

The Notary's Influential Position in Preventing Money Laundering

Depi Prapita Sari ^{1)*}, Yoyo Arifardhani ²⁾

^{1,2)} Prodi Magister Kenotariatan, Fakultas Hukum, Universitas Pancasila, Indonesia

*Corresponding Author

Email: depiprapitasari367@gmail.com, arifardhaniyoyo@gmail.com

Abstract

Notaries are not infrequently involved in a legal priat. The condition of the notary profession is semi-public and open, notaries are allowed to voice any opinion, including those chosen and leave at any time. The regulations governing notaries show that notaries are a vital and crucial profession. Notary responsibilities are not limited to the professionalism of the notary but also include to provide and participate in supervising fellow notaries. Fraudulent transactions are often missed because they are too vague, this is a problem often faced by notaries. Referring to statistical reports by PPATK, at least more than 100 notaries were involved in TPPU including acte of grant, acte of sale and purchase, acte of business establishment which turned out to be sourced from gambling and drug crimes throughout 2020. Based on PPATK number of Fraudulent financial transaction reports increased significantly in recent years. In this study, the method used by the researcher is a normative study that focuses on legal objectives, principles of justice, legal validity, legal concepts, and legal standards. In addition, this normative legal study aims to answer the issues to be examined by applying legal principles and theories. This study is expected to provide arguments and concepts that can be applied to similar legal issues. Notaries authority to report Fraudulent financial transactions (LTKM) has been clearly regulated in laws and regulations, including Act Number 8 Year 2010 on the Prevention and Eradication of Money Laundering, Government Regulation Number 43 Year 2015 on reporting parties in the Prevention and Eradication of Money Laundering, and Permenkumham number 9 of 2017 on the implementation of the principle of recognizing service users for notaries, and is mentioned again in. Notaries are among those who are required to report Fraudulent transactions to PPATK. However, in fact, these requirements frequently conflict with the idea of secrecy of office as provided in the Notary Office Act.

Keywords: Notary, Criminal Offense, Money Laundering.

INTRODUCTION

Notaries are not infrequently involved in a legal priat. The condition of the notary profession is semi-public and open, notaries are allowed to voice any opinion, including those chosen and leave at any time. The regulations governing notaries show that notaries are a vital and crucial profession. Notary responsibilities are not limited to the professionalism of the notary but also include to provide and participate in supervising fellow notaries. (Abintoro Prakoso, 2015)

The professionalism of Notaries is clearly regulated in Act Number 2 Year 2014 about amendments to Act Number 30 Year 2004 About Notaries (hereinafter referred to as UUJN), the position of Notaries is described in Section 16 Verse 1 letter F “in carrying out his position notaries have an obligation to keep secret everything related to actes made by notaries and all information explained to notaries, unless otherwise stipulated in the law” to the contrary, this Section is like a double-edged knife, because it has the potential to become a safe haven for money-laundering offender (hereinafter referred to as TPPU) to launder their proceeds of crime.

Money laundering is a complex and organized crime that not only harms the country's economy but also disrupts the stability of the global financial system. This crime often involves perpetrators who have access to power and extensive criminal networks, making law enforcement a challenge in itself. On a global scale, money laundering often serves as a tool to support other serious crimes such as corruption, drug trafficking, terrorism financing, and transnational crimes. Therefore, efforts to prevent and eradicate money laundering have become a major concern for many countries, including Indonesia.

A Notary Public, in carrying out their duties and responsibilities, is not only required to comply with applicable laws, but must also be able to consider moral values, ethics, and norms that apply in society. As a public official, a Notary acts as a representative of the State in providing civil law services to the public. This can be seen from the creation of authentic deeds and legal products, where Notaries play a role in creating legal certainty and protection for the public.

Tppu perpetrators often use notaries to launder their TPPU results with various legitimate transactions. Therefore, UUJN Section 16 Verse 1 is set aside by Section 17 Verse 2 of the TPPU law which explains that notaries have an obligation to have personal information and transactions carried out by Notary clients. Then in Government Regulation Number 43 Year 2015 Section 3 jo. Government Regulation Number 61 Year 2021 Section 8 Verse 1 concerning amendments to Government Regulation Number 43 Year 2015 explains that notaries must carry out their duties as reporters in actions suspected of being TPPU carried out by clients without hindrance.

As referred to in Section 2 of Government Regulation No. 43 of 2015 concerning whistleblowers in the Prevention and Eradication of money laundering, which are included in the whistleblowers about the existence of TPPU, among others: a. The lawyer; b. Notary; c. Department of the interior; d. The accountant; e. Public accountant; and f. Planning; and g. Planner. Notaries have an obligation to keep personal information confidential and other things that are not contained in the acte, including from other parties who do not have an interest, but notaries in Section 2 of Government Regulation Number 43 of 2015 concerning whistleblowers in the Prevention and Eradication of money laundering are required to provide reports on transactions that are considered Fraudulent. Even so, the notary's obligation to maintain client confidentiality often clashes with the notary's obligation as a reporter and informant against the TPPU. This obligation to keep secrets is what TPPU perpetrators often use to launder their money to become legal. (Muhammad Bintang Naufald, et.all, 2023)

Fraudulent transactions are often missed because they are too vague, this is a problem often faced by notaries. Referring to statistical reports by PPATK, at least more than 100 notaries were involved in TPPU including acte of grant, acte of sale and purchase, acte of business establishment which turned out to be sourced from gambling and drug crimes throughout 2020. Based on PPATK number of Fraudulent financial transaction reports increased significantly in recent years. (Kartika Kismawardani, et.all, 2023)

However, the Notary's obligation to report suspicious financial transactions can be considered a new challenge. On the one hand, Notaries have a legal obligation to support the Anti-Money Laundering program by reporting suspicious activities to the Financial Transaction Reports and Analysis Center (PPATK). Notaries carry out their duties and obligations under the supervision of the Notary Supervisory Board to ensure compliance with applicable laws and regulations. The role of the Notary Supervisory Board is to supervise Notaries so that in carrying out their duties they do not deviate from their authority and do not violate applicable laws and regulations. In addition, it also supervises, examines, and imposes sanctions on Notaries. while the function of the Notary Supervisory Board is to ensure that all rights, authorities, and obligations granted to Notaries in carrying out their duties as stipulated by applicable laws and regulations are always exercised within the prescribed boundaries, not only legally but also morally and ethically, in order to guarantee legal protection and certainty for those who need it.

Notaries are expected to carry out their duties by upholding the principles of independence and neutrality. Notaries have a legal and moral responsibility not to engage in practices that could harm the country's legal and economic systems, including money laundering. Therefore, applicable laws require notaries to play an active role in detecting and reporting suspicious transactions in order to maintain the integrity of the national financial system.

Preventive efforts against TPPU are considered difficult, as a clear effort by the government then passed Act Number 8 of 2010 on the Prevention and Eradication of money

laundering. (Dwi Asri Puanandini, 2024) Notaries are required to uphold norms, independence and neutrality in carrying out their duties and authorities. Legally and ethically, notaries are obliged to prevent behavior that is considered to be harmful to the law and economy. The notary must also aggressively identify and report any Fraudulent transactions. Even so, there are several things that prevent Notaries from revealing transactions that are considered Fraudulent, one of which is the relationship of professionalism with clients. As an effort to maintain the dignity of Notaries, notaries in exercising their authority are supervised by the Supervisory Board, including in the case of TPPU. Even so, notaries who violate the code of ethics and receive punitive sanctions are considered ineffective due to loose supervision and pressure from other parties.

However, in practice, various challenges arise that hinder the independence of notaries in reporting suspicious financial transactions. Many notaries face a dilemma between fulfilling their obligations as reporters and maintaining professional relationships with their clients. In addition, there are obstacles in the implementation of supervision by the Supervisory Board of notaries suspected of being involved in money laundering. Several cases show that sanctions against notaries who violate the rules have not been fully effective, either due to a lack of strict supervision or other factors such as pressure from certain parties.

Based on these conditions, a comprehensive legal analysis is needed regarding the independence of notaries in reporting suspicious financial transactions and the authority of the Supervisory Board in taking action against notaries who are involved. Thus, this study aims to explore the extent to which notaries' independence can be maintained in carrying out these legal obligations and the effectiveness of supervision and sanctions imposed on notaries who violate relevant legal provisions.

RESEARCH METHODS

In this study, the method used by the researcher is a normative study that focuses on legal objectives, principles of justice, legal validity, legal concepts, and legal standards. In addition, this normative legal study aims to answer the issues to be examined by applying legal principles and theories. This study is expected to provide arguments and concepts that can be applied to similar legal issues. (Peter M. Marzuki, 2023)

The method of approach used in this study is a qualitative approach by using the method through the study of literature. Thus, what is done by the author is to conduct research related to the duties and authority of Notaries based on Act Number 2 Year 2014 about amendments to Act Number 30 Year 2004 about Notary and Act Number 8 Year 2010 about the Prevention and Eradication of money laundering. This is done by conducting data research in the form of library materials or secondary data by searching for regulations and literature related to the issue being studied.

RESULT AND DISCUSSION

Act Number 8 Year 2010 about Prevention and Eradication of money laundering (hereinafter referred to as the UU TPPU) Notaries have an obligation to prevent and balance TPPU, because notaries and other officials are considered obliged to report financial transactions that are considered Fraudulent. In addition to the UU TPPU, these obligations are also explained in Government Regulation Number 43 Year 2015 and PPATK Regulation Number 3 Year 2021. In addition to what is required in laws and regulations, notaries are required to keep anything secret including the acte that the notary made. The existence of a conflict between these 2 (two)

obligations poses a risk to the professionalism of the notary in carrying out the notary function and also as a reporter who prevents the occurrence of TPPU. However, the UUJN explains the principle of prudence in carrying out the duties and authority of Notaries. Section 4 Verse 2 regulates the notary's Oath and promise, the notary swears to carry out his responsibilities honestly, accurately, independently and does not involve other parties. Then in Section 16 Verse 1 letter a obliges the notary to defend the interests of all parties involved in the judicial process. (Ghansham Anand, et.all, 2024)

The TPPU Act that has been passed by the government expands the law to eradicate TPPU. One of the efforts is contained in the TPPU law by detecting and reporting Fraudulent transactions by parties using financial and non-financial services. The parties who use financial and Non-financial services are considered to be often involved in transactions that are often used to launder money, for example buying and selling property, establishing companies and transferring property through notaries. Notaries who are officials who have the authority to make authentic actes have a strategic role. PPATK explained that the reference for notaries in exercising their authority in preventing and reporting TPPU is Government Regulation Number 43 Year 2015 about reporting organizations in the Prevention and Eradication of money laundering (hereinafter referred to as PP TPPU) which waives the obligation of notaries in the UUJN about keeping client information confidential. (Aganita Dhaneswara, 2020)

When referring to Section 1 Number 3 of PP TPPU, it is mandatory for reporters to be responsible to PPATK,. Section 2 Verse 2 and Section 3 provide additional facilities for anyone who falls into the category of reporters in PP TPPU, among others: 1. Section 2 Verse (2) - reporting of financial service providers other than as referred to in Verse (1) letter (A) also includes: a) venture capital companies; b) Infrastructure Finance Companies; c) Microfinance Institutions; and d) Export Finance Institutions. 2. Section 3. whistleblowers other than those referred to in Section 2 also include: a) advocates; b) notaries; c) land acte Officer; d) accountant; e) Public Accountant; and f) Financial Planner.

Because this is mutually sustainable with the position as stipulated in Pasla 16 Verse 1 letter f UUJN, therefore it results in normative and ethical concerns. Because notaries are considered to have a crucial role in disclosing legal transactions. Therefore, this authority should be mandated to the notary because it is considered to have a position in a crucial axis, especially in identifying and preventing TPPU. As a public service of the law, the Notary is often the first reference recommended by the police to collect evidence of criminal acts. Therefore, notaries in addition to exercising their authority in administrative and legal matters, notaries also have great authority in the form of preventive efforts to identify Fraudulent characters from their clients. As stipulated in the regulation of the Minister of Law and Human Rights number 9 of 2017, as a means to carry out this obligation, in addition to making authentic actes, notaries also need to apply the principle of prudence and follow the principle of recognizing clients who use notary services.

Money launderers take advantage of legal loopholes, including using notaries to do Money Laundry so that illegal money becomes legal. This has resulted in the position of Notaries being very vital as a spearhead in law and finance so that notaries must have proactive steps to make preventive efforts against the occurrence of TPPU that utilize notaries. In an effort to implement reporting tasks by notaries including procedural collection of service user identification data, verification of documents and conducting protocols on data within a predetermined period of time. Then if the notary does find a discrepancy between the client's profile and the type of transaction completed, Notary has an authority to report fraudulent transactions and submit through the Go-Amil application managed by PPATK. The notary is also given the burden to terminate the work if it is identified that there is a blockage in the verification procedure or related to a prohibited purpose.

The law clearly and explicitly explains these obligations, but there are still many notaries who have difficulty in carrying out these reporting obligations. This shows that there are still few reports given to PPATK, gaps that are based on many factors, such as lack of awareness of notaries of these obligations, notary concerns about confidentiality protocol customers and lack of protection given to notaries when they report TPPU. However, it needs to be underlined, notaries are legally protected when carrying out their duties and authorities, as stipulated in PP TPPU Section 45 stipulates that a reporter will not be charged with a criminal and/or civil offense as long as the report has been assessed in accordance with the procedure and is based on good faith. Then the approval process of the notary Honorary Council (MKN) needs to protect the notary by requesting that the notary's identity not be revealed by investigators, although legal protection still does not provide a sense of security for notaries, especially when notaries get clients who have prominent political or economic influence.

Therefore, the obligation of notaries to report Fraudulent financial transactions is very strong, both in the legislation that governs them. However, the fact is that such requirements continue to encounter obstacles both within the notary profession and outside the supervisory system. Therefore, improved regulations and regular training are essential for notaries to understand their legal obligations and be able to play a preventive role in the anti-money laundering system. Notaries caught following TPPU can be fined in two ways: 1. Administrative and ethical sanctions by the Supervisory Board based on the notary position law (UUJN) and regulation of the Minister of Law and Human Rights : a. Verbal / written reprimand, if the violation is still minor or has not been proven legally but there are strong indications. b. Temporary dismissal, a heavier sanction for notaries proven not to have performed legal obligations, such as not reporting Fraudulent transactions. c. Dishonorable discharge submitted by the Central Supervisory Board to the Minister of Law and human rights if the notary is found to have committed gross violations including money laundering. 2. Criminal sanctions in accordance with Law No. 8 of 2010 on the Prevention and Eradication of TPPU: a. Notaries who intentionally assist or facilitate money laundering may be subject to criminal sanctions in the form of imprisonment and fines, as provided for in the criminal Section of the TPPU law. b. In addition, a acte drawn up by a notary as part of a money laundering practice may be declared invalid or only have force as a acte under hand, in accordance with the provisions of the UUJN and civil law.

Permenkumham Number 9 Year 2017 which regulates the application of the concept of recognizing consumers of notary services, requires notaries to report Fraudulent transactions to PPATK. Although the notary is not involved in the TPPU, its findings are subject to change, and if this report is duly completed, the notary will be protected from litigation. If the notary is not aware of the tppu component in the transaction, it will be given legal protection because it has checked and documented the name and document in accordance with the concept of service user recognition. To provide extra protection under Section 66 UUJN, the notary honorary Assembly must approve the acte before it is analyzed by a notary. (Maria Fransiska Christiani Nawang, 2021)

Legally, the Notary Supervisory Board has the authority to investigate notaries suspected of committing violations, and in practice, such investigations have significant legal consequences. However, the implementation of reporting obligations by notaries still faces various obstacles, including a lack of understanding among notaries of these obligations and ineffective dissemination of information by the PPATK and the Supervisory Council. In addition, the Supervisory Council, particularly the Regional Supervisory Council, is considered to be passive and has not optimally conducted investigations into reports submitted by notaries.

In order to strengthen the Notary's monitoring and compliance system with anti-money laundering regulations, it is recommended that the Regional Supervisory Board actively evaluate and examine incoming reports, as well as improve the quality of supervision and the intensity of

socialization. The main objective is to provide legal protection to Notaries while supporting efforts to prevent money laundering crimes. In this case, the role of the Regional Supervisory Council is not only repressive, but also preventive and educational in order to create clean and legally responsible notarial practices.

CONCLUSION

Notaries authority to report Fraudulent financial transactions (LTKM) has been clearly regulated in laws and regulations, including Act Number 8 Year 2010 on the Prevention and Eradication of Money Laundering, Government Regulation Number 43 Year 2015 on reporting parties in the Prevention and Eradication of Money Laundering, and Permenkumham number 9 of 2017 on the implementation of the principle of recognizing service users for notaries, and is mentioned again in. Notaries are among those who are required to report Fraudulent transactions to PPATK. However, in fact, these requirements frequently conflict with the idea of secrecy of office as provided in the Notary Office Act.

The authority of the notary Supervisory Board includes the functions of supervision, examination, and sanctions against notaries suspected of committing violations, including in the case of Notary involvement in money laundering. The Supervisory Board consists of three levels (regional, regional, and Central), which have their respective authorities as stipulated in the Notary Office Law. However, the effectiveness of the authority still faces challenges, both in terms of implementation, transparency, and legal certainty in the sanctions enforcement process. Notaries have a strategic role in supporting the anti-money laundering regime, but there are still legal loopholes and unclear limits of responsibility that raise doubts in practice. It is necessary to integrate between the principle of independence of notaries and the obligation to report, so that there is no imbalance that harms the national legal system.

REFERENCES

- Adhalia Septia Saputri, Edi Saputra Hasibuan, *Perlindungan Hukum bagi Saksi dalam Kasus Tindak Pidana Pencucian Uang di Indonesia*, Journal of Mandalika Literature, 2024.
- Aganita Dhaneswara, *Keterlibatan Notaris Dalam Pemberantasan Money Laundering Berdasarkan PP No. 43 Tahun 2015 Dikaitkan Dengan Asas Kerahasiaan Terbatas*, Lex Renaissance, 2020.
- Agustinningrum, A., & Irmayanti, A. D., *Kejahatan Pencucian Uang dan Perdagangan Orang : Perspektif Internasional dalam Penegakan Hak Asasi Manusia*, Jurnal Anti Korupsi, 2023.
- Alvina Agustinningrum, Alisa Dwi Irmayanti, *Kejahatan Pencucian Uang dan Perdagangan Orang: Perspektif Internasional dalam Penegakan Hak Asasi Manusia*. *Jurnal Anti Korupsi*, 2023.
- Aryo Fadlian, *Pertanggungjawaban Pidana dalam Suatu Kerangka Teoritis*, Jurnal Hukum POSITUM, 2020
- Asri Puanandini, Dewi. dkk. 2024. *Strategi Pencegahan dan Penanggulangan Tindak Pidana Pencucian Uang Dalam Perspektif Hukum dan Kebijakan Nasional*. Jurnal Sosial Politik. Pemerintahan dan Hukum. Vol. 3. No.3.
- Bintang Naufald, Muhammad dan Laksmana Bonaparta, Gandjar. 2023. *Peran Notaris Sebagai Pihak Pelapor dalam Pencegahan dan Pemberantasan Tindak Pidana Pencucian Uang*. UNNES Law Review. Vol. 6. No. 2.

- Chirstiani Nawang, Maria Fransiska dan Rasmadi Arsha Putra, I Putu. 2023. *Akibat Hukum Pembatalan Salinan Akta Notaris Oleh Pengadilan*. Acta Comitatus Jurnal Hukum Kenotariatan. Program Suti Magister Kenotariatan. Fakultas Hukum. Universitas Udayana. Vol 06 No 03.
- Dewi Asri Puanandini, Halena Taufiqurrahmawati, *Strategi Pencegahan dan Penanggulangan Tindak Pidana Pencucian Uang Dalam Perspektif Hukum dan Kebijakan Nasional*, Jurnal Sosial Politik, Pemerintahan dan Hukum, 2024.
- Dhaneswara, Aganita. *Keterlibatan Notaris Dalam Pemberantasan Money Laundering Berdasarkan PP No. 43 Tahun 2015 Dikaitkan Dengan Asas Kerahasiaan Terbatas*. Lex Renaissance. Vol. 5. No. 1 (2020).
- Ghansham Anand, Sudirman. et.all. 2014. *Penerapan Asas Kehati-hatian Notaris dalam Menjalankan Kewenangannya Berdasarkan UU Jabatan Notaris dan Kode Etik Notaris*. Jurnal Negara Hukum Volume 15 Nomor 2.
- Harahap, M. R., Purba, H., & Suprayitno. (2024). *Perbandingan Penerapan Prinsip Mengenali Pengguna Jasa Kepada Pejabat Pembuat Akta Tanah (PPAT) Dengan Notaris Dalam Perspektif Pencegahan Tindak Pidana Pencucian Uang Dan Pendanaan Terorisme*. Jurnal Intelek Insan Cendikia, FH USU.
- Ida Rahma, *Urgensi Peran Pusat Pelaporan dan Analisis Transaksi Keuangan Dalam Penegakan Hukum Tindak Pidana Pencucian Uang*, Jurnal Hukum Pidana Islam, Perundang-undangan, dan Pranata Sosial, 2022.
- Khadafi, M., *Implementasi Hukum Prinsip Mengenali Pengguna Jasa Dilaksanakan Notaris Terhadap Pelaporan Transaksi Keuangan Mencurigakan Melalui Aplikasi Go-AML Berdasarkan Peraturan PPATK Nomor 3 Tahun 2021*, Jurnal Hukum dan HAM Wara Sains, 2023.
- Kismawardani, Kartika dan Lusiaty Cahyarini, Luluk. 2023. *Relevansi Notaris Sebagai Pihak Pelapor Dalam Upaya Pencegahan Tindak Pidana Pencucian Uang*. Notarius. Vol. 16. No. 3.
- M. Marzuki, Peter. 2023. *Metode Penelitian Hukum*. Jakarta: Sinar Grafika
- M. Rizki Harahap, Hasim Purba, Suprayitno, *Perbandingan Penerapan Prinsip Mengenali Pengguna Jasa Kepada Pejabat Pembuat Akta Tanah (PPAT) Dengan Notaris Dalam Perspektif Pencegahan Tindak Pidana Pencucian Uang Dan Pendanaan Terorisme*, Jurnal Intelek Insan Cendikia, FH USU, 2024.
- Muammar Khadafi, *Implementasi Hukum Prinsip Mengenali Pengguna Jasa Dilaksanakan Notaris Terhadap Pelaporan Transaksi Keuangan Mencurigakan Melalui Aplikasi Go-AML Berdasarkan Peraturan PPATK Nomor 3 Tahun 2021*, Jurnal Hukum dan HAM Wara Sains, 2023.
- Muhammad Bintang Naufaldy, Gandjar Laksmana Bonaparta, *Peran Notaris Sebagai Pihak Pelapor dalam Pencegahan dan Pemberantasan Tindak Pidana Pencucian Uang*. UNNES Law Review, 2023.
- Musdiyanti, W, *Etika dan Pertanggungjawaban Moral Profesi Notaris (Kajian Undang-Undang No. 2 Tahun 2014 dan Kode Etik Notaris Tahun 2015)*, Jurnal Hukum Kenotariatan, 2022.
- Naufaldy, M. B., & Bonaparta, G. L, *Peran Notaris Sebagai Pihak Pelapor dalam Pencegahan dan Pemberantasan Tindak Pidana Pencucian Uang*, UNNES Law Review, 2023.
- Prakoso, Abintoro. 2015. *Etika Profesi Hukum Telaah Historis. Filosofis dan Teoritis Kode Etik Notaris, Advokat, Polisi, Jaksa dan Notaris*. Surabaya : Laksbang Justitia Indonesia.
- Rahma, *Urgensi Peran Pusat Pelaporan dan Analisis Transaksi Keuangan Dalam Penegakan Hukum Tindak Pidana Pencucian Uang*, Jurnal Hukum Pidana Islam, Perundang-undangan, dan Pranata Sosial, 2022.
- R. Juli Moertiono, *Perjanjian Kredit Pemilikan Rumah dalam Perspektif Teori Perlindungan Hukum*, Jurnal Penelitian LAS, 2021.

Salim, & Septiana, E., *Penerapan Teori Hukum pada Penelitian Tesis dan Disertasi*. Depok: RajaGrafindo Persada, 2013.

Sunggono, B., *Metodologi Penelitian Hukum*, Jakarta: PT Raja Gravindo Persada, 1998.

Supriadi, *Etika & Tanggung Jawab Profesi Hukum di Indonesia*, Jakarta: Sinar Grafika, 2006.

Suratman, & Dillah, H. P, *Metode Penelitian Hukum*, Bandung: CV. Alfabeta, 2013.

Tobing, G. H. S. L, *Peraturan Jabatan Notaris (Notaris Reglement)*, Jakarta: Erlangga, 1990.

Wiwin Musdiyanti, *Etika dan Pertanggungjawaban Moral Profesi Notaris (Kajian Undang-Undang No. 2 Tahun 2014 dan Kode Etik Notaris Tahun 2015)*, Jurnal Hukum Kenotariatan, 2022.

Wenderlin Koswara, *Implementasi Perlindungan Data Pribadi oleh Penyelenggara Sistem Elektronik dikaitkan dengan Teori Keadilan dan Kepastian Hukum*, Jurnal Paradigma Hukum Pembangunan, 2022.