

The Responsibility of Land Deed Making Officials and Notaries in Illegal Land Rights Transfer (Case Study of Nirina Zubir Land Mafia)

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Abstract. *The involvement of rogue Land Deed Officials (PPAT) and Notaries in illegal land title transfers, exemplified by the case of Nirina Zubir, constitutes a severe breach of their Profession Code of Ethics and professional oath. This highlights their failure to perform the principle of due diligence, as it is exploited by involving themselves in land mafias practice. The professional duty to act with honesty, integrity, diligence, independence, and impartiality, mandated by the Code of Ethics, the Notary Public Law (UUJN), and Regulation on the Office of the PPAT is violated when an authentic deed is issued based on forged documents or false identities. Such actions directly cause significant material losses and trigger a Tort (Perbuatan Melawan Hukum/PMH) under Article 1365 of the Civil Code. The consequences of these ethical violations are layered, encompassing professional disciplinary sanctions (ranging up to dishonorable discharge by the Notary Honorary Council or the PPAT Honorary Assembly), along with potential civil and criminal liability. This makes it a crucial issue demanding rigorous legal and ethical enforcement to restore the profession's integrity and ensure legal certainty in land affairs.*

Keywords: *Illegal; Land; Notaries; Transfers.*

1. Introduction

Ownership of land objects can be transferred, as referred to in Agrarian Law (UUPA), either thru legal acts or thru legal events (Ulina & Sudiro, 2022). The transfer of land rights thru legal acts can be done thru buying and selling, exchange, donation, contribution to a company, and division of joint rights. In legal acts transferring land rights, it is necessary to execute by the PPAT or Notary in the relevant land area (I. K. O. Setiawan, 2021). The process of transferring land rights requires the role of PPAT or Notary to ensure legal protection in case of errors or disputes regarding the transfer of land rights. This guaranty of land rights transfer is made with an authentic deed, which is a deed made before a PPAT or a Notary (Widianingrum & Badriyah, 2025).

With the presence of PPAT and Notaries, land transactions can be carried out more safely. However, there are many cases where PPAT and Notaries abuse their authority in the illegal practice of transferring land rights, along with land mafia parties. In land mafia practices, there are groups that act as the front line by abusing their professions, namely lawyers, PPATs, notaries, and government officials from the central, regional, sub-district, and village levels, to provide support both legally and illegally (Miranda, E. 2022). The involvement of PPAT and Notaries in land mafia practices is a violation of their professional responsibilities. In The Government Regulation Number 24 of 2016 concerning Amendments to Government Regulation Number 37 of 1998 concerning Regulations on the Position of Land Deed Official (PP Jabatan PPAT), it is stipulated PPAT has the obligation to act diligently, carefully, and responsibly to ensure that the process of transferring land rights proceeds in accordance with applicable legal provisions. The act of creating a false deed is clearly a serious violation of the PPAT profession (Kusumawardhani, 2022). Likewise for notaries, as discussed in Article 16 of the Notary Position Law, it is stipulated that notaries must act with integrity, honesty, diligence, independence, impartiality, and safeguard the interests of the parties involved during the deed-making process (Rahman, 2019). Document forgery in the practice of transferring land rights is a violation of the notary profession. This unlawful act not only causes harm to the victims of document forgery but also disrespects the professions of PPAT and Notary, potentially damaging public trust in their professions (Utama et al., 2024).

In this study, the author will discuss a case study regarding the illegal transfer of land rights experienced by the artist, Nirina Zubir. This illegal land rights transfer process was facilitated by three PPAT/Notaries, who transferred land assets worth 17 million rupiah. This included two land certificates sold to third parties and four land and building certificates successfully mortgage. Several previous studies on actors indicates serious attention to legal protection in cases of unlawful land rights transfer. Research by Akmal et al. *Land Law Reform: Legal Protection of Land Rights against Unlawful Transfer of Right* (2023), highlights illegal land rights transfer actions, particularly thru the analysis of the Nirina Zubir case, but has not yet addressed the professional responsibility of PPATs or Notaries. Kaligis et al, *Legal Protection for Landowners Thru the Sale and Purchase Process in the Transfer of Land Rights* (2025), also discussed the complex issue of PPAT's responsibility in land rights transfer practices, but did not further examine the analysis of the public official's professional code of ethics. Meanwhile, Krismiatri, *Responsibility of the Deed-Making Official (PPAT)* (2022), has reviewed the legal responsibilities and the Code of Ethics of PPAT and Notaries in the unlawful transfer of land rights thru sale and purchase deeds, but did not specifically link it to the phenomenon of land mafia or actual case studies.

Based on the previous studies, the researcher will examine a new discussion focusing on the role and responsibilities of PPAT/Notaries in cases of illegal land rights transfer, using the Nirina Zubir case study, and will deeply examine the resulting consequences and implications for the professional code of ethics as an effort to provide a more comprehensive legal perspective. This research is urgent as an affirmation of the responsibilities and professional code of ethics of PPAT and Notaries as a prevention against illegal land rights transfer practices, such as the one experienced by Nirina Zubir.

2. Research Methods

This research uses the normative juridical research method, understanding and discussing written legal materials in accordance with applicable regulations or positive law. The problem-solving approach used by the author in this study is the case approach and the statute approach. The case approach was conducted by examining cases related to the legal issue the author wishes to address, and which have the force of law. The legislative approach was conducted by examining applicable laws and regulations related to the legal issue the author wishes to address. Primary legal materials, as the main source, are legal materials that have authority, such as legislation. Secondary legal materials are legal materials intended to provide clarification on primary legal materials. In this study, secondary legal materials include research results, books and texts, and scientific journals. Tertiary legal materials are legal materials intended to provide further clarification on both primary and secondary legal materials. In this study, tertiary legal materials come from news and internet media.

3. Results and Discussion

3.1. The Civil Liability of PPAT and Notaries for Illegal Land Rights Transfer Practices

Illegal land rights transfers are one of the major issues in the field of land law. The actors behind the infringement of these land ownership rights are land mafia organizations (Akmal et al., 2023). Cases of illegal land rights transfers often involve the role of professionals who are supposed to guaranty the legality of documents and legal processes, such as PPAT and Notaries (Widianingrum & Badriyah, 2025). Legal protection for land rights holders becomes increasingly vulnerable when these public officials choose to participate in unlawful practices and abuse their authority (Amalia et al., 2024).

The well-known actress Nirina Zubir was a victim of unlawful land transfer procedures in 2021 that involved PPAT/notaries' roles. It started when Riri Kasmita, a domestic servant, said that Nirina's late mother's land certificate had vanished. After promising to take care of the "missing" certificates, Edrianto and Riri's spouse then exploited the situation to steal six land ownership certificates (SHM). Following the mother's passing, an inquiry showed that the criminals had worked with three PPAT/Notaries, which are Farida, Ima Rosiana, and Erwin Riduan to give the artist and her husband ownership of the six certificates (Noor, et al., 2024).

The National Land Agency (BPN) of DKI Jakarta confirmed that three out of the six stolen land certificates were successfully sold by suspects Riri and Edrianto. The names of the three

PPAT/Notaries were then brought up again after they were proven to have played a role as legal facilitators in land sale and purchase transactions without the knowledge of the rightful owners (Endrico, M., & Tjempaka, T. 2023). Regarding to the *modus operandi*, it involves forging signatures, errors in recording the Population Identification Number (NIK), and using forged power of attorney documents. It was further revealed that the unsold certificates had been pawned to a bank by the suspect as business capital. The flow of funds is also being investigated by the authorities (Pastika et al., 2022).

According to Civil Code Article 1365, the land deed official's or notary's conduct in this unlawful transfer of land rights constitute an Unlawful Act. That item makes it quite clear that "Every unlawful act that causes damage to another person obliges the person who caused the damage via their fault to compensate for that damage." The family of Nirina Zubir has suffered a great deal of financial loss as a result of the PPAT/Notary's acts in this case, which included document falsification and unlawful name transfers, making accountability necessary. Therefore, the Land Deed Official/Notary needs to be responsible for their actions and compensate the injured party as stated in Article 48 Paragraph (3) of UUJN (Afwin, P., & Mangapul Sirait, R. 2023).

The Theory of Legal Responsibility is also in conflict with the PPAT/Notary's conduct concerning the unlawful transfer of land rights. Legal responsibility, also known as liability, according to Hans Kelsen, is the idea that an individual is legally responsible for a certain activity and may face consequences for their illegal behavior (Chandra et al., 2024). A land deed official or notary has personal responsibility for carrying out their responsibilities and holding their post during the deed preparation process (Y. A. Setiawan & Suroto, 2023). As a public official who drafts deeds, a PPAT or notary must be accountable for their role in offering their clients the finest service possible from the time the deed-making procedure is finished until the deed's validity is established. Regarding the repercussions of producing an unlawful deed of sale, as was the case in that instance, it results in the presence of legal flaws in the genuine document. If a PPAT or notary makes a legally flawed deed, the court will either declare it to be inauthentic or null and void, meaning it never existed (Y. A. Setiawan & Suroto, 2023).

The actions of the PPAT/Notary in this illegal transfer of land rights clearly contradict this theory, which requires public officials to act with care and honesty, as explained in the Notary Office Law (UUJN). According to UUJN Article 16 Paragraph 1 Letter (a), "A notary is obliged to act with integrity, honesty, diligence, independence, impartiality, and to protect the interests of the parties involved in the legal act." Therefore, it is understandable that the actions of the PPAT/Notary official do not reflect the attitude of a trusted public official, who ought to offer legal certainty but instead committed an illegal conduct by drafting a deed that was legally faulty (Larandika & Handono, 2023). PPAT/Notary has their responsibilities in carrying out their duties and authorities, so if there is a violation of applicable laws or the code of ethics, they must be held accountable for implementing the sanctions. These actions as contrary to

the principles of public officials cause public doubt about the professionalism of PPATs and Notaries (Ulina & Sudiro, 2022).

3.2. The Code of Ethics for Land Deed Officials and Notaries in the Illegal Transfer of Land Rights

Every public official must act carefully, just as PPATs and Notaries must do when performing legal actions in the preparation of deeds to examine the facts relevant to their consideration of applicable laws and regulations. If a PPAT and Notary are not thorough when examining relevant facts, they have failed to uphold the principle of due diligence. The principle of prudence is understood as the foundation of thinking that is done before something is carried out, in order to consider the possibilities that could occur and avoid problems in the future. If a PPAT and Notary are not thorough when examining relevant facts, they have failed to uphold the principle of due diligence (Aulia, 2022). The principle of due diligence is understood as the foundation of thinking that is done before something is carried out, in order to consider the possibilities that could occur and avoid problems in the future (Pratama, 2022). As public officials whose actions can result in the transfer of rights, it is only fitting that PPAT and Notaries act cautiously in carrying out their duties and authorities. Applying the principle of prudence to PPAT and Notary institutions is a preventive measure to criminalize their civil, administrative, ethical, and even criminal liability. As a public official, it's their authority to produce an authentic deed cannot be underestimated, as his services are essential for creating perfect evidence, given that authentic deeds are understood to be true (Hutagalung, T. P., et al. 2021).

The affirmation of the professional responsibility of PPATs and Notaries is carried out thru the implementation of ethical code regulations. Therefore, regulations were established to govern the duties and authority of the PPAT profession, such as Government Regulation (PP) Number 24 of (2016) concerning Amendments to Government Regulation Number 37 of 1998 concerning Regulations on the Position of Land Deed Official (PP Jabatan PPAT). Subsequently, the PPAT Code of Ethics was established by the Indonesian Association of Land Deed Officials (IPPAT) in the Appendix to the Decree of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency Number 112/KEP-4.1/IV/2017. IPPAT members include all PPATs and Substitute PPATs who are required to uphold the regulations in the PPAT Code of Ethics, not only while performing their duties but also throughout their daily lives. If a member of IPPAT violates the Code of Ethics, the Honor Council, as the body responsible for implementing the PPAT Code of Ethics, has the authority to issue decisions and sanctions for such violations. The forms of sanctions imposed for violations of the PPAT Code of Ethics are as follows:

- a. Reprimand;
- b. Warning;
- c. Suspension (temporary dismissal) from IPPAT membership;

- d. *Onzetting* (dismissal) from IPPAT membership; and
- e. Dishonorable discharge from IPPAT membership (Permen ATR, 2018).

Meanwhile, a Notary is obliged to comply with the Notary Law and the Notary Code of Ethics based on the Extraordinary Congress Decision of the Indonesian Notary Association (INI) dated January 27, 2005, which was established by the Indonesian Notary Association (INI), in order to uphold the professional ethics, honor, dignity, and responsibility of notaries (Permen ATR, 2018). If a member of INI violates the Notary Code of Ethics, the Honor Council, as the body responsible for overseeing the implementation of the Notary Code of Ethics, can take action on decisions and sanctions against such violations. As for the forms of sanctions imposed for violations of the Notary's Code of Ethics, they are:

- a. Reprimand;
- b. Warning;
- c. Temporary suspension from INI membership;
- d. Honorable termination of INI membership;
- e. Dishonorable termination of INI membership (Permen ATR, 2018).

The wrong doings of illegal land rights transfer carried out by the three PPAT/Notary officials in the Nirina Zubir case constitutes a violation of their public official profession, as they acted unprofessionally and abused their authority by assisting the land mafia in forging Ibu Nirina Zubir's land deeds. In this case, the PPAT/Notary is considered to have violated their oath of office and disregarded the principle of due diligence by not conducting a thorough examination of the appearing party identities and by failing to verify the validity of the ownership documents and power of attorney (Krismiatri, 2022). Therefore, the three PPAT/Notary officials need to be held accountable for their actions regarding the violation of ethical codes. IPPAT has acknowledged the violation of the PPAT Code of Ethics by the individual, leading to enforcement thru the deactivation of the PPAT account by the Indonesian Ministry of Agrarian Affairs and Spatial Planning/National Land Agency (Rokhana, 2024). Additionally, the three PPAT/Notary officials must also bear criminal responsibility for their actions, which are contrary to the professional Code of Ethics, violate Article 264 paragraph (2) of the Criminal Code, Article 55 paragraph (1) of the Criminal Code, and Article 3 of Law No. 8 of 2010 concerning the Prevention and Eradication of Money Laundering (Rokhana, 2024). As criminal liability, the PPAT/Notary officials received prison sentences: Indah Rosaina and Faridah were sentenced to two years and eight months in prison, while Erwin Ridwan was sentenced to two years in prison, and each was fined one 1 million rupiah.

4. Conclusion

The illegal practice of transferring land rights is a land law issue that requires in-depth analysis, particularly regarding the involvement of certain PPAT and Notary officials. The case involving

actress Nirina Zubir shows how serious this problem is, where individuals within the Land Deed Officials/Notaries collaborated with land mafia groups to facilitate the transfer of ownership of six freehold certificates (SHM) thru document forgery, even creating invalid sale and purchase deeds. Legally, the actions of the PPAT/Notary official that caused significant material losses to the victim are classified as Unlawful Acts (PMH) under Article 1365 of the Civil Code. Furthermore, such actions are clearly contrary to Hans Kelsen's Theory of Legal Responsibility, which outlines that a person can be sanctioned for their unlawful actions. The legal consequence of creating this invalid deed of sale is that the authentic deed becomes legally flawed and has the potential to be declared inauthentic or null and void by the court. The involvement of PPAT/Notaries in this illegal scheme also indicates a serious violation of the code of ethics and principles of public office. PPAT/Notaries have an obligation to act with integrity, honesty, diligence, independence, and to safeguard the interests of the relevant parties, as mandated by Article 16 Paragraph (1) letter (a) of the UUJN. The failure of individuals to conduct maximum verification of the identity of the person appearing and the validity of documents, as well as the falsification of deeds, constitutes a disregard for the essential principle of due diligence, which is crucial for preventing the criminalization of professional responsibility. This ethical code violation triggered the enforcement of sanctions by both the IPPAT Honor Council and the INI Honor Council, which could range from reprimands and warnings of dishonorable dismissal from their profession. As a follow-up, the PPAT accounts have been deactivated by the Ministry of Agrarian Affairs and Spatial Planning/National Land Agency of the Republic of Indonesia. Therefore, these PPAT/Notary officials are required to bear dual responsibility, both civilly, ethically, and criminally, for actions that undermine professionalism and certainty.

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