

Responsibilities of Officials Making Land Deeds (PPAT) in Making a Deed of Sale and Purchase of Land Which is Void Law in Pekalongan Regency

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Abstract. *A Land Deed Official is a public official tasked with carrying out part of the land registration process by creating authentic deeds as evidence of certain legal acts concerning land rights or apartment ownership rights. Currently, in practice, Land Deed Officials (PPAT) often create sales and purchase agreements that do not comply with applicable regulations, resulting in losses for the parties involved. The objectives of this study are to analyze: 1) The responsibility of Land Deed Making Officials (PPAT) for deeds they have made that are declared null and void by law in Pekalongan Regency. 2) The mechanism for implementing court decisions as a form of responsibility of Land Deed Making Officials (PPAT) for deeds that are null and void by law in Pekalongan Regency. This type of research is included in empirical legal research. The approach method in this research is the empirical juridical approach. The type and source of data in this research are secondary data and primary data, obtained from observation and interviews. The analysis in this research is descriptive qualitative. The results of the research concluded: 1) Land Deed Making Officials (PPAT) who make deeds that are declared null and void by law can be subject to administrative, civil, and criminal sanctions. The Land Deed Making Officials (PPAT) can also be sued for compensation by the party who feels aggrieved. 2) Land Deed Making Officials (PPAT) follow the procedures for implementing court decisions, if the Court's decision against the Land Deed Making Officials (PPAT) is declared incorrect, an appeal can be filed. However, if the Court's decision states that the Land Deed Making Officials (PPAT) are guilty, then the Land Deed Making Officials (PPAT) can be subject to criminal or civil sanctions.*

Keywords: PPAT; Responsibility; Void by Law.

1. Introduction

The obligation to register land is regulated by Law Number 5 of 1960 concerning Basic Agrarian Regulations (UUPA) and Government Regulation Number 24 of 1997 concerning Land Registration.¹Technically, the land registration process is carried out by the Government, namely the National Land Agency (BPN), by issuing a product that guarantees legal certainty from the Land Rights registration process, namely a certificate of proof of rights in the form of a Land Rights Certificate.² The consequence of land registration is the transfer of land or building rights, or the initial registration. The transfer of land rights does not automatically transfer the rights; rather, it must be proven by authentic written evidence, known as an authentic deed. A deed can be considered authentic if it meets the requirements stipulated by law and is drawn up by an authorized public official and has binding force. Buying and selling is a legal act that requires the role of a PPAT based on Article 1457 of the Civil Code which states that buying and selling is an agreement, in which one party binds himself to hand over an object and the other party pays the agreed price.³As stated in Article 37 Paragraph 1 of 1997, it states that the transfer of Land Rights, including sales and purchases, must be registered before a Notary or Land Deed Making Officer (PPAT).⁴A Deed of Sale and Purchase made and signed before a Land Deed Making Officer (PPAT) proves that a legal act of transferring rights to a piece of land has been carried out and is accompanied by payment of the price, and proves that the recipient of the rights or buyer has become the new rights holder by having proof of ownership of the land.⁵

According to Law Number 5 of 1960, Article 19 paragraph (2) sub states that the government's duties and authorities in land registration can be divided into two functions, namely:

- a. Land Rights Registration, namely the first registration of rights or their recording in the land book;
- b. Registration of transfer of land rights. Land registration aims to provide legal clarity, in this case PPAT has a very important role.

As public officials authorized to issue land deeds, Land Deed Officials (PPATs) are required to possess specialized knowledge and expertise in the land sector, specifically in accordance with the Basic Agrarian Law (hereinafter referred to as UUPA). This is part of the government's duties and authority in the field of land

¹Indonesia, Government Regulation on Land Registration, PP No. 24 of 1997, LN No. 59, TLN No. 3696, Article 3

²Mhd. Yamin Lubis & Abd. Rahim Lubis, (2012), *Hukum Pendaftaran Tanah*, Bandung : Mandar Maju, p. 106.

³Soedharyo Soimin, (2008), *Status Hak dan Pembebasan Tanah*, Jakarta : Sinar Grafika, p. 86.

⁴Adrian Sutedi, (2014), *Peralihan Hak Atas Tanah dan Pendaftarannya*, Jakarta : Sinar Grafika, p. 7.

⁵Baharudin, (2014), Kewenangan Pejabat Pembuat Akta Tanah (PPAT) Dalam Proses Jual Beli Tanah, *Jurnal Keadilan Progresif*, Vol. 5, Nomor 1, p. 91, <https://jurnal.ubl.ac.id/index.php/KP/article/view/441> accessed on 10 August 2024 at 10.00 WIB

registration. In Article 1 paragraph (1), paragraph (2), paragraph (3) of Government Regulation Number 24 of 2016 concerning Amendments to Government Regulation Number 37 of 1998 concerning Regulations on Land Deed Making Officials in conjunction with Article 1 paragraph (1), paragraph (2), paragraph (3) of Regulation of the Head of the National Land Agency of the Republic of Indonesia Number 23 of 2009 concerning Amendments to Regulation of the Head of the National Land Agency of the Republic of Indonesia Number 1 of 2006 concerning Provisions for Implementation of Government Regulation of the Republic of Indonesia Number 37 of 1998 concerning Regulations on Land Deed Making Officials (PPAT), PPAT has been divided into 3 (three) groups, namely:

- a. Land Deed Making Official, hereinafter referred to as PPAT, is a public official who is given the authority to make authentic deeds regarding certain legal acts regarding land rights or Ownership Rights for Apartment Units.
- b. Temporary PPAT is a Government Official appointed due to his position to carry out the duties of PPAT by creating PPAT data in areas where there are not enough PPATs.
- c. Special PPAT is an official of the National Land Agency who is appointed because of his position to carry out the duties of a PPAT by making certain special PPAT deeds in the context of implementing certain government programs or tasks.

Land Deed Making Officials are appointed by the government, in this case the National Land Agency, with certain duties and authorities in order to serve the community's needs for deeds of transfer of land rights, deeds of encumbrance of Land Rights, and deeds of granting authority to encumber mortgage rights as regulated in the applicable laws and regulations. In the development of land registration in Indonesia, the position of PPAT as a public official is confirmed through various laws and regulations, namely:

- a. Law Number 4 of 1996 concerning Mortgage Rights on land and objects related to land. Article 1 paragraph (4) states: "Public officials who are authorized to make deeds of transfer of land rights, deeds of encumbrance of land rights and deeds of granting power of attorney to encumber mortgage rights according to applicable laws and regulations."
- b. Government Regulation Number 24 of 1997 concerning land registration, Article 1 number 24 states that PPAT is: "Public officials who are authorized to make land deeds."
- c. Government Regulation Number 37 of 1998 concerning the Regulations on the Position of Land Deed Making Officials, is specifically regulated in Article 1 point 1, which reads: "The Land Deed Making Officer is a public official who is authorized to make authentic deeds regarding certain legal acts regarding Land Rights or ownership rights to apartment units."

In addition, as stated in Article 2 of Government Regulation Number 37 of 1998 concerning the Regulations on the Position of Land Deed Making Officials, it is stated as follows:⁶

- 1) The PPAT has the main task of carrying out some land registration activities by making deeds as evidence that certain legal acts have been carried out regarding Land Rights or Ownership Rights for Apartment Units, which will be used as the basis for registering changes to land registration data resulting from these legal acts.
- 2) The legal acts as referred to in paragraph (1) are as follows:
 - a. Buy and sell;
 - b. Exchange
 - c. Grant;
 - d. In-breng into the company;
 - e. Distribution of joint rights;
 - f. Granting of building use rights/use rights over freehold land
 - g. Granting of mortgage rights;
 - h. Granting power of attorney to impose mortgage rights.

The Deed of Sale and Purchase made by the PPAT must not contain legal defects, because it can interfere with the process of issuing land certificates to the rights owner. The Sale and Purchase Deed that is drawn up must be in accordance with the legal documents brought by the Applicants and the PPAT is obliged to examine the veracity of these documents. The Land Deed Making Officer as a public official is required to be meticulous in carrying out his duties, so he should be careful in examining the formal truth of the documents brought to him. The Land Deed Making Officer is also required to be honest, namely honest to himself, the community, and God in carrying out his duties. The Land Deed Making Officer is also required to carry out his obligations in good faith and in accordance with the applicable code of ethics, as stated in Article 3 letter f of the Land Deed Making Officer Code which requires a Land Deed Making Officer to be responsible, honest, and impartial and Article 4 letter r Number 1 where the Land Deed Making Officer is prohibited from carrying out actions that violate the provisions in the Land Deed Making Officer Regulations and other statutory provisions related to the main duties of the Land Deed Making Officer.⁷

2. Research Methods

This research is normative legal research. The approach used is a statute approach. The data used is secondary data sourced from primary, secondary, and tertiary

⁶Government Regulation Number 37 Article 2 of 1998 concerning the Regulations on the Position of Land Deed Making Officials

⁷Yovita Christian Assikin et al., (2019), "Tanggung Jawab Pejabat Pembuat Akta Tanah Berkaitan Dengan Dibatalkan Akta Jual Beli Ditinjau Dari Peraturan Perundang-Undangan Yang Berlaku", *Jurnal Ilmu Hukum Kenotariatan*, Fakultas Hukum Unpad, Volume 3, Nomor 1, p. 94. <https://jurnal.fh.unpad.ac.id/index.php/akta/issue/view/14> accessed on 20 December 2024 at 13.00 WIB.

legal materials. The data collection method uses library research (document study). The analysis used is prescriptive. The research approach used in this thesis is an empirical juridical research method. The empirical juridical approach is an effort to gain clarity and understanding of the problem based on existing reality or case studies.³⁵ The specifications of this research use qualitative descriptive, namely the data obtained is analyzed by searching for and determining the relationship between the data and the problems raised in the research.³⁹ Data sources come from primary data and secondary data. Data collection methods include interviews, document studies or library materials. The data analysis method used in analyzing the data is qualitative analysis.

3. Results and Discussion

3.1. The Responsibility of the Land Deed Making Officer (PPAT) for the Deed he made is declared null and void by law in Pekalongan Regency.

The Land Deed Making Officer is a general official whose duty is to carry out some land registration activities by making authentic deeds as evidence that certain legal acts have been carried out regarding land rights or Property Rights for Apartment Units. Buying and selling is a legal act that requires the role of a PPAT based on Article 1457 of the Civil Code which states that buying and selling is an agreement, in which one party binds himself to hand over an object and the other party pays the agreed price.⁸As stated in Article 2 paragraph (2) of Government Regulation Number 37 of 1998 in conjunction with Article 37 paragraph (1) of Government Regulation Number 24 of 1997, that in carrying out the legal act of buying and selling, it must be done before a PPAT by making a deed of buying and selling.⁸⁵ A Deed of Buying and Selling made and signed before a Land Deed Making Officer (PPAT) proves that a legal act of transferring rights to a piece of land has been carried out and is accompanied by payment of the price, and proves that the recipient of the rights or buyer has become the new rights holder by having proof of ownership of the land.⁹

The Deed of Sale and Purchase made by the PPAT must not contain legal defects, because it can interfere with the process of issuing land certificates to the rights owner. The Sale and Purchase Deed that is drawn up must be in accordance with the legal documents brought by the Applicants and the PPAT is obliged to examine the veracity of these documents. The Deed of Sale and Purchase made by the PPAT must not contain legal defects, because it can interfere with the process of issuing land certificates to the rights owner. The Sale and Purchase Deed that is drawn up must be in accordance with the legal documents brought by the Applicants and the PPAT is obliged to examine the veracity of these documents.

⁸Soedharyo Soimin, (2008), *Status Hak dan Pembebasan Tanah*, Jakarta : Sinar Grafika, p. 86.

⁹Baharudin, (2014), "Kewenangan Pejabat Pembuat Akta Tanah (PPAT) Dalam Proses jual Beli Tanah", *Jurnal Keadilan Progresif*, Vol. 5 Nomor 1, p. 91.

The Deed of Sale and Purchase is categorized as a Partial Deed or Party Deed (*Partij Akten*), which states the desire of the parties to bind themselves to each other so that a legal sale and purchase of the desired object can occur. Therefore, before the Deed of Sale and Purchase is made, it must be based on an agreement between the parties before being written down in the form of a deed based on the valid conditions of the agreement stated in Article 1320 of the Civil Code, then the PPAT can continue in making the deed of sale and purchase, of course, by continuing to follow the provisions of legislation and codes of ethics so that the deed is valid and has perfect evidentiary power in court. The consequences of a nullity are in principle the same whether it is null and void, revocable or non-existent, namely all three result in the legal act being invalid or the legal act having no legal consequences. or the absence of something essential/main in the agreement. So, reviewed from the cause, null and void is due to the failure to fulfill objective requirements, as well as the failure to fulfill the conditions that are essential in the agreement and the failure to fulfill the formal form as required by applicable laws/provisions which is called non-existent void. The difference is:¹⁰

- a. Void by law, as a result of which the legal act carried out has no legal consequences since the legal act occurred, in practice void by law is based on a court decision that has permanent legal force;
- b. Can be cancelled, as a result of which the legal act carried out has no legal consequences since the cancellation occurred and where the cancellation or ratification of the legal act depends on a certain party, which causes the legal act to be cancelled. A deed whose sanction can be cancelled remains valid and binding as long as there is no court decision that has permanent legal force that cancels the deed;
- c. *Non-existent*, as a result of which the legal act carried out does not exist, which is caused by the failure to fulfill the essentials of an agreement or not fulfilling one or all elements in a particular legal act. *Non-existent* sanctions dogmatically do not require a court decision, but in practice a court decision is still required which has permanent legal force in its implications the same as being null and void.

Basically, when an authentic deed is declared null and void by law, it means that the deed is deemed not to exist and cannot be applied. The Land Deed Making Officer (PPAT) numbering for the deed remains, but the Court's decision regarding the deed must be attached to the PPAT's archive.¹¹With the cancellation of the Deed of Sale and Purchase by a court decision, the Deed of Sale and Purchase is deemed to have never existed, and all legal actions taken regarding the Deed of Sale and Purchase are returned to their original state, as if the Deed of Sale and Purchase had not yet been made. This certainly causes losses to both the parties

¹⁰Mulyoto, (2012), *Perjanjian (Teknik, cara membuat, dan hukum perjanjian yang harus dikuasai*, Yogyakarta : Cakrawala Media, p. 45.

¹¹Interview with Sugiyanto, SH, M.Kn., Notary in Pekalongan Regency, on December 16, 2024.

concerned, third parties, and the Land Deed Official (PPAT) himself. These losses are grouped into two groups: material losses and immaterial losses. Material losses are losses that are actually suffered and can be calculated based on the nominal amount of money, so that when material demands are granted in the judge's decision, the assessment is carried out objectively.

The accountability required of PPAT as a public official authorized to make land deeds, is not only in the narrow sense of making the deed, but also in the broad sense, namely responsibility during the deed phase and responsibility after the deed is signed. The professional responsibility of PPAT can be categorized into 2 (two) things, namely ethical responsibility and legal responsibility. This legal responsibility can also be divided into 3 (three) types, namely responsibility based on administrative law, civil law, and criminal law.

1) Criminal Responsibility of PPAT

A criminal act is an act that is prohibited by a legal regulation, where the prohibition is accompanied by sanctions or threats in the form of certain criminal sanctions for those who violate it.

2) Civil Responsibilities of PPAT

Notaries have civil liability if they commit violations in carrying out their duties. These violations can include unlawful acts, negligence, or errors in drafting a deed that result in harm to another party. This civil liability can include an obligation to provide compensation to the injured party.

3) Administrative Responsibilities of PPAT

Notaries are subject to administrative responsibility if they commit violations in the performance of their duties. Administrative sanctions can include verbal warnings, written warnings, temporary suspension, or dishonorable discharge. These violations can occur if a notary fails to fulfill their obligations or violates statutory provisions regarding the preparation of deeds.

3.2. The mechanism for implementing court decisions as a form of responsibility of the Land Deed Making Officer (PPAT) regarding deeds that are cancelled by law in Pekalongan Regency.

PPAT is defined as a public official who is authorized to make authentic deeds regarding certain legal acts regarding land rights or ownership rights to apartment units.¹² PPAT as one of the public officials who has an important role in ensuring legal certainty, order and legal protection through authentic deeds made by and before him, then the authentic deed is a strong evidence and if a dispute occurs in Court unless it can be proven to be untrue, so that the Notary/PPAT deed provides perfect proof as stated in Article 1870 of the Civil Code to the parties who made it.

¹²Urip Santoso, (2016), *Pejabat Pembuat Akta Tanah (Perspektif Regulasi, Wewenang dan Sifat Akta)*, Jakarta : Prenadamedia Group, p. 61.

If a dispute occurs regarding the deed, the deed can be canceled or nullified by law.

The mechanism for enforcing a court decision regarding the PPAT's liability for a deed that has been legally annulled involves several steps, starting with filing a lawsuit, proceeding to trial, and finally executing the decision. If the deed is annulled by the court, the PPAT may be held accountable for administrative, civil, and/or criminal matters. The following are the steps in the mechanism for enforcing a court decision regarding the PPAT's liability:

- 1) Filing a Lawsuit: A party who is harmed because the deed made by the PPAT is declared null and void by law can file a lawsuit in court.
- 2) Trial: The court will conduct an examination, including examining witnesses, experts and other relevant evidence to prove any errors or negligence on the part of the PPAT.
- 3) Court Decision: If the court finds an error or negligence by the PPAT, the court can issue a decision stating that the deed is null and void and the PPAT is responsible.
- 4) Execution of the Decision: The injured party may file for the execution of the court decision to obtain compensation or other sanctions imposed on the PPAT.

In addition, the PPAT is obliged to implement the court decision, which may include:

- a. Correction of Deed: If the decision states that the deed contains errors or deficiencies, the PPAT can be ordered to make corrections in accordance with the court decision.
- b. Cancellation of Deed: If the deed is declared null and void by law, the PPAT can be ordered to carry out cancellation actions in accordance with applicable legal provisions.
- c. Other Actions: The court decision may also order the PPAT to take other actions deemed necessary, for example providing an explanation to the injured party.

Land Deed Making Officials (PPAT) who are found guilty by the court, such as defendants, have the right to appeal against the decision of the first instance court. PPATs who are dissatisfied with the decision of the first instance court can file an appeal (cassation) to a higher court (High Court/Supreme Court) to request a review of the decision. This appeal is a right guaranteed in Article 67 of the Criminal Procedure Code, this right to appeal has a time limit, namely 7 days after the decision is issued, as regulated in Article 233 paragraph (2) of the Criminal Procedure Code. If the PPAT or public prosecutor files an appeal, then the decision

of the first instance court does not yet have permanent legal force and cannot be implemented.¹³

Apart from appeals, PPAT can also submit other legal remedies such as judicial review (PK) or pardon, depending on the type of case and applicable legal provisions. Therefore, the mechanism for implementing a court decision declaring a Deed of Sale and Purchase (AJB) null and void against a Land Deed Making Officer (PPAT) involves several stages, namely:

- 1) Issuance of Court Decision: The court issued a decision declaring the AJB null and void by law.
- 2) Enforcement of the Decision: A party who feels aggrieved can submit an application to the court for enforcement of the decision.
- 3) Announcement to PPAT: PPAT is informed of the court decision declaring the AJB void.
- 4) Changes or Cancellation of AJB: The PPAT makes changes or cancellations to the AJB in question in accordance with the court decision.
- 5) Legal Consequences: If the PPAT does not implement the decision, further legal sanctions may occur.

In addition, the General Cancellation Mechanism is:

- 1) Cancellation of an AJB that is legally void can be done either voluntarily by the parties concerned or through a court decision.
- 2) If the cancellation is done voluntarily, the parties concerned make a cancellation agreement and submit it to the BPN for registration.
- 3) If the cancellation is made through a court decision, the decision becomes the legal basis for the BPN to carry out the cancellation.

The mechanism for enforcing court decisions governing the responsibilities of Land Deed Officials (PPAT) regarding the execution of land sale and purchase deeds involves several stages. If a land sale and purchase deed is declared null and void by a court decision, the PPAT is responsible for completing the administrative protocol in his/her office by attaching a copy of the deed cancellation or judge's decision.

¹³Amelia, Uswah, (2021). "Jual Beli Tanah Yang Disempurnakan Dengan Putusan Pengadilan (Studi Putusan Pengadilan Negeri Surabaya Nomor: 676/PDT.G/2016/PN.SBY)", *Indonesian Notary*: Vol. 3: No. 3, Article 26, <https://scholarhub.ui.ac.id/notary/vol3/iss3/26> accessed on 9 May 2025 at 16.30 WIB.

4. Conclusion

The responsibility of the PPAT for the sale and purchase deed he made which is not in accordance with the procedure for making a PPAT deed or is proven to have committed a violation in carrying out his duties and position so that the deed he made contains legal defects based on deviations from the formal requirements and material requirements of the procedure for making a PPAT deed, then the PPAT can be subject to or given the following sanctions.

a. Administrative Sanctions:

The Land Deed Making Official (PPAT) involved in making the Land Sale and Purchase Deed (AJB) can receive a warning, a fine, or even temporary or dishonorable dismissal.

b. Civil Penalties:

If the Deed of Sale and Purchase (AJB) of Land made by the Land Deed Making Officer (PPAT) is cancelled by law, then the Land Deed Making Officer (PPAT) is responsible for unlawful acts (Article 1365 of the Civil Code) and/or negligence in implementing the principle of prudence.

c. Criminal Sanctions:

Criminal sanctions for Land Deed Officials (PPAT) who render a Deed of Sale and Purchase (AJB) null and void can include dishonorable dismissal from their position and potential criminal charges for forging or falsifying the deed. Furthermore, the PPAT may also be sued for civil damages by the injured party. The mechanism for enforcing a court decision declaring a Deed of Sale and Purchase (AJB) null and void against a Land Deed Official (PPAT) involves several stages. First, a legally binding court decision serves as the legal basis for canceling the AJB. Second, the cancellation of the AJB is carried out through a legal process involving the court and relevant agencies, such as the National Land Agency (BPN). Third, the PPAT can be sued for damages by any party harmed by errors or negligence in the preparation of the deed.

5. References

Journals:

- Amelia, Uswah, (2021), "Jual Beli Tanah Yang Disempurnakan Dengan Putusan Pengadilan (Studi Putusan Pengadilan Negeri Surabaya Nomor: 676/PDT.G/2016/PN.SBY)", *Indonesian Notary*: Vol. 3: No. 3, Article 26, <https://scholarhub.ui.ac.id/notary/vol3/iss3/26> accessed on 9 May 2025 at 16.30 WIB.
- Baharudin, (2014), "Kewenangan Pejabat Pembuat Akta Tanah (PPAT) Dalam Proses jual Beli Tanah", *Jurnal Keadilan Progresif*, Vol. 5 Nomor 1, *Jurnal Keadilan Progresif*, Vol. 5, Nomor 1, <https://jurnal.ubl.ac.id/index.php/KP/article/view/441> accessed on 10 August 2024 at 10.00 WIB
- Yovita Christian Assikin et al., (2019), "Tanggung Jawab Pejabat Pembuat Akta Tanah Berkaitan Dengan Dibatalkan Akta Jual Beli Ditinjau Dari Peraturan

Perundang-Undangan Yang Berlaku”, *Jurnal Ilmu Hukum Kenotariatan Fakultas Hukum Unpad*, Volume 3, Nomor 1, <https://jurnal.fh.unpad.ac.id/index.php/akta/issue/view/14> accessed on 20 December 2024 at 13.00 WIB.

Books:

- Adrian Sutedi, (2014), *Peralihan Hak Atas Tanah dan Pendaftarannya*, Jakarta : Sinar Grafika
- G.H.S. Lumban Tobing, (1980), *Peraturan Jabatan Notaris*, Jakarta : Erlangga
- Mhd. Yamin Lubis dan Abd. Rahim Lubis, 2012, *Hukum Pendaftaran Tanah*, Bandung : Mandar Maju
- Mulyoto, (2012), *Perjanjian (Tehnik, cara membuat, dan hukum perjanjian yang harus dikuasai*, Yogyakarta : Cakrawala Media
- Soedharyo Soimin, (2008), *Status Hak dan Pembebasan Tanah*, Sinar Grafika, Jakarta
- Sudikono Mertokusumo, (2006), *Hukum Acara Perdata*, Edisi ke-7. Cet. 1, Yogyakarta : Liberty
- Urip Santoso, (2016), *Pejabat Pembuat Akta Tanah (Perspektif Regulasi, Wewenang dan Sifat Akta)*, Jakarta : Prenadamedia Group

Regulation:

- Government Regulation Number 37 Article 2 of 1998 concerning the Regulations on the Position of Land Deed Making Officials
- Indonesia, Government Regulation on Land Registration, PP No. 24 of 1997, LN No. 59, TLN No. 3696, Article 3

Interview:

- Interview with Sugiyanto, SH, M.Kn., Notary in Pekalongan Regency, on December 16, 2024.