

Analysis of PPATK's Authority in Blocking Dormant Accounts Indicated by Criminal Offenses: Perspectives of Due Process of Law and Legal Certainty

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Abstract

This article analyzes the authority of the Pusat Pelaporan dan Analisis Transaksi Keuangan (PPATK) in requesting the temporary suspension of transactions on dormant accounts linked to money laundering. It examines how PPATK's administrative-intelligence authority operates within criminal law when dormant status, originally an administrative category, becomes associated with criminal suspicion. Using normative juridical research with statutory and conceptual approaches, this study examines Law No. 8 of 2010, PPATK Regulation No. 18 of 2017, POJK No. 24 of 2025, criminal doctrine, due process of law, and legal certainty. The findings show that a temporary suspension creates problems when account dormancy is treated as a criminal indicator without specific parameters for suspicion. Such practice may produce a presumption of suspicion and blur the boundary between financial intelligence, investigation, and judicial proof. It argues that PPATK is a preventive actor whose authority must be governed by legality, proportionality, the presumption of innocence, due process, and Dignified Justice.

Keywords

PPATK; Rekening Dormant; Due Process of Law; Kepastian Hukum; Keadilan Bermartabat

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1. INTRODUCTION

In contemporary legal discourse, the tension between state security and the protection of citizens' rights remains one of the most problematic terrains in the rule of law (Kyomuhendo, 2024; Paleri, 2022). This tension is especially visible in economic criminal law, where the state must respond to financial crimes that move quickly, cross institutional boundaries, and are often hidden behind transactions that appear administratively ordinary. The state cannot be passive because it has a constitutional responsibility to protect the integrity of the financial system from the proceeds of crime, including money laundering, terrorism financing, corruption, fraud, embezzlement, cybercrime, and other predicate offenses (Abel Souto, 2022; Mustari & Rahman, 2026; Nizovtsev et al., 2022; Olujobi & Yebisi,



2023; Trendafilova, 2025). However, every state intervention must remain bound by legality, fair procedure, proportionality, and rational review. (Chidiebere Nwaokocha, 2022; Ochnio, 2021)

In this context, the state needs legal instruments for early detection, prevention of asset movement, and tracing of financial flows before criminal proceeds are further disguised. However, because such measures operate within the sphere of criminal law, they must still respect legality, the presumption of innocence, valid proof, proportionality, and due process of law. Criminal law is concerned not only with the effectiveness of the state in pursuing offenders, but also with how state power is restrained so that suspicion does not become punishment and preventive action does not impose criminal stigma before proof is established in court. (Butt, 2023)

This problem is evident in the debate over the authority of the Financial Transaction Reports and Analysis Center (PPATK) as Indonesia's Financial Intelligence Unit (FIU). As an FIU, PPATK receives, analyzes, and submits financial transaction analysis to law enforcement agencies. PPATK is neither an investigator that determines criminal liability nor a court that decides whether an asset is connected to a crime. Its function remains within financial intelligence and early detection. Therefore, PPATK has no direct authority to block accounts by independently freezing or confiscating assets. Under Article 65 paragraph (1) of Law Number 8 of 2010, PPATK may request financial service providers to temporarily suspend all or part of a transaction known or suspected to constitute proceeds of crime. Nevertheless, this administrative-intelligence authority may still produce serious legal consequences when it affects certain accounts, including dormant accounts.

Dormant accounts were initially a banking administrative category referring to accounts with no transaction activity for a certain period (Manopo et al., 2026; Prabowo et al., 2026). Dormant status is not identical to criminal conduct. An account may become inactive due to forgetfulness, relocation, discontinuation of banking services, work abroad, death without immediate notification to heirs, limited financial literacy, or deliberate inactivity (Force, 2013). Thus, account passivity does not necessarily indicate money laundering and should be understood as an administrative condition rather than a criminal offense. (Prabowo et al., 2026; Rovida et al., 2026)

However, recent developments show that dormant accounts can no longer be treated solely as administrative banking issues. Passive accounts may become vulnerable points in the financial ecosystem because they can be misused for theft, identity misuse, illegal activation, criminal fund collection, terrorism, and money laundering. PPATK data show significant risk escalation. Since 2020, PPATK has analyzed more than one million accounts suspected of involvement in criminal acts, including long-inactive accounts (Tribrata News Polri, 2025). There were also findings of more than 10 million social assistance recipient accounts untouched for more than three years and more than 2,000 dormant accounts belonging to government agencies and expenditure treasurers, containing around

Rp500 billion (Roshali, 2025). The vulnerability is also illustrated by the break-in of dormant accounts worth IDR 204 billion at a state-owned bank, involving the reactivation of accounts without the lawful owner's knowledge, transfers of funds to shell accounts, and efforts to disguise the origin of funds (Tribrata News Polri, 2025). Dormant accounts, therefore, carry a double risk: they may become targets of predicate offenses and may also be used to launder criminal proceeds. (Yudianto & Imaniyanti, 2026)

Otoritas Jasa Keuangan issued POJK Number 24 of 2025 on Account Management at Commercial Banks, which standardizes the definitions of active, inactive, and dormant accounts. Dormant accounts are associated with five consecutive years, or 1,800 days, of inactivity. From a banking perspective, this regulation strengthens data governance, risk mitigation, customer due diligence, and financial system protection. However, a criminal law problem arises when dormant administrative status intersects with PPATK's authority under the money laundering regime. Law Number 8 of 2010 and PPATK Head Regulation Number 18 of 2017 authorize PPATK to request the temporary suspension of transactions known or suspected to be related to criminal acts. Thus, dormant accounts as an administrative category must be distinguished from accounts suspected of criminal involvement. Dormant status may serve as an initial risk indicator. However, it cannot automatically become a criminal indication without specific parameters, such as suspicious transaction patterns, links to predicate crimes, false identities, nominee accounts, or fund flows inconsistent with the account owner's profile. (Huda, 2025)

The legal implication is serious. When temporary suspension is widely applied to dormant accounts, administratively inactive accounts risk being equated with accounts that have criminal indications. This may create a presumption of suspicion before valid proof exists. In criminal law, suspicion may justify preventive action, but it cannot be treated as proof. Due process requires a justifiable basis of suspicion, adequate notice, opportunity for clarification or objection, clear time limits, and independent review. In practice, account owners may only discover restrictions when attempting transactions, while the burden of restoring access shifts to them through bank verification. This is problematic because it may suggest that account owners must prove non-involvement, whereas the presumption of innocence places the burden of proof on the state. This issue must also be distinguished from limited reverse proof under Articles 77 and 78 of the TPPU Law, which applies only during court proceedings and remains under judicial control.

Previous studies have discussed PPATK authority, customer protection, and banking compliance, but most still focus on formal legality, consumer protection, or the role of banks. Nurmariani et al. (2025) examine the limits of PPATK's authority; Wulandari and Sembiring (2022) focus on customer protection in digital banking; Yuspin & Putri (2020) discuss dormant accounts in Islamic banking and civil-guarantee relations; and Aurelia et al. (2025) examine banks' preventive role through Know Your Customer and suspicious transaction reporting. Unlike these studies, this article evaluates PPATK's

authority from a procedural-criminal perspective, viewing dormant accounts as a nexus among economic criminal law, administrative law, banking law, and the protection of subjects who have not been proven guilty.

Therefore, this article aims to answer two main questions: first, what are the juridical implications of the implementation of PPATK's authority in temporarily suspending transactions on dormant accounts based on Law Number 8 of 2010, juncto PPATK Head Regulation Number 18 of 2017 on the legal position of account owners in the context of criminal law in Indonesia? Second, does the mechanism for blocking dormant accounts carried out en masse on the grounds of indications of criminal acts meet the standards of the principle of Due Process of Law and the principle of legal certainty in accordance with the Theory of Dignity Justice?

2. METHODS

This study employs normative legal research or doctrinal legal research because the issue concerns normative conflict, ambiguity of authority, and regulatory gaps in the temporary suspension of dormant accounts linked to criminal acts (Majeed et al., 2023; Raof et al., 2025). Law is treated as a system of norms consisting of legislation, principles, doctrines, and court decisions, so the analysis focuses on the coherence, consistency, and legitimacy of PPATK's authority.

The study applies statutory and conceptual approaches (Hamzani et al., 2023; Negara, 2023). The statutory approach examines the 1945 Constitution, Law Number 8 of 2010, Presidential Regulation Number 50 of 2011, POJK Number 24 of 2025, and PPATK Regulation Number 18 of 2017. The conceptual approach uses doctrines of state power, administrative justice, due process, legal certainty, presumption of innocence, criminal proof, and Dignified Justice (Crema & Solum, 2022; Stivers et al., 2023). Legal materials are collected through library research and analyzed qualitatively and prescriptively using deductive reasoning.

Conceptual Framework

This study is built on a conceptual framework that treats the blocking or temporary suspension of dormant accounts as a legal issue at the intersection of PPATK's financial intelligence authority, economic criminal law, and the protection of subjects who have not been proven guilty. Dormant accounts cannot be understood merely as a banking technical issue because, once used as an entry point for temporary suspension, they raise questions about administrative-intelligence limits, criminal suspicion, preventive legitimacy, legal certainty, the presumption of innocence, due process, and evidentiary standards.

The main theory used is Dignity Justice, popularized by Teguh Prasetyo (Prasetyo, 2025; Prasetyo & Sinambela, 2023; Teguh Prasetyo, 2019; Teguh Prasetyo et al., 2025, 2026; Widharta et al., 2025; Williasari et al., 2023), which requires law to humanize legal subjects. As a middle-range theory, due process of law is used to assess notice, reasons, clarification, and neutral review (Galligan, 1997). As applied theories, legal certainty and asset recovery are used to balance predictable norms and the state's interest in tracing criminal proceeds. (Borowski, 2024; Radbruch, 1932)

3. FINDINGS AND DISCUSSION

3.1. State Coercion: The Problem of Legality, Proportionality, and Customer Property Rights in Blocking Dormant Accounts

The temporary suspension of transactions on dormant accounts cannot be treated as a banking technical measure. It lies at the intersection of financial intelligence, banking administration, and criminal law enforcement in money laundering cases. The issue is not only whether PPATK may request suspension, but how this authority is applied to passive accounts associated with criminal risk. Dormant status is not an element of money laundering; it is an administrative category arising from the absence of transaction activity. Temporary suspension under the anti-money laundering regime should rest on indicators linking an account or transaction to criminal proceeds, a predicate offense, or concealment of asset origins.

Accordingly, account passivity cannot automatically become a basis for criminal suspicion without accountable parameters. This article does not assume that PPATK's measures are based solely on dormant status. Public information frames the policy as preventive, aimed at protecting passive accounts from misuse and encouraging verification. However, PPATK's criteria for distinguishing inactive accounts from accounts carrying criminal risk are not fully public. The problem lies in separating administrative risk, reasonable suspicion, and criminal proof. Suspicion may justify preventive measures, but it must remain distinct from proof of guilt. Temporary suspension should prevent assets from being moved or disguised, not mark the account holder as criminally connected before proof in court.

POJK Number 24 of 2025 defines dormant accounts as accounts with no deposit, withdrawal, or balance inquiry activity for more than 1,800 days. Its normative basis is inactivity, not criminal suspicion. The regulation aims to strengthen account governance, customer data updating, and banking risk control (OJK, 2025). However, when this administrative status serves as the entry point for PPATK's suspension request, the legal character changes: passive accounts may be subject to restrictions on access to property. Here, the boundary between banking administration and state coercion becomes blurred.

Formally, PPATK's authority rests on Law Number 8 of 2010, particularly Article 65 paragraph (1), which authorizes PPATK to request that financial service providers suspend transactions suspected of money laundering. Article 65, paragraph (2) adds a procedural limit by requiring an official report of the suspension. This safeguard records the legal basis, object, and scope of the measure. Still, authority alone does not settle substantive legality. A rule-of-law system requires clear conditions, limits, procedures, and review. Treating dormant accounts as suspicious risks, shifting from individualized to generalized suspicion, even though passivity may result from negligence, relocation, death, old accounts, limited literacy, or non-criminal reasons.

The state has a legitimate aim of preventing money laundering, protecting customer funds, and closing opportunities for misuse. PPATK stated that suspension was intended to encourage re-verification and protect dormant accounts from irregularities, and that it had analyzed 122 million dormant accounts, with more than 100 million, or around 90 percent, returning to active status (PPATK, 2025). However, the scale of intervention increases procedural accountability. The broader the state action, the stricter the justification: the measure must be necessary, measurable, and not excessive.

AML policy contains a paradox. It is necessary to pursue criminal proceeds through follow-the-money methods, but this may impose compliance burdens and restrictions that are not always proportional to asset recovery (Stessens, 2000). Money laundering is difficult to control because it operates through complex, cross-border, adaptive networks (Levi & Reuter, 2006), while AML regimes are often costly and not always effective in confiscating proceeds (Pol, 2018). Asset recovery remains crucial because financial criminals may fear losing illicit gains more than punishment. Still, recovery must not erase procedural limits. Yoserwan & Dias (2024) show that AML law can optimize the recovery of corruption assets, while Ochnio (2021) warns that weak links among identification, freezing, confiscation, and review create a legal limbo.

Thus, dormant account blocking must be tested against the criteria of legality, proportionality, and protection of property. Property rights are not absolute, but restrictions require a legal basis, a legitimate aim, necessity, notice, written reasons, fixed time limits, prompt objection, and independent review. FATF's risk-based approach cannot justify mass suspicion; it must remain proportionate and sensitive to the risk of financial exclusion (Force, 2013). Dormant accounts may be risk markers, but not automatic grounds for restriction without individual verification. PPATK's authority remains important, yet in a rule-of-law state, speed must be balanced with procedural justice. Otherwise, AML enforcement may shift from financial system protection into mass suspicion. (Pol, 2018)

3.2. Critical Analysis of Dormant Account Blocking from the Perspective of Due Process of Law and Legal Certainty

The argument in this section is based on the view that the main problem in the practice of blocking or temporarily suspending transactions on dormant accounts in Indonesia does not lie merely in the existence of PPATK's authority, but in the institutional and procedural design that has not yet fully balanced law enforcement needs with the protection of constitutional rights. In the modern anti-money laundering regime, the state is indeed required to act quickly to prevent the transfer, concealment, or dissipation of assets suspected of originating from criminal acts. However, administrative speed cannot be used to justify reducing the standards of due process of law, legal certainty, and criminal proof.

3.2.1. Structural Problems in Blocking Dormant Accounts

The debate over PPATK's authority to request the temporary suspension of transactions on dormant accounts is inseparable from the transformation in the modern state's approach to managing financial risk. The state no longer works solely through punishment after a crime has been proven, but increasingly through preventive governance, namely, governance based on risk prevention before wrongdoing is fully established. This orientation is evident in the use of transaction patterns, anomaly indicators, risk profiling, and administrative classifications as the basis for preventive measures for certain accounts.

To a certain extent, this preventive orientation is necessary. Money laundering is cross-jurisdictional, fast-moving, and highly dependent on asset mobility. The state, therefore, needs instruments that can act before funds are moved or disguised further. However, problems arise when the logic of prevention is used to justify expanding administrative authority with limited supervision. Dormant accounts illustrate how an administrative category can gradually acquire a legally suspicious meaning. Accounts originally viewed as passive due to the absence of transactions may be placed under an intensive surveillance framework because they are considered vulnerable to abuse.

This condition reflects an epistemological shift in law enforcement practice. The state acts not only on proven violations but also on potential risks. Ericson & Haggerty (1997) describe this phenomenon as risk society governance, namely a form of governance that relies on risk categorization to control social populations. In the context of dormant accounts, administrative passivity may serve as a risk marker that triggers restrictions before there is individual evidence of involvement in criminal acts.

The problem is that the rule of law is not built on generalized suspicion. It requires a clear relationship between the restriction imposed and the legal justification behind it. Therefore, using dormant status as a basis for temporarily suspending transactions without more specific parameters may lead to overcriminalization by the administration. In such a situation, administrative law no longer

functions only as a tool for managing the financial system. However, it may become an instrument of social supervision that operates through probabilistic assumptions.

3.2.2. Due Process of Law Problems in the Temporary Suspension of Transactions Mechanism

The temporary suspension of transactions on dormant accounts is essentially part of the preventive mechanism in the anti-money laundering regime. In this system, PPATK serves as a financial intelligence institution that receives, analyzes, and conveys information regarding suspicious transactions to law enforcement agencies. This authority is important for maintaining the integrity of the financial system and preventing the movement or concealment of assets suspected of being linked to criminal acts. However, PPATK's function remains at the stage of analysis and early detection, not at the stage of criminal proof. Therefore, temporary suspension cannot be interpreted as a determination that an account is connected to a criminal act or that the account owner is guilty.

From the perspective of a democratic rule of law, every state action that restricts citizens' rights must be carried out through fair, transparent, and accountable procedures. In the practice of blocking dormant accounts, the mechanism is often *ex parte* and closed. Account holders may not receive prior notice regarding the reasons for the suspension and may only discover the account's status when they are unable to conduct a transaction. This situation shows the weakness of two basic elements of due process: proper notice and opportunity to be heard.

Galligan (1997) explains that fair administrative procedures require individuals to know the basis of state action and to have the opportunity to provide clarification. In the context of temporary transaction suspension, this principle has not been fully accommodated when financial intelligence effectiveness is prioritized, with procedural protection becoming secondary. This is particularly problematic because the presumption of innocence cannot be set aside. Everyone must be presumed innocent until a final and binding court decision is issued. This principle should guide not only trials, but also investigation and preventive measures in the context of money laundering.

The issue becomes more complex because money laundering is often proven through transaction patterns, fund flows, and the relationship between assets and predicate crimes. Law enforcement, therefore, needs preventive instruments to prevent assets from being moved or disguised. However, this need must not obscure the basic principle that the connection between an account and a criminal act must be established through a valid criminal-law mechanism. Dormant status itself is not an element of money laundering under Law Number 8 of 2010, and therefore cannot automatically be used to associate the account owner with criminal activity.

Temporary suspension must also be distinguished from the limited reverse proof mechanism under Articles 77 and 78 of Law Number 8 of 2010. These provisions allow the defendant to explain the origin of their assets, but only during court proceedings. They do not remove the prosecutor's burden to prove the elements of the crime. Therefore, it is inappropriate to treat a temporary suspension at the financial intelligence stage as requiring the account owner to prove non-involvement in a criminal act first. Such an approach risks shifting the presumption of innocence into a presumption of guilt.

In addition, temporary suspension raises questions about the boundary between financial intelligence and criminal law enforcement. In the criminal justice system, measures that limit a person's control over assets are generally implemented through confiscation mechanisms under criminal procedure law and judicial supervision. By contrast, PPATK's temporary suspension is an administrative preventive instrument designed to prevent assets from being moved before further examination. However, because its impact may resemble restrictions on the use of assets, its implementation must remain within the framework of rights protection. It must not become disguised punishment before a lawful criminal process takes place.

3.2.3. Legal Uncertainty in Relationships UU TPPU and POJK Nomor 24 Tahun 2025

The next problem lies in the disharmony between Law Number 8 of 2010 on Money Laundering and POJK Number 24 of 2025 on Account Management at Commercial Banks. These two legal regimes operate with different logics. The TPPU Law is oriented toward tracing assets derived from criminal acts, while POJK focuses on the administrative management of passive accounts.

In practice, the boundary between these regimes may become blurred. Dormant accounts, which were initially administrative categories, may gradually be treated as objects of criminal supervision. As a result, account holders do not have clear parameters for when a passive account is merely administratively inactive and when it becomes suspected of being connected to a criminal act.

This condition creates serious legal uncertainty. Gustav Radbruch places legal certainty as one of the fundamental purposes of law, alongside justice and utility (Borowski, 2024). Legal certainty requires rules that are clear, consistent, and predictable. In the context of dormant accounts, uncertainty arises not because PPATK lacks authority, but because the parameters governing its use are insufficiently clear. Fuller (1969) argues that law loses its internal morality when legal subjects can no longer understand rules. When administrative status can be converted into a criminal indicator without clear standards, citizens lose the ability to predict the legal consequences of their position.

Legal uncertainty also appears in the duration and follow-up of the temporary suspension. Although the law provides a normative time limit, in practice, an account may remain in a hanging position when administrative supervision continues without clear criminal follow-up. This creates legal limbo for account holders and weakens the legitimacy of state power. Thus, the problem of legal certainty in dormant account blocking is not merely technical but concerns the legitimacy of administrative authority in a criminal-law context.

3.2.4. Dignified Justice and Protection of Unproven Subjects

The Theory of Dignified Justice places every person as a legal subject whose dignity must be respected, including when their account is linked to alleged money laundering (Prasetyo & Kameo, 2024). This protection is realized through legality, the presumption of innocence, and the requirement of valid proof before a court. Therefore, temporary suspension of transactions on dormant accounts should not be interpreted as a determination of the account owner's guilt.

Although the state has a legitimate interest in preventing the transfer of assets suspected of originating from criminal activity, dormant status is primarily an administrative banking category, not an element of money laundering. Temporary suspension must therefore be based on objective and proportionate indicators, not solely on the fact that an account is inactive. Within the framework of Dignified Justice, PPATK's preventive actions must be distinguished from the criminal proof process (Jamalum Sinambela et al., 2024; Prasetyo & Kameo, 2024). Limited reverse proof under the TPPU Law applies only at the trial stage and cannot be used to impose a burden of proof on account owners at the administrative stage. Efforts to prevent money laundering must therefore continue to respect individual rights and the presumption of innocence until a final and binding court decision is issued.

Ultimately, the challenge of the anti-money laundering regime is not only how to pursue criminal proceeds, but also how to ensure that crime prevention does not legitimize the excessive expansion of administrative power. Due process of law, legal certainty, and Dignified Justice are essential so that law remains an instrument of human protection, not merely a tool of state risk management.

3.3. Discussion

The temporary suspension of transactions on dormant accounts cannot be treated as a mere technical banking measure. It lies at the intersection of financial intelligence, banking administration, and criminal law enforcement, especially in the context of money laundering. The core issue is not only whether PPATK has the authority to request a suspension, but also how that authority is applied to accounts that are administratively passive and may, in certain circumstances, carry criminal risk. Dormant status is not an element of money laundering; it is an administrative category based on the absence of transaction activity. Therefore, temporary suspension under the anti-money laundering

regime should be based on specific indicators linking an account to criminal proceeds, predicate offenses, or suspicious patterns of asset concealment.

This article does not assume that PPATK's measures are based solely on dormant status. Public information frames the policy as preventive, aimed at protecting passive accounts from misuse and encouraging verification. However, PPATK's internal criteria for distinguishing inactive accounts from accounts carrying criminal risk are not fully accessible. The juridical problem, therefore, lies in the need for clearer parameters separating administrative risk, reasonable suspicion, and criminal proof. POJK Number 24 of 2025 defines dormant accounts as accounts with no deposit, withdrawal, or balance inquiry activity for more than 1,800 days; thus, the normative basis is inactivity, not criminal suspicion.

Legally, PPATK's authority rests on Article 65 paragraph (1) of Law Number 8 of 2010, while Article 65 paragraph (2) requires the suspension to be recorded in an official report. This safeguard is important, but substantive legality still requires clear limits, procedures, and review mechanisms. Given the scale of PPATK's intervention, including the analysis of 122 million dormant accounts and the reactivation of more than 100 million accounts (PPATK, 2025), proportionality becomes crucial.

AML measures are necessary to *follow-the-money* and asset recovery, but they may also create excessive burdens if not balanced by due process (Stessens, 2000; Levi & Reuter, 2006; Pol, 2018). Asset recovery must not erase procedural safeguards, especially when freezing or restriction mechanisms create legal limbo (Ochnio, 2021; Yoserwan & Dias, 2024). Thus, dormant accounts may serve as risk markers, but not as automatic grounds for restriction. FATF's risk-based approach requires proportionality and sensitivity to financial exclusion (Force, 2013). PPATK's authority remains important, but it must be constrained by legality, proportionality, notice, written reasons, time limits, mechanisms for objection, and independent review.

Table 1. Normative Analysis of PPATK Authority over Dormant Accounts

Analytical Category	Actual Condition	Juridical Gap
Legal Basis	PPATK may request financial service providers to temporarily suspend suspicious transactions, while POJK No. 24/2025 classifies dormant accounts as an administrative banking status.	Dormant status may be wrongly treated as criminal suspicion in the absence of specific indicators.
Procedural Safeguards	A temporary suspension may occur during the financial intelligence stage if the account holder fails to provide	Weak notice, unclear reasons, and limited opportunity to clarify may

	sufficient information.	undermine due process.
Legal Remedies	Affected account holders often rely on bank verification or reactivation procedures.	The absence of clear and timely remedies may leave account holders in legal uncertainty.
Protection of Human Dignity	AML enforcement increasingly relies on risk-based analysis and preventive measures.	Account holders may be treated as suspects before criminal proof is established.

Ideally, evidence-based enforcement requires concrete indications of criminal involvement, while risk-based governance allows preventive action based on probability, anomalous patterns, and administrative classification. In the anti-money laundering regime, such an approach is not necessarily illegitimate, since proactive financial intelligence is needed to prevent the movement, concealment, or dissipation of assets suspected of being linked to criminal proceeds. Administrative efficiency may also justify initially categorizing dormant accounts as a risk group requiring verification.

However, risk-based logic must remain subject to clear legal limits. The main juridical concern lies in the weak differentiation between administrative risk and criminal indication. POJK Number 24 of 2025 treats dormant accounts as part of banking administrative governance, whereas temporary suspension under the AML regime should be based on more specific indications of money laundering, predicate crime, or suspicious transaction patterns. Without this distinction, passive accounts may be perceived as high risk solely because of their administrative status. From the perspective of Dignified Justice, preventive enforcement must remain humane: account holders should not be reduced to risk statistics before being proven guilty. Therefore, risk-based measures must remain bound by legality, proportionality, due process, and the presumption of innocence.

4. CONCLUSION

This study concludes, first, that the juridical implication of PPATK's authority over dormant accounts lies in extending financial intelligence measures into the preventive sphere of criminal law enforcement. Although PPATK does not directly block accounts, its request for a temporary suspension of transactions may affect the legal position of account holders when administrative dormancy is associated with criminal risk. Therefore, dormant status must not be treated as equivalent to criminal indication without specific, accountable, and individualized parameters.

Second, the current mechanism has not fully met the standards of due process of law and legal certainty. Its main weaknesses include limited notification, unclear mechanisms for objections, insufficient independent review, and the blurred distinction between administrative risk and criminal suspicion. These weaknesses may create a presumption of suspicion before criminal proof is established in court.

Several reforms are therefore necessary. Presidential Regulation No. 50 of 2011 should require proper notice, written reasons, and the right to be heard, except where prior notice would obstruct investigation. An independent review panel should assess PPATK's suspension requests, especially in large-scale measures. The TPPU Law should clarify the distinction between dormant and suspicious accounts. Finally, temporary suspension should be subject to strict time limits and automatic post-suspension judicial review to ensure effective, proportionate, and dignified AML enforcement.

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