successful reformulation of reporting obligations. Collaboration between the PPATK, the Ministry of Law and Human Rights, and notary professional organizations can produce integrated guidelines that apply nationally. These guidelines will regulate reporting procedures, legal protection, and a clear division of roles among all parties. This synergy will ensure that notaries no longer work alone but become part of a national network to prevent money laundering.

CONCLUSION

The role of notaries in preventing money laundering in the property sector has a clear legal basis through Law No. 8 of 2010, Law No. 2 of 2014, and PPATK Regulation No. 3 of 2021. These provisions establish notaries as professional reporting bodies, obligated to identify, verify, and report suspicious property-related transactions. However, the implementation of this obligation still faces obstacles, both internally, such as a lack of technical understanding and conflicts with professional secrecy, and externally, such as weak coordination and legal protection. Analysis indicates that reformulation of reporting obligations is necessary to establish more stringent norms, simplify reporting procedures, and strengthen whistleblower protection. The strategic role of notaries as initial supervisors of the legality of property transactions is a crucial factor in breaking the chain of money laundering in this sector.

The suggestion that can be given is for lawmakers and regulators to adjust the norms in the TPPU Law by explicitly regulating the notary profession as the main reporting party in the property sector, while also providing operational and effective legal protection. Reporting procedures need to be simplified, digitally integrated, and equipped with easy-to-understand guidelines. Notary professional organizations are expected to enhance the capacity of their members through ongoing case study-based training, while

the Financial Transaction Reports and Analysis Center (PPATK) needs to strengthen communication channels and provide technical assistance to notaries across the region. With a combination of regulatory strengthening, technical support, and interagency collaboration, the role of notaries in preventing money laundering in the property sector will be optimized and have a significant impact on national efforts to eradicate financial crime.

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The authors state that there is no conflict of interest in the publication of this article.

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