

## Notary's Responsibility for Making Inheritance Certificates That Do Not Involve All Heirs

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**Abstract.** *This study aims to analyze: 1) The notary's responsibility for making a certificate of inheritance that does not involve all heirs. 2) Legal protection for the parties for making a certificate of inheritance that does not involve all heirs. The approach method used in this study is the empirical legal approach method. This type of research is analytical descriptive research. The types and sources of data in this study are primary data and secondary data obtained through interviews and literature studies. The analysis in this study is qualitative. The results of the study concluded: 1) The notary's responsibility for making a certificate of inheritance that does not involve all heirs can be subject to civil liability, criminal liability, responsibility in carrying out his/her position towards the notary and responsibility for the code of ethics. The notary's responsibility in making a certificate of inheritance is seen depending on what errors are in the Deed of Inheritance made by the Notary. The responsibility of a notary is not limited to law alone, but can also be in the form of moral and ethical responsibility, so that in making a certificate of inheritance if the notary makes a mistake or takes actions that are detrimental to the parties or one of the interested parties, the notary must be morally and ethically responsible or fully responsible. 2) Legal protection for the parties for making a certificate of inheritance that does not involve all heirs is Repressive protection can be obtained by other heirs through complaints through court lawsuits, either criminal lawsuits or civil lawsuits. Legal protection for heirs in disputes over making a certificate of inheritance that does not involve all heirs, in addition to receiving repressive protection, actually also receives preventive protection. Preventive legal protection for land ownership rights holders is by registering the land.*

**Keywords:** Certificate; Heirs; Inheritance; Notary.

## **1. Introduction**

The development of legal science and the need for law in society is taking on more and more forms. Agreements that are applied. The agreement is increasingly developing along with the development of the times, to obtain certainty and legal protection, the community pours the agreement into an authentic deed. Article 1868 of the Civil Code requires that a deed have the power of authentic evidence, it must be made by an authorized Public Official. So not everyone can or may make an authentic deed, but only public officials who are authorized by law to make authentic deeds.<sup>1</sup> One of the officials who makes authentic deeds is a Notary.

The journey of notaries in Indonesia has developed in accordance with the development of the State and nation of Indonesia. Contemporary Indonesian history records that in the reform era there was a significant change in the notary institution. This change was marked by the success of the Reform order government in enacting Law Number 30 of 2004 concerning the Position of Notary (UUJN), which was later updated by Law Number 2 of 2014.<sup>2</sup> A notary is a public official who is authorized to make authentic deeds and other authorities as referred to in Law Number 2 of 2014 concerning the amendment to Law Number 30 of 2004 concerning the Position of Notary (hereinafter referred to as UUJNP). In its explanation, it is stated that a notary is a public official who is authorized to make authentic deeds as long as the making of certain authentic deeds is not specifically for other public officials. The need for written agreements to be made before a notary is to ensure legal certainty and to fulfill strong evidentiary laws for the parties to the agreement.<sup>3</sup>

The purpose of making written agreements before or made by a Notary is so that the deed becomes an authentic deed that can be used as strong evidence if at any time there is a dispute between the parties or there is a lawsuit from another party. An authentic deed provides

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<sup>1</sup>Maslikan, Sukarmi, Notary's Authority in Making Authentic Deeds Related to Cooperation Contracts, *Jurnal Akta*, Volume 5 Number 2 March 2018, p.15

<sup>2</sup>Rita Permanasari, Akhmad Khisni, Legal Immunity for Notaries Who Reveal Secrets, *Position, Journal of Deeds*, Volume 5 Number 2 March 2018, p.26

<sup>3</sup>Abdul Jalal, Suwitno, Sri Endah Wahyuningsih, Involvement of Notary Officials in Unlawful Acts and Participation in Criminal Acts in Document Forgery, *Jurnal Akta*, Volume 5 Number 1 March 2018, p.228

binding and perfect evidence for the parties (and their heirs).<sup>4</sup>The power inherent in an authentic deed is perfect and binding, which means that if the evidence of the Authentic Deed submitted meets the formal and material requirements and the opposing evidence presented by the defendant does not reduce its existence, it is simultaneously attached to the power of perfect and binding proof (*volledig en bindende bewijskracht*), thus the truth of the contents and statements contained therein become perfect and binding to the parties regarding what is stated in the deed. Perfect and binding to the judge so that the judge must make it a perfect and sufficient factual basis for making a decision on the settlement of the disputed case.<sup>5</sup>

Notaries have an important role in making authentic deeds in the field of inheritance. Several legal experts in Indonesia have tried to provide a formulation regarding the definition of inheritance law, one of which is according to Wirjono Prodjodikoro who states that inheritance is a matter of whether and how various rights and obligations regarding a person's wealth at the time of his death will be transferred to the living.<sup>6</sup>According to Soepomo, inheritance law is a law that contains regulations governing the process of passing on and transferring tangible property and intangible property from one generation of humans to their descendants.<sup>7</sup>

Inheritance problems are still the cause of disputes in society, this is possible because they do not understand inheritance in depth. Sometimes inheritance problems are seen as less important in scientific principles, considering that the problem is considered something common in life. But once a dispute arises in society about it, they do not know how to resolve it peacefully, so that the dispute becomes a legal dispute that is brought to the realm of lawsuits in court.<sup>8</sup>

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<sup>4</sup>Kunni Afifah, Responsibility and Legal Protection for Notaries in Civil Law Regarding the Deeds They Make, *Lex Renaissance Journal*, Number 1 Volume 2 January 2017, p.150

<sup>5</sup>Christin Sasauw, Legal Review of the Binding Power of a Notarial Deed, *Lex Privatum Journal*, Volume III Number 1, 2015, p. 100.

<sup>6</sup>Tinuk Dwi Cahyani, 2018, *Inheritance Law in Islam*, Muhammadiyah University of Malang, Malang, p.9

<sup>7</sup>*Ibid*, p. 10

<sup>8</sup>Zainuddin Ali, 2010, *Implementation of Inheritance Law in Indonesia*, Sinar Grafika, Jakarta, p.15

One of the deeds made by a notary is a certificate of inheritance. A certificate of inheritance is required in the case of changing the name of a land certificate. This is explained in the Explanation of Article 42 paragraph (2) of Government Regulation Number 24 of 1997 concerning Land Registration.<sup>9</sup>In addition to the above functions, the Certificate of Inheritance as a certificate in relation to the process of every agreement that intends to transfer land rights, grant new rights to land, mortgage land or borrow money with land rights as collateral must be proven by a deed made by and before a PPAT.<sup>10</sup>

Notaries in their duties and positions are often found to be true, if there is a Notarial deed that is blamed by the parties or other parties, then the Notary is often implicated as a party who participated in or helped commit a crime, namely making or providing false information into the Notarial deed. This raises confusion as to whether it is possible that the Notary intentionally (*culpa*) or unintentionally (*alpa*) together with the parties or parties to make a deed that was intended from the start to commit a crime and how the Notary is responsible for the deed.<sup>11</sup>

The responsibility of a notary as a public official in making authentic deeds has a very important role in maintaining the integrity, validity, and legal certainty in legal transactions. One of the important duties of a notary is the preparation of a certificate of inheritance, where the notary plays a role in preparing documents that regulate the distribution of inheritance to the entitled heirs. However, there are situations where a notary is involved in making a certificate of inheritance that does not involve all heirs who should be entitled to receive the inheritance.

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<sup>9</sup>Denny Widi Anggoro, Miya Savitri, 2016, Normative Legal Review of Transfer of Land Rights Due to Inheritance According to Government Regulation Number 24 of 1997 Concerning Land Registration, *Journal of Legal Panorama*, Volume 1 Number 1, Malang, Faculty of Law, Kanjuruhan University, Malang, p.77

<sup>10</sup>Annisa Aprilianingrum, 2018, Notary's Responsibility for Invalid Heir Certificates in the Perspective of Law Number 30 of 2004 Concerning the Position of Notary in Conjunction with Law Number 2 of 2014 & Notary's Code of Ethics, *Private Law*, Volume 6 Number 1, p.105

<sup>11</sup>Habib Adjie, 2009, *Observing the Treasury of Indonesian Notaries and PPATs (Collection of articles on Notaries and PPATs)*, Citra Aditya Bakti, Bandung, p. 24

## **2. Research Methods**

This type of research is analytical descriptive research. The approach method used in this study is the empirical legal approach method. The types and sources of data in this study are primary data and secondary data obtained through interviews and literature studies. The analysis in this study is qualitative.

## **3.Results and Discussion**

### **3.1. Notary's Responsibility for Making Inheritance Certificates That Do Not Involve All Heirs**

One of the deeds made by a notary is a certificate of inheritance. A certificate of inheritance is required in the case of changing the name of a land certificate. This is explained in the Explanation of Article 42 paragraph (2) of Government Regulation Number 24 of 1997 concerning Land Registration.<sup>12</sup> The subject of inheritance law is the heir and the beneficiary. The subject of inheritance law is very important, considering that this Certificate of Inheritance is a means of evidence for parties who claim themselves as heirs, and in turn functions as a basis for claiming certain rights to objects or property rights as objects of inheritance. In principle, the inheritance law system, both BW, Customary Law and Islamic Law have determined who is included as an heir. Regarding the object of inheritance, in customary law and Islamic inheritance law, the rights of the heirs are net assets after deducting all obligations of the testator.

Notaries in making a Certificate of Inheritance often find the reality, if there is a Notarial deed that is blamed by the parties or other parties, then the Notary is often implicated as a party who participated in or helped commit a crime, namely making or providing false information into the Notarial deed. This raises confusion as to whether it is possible that the Notary intentionally (*culpa*) or unintentionally (*alpa*) together with the parties or parties to make a deed that was intended from the start to commit a crime and how the Notary is responsible for the

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<sup>12</sup>Denny Widi Anggoro, and Miya Savitri, 2016, Normative Legal Review of the Transfer of Land Rights Due to Inheritance According to Government Regulation Number 24 of 1997 Concerning Land Registration, *Journal of Legal Panorama* Volume 1 Number 1, Faculty of Law, Kanjuruhan University of Malang, Malang, p.77

deed.<sup>13</sup>

The theory of responsibility explains that a person is legally responsible for a certain act. This means that a person is responsible for a sanction if the act committed is against the law. Negligence is a condition in which the legal subject or perpetrator is careless, less careful, does not heed his obligations or forgets to carry out his obligations. Hans Kelsen divides responsibility into 4 (four) types, namely:<sup>14</sup>

1. Individual accountability is the accountability that must be carried out for violations that one has committed oneself.
2. Collective liability means that an individual is responsible for an offense committed by another person.
3. Liability based on fault means that an individual is responsible for the violation he/she committed because it was intentionally estimated with the aim of causing harm.
4. Strict liability means that an individual is responsible for any violation he or she commits due to unintentional or unforeseen circumstances.

The concept related to legal obligation is the concept of responsibility. A person is said to be legally responsible for a certain act if that person can be subject to sanctions in the case of an unlawful act.

One example of a notary case that also acted as a defendant was because he made a certificate of inheritance number 11.392/24/IV/2010 that did not involve all heirs. It started with the defendant named JS falsifying family data (Inheritance Certificate) where in the Inheritance Certificate (SKW) it was stated that the heirs of his parents Mrs. P were only 2 (two) people, namely JS and SW, while the other heirs totaling 6 (six) children were not mentioned as heirs of Mrs. P, while SW himself who is currently still alive never knew that his name was listed in the Inheritance Certificate and never signed the Inheritance Certificate. FB also makes Distribution of Inheritance

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<sup>13</sup>Habib Adjie, 2009, Observing the Treasury of Indonesian Notaries and PPATs (Collection of articles on Notaries and PPATs), Citra Aditya Bakti. Bandung, p. 24

<sup>14</sup>Shidarta, 2006. Indonesian Consumer Protection Law, Revised Edition, Gramedia Widiasarana Indonesia, Jakarta, p. 79

Assets dated April 19, 2010 by signing the letter where the contents are considered true another heir, namely SW, as if agreeing, not objecting and allowing the inheritance to be given to his brother named JS, even though the person concerned SW never knew let alone signed the Deed of Distribution of Inheritance Assets. In this case, a violation has occurred, namely the Notary in changing the name of the land certificate in the name of JS used an invalid inheritance certificate because it did not include all the heirs of the testator. This has a fatal impact on the distribution of inheritance, because only one heir controls the entire inheritance of 8 heirs. This happened because in the inheritance certificate only one name of the heir was listed, from this case there was a discrepancy between the inheritance certificate made and the heirs who should have been listed and received the heirs.

Notary AR in this case was sentenced to pay court costs together with the other two defendants amounting to Rp 2,006,000 (two million six thousand rupiah) as per decision No. 85/Pdt.G/2013/PN. Klt. In this case the judge also stated that the certificate of inheritance is invalid. This decision has been appealed with Number 1719/K/Pdt/2015 which in its decision upheld decision number 85/Pdt.G/2013/PN. Klt.

Based on the theory of legal responsibility, Notary AR in this case does not need to be criminally responsible for the legal actions he has committed, but Notary R must pay the court costs together with the other Defendants. Notary AR's liability includes collective liability, because his mistake was caused by another person, namely the Applicant. In this case, the Notary was also less careful in making an authentic deed based on the statements of the appearers.

The principle of responsibility held by a Notary, adheres to the principle of responsibility based on fault of liability, which in making an authentic deed, the Notary must be responsible for the deed he has made. Whether in the deed there is an error or violation that he did intentionally or unintentionally. On the other hand, if the element of error or violation is committed by the parties, then as long as the Notary carries out his obligations in accordance with the UUJN, the Notary Code of Ethics and other regulations, the Notary cannot be held accountable. Because, the Notary only records what has been conveyed by the parties and then the Notary pours what has been



conveyed into the deed. If there is false information made by the parties and later there is a lawsuit, the Notary can be involved in the case and usually the Notary becomes a Co-Defendant.

The violations committed by the notary in this case should be decided by the notary code of ethics, namely Article 2 of the Notary Code of Ethics states that a Notary in carrying out his/her duties is aware of his/her obligation to work independently, honestly and impartially, with a full sense of responsibility, not to establish branch offices, nor to use intermediaries and to use mass media that are promotional in nature. Providing services to the community who need his/her services as well as possible, providing legal counseling and providing his/her services to the underprivileged community free of charge.

The violation committed by the notary in this case is that the notary did not carry out his duties honestly and sided with one of the parties who made the inheritance certificate by not including all heirs who are entitled to receive it in accordance with the inheritance distribution rules applicable in Indonesia. The sanctions that should be applied in this case, the author refers to the rules of positive Indonesian law, namely Article 85 of Law Number 2 of 2014.

The ethical responsibilities of a Notary are related to moral norms which are the measure for a Notary to determine the right or wrong or good or bad of actions taken in carrying out his profession. The responsibility of a Notary himself, if examined from Law Number 30 of 2004 in conjunction with Law Number 2 of 2014 concerning the Position of Notary, is very closely related to the duties and work of a Notary. The responsibility of a Notary is explicitly stated in Article 65 of the UUJN which states that a Notary (Special Substitute Notary and temporary Notary official) is responsible for every deed he/she makes, even though the Notary protocol has been submitted or transferred to the party keeping the Notary Protocol.<sup>15</sup>

As a notary, in making a certificate of inheritance, the notary has the responsibility to ensure that the process of making the letter is in accordance with applicable legal regulations. The notary is responsible for verifying the identity of the individuals involved in the process of making the certificate of inheritance. This also includes ensuring that

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<sup>15</sup>Abdul Gofur Ansohori, 2009, Indonesian Notary Institution, UII Press, Yogyakarta, p. 44.



the parties involved have the authority or right to be part of this process. The notary must ensure that the information contained in the certificate of inheritance is accurate and complete according to the knowledge they have and the information provided by the relevant parties. The notary's responsibility is not to ensure that all heirs are involved in the process, but to ensure that the process of making the certificate of inheritance is carried out legally, in accordance with the rules of law, and by considering the rights and obligations of the parties involved in the process.

### **3.2. Legal Protection for Parties for Making Inheritance Certificates That Do Not Involve All Heirs**

Legal protection is the right of every citizen, and on the other hand, legal protection is an obligation for the state itself, therefore the state is obliged to provide legal protection to its citizens. In principle, legal protection for the community is based on and sourced from the concept of recognition and protection of dignity and dignity as human beings. So that recognition and protection of the rights of suspects as part of human rights without discrimination. Legal protection is all efforts to fulfill rights and provide assistance to provide a sense of security to witnesses and/or victims, which can be realized in forms such as restitution, compensation, medical services, and legal assistance.<sup>16</sup>According to Setiono, legal protection is an action or effort to protect society from arbitrary actions by authorities that are not in accordance with the rule of law, to create order and peace, so as to enable humans to enjoy their dignity as human beings.<sup>17</sup>Satjipto Raharjo stated that legal protection is providing protection for human rights (HAM) that are harmed by other people and this protection is given to the community so that they can enjoy all the rights granted by law.<sup>18</sup>because the nature and purpose of law according to him is to provide protection (protection) to the community, which must be realized in the form of legal certainty. Legal protection is an action that is preventive and repressive.<sup>19</sup>

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<sup>16</sup>Soerjono Soekanto, 1984, Introduction to Legal Research, UI Press, Jakarta, p. 133

<sup>17</sup>Setiono, 2004, Rule of Law (Supremacy of Law), Surakarta, Master of Law Postgraduate Program, Sebelas Maret University, page 3.

<sup>18</sup>Satjipto Raharjo, 2000, Legal Science, Citra Aditya Bakti, Bandung, p. 53

<sup>19</sup>Phillipus M. Hadjon, 1987, Legal Protection for the Indonesian People, Bina Ilmu. Surabaya, p. 2

Legal protection in Indonesia is still weak, such as in the case of inheritance, because there is still a transfer of land rights through inheritance that does not involve all heirs. According to Article 1 Paragraph (1) of the Republic of Indonesia Government Regulation Number 111 of 2000 concerning the Imposition of Land and Building Acquisition Taxes Due to Inheritance and Testamentary Grants, it explains that the acquisition of rights due to inheritance is the acquisition of rights to land and/or buildings for heirs from the testator, valid after the testator dies. When the testator has died, it means that the land rights have been transferred to his heirs.<sup>20</sup>

The law aims to provide legal protection for the community. Philipus M. Hadjon argues that the principle of legal protection for the people against government actions is based on and derived from the concept of recognition and protection of human rights, the birth of concepts on recognition and protection of human rights is directed at restrictions and the placement of obligations on society and government.<sup>21</sup> Legal protection for every Indonesian citizen without exception can be found in the 1945 Constitution of the Republic of Indonesia (UUDNRI 1945), for that every product produced by the legislature must always be able to provide legal protection for everyone, and must even be able to capture the aspirations of law and justice that are developing in society. This can be seen from the provisions governing the equality of legal standing for every citizen.

Repressive protection can be obtained by other heirs through complaints through court lawsuits, both criminal and civil lawsuits. Based on the theory of legal protection, the cancellation of the Certificate of Inheritance by the decision of the Klaten District Court is a form of repressive protection given to other heirs by legislation and law. This is a representation of the function of the law itself to provide justice, order, certainty, benefit and peace.

Legal protection for heirs in disputes over the making of inheritance certificates that do not involve all heirs, apart from receiving

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<sup>20</sup>Puspita Farahdillah, Devi Siti Hamzah Marpaung, Efforts to Resolve Disputes over the Sale and Purchase of Inherited Land Without the Consent of All Heirs Through Mediation, *JUSTITIA: Journal of Law and Humanities*, Vol. 9 No. 1 of 2022, p. 382

<sup>21</sup>Philipus M. Hadjon, 1987, *Protection of the People for the People in Indonesia (a Study of its Principles, Handling by the Courts in the General Court Environment and the Formation of State Administrative Courts)*, Bina Ilmu, Surabaya, p.38

repressive protection, actually also receives preventive protection. Preventive legal protection for land rights holders is by registering the land. Land registration is an administrative activity carried out by the owner of land rights, either in the transfer of rights or the granting and recognition of new rights, the registration activity provides clarity on the status of the land. Land Registration in Article 1 Paragraph 9 of Government Regulation of the Republic of Indonesia Number 18 of 2021 concerning Management Rights, Land Rights, Apartment Units, and Land Registration is a series of activities carried out by the Government continuously, continuously and regularly including the collection, processing, bookkeeping, and presentation and maintenance of physical data and legal data, in the form of maps and lists, regarding land plots, aboveground space, underground space and apartment units, including the provision of proof of rights for land plots, aboveground space, underground space that already have rights and ownership rights to apartment units and certain rights that burden them.<sup>22</sup>

Legal protection for the parties in making a certificate of inheritance that does not involve all heirs is a crucial aspect in the process. The validity of the inheritance document is the main foundation of legal protection, the document must be made in accordance with applicable laws and by a party with legal authority, such as a notary or trusted legal expert. Then, the document must be clear and comprehensive in listing the inheritance being discussed and the parties involved, reducing the possibility of disputes in the future. The parties involved must also provide conscious and full consent to the contents of the document, confirming their understanding of the information contained in the certificate of inheritance. The responsibility of the notary or the party making the certificate of inheritance also has an important role in ensuring that this process is carried out legally and in accordance with applicable laws, providing a strong basis for legal protection for the parties involved.

#### **4. Conclusion**

The notary's responsibility for making a certificate of inheritance that does not involve all heirs is subject to civil liability, criminal liability,

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<sup>22</sup>Musta'in, Sukarmi, Implementation of Land Ownership Certificate Registration in Inheritance Distribution and Its Problems at Semarang City Land Office, *Jurnal Akta*, Vol. 4 No. 2 June 2017, p.136

liability in carrying out his/her position towards the notary and liability for the code of ethics. The notary's responsibility in making a certificate of inheritance is seen depending on what errors are in the Certificate of Inheritance made by the Notary. If the Notary is proven to have made a mistake, the Notary can be fully responsible. The notary's responsibility is not limited to the law alone, but can also be in the form of moral and ethical responsibility, so that in making a certificate of inheritance if the Notary makes a mistake or takes actions that are detrimental to the parties or one of the interested parties, the notary must be morally and ethically responsible or fully responsible. The notary's inheritance Notary AR in this case was sentenced to pay court costs together with the other two defendants amounting to Rp2,006,000 (two million six thousand rupiah) as per decision No. 85/Pdt.G/2013/PN. Klt. In this case, the judge also stated that the certificate of inheritance was invalid. Notary AR's liability includes collective liability, because his mistake was caused by another person, namely the Applicant. In this case, the Notary was also less careful in making an authentic deed based on the statements of the appearers. Legal protection for the parties to the making of a certificate of inheritance that does not involve all heirs is Repressive protection can be obtained by other heirs through complaints through court lawsuits, either criminal lawsuits or civil lawsuits. Based on the theory of legal protection, the cancellation of the Certificate of Inheritance by the decision of the Klaten District Court is a form of repressive protection given to other heirs by legislation and law. This is a representation of the function of the law itself to provide justice, order, certainty, benefit and peace. Legal protection for heirs in disputes over the making of a Certificate of Inheritance that does not involve all heirs, in addition to receiving repressive protection, actually also receives preventive protection. Preventive legal protection for land ownership rights holders is by registering the land.

## **5. References**

### **Journals:**

Abdul Jalal, Suwitno, Sri Endah Wahyuningsih, Involvement of Notary Officials in Unlawful Acts and Participation in Criminal Acts in Document Forgery, *Jurnal Akta*, Volume 5 Number 1 March 2018.

Annisa Aprilianingrum, 2018, Notary's Responsibility for Invalid Heir Certificates in the Perspective of Law Number 30 of 2004 Concerning the Position of Notary in Conjunction with Law Number 2 of 2014 & Notary Code of Ethics, Private Law, Volume 6 Number 1.

Christin Sasauw, Legal Review of the Binding Power of a Notarial Deed, *Lex Privatum Journal*, Volume III Number 1, 2015..

Denny Widi Anggoro, and Miya Savitri, 2016, Normative Legal Review of the Transfer of Land Rights Due to Inheritance According to Government Regulation Number 24 of 1997 Concerning Land Registration, *Journal of Legal Panorama* Volume 1 Number 1, Faculty of Law, Kanjuruhan University of Malang, Malang.

Kunni Afifah, Responsibility and Legal Protection for Notaries in Civil Law Regarding the Deeds They Make, *Lex Renaissance Journal*, Number 1 Volume 2 January 2017.

Maslihan, Sukarmi, Notary's Authority in Making Authentic Deeds Relating to Cooperation Contracts, *Jurnal Akta*, Volume 5 Number 2 March 2018.

Musta'in, Sukarmi, Implementation of Land Ownership Certificate Registration in Inheritance Distribution and Its Problems at Semarang City Land Office, *Jurnal Akta*, Vol. 4 No. 2 June 2017.

Puspita Farahdillah, Devi Siti Hamzah Marpaung, Efforts to Resolve Disputes over the Sale and Purchase of Inherited Land Without the Consent of All Heirs Through Mediation, *JUSTITIA: Journal of Law and Humanities*, Vol. 9 No. 1, 2022.

Rita Permanasari, Akhmad Khisni, Legal Immunity for Notaries Who Reveal Secrets, Position, *Journal of Deeds*, Volume 5 Number 2 March 2018.

#### **Books:**

Abdul Gofur Ansohori, 2009, *Indonesian Notary Institution*, UII Press, Yogyakarta.

Habib Adjie, 2009, *Observing the Treasury of Indonesian Notaries and PPATs (Collection of articles on Notaries and PPATs)*, Citra Aditya Bakti, Bandung.

Phillipus M. Hadjon, 1987, *Legal Protection for the Indonesian People*, Bina Ilmu. Surabaya.

English: Satijipto Raharjo, 2000, *Legal Studies*, Citra Aditya Bakti, Bandung.

Setiono, 2004, *Rule Of Law (Supremacy of Law)*, Surakarta, Master of Law Postgraduate Program, Sebelas Maret University.

Shidarta, 2006. *Indonesian Consumer Protection Law, Revised Edition*, Gramedia Widiasarana Indonesia, Jakarta.

Soerjono Soekanto, 1984, *Introduction to Legal Research*, UI Press, Jakarta.

Tinuk Dwi Cahyani, 2018, *Inheritance Law in Islam*, Muhammadiyah University of Malang, Malang.

Zainuddin Ali, 2010, *Implementation of Inheritance Law in Indonesia*, Sinar Grafika, Jakarta.

**Legislation:**

The 1945 Constitution of the Republic of Indonesia.

Criminal Code.

Civil Code.

Law Number 5 of 1960 concerning Basic Agrarian Principles

Law Number 2 of 2014 concerning Amendments to Law Number 30 of 2004 concerning the Position of Notary.

Government Regulation Number 24 of 1997 concerning Land Registration, Regulation of the Head of the National Land Agency of the Republic of Indonesia No. 3 of 2011 concerning Management of Land Case Studies and Handling.

Presidential Regulation of the Republic of Indonesia Number 20 of 2015 concerning the National Land Agency

Supreme Court Regulation Number 6 of 2018 Concerning Guidelines for Settlement of Governmental Administrative Disputes.

Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency of the Republic of Indonesia Number 21 of 2020 concerning Handling and Settlement of Cases and jurisprudence.

Compilation of Islamic Law