

Notary Public Responsibility in Reporting Suspected Money Laundering Crimes Under Indonesian Law

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<i>Article Info</i>	<i>Abstract</i>
Dates: Accepted: 3-08-2025 Revised: 8-09-2025 Published: 10-10-2025 Keywords : Notary Responsibilities, Reporting, Money Laundering, Indonesian Law.	Money laundering is a serious crime that threatens the integrity of Indonesia's legal and financial systems. In practice, notaries, as public officials authorized to draw up authentic deeds, are often in a strategic position that can potentially be exploited as a means of money laundering. Therefore, notaries are burdened with the responsibility of reporting suspected money laundering crimes as part of the regime for the prevention and eradication of money laundering crimes. This study aims to analyze the form of notary responsibility in reporting suspected money laundering crimes and their legal implications according to Indonesian law. The research method used is normative juridical with a legislative and conceptual approach. The legal materials used include primary, secondary, and tertiary legal materials that are analyzed qualitatively. The results of the study show that the responsibilities of notaries in reporting suspected money laundering crimes have been regulated in various laws and regulations, but still raise normative issues, particularly regarding the limits of reporting obligations, the principle of professional secrecy, and legal certainty and protection for notaries. Therefore, regulatory clarity and synchronization of regulations are needed to ensure the effective implementation of notaries' responsibilities without neglecting the principles of prudence and legal protection.

1. Introduction

Money laundering is a complex, cross-sector economic crime because it involves the process of disguising or obscuring the origin of assets obtained from criminal acts. To combat this crime, the state, through Law No. 8 of 2010 on the Prevention and Eradication of Money Laundering, regulates the obligation of certain parties, including

notaries, to report suspicious financial transactions to the Financial Transaction Reports and Analysis Center (PPATK). This provision aims to strengthen the state's efforts to maintain the integrity of the national financial system.

The role of notaries in preventing money laundering is explicitly regulated in Article 3 of Government Regulation No. 43 of 2015, which is mandated by Article 17 paragraph (2) of the Money Laundering Law. This regulation gives notaries a new responsibility to ensure that there are no indications of money laundering by service users. Based on Article 4 of Government Regulation No. 43 of 2015 in conjunction with Article 2 of Minister of Law and Human Rights Regulation no. 9 of 2017, Notaries as Reporting Parties are required to implement the PMPJ before reporting to the PPATK. (Eliya Al-Afrida Siska, 2022).

The strength of the norm of "the notary's obligation to keep deeds confidential" compared to the obligation to report suspicious financial transactions gives rise to a conflict of legal norms. This can be resolved using the principles of *lex superiori derogat legi inferiori*, *lex specialis derogat legi generali*, and *lex posteriori derogat legi priori*. Based on an analysis of legal preferences, the obligation to keep deeds confidential as specified in "Article 4 paragraph (2), Article 16 paragraph (1) letter f, and Article 54 paragraph (1) of the UUJN" has legal force that cannot be overridden by Article 3 of the TPPU Reporting PP. Therefore, notaries who do not report suspicious transactions cannot be considered to have violated the law; on the contrary, they would be violating the law if they disclosed confidential information. (Yalid Yalid and Birman Simamora, 2021).

The principle of public order forms the basis for notaries in reporting parties suspected of involvement in money laundering. Although the Notary Law requires notaries to maintain the confidentiality of client data, the Anti-Money Laundering Law requires reporting if there are indications of criminal activity. Thus, notaries are in a position that requires a balance between performing their duties in accordance with the Notary Law and their reporting obligations under the Money Laundering Law. (Nadya Yusvira, Fitra Deni, and Yoga Satrio, 2025).

However, this reporting obligation raises legal issues because it conflicts with the principle of notarial confidentiality as specified in Article 4 paragraph (2) of the Notary Law. This article stipulates that notaries are obliged to keep confidential all matters relating to deeds and information obtained in the performance of their duties. As a result, there is a legal antinomy between the obligation to report TPPU and the obligation to maintain the confidentiality of deeds. On the one hand, notaries are required to support the prevention of criminal acts, but on the other hand, they are bound by the principle of confidentiality as part of professional ethics and legal protection for the parties to the deed.

Notaries, as public officials, play an important role in ensuring legal certainty and protection through the creation of authentic deeds. In carrying out their duties, notaries are required to maintain the confidentiality of the contents of deeds and client data as specified in Article 16 of the Notary Law and reinforced in their oath of office.

Violations of this obligation are subject to ethical and criminal sanctions as specified in Article 322 of the Criminal Code, making the principle of confidentiality the main foundation of public trust in the notary profession.

Along with developments in financial law, the role of notaries has undergone significant changes. The government has appointed notaries as reporting parties based on Article 3 of Government Regulation No. 43 of 2015 in conjunction with the Anti-Money Laundering Law. In this capacity, Notaries are required to identify clients, collect information, and report suspicious transactions to the Financial Transaction Reports and Analysis Center (PPATK). This change reflects a shift in the role of Notaries from authenticating deeds to becoming part of the state's financial transaction monitoring system.

This policy creates a dilemma because of the conflict between two legal obligations, namely maintaining the confidentiality of deeds and reporting suspicious transactions. This conflict poses the risk of criminalization of notaries both when they fulfill and when they neglect their reporting obligations. This shows that there is still a lack of optimal harmonization between regulations that protect client confidentiality and regulations that emphasize the public interest. (Natan Kaharu et al., 2025). Based on the principle of *lex specialis derogat legi generali*, the reporting obligation as specified in the Anti-Money Laundering Law must be prioritized, although its implementation must still take into account the protection of human rights.

As specified in the Anti-Money Laundering Law and Government Regulation No. 43 of 2015, notaries are required to report suspicious transactions to maintain the stability and integrity of the financial system. For this obligation to be effective, technical training, inter-agency synergy, and adequate legal protection guarantees are required. (Shania Khesly, 2025). This situation requires notaries to adapt quickly, including understanding reporting technology and the characteristics of high-risk transactions.

From a professional ethics perspective, the Notary Code of Ethics requires notaries to maintain client confidentiality while still reporting suspected money laundering. Although there is a conflict between these two obligations, notaries must prioritize the interests of the state and society over personal interests. (Muhammad Bintang Naufaldy and Gandjar Laksmana Bonaparta, 2023). The personal integrity of notaries is an important factor in maintaining professionalism amid conflicts of legal norms.

As a public official and holder of a position of trust (*vertrouwensambts*), a notary has the right to maintain the confidentiality of deeds. However, this right does not apply when there are indications of criminal activity. Notaries must prioritize the public interest and support law enforcement efforts. (Dian Ayunita Prasstumi, 2022). Unfortunately, the limitations on the application of this right of refusal are not widely understood by notaries or the public. In some cases, notaries who set aside the right of refusal in the interests of the state may be exempt from legal action. (Ida Ayu Made Widhasani and Pieter Everhardus Latumeten, 2022).

Furthermore, provisions such as Article 41 paragraph (1) of the Anti-Money Laundering Law, Government Regulation Number 43 of 2015, and Minister of Law and Human Rights Regulation Number 9 of 2017 emphasize the strategic role of notaries in the prevention and eradication of money laundering. Notaries are required to apply the principle of knowing their customers, identifying the beneficial owners of corporations, and reporting through the GRIPS application. (Ichsan Aulia and Kholis Roisah, 2025). The complexity of this task adds to the burden of responsibility of Notaries and requires legal policies that provide certainty and proportional protection.

2. Research Methods

This research is normative legal research, which examines legal issues based on applicable legal norms, legal principles, and legal doctrines. Several research approaches are used, including the Statute Approach, Conceptual Approach, and Analytical Approach.

The types of legal materials used in this study consist of Primary Legal Materials, which are binding legal materials, including Law Number 8 of 2010 concerning the Prevention and Eradication of Money Laundering, Law Number 2 of 2014 concerning Notary Positions, as well as related implementing regulations, and Secondary Legal Materials, which are legal materials that provide explanations of primary legal materials, in the form of legal textbooks, scientific journals, research results, expert opinions, and relevant legal doctrines, as well as Tertiary Legal Materials, which are supporting legal materials that provide additional explanations, such as legal dictionaries and legal encyclopedias.

Next, legal materials are collected through library research by gathering primary, secondary, and tertiary legal materials from various sources, both printed and electronic, including legislation and online scientific journals, and analyzed using qualitative legal analysis techniques using legal interpretation methods, including grammatical, systematic, and teleological interpretation. This technique is used to identify conflicts between norms, examine the legal ratio of norm formation, and formulate legal solutions to the antinomies of the norms being studied.

3. Analysis and Discussion

a. Confidentiality of the Notary Position

Professional secrecy is a fundamental principle in various fields of expertise that places trust at the foundation of the relationship between professionals and those they serve. Scientifically, professional secrecy can be understood as a moral, ethical, and legal obligation to protect sensitive information obtained in professional practice from misuse or disclosure without a valid basis. In this regard, professional secrecy is one of the most important characteristics of the notary profession as an *officium nobile* (noble office) that relies on public trust. Without the guarantee that all information and the contents of deeds will be kept confidential, the parties will not be open and the notary's function as a maker of authentic deeds will collapse (Erwina Junita Sari, 2022).

In professional ethics studies, professional secrecy is rooted in the concept of fiduciary relationships, which are relationships that demand a high level of trust. Professions such as medicine, law, psychology, nursing, and journalism require practices to maintain the confidentiality of their clients' personal data, conditions, or strategic information. This trust allows individuals to be honest and open, so that professional services can be provided optimally and accurately. From a social science and legal perspective, professional secrecy serves as a mechanism for protecting human rights, particularly the right to privacy. This protection is important to prevent psychological, social, and economic harm resulting from information leaks. Therefore, many legal systems establish strict rules regarding professional confidentiality, complete with sanctions for violations, except in certain strictly regulated conditions, such as public safety interests or judicial proceedings.

Psychologically, the application of professional secrecy contributes to a sense of security and interpersonal trust. Research shows that individuals tend to be more cooperative and open when they are confident that their personal information will not be disclosed. This has a direct impact on the effectiveness of professional interventions, such as medical diagnosis, psychological counseling, or legal defense. However, professional secrecy is not an absolute concept. In applied ethics studies, there is a dilemma between maintaining confidentiality and preventing greater harm. Therefore, professional ethics emphasizes the importance of proportional consideration, accountability, and compliance with codes of ethics and legislation.

Thus, professional secrecy can be understood as a key pillar of professionalism that integrates ethical, legal, and scientific aspects. Its existence not only protects individuals, but also maintains the integrity of the profession and public trust in the professional service system as a whole. The obligation to maintain confidentiality is embedded from the outset through the oath/pledge of office. Article 4 paragraph (2) of the Notary Position Law (UUJN) explicitly contains a pledge to maintain confidentiality to the best of one's ability (Junita Sari, 2022).

Article 16 paragraph (1) letter f of the Notary Law stipulates that notaries are obliged to keep confidential all matters relating to the deeds they draw up and all information obtained for the preparation of deeds in accordance with their oath/pledge of office, unless otherwise specified by law (Djuniatno Hasan and Gunarto Gunarto, 2020).

1. Article 54 of the UUJN specifies that notaries may only provide, show, or disclose the contents of minutes, gross copies, copies, or excerpts of deeds to parties with a direct interest, heirs, or beneficiaries as determined by law (Kartika Sasi Wahyuningrum and Sahuri Lasmadi, June 13, 2022).
2. Outside of the UUJN, the protection of professional secrecy is reinforced by:
 - a. Article 322 of the Criminal Code (criminal disclosure of professional secrets) ;
 - b. Article 170 of the Criminal Procedure Code, Article 1909 of the Civil Code, Article 146 of the HIR regarding the right to refuse to provide information due to the obligation to maintain secrecy (Rita Permanasari and Akhmad Khisni, 2018).

This construction makes confidentiality a legal and ethical obligation. Violating confidentiality is not only an ethical violation, but can also be a criminal offense (Reynaldo Saputra, 2024). The notary's right of refusal is a concrete manifestation of the obligation to maintain professional secrecy as specified in Law Number 30 of 2004 concerning the Notary Profession as amended by Law Number 2 of 2014 (hereinafter referred to as the UUJN). Within the framework of the UUJN, the right of refusal does not stand as an independent right, but is attached to the normative obligation of notaries as public officials.

Professional secrecy is implemented through the notary's right to refuse to provide information or opinion regarding matters known to them due to their position. Research explains that Junita Sari, "Implementation of the Notary's Right to Refuse to Confidentiality of the Contents of Notarial Deeds.":

1. Notaries have the right to refuse to provide information to investigators, Supervisory Councils, Notary Honorary Councils (MKN), or judges regarding the contents of deeds and information obtained in the course of their duties.
2. The right to refuse is considered necessary to maintain professional confidentiality, as the Notary Law and Code of Ethics require notaries to uphold the dignity of the profession and public trust.

Thus, when summoned in a case involving a deed, the initial position of a notary is not to disclose, but to maintain confidentiality, unless there is a clear legal basis that overrides professional secrecy.

Explicitly, Article 4 of the UUJN stipulates that before taking office, notaries must take an oath or pledge to keep confidential the contents of deeds and information obtained in the performance of their duties. From a scientific point of view, this oath of office forms the philosophical and ethical basis of the right of refusal, as it places confidentiality as a core value in notarial practice.

Furthermore, Article 16 paragraph (1) letter f of the UUJN regulates the obligation of notaries to keep confidential everything related to the deeds they draw up and the information obtained for the purpose of drawing up deeds, unless otherwise specified by law. This provision indicates that the right to refuse to disclose information is a logical consequence of legal obligations. In other words, when a notary refuses to provide information, this action does not constitute an obstruction of legal proceedings, but rather the fulfillment of a legal obligation.

In the context of procedural law, Article 66 of the UUJN provides specific regulations regarding the summoning of notaries by investigators, public prosecutors, or judges. Such summons can only be issued with the approval of the Notary Honorary Council (MKN). Scientifically, this mechanism reflects the principle of functional protection of office, namely the protection of notaries so that their right to refuse to testify is not arbitrarily violated in the judicial process. From a legal theory perspective, the provisions of Article 66 of the UUJN demonstrate the legislator's efforts to balance two interests :

1. The interests of law enforcement, and

2. The interests of protecting official secrets and public trust.

Thus, the notary's right of refusal is not absolute, but is limited by legal procedures. If the interests of justice require the disclosure of the contents of a deed, such disclosure can only be carried out through mechanisms that are explicitly regulated by the UUJN .

Overall, the notary's right of refusal in the UUJN serves as a legal instrument to maintain the integrity of the notary's position, guarantee legal certainty for the parties, and protect the value of trust in civil legal relationships. Its confirms that notaries are not mere witnesses or parties to a legal event, but public officials who have ethical and legal responsibilities regarding the confidentiality of information entrusted to them. Furthermore, the confidentiality of the position does not only concern the content of the deed, but also (Yoseph Freinademetz Kantar, Jelly Nasser, and Anriz Nazruddin Halim, 2022).

1. The identities of the parties and other related parties;
2. Statements, documents, and data provided to the notary in the pre-deed phase;
3. Notarial protocol: minutes, attachments, and letters attached to the deed, which will later become state archives.

The prohibition on disclosing secrets also means Sasi Wahyuningrum and Lasmadi, "Legal Protection for Notaries in Carrying Out Their Duties and Functions as Public Officials.":

1. Not submitting the original document, copies, excerpts, or showing the minutes to parties who are not concerned;
2. Not providing material explanations beyond the permitted limits to third parties, including in litigation proceedings, except on the basis of statutory provisions or permission from the competent Council.

A major problem arises in practice when notaries are called as witnesses or even suspects in criminal or civil cases related to crimes. Several important findings Kantar, Nasser, and Halim, "Legal Protection for Notaries in Implementing Official Secrecy Regarding Deeds They Make Related to Internal Disputes Between Parties in Court.":

1. Many investigators ignore the notary's obligation to keep deeds confidential and assume that by appearing in court, the notary must automatically disclose the entire contents of the deed.
2. This often causes notaries to be "forced" to provide information beyond what is necessary, thereby effectively violating their oath of office.
3. The UUJN stipulates that requests for photocopies of minutes and the summoning of notaries related to deeds must be approved by the Notary Honorary Council (MKN) (Article 66). The aim is to balance the interests of law enforcement with the protection of professional confidentiality.

However, several Constitutional Court decisions and unclear implementing regulations (eg, Article 66(4) of the UUJN after amendment) have created room for

direct examination without MKN filtering, thereby rendering confidentiality protection ineffective (Permanasari and Khisni).

The development of anti-money laundering and counter-terrorism financing regimes has given rise to a sharp conflict of norms:

1. On the one hand, the UUJN and the oath of office demand absolute confidentiality;
2. On the other hand, Government Regulation No. 43/2015 and Minister of Law and Human Rights Regulation no. 9/2017 require notaries to apply the Know Your Customer (KYC) principle and submit Suspicious Transaction Reports (STR) to the Financial Transaction Reports and Analysis Center (PPATK) (Tejakusuma et al., 2024).

Some important points Saputra, “Legal Protection for Notaries Regarding the Obligation to Implement the Principle of Identifying Service Users (PMPJ) and Reporting Suspicious Financial Transactions (LTKM).”:

1. Morally and functionally, client confidentiality is a fundamental principle of the legal profession; without it, the relationship between clients and notaries is fragile.
2. However, the phrase “unless otherwise specified by law” in Article 16 paragraph (1) letter f of the UUJN provides a loophole whereby, in certain circumstances, professional confidentiality may be set aside in the interests of the wider public, for example to prevent money laundering/terrorist financing.
3. The FATF also emphasizes that professional confidentiality is not an absolute obligation and may be set aside if there is a legal order in the public interest, including the obligation to report suspicious transactions.

Problematic areas (Riska Salmaningrum, Abdul Madjid, and Dyah Aju Wisnuwardhani, 2025).

1. The obligations of PMPJ and LTKM are primarily regulated in government regulations and ministerial regulations, rather than at the level of law, so that hierarchically they appear to be lower than the UUJN and cause legal uncertainty.
2. Notaries are in a dilemma: if they comply with the Ministry of Law and Human Rights Regulation and Government Regulation (reporting to PPATK), they worry about being accused of violating confidentiality; if they uphold confidentiality, they risk being considered as neglecting their reporting obligations.

Several proposed solutions (Varent Nathalia Putri and Rouli Anita Valentina, 2022).

1. Harmonization of regulations: harmonizing the PPTPPU Law, UUJN Law, PP 43/2015, and Permenkumham No. 9/2017, for example by emphasizing that reporting suspicious transactions is not a violation of professional secrecy but a legitimate exception based on the law.

2. Explicit legal protection: whistleblowers cannot be prosecuted criminally or civilly for reporting in good faith, and are protected from physical and non-physical threats.

The confidentiality of official positions cannot be optimally maintained without effective and systematic legal protection, because without such normative guarantees, the obligation to keep official information confidential will be vulnerable to violation by external pressures, particularly in the process of law enforcement. Therefore, this study maps the forms of legal protection for the confidentiality of official positions into two main categories, namely:

1. Preventive protection
 - a. Clear regulations regarding the procedures for summoning and examining notaries (Article 66 of the Notary Law; role of the MKN) (Nadhea Tungga Devi and Ariawan Gunadi, 2024).
 - b. Affirmation of the right to refuse and its limits, so that notaries cannot be easily forced to disclose secrets outside of the provisions (Djunaedi Djunaedi, 2021).
 - c. Mechanisms for professional supervision by the Supervisory Council and professional organizations (INI) to ensure that the code of ethics and confidentiality are adhered to and protected (Wahyu Satya Wibowo, Johni Najwan, and Firdaus Abu Bakar, 2022).
2. Repressive protection
 - a. Legal assistance and defense when notaries are criminalized for their actions in maintaining or disclosing official secrets. Djunaedi, "Juridical Analysis Related To Confidentiality Of Notary Liability."
 - b. Recognition that when notaries disclose secrets in accordance with the law or a valid court order, they should enjoy legal immunity and cannot be prosecuted for breach of official secrecy (Djunaedi, 2021).

Interestingly, protection of professional secrecy is primarily attached to notaries as public officials, not to notary employees. This is reflected in various studies examining the position of notary employees as witnesses in authentic deeds, which show that legal protection of the obligation to keep the contents of deeds and statements by the parties confidential is not given equally to notary employees, as follows (Putu Putri Nugraha and I Nyoman Bagiastra, 2022):

1. Notary employees only prepare deeds and act as witnesses to the instruments; the contents of the deeds remain the responsibility of the notary.
2. The UUJN does not require employees to take an oath of secrecy, so when they testify in court about the contents of a deed, there is no formal legal obligation to keep it confidential.
3. This situation creates a loophole: professional secrecy can be "leaked" through employees, while the focus of protection is only on notaries (Chrisya Nadine Immanuella and Siti Hajati Hoesin, 2022).

The confidentiality of office cannot be separated from the integrity of notaries as public officials who perform legal services to the community. Integrity is the main foundation in the execution of the notary's duties, because it is through integrity that the trust of the parties in the notary can be built and maintained. Without strong integrity, the obligation to maintain professional secrecy has the potential to be reduced to mere formal compliance with the rules, rather than an ethical commitment inherent to the profession. Therefore, professional secrecy must be understood as a manifestation of the personal and professional integrity of notaries in carrying out their duties and authorities Satya Wibowo, Najwan, and Abu Bakar, "Integrity of Notaries as Officials Making Authentic Deeds in the Notary Position Law."

Conceptually, notarial integrity is understood as the unity between conscience, speech, and actions in daily professional practice. This integrity is reflected in an attitude of honesty, independence, impartiality, and consistency in protecting the legal interests of the parties served. With such integrity, notaries not only act as authentic document makers, but also as guardians of justice and legal certainty. This attitude requires notaries not to misuse the information obtained in their position, and to treat the confidentiality of their position as a form of moral and legal responsibility that must be upheld in all of their professional actions.

The emphasis on ethics in the notary profession places the obligation to maintain confidentiality as an integral part of the notary's moral responsibility to clients and the wider community. This obligation is not solely driven by the threat of legal sanctions (Abiandri Fikri Akbar and Akhmad Budi Cahyono, 2021), but rather rooted in professional ethics that demand honesty, trustworthiness, and respect for the trust of all parties. From a professional ethics perspective, confidentiality reflects the notary's commitment to maintaining the dignity of the position and ensuring that all information obtained in the performance of their duties is used responsibly and not misused.

On the other hand, violations of professional confidentiality obligations, especially those committed with dishonest motives such as colluding to leak information to benefit certain parties, can have serious legal consequences. Various studies show that such violations have the potential to subject notaries to civil sanctions, administrative sanctions, and even criminal sanctions, depending on the nature and impact of the committed violation. Therefore, from various normative and empirical studies, it can be summarized that professional confidentiality is a fundamental principle that has both ethical and legal dimensions in notarial practice.

Consequently, academic discourse consistently emphasizes the importance of formulating a clearer and more comprehensive legal and ethical framework regarding notarial confidentiality. Academics agree that without clear and measurable limits, the obligation to maintain confidentiality has the potential to create legal uncertainty, both for notaries and for law enforcement officials. Therefore, regulations are needed that explicitly determine when professional secrecy must be maintained, under what conditions such secrecy can or must be disclosed, and to what extent information may be disclosed without violating the principle of confidentiality.

In addition to the clarity of normative boundaries, scientific studies also highlight the urgency of strengthening legal protection for notaries in two equally risky situations. First, protection when notaries exercise their right of refusal to disclose confidential information in order to maintain the trust of the parties and comply with their legal obligations. Second, protection when notaries disclose confidential information based on a valid legal order, such as in the context of legal proceedings, so that such actions do not give rise to legal or ethical consequences in the future. Various studies show that without adequate protection in both conditions, notaries are in a dilemma between the obligation to keep information confidential and the demands of law enforcement, which can ultimately weaken the strategic function of notaries as public officials who guarantee legal certainty and security Nadhea Tungga Devi and Ariawan Gunadi, "Legal Protection of the Office of Notary against the Principle of Confidentiality in View of Article 66 Paragraph (4) of the Notary Law."

Conflict of Interest of Notaries in Their Position

In legal science, the concept of normative antinomy is used to describe a situation in which there is a conflict between two or more norms, each of which has equal legal force and is legally valid. This conflict arises when these norms regulate the same object, event, or behavior, but substantively cannot be applied simultaneously without causing legal contradictions or uncertainty in practice. In other words, normative antinomy indicates an internal conflict within the legal system, whereby the application of one norm may obstruct or contradict another. This situation requires the authorities to make a legal choice, whereby one norm is used as the primary reference while the other is set aside.

The phenomenon of normative antinomy is not only theoretical in nature, but also has significant practical implications in law enforcement. In practice, judges, administrative officials, or law enforcement officials must conduct a legal analysis to determine which norms are most relevant, proportional, and in accordance with the principles of justice. The selection of these norms usually considers legal principles such as *lex specialis derogat legi generali* (special rules override general rules) and *lex superior derogat legi inferiori* (higher rules override lower rules), while also taking into account the principles of legal certainty, legal benefit, and protection of the rights of the parties involved.

Conceptually, normative antinomy reflects the complexity of modern multilayered legal systems, in which norms can originate from various legal sources, including laws, government regulations, local regulations, and international norms adopted into domestic law. The existence of normative antinomy requires a deep understanding of the hierarchy of law, the relationship between norms, and the legal objectives to be achieved. Without this understanding, the application of law risks becoming inconsistent, contradictory, and potentially detrimental to legal certainty and justice for society.

A clear example of normative antinomy in Indonesia can be found in land law cases, where the Basic Agrarian Law (UUPA) regulates land ownership rights in general,

but specific rules regarding concessions or mining permits can cause conflicts when the rights of indigenous peoples overlap with company permits. In the criminal sphere, antinomy also arises when the Anti-Money Laundering Law requires the reporting of suspicious transactions, but rules on professional confidentiality for notaries or certain officials limit the obligation to disclose such information. These examples show that normative antinomy is not merely an academic issue, but a real phenomenon that requires law enforcement officials to interpret the law carefully and selectively in order to uphold the principles of justice, legal certainty, and the public interest (Dwi Ibadhillah, Sjaifurrachman Sjaifurrachman, and Abshoril Fithry, 2025).

Some studies equate antinomy with norm conflict (Ibadhillah et al., 2025):

1. Occurs when there are two conflicting norms in one regulatory object, so that logically only one norm can be used.
2. Antinomies can arise between laws and regulations as well as between legal principles or principles (eg, between justice, certainty, and benefit) (I Wayan Budha Yasa, 2023).

Antinomies are seen as an inevitable phenomenon in legal systems due to the large number of regulations, the broad scope of regulated areas, and the dynamic nature of law as it evolves with society (E. Nurhaini Butarbutar, 2012)..

In legal science, the concept of normative antinomy is used to describe a situation in which there is a conflict between two or more norms that are equally valid and have legal force. This conflict arises when these norms regulate the same object, event, or behavior, but substantively cannot be applied simultaneously without causing legal uncertainty or contradiction. In other words, normative antinomy occurs when the application of one norm would obstruct or conflict with the application of another norm, thereby creating a dilemma for law enforcement officials in determining which norm should be used as the basis for their decision. According to Soerjono Soekanto, normative antinomy is a normative conflict within the legal system that creates legal uncertainty when conflicting norms must be applied simultaneously (Soerjono Soekanto & Sri Mamudji, 2004), so that the mechanism for selecting the appropriate norm becomes very important.

The phenomenon of normative antinomy is not only theoretical in nature, but also has significant practical implications in law enforcement. In practice, judges, administrative officials, or law enforcement officials must conduct a legal analysis to determine which norms are most relevant, proportional, and in accordance with the principles of justice. Jimly Asshiddiqie explains that in situations of antinomy, law enforcement officials can use the principles of *lex specialis derogat legi generali* (special rules override general rules) or *lex superior derogat legi inferiori* (higher rules override lower rules). In addition, the principles of legal certainty, legal benefits, and protection of the rights of the parties involved are also important considerations in choosing which norms to apply Jimly Asshiddiqie, *Constitutional Law and the Pillars of Democracy* (Jakarta: Constitution Press, 2006), 152..

Conceptually, normative antinomy reflects the complexity of modern multilayered legal systems, in which norms can originate from various regulations, including laws, government regulations, regional regulations, and international norms adopted into domestic law. Peter Mahmud Marzuki (2011) divides normative antinomy into horizontal antinomy, which is a conflict between norms that are equal in hierarchy, and vertical antinomy, which is a conflict between norms of different levels. Understanding the hierarchy and relationships between norms is important so that the application of law remains consistent, rational, and fair, even when faced with normative conflicts that cannot be resolved simply.

In the context of Money Laundering Crimes (TPPU), normative antinomies can arise when there is a conflict between the obligation to report suspicious transactions and professional confidentiality rules. For example, the AML Law requires strategic professions, including notaries and Land Deed Officials (PPAT), to report transactions suspected of being the proceeds of crime to the Financial Transaction Reports and Analysis Center (PPATK). However, notaries also have an obligation to maintain professional confidentiality in accordance with the Notary Profession Law (UUJN) and professional ethics. This situation creates a normative dilemma: disclosing information in accordance with the Anti-Money Laundering Law may be considered a violation of professional confidentiality, while maintaining confidentiality may be considered a neglect of reporting obligations. This example shows that normative antinomy is not merely an academic issue, but a reality that requires careful and contextual legal interpretation.

Several experts emphasize the importance of mechanisms for resolving normative antinomies in order to maintain the consistency of the legal system. Satjipto Rahardjo states that antinomies can be resolved through contextual legal interpretation, adjustment of the hierarchy of norms, or the formation of new norms that accommodate conflicting interests (Satjipto Rahardjo, 2000). In TPPU practice, this mechanism can take the form of the application of notary privilege, whereby notaries can refuse to disclose confidential information if there is no valid legal order, while still complying with reporting procedures if a legal order is issued. Thus, normative antinomies can be addressed without compromising professional integrity or legal certainty.

In addition, the antinomy of norms in TPPU practice also emphasizes the importance of collaboration between law enforcement agencies, financial supervisory institutions, and strategic legal professions. When notaries, PPATs, and financial institutions face conflicts between reporting obligations and confidentiality obligations, they must follow established legal guidelines and standard operating procedures so that the resolution of antinomies does not cause legal losses to any party. This approach is important to ensure that the legal system remains effective in preventing and combating money laundering, while still respecting professional rights and ethical principles.

Thus, normative antinomy is not only a normative phenomenon, but also a determining factor in the effectiveness of law enforcement, especially in Indonesia's complex legal system with its many sources of law. Proper understanding,

management, and resolution of normative antinomies enable notaries, PPATs, law enforcement officials, and related institutions to act consistently, fairly, and professionally. This ensures that the principles of justice, legal certainty, and public interest are upheld, while strengthening efforts to prevent and eradicate money laundering in Indonesia.

Conflicts/normative antinomies are usually distinguished into (Maria Virginia Usfunan, 2020).

1. Vertical

Conflict between norms of different levels in the hierarchy, for example (Usfunan, 2020):

- a. Laws with Government Regulations;
- b. Laws with Ministerial Regulations.
- c. Example: differences in the regulation of authority to resolve conflicts of norms between the Law on the Formation of Legislation and Permenkumham No. 2 of 2019, which is considered a vertical conflict, meaning that Permenkumham must be set aside.

2. Horizontal

Conflict between norms of equal rank, for example two laws of equal rank that regulate the same object with different content, or between two technical regulations of the same level (M.. Noor Fajar Al Arif F. and Pipih Ludia Karsa, 2021).

Beyond that, there is also a discussion of antinomies at a fundamental level, such as the tension between legal certainty, justice, and utility in the enforcement of law by judges I Wayan Budha Yasa, "Legal Reasoning And Hla Hart's Legal Concept As A Solution To Reduce Antinomy Symptoms In Law Enforcement In Indonesia."

In legal science, normative antinomies can be divided into several types, one of which is vertical antinomies and horizontal antinomies, each of which has different characteristics and legal implications. This classification helps legal officials, academics, and practitioners understand normative conflicts and determine mechanisms for resolving them. This grouping is important for understanding how conflicting norms arise in modern legal systems that are multilayered and complex (Peter Mahmud Marzuki, 2008).

Vertical antinomy occurs when there is a conflict between norms of different levels in the legal hierarchy. For example, a law may conflict with a government regulation, or a government regulation may conflict with a regional regulation, giving rise to a normative dilemma in its application. In a vertical context, the higher-level norm in the hierarchy is usually the main reference in resolving conflicts, in accordance with the principle of *lex superior derogat legi inferiori*. Soerjono Soekanto states that vertical antinomy often arises due to rapid legal developments and the existence of new regulations that are not yet fully harmonized with old regulations, so that law enforcement officials must interpret which norm takes priority Soerjono Soekanto & Sri Mamudji, *Normative Legal Research: A Brief Review* , 135..

Meanwhile, horizontal antinomy occurs when there is a conflict between norms that are equal or equivalent in the legal hierarchy, for example between two laws that are equally valid but regulate the same event or object differently. In this situation, the selection of norms cannot be based on hierarchy, but must use other approaches, such as the principle of *lex specialis derogat legi generali*, where specific rules override general rules, or through legal considerations and the legal objectives to be achieved. Jimly Asshiddiqie emphasizes that horizontal antinomy requires law enforcers to conduct careful normative interpretation so that the principles of justice, legal certainty, and legal benefit are maintained Asshiddiqie, Constitutional Law and the Pillars of Democracy , 152..

A clear example of vertical antinomy can be found when certain local regulations conflict with the Basic Agrarian Law (UUPA) regarding land ownership rights. For example, a local regulation stipulates a more lenient procedure for land acquisition than the UUPA, creating a dilemma for law enforcement officials as to whether they should follow local regulations or national law. Meanwhile, an example of horizontal antinomy can be seen when two laws regulate the obligation to report suspicious transactions in Money Laundering Crimes (TPPU), but use different criteria or reporting mechanisms, so that notaries or PPATs face a conflict in determining which norms to apply without violating their professional confidentiality.

Understanding vertical and horizontal antinomies is very important in legal practice in Indonesia, because the Indonesian legal system is multilayered with various sources of law originating from laws, government regulations, regional regulations, and international norms. According to Satjipto Rahardjo, antinomies must be resolved through contextual legal interpretation, adjustment of the hierarchy of norms, or the formation of new norms that accommodate conflicting interests, so that the principles of justice, legal certainty, and public interest are upheld (Satjipto Rahardjo, 2006).

In law enforcement practice, there is often antagonism but also mutual dependence between Butarbutar, "Antinomy In The Application Of The Principle Of Legality In The Process Of Legal Discovery.":

1. the principle of legal certainty;
2. the principle of justice;
3. the principle of benefit.

Antinomy here means (Butarbutar, 2012):

1. If the law is applied strictly according to the text, certainty increases but a sense of justice may be compromised (for example, the proverb *summum ius summa iniuria*).
2. If judges place too much emphasis on casuistic justice and utility, legal certainty and predictability decline.

Therefore, in theory, these principles are not abolished, but must be balanced through legal reasoning and legal theory. Normative law provides several principles of preference for resolving concrete conflicts of norms (particularly in legislation). Here

are some examples of application (Made Pramanaditya Widiada and Desak Putu Dewi Kasih, 2022).

1. The conflict between the Land Transportation Law and the Government Regulation governing the dimensions of motor vehicles is resolved by *lex superior derogat legi inferiori*.
2. Conflicts between the Law on the Formation of Legislation and Ministry of Law and Human Rights Regulation No. 2 of 2019 concerning the Resolution of Disharmony in Legislation through Mediation are resolved by enforcing the Law and setting aside the Ministry of Law and Human Rights Regulation.
3. Conflicts between the Limited Liability Company Law and Government Regulations regarding the regulation of PT capital are resolved by enforcing the provisions of the Law as the higher norm.

For antinomies between principles (not between articles), the solution is not sufficient with hierarchical techniques, but rather through legal theory and interpretation I Wayan Budha Yasa, "Legal reasoning and hla hart's legal concept as a solution to reduce antinomy symptoms in law enforcement in indonesia.":

1. Judges are required to strike a balance between justice and legal certainty in specific cases.
2. Legal theory (not merely dogma) is necessary to resolve conflicts of values that cannot be resolved simply by reading the text of the norm.
3. HLA Hart's concept of law and sound legal reasoning are considered helpful in alleviating the antinomy between certainty, justice, and utility.

It is necessary to repeat that antinomy is:

1. Cannot be completely eliminated , because law always lies between value demands (legal philosophy) and policy (legal politics).
2. In fact, it shows that the legal system contains various conflicting values, for example between stability and dynamism, freedom and order, unification and pluralism.
3. The task of legal science is to provide conceptual tools and principles for managing, not eliminating, antinomies; while the task of judges is to concretize that balance in their decisions.

T hus, from a legal perspective, normative antinomy is understood as:

1. an inevitable phenomenon in the normative system;
2. both a technical and theoretical issue;
3. the main object of the work of the principle of preference, legal theory, and judicial reasoning to maintain legal certainty without sacrificing justice and utility .

4. Conclusion

The legal norm between the Notary's obligation to report suspicious financial transactions and the obligation to maintain the confidentiality of the Notary's position

is essentially a conflict between the norm of protecting individual interests and the norm of protecting public interests. In the Indonesian legal system, this conflict can be resolved through the application of the principle of legal preference, specifically the principles of *lex specialis derogat legi generali* and *lex superior derogat legi inferiori*. The provisions of laws and regulations concerning the prevention and eradication of money laundering as specific and imperative laws override the general provisions concerning the confidentiality of the notary's position. Thus, the fulfillment of the obligation to report suspicious financial transactions by Notaries cannot be classified as a violation of professional secrecy, but rather constitutes a legitimate and legally justified exception. As long as the reporting is carried out in accordance with the provisions of laws and regulations, the principle of prudence, and good faith, Notaries are granted legal protection for the performance of this obligation. This also confirms that the principle of professional secrecy of Notaries is not absolute, but can be limited to the interests of a broader legal interest, namely the prevention and eradication of money laundering crimes.

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