

Responsibility and Legal Protection for Elderly Notaries for Authentic Deeds They Make

R. Ali Nurrachman

Master of Notary Law, Faculty of Law, Universitas Islam Sultan Agung (UNISSULA)
Semarang, Indonesia, E-mail: ralinutrachman@gmail.com

Abstract. *A notary is a public official who has the authority to make authentic deeds that have the force of legal evidence. The problems in this thesis are 1) What are the responsibilities of a notary who has retired for the authentic deeds he has made? 2) What is the form of legal protection for a notary after retirement for the authentic deeds he has made? The aim of this research is to find out and analyze the legal responsibilities and protection for notaries. When a notary has entered retirement, the issue arises regarding the continuation of legal responsibility for the deeds that have been made, and the extent to which legal protection still applies to him. This study aims to analyze the form of legal responsibility of a notary public for authentic deeds that they have made and how legal protection is provided after the term of office ends. Method used in the research This is a sociological legal approach with a descriptive qualitative method. The results of the study indicate that even though the notary's term of office has ended, the responsibility for the deeds made remains attached to him according to the provisions of Article 65 of the UUJN. However, legal protection for retired notaries is not as strong as when they were still active, resulting in a vacuum of norms and potential legal uncertainty. Therefore, a more stringent legal regulation is needed regarding the limits of responsibility and legal protection for notaries after retirement so that legal certainty and justice can be realized.*

Keywords: *Authentic; Legal; Notary; Protection; Responsibility.*

1. Introduction

A Notary carries out his/her office not only for the personal interests of the Notary, but also for the interests of the general public being served. Therefore, in addition to providing guarantees, order and legal protection to the public using Notary services, Notaries also need to be supervised in carrying out the Notary's duties. Another aspect of supervision of Notaries is the aspect of legal protection for Notaries in carrying out the duties and functions that are given and entrusted to them by law, as stated in the point of consideration, namely that Notaries are

certain positions that carry out a profession in legal services to the public and need to receive protection and guarantees in order to achieve legal certainty. In practice, Notaries at all times have the possibility of being faced with matters where they must determine for themselves whether they will use the right of denial granted to them by law or not. Moreover, considering the existence of sanctions in the form of imprisonment or fines, the obligation to pay costs, losses and interest as well as the possibility of dismissal from the position of Notary due to violations of the provisions in Article 4, Article 16 paragraph (1) letter e and Article 54 UUJN, it is only right that Notaries know for sure when notaries can and must exercise their right of recusal.¹

Judging from the provisions of the UUJN, a notary who has retired must still be responsible for the deeds he has made. After a notary is 65 years old, the notary's term of office has expired. A notary who has retired is required to submit the notary's protocol to the notary he has appointed. If the notary does not appoint a replacement notary, the Regional Supervisory Council has the authority to propose another notary as the protocol to the Minister. This explanation is stated in Article 65 of UUJN Number 2 of 2014. The taking of the minutes of the deed must first receive approval from the notary's honorary council. In accordance with Article 66 paragraph (1) of the UUJN, the word approval means that if no approval is obtained, the taking of the minutes of the deed cannot be done, because the minutes of this deed are confidential and it is not easy to take a photocopy of the minutes of the notary's deed and the letters placed on the minutes of the deed.

The provisions of this agreement only apply to notaries who are still in office. Notaries who have retired do not receive legal protection from the Notary Honorary Council, while Notaries who have retired must still be responsible for the deeds they have made in accordance with the explanation in Article 65 of UUJN Number 2 of 2014, but there is no legal protection for them. In addition, there is a lack of clarity in the norms of Article 65 of UUJN Number 2 of 2014 regarding the time limit for the accountability of a notary whose term of office has ended, so that in the end the regulation gives rise to various interpretations.²

The substance of Article 65 of the UUJN must be interpreted that Notaries, substitute Notaries, special substitute Notaries, and temporary notary officials have a time limit for accountability. The time limit for the Notary's accountability is during the performance of his/her duties, until the Notary retires because

¹Makmur. (2013). Analisis Perlindungan Hukum Terhadap Notaris Setelah Berakhir Masa Jabatannya Berdasarkan Undang-Undang Nomor 30 Tahun 2004 Tentang Jabatan Notaris. Universitas Medan Area.

²Karina Prasetyo Putri & Suhariningsih, Bambang Winarno. *Jurnal Ilmiah Prodi Magister Kenotariatan*. Tanggung Jawab Dan Perlindungan Hukum Bagi Notaris Werda Terhadap Akta Yang Pernah Dibuat. Magister Kenotariatan Universitas Barwijaya.

he/she has reached the age of 65 or 67 years, or retires at his/her own request for certain reasons.

If the term of office of a Notary ends in accordance with the provisions of Article 8 paragraph (1) letter d and paragraph (2) of UUJN Number 30 of 2004 in conjunction with UUJN Number 2 of 2014, the Notary's protocol will be transferred to a replacement Notary, who can be appointed by the Notary himself, by the Regional Supervisory Council (MPD), or by the Minister. A Notary who is retiring is required to notify the MPD in writing regarding the end of his term of office and propose another Notary as a replacement for the protocol holder within 180 (one hundred and eighty) days, or no later than 90 (ninety) days before reaching the age of 65 years. Although the protocol of the retiring Notary has been transferred to a replacement Notary, responsibility for the protocol remains with the Notary concerned.³

Notaries have a retirement period because this profession is related to great responsibility in carrying out administrative functions which involve legal and legally binding documents. Overall, the retirement period of a notary is a step to maintain professionalism, quality of service, and fairness in their duties. Legal protection for notaries who have retired includes several aspects such as legal responsibility after the end of their term of office, rights to archives and documents they have created, and protection of their good name. In addition, notaries can still obtain legal protection but it is different from when they were still in office. Legal protection after retirement tends to be more limited.

Based on the background description above, a Notary whose term of office has ended really needs legal protection, so the author is interested in conducting a study analyzing the form of responsibility of a retired notary for deeds that have been made and what form of legal protection a notary gets after retirement for deeds that have been made which will be stated in the form of a thesis with the title: "responsibility and legal protection for retired notaries for authentic deeds they make"

2. Research Methods

This research method uses a sociological legal approach that relies on primary data where the data is used to determine and analyze the responsibility and legal protection for notaries for authentic deeds they make. The specification of this research is descriptive analytical, namely research that only describes the overall condition of the research object by grouping, categorizing according to the research objectives to answer the problems in the research. Data sources and data collection methods use primary data obtained by direct interviews with informants who are considered to understand the research topic and secondary

³Anke Dwi Saputro. (2010). *Jati Diri Notaris Indonesia Dulu, Sekarang, dan di Masa Datang*, Jakarta: PT. Gramedia Pustaka. p. 40

data obtained by reviewing literature related to the research topic. The data obtained are analyzed qualitatively, namely analysis in the form of sentences and coherent, orderly, logical descriptions so that a picture will be obtained to facilitate understanding of the analysis results.

3. Results and Discussion

3.1. not quite enough

The liability of a notary is not limited to their term of office, so that parties who feel aggrieved by a deed made by a retired notary can still file a claim for liability. The liability of a retired notary for a deed they have made does not have a clear time limit. However, in some cases, the liability of a notary can be limited by a time limit determined by law, such as the time limit for filing a civil or criminal lawsuit. The certainty of the Notary's position as an official is very important, because it is related to the legal product produced by the Notary himself, namely in the form of an authentic deed. In addition, it is also to realize the existence of legal certainty related to the Notary's position as an Official.

This notary position is one whose existence is desired by the State. Because it is to realize legal certainty in civil interactions. The concept of legal certainty must be reflected in the practice of state and community life. An interaction, whether public or private, must contain the values of legal certainty and justice. The theory of individual, collective, fault-based, and absolute responsibility according to Hans Kelsen can be applied to the responsibility of a Notary. A Notary is responsible for the mistakes he makes in making an authentic deed, but is not responsible for the substance of the information from the parties involved. The mistakes of the parties involved are not the responsibility of the Notary. Notary mistakes can result in administrative and civil liability, including sanctions such as reprimands, temporary suspensions, or dishonorable discharges.

Therefore, the responsibility towards the Notary cannot be carried out due to the absence of legal certainty that regulates the use of the responsibility of the notary public for the authentic deed he made which was entered by the Notary to protect himself, that legal responsibility towards the Notary does not apply because in the case that the author raised there is no legal certainty that regulates, as the theory of responsibility put forward by Hans Kelsen who classifies responsibility into several parts, namely:

- 1) Individual responsibility means that an individual, in this case a notary, is responsible for the violations he/she commits.
- 2) Collective liability means that it is imposed on the notary for violations or legal errors committed by other people working under his supervision or within his scope of responsibility, such as notary office employees, notary assistants, or administrative staff, even though the notary did not directly commit the act

- 3) Liability based on fault means that the notary is responsible for violations he/she committed intentionally and with the intention of causing loss;
- 4) Absolute liability in this case is explained as meaning that the notary can still be held legally responsible for the legal consequences of the deeds he makes.

The above errors are elements that are contrary to the law. The responsibility of a notary arises if there is an error made in carrying out his/her duties and the error causes a loss to the person requesting the notary's services. Unlawful acts by a notary are not only acts that directly violate the law, but also acts that directly violate other regulations, namely regulations that are within the scope of morality, religion, and good manners in society.⁴ The responsibilities of a notary are regulated by law, specifically Article 65 and Article 66, which explain the obligations and legal protection for notaries after retirement. Article 65 of the UUJN states that a notary who has retired remains responsible for the deeds he has made during his term of office. This responsibility includes the validity, authenticity, and accuracy of the information contained in the deed.

This article emphasizes that the notary's responsibility does not end when they retire. This is important to provide legal protection for the parties involved in the notarial deed. Based on this provision, parties who feel disadvantaged by the deed made by the retired notary can still demand accountability.

Article 66 of the UUJN states that notaries who have retired no longer receive the same legal protection as when they were still in office. However, deeds made by a notary during their term of office remain legally binding. Notaries are responsible for ensuring that the deeds made meet all applicable legal requirements. This includes checking the identities of the parties, ensuring that the agreements made do not conflict with the law, and fulfilling all necessary formalities. Notaries are also responsible for the accuracy of the information contained in the deed. If there are errors or misleading information, the notary can be held accountable.

Notaries who have retired can face legal risks if there are parties who feel aggrieved by the deeds that have been made. They can be sued in court to be held accountable for the deeds. Therefore, it is important for notaries to maintain the integrity and accuracy of the deeds made during their term of office. Responsibility that drives notaries to act ethically and professionally during their term of office. They must ensure that all deeds made meet legal requirements and do not contain misleading information. This is important to maintain public trust in the notary profession.

⁴R. Wirjono Prodjodikiro. (2000). *Perbuatan Melanggar Hukum dipandang dari sudut Hukum Perdata*, Bandung: Mandar Maju.p. 6

Likewise, sanctions aimed at notaries, this is solely a form of awareness to notaries that in the responsibility of a notary who has retired for the deeds he has made includes the validity of the deed, the truth of the information, protection for third parties, the obligation to store documents, and legal risks. Although no longer active, a retired notary still has significant responsibility to ensure that the deeds that have been made remain valid and can be accounted for.

3.2. protection

Notaries, as public officials, are required to provide legal services to the public in carrying out their profession and position, and to fulfill the obligations stipulated by law to ensure the achievement of legal certainty and protection. As public officials, notaries have the authority to make authentic deeds that function as valid evidence. The authentic deeds include all actions, agreements, and decisions required by laws and regulations. In addition to the obligations stipulated in the law, notaries also have the authority to provide counseling related to the making of deeds. In addition, notaries are responsible for the position they hold, in accordance with the provisions contained in the Notary Law (UUJN). Lawsuits against notaries are usually limited to deeds that have been made during their term of office. If the deed meets the legal requirements and does not contain elements of fraud or intentional error, notaries can have arguments to defend themselves.

The explanation in Article 65 of UUJN Number 2 of 2014 contains vague norms regarding the time limit for accountability for notaries who are no longer in office. The article does not specifically explain the end of the time limit for accountability for notaries for deeds that have been made, so the article does not have legal certainty. Notarial deeds in the form of minutes of the deed are kept by the holder of the notarial protocol, even though the notarial protocol has been submitted to another notary, it does not mean that the notary who is no longer in office is free from his responsibility for the deeds.⁵

Explanation of Article 66 of UUJN Number 2 of 2014 confirms that after a notary retires, they no longer receive the same legal protection as when they were still active. This means that a notary retires can face lawsuits related to the deeds they have made, and they are no longer protected by the legal provisions that apply to active notaries. Logically, it is difficult to accept if a notary is sued in relation to a deed made before or by a notary, because the notary's duty is to make a deed in accordance with the wishes of the parties for a particular legal action and provide legal advice regarding the deed. The contents of the deed

⁵Karina Prasetyo Putri & Suhariningsih, Bambang Winarno. Tanggung Jawab Dan Perlindungan Hukum Bagi Notaris Werda Terhadap Akta Yang Pernah Dibuak (Analisis Pasal 65 dan Pasal 66 Undang-Undang Nomor 2 Tahun 2014 tentang Perubahan Atas Undang-Undang Nomor 30 Tahun 2004 tentang Jabatan Notaris). Fakultas Hukum Universitas Brawijaya. Malang.

fully reflect the wishes and statements of the parties involved. This article only applies to notaries who are still active, this article does not apply to notaries who are retired. This means that there is no legal protection for notaries who are retired, even though they are still responsible for the deeds they have made. Notaries who are retired do not receive distributive justice, namely equal rights, because they lose the legal protection related to their position, even though they still have responsibility for the problematic deed. The responsibility of the Notary's position applies only while he is in office, and after his term of office ends, he is not responsible for actions related to that position.⁶

Legal protection in the Notary Law applies as long as the Notary is still in office. After his term of office ends, there are no provisions that provide legal protection for Notaries. Therefore, Notaries cannot be held responsible for losses arising from the making of deeds, as long as the assistance provided is in accordance with legal provisions and is carried out with reasonable care. Legal protection for retired notaries involves several aspects that aim to ensure that their rights are maintained after the term of office ends. The following are several forms of legal protection for retired notaries:

- 1) Pension Rights Grant: Notaries who have retired are entitled to receive a pension or allowance after their service period ends, in accordance with applicable provisions. This is a form of financial protection provided to support the notary's life after no longer practicing his profession.
- 2) Protection against Legal Liability: Despite his retirement, a notary is still protected against legal liability related to deeds made during his term of office, as long as the act is valid and in accordance with the provisions of the applicable law at that time. A notary cannot be personally blamed for problems arising from a valid and authorized deed.
- 3) Guarantee Against Abuse of Authority: If there is a claim of abuse of authority that occurs after the term of office ends, legal protection for notaries can include legal defense provided by notary professional organizations or professional insurance that they have. This aims to protect the integrity and reputation of notaries after the term of office.
- 4) Notaries who are retired can be protected from lawsuits related to deeds made during their term of office, provided that they are not involved in any misuse or unlawful acts.
- 5) After retirement, notaries usually remain members of a notary professional organization that provides support, protection and legal advice in the event of legal problems related to deeds made during their term of office.

⁶Iva Qohari. (2022). *Pertanggungjawaban Notaris Setelah Masa Jabatannya Berakhir Terhadap Semua Akta Yang Pernah Di Buat*. Malang: Magister Kenotariatan Universitas Islam Malang.

This legal protection aims to maintain the honor of the notary profession and provide a sense of security to notaries who have served, while still paying attention to their legal obligations and professional responsibilities. The main idea related to the possibility of errors made by notaries is to distinguish between personal errors and errors in carrying out their duties. For personal errors, the mechanism is the same as for the general public, where notaries can be held accountable and receive the same legal protection as ordinary people. However, for errors related to the duties of a notary, there must be a different legal protection mechanism, even though the notary has retired. The existence of a notary protection organization functions as a filter for the authorities in terms of confiscating photocopies of minutes of deeds and in handling cases that are not relevant to the duties of a notary. Legal protection for notaries is very important for:

- a. Maintain the honor and dignity of his/her position, including when giving testimony and participating in the examination and trial process.
- b. Maintaining the confidentiality of information in the deed to protect the interests of the parties concerned.
- c. Ensure proper storage of minutes, letters related to deed minutes, and notary protocols.

Therefore, referring to one of the legal protection theories put forward by Prof. Dr. Philipus M. Hadjon, SH, it is stated that even though they have retired, retired notaries still have the potential to face questions or lawsuits over deeds that the notary made while still in office. From the perspective of the legal protection theory, it is stated that limiting the Notary's liability for deeds made based on the statute of limitations for prosecution provides legal certainty and protects the Notary. This limitation is important to maintain justice and ensure the security and peace of the Notary's life after retirement. The statute of limitations for prosecution is a form of preventive legal protection, because it provides legal certainty and guarantees against misuse of lawsuits that can occur years after the notary's term of office ends.

Meanwhile, for repressive legal protection, if a dispute occurs, the resolution must consider that his responsibility is limited only to the active term of office, and does not cover matters beyond his authority. Thus, it will be more secure if every act of summons, examination, and detention is carried out after obtaining permission from the professional organization that examines first. This will create legal certainty for the community, in accordance with the principle of trust that underlies the authority of a notary. The importance of legal protection for notaries is to maintain the dignity and honor of their position, including when giving testimony and taking part in examinations and trials, keeping the information in the deed confidential in order to protect the interests of the

parties involved in the deed, and maintaining the minutes or letters attached to the minutes of the deed, as well as the notary protocol in storing them.

There is no clear and comprehensive law in Indonesia that protects notaries when carrying out their duties. However, by knowing the development of existing laws, notaries will be more careful in carrying out their duties so that they are not easily fooled by bad witnesses. Regarding understanding the relevant and relevant laws on notary, errors in making deeds will be minimized. Deeds made by notaries will be considered authentic and can be defended in and out of court.⁷

3.3. Efforts if there is no legal protection from a notary after werda for an authentic deed.

The term notary werda refers to a notary who is no longer in office, usually retired. Although the notary has retired, his responsibility for the deeds he made is not immediately lost. In general, the protection of notaries, including those who have retired, is regulated in the UUJN. If a notary werda faces a lawsuit or legal report, several steps can be taken:

1) Examination and Defense of Notary Protocols

- a. Even though the protocol has been submitted, the Notary has the right to access and re-examine the protocol of the deed in question. This is crucial to prepare a defense based on the facts and data in the archive.
- b. Notary Werda Focuses on proving that the deed-making process is in accordance with UUJN and related regulations at the time the deed was made.

2) Requesting Assistance from the Indonesian Notary Association (INI)

- a. Protection from INI as a professional organization has an obligation to protect its members, including Notaries. Notaries can request legal assistance, consultation, or even advocacy assistance from INI.
- b. Contributions from INI can also provide moral support and a network of fellow Notaries who may have faced similar situations.

3) Engaging Professional Legal Advisors/Advocates

- a. Involve advocates who have special expertise and experience in the field of notary law. They will understand the ins and outs of UUJN, the Notary code of ethics, and related jurisprudence.

⁷Innaka Dewi Indra. (2019). Penerapan Asas Praduga Sah Terhadap Akta Notaris Dengan Adanya Figur Palsu (Studi Kasus Putusan Pengadilan Tinggi Banda Aceh Nomor 43/Pdt/2017/Pt.Bna). Tesis.

b. Defense strategy through an Advocate who will help develop an effective defense strategy, including legal arguments regarding the time limit for liability (expiration), absence of malicious intent, or proof that there was no fatal negligence on the part of the Notary.

4) Legal Arguments on the Time Limitation of Liability

a. Although Article 65 of the UUJN does not limit the time, an argument can be made based on the principles of justice and legal certainty that the Notary's liability cannot last a lifetime.

b. An analogy can be used with the statute of limitations in civil law (e.g. 30 years) or the statute of limitations in criminal prosecution as a reasonable limitation.

5) The Role of the Notary Honorary Council (MKN) and the Notary Supervisory Council (MPN)

Although the MKN/MPN focuses more on active Notaries, in some cases they can provide views or clarifications regarding legal and ethical issues involving Notaries, especially when it comes to professional integrity or submission of protocols. However, it should be noted that the MKN/MPN is not authorized to try civil or criminal cases.

Notaries always maintain their dignity both when working and when in the midst of society. This leads them to a choice that notaries are prohibited from making mistakes in carrying out their duties and positions, prohibited from trying to break the law or committing inappropriate acts in terms of job ethics and community morals.

But no matter how obedient, there are still Notaries who are "taken" to the law. Whether because they made a mistake, or accidentally, or even because they were not guilty at all and had followed the procedure.⁸ Before making an authentic deed, a notary always pays attention to the wishes of the parties and provides them with good legal advice. If a notary has provided good legal advice, their chances of being sued in a civil court are reduced. Because the notary does not carry out the duties stipulated by the Notary Law and there are parties who feel aggrieved by the rights they previously had, the notary can be sued to provide compensation for unlawful acts, because the notary does not carry out his obligations stipulated by the Notary Law and there are parties who feel their rights have been violated which were not previously given any explanation by

⁸Agus Wijayanto. Journal. Legal Protection Against Criminalization of Notaries in Carrying Out Their Duties and Functions as Public Officials Based on Law Number 2 of 2014 Concerning the Position of Notaries. Sultan Agung Islamic University: Semarang. 2017. Page 793

the notary. It is stated that the role of a notary can provide guidance and provide services in a balanced manner.⁹

Currently, retired or *werda* Notaries are still burdened with legal responsibility for deeds they made decades ago, without any clear time limit. It is like a long shadow that continues to follow them, even though they have finished serving. We need clear and firm changes in the UUJN. Article 65 must be revised to set a reasonable and fair time limit for how long a *werda* Notary is responsible. So, the point is to provide a reasonable 'expiration date' for the Notary's accountability after they retire, so that they can retire in peace and the Notary profession continues to run with integrity.

4. Conclusion

Based on the results of the research and analysis above, the author can draw conclusions from this writing, including the following: Notaries as public officials already have a clear basis and guidelines that regulate the position of a Notary, namely the Notary Position Law Number 2 of 2014. Notaries are responsible for ensuring that deeds made meet all applicable legal requirements. Notaries who have retired remain responsible for the deeds they have made, including the validity of the deed, the truth of the information, protection for third parties, the obligation to store documents, and potential legal risks. Even though they are no longer active, retired notaries remain responsible for ensuring that deeds that have been made remain valid, accurate, and accountable. Legal protection for retired notaries for authentic deeds that have been made includes several important aspects, such as the legal force of the deed, ongoing responsibility, protection against lawsuits, and the obligation to store documents. Until now, the law governing notaries is still unclear, UUJN is considered lacking because most of its article burden both active and retired notaries. Although retired notaries no longer receive the same legal protection as when they were still active, the deeds that have been made still have legal force and can be used as evidence. Therefore, retired notaries must still maintain the integrity and accuracy of the deeds that have been made and fulfill the obligation to store documents to ensure accessibility in the future.

5. References

Journals & Thesis:

Agus Wijayanto. (2017). *Perlindungan Hukum Terhadap Kriminalisasi Notaris Dalam Menjalankan Tugas Dan Fungsinya Sebagai Pejabat Umum*

9I Made Sarjana. *Notary Journal: Limitation of Exoneration Clause*, (Bali: Udayana University. 2016). Page 123

Berdasarkan Undang Undang Nomor 2 Tahun 2014 Tentang Jabatan Notaris.

Univeristas Islam Sultan Agung : Semarang. *Jurnal*.

I Made Sarjana. (2016). Pembatasan Klausula Eksonerasi, Bali : Universitas Udayana. *Jurnal Notaril*.

Innaka Dewi Indra. (2019). Penerapan Asas Praduga Sah Terhadap Akta Notaris Dengan Adanya Figur Palsu (Studi Kasus Putusan Pengadilan Tinggi Banda Aceh Nomor 43/Pdt/2017/Pt.Bna). *Tesis*.

Iva Qohari. (2022). Pertanggungjawaban Notaris Setelah Masa Jabatannya Berakhir Terhadap Semua Akta Yang Pernah Di Buat, Malang: Magister Kenotariatan Universitas Islam Malang.

Karina Prasetyo Putri & Suhariningsih, Bambang Winarno. Tanggung Jawab Dan Perlindungan Hukum Bagi Notaris Werda Terhadap Akta Yang Pernah Dibuat (Analisis Pasal 65 dan Pasal 66 Undang-Undang Nomor 2 Tahun 2014 tentang Perubahan Atas Undang-Undang Nomor 30 Tahun 2004 tentang Jabatan Notaris). Fakultas Hukum Universitas Brawijaya. Malang.

Makmur. (2013). *Analisis Perlindungan Hukum Terhadap Notaris Setelah Berakhir Masa Jabatannya Berdasarkan Undang-Undang Nomor 30 Tahun 2004 Tentang Jabatan Notaris*. Universitas Medan Area.

Books:

Anke Dwi Saputro. (2010). *Jati Diri Notaris Indonesia Dulu, Sekarang, dan di Masa Datang*, Jakarta: PT. Gramedia Pustaka.

R. Wirjono Prodjodikiro. (2000). *Perbuatan Melanggar Hukum dipandang dari sudut Hukum Perdata*, Bandung: Mandar Maju.