

# Jurnal Notariil

Jurnal Notariil, Vol. 8, No. 2, 2023; 73-81

Available Online at <https://ejournal.warmadewa.ac.id/index.php/notariil>

P ISSN 2540 - 797X

E ISSN 2615 - 1545

## VALIDITY OF AUTHENTIC DEED MADE BY NOTARY IN SUSPECT STATUS

I Putu Adi Tanaya

Magister of Notary, Universitas Warmadewa, Denpasar-Indonesia

Email:nputuadi269@gmail.com

How To Cite:

Tanaya, I, P, A. (2023). Validity of Authentic Deed Made by Notary in Suspect Status. *Jurnal Notariil*, 8 (2), 73-81,

Doi: <https://doi.org/10.22225/jn.8.2.2023.73-81>

### Abstract

The Notary in making an authentic deed as a general official applies to that, even though he is not involved in the forgery that occurs in the authentic deed, the Notary can be summoned by the Indonesian National Police as a witness. then it turns out that sufficient original evidence is found for the involvement of the Notary, then it is possible that the Notary can be made a suspect. As long as the Notary is in the status of a suspect, how is the legal protection for a Notary suspected of committing a criminal act? how is the validity of the deed made by a notary in the status of a suspect? The purpose of this study is to find out how is the protection of a notary who is suspected of committing a criminal act and the validity of an authentic deed made by a notary who is currently in the status of a suspect. This study uses a normative juridical method. In accordance with the applicable law, legal protection for a Notary is in the right of notarizing a Notary and also the procedure for summoning a Notary. A notary is in suspect status if he continues to make a deed because of the absence of a notary in making a deed, he is in the status of not being dismissed, suspended (suspended), fired and retired. Notary as after the suspect is not necessarily guilty and the principle of presumption of innocence must be upheld, until a court decision has definite legal force. It depends on the community still willing to use the services of a notary who is in the status of a suspect or not.

**Keywords:** authentic deed; notary; suspect status; validity

### 1. INTRODUCTION

The Notary Position was established in the government of the Dutch East Indies and was regulated in the Reglement op Het Notaris Ambt in Indonesie (Staatsblad 1860 No.3). The Government of Indonesia then published Law No. 30 of 2004 on The Regulation of Notary Positions enacted in Jakarta on October 6, 2004 (LNRI Year 2004 Number 117) consisting of 13 Chapters and 92 Articles as rules governing the position of Notary Public in Indonesia. Furthermore, the Law was amended by Law No. 2 of 2014 concerning

Amendments to Law No. 30 of 2004 concerning Regulation of Notarial Positions (LNRI of 2014 Number [3.TLN](#) No. 5491) hereinafter referred to as UUJNP.

Notary public official as referred to in Article 1 number 1 UUJNP is a place for a person to be able to obtain advice, authentic deed regarding all legal acts. Everything written and determined is true, Notary public officials are authorized to make authentic deed and have other authority as referred to in UUJNP. (Zul Fadil, 2020) Notary as public officials, as well as a profession, have a very important position in helping to create legal certainty

for the community.

Since the enactment of the UUJN, supervision of Notaries In accordance with the substance of Article 66 paragraph (1) of the UUJNP, it can be said that the word approval means that in the absence of approval, this cannot be done before a decision from the Notary Honorary Council is made and if the Notary Honorary Council in not later than 30 (days) from the receipt of the letter of request for approval from the Notary Honorary Council does not provide an answer, the Notary Honorary Council is deemed to have accepted the request. MKN has a very important role for the implementation of quality and proportional supervision that ensures legal certainty, legal protection and legal order for Notaries and the public in general.

Notary public in making an authentic deed must be held accountable for the deed if it turns out that in the future there is a problem of the authentic deed both in terms of criminal law, civil and state administration. If there is an error derived from the Notary itself then it is seen first whether negligence or intentionality, where if it causes losses then the party suffer can sue civilly or criminally.

The articles of criminal acts that often appear in the implementation of notary duties are Article 263 of the Criminal Code Jo Article 264ayat (1) of the Criminal Code on Forgery of Letters. In article 263 of the Criminal Code there are two kinds of forgery of letters, namely: (Waluyo, 2005)

Making a false letter (*valscheelijkop maakt*) is the act of making a letter which contents are not proper or the contents are not true. In this case a letter is made that the contents are not true but the letter itself is original or often called *fake-ori* (original but fake) because nothing is changed, added or reduced.

Falsifying letters (*vervalscht*) is falsifying letters by changing, adding, subtracting or deleting some of the writings in a letter. So the letter already exists but the letter is then changed so

that the sound and meaning is different from the original.

Notary public even if he is not involved in falsifying information in the authentic deed he made may be summoned by the investigators of the State Police of the Republic of Indonesia (hereinafter referred to as The National Police) in its capacity as a witness. (PAF Lamintang, 1991) If during investigation of the police there turned out to be sufficient preliminary evidence for the involvement of notary public, then it is possible that the Notary can be a suspect. What is the legal protection of Notary Public who is suspected of committing criminal acts and as long as the Notary is in the status of a suspect what is the validity of the notarial authentic deed?

The purpose of this research is to find out how the protection of Notary Public and the validity of authentic deed made by a Notary who is in the status as a suspect in a case. The theoretical benefits of this research is as an effort to develop scientific insights, especially the development of legal science theory and provide benefits in the development of reading for legal education to readers. The practical benefit of this research is to be used as a guideline in the selection of Notary Public for the creation of authentic deed needed.

## **2. METHOD**

The research method used is normative juridical, which is research based on laws and regulations or legal norms that are binding that have relevance to the material discussed. The approach used in this thesis research is statute approach and conceptual approach. Statute approach is an approach that is based on the prevailing laws and regulations and related to the issues discussed. Conceptual approach is an approach based on the opinions of scholars who understand the problem being discussed.

The legal materials used in this writing are primary legal materials and secondary legal materials. Primary legal material is a binding legal material consisting of

applicable laws and regulations that support research, while secondary legal material is legal material in the form of literature books, scientific records, scientific works and various applicable print media and has to do with the issues being discussed.

The technique used to collect legal materials is a way of literature research, namely through literature research in the form of determining secondary data sources, identification of secondary data by citation or recording and then analyzing legal materials obtained to determine their relevance to the needs and formulation of problems.

The theories used are The Theory of Legal Protection and Theory of Legal Certainty. Legal protection is a protection given to the subject of law, namely a person or legal entity either prefensive or repressive, both oral and written. The theory of legal protection contributes to the notary to protect his position who is obligated to keep everything secret about the deed he made in accordance with his oath and promise, which is in accordance with article 66 paragraph (1) UUJNP. Legal certainty is a guarantee that the law is exercised, that the righteous according to the law can obtain his rights and that law verdict can be carried out. Legal decisions in the sense of legislation and a regulation after being enacted then implemented with certainty by the government. Legal certainty means that everyone can demand that the law be enforced and that the claim be met and that violations of the law will be acted upon and penalized as well. (Frans M Suseno, 1988) The importance of the theory of legal certainty in the making of authentic deed by notary public must guarantee legalpatian for the parties who commit legal acts which put forward the agreement in the deed binding on both parties and apply as law between them.

### **3. DISCUSSION**

#### ***Legal protection for notaries who are suspected of committing criminal acts***

The role of notary public is required in Indonesia because it is motivated by Article 1866 of the Civil Code which states the evidence consists of (Soesanto, 1982):

1. Proof of writing
2. Witnesses Evidence
3. Conjecences
4. Recognition
5. Sworn Statement

The highest proof is written evidence, and this written evidence can be either an authentic deed or a deed under hand. Authentic deed has a more important meaning than as a means of evidence, in case of dispute then the authentic deed can be used as a guideline for the parties to the dispute. Therefore, the state provides institutions that can make authentic deed, where the state delegates the task to the notary as stated in Article 1868 of the Civil Code jo S. 1860/3 concerning the existence of Public Officials, namely officials appointed by the state to assist the public in the creation of authentic deed.

The official in question is a Notary Public and the emblem used as a stamp by a notary public is the national emblem. Notaries are the only private people allowed to use the emblem. Notary is a public official, this can also be seen in Article 1 number 1 UUJNP. (Tan, 2000)

Notary as public officials are authorized to make authentic deed of all acts, agreements, and provisions required by the laws and/or desired by the interested to be stated in the authentic deed, guarantee the certainty of the date of making the deed, keep the deed grosse, copies and quotations of the deed, all of it as long as the making of the deed is not also assigned or excluded to other officials or other persons established by law. (Kohar, 1983)

Notary as public officials who are authorized to make authentic deed, have an important role in people's lives. Many sectors of business transaction life of the community require the participation of notary public, even some provisions that require the use of Notarial Deed which means that if not made by Notarial Deed, then the transaction or activity has no legal force. To improve the professionalism of the Notary Public, the presence of UJNP to give obligations and authority to the Minister of Law and Human Rights which is forwarded to the Notary Supervisory Assembly to conduct coaching and supervision of notary public in carrying out its work, is a positive step, so that finally community activities related to notary public run harmoniously.

UJNP stipulates that when a Notary public in carrying out his or her duties is proven to commit violations, then the Notary may be subject to or sanctioned in the form of civil, administrative, and Notary Department Code of Conduct. In practice it is found that a legal action or violation committed by a Notary Public may actually be subject to administrative or civil sanctions or the Code of Ethics of the Notary Department, but then withdrawn or qualified as a criminal act committed by a Notary Public. The qualification relates to aspects such as: (Adjie, 2008)

- a. The certainty of the day, date, month, year, and time facing.
- b. Parties (anyone) who face notary public.
- c. Signature of the parties.
- d. The copy of the deed is not in accordance with the original deed.
- e. A copy of the deed exists, without the creation of a original deed.
- f. Original deed is not signed in full, but a copy of the deed is issued.

These aspects if proven to be violated by a notary public, then the notary concerned can be sentenced to civil or administrative sanctions. (Habib Adjie,

2008) On the other hand such restrictions are taken or resolved criminally or used as a basis to criminalize notaries on the basis of notary public has made a false letter. The formal aspects of notarial deed may be used as a basis or limitation to criminalize Notary Public, as long as it is proven that the deed is intentionally made before and by the Notary is used as a tool to commit a criminal act against the making of an authentic deed or voluntary deed. Notary public also knowingly, deliberately to joint with the parties concerned to do or assist or instruct the parties to take a legal action that he knows as an unlawful act.

Thus the criminalization of Notary Public can be done with restrictions, if (Poernomo, 1986):

1. There is legal action from the notary against the formal aspects of the deed that is deliberate, aware and insodic and planned, that the deed made before the Notary or by the Notary together (agreed) to be the basis for committing a criminal act.

2. There is legal action from notary public in making a deed before or by a Notary Public which if measured under UJNP is not in accordance with UJNP.

3. The notary action is not appropriate according to the authorized institution to assess the actions of a Notary Public, in this case the Notary Supervisory Panel.

Furthermore, there are 2 (two) types of misappropriation commonly done by notaries in the making of deed, namely (Poernomo, 1986):

1. Procedural Misconduct

In the procedure of making a notarial deed, notary is required to check the identity of the face such as Identity Card (KTP) or Driver's License (SIM), and a valid Family Card (KK). For foreign nationals in exchange for identity cards such as ID cards and driver's licenses, the parties can request a Passport. In the event that the fulfillment of the procedure may occur irregularities, as although it is

---

known that the identity is not in accordance with the party but the notarial deed is still made by the notary concerned.

2. Criminal Misappropriation

a. Falsification of Deed

In this case where a notary is involved with the desire of the parties to give unilateral advantage to the parties. Notary cooperates with the parties in terms of making a deed. Forgery of this deed can be a forgery of signatures by the parties known by the notary concerned.

b. Falsification of Information

Before making a deed, the notary also first asks for the information of the parties to be included by the notary into the deed. In the case of taking information from the notary, the parties can also be involved in the falsification of this information. Notary then cooperates with the parties in the event of using the false information to be made into an authentic deed.

The Criminal Code, namely in article 1 point 14 mentioned that the suspect is a person who because of his actions or circumstances, based on preliminary evidence should be suspected as the perpetrator of a criminal act. To be said as a suspect according to the provisions of Article 1 Number 14 Criminal Code it must be able to meet the elements specified as follows: (Raharjo, 1986) a. Which is because of his deeds, and b. With that must be supported by preliminary evidence.

What is meant by a suspect who because of his actions is an act that is contrary to the rule of law, including should also be interpreted as the person who is contrary to the circumstances that should be, for example prohibited to steal, here the prohibited act is to steal, then everyone who steals it can be said as a suspect (Hartono, 2010).

Meanwhile, the meaning of preliminary evidence can be found in the Police Regulation No. Pol. Skep/1205/IX/2000 concerning The Administrative Guidelines for Criminal Investigation,

which states that sufficient preliminary evidence is minimal police reports coupled with one tool of evidence. Which means to make a person as a suspect is not enough just with a report to the police, there must also be at least one tool of valid evidence according to Criminal Code. Regarding the valid evidence is stipulated in Article 184 kuhap paragraph (1) which states that the valid evidence is Witness Testimony, Expert Information, Letters, Instructions and Description of the Accused.

Notary position in the development process is needed by the community, therefore notary services need to be regulated in order to obtain protection in order to achieve legal certainty. This is in accordance with what is mentioned in the point of considerant weighing letter c UUJNP which states that Notary is a certain position that carries out the profession in legal services to the public needs to get protection and guarantees, in order to achieve legal certainty. (Putri, 2011) Legal Protection for Notaries is regulated in several articles in the Law, namely:

The Right of Notary To Refuse in Article 4 paragraph (2) in paragraph 4, Article 16 paragraph (1) letter f UUJNP, Article 54 UUJNP, and Article 322 paragraph (1) penal code. Based on these provisions, not only is not entitled not to speak, but it is obligatory not to speak. The obligation not to speak is not based on article 1909 paragraph (3) of the Civil Code, which only gives the right not to speak, by demanding the right of disassociation of a Notary Public, but based on the oath of office (article 16 paragraph (1) and article 54 UUJNP). The obligation to keep the contents of the deed confidential, as expressly stipulated in the articles, overrides the general obligation to bear the testimony referred to in article 1909 paragraph (3) of the Civil Code. The right of refusal given by the Law is not only a right, but an obligation, so the Notary is obliged not to speak, even in front of the court. Although the Notary is given consent to speak by his clients, he can still exercise his right of disapproving,

because the obligation to keep secret is not placed to the Notary by the clients but by law.

Procedure for Notary Summons by Public Prosecutor Investigators, or Judges Legal protection of Notary Public as witnesses, suspects and defendants under UUJNP is specifically stipulated in Article 66 (paragraph 1). The article expressly states that for the purposes of the judicial process, investigators, public prosecutors, or judges who require a photocopy of the minutes of the deed or documents that are placed on the Minutes of Deed or Notary Protocol in the Notary's Depository must obtain prior approval from the Notary Honorary Council. and if the Notary Honorary Council within a maximum period of 30 (days) working as of the receipt of the request letter for approval, the Notary Honorary Council does not provide an answer, the Notary Honorary Council is deemed to have accepted the request. Furthermore, if the Investigator, Public Prosecutor, or Judge will summon a Notary to attend the examination related to the deed he made or the Notary protocol that is in the Notary's custody, the Investigator, Public Prosecutor, or Judge must also obtain approval from the MKN. MKN which has the authority to give approval at the request of Investigators, Public Prosecutors or Judges in terms of taking minutes and/or summoning a Notary, then the mechanism or implementation of Article 66 (paragraph 1) UUJNP must be carried out honestly, fairly, transparently, ethically and in accordance with the provisions current regulation.

Notary public also has legal protection, namely the understanding of law enforcement officials on the duties and authorities of notaries as well as the understanding of legal officials to understand and understand the rules contained in the UUJNP, where notarial deed is made based on the wishes of the parties as the strongest and fullest written evidence, what is stated in the notarial deed must be accepted, unless the interested party can prove the opposite

with the decision of a court with permanent legal force that states otherwise.

### ***Validity of Deed Made By Notary In Suspect Status.***

Notary public officials are authorized to make authentic deed of all acts, agreements and provisions required by the laws and/or desired by the person authorized to be stated in the authentic deed, guarantee the certainty of the date of making the deed, keep the deed grosse, copies and quotations of the deed, all of it as long as the making of the deed is not also assigned or excluded to other officials or other persons established by law.

The definition of authentic deed can be found in Article 1868 of the Civil Code which states:

"An authentic deed is a deed in the form prescribed by the law made by or in the presence of a powerful officer/public servant for that place where the deed is made".

A deed is said to be authentic if it meets the following requirements: (Adjie, 2008)

A deed made by or a deed made before a public servant appointed by law.

The form of deed is determined by the law and how to make a deed according to the provisions stipulated by the law.

The place where the authorized official makes the deed

Notarial Deed as an authentic deed has the power of evidentiary value: (Adjie, 2008)

Outward

The outward ability of a Notarial deed is the ability of the deed itself to prove its validity as an authentic deed. If viewed from the outside (birth) as an authentic deed and in accordance with the rule of law that has been determined about the terms of the authentic deed, then the deed is valid as an authentic deed, until it is proven otherwise, meaning until someone proves that the deed is not an

outwardly authentic deed. The burden of proof in this case is on the party that denies the authenticity of the Notarial deed.

#### Formal

Notarial Deed must provide certainty that an event and the fact in the deed is actually done by a Notary Public or explained by the parties facing at the time stated in the deed in accordance with the procedures specified in the making of the deed. Formally to prove the truth and certainty about the day, date, month, year, time of the face, and the parties facing, paraph and signatures of the parties or confronters, witnesses and Notaries, as well as prove what is seen, witnessed, heard by the Notary (on the deed of official or news event), and record the statements or statements of the parties or the face (on the deed of the parties).

#### Materil

Information or statements that are contained or contained in the official deed (or news of the event), or information of the parties given or submitted before the Notary public and the parties must be assessed correctly. If it turns out that the statements or statements of the confronters are incorrect, then it is the responsibility of the parties themselves. Notary regardless of such a thing.

Notary as public officials who are trusted with their deed can be a powerful tool of evidence in case of legal disputes in court. A notary must uphold the dignity and dignity of his profession as a position of trust and carry out his duties appropriately and honestly, which means to act according to the truth in accordance with the oath of office of a Notary Public. Notary is also a human being who does not escape from mistakes either intentionally or because of his negligence. No notary is immune from the law. Deviations against the authority and obligations of the notary, allow the notary to deal with legal liability.

Associated with the Theory of Legal

certainty, certainty according to the General Dictionary of The Indonesian Language, explains the certainty comes from the word *pasti* which means of course, it is fixed, should not be not, so certainty means provisions, provisions. Law means rules, all laws, provisions and decisions. (Poewadarmainta, 2007)

As a value, legal certainty is not solely related to the State, because the essence of legal certainty is a matter of protection from arbitrariness, therefore, actors who may commit arbitrariness are not limited to the State alone, but also by a group of other parties outside the country. (Manulang, 2007) Certainty is an inseparable feature of the law, especially for written legal norms. Laws without the value of certainty will lose meaning because it can no longer be used as a guideline for everyone. Certainty contains several meanings, namely: (Frans M Wantu, 2011) A. the existence of clarity, B. does not cause multi-interpretation, C. does not cause contradictions, D. can be implemented. The law must be strictly applied in society, containing openness, so that anyone can understand the meaning of a provision of law. The laws of one another must not be contradictory, so as not to be a source of doubt.

According to Sudigno Mertokusumo, legal certainty is a guarantee that the law is carried out, that the right according to the law can obtain its rights and that the verdict can be carried out. Legal decisions in the sense of legislation and a regulation after being negotiated and implemented with certainty by the government. Certainty according to Sudikno Mertokusumo, is one of the conditions that must be met in law enforcement. Sudino Mertokusumo defines legal certainty as "judicial protection against arbitrary actions, meaning that one will be able to obtain something expected under certain circumstances". (Mertokusumo, 2010)

Notary public who become suspects in a criminal case, who legally do not have a permanent legal force (*inkracht*) is considered incapable of making a deed will

cause an unearthing effect in the community to the notary profession itself. Although no court ruling has yet been, a notary in suspect status should temporarily be unauthorized to make a deed. This is to facilitate the judicial process and also as a form of protection for the notary client in particular and the public at large. (Mertokusumo, 2010)

Notary who is in the status of a suspect, is still allowed to make a deed, because a person who is new to the suspect is not necessarily guilty and we must also uphold the principle of Presumption of Innocence which is the principle of assuming the innocence and the principle of valid presumption of deed made by the notary. Prior to the permanent verdict of a notary trial is not guilty and the notary status is still an active notary and the deed he made still has a valid legal force against the parties mentioned in the deed. A notary has no authority in the case of making a deed if the notary is in the status of suspended, fired or retired. (Sudigno Mertokusumo, 2010)

Regarding the authority of a Notary public whose status as a suspect is not regulated. In UUJNP the circumstances in which a Notary Public is not authorized to make an authentic deed, namely: (Asikin, 2012)

a. Before the Notary notary takes the oath/appointment of notary public (Article 7 uu jnp).

b. As long as the Notary is temporarily suspended.

c. During Notary Leave.

d. Based on the provisions of Article 40 paragraph (2) letter e concerning witnesses jo Article 52 paragraph (1) UUJNP.

A Notary public as a suspect does not prevent the Notary from making a deed unless there is a decree of the minister to dismiss it. So a notary is still authorized to make a deed if not on leave and not dismissed as a Notary Public.

#### **4. CONCLUSION**

The form of legal protection against Notary Public called to be examined in the investigation process according to UUJNP namely The Right to Refuse by Notary which is also an obligation of notary public in relation to article 16 paragraph (1) letter f UUJNP where notary is obliged to keep the confidentiality all the contents of the deed and all information obtained in the making of the deed in accordance with the oath and promise of his office. Furthermore, there is a procedure of notarized summons stipulated in Article 66 paragraph (1) uu jnp that is obliged to seek approval from MKN, where the provisions of Article 66 paragraph (1) UUJNP put aside provisions on the procedure of summoning suspects or defendants according to kuhap in accordance with the principle of *lex specialis derogate legi generali*. The provisions of Article 66 paragraph (1) of the UUJNP aim to protect the Notary public from his position which is obligated to keep the confidentiality regarding everything about the deed he makes and all information obtained in order to make the deed in accordance with the oath or promise of his office, as well as the understanding of law enforcement officials regarding the duties and authorities of notary public and the rules contained in the UUJNP.

Notary public in suspect status remains authorized to make a deed. In UUJNP, the notary's authority in making a deed if he is in a status of not yet sworn, on leave, temporarily dismissed (suspended), fired and retired. Notary as a suspect is not necessarily guilty and must uphold the principle of presumption of innocence. Guilty or innocence can only be determined after a court ruling has a definite legal force. Depending on the community themselves still wanting to use the services of notary public who are in the status as suspects or not.

#### **REFERENCES**

Asikin, Z. (2012). *Pengantar Ilmu Hukum*, Jakarta; Rajagrafindo Persada.



- Adjie, H. (2008). *Sanksi Perdata dan Administratif Terhadap Notaris Sebagai Pejabat Publik*. Bandung: Refika Aditama.
- Fadil, Z. (2020). *Hukum Akta Notaris*. Surakarta: Lingkar Kenotariatan.
- Hartono. (2010). *Penyidikan & Penegakan Hukum Pidana Melalui Pendekatan Hukum Progresif*. Jakarta: Sinar Grafika.
- Kohar, A. (1983). *Notaris Dalam Praktek Hukum*. Bandung: Alumni.
- Mertokusumo, S. (2010). *Mengenal Hukum Sebuah Pengantar*. Bandung: PT.Bina Cipta
- Lamintang, P. A. F. (1991). *Delik-delik Khusus (Kejahatan-kejahatan Membahayakan Kepercayaan Umum Terhadap Surat-surat, Alat-alat Pembayaran, Alat-alat Bukti dan Peradilan)*. Bandung: Mandar Maju
- Law Number 30 of 2004 concerning Regulations for Notary Position, State Gazette of the Republic of Indonesia of 2004 Number 117.
- Law Number 2 of 2014 concerning Amendments to Law Number 30 of 2004 concerning Regulations for Notary Positions, State Gazette of the Republic of Indonesia of 2014 Number 3
- Poernomo, B. (1986). *Pokok-Pokok Tata Acara Peradilan Pidana Indonesia Dalam Undang-Undang R.I. No. 8 Tahun 1981*. Yogyakarta: Liberty.
- Poewadarmainta, W. J. S. (2007). *Kamus Besar bahasa Indonesia*. Jakarta: PT. Balai Pustaka
- Putri, A. R. (2011). *Perlindungan Hukum Terhadap Notaris*. Jakarta: Softmedia.
- Rahardjo, S. (1986). *Ilmu Hukum*, Bandung:.
- Soesanto, R, (1982). *Tugas, Kewajiban dan Hak-hak Notaris, Wakil Notaris*. Jakarta: Pradnya Paramita.
- Santosa, W. (2005). *Propesi Notaris Dan Pejabat Pembuat Akta Tanah*. Jakarta: Harapan.
- Siregar, B. (2013). *Kitab Undang-Undang Hukum Perdata Terjemahan*. Jakarta: Sinar grafika.
- Tan, T. K. (2000). *Buku I Studi Notariat – Beberapa Mata Pelajaran dan Serba Serbi Praktek Notaris*. Jakarta: Ichiar Baru Van Hoeve.
- The 1945 Constitution of the Republic of Indonesia.
- Wantu, F. M. (2011). *Idee Des Racht Kepastian Hukum, Keadilan, dan kemanfaatan Implementasi Dalam Proses Perdata*. Yogyakarta: Pusaka Pelajar.