

The Strength of Notarial Deed Made by Notary Employee on Behalf of Notary Sentenced to More than 5 Years of Imprisonment

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ABSTRACT

Objective: This article discusses the strength of deeds made by notary employees on behalf of Notary after being sentenced to more than 5 years in prison. **Method:** This research uses normative juridical method with statute approach. **Results:** The result of the research is that Notary who is sentenced to imprisonment of 5 years or more will be dishonorably discharged by the Minister. Which means that the Notary no longer has the authority as a Notary. Therefore, the legal force of a deed made by a notary employee on behalf of a Notary who has been sentenced to imprisonment for more than 5 years and has lost his authority is considered invalid, has no legal force and is considered a deed forgery. If a notary employee acts outside of his/her authority, the authentic deed he/she produces will not be legally binding and cannot be executed. Parties harmed by such actions can file a civil lawsuit against the notary at the District Court. **Novelty:** This article highlights the legal consequences and invalidity of deeds made by notary employees on behalf of a Notary who has lost his authority due to imprisonment exceeding 5 years, emphasizing the legal boundaries of notary authority and accountability within Indonesian law.

INTRODUCTION

A Notary is a public official who has the authority to create authentic deeds and other agreements in accordance with the Law on the Office of Notary [1]. In addition to making authentic deeds, registering or recording deeds, and signing deeds, the other functions of a Notary include providing information in the preparation of authentic deeds and acting as a legal advisor [2]. In making deeds, a Notary is required to remain impartial to all parties involved. Such impartiality must be ensured by the absence of coercion from any party participating in the deed-making process.

A notarial deed is an official document that plays an important role in social and legal life. In various agreements and transactions, it provides legal certainty and protection in the event of disputes [3]. According to Article 1870 of the Indonesian Civil Code, an authentic deed serves as perfect and binding evidence, meaning that the truth of the contents stated in the document is considered complete and binding for all parties listed therein.

As a public official, a Notary must be able to meet the needs of society while complying with laws and ethical standards, both in terms of quality and conduct [4]. This quality can be observed from the results of the deeds they produce. A Notary must act professionally and responsibly to ensure public trust; therefore, a notarial code of ethics is necessary. In carrying out their duties, Notaries are obliged to adhere to the code of ethics as well as the applicable legal provisions [5].

Violations of the code of ethics can affect the reputation of the Notary profession. According to Article 13 of Law No. 2 of 2014 on the Position of Notary, violations that may result in dishonorable discharge occur when a Notary commits a criminal act punishable by more than five years of imprisonment [6]. Criminal sanctions of more than five years usually arise from serious crimes such as fraud, corruption, embezzlement, and other criminal acts that may harm the public [7].

In one of the regencies in East Java, there was a Notary who had been sentenced to imprisonment for more than five years. In the process of preparing deeds, the documents were not drafted directly by the Notary but by employees acting on behalf of the Notary. This situation significantly affects the validity of the deeds produced, considering that a notarial deed serves as legal evidence in legal transactions. When the Notary involved has been convicted of a criminal offense, doubts arise regarding the validity and reliability of the deeds made by the Notary's employees. This is due to the potential for violations or irregularities during the deed-making process, which may affect the legal validity of the document. This creates legal implications that must be considered, particularly regarding the validity of the deed as legal evidence [8].

A study written by Gina Sakina Putri and Widodo Suryandono in 2018 titled "Legal Consequences for a Notary Who Has Been Convicted with Permanent Legal Force but Continues to Carry Out His Duties (Case Study of Supreme Court Decision No. 1175 K/PID/2016)" shows that after the issuance of the Decree, the Notary no longer has the authority to make deeds. If they continue to do so, the deeds created are considered false deeds [9].

Another previous study written by Franky Roberto Gomies in 2020, titled "Notary in Convict Status Who Still Carries Out His Duties," shows that a Notary who, by law, no longer has authority but continues to practice and serve the public acts without legal authority; therefore, the deeds created have no validity as authentic deeds [10].

From the two existing studies, there has been no adequate explanation regarding the legal validity of deeds made by a notary's employee on behalf of a Notary who has been sentenced to imprisonment for more than five years. Therefore, this research focuses on analyzing the legal strength of deeds prepared by notary employees under such circumstances. This study aims to clarify and understand the legal implications of these deeds in the context of a Notary who has lost their authority. This is important because there are still Notaries involved in fraudulent deed-making, which can harm members of the public who have entrusted them with preparing their deeds. This research is expected to provide clarification regarding the validity of deeds within the legal framework and help protect public interests.

Based on the background explained above, it is crucial to understand the legal strength of deeds prepared by a notary's employee, especially when the Notary has been sentenced to imprisonment for more than five years. This is because such imprisonment may affect the integrity and validity of the deeds issued. Therefore, it is essential to ensure that the deeds remain legally valid and unaffected by the Notary's legal status. This is due to potential doubts regarding the authenticity of deeds prepared in such situations,

which may impact legal certainty and protection for the involved parties. When a Notary faces imprisonment, the integrity and credibility of the deeds they issue may be questioned, making it important to ensure that the deeds remain valid and do not harm those who rely on them.

Understanding this aspect helps guarantee the validity and reliability of deeds and protects the interests of the public who depend on notarial deeds. Therefore, considering the existing issues, the researcher intends to examine the legal strength of deeds made by notary employees under the title "The Strength of Notarial Deeds Made by Notary Employees on Behalf of a Notary Sentenced to More Than Five Years Imprisonment." The main issue to be examined is: how is the legal strength of deeds made by notary employees on behalf of a Notary after being sentenced to imprisonment for more than five years?

RESEARCH METHOD

This research employs a normative juridical method using a statute approach. The data for this study are obtained from primary legal materials, which focus on Law of the Republic of Indonesia Number 2 of 2014 concerning the Position of Notary and the Regulation of the Minister of Law and Human Rights of the Republic of Indonesia Number 19 of 2019 concerning the Requirements and Procedures for Appointment, Leave, Transfer, Dismissal, and Extension of Notary Tenure. Meanwhile, the secondary legal materials consist of journals, books, and scientific articles.

RESULTS AND DISCUSSION

A. The Authority of Notaries Based on Statutory Regulations

According to Article 1, Paragraph 1 of the Notary Position Act, a Notary is defined as a public official who has the authority to draw up authentic deeds, as well as other authorities as stipulated in Article 15 of the Notary Position Act and other related laws. This authority encompasses various duties and responsibilities that must be adhered to in order to ensure the validity and legal force of the deeds they produce. By performing these duties properly, a deed can be legally recognized and possess binding legal effect. There are eleven (11) authorities of a Notary as stated in the Notary Position Act, namely:

1. To draw up deeds

An authentic deed is a deed drawn up before a Notary. Such a deed is prepared and legalized by the Notary as an authorized public official, thereby possessing full legal force and being recognized as valid under the law, as long as its creation complies with the provisions set forth in Articles 1868 and 1870 of the Civil Code (KUHPerdota), ensuring its authenticity beyond doubt.

Article 1868 of the Civil Code stipulates:

"An authentic deed is a deed drawn up in the form prescribed by law, by or before a competent public official in the place where the deed is made."

Article 1870 of the Civil Code states:

"For the parties concerned, their heirs, or those deriving rights from them, an authentic deed provides perfect proof of what is contained therein."

With the assurance of legal certainty as a written instrument of perfect evidence, an authentic deed holds binding legal power. This is because an authentic deed has the same standing as a final and binding court decision. Authentic written evidence serves the interests of the parties involved, third parties, and the State in upholding the law, facilitating the resolution of civil disputes through legal certainty and the assurance of the deed's validity [11].

2. To guarantee the certainty of the date of the deed

This involves ensuring the authenticity and accuracy of the date stated in the deed. The date reflects the time the deed was made and is a crucial element in determining when the document becomes valid and enforceable.

3. To store deeds

This refers to keeping the original deed, known as the *"minuta akta"*, in a secure place to ensure its preservation and prevent damage. The *"minuta akta"* contains the title of the deed, the place of execution, the parties involved, the substance of the deed, and its closing statement.

4. To issue grosse copies

This involves issuing an official copy of a deed of acknowledgment of debt, prepared by the Notary, to the rightful recipient.

5. To issue copies and excerpts of deeds

A copy *"salinan akta"* is a full reproduction of the deed, signed by the Notary, and given to the involved parties as official evidence of the deed's validity. An excerpt *"kutipan akta"* contains only the relevant portions of the deed.

6. To legalize private deeds

Private deeds that have been completed are signed and legalized by the Notary. The Notary certifies the authenticity by confirming that the parties whose names appear in the deed are indeed those who signed it, and that the date of legalization stated in the deed is accurate.

7. To register private deeds that have been perfected *"Waarmeking"*

This refers to private deeds that have been completed and signed by the parties without the presence of a Notary.

8. To make copies of original private documents

This involves reproducing the entire contents of a private document without altering any part of it.

9. To certify the conformity of photocopies

This entails certifying that a photocopy matches its original document, followed by stamping and signing it.

10. To provide legal counseling

This involves offering legal education to the public in accordance with applicable laws, aiming to enhance public legal awareness and adherence to the Notarial Code of Ethics [12].

According to Article 15 of the Notary Position Act, a Notary possesses various authorities regulated by statutory provisions. These include certifying electronic transactions, drawing up deeds for cooperatives, limited liability companies, foundations, land deeds, and waqf declarations. A Notary also exercises the State's authority in civil law matters, particularly in relation to the creation of authentic deeds. This authority encompasses the responsibility to draft, legalize, and safeguard deeds to ensure their legal validity.

By fulfilling these responsibilities properly, the deeds drawn up by a Notary are recognized as valid and possess binding legal force. In carrying out their duties, Notaries are expected to uphold high moral standards, apply their expertise effectively, and work with precision and care. This is crucial to guarantee the authenticity and legal strength of all deeds created. Additionally, Notaries must act with honesty and impartiality in all actions. They are strictly supervised by oversight bodies to ensure that all parties involved are protected and that their rights are safeguarded. Such supervision is intended to maintain the integrity and compliance of Notaries with prevailing regulations.

B. Administrative Sanctions Against Notaries

A Notary has been granted authority by law to serve the public in need of legal evidence for dispute resolution purposes. Therefore, a Notary is obliged to uphold honor and dignity and comply with the laws that have been established. If a Notary commits a disgraceful act by violating these laws and behaves in a way that degrades the honor and dignity of the Notary position, resulting in a criminal sentence, the Notary shall also be subject to administrative sanctions as regulated in the Notary Office Act. The administrative sanctions against a Notary as stipulated in the Notary Office Act include:

1. Written warning

This is an initial warning given to the Notary to prevent further violations.

2. Temporary dismissal

This refers to a sanction in which the Notary is prohibited from carrying out their duties temporarily. Article 9 of the Notary Office Act regulates the temporary dismissal of a Notary from their position, stating that:

A Notary shall be temporarily dismissed from office due to:

- a. being in the process of bankruptcy or postponement of debt payment obligations;
- b. being under guardianship;
- c. committing disgraceful acts;
- d. violating duties, prohibitions, or the Notary Code of Ethics; or
- e. undergoing a period of detention.

A Notary may be temporarily dismissed from office for a certain period, resulting in the loss of authority to perform notarial duties. If a Notary faces bankruptcy

proceedings or postponement of debt payment obligations, it indicates an inability to maintain professional integrity. Likewise, a Notary under guardianship may also be temporarily dismissed. According to Article 10 paragraph (1) of the Notary Office Act, a Notary who has fulfilled all obligations related to bankruptcy or debt payments and is no longer under guardianship may be reinstated by the Minister after their rights are restored.

A Notary may also be temporarily dismissed for committing dishonorable acts or violating duties, prohibitions, and the Notary Code of Ethics as stipulated in the Notary Office Act. Furthermore, a Notary who is under detention may be temporarily suspended for up to six months. During this period, the Supervisory Board must decide whether the Notary is proven to have committed a violation. Article 10 paragraph (2) of the Notary Office Act stipulates that a Notary who has completed the suspension period may be reinstated by the Minister once the temporary dismissal has ended [13].

3. Dishonorable discharge

This refers to the permanent dismissal of a Notary from office, making it impossible to resume the position. The grounds for dishonorable dismissal are stated in Articles 12 and 13 of the Notary Office Act. Article 13 of the Act states:

“A Notary shall be dishonorably dismissed by the Minister if sentenced to imprisonment based on a court decision with permanent legal force for committing a criminal offense punishable by imprisonment for five (5) years or more.”

C. The Legal Validity of Deeds Prepared by Notary Employees on Behalf of a Notary Sentenced to More Than 5 Years of Imprisonment

In legal terminology, an employee is defined as an individual who works in a company, government agency, or similar institution. Employees carry out tasks and responsibilities in accordance with their respective positions and functions within the workplace. Based on the Law of the Republic of Indonesia Number 13 of 2003 concerning Manpower, Article 1 paragraph (2) defines labor as any individual who possesses the ability to work with the objective of producing goods and/or services for public or personal needs. The term “labor” encompasses all individuals actively engaged in the production process and contributing to the economy. Therefore, a person working in a notary’s office can be referred to as an employee, a notary staff member, or a worker. These terms refer to individuals involved in various duties and functions within the notary’s office, supporting the drafting and management of authentic deeds. They represent individuals engaged in the operational activities of the notary office, whether in administrative or technical capacities [14].

Notary employees play a crucial role in supporting various operational aspects, both inside and outside the office. Internally, they assist the notary in the administration of deeds, prepare documents required for deed drafting, record deed details in registers, and perform other administrative duties. Externally, they handle processes involving agencies such as the National Land Agency (BPN), the Tax Office, and the Regional Revenue Office (Dispenda).

Notary employees do not have the authority to sign or legalize authentic deeds; such authority is solely vested in notaries as public officials. Notary employees only assist in drafting and managing documents, while the notary bears full responsibility for the validity and authentication of the deed. Therefore, deeds prepared by notary employees on behalf of a notary must still be signed and ratified by the authorized notary in order to hold legal force. This ensures that the deed is legally valid and fulfills the formal requirements stipulated by law. If a notary employee exceeds their authority by producing a deed without the notary's approval, such an act can be considered forgery.

The legal validity of deeds prepared by a notary's employee on behalf of a notary who has been sentenced to more than five years in prison may be significantly affected. The notary's imprisonment raises doubts about the integrity and validity of such deeds, potentially undermining legal certainty and protection for the involved parties. Based on Law Number 2 of 2014 concerning the Position of Notary, Article 1 paragraph (1) defines a notary as a public official authorized to draw up authentic deeds. Conversely, notary employees only assist in drafting the deed's concept and have no authority to sign or authenticate it. Article 15 paragraph (1) emphasizes that only a notary has the authority to create authentic deeds, which must be signed by a duly authorized notary. Article 16 paragraph (1) requires notaries to act honestly, carefully, independently, and to safeguard the interests of all parties involved. Once a notary has been convicted of a criminal offense, their credibility and authority become questionable.

The Regulation of the Minister of Law and Human Rights of the Republic of Indonesia Number 19 of 2019, Article 92, stipulates that a notary sentenced to imprisonment of five years or more shall be dishonorably dismissed by the Minister, resulting in the loss of authority to perform their duties. Furthermore, Article 1868 of the Indonesian Civil Code (KUHPperdata) states that an authentic deed must be made in the form prescribed by law, by or before an authorized public official. Article 1869 further provides that any deed not fulfilling the requirements of Article 1868 cannot be considered authentic. Therefore, a deed prepared by a notary's employee on behalf of an unauthorized notary cannot be deemed valid.

Article 263 paragraph (1) of the Indonesian Penal Code (KUHP) stipulates that falsifying a document that creates rights or obligations constitutes a criminal act punishable by imprisonment for up to six years. Article 264 paragraph (1) further provides that forgery of official documents is punishable by imprisonment for up to eight years. Thus, a deed produced by a notary's employee without proper authority may be considered forgery. Consequently, any deed made or prepared by a notary's employee on behalf of a notary who has been sentenced to more than five years in prison and has lost their authority is deemed to lack legal force, to be invalid, and to constitute a form of deed forgery. Such a deed cannot serve as a legal basis and may result in legal consequences for the parties involved.

It is essential for all parties involved in the deed-making process to adhere to applicable procedures and regulations to maintain the integrity and validity of the document. Consulting a legal expert or another notary is strongly recommended to verify

the legality and enforceability of such deeds. This step ensures that the deed complies with all legal requirements and avoids issues related to its validity or integrity.

D. Legal Protection for Parties Harmed by Deed Forgery

According to Article 1867 of the Indonesian Civil Code (KUHPPerdata), an authentic deed is a document created in accordance with the provisions established by law and drawn up by or before a public official authorized to do so in the place where the deed is executed. An authentic deed possesses full evidentiary power, often referred to as perfect proof. This means that the authentic deed serves as strong and binding evidence in court without requiring additional verification of its contents. The primary function of an authentic deed is to prove that the parties involved have mutually agreed upon a contract, to ensure that the content of the agreement aligns with their intentions and objectives, and to serve as evidence to third parties that, on a specific date – unless stated otherwise – the parties had entered into an agreement whose contents reflect their genuine will.

Falsification of an authentic deed can be classified into two types: material falsification and intellectual falsification. Material falsification occurs when there is a defect in the physical form of the deed that affects its evidentiary value, while intellectual falsification occurs when the content of the deed does not correspond to the truth or actual circumstances. The latter can undermine the material authenticity of the document. In practice, disputes often arise due to notarial deeds based on forged documents, leading to potential harm for the involved parties. Forgery of documents constitutes a criminal act in which the information contained within the document is false, invalid, or deceitfully imitated.

Legal protection plays a vital role in upholding the rule of law, justice, and societal harmony. By providing clear guarantees of rights and obligations, legal protection ensures that every individual receives fairness and security while fostering social and legal stability. The law governs all aspects of human interaction – between individuals and between individuals and the government – and all actions must comply with applicable legal norms. Law enforcement will fail if regulations are not applied consistently. Justice is achieved when each individual can enjoy their rights and fulfill their obligations fairly. This reflects the true manifestation of justice, where everyone is treated equally and given the same opportunity to exercise their rights and duties. Social peace, which every individual desires, can only be realized when all members of society feel protected in every aspect of their lives. Such protection is achievable only through consistent and fair application of the law, ensuring both legal certainty and security for all parties involved.

When an authentic deed is falsified by a notary or a notary's employee, resulting in client losses, the response involves dispute resolution rather than prevention. In this context, legal protection is repressive in nature – its purpose is to resolve disputes that have already occurred. Legal protection may be granted to harmed clients through either criminal or civil proceedings in court.

Legal protection in both criminal and civil law aims to safeguard individual interests. Criminal law not only encompasses public interests and the imposition of sanctions but also provides protection in cases involving forgery of letters or authentic deeds, as stipulated in Article 264 paragraph (1) of the Indonesian Penal Code (KUHP). Although forgery of an authentic deed may lead to criminal sanctions, clients who suffer losses also have the right to seek protection through civil remedies.

Civil dispute resolution to protect clients can be pursued through a lawsuit based on Article 1365 of the Civil Code, which regulates unlawful acts. Furthermore, Article 1872 of the Civil Code provides that the enforcement of an allegedly falsified authentic deed may be suspended in accordance with the provisions of the civil procedural law (HIR). Based on Article 138 paragraphs (7) and (8) of the HIR, if there are doubts regarding the authenticity of an authentic deed, criminal proceedings concerning the deed may proceed, and the civil case will be postponed until a decision in the criminal case has been rendered. In other words, in cases of forgery involving authentic deeds, the aggrieved party may first file a criminal complaint. The criminal process will then be carried out to address the legal violation, while the civil case will be suspended until a ruling in the criminal case is issued. This ensures that the outcome of the criminal proceedings can directly influence the judgment in the related civil case.

If a notary is proven to have falsified client data, such an act constitutes a criminal offense that cannot be justified under the law. In addition to violating criminal provisions, it also contravenes the Civil Code and the regulations governing the notarial profession. Law enforcement related to notarial deeds must adhere to the procedural requirements stipulated by law, rather than focusing solely on the Penal Code, to avoid misconceptions regarding the notary's position and the function of authentic deeds as legal evidence in civil law. Therefore, if a notary's employee acts beyond their authority, any resulting authentic deed will lack legal force and cannot be enforced. The aggrieved parties may then file a civil lawsuit against the notary before the District Court [16].

CONCLUSION

Fundamental Finding : A notary who is sentenced to imprisonment for five years or more will be dismissed dishonorably by the Minister, thereby losing their authority as a notary. Therefore, any deed made by a notary's employee on behalf of a notary who has been sentenced to imprisonment for five years or more and has lost their authority is considered invalid, has no legal force, and is categorized as forgery. **Implication :** If a notary's employee acts beyond their authority, the resulting authentic deed will have no legal force and cannot be enforced. This highlights the importance of maintaining professional integrity and ensuring that only authorized notaries perform their legal duties. **Limitation :** The limitation of this finding lies in its dependence on statutory interpretation, as the research focuses on normative juridical analysis rather than empirical validation of how these provisions are enforced in practice. **Future Research :** The parties who suffer losses due to such actions may file a civil lawsuit against the notary in the District Court. Future studies could further explore the procedural

mechanisms, judicial responses, and implications for notarial accountability in Indonesia's legal system.

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REFERENCES

- [1] A. A. A. Prajitno, *Pengetahuan Praktis tentang Apa dan Siapa Notaris di Indonesia?* Surabaya, Indonesia: Putra Media Nusantara, 2010. Accessed: Aug. 08, 2024. [Online]. Available: https://openlibrary.org/books/OL25012303M/Pengetahuan_praktis_tentang_apa_dan_siapa_notaris_di_Indonesia
- [2] D. Napouling, "Pemberhentian Dengan Tidak Hormat Bagi Notaris Yang Melakukan Tindak Pidana (Studi Putusan Majelis Pengawas Pusat Nomor: 18/B/MPPN/XII/2017)," *Indonesian Notary*, vol. 4, no. 2, Jun. 2022. Accessed: Aug. 08, 2024. [Online]. Available: <https://scholarhub.ui.ac.id/notary/vol4/iss2/18>
- [3] I. Fadli, "Analisis Yuridis Penjatuhan Sanksi oleh Majelis Pengawas Notaris Wilayah Riau terhadap Notaris yang Melakukan Tindak Pidana dalam Jabatan," *Jurnal Locus Penelitian dan Pengabdian*, vol. 3, no. 1, pp. 92–103, Jan. 2024, doi: 10.58344/locus.v3i1.2407.
- [4] Subiyantana, "Pertanggungjawaban Pidana terhadap Notaris yang Membuat Keterangan Palsu dalam Akta Otentik," *ResearchGate*, Accessed: Aug. 08, 2024. [Online]. Available: https://www.researchgate.net/publication/348208747_Pertanggungjawaban_Pidana_terhadap_Notaris_yang_Membuat_Keterangan_Palsu_dalam_Akta_Otentik
- [5] A. Priono, W. T. Novianto, and I. G. A. K. R. Handayani, "Penerapan Teori Penafsiran Hukum oleh Hakim sebagai Upaya Perlindungan Hukum terhadap Notaris (Studi Atas Putusan Hakim terhadap Tindak Pidana Pemalsuan Akta Otentik)," *Jurnal Hukum dan Pembangunan Ekonomi*, vol. 5, no. 2, Art. no. 2, Jul. 2017, doi: 10.20961/hpe.v5i2.18260.
- [6] UU No. 2 Tahun 2014, *Database Peraturan | JDIH BPK*, Accessed: Aug. 08, 2024. [Online]. Available: <http://peraturan.bpk.go.id/Details/38565/uu-no-2-tahun-2014>
- [7] E. Purwaningsih, "Bentuk Pelanggaran Hukum Notaris di Wilayah Provinsi Banten dan Penegakan Hukumnya," *Mimbar Hukum - Fakultas Hukum Universitas Gadjah Mada*, vol. 27, no. 1, Art. no. 1, 2015, doi: 10.22146/jmh.15907.
- [8] I. Sajadi, N. Saptanti, and S. Supanto, "Tanggung Jawab Notaris terhadap Keabsahan Akta Notaris yang Dibuatnya atas Penghadap yang Tidak Dapat Membaca dan Menulis," *Sebelas Maret University*, 2015. Accessed: Aug. 08, 2024. [Online]. Available: <https://www.neliti.com/publications/213163/>
- [9] A. G. S. Putri, "Akibat Hukum Bagi Notaris yang Sudah Dipidana dan Berkekuatan Hukum Tetap tetapi Masih Menjalankan Jabatannya (Studi Kasus Putusan Mahkamah Agung

- Nomor 1175 K/PID/2016)," Universitas Indonesia Library, Accessed: May 27, 2024. [Online]. Available: <https://lib.ui.ac.id>
- [10] F. R. Gomies, "Notaris dalam Status Terpidana yang Masih Menjalankan Jabatannya," *Jurnal Magister Hukum ARGUMENTUM*, vol. 7, no. 1, Art. no. 1, Apr. 2020, doi: 10.24123/argu.v7i1.3009.
- [11] S. Mh. H. Adjie, *Hukum Notaris Indonesia: Tafsir Tematik Terhadap UU No. 30 Tahun 2004 Tentang Jabatan Notaris*, 2008. Accessed: Jul. 22, 2024. [Online]. Available: <https://www.semanticscholar.org/paper/Hukum-Notaris-Indonesia-%3A-Tafsir-Tematik-Terhadap-Adjie/5ba69596867414ce4ec573e8f6c75d582898cf14>
- [12] P. Dr. H. Salim HS., "Peraturan Jabatan Notaris", Google Play Books. Accessed: Aug. 08, 2024. [Online]. Available: https://play.google.com/store/books/details/Peraturan_Jabatan_Notaris?id=96FOEAA AQBAJ&gl=US&pli=1
- [13] S. A. Shalihah, "Reformulasi Norma Tentang Sanksi Pemberhentian Sementara Bagi Notaris yang Sedang Menjalani Masa Penahanan (Dalam Undang-undang Nomor 2 Tahun 2014 Tentang Jabatan Notaris)," Thesis, Universitas Islam Indonesia, 2023. Accessed: Jul. 22, 2024. [Online]. Available: <https://dspace.uui.ac.id/handle/123456789/45776>
- [14] E. Suarto, "Perlindungan Hukum Bagi Pegawai Notaris yang Menjadi Saksi yang Hadir dalam Pembuatan Suatu Akta (Instrumen dalam Akta Notaris)," Masters Thesis, Universitas Islam Sultan Agung, 2022. Accessed: Aug. 08, 2024. [Online]. Available: <https://repository.unissula.ac.id/26339/>
- [15] M. Siregar, "Tanggung Jawab Notaris dan Pegawai Notaris dalam Menjaga Kerahasiaan Akta," *Visi Sosial Humaniora*, Accessed: Aug. 06, 2024. [Online]. Available: https://www.academia.edu/75021113/Tanggung_Jawab_Notaris_Dan_Pegawai_Notaris_Dalam_Menjaga_Kerahasiaan_Akta
- [16] M. D. Nadine, "Bentuk Tanggung Jawab Notaris atas Penyalahgunaan Tugas oleh Oknum Pegawai Notaris," *Jurnal Integritas Moral Indonesia (JMI)*, vol. 1, no. 4, pp. 1171–1179, Dec. 2022, doi: 10.58344/jmi.v1i4.115

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