

The Obligations of Notary as a Party Reporting Suspicious Transactions

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ABSTRACT

The crime of money laundering is currently increasing rapidly along with the times, not only in Indonesia but in the world. As a form of prevention and eradication of money laundering, the Indonesian government issued UUTPPU and inaugurated PPATK to assist in eradicating the crime of money laundering. PPATK involves several professions as reporting parties for suspicious transactions, one of which is a notary. This research aims to find out how the Obligations of a Notary as a Party Reporting Suspicious Financial Transactions and how to submit a suspicious transaction report to PPATK. This research uses a normative judicial method. In practicing the principle of recognizing service users, Notaries have the obligations regulated in PERMENKUMHAM 9/2017 to practice the principle of service users by implementing service users, uploading service users, and monitoring service users related to the purchase and sale of property; management of money, securities, and/or other financial service products; management of checking accounts, savings accounts, savings accounts, and/or securities accounts; operation and management of the company; and/or establishment, purchase and sale of legal entities. Notaries in carrying out their duties, if they find indications of suspicious transactions, must report them to the PPATK through the GOAML application.

Keywords: Notary, Obligations, Suspicious Transactions.

1. INTRODUCTION

The development of the economy in Indonesia is so rapid that it is unavoidable that certain actions in the economic field can be categorized as criminal acts [1]. Various policies have been specifically developed by the government to lay a solid legal foundation and wider space for the development of the business world [2]. Economic crimes usually occur in the banking sector which lead to money laundering. In addition, the form of crime that leads to money laundering is corruption.

Therefore, the government must establish a special law that handles money laundering, because in a state of law, the law has the highest power in a country [3]. The state must obey and obey the law. As a form of step to eradicate money laundering crime in Indonesia, it can be observed that in 2002 the Indonesian government together with the House of Representatives of the Republic of Indonesia ratified Law Number 15 of 2002 concerning the Crime of Money Laundering as amended with Law Number 25 of 2003 concerning Amendments to Law Number 15 of 2002 concerning the Crime of Money Laundering.

However, because a solid legal basis is still needed to ensure the security of law enforcement and the search and return of assets resulting from the crime of money laundering, the Indonesian government feels that it must change the previous Law on Money Laundering with a new one, namely Law Number 8 of 2010 concerning the Prevention

and Eradication of the Crime of Money Laundering (UUTPPU) which is still in effect today.

In addition, the government's seriousness in preventing and eradicating the crime of money laundering is proven by the establishment of an independent institution, the Center for Financial Transaction Reports and Analysis (PPATK) [4]. PPATK also has a role to detect indications of suspicious transactions ending in money laundering by looking at reports made by the Reporting Party and providing recommendations and providing assistance in terms of law enforcement related to money laundering and other acts.

The growing mode used by the perpetrators of the crime of money laundering has made the government even more careful in involving parties that might be exploited by the perpetrators, one of which is a Notary. Based on Article 1 number 11 of UUTPPU the reporting party is anyone who according to this Law is obliged to submit a report to the PPATK. The explanation regarding "any person according to this Law" is contained in Article 17, which includes providers of financial services, providers of other goods and/or services. In addition, there are additional reporting parties as regulated in Government Regulation Number 43 of 2015 concerning Reporting Parties in the Prevention and Eradication of the Crime of Money Laundering (PP 43/2015). The reporting party based on Article 3 PP 43/2015 includes several professions such as advocates, notaries, land deed officials, accountants, public accountants, and financial planners [5].

Consideration of the inclusion of the Notary profession as the reporting party because Notaries are very vulnerable to being exploited by perpetrators of money laundering crimes by using their services to hide the origin of assets and disguise their assets obtained from the proceeds of criminal or illegal acts, because Notaries have an obligation to keep everything related to the secret. his client. Money laundering methods that have recently been frequently used by perpetrators are by buying real estate/house properties by utilizing the means of a Notary.

Notaries are used by perpetrators of money laundering crimes as gatekeepers. Notaries are considered capable of estimating based on the data or information they have or based on general practice, they can judge that a certain amount of money or assets is the result of a criminal act [6]. Notaries are included as the reporting party because the reporting party is an important party in the prevention and eradication of money laundering, because the reporting party is the one who deals directly with criminals who want to do money laundering [7] Based on Article 1 of Law Number 2 of 2014 concerning Amendments to Law Number 30 of 2004 concerning Notary Positions (UUJN) it is stated that "a Notary official is a public official who has the authority based on law to issue authentic deeds and authority other laws based on other laws". In addition, a Notary can also hold concurrent positions as a land deed maker [8].

Notaries also have obligations as regulated in Article 16 UUJN PP 43/2015 requiring Notaries to report to PPAJK [9] so that Notaries have an additional obligation to report if there are indications of suspicious transactions that lead to money laundering.

This research will discuss the obligations of a Notary as a party reporting suspicious transactions. The question of this research is: what is the obligation of a Notary as a party reporting suspicious transactions? What is the procedure for reporting suspicious transactions carried out by a Notary as the reporting party to PPAJK?

2. METHOD

The research method used by the author is normative juridical. This research is a research conducted based on the main legal material by approaching the laws and regulations related to the title and problems of this research, the data used in this research is secondary data obtained through literature study. With primary legal materials in the form of legislation and secondary legal materials in the form of books, scientific journals related to the problems in this research.

3. DISCUSSION

3.1. *Obligations of a Notary as a Reporting Party of Suspicious Transactions*

The reason for the inclusion of a Notary as the Reporting Party is also a recommendation from the Financial Action Task Force (hereinafter referred to as FATF) which publishes international standard measures related to the prevention and eradication of money laundering as a measure and basis for each country to eradicate and prevent money laundering crimes known as designation Revised 40 recommendations and 9 special recommendations (hereinafter referred to as FATF Revised 40+9). In FATF Revised 40+9 Number 16 letter c which says as follows "Lawyers, notaries, other independent legal professionals and accountants – when, on behalf of or for a client, they engage in a financial transaction in relation to the following activities : (a) buying and selling of real estate; (b) managing of client money, securities or other assets; (c) management of bank, savings or securities accounts (d) Organisations of contributions for the creation, operation or management of companies; (e) Creation, operation or management of legal persons or arrangements, and buying and selling of business entities.

From the statement issued by FATF Revised 40+9 Number 16 letter c, it can be concluded that lawyers, notaries and other independent legal professions, when representing on behalf of and on behalf of clients, are involved in financial transactions related to activities, purchases and sales of property, manage client's money, securities or other assets, manage banking accounts, savings or securities, organize related contributions to the creation, operation or management of companies and carry out the creation, operation, management of people or legal regulations as well as buying and selling business entities. With reference to the FATF Revised 40+9, finally a Notary and several other professions such as advocates, public accountants and others were included as Reporting Parties in the PP of the ML Reporting Party.

Notary are required to report to PPAJK if they find indications of suspicious transactions which the PPAJK will then investigate further against the perpetrator up to his family and business relations. Transactions that fall into the category of suspicious transactions under UUTPPU are transactions in the form of; (a) Financial transactions that deviate from the profile, characteristics, or habits of the transaction pattern of the service user concerned; (b) Financial transactions by service users that are reasonably suspected to have been carried out with the aim of circumventing the reporting of the relevant transactions that must be carried out by the reporting party in accordance with the provisions of the laws and regulations governing the prevention and eradication of money laundering; (c) Financial transactions involving carried out or canceled by using assets suspected of originating from the proceeds of criminal acts; (d) Financial transactions requested by the PPAJK to be reported by the reporting party because it involves assets suspected of originating from the proceeds

of a criminal act. Reports of suspicious transactions carried out by Notaries are only limited to orders from UUTPPU through PP 43/2015 [10].

As a public official, a Notary has an authority that other officials do not have. One of the powers of a Notary is to make an authentic deed in the case of a person's legal actions, an authentic deed is deliberately made to serve as written evidence in the future. An authentic deed must be in accordance with the events that occurred, the client will provide the completeness of the files and information to the Notary, of the two things the Notary will later pour into the authentic deed. A deed has the power of authentic evidence[11].

In society, the Notary also has other powers granted from other laws and regulations. When a Notary has the power to make a deed as evidence, the Notary is also required to apply principles to assist customers in using their services, one of which is the principle of prudence in transactions. In carrying out their duties, the Notary is obliged to maintain the confidentiality of the documents he makes and the information obtained in the making of a Notary, unless otherwise provided by law, but on the other hand there are regulations that require Notaries to report to PPATK if there are indications of suspicious transactions.

The entry of the professions in this case is the Notary as the Reporting Party to prevent and eradicate the crime of money laundering in the form of suspicious transactions makes the profession has an obligation to report if there are indications of suspicious transactions to PPATK. To report any indications of dubious transactions to PPATK, the Notary as the reporting party has an obligation to apply the principle of recognizing service users, the application of the principle of recognizing service users is expected to be able to facilitate the Notary as the reporting party of suspicious transactions in detecting indications of suspicious transactions that will be carried out by service users. or clients who use their services.

Recognizing service users is one of the most important principles for Notaries so that the regulation regarding the Notary's authorities in their obligation to implement the principle of recognizing service users is formulated more specifically in the Regulation of the Minister of Law and Human Rights of the Republic of Indonesia Number 9 of 2017 concerning Application of the Principle of Recognizing Service Users for Notary PERMENKUMHAMRI 9/2017). in PERMENKUMHAMRI 9/2017 article 2 paragraph (1) states that "Notaries are required to apply the principle of recognizing service users, followed by paragraph (2), namely the principle of recognizing service users as referred to in paragraph (1) at least containing; identification of service users, verification of service users and monitoring of service user transactions.

Notary in carrying out the identification of service users begins with a request for information and documents to service users, the Notary carries out identification and classification of the service users as individuals or companies. Then the Notary must also ensure that the service user who is facing carries out transactions for himself or for and on behalf of other parties. After obtaining

the identity of the service user, the Notary shall verify the identity of the service user and its supporting documents to convince the Notary of the truth and validity of the identity of the service user.

Identification of service users, Notaries in applying the principle of recognizing service users have the authority to identify service users by means of collecting information on service users consisting of individuals, corporations, and other engagements including, full name, identity number of service users, place of birth date, address, occupation, source of funds and other information required by the Notary. Notaries must also know that service users who carry out transactions with them are acting for themselves or for and on behalf of others.

Each Reporting Party conducting transactions with its clients must request the client in the form of identity and information information as required by the Reporting Party consisting of the client's identity, the source of the funds used for the transaction, the purpose of the client conducting the transaction by filling out a questionnaire equipped with other documents.

After identifying the service user, the Notary will then verify the service user. In verifying service users, the Notary is required to verify every information and document he/she obtains. Notaries in this process can request and obtain information from each service user in terms of interest in knowing the formal truth of the documents and data obtained, if there is doubt from the Notary regarding the correctness of the documents obtained and the Notary is also allowed to request other supporting documents required from the Notary Public. authorized party.

Notaries if there are doubts about the identity data and documents of their service users can ask questions to their service users to be more convincing about the truth and validity of the identities and documents provided by their service users acting for and on behalf of themselves, as well as service users representing other parties to appear before and conduct transactions with a Notary, the Notary can confirm to the party represented by the appearer.

After identification of service users and verification of service users, the Notary then monitors service user transactions. In applying the principle of recognizing service users, Notaries can also monitor the fairness of service user transactions. Notaries also have responsibility for the recording of transactions and information systems that are carried out electronically and non-electronically which can be adjusted to the wishes and characteristics of the Notary. Every transaction carried out by service users is possible to be traced by a Notary through an information system if necessary, for internal purposes and/or the ministry that carries out government affairs in the field of law and law enforcement.

The principle of recognizing service users must also be carried out because in the crime of money laundering, especially in the case of suspicious transactions. There are types of perpetrators of money laundering crimes including: (1) perpetrators who commit predicate crimes themselves in a process of money laundering crimes, (2) crimes that are actually not involved in the predicate crime, but are involved in assisting and committing money laundering, (3)

the perpetrator who did not commit a crime at all, but in practice the perpetrator received the proceeds of the crime and the perpetrator knew that the proceeds he received were the result of a crime [12].

In applying the principle of service users, the Notary must also pay attention to the precautionary principle to its service users, if the Notary finds a suspicion and there is an indication of a suspicious transaction, the Notary has the authority to request supporting and complementary documents as stated in the previous provisions. If at the time the document is requested, the service user refuses to provide additional documents, the Notary is obliged to cut off the relationship with the service user in accordance with the provisions of Article 24 PERMENKUMHAMRI 9/2017 which states that the Notary is obliged to terminate the business relationship with the service user if: the service user does not wish to: to comply with the principle of recognizing service users in this case the service users do not want to provide data or information requested by the Notary, and also because of doubts from the Notary himself over the truth of the information submitted by the service user. Notaries are also obliged to refuse to enter into business relationships and not to carry out transactions with prospective service users if at the time of meeting the Notary they determine things such as, it is known or suspected that the service user uses false data and documents and submits dubious information.

Notaries are also required to refuse, cancel and cut off business relations with service users when they have made transactions if service users use funds for transactions suspected of stemming from the proceeds of criminal acts, Notaries are also required to do documentation, report suspicious transactions, include clauses in the deed regarding provisions for refuse and cancel transactions and cut off relations with service users who are notified in writing. Notaries can also use the results of the application of the principle of recognizing service users which has been carried out by a third party in accordance with the provisions of Article 25 PERMENKUMHAMRI 9/2017, which has policies and procedures for the principle of recognizing service users and is supervised and subject to the competent authority in accordance with the provisions of the legislation. but the responsibility for the principle of identifying service users remains with the Notary who uses the results of the application of the principle of identifying service users from third parties. Notaries who use the principle are required to meet the following criteria: (1) Notaries are required to immediately obtain the necessary information related to the principle procedure of identifying service users; (2) Notaries are required to take appropriate steps to ensure that third parties are willing to fulfill requests for information and copies of supporting documents immediately if required by a Notary; (3) Notaries are required to have cooperation with third parties in the form of a written agreement; and (4) Notaries are obligated to ensure that third parties are not domiciled in high-risk countries. Service users who have a high risk include: (1) in the principle of recognizing service users there is a category of high-risk parties, namely people who have political popularity who are trusted and generally known in a country

including (a) heads of state (b) deputy heads state (c) ministerial-level officials. (2) Employees of government agencies dealing with public services, (3) persons residing in and/or with funds from countries identified by reliable sources as having inadequate anti-money laundering standards or representing crime and corruption high level, (4) people who are involved in the types of activities or sectors of activity that are vulnerable to money laundering. (5) persons named in United Nations lists or other lists published by international organizations as terrorists, terrorist organizations that commit crimes or raise funds for terrorist activities.

Notaries as the reporter in article 3 PP 43/2015, in accordance with article 8 of the Government regulation, notary is obliged to submit a report if there is suspicious financial transaction to the financial transaction reporting and Analysis Center (PPATK). And that is meant by suspicious financial transactions set out in article 1 numeral 5 UUTPPU and article 1 numeral 8 PP 43/2015 [13]. In connection with the stipulation of a Notary as one of the Reporting Parties based on the provisions mentioned in Article 3 PP 43/2015. If the Notary, in carrying out his duties, finds indications of suspicious transactions by service users, the Notary is obliged to report transactions indicating suspicious transactions to PPATK.

o be more effective and the prevention and eradication of money laundering crimes, especially suspicious transactions, the government has a high determination to overcome this, as evidenced by the many regulations issued by the government to close the gaps for perpetrators of money laundering crimes to launch their actions PPATK has a role to carry out examination of financial transactions that give rise to allegations of money laundering or other criminal acts which then forward the results of the examination to investigators for investigation. PPATK only performs the final assessment of the entire process, starting from the identification, analysis, evaluation of suspicious transactions independently, objectively and professionally.

The criteria that must be reported by Notaries for purposes and/or on behalf of service users are different from the criteria that must be reported by financial service providers, for professions it is obligatory to report any indications of suspicious transactions based on the provisions of Article 8 PP 43/2015 in related matters: (a) purchase and sale of property, (b) management of money, securities, and/or other financial service products, (c) management of checking accounts, savings accounts, deposit accounts and/or securities accounts, (d) Operation and management of companies; and/or (e) Establishment, purchase and sale of legal entities. The Notary's responsibility in terms of his obligation to report suspicious transactions is only limited to representing his client based on the information provided by his client. Reports made by a Notary on suspicion of suspicious transactions carried out by his clients do not mean that there is a money laundering crime against the deed, because the PPATK has the power to conclude whether the suspicious transaction is a transaction that leads to money laundering or not after being analyzed by PPATK.

3.2. Procedure for reporting suspicious transactions to PPATK

Notaries in carrying out their duties and work find and are convinced that there are suspicions of dubious transactions that will be carried out by service users and have previously applied the principle of recognizing service users to their appearers or clients, the Notary can report the suspicious transaction with an application called GOAML as a substitute. from the previous application, namely the GRIPS application issued by PPATK. The new GOAML application was launched in 2021 and is regulated in the Regulation of the Head of the Financial Transaction Reports and Analysis Center Number 3 of 2021 concerning Procedures for Submission of Suspicious Financial Transaction Reports for the Profession (PERKAPPATK 3/2021).

The Notary as the Reporting Party must register first before reporting and then fill out the reporting form in accordance with the provisions stipulated in PERKAPPATK 3/2021, including (a) registration; (b) filling in the report. Registration. Registration is carried out for professions that have never registered through the GRIPS application and the profession is obliged to re-register if there is a change in the name of the profession. Registration carried out by a Notary includes organizational registration and registration of administrator officers and registration of the Reporting Party. Administrator officers are officials or employees who are appointed by the profession to register professional organizations, administrator officers, and reporting officers, while reporting officers are officials or employees appointed by the profession to report and be responsible for the truth and completeness of the contents of the report and the timeliness of submitting reports to PPATK . For a Notary profession that has changed its professional name, it is required to attach an application form for a change of professional name which is signed by an authorized professional official and contains the reasons for changing the name of the profession.

For professions that have previously applied for registration, namely GRIPS to the PPATK and there is no change in the name of the profession, they can update the data after receiving the organizational identity number given by the PPATK. Organizational data can be viewed and provided by PPATK in the GOAML application along with the data of administrator officers for the profession, which is then carried out by updating the data and updating administrative officers, including registering reporting officers by profession on the GOAML application. Registration is done through the GOAML application and professions are required to open the GOAML application website at the website address <https://goaml.ppatk.go.id/Home>.

There are 4 steps in the GOAML application website, namely filling in the identity of the Reporting Party, filling in the identity of the administrator, filling in supporting data and then reviewing the feasibility of the data to be sent and forwarded to PPATK. The registration contains organizational data including the name of the organization,

form of organization, city/regency where the organization is located, province, country, e-mail address, domicile address of the organization and officer data. PPATK will verify the registration application with the results in the form of an e-mail (electronic letter) containing the registration approval and organizational identity number or the rejection of the registration application.

After registering and receiving further verification, the notary can fill out reports regarding suspicious transactions; and also suspicious activity due to not continuing the procedure for recognizing the principle of service users and terminating business relationships with service users. Filling in dubious transaction reports is carried out by filling out (entry) reports contained in the GOAML application and can also be done by uploading reports to the GOAML application. GOAML application in XML format. Reports of suspicious transactions must be submitted by a Notary as soon as possible no later than 3 (three) working days after the Notary discovers and discovers that there are elements of dubious serious transactions.

If in the process of filling out a suspicious transaction report there is a communication facility to submit a report that is not yet available in the area where the Notary is domiciled or the facility is experiencing technical problems, a force majeure situation is occurring or actually causes the Notary to be unable to submit a report electronically and there is damage and/or If there is a disturbance in the PPATK system, the Notary can report non-electronically sent via delivery or expedition services directly to the PPATK office in the form of data recordings in XML format that are stored in compact disks, flash disks or other electronic storage facilities and the Notary is obliged to make notifications through the application. GOAML on the message board menu to PPATK that sending reports via non-electronic.

Steps in reporting in the context of indications of suspicious transactions in preventing and eradicating the crime of money laundering, if simplification is carried out, the steps are as follows: (1) Notaries request data from clients as a condition for making a deed of sufficient value or if above hundreds of millions of rupiah . (2) The Notary obtains the data, the Notary conducts a more focused and directed search to find out where the source of the money used for the transaction is, (3) The Notary asks the client to make a statement about where the source of the funds came from. (4) 4) Notaries only have limited liability for the information provided by the client.

4. CONCLUSION

The Notary Profession is included as a Reporting Party because it is considered a gatekeeper to guard and prevent dubious transactions that lead to money laundering. Noataris are expected to assist the state in combating money laundering. In addition, it is also expected to make it easier for law enforcers to take legal steps to take action against perpetrators of money laundering crimes. With the addition of several professions as Reporting Parties, it is also intended to assist PPATK in carrying out their duties in

preparing reporting facilities that are effective and easy to understand by the Reporting Parties in accordance with their respective fields. The obligation of a Notary to report suspicious transactions is to identify its service users, although there is still much debate due to a conflict between UUJN and the PP 43/2015, on the one hand UUJN requires Notaries to keep all information about its service users confidential, but on the other hand the PP 43/2015 includes a Notary as one Reporting Party which will automatically disclose matters relating to its service users. Notary are required to practice the principle of recognizing service users in every transaction with service users. Notaries as reporting parties have the authority and must practice the principle of service users based on the provisions of Article 18 UUTPPU. The Notary becomes one of the Reporting Parties for suspicious transactions based on the provisions in Article 3 of the PP 43/2015 which is the Implementing Regulation of the UUTPPU. Notaries are required to apply the principle of identifying service users by carrying out identification of service users, verification of service users, and monitoring of service user transactions related to the purchase and sale of property; management of money, securities, and/or other financial service products; management of checking accounts, savings accounts, time deposit accounts, and/or securities accounts; operation and management of the company; and/or establishment, purchase and sale of legal entities.

Notaries in carrying out their duties if they find indications of suspicious transactions are required to report them to the PPATK through the GOAML application, with the reporting stages, namely, registration and filling out reports. delivery or expedition services directly to the PPATK office in the form of data recordings in XML format that are stored on CDs, flash disks or other electronic storage facilities and the Notary is obliged to make a notification through the GOAML application on the message board menu to the PPATK that the report is sent via non-electronic to the PPATK.

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