

A Legal Certainty Perspective On The Status of Notarial Deeds Not Recorded In The Repertorium

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Abstract.

A notarial deed is a legally binding instrument with full evidentiary value in the Indonesian legal system. Its presence is crucial to ensuring certainty, order, and legal protection for all parties. A primary duty of notaries is to record every deed in the repertorium, as required under Articles 58 and 59 of the Law Number 2 of 2014 concerning Amendments to Law Number 30 of 2004 on the Notarial Office (UUJN). The repertorium, part of the notarial protocol, must be submitted periodically to the Regional Supervisory Council as proof of accountability. In practice, however, some deeds remain unregistered, creating issues regarding their legal standing, certainty for the parties involved, and the notary's responsibility. This study applies a normative juridical method with statutory, conceptual, and case approaches. Data are drawn from regulations, doctrines, court decisions, and legal literature. The analysis emphasizes Gustav Radbruch's theory of legal certainty and its relevance to deed registration, particularly the juridical consequences of unregistered deeds. Findings reveal that while unrecorded deeds remain authentic if formal requirements are met, the lack of registration weakens accountability and may reduce evidentiary strength in court. Notaries failing to comply may face administrative sanctions under Article 65A UUJN, from warnings to temporary dismissal. Registration, therefore, is not merely administrative but essential to uphold certainty, justice, and the integrity of the notarial profession.

Keywords: *Notary's; Notarial Deeds and Repertorium.*

I. INTRODUCTION

Normatively, the position of the notary is governed by Law Number 30 of 2004 on the Notarial Office, later amended by Law Number 2 of 2014 (hereinafter referred to as the UUJN). Article 1, paragraph 1 of the UUJN stipulates that “a Notary is a public official authorized to draw up authentic deeds and has other authorities as provided by this Law or other laws.” This formulation affirms that the authority of notaries derives directly from statutory law, extending beyond the interests of private parties to encompass the wider public interest in legal certainty. (Tibing Lumban, 1983). As public officials, notaries exercise a state function in providing trustworthy legal services, since every deed they prepare carries formal guarantees of truth and validity. The principal authority vested in a notary is the making of authentic deeds. Article 1868 of the Indonesian Civil Code (KUHPPerdata) defines an authentic deed as “a deed drawn up in the form prescribed by law, by or before a competent public official at the place where the deed is made.” From this definition, it is clear that authentic deeds are not merely administrative records but binding legal documents possessing perfect evidentiary force, ensuring certainty in potential disputes. Consequently, authentic deeds provide absolute legal protection for society while minimizing the risk of future legal conflicts. (Setiawati et al. 2023).

Furthermore, the duties and responsibilities of notaries in carrying out their office are explicitly regulated under Article 16 of the Notarial Law (UUJN). A notary must act honestly, carefully, independently, impartially, and with due regard to the interests of all parties involved. These principles align with Article 28D paragraph (1) of the 1945 Constitution of the Republic of Indonesia, which guarantees that every person has the right to recognition, guarantees, protection, and fair legal certainty. This reflects that the notarial office functions as an extension of the state in realizing the principle of legal certainty, thereby making it an integral part of the national legal system. In addition to their authority in preparing deeds, notaries bear strict administrative obligations. One of the most significant responsibilities attached to the

office is recording deeds in the deed register, or repertorium.(Harsono, 2002). The repertorium serves a fundamental role as a means of control, documentation, and accountability for deeds executed by the notary. It is not merely an administrative record but a component of the notarial protocol that ensures every deed issued can be lawfully and accurately traced. The importance of the repertorium is evident, as the absence of orderly registration may undermine the administrative legitimacy of an authentic deed and create doubts regarding its use as evidence.(Sinaga, Paransi, dan Soepeno 2022).

The UUJN firmly stipulates this obligation under Articles 58 and 59, which declare that the repertorium is an inseparable part of the notarial protocol that must be systematically managed and submitted to the competent authority within specified periods.(Amalia, Musakkir, dan Muchtar 2021). This illustrates the legislative intent to ensure accountability, transparency, and continuity in preserving authentic documents. Such regulation further affirms that the state emphasizes documentation, as it is closely tied to legal certainty and the protection of parties' rights. Nevertheless, in practice, there are still instances where notarial deeds are not recorded in the repertorium. This situation creates serious legal problems.(Khafifa Bazar dan Silviana 2021). On one hand, the deed may have been executed in accordance with the formal requirements prescribed by law, yet on the other hand, it fails to meet the administrative obligations mandated by the Notarial Law (UUJN). This raises questions regarding the legal status of such deeds in terms of legal certainty, administrative validity, and the extent of legal protection for the parties bound by them. Viewed through the lens of the theory of legal certainty, registration of deeds in the repertorium provides stronger guarantees concerning their existence and authenticity. Gustav Radbruch's theory of legal certainty emphasizes that law must provide stability, clarity, and protection of individual rights.(Pratama, Warsito, dan Adriansyah 2022). By repertorium registration, each deed can be traced and verified by interested parties, including law enforcement authorities, thereby minimizing doubt. In this sense, repertorium registration represents the practical embodiment of the principle of legal certainty in notarial practice.(satjipto Raharjo 2012)

The issue of deeds not recorded in the repertorium is particularly significant, as it directly affects the integrity of Indonesia's notarial system. A notary's failure to fulfill this obligation can erode public trust in notarial deeds and may even give rise to legal disputes. The UUJN, through Article 65A, explicitly provides that a notary who neglects or violates their duties may be subject to sanctions, whether administrative, civil, or criminal, depending on the severity of the violation. This demonstrates that repertorium registration cannot be regarded as a mere formality but carries substantial legal implications. Accordingly, the existence of notarial deeds that are not recorded in the repertorium presents a fundamental issue regarding how legal certainty can be upheld and how the legal standing of such deeds should be viewed. This problem highlights a gap between the normative framework requiring repertorium registration and its implementation in practice, warranting further attention both academically and within the notarial profession.

II. METHODS

This research examines the theory of legal certainty concerning the legal position of notarial deeds that are not recorded in the deed register (repertorium). The study employs a normative legal research method. As a normative type of research, it not only analyzes the substance of statutory provisions but also seeks truth through logical reasoning from a normative perspective. This approach treats law as an autonomous and self-contained system, independent of external factors beyond the legal framework. The collection of legal materials, both primary and secondary, is conducted through an inventory process, after which the materials are analyzed in depth to uncover the *ratio legis* of the legal issue under study.(Abdulkadir Muhammad 2004). The method used is the statute approach, which involves examining relevant laws and regulations in detail. The legal issue addressed in this study concerns the application of the theory of legal certainty to the legal standing of notarial deeds that are not recorded in the repertorium. The statutory approach applied in this research refers to Law Number 2 of 2014 concerning Amendments to Law Number 30 of 2004 on the Notarial Office. In addition, the research also adopts a conceptual approach, drawing upon various scholarly views and legal doctrines that have developed within the field of law.

III. RESULT AND DISCUSSION

In the broader landscape of Indonesian legal development, the notary's role has long been regarded as pivotal, not only as a mere profession but as a public office entrusted with state authority to produce authentic deeds that serve as reliable legal instruments. By their very nature, authentic deeds carry binding and conclusive evidentiary weight, making them indispensable in ensuring legal certainty in civil transactions, property arrangements, contractual relationships, and, ultimately, in the settlement of disputes within judicial proceedings. (Ningsih, Jeddawi, dan Wargadinata, 2025) This elevated legal force distinguishes notarial deeds from other forms of private documentation. Nevertheless, the robustness of such deeds is not solely contingent upon their formal execution in accordance with statutory requirements; it is equally anchored in the faithful performance of administrative obligations that safeguard the transparency and accountability of the notarial function. One of the essential administrative duties of a notary lies in the obligation to record every deed in the repertorium. The repertorium constitutes a crucial component of the notarial protocol, designed to systematically document the sequence of deeds and ensure that each transaction remains traceable within the framework of supervisory mechanisms. (Inzaghi et al., 2024) By law, notaries are bound to maintain the repertorium in an orderly and consistent manner and to periodically submit it to the Regional Supervisory Council (Majelis Pengawas Daerah/MPD). This procedure is not merely a bureaucratic formality; rather, it embodies a vital system of checks and balances that upholds the credibility of the notarial institution and fosters public confidence in its impartiality and reliability.

The emergence of instances where notarial deeds are not duly recorded in the repertorium presents a problematic issue at the core of legal certainty. The absence of such registration not only weakens the administrative standing of the deed but also creates a legal vulnerability that could diminish its evidentiary value in judicial practice. In turn, this undermines the protective function of the notarial institution, which is intended to assure parties that their legal relations are secured through instruments recognized by the state. Furthermore, such lapses can gradually erode public trust in the notarial office, as the expectation of professionalism and adherence to legal norms becomes compromised. Gustav Radbruch, in his theory, states that law must embody three fundamental values: justice, utility, and legal certainty. Legal certainty is an element that cannot be disregarded, for without certainty, the law cannot fulfill its function as a regulator of social life. (Latifah dan Suprpto, 2024). Legal certainty requires rules that are clear, consistent, predictable, and objectively enforced by competent authorities. In the context of the notarial profession, legal certainty is realized by creating authentic deeds that fulfill the formal requirements stipulated in Law Number 30 of 2004 on the Office of Notary, as amended by Law Number 2 of 2014 (UUJN). One of the essential instruments that guarantees the legal certainty of a notarial deed is the obligation to record every deed in the repertorium. The repertorium functions as an official register of deeds, serving as an authentic record of all deeds drawn up by a notary, thereby enabling both the public and the authorities to verify the existence of a deed in an administrative capacity. When a deed is not registered in the repertorium, its legal certainty becomes questionable. A deed intended to have authentic character may be deemed not to meet the necessary administrative requirements, thus raising doubts regarding its legal status and evidentiary value. This aligns with Radbruch's view that law loses one of its principal foundations without certainty, which may result in uncertainty and injustice for the parties concerned. (satjipto Raharjo, 2012)

An authentic deed occupies a central and dominant role in evidentiary law, as it functions as definitive proof not only for the parties who executed it but also for their successors, possessing binding legal force. The notion of *definitive proof* implies that an authentic deed, by its very nature, is sufficient to establish a legal fact or event without the necessity of supplementary evidence. On the other hand, its binding character requires that the statements and facts recorded within the deed be accepted as accurate and presumed to reflect the true circumstances. Should any party dispute or question its authenticity, the responsibility to demonstrate its invalidity falls upon the contesting party. In addition, an authentic deed consolidates key components commonly found in other evidentiary instruments such as written documents, witness testimony, presumptions, confessions, and sworn statements. (Satya Wibowo, Najwan, dan Abu Bakar, 2022) This integration makes it one of the most comprehensive and authoritative forms of legal proof, elevating its evidentiary value above other types of evidence in judicial practice.

The repertorium is an administrative record and an integral part of the notarial protocol. The notarial protocol encompasses the minuta of deeds, repertorium, and other documents that a notary must maintain as part of the state archive. Article 63 of the UUJN expressly provides that the notarial protocol constitutes a state archive which must be properly safeguarded and preserved. Furthermore, Article 16 paragraph (1) letters h through k of the UUJN explicitly set forth the obligation of notaries to record all deeds in the repertorium, including the sequential number, date, and the identity of the appearing parties.(Ningsih et al., 2025). Furthermore, this administrative obligation is reinforced by the provision requiring that the repertorium be submitted to the Regional Supervisory Council (*Majelis Pengawas Daerah*, MPD) every month. This mechanism is intended to ensure effective oversight of notarial performance and to guarantee that no deed is created in secrecy or without proper registration. Accordingly, noncompliance with the obligation to record deeds in the repertorium not only constitutes a violation of the UUJN but also undermines the internal supervision system over the notarial profession. In this sense, the repertorium is essential for realizing legal certainty, since it allows every deed to be traced, verified, and administratively confirmed. A notarial deed that is not recorded in the repertorium raises a fundamental issue concerning the guarantee of legal certainty.(Hudaya, 2022). From a juridical perspective, such a deed may still qualify as authentic if it satisfies the formal requirements under Article 1868 of the Indonesian Civil Code (*KUHPerdata*) and the provisions of the UUJN. Nevertheless, the absence of repertorial registration weakens the administrative dimension that ensures order and transparency within the notarial administration.

The regulations governing the preparation, management, storage, and submission of a Notary's protocol are explicitly stipulated in Law Number 30 of 2004 concerning the Notary Office. These provisions are detailed in Articles 58 through 65A, which outline the various obligations a Notary must fulfill in managing their protocol. Specifically, Article 58 paragraphs (1) and (2) set forth the administrative duties that every Notary is required to observe in the management of their protocol. This demonstrates that a Notary's protocol is not merely an administrative record, but holds the status of a legal document with significant value. Consequently, the state has established a specific legal framework to regulate the proper recording, storage, and submission of these protocols.(Fa'Adillah, 2025). Therefore, a Notary's responsibilities extend beyond the mere drafting of deeds to include ensuring that the protocol, as part of the state archives, is securely maintained, systematically organized, and managed in accordance with the prevailing legal regulations. In practice, if it is proven that a deed has not been recorded in the repertorium, the parties concerned may question its administrative validity. Moreover, a judge in court proceedings may consider such a fact as one of the grounds in evaluating the evidentiary strength of the deed. In other words, while an unrecorded deed may formally retain its status as authentic, its probative value can be diminished due to the failure to meet the administrative requirement. This condition gives rise to legal uncertainty, as the parties engaging in a transaction through such a deed cannot obtain full assurance that the deed they rely upon is duly valid and properly registered within the notarial administrative system. Such a situation is clearly inconsistent with Radbruch's conception of the purpose of law, which is to provide both certainty and justice for the parties involved.

The legal standing of a notarial deed that is not recorded in the repertorium is considered administratively weak. Under the theory of evidentiary law, an authentic deed, as defined in Article 1868 of the Indonesian Civil Code (*KUHPerdata*), is a document drawn up in the form prescribed by statute, executed by or before a public official authorized to do so. Such a deed carries conclusive evidentiary value (*volledig bewijs*) unless proven otherwise. In practice, the content of a notarial deed must be presumed correct by both the court and the parties involved, except when sufficient counterevidence is presented.(Anke Dwi Saputro, 2008) Nevertheless, a legal gap emerges when a deed is not entered into the repertorium, enabling the opposing party in a dispute to challenge its evidentiary strength. Accordingly, while the deed in question formally retains its character as an authentic deed so long as it satisfies the statutory requirements, it may simultaneously be regarded as suffering from an administrative defect. This irregularity does not automatically nullify the deed, since annulment is only possible in the presence of substantive defects, such as a lack of authority of the notary or violations of a contract's subjective and objective requirements. However, the omission of repertorium registration diminishes public confidence in the deed and grounds

judges to conclude that it fails to fully reflect the principle of legal certainty.(Umbas dan Santoso, 2022) In judicial proceedings, it is still possible for an unregistered deed to be admitted as evidence, yet its probative value may be downgraded. A judge may consider such a deed to carry no more weight than a private deed that has been corroborated, thereby stripping it of the full binding force ordinarily attached to authentic deeds.

This situation places the contracting parties, who are supposed to enjoy complete legal protection through an authentic deed, in a more vulnerable position, as the guarantee of legal certainty over the deed they rely upon is effectively weakened. Viewed through the lens of Gustav Radbruch's legal philosophy, sanctions imposed on notaries who negligently or deliberately fail to record deeds in the repertorium can be seen as a concrete application of the principle of legal certainty.(Hartono, 2025). Radbruch emphasizes that law must embody three fundamental values: justice, utility, and legal certainty. Legal certainty is significant, as it ensures predictability and consistency within society. Without legal certainty, the pursuit of justice and utility cannot be realized coherently. Within the notarial profession, the obligation to record deeds in the repertorium, as mandated by Articles 58 and 59 of the Notarial Office Act (*UU Jabatan Notaris*), should not be regarded as a mere administrative formality. Rather, it is a vital instrument to secure order, transparency, and accountability in exercising notarial authority. The repertorium serves as an official record allowing notarial deeds to be traced, monitored, and verified by the Regional Supervisory Council (*Majelis Pengawas Daerah*) or by law enforcement authorities when necessary. Consequently, failure to comply with this duty carries serious implications for the enforceability of deeds, the credibility of the notarial profession, and public trust in Indonesia's notarial system as a whole.If a notary neglects or disregards the obligation to record a deed in the repertorium, such conduct violates the legal certainty principle that should be upheld in notarial practice. Clients who rely on notarial services are entitled to assurance that the deeds they obtain possess full evidentiary force in accordance with the law. However, when a deed is not duly entered into the repertorium, its validity becomes questionable, generating legal uncertainty. This situation not only undermines the function of the deed as an authentic instrument of evidence but also places the parties at a disadvantage, since the legal standing of the deed may be weakened if examined in judicial proceedings.

From the perspective of Gustav Radbruch's legal theory, such a scenario illustrates law's failure to realize one of its fundamental values, legal certainty alongside justice and utility. Accordingly, the imposition of sanctions on notaries who disregard this duty is appropriate and necessary to restore the function of law as an instrument for ensuring social order and protecting the interests of society.(Maghribi dan Ispriyarso, 2022).The Notarial Office Act (Undang-Undang Jabatan Notaris or UUJN) establishes a comprehensive legal framework regarding the consequences for notaries who fail to fulfill their statutory obligations. Specifically, Article 65A of the UUJN provides that notaries who neglect or violate the provisions outlined in Articles 58 and 59, including the mandatory recording of deeds in the repertorium, may be subjected to administrative sanctions. These sanctions are designed to be applied in a graduated manner, ranging from verbal and written warnings to temporary suspension and ultimately to dismissal, either with or without honor, depending on the severity and frequency of the violation. Such a framework reflects the legislature's acknowledgment that the proper maintenance and registration of the repertorium are vital to preserving the integrity of the notarial office and the enforceability of authentic deeds. In this sense, sanctions function not merely as punitive measures but also as preventive and corrective tools, ensuring that notaries consistently adhere to their official duties, uphold professional accountability, and reinforce the principles of legal certainty that underpin the notarial system in Indonesia.

In addition to administrative sanctions, a notary may be held civilly liable if their negligence harms the parties involved. In more serious situations, where it can be proven that a notary intentionally concealed a deed by failing to record it in the repertorium, criminal liability may also be imposed in accordance with applicable laws.(Sudarwanto, 2020). Such sanctions reflect how seriously the state regards the obligation to register deeds in the repertorium as an essential component of legal certainty. In other words, repertorium registration is not merely a routine administrative duty, but an integral element of the legal system that safeguards certainty, order, and transparency in notarial services. Furthermore, the imposition of sanctions carries a preventive function. A notary who is aware of the potential legal consequences of failing to record

deeds will be encouraged to exercise greater discipline in fulfilling their professional duties. This aligns with Gustav Radbruch's perspective that law is not solely a repressive instrument for punishing wrongdoing but also a means of shaping behavior to conform with established norms. Thus, sanctions not only serve to correct mistakes after they occur but also act as a deterrent to prevent similar violations in the future. (Adistia, 2024).

Radbruch's theory also frames law within the triad of justice, utility, and legal certainty. In this context, imposing sanctions on notaries who neglect to record deeds in the repertorium addresses more than legal certainty; it also ensures fairness for the parties involved. The public has the right to clarity regarding the legal status of the deeds they rely upon, and this right is protected through the repertorium system. When that right is compromised due to a notary's negligence, justice demands accountability by enforcing sanctions. Accordingly, under Radbruch's framework, sanctions on notaries who fail to record deeds carry a dual meaning. First, they function as a tool to uphold legal certainty, which is the foundation of notarial practice. Second, they operate both preventively and repressively to ensure that the law continues to serve the values of justice and utility. Thus, the imposition of sanctions may be seen as the state's effort to maintain equilibrium among Radbruch's values while simultaneously strengthening the legal standing of notarial deeds as authentic instruments guaranteed by law.

IV. CONCLUSION

Based on the analysis, it can be understood that notarial deeds not recorded in the repertorium present significant challenges to the principle of legal certainty. From a formal perspective, such deeds still qualify as authentic instruments per Article 1868 of the Indonesian Civil Code (KUHPerdata) and the provisions of the Notary Office Act (UUJN). However, their position becomes fragile from an administrative standpoint, as the absence of repertorium registration may diminish their evidentiary strength before the law. The repertorium serves a fundamental role as a mechanism of supervision, documentation, and accountability for every deed executed by a notary. Thus, registration within it constitutes an essential element in ensuring legal certainty. If a notary negligently or deliberately fails to fulfill this obligation, such conduct is not only contrary to the UUJN but also undermines the principle of legal certainty as emphasized in Gustav Radbruch's legal theory. Accordingly, the imposition of sanctions, whether administrative, civil, or even criminal on notaries who neglect this duty represents a concrete measure to preserve the profession's integrity while providing fair legal protection for society. Therefore, repertorium registration should not be regarded as a mere administrative formality, but as a fundamental aspect in realizing the principles of certainty, justice, and utility within notarial practice in Indonesia.

REFERENCES

- [1] Abdulkadir Muhammad. 2004. *Abdulkadir Muhammad Hukum dan Penelitian Hukum*. Bandung: Citra Aditya Bakti.
- [2] Harsono, Boedi. 2002. *Hukum Agraria Indonesia, Sejarah Pembentukan Undang-Undang Pokok Agraria, Isi dan Pelaksanaannya*. 9 ed. Jakarta: Djambatan
- Anke Dwi Saputro. 2008. *Jati Diri Notaris Indonesia Dulu, Sekarang dan di Masa Datang: 100 Tahun Ikatan Notaris Indonesia*. Jakarta: PT. Gramedia Pustaka.
- [3] Tibing Lumban, G. H. S. 1983. *Peraturan Jabatan Notaris*. Jakarta: Erlangga.
- [4] Satjipto Raharjo. 2012. *Ilmu Hukum*. Bandung: Citra Aditya Bakti.
- [5] Adistia, Meisya. 2024. "Pertanggungjawaban PPAT terhadap Akta Jual Beli Berdasarkan Keterangan Palsu yang diberikan oleh Para Pihak." *Notaire* 7(1):87–102.
- [6] Amalia, Rizky, Musakkir Musakkir, dan Syamsuddin Muchtar. 2021. "Pertanggungjawaban Notaris terhadap Isi Akta Autentik yang Tidak Sesuai dengan Fakta." *Al-Ishlah: Jurnal Ilmiah Hukum* 24(1):188–206.
- [7] Fa'Adillah, Daffa. 2025. "Analisis Tinjauan Tentang Peran Dan Tanggung Jawab Notaris Dalam Pembuatan Akta Perjanjian." *Edupreneur Jurnal Pendidikan dan Ekonomi* 1(1):19–31.
- [8] Hartono, Honggo. 2025. "Sinkronisasi Peraturan Perundang-Undangan PPAT dan Notaris Berdasarkan Pancasila." 4(1):1–15.
- [9] Hudaya, Sonny Gondo. 2022. "Sah Tidaknya Pembuatan Akta Notaris Secara Elektronik Berdasarkan Teori Hukum Positif Yang Berlaku." *Al Qodiri : Jurnal Pendidikan, Sosial dan Keagamaan* 19(3):566–78.

- [10] Inzaghi, Pippo, Dasan Laiskodat, Fakultas Hukum, dan Universitas Narotama. 2024. "Analisis Kewenangan Notaris Pengganti Dalam Penerbitan Salinan dan Minuta Akta Untyk Keterangan Hukum di Pengadilan." *Journal Hukum Bisnis* 8:1315–25.
- [11] Khafifa Bazar, Berti Nova, dan Ana Silviana. 2021. "Perlindungan Hukum Terhadap Hak dan Kewajiban Pejabat Pembuat Akta Tanah." *Notarius* 14(1):29–38.
- [12] Latifah, Latifah, dan Suprpto Suprpto. 2024. "Electronic Notarial Deed Register Book (Repertorium) In The Digital Era." *Jurnal Hukum Sehasen* 10(2):551–66.
- [13] Maghribi, Muhamad Fadli, dan Budi Ispriyarso. 2022. "Peran PPAT Terhadap Aspek Perpajakan Dalam Transaksi Jual Beli Tanah Dan Bangunan." *Notarius* 15(1):105–19.
- [14] Ningsih, Retno Wahyu, Murtir Jeddawi, dan Ella L. Wargadinata. 2025. "Kinerja Majelis Pengawas Daerah Notaris Dalam Pengelolaan Protokol Notaris Di Kota Jakarta Barat." *Jurnal Kajian Pemerintah: Journal of Government, Social and Politics* 11(1):56–65..
- [15] Pratama, Brilian, Happy Warsito, dan Herman Adriansyah. 2022. "Prinsip Kehati-Hatian Dalam Membuat Akta Oleh Notaris." *Repertorium: Jurnal Ilmiah Hukum Kenotariatan* 11(1):24–33.
- [16] Satya Wibowo, Wahyu, Johni Najwan, dan Firdaus Abu Bakar. 2022. "Integritas Notaris Sebagai Pejabat Pembuat Akta Autentik dalam Undang-Undang Jabatan Notaris." *Recital Review* 4(2):323–52.
- [17] Setiawati, Diana, Hary Abdul Hakim, Chrisna Bagus Edhita Praja, Nabila Anisahaq, Cindy Dwi, Qori Endah, Erni Tyas, dan Erna Putri. 2023. "Penyuluhan Mengenai Pentingnya Pembuatan Akta Otentik Sebagai Bentuk Kepastian Hukum Bagi Masyarakat Desa Daleman." *Borobudur Journal on Legal Services* 4(1):1–7..
- [18] Sinaga, Raja Indo, Eugenius Paransi, dan Muhammad Hero Soepeno. 2022. "Kekuatan Pembuktian Akta Di Bawah Tangan Menurut Hukum Perdata." *Lex Privatum* 10(5):2.
- [19] Sudarwanto, Stefanie Waringga Y. dan Albertus Sentot. 2020. "Tanggung Jawab Notaris Yang Memiliki Kewenangan PPAT Dalam Pembuatan surat Kuasa Membebaskan Hak Tanggungan." *VIII*(2):310–15.
- [20] Umbas, Felenvi Olivia, dan Budi Santoso. 2022. "Perlindungan Hukum Terhadap Notaris dan PPAT Dalam Menjalankan Profesinya." *Notarius* 15(2):883–92. doi:10.14710/nts.v15i2.37459.