

Position of Land Deed Making Official (PPAT) in *Bevoegdheid Bestuurs* Perspective in Cirebon Regency

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Abstract. *The research objective was to identify and describe: 1) Position of Land Deed Making Official (PPAT) in the perspective of Bevoegdheid Bestuurs. 2).The weaknesses of the position of the Land Deed Making Official (PPAT) from the perspective of Bevoegdheid Bestuurs. 3).The administrative responsibility of the Land Deed Making Official (PPAT) for deeds that are legally flawed from a Bevoegdheid Bestuurs perspective. The approach method used in this research is normative juridical. This type of research is classified as a descriptive analytical research. The data collection technique used literature study techniques, while the data analysis was descriptive qualitative analytical. The results show that 1. Basically the delegation of part of the authority to carry out land registration is one form of implementing the Bevoegdheid guidelines. Where the Bevoegdheid guideline referred to is the public authority or authority possessed by BPN as government. Thus it can be said that the PPAT obtained delegation authority from BPN. It is said to have obtained delegation authority because the position of BPN as a government agency is higher than that of PPAT. 2. Weaknesses arising from the position of PPAT in the perspective of Bevoegdheid bestuur is the occurrence of maladministration as a form of abuse of authority in making authentic deeds. 3. The form of PPAT administrative accountability for deeds with legal defects is divided into two areas. First, according to Article 62 PP No. 24 of 1997 is subject to sanctions in the form of: a) warning; b) Warning; c) Schorsing and d) Disrespectful termination of IPPAT membership. Second, Article 13 paragraph (1) Permen ATR No. 2 of 2018 regulates the development of the types of sanctions in PPAT into: a) written warning; b) temporary dismissal; c) honorific dismissal; and d) dishonorable discharge.*

Keywords: *Position of PPAT; Bestuur Bevoegdheid.*

1. Introduction

Along with the changing times, the occurrence of globalization and modernization, as well as the development of science and technology, causes the land to no longer be viewed solely with a conservative perspective. Land has

begun to function as a center for industrial activities, other business activities that have economic value, and are designated as commercial or economic buildings and other uses. This will create a large potential for land dispute issues as well as conflicts related to or caused by land. This requires a set of laws (rules) and land management that are neat, orderly, and systematic with the aim of preventing conflicts or disputes in the agrarian or land sector.¹

So that in order to avoid various kinds of undesirable things, it is necessary to carry out supervision related to land regulation in this country. One of the supervision referred to is the management of land registration. Article 19 paragraph (2) letter b of Act No. 5 of 1960 concerning Basic Agrarian Principles (UUPA) regulates that some of the duties and authorities of the government or *Bevoegdheid Bestuurs* in terms of land registration can be divided into, namely:²

1. Registration of land rights, is the registration of rights for the first time or the bookkeeping of land rights in the list of land books.
2. Registration of transfer of land rights.

According to Syafruddin Kalo said that, "we can see legal certainty from two angles, namely certainty in the law itself and certainty due to the law." Furthermore, Syafruddin Kalo stated that:³

Certainty in law means that each legal norm must be formulated with sentences in it that do not contain different interpretations. The result will lead to law-abiding or non-compliance behavior. In practice, many legal events arise, where when faced with the substance of legal norms that govern them, sometimes it is unclear or imperfect so that different interpretations arise which consequently will lead to uncertainty. Certainty in law means that each legal norm must be

¹ Dhea Tri Febriana & Ahars Sulaiman. "Tanggung Jawab Pejabat Pembuat Akta Tanah (PPAT) Dalam Pembuatan Akta Jual Beli Tanah Berdasarkan Peraturan Pemerintah Republik Indonesia Nomor 24 Tahun 2016 Tentang PPAT", *Jurnal Petita*, Vol. 1, No. 1, June 2019, p. 125.

² I Gusti Bagus Yoga Prawira. "Tanggung Jawab PPAT Terhadap Akta Jual Beli Tanah", *Jurnal IUS*, Vol. 4, No. 1, April 2016, p. 64.

³ Syafruddin Kalo. "Penegakan Hukum yang Menjamin Kepastian Hukum dan Rasa keadilan Masyarakat" replace taken from <http://www.academia.edu.com> accessed on January 8, 2020.

formulated with sentences in it that do not contain different interpretations. The result will lead to law-abiding or non-compliance behavior.

Furthermore, Satjipto Rahardjo as quoted by Syafruddin Kalo said that:⁴

One of the aspects in legal life is certainty, that is, the law intends to create certainty in the relationship between people in society. One that is closely related to the issue of certainty is the problem of where the law comes from. Certainty regarding the origin or source of law has become important since law has become an increasingly formal institution.

In connection with land registration, the community needs legal certainty in services related to land registration. Article 1 number 1 Government Regulation of the Republic of Indonesia Number 24 of 2016 concerning Amendments to Government Regulation Number 37 of 1998 concerning the Position of Land Deed Making Officials states that: "Land Deed Making Officials, hereinafter referred to as PPAT, are public officials who are authorized to make deeds. - Authentic deeds regarding certain legal actions regarding land rights or property rights over apartment units".⁵ Juridically, PPAT is classified as a public official who is appointed and dismissed by the Minister. PPAT juridically carries out some government affairs in the land sector (exercising executive authority or *Bevoegdheid Bestuurs*). PPAT is appointed by the government, in this case the National Land Agency (BPN) with certain duties and authorities in order to serve the needs of the community for deeds of transfer of land rights, deeds of assignment of rights to land, and deeds of granting power to impose mortgage rights as regulated in statutory regulations. Valid invitation.⁶

Then the PPAT was even given the authority (*Bevoegdheid*) to use a stamp bearing the national emblem "Garuda Pancasila". The interesting thing is that PPAT is not paid by the State even though it is classified as a public official, and PPAT is normatively justified in receiving compensation for work it does in the land sector, according to the prevailing laws and regulations. This is what makes PPAT's position unique and different from other public officials, both state and regional officials. The position of the PPAT as outlined has further implications in

⁴ Satjipto Rahardjo, (2012). *Ilmu Hukum*, Bandung: Citra Aditya Bakti. p. 4.

⁵ Tim Penyusun Naskah Akademik dan Rancangan Undang-Undang Tentang Jabatan Pejabat Pembuat Akta Tanah. (2019). *Naskah Akademik dan Rancangan Undang-Undang Tentang Jabatan Pejabat Pembuat Akta Tanah*, Jakarta, Badan Keahlian Dewan Perwakilan Rakyat Republik Indonesia. p. 11.

⁶ Jimly Asshiddiqie. "Independensi Dan Akuntabilitas Pejabat Pembuat Akta Tanah", *Jurnal Renvoi*, Vol. 3, June 2003. p. 31.

relation to the authority and responsibilities of PPAT, as well as the legal consequences, one of which is the juridical defect deed made by or before PPAT.

Based on the various explanations above, it is necessary to discuss this issue more deeply in the thesis entitled "The Position of Land Deed Making Officials (PPAT) in the Perspective of *Bevoegdheid Bestuurs* in Cirebon Regency". This study seeks to answer problems regarding the position of the Land Deed Making Official (PPAT) in the perspective of *Bevoegdheid Bestuurs* in Cirebon Regency, the weaknesses of the position of the Land Deed Making Officer (PPAT) in the perspective of the *Bevoegdheid Bestuurs* in Cirebon Regency, and the administrative responsibility of the Land Deed Maker Officer (PPAT) against deeds that are legally flawed in the perspective of *Bevoegdheid Bestuurs* in Cirebon Regency.

2. Research Methods

The approach method used in this research is the normative juridical approach method. Specification the research used is descriptive analytical, which describes the applicable laws and regulations in relation to legal theories and their implementation practices.⁷ Primary and secondary data sources obtained by interview and study document methods. Data analysis using qualitative analysis.

3. Results and Discussion

3.1 Position of Land Deed Making Official (PPAT) in *Bevoegdheid Bestuurs* Perspective

The Official for Making Land Deeds (PPAT) as mentioned in Article 1 number 1 PP No. 24 of 2006 is a public officials who are given the authority to make authentic deeds regarding certain legal actions regarding land rights or property rights over flats. As a public official (private notary), PPAT is given the general power to serve the community's needs for authentic evidence that provides legal certainty in the land sector. The general power inherent in the status and position of public officials is an obligation delegated by the state to serve the public, provide legal protection and guarantees in order to achieve legal certainty in society.⁸

⁷ Sumardi Suryabrata. (1993). *Metodologi Penelitian*. Jakarta: Rajawali. p.19.

⁸ M. Syahrul Borman. *Kedudukan Notaris Sebagai Pejabat Umum dalam Perspektif Undang-Undang Jabatan Notaris, Jurnal Hukum dan Kenotariatan*, Vol.3, No.1, February 2019. p.78.

Basically, the types of public officials (*openbare amtenaren*) in Indonesia are separated into two types, namely public officials with PNS (Civil Servant) and non-PNS status. General PNS officers consist of PNS members who have been appointed as public officials in accordance with statutory regulations such as civil registration officers whose duties are to issue certificates but not more than one or two types such as birth certificates, death certificates, marriage and divorce certificates. Meanwhile, non-PNS general officers consist of notaries, PPATs, and class II auction officers.⁹

The difference in the separation of public official positions is suspected to be a form of implementation of the implementation of general principles of good governance (AAUPB). AAUPB's function in government administration is as a guide or guide for the government or state administrative officials in the framework of good governance. AAUPB is also said to be a signpost for state administrators in carrying out their duties so that government actions remain in accordance with legal corridors.¹⁰ AAUPB is applied especially to public officials who come from civil servants who are related to the implementation of public services.

Apart from reflecting the implementation of AAUPB, the separation of public official positions is also based on law enforcement efforts. Law enforcement is obtained with legal certainty. In administrative principles, the validity of authority, procedure, and substance is the main requirement for an administrative product which is said to fulfill legal certainty.¹¹

In relation to public administration in the land sector, both PPAT and the government cq the National Land Agency (BPN) have the authority to manage land. According to Article 13 paragraph (1) of Act No. 5 of 1960 concerning Agrarian Principles (Act No.5 of 1960), the government is obliged to regulate businesses in the agrarian field aimed at increasing production and the welfare of the people as referred to in Article 2 paragraph (3) and guarantees the welfare of every Indonesian citizen in accordance with human dignity. In order to regulate the use of agrarian space, further in Article 19 of Act No. 5 of 1960

⁹ Fayakundia Putra Sufi. *Pemisahan Jabatan Pejabat Umum di Indonesia, Jurnal Perspektif*, Vol. 22, No. , Tahun 2017, Edisi September. p.193.

¹⁰ Solechan. *Asas-Asas Umum Pemerintahan yang Baik dalam Pelayanan Publik, Administrative Law & Governance Journal*, Vol.2, Issue 3, August 2009. p.544.

¹¹ Peter Mahmud Marzuki. (2010). *Penelitian Hukum*. Jakarta : Kencana Prenada Media. p. 82.

states that, the government shall register land throughout the territory of the Republic of Indonesia in order to guarantee legal certainty.¹²

Specifically, land registration as referred to above is regulated in Government Regulation Number 24 of 1997 concerning Land Registration (PP No. 24 of 1997). According to Article 5 of Government Regulation No.24 of 1997, land registration is carried out by BPN. It is further explained in Article 6 that:

Article 6

(1) In the framework of implementing land registration as referred to in Article 5, the duties of implementing land registration shall be carried out by the Head of the Land Office, except for certain activities which are assigned by this Government Regulation or the relevant legislation to other officials.

(2) In carrying out land registration, the Head of the Land Office is assisted by PPAT and other officials assigned to carry out certain activities according to this Government Regulation and the relevant laws and regulations.

Basically, the delegation of part of the authority to carry out land registration is one form of implementation of the *Bevoegdheid* guidelines. Where the *Bevoegdheid* guideline referred to is the public authority or authority possessed by BPN as an organ of government. BPN obtained attributive authority from Act No.5 of 1960 to regulate and manage the land sector.¹³ In order to carry out government management, BPN delegates part of its authority in the field of land registration to PPAT. Thus it can be said that the PPAT obtained delegation authority from BPN.¹⁴ It is said to have obtained delegation authority because the position of BPN as a government agency is higher than that of PPAT.

It should be underlined that the concept of *Bevoegdheid* guidelines stops at the granting of delegation authority from BPN to PPAT. This is because the public authority is only owned by government institutions / agencies as regulated in Act no. 30 of 2014 concerning Government Administration. Where it has been clearly explained above that PPAT is a public official so that it is not attached to public authority. PPAT can only act as a recipient of a delegation from the authority given by BPN / Ministry of Agrarian Affairs.

¹² Boedi Harsono. (2003). *Hukum Agraria Indonesia: Sejarah Pembentukan Undang-Undang Pokok Agraria, Isi, dan Pelaksanaannya*. Jakarta: Djambatan. p.12.

¹³ Article 1 number 22 Act No. 30 of 2014 concerning Government Administration.

¹⁴ Article 1 number 23 Act No. 30 of 2014 concerning Government Administration.

3.2 PPAT's Position Weaknesses in *Bevoegdheid's* Bestuurs Perspective

When talking about the weaknesses of the position of the PPAT in the perspective of *Bevoegdheid* guidelines, it will involve reviewing the rights and obligations arising from the *Bevoegdheid* guidelines. The rights and obligations that arise include:

1. Rights received by PPAT

The rights obtained by the PPAT as a result of the delegation's authority over land registration include:

- a. Being appointed as a public official is therefore attached to the rights held by non-PNS public officials;
- b. Appointed and dismissed by the Minister;
- c. Domiciled in a regency / city area;
- d. PPAT may hold concurrent positions with the position of notary in one working area;
- e. PPAT can change place of domicile and work area;
- f. Using a stamp whose shape and size are determined by the Minister;
- g. Receive service fees (honorarium) for each land registration transaction.

2. Obligations of the PPAT

The obligations that arise include:

- a. Subject to the oath of office that has been stated;
- b. Carrying out land registration activities by issuing deeds regarding legal actions related to land rights or ownership rights to apartment units;
- c. Delivering office address, sample signature, initial sample, and stamp of position to the Head of the Regional Office of the National Land Agency, Regent / Mayor, Chairman of the District Court, and Head of the Land Office whose territory includes the PPAT working area;
- d. PPAT is obliged to have only one office at its domicile;

- e. In the event that the PPAT has concurrent positions with a notary, it must have the same office as the domicile of the notary;
- f. Put up a nameplate and use a stamp as determined by the Minister;
- g. Filing and arranging deeds of land registration transactions;
- h. Carrying out a profession in a professional manner and it is prohibited to make deeds for husbands or wives, their families by blood or by blood, in a straight line without limitation in degree and in a sideways line up to the second degree either by acting alone or through power of attorney, or being the power of another party; and
- i. Send monthly reports regarding the deeds that have been made to the Head of the Land Office and other offices in accordance with statutory regulations;

In connection with the concept of *Bevoegdheid* guidelines, especially in granting delegation authority, is the formation of guidance and supervision carried out by BPN / Ministry of Agrarian Affairs to PPAT periodically as regulated in Article 33 paragraph (1) PP No. 24 of 2016. In more detail, the development and supervision of PPAT is regulated in the Regulation of the Minister of Agrarian and Spatial Planning / Head of the National Land Agency No. 2 of 2018 concerning Guidance and Supervision of Land Deed Making Officials (Permen ATR No.2 of 2018). The main objective of PPAT guidance and supervision is to realize the integrity of the PPAT based on the provisions in the statutory regulations and the PPAT code of ethics.

Types of maladministration acts can be in the form of *Daad van Willekeur*, namely actions without legal basis or arbitrary actions, *Depou voir Tournaments*, namely the abuse of power or authority where a state administrative official acts and issues a decision using the authority of his position for other purposes, *Exces de pou voir* is an act beyond the authority of one's office. The cause of Maladministration is negligence due to ignorance of the authority that has been given to him. Apart from protracted delays, another form of maladministration practice that was found was the Sale and Purchase Deed which was not read out by the PPAT in detail but only explained the contents of the deed in an outline,¹⁵

The maladministration act above is a form of abuse of authority owned by PPAT. In this case the abuse has led to the idea of an intentional element, in which

¹⁵ Marlo Gustia. *Penerapan Hukum Pengenaan Bea Perolehan Hak Atas Tanah dan Bangunan (BPHTB)*, *Jurnal Ius Kajian Hukum dan Keadilan*. Vol.IV, April 2016. p.67-68.

PPAT individuals want to commit acts against the law by abusing their authority. This abuse of authority may occur as a result of the granting of delegation authority from BPN. Where the problem of entrapment of abuse of power is not only carried out by PPAT as a general official, but can also be carried out by temporary PPAT or special PPAT.

3.3 PPAT Administrative Responsibility for Deeds with Legal Disabilities in *Bevoegdheid's* Bestuurs Perspective

Regarding the PPAT accountability issue, two theories of accountability that underlie it can be analyzed, namely:¹⁶

1. The theory of *fautes personals*, which is a theory that states that losses to third parties are borne by officials who because of their actions have caused losses. In this theory the burden of responsibility is directed at humans as individuals.
2. *Fautes de services* theory, which is a theory that states that losses to third parties are borne by the agency of the official concerned. According to this theory, responsibility is assigned to the position. In terms of its application, the losses incurred are adjusted according to whether the mistakes committed are serious mistakes or minor mistakes, where the weight and lightness of an error has implications for the responsibility that must be borne.

Based on the *Fautes Personales* Theory, it is known that PPAT is obliged to be responsible for making deeds that are legally flawed because it is an act of abuse of authority (*maladministration*). This is due to the fact that the existing authority in the PPAT based on Article 2 PJPPAT has been misused so that in the end the use of the authority is not in accordance with the purpose of granting the authority itself. PPAT errors due to abuse of authority have been regulated in PP No. 37 of 1998.

This theory directs PPAT to be careful and careful in issuing an authentic deed, considering that a PPAT is considered to have professional abilities both theoretically and practically. Thus, if a PPAT is negligent in drawing up the deed, and the deed is legally flawed, it can be said that there has been an abuse of authority, because the relevant PPAT realizes that as a public official who is

¹⁶ *Ibid.* p.69.

authorized by law, every PPAT is required to handle a case that is related to their authority, and cannot be separated from allegations of abuse of power.

In the perspective of *Bevoegdheid Bestuurs*, accountability for the issuance of deeds that are legally flawed becomes the realm of administrative accountability. This is because the occurrence of maladministration may occur due to administrative errors or errors (accidental elements). The regulation regarding administrative accountability has been regulated in Article 62 of Government Regulation No. 24 of 1997 which reads,

Art 62

PPAT which in carrying out its duties ignores the provisions referred to in article 38, article 39 and article 40 as well as the provisions and instructions given by the Minister or the appointed Official is subject to administrative sanctions in the form of a written warning until dismissal from his position as PPAT (Article 10 PJPPAT) , it is also stipulated in article 6 paragraph (1) of the IPPAT Code of Conduct, namely that members who violate the code of conduct may be subject to sanctions in the form of:

- a. Sign;
- b. Warning;
- c. Schorsing (temporary suspension) from IPPAT membership;
- d. Disrespectful termination of IPPAT membership.

This administrative responsibility can also take the form of fines, especially those related to taxation authority which is an additional PPAT authority granted by the tax law. This is as regulated in Article 91 paragraph (1) of Act No. 28 of 2009 concerning Regional Taxes and Regional Levies (Act No. 28 of 2009). Article 91 paragraph (1) of Act No.28 of 2008 states that PPAT / notaries can only submit proof of tax payments. This article becomes the basis for the imposition of sanctions as regulated in Article 93 of Act No. 28 of 2009 which regulates, PPAT / notary and head of office in charge of state auction services, who violate the provisions as referred to in Article 91 paragraph (1) and paragraph (2) will be subject to administrative sanctions in the form of a fine of IDR 7,500,000.

In addition, Article 13 paragraph (1) Permen ATR No. 2 of 2018 regulates the development of the types of sanctions in PPAT into: a) written warning; b) temporary dismissal; c) honorific dismissal; and d) dishonorable discharge. The

sanction was imposed on PPAT which violated the provisions as regulated in Article 12 paragraph (1) Permen ATR No. 2 of 2018 which includes: a) violations of the implementation of the PPAT position; b) does not carry out the obligations stipulated in statutory regulations; c) violating the prohibited provisions stipulated in statutory regulations; and / or d) violates the code of conduct.

4. Closing

4.1 Conclusion

The conclusions of this research are:

1. Basically, the delegation of part of the authority to carry out land registration is one form of implementation of the *Bevoegdheid* guidelines. Where the *Bevoegdheid* guideline referred to is the public authority or authority possessed by BPN as an organ of government. BPN obtained attributive authority from Act No.5 of 1960 to regulate and manage the land sector. In order to carry out government management, BPN delegates part of its authority in the field of land registration to PPAT.
2. The weakness that arises from the position of the PPAT in the perspective of the *Bevoegdheid* guidelines is the occurrence of maladministration as a form of abuse of authority in making authentic deeds.
3. The form of PPAT administrative accountability for deeds with legal defects is divided into two areas. First, according to Article 62 PP No. 24 of 1997 is subject to sanctions in the form of: a) warning; b) Warning; c) Schorsing d) Dishonorable termination of IPPAT membership.

4.2 Suggestion

1. The government, through the Ministry of ATR / BPN, needs to increase supervision and guidance to PPAT to take firm action against PPAT who are legally proven to have abused their authority which results in accountability in the administrative, civil and criminal realms.
2. The government needs to evaluate the laws and regulations relating to PPAT and carry out norm reforms to regulate the dynamics of changes in PPAT performance.
3. This administrative accountability needs to be re-evaluated, especially in relation to compensation to parties who have suffered losses due to

administrative errors committed by PPAT. In PP No.24 of 1997 and Permen ATR No. 2 of 2018 only focuses on providing sanctions to PPAT without paying attention to the material aspects of losses received by related parties.

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