

Legal Consequences of Incorrectness in the Declaration of the Presentative in the Inheritance Deed Made by the Notary (Study of Supreme Court Cassation Decision Number: 917 K/Pdt/2025)

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Abstract. *The validity and evidentiary power of an authentic inheritance deed made before a Notary still raises disputes over inheritance deeds where the existence of an authentic deed does not always guarantee a final and binding resolution of inheritance disputes so that this condition creates legal uncertainty, both for the heirs and for the Notary as a public official. The purpose of this thesis research is to determine the legal consequences for the Notary regarding the inaccuracy of the statement of the person appearing in the Notary's inheritance deed, to analyze the judge's considerations regarding disputes over inheritance deeds made authentically before a Notary in decision number: 917 K/Pdt/2025 and to determine the format of an authentic Notary deed of inheritance information based on the provisions in force in Indonesia. The research method applied in this study is normative juridical, utilizing a statute approach and a case approach. The analysis was conducted qualitatively, relying on primary, secondary, and tertiary legal materials. All data were analyzed based on the theory of legal certainty and the theory of responsibility as the research's conceptual framework.*

Keywords: *Applicant's; Dispute; Inheritance; Notary; Statement.*

1. Introduction

Notarial inheritance deeds are in principle intended to provide legal certainty regarding who the legitimate heirs are and the share of each heir, but in practice they often become the object of disputes in court due to differences in interpretation of norms, disharmony of regulations, and the lack of synchronization of the application of the law by judges (Mertokusumo: 2010). Disputes over inheritance deeds as reflected in the Supreme Court Decision Number 917 K / Pdt / 2025, as a decision file that is the object of the author's

research with the previous Decision from the Serang District Court Number 171 / Pdt.G / 2023, then in the Appeal Decision of the Banten High Court Number 176 / PDT / 2024, up to the Cassation Decision of the Supreme Court. (Supreme Court Decision Number: 917 / K / PDT / 2025, <https://putusan3.mahkamahagung.go.id/direktori/putusan/11f02bc94cf71e34ba5b313230303032.html>.) The series of decisions shows that the existence of an authentic deed does not always guarantee a final and binding resolution of inheritance disputes. Judges, in deciding cases, not only assess the formal aspects of the deed, but also assess the material aspects, the legal standing of the parties, and the deed's compliance with the applicable inheritance law system. This condition raises research questions regarding the extent to which judges' considerations are in line with statutory regulations, the principles of inheritance law, and developing jurisprudence.

Issues regarding the professionalism of notaries are escalating, as demonstrated by a case in Banten Province, particularly within the jurisdiction of the Serang District Court. According to the Serang District Court's Case Tracking Information System (SIPP), 33 cases involving notaries have been reported in the media, for example, from 2022 to the present (<https://www.sipp.pn-serang.go.id/>), a Notary in Serang City was reported for alleged violations in the preparation of deeds, thus attracting public attention. Furthermore, in 2024, there was a case of a Notary allegedly involved in issuing fake inheritance deed documents (Facts Banten News, Becoming a Victim of Legal and Judicial Mafia at the Serang District Court, This Woman from Cilegon Loses Her Inheritance Rights, <https://faktabanten.co.id/cilegon/1/pan-mafia-hukum-dan-peradilan-di-pn-serang-wanita-asal-cilegon-miri-kehilangan-hak-waris/>)

Inheritance disputes in Indonesia are a type of civil case frequently brought to court, particularly the District Court. These disputes generally arise due to differing interpretations of the rights of heirs, the validity of wills, the distribution of inherited assets, or unilateral control by one of the heirs. In the Indonesian civil law system, inheritance disputes can be submitted to the District Court if the parties cannot reach an agreement through family deliberation. (Subekti: 2008) This indicates that litigation mechanisms are a last resort in resolving inheritance conflicts after non-litigation channels have failed.

Based on a series of documents revealed in the case, initially there was a Certificate of Inheritance Rights Number 03, dated February 6, 2020, made before Notary SH in Cilegon, which stated that the heirs of the deceased HW were her four children, not just GN alone. However, then appeared Certificate of Inheritance Rights Number 3, dated January 6, 2023 made by Notary RD which only listed GN as an heir, omitting the names of three other heirs, thus giving rise to allegations that the information contained therein was incorrect, unlawful, and legally flawed. This allegation was strengthened by statements from the

parties stating that the Notary was never present or gave power of attorney for the preparation of the letter, but the Notary's name was listed as a party present in the deed.

Based on the document Certificate of Inheritance Rights Number 25/N/AR/III/2021, dated March 3, 2021, made by Notary AR, where this letter states SS as the sole heir of the late Kumalawati alias OGH. Based on this letter, SS then filed a lawsuit with the Serang District Court against his adoptive father regarding the ownership of his mother's inheritance. During the trial process, the counter-defendants alleged that the preparation of the Certificate of Inheritance Rights Number 3 by Notary RD had contained false information, did not correspond to the actual situation, and contained allegations of criminal acts such as fraud, forgery of documents, and the inclusion of false information in authentic deeds as regulated in Articles 378, 263, 266, and 277 of the Criminal Code. Therefore, the letter was requested to be declared invalid and had no legal force.

From a legal perspective, the role of a Notary is to provide legal certainty to the legitimate heirs and must carry out their duties in accordance with the law to ensure there is no conflict of interest, document forgery, or fraud in the process of transferring inheritance rights. However, the existence of legal mafia practices revealed in this case shows that Notaries are in a vulnerable position, where Notaries can be involved in legal disputes that can influence legal decisions related to documents Notaries make. The responsibility of Notaries in legal processes such as this inheritance case is not only limited to recording, but also includes moral and ethical responsibilities to ensure the integrity of the Notary profession remains professional.

Disputes over authentic inheritance deeds made before a Notary show a gap between the purpose of establishing authentic deeds as an instrument of legal certainty and the practice of their application in court decisions. Based on this, the purpose of the research in writing this article is to determine and analyze the legal consequences for Notaries regarding the inaccuracy of the testimony of the person appearing in the Notary's inheritance deed in decision number: 917 K/Pdt/2025.

2. Research Methods

The research method applied in this study is normative juridical, utilizing a statute approach and a case approach. The analysis was conducted qualitatively, relying on primary, secondary, and tertiary legal materials. All data were analyzed based on the theory of legal certainty and the theory of responsibility as the research's conceptual framework. Data obtained from library research and normative research were analyzed using qualitative methods and compiled descriptively. Descriptive methods were used to analyze data by selecting

information that illustrates real conditions in the field. Meanwhile, qualitative methods were applied by sorting and grouping the obtained data based on their qualifications and validity. The data were then systematically compiled and linked to theories derived from the library study, resulting in a more in-depth analysis of the legal phenomena, phenomena, or events that are the focus of the research.

3. Results and Discussion

3.1. Legal Consequences for Notaries Regarding Incorrect Statements of the Applicant in the Deed of Inheritance

The Notary's obligation to verify the material truth of the Applicant's Statement has clear limitations according to the doctrine and practice of notarial law. In general, the Notary Law is not required by the Notary Public Law to investigate the factual truth of all material statements submitted by clients, because this is beyond the authority of the Notary's position and is more the domain of law enforcement or evidence in court. As emphasized in the research by Taufik, entitled "The Notary's Right to Immunity in Carrying Out Duties Not Charged with Seeking Material Truth", in the *Officium Notarium* journal, which explains that Notaries are not required to actively seek material truth, the Notary's duty is to record and formulate what the parties have stated honestly and formally, and not to conduct factual investigations outside the submitted documents (Taufik: 2025). This limitation does not mean that Notaries may be passive if there is information that clearly contradicts the facts or other valid documents. The principle of Prudence or caution inherent in the profession of Notary requires that if there is a strong indication of inconsistency between the Statement of the Applicant and the documents presented, the Notary must carry out further clarification or postpone the making of the deed until this can be resolved. (Utrecht: 1989)

In the author's analysis, the Notary's obligation to examine the formal truth and the limits of material truth of the Applicant's Statement gains concrete relevance when linked to Supreme Court Decision Number 917 K/Pdt/2025, which is the object of this research. In this case, the dispute is rooted in the existence of an inheritance deed drawn up before a Notary, whose validity was then questioned by one of the parties because it was suspected of not reflecting the actual state of inheritance law. This condition shows that the main problem is not merely the form of the deed as an authentic deed, but rather the extent to which the Notary has carried out his professional obligations in examining the formal truth and being careful about the material statements of the appearers.

In its cassation decision, the Supreme Court in principle emphasized that the assessment of an inheritance deed cannot be separated from a comprehensive evidentiary process, including testing the legal basis for determining the heirs

and the deed's conformity with previously existing legal facts. This is in line with the doctrine that a Notary is not burdened with the obligation to thoroughly investigate the material truth of every client's statement, but is still required to exercise the principle of professional care and accuracy when there is an indication that the information provided has the potential to give rise to a dispute. In the case of Supreme Court Decision No. 917 K/Pdt/2025, the existence of different interpretations regarding the status of adopted children and biological heirs indicates that the inheritance deed arose from a sensitive and complex legal situation, thus demanding a higher level of caution from the Notary.

Furthermore, in the author's analysis, the Supreme Court considered that the first instance *Judex Facti* Judge was not mistaken in placing the inheritance deed as valid evidence as long as there was no evidence of obvious formal and material defects. This consideration implicitly shows that the Notary's responsibility in this case is understood within the limits of formal truth, namely ensuring the identity of the parties, legal capacity, and the procedures for making the deed have been fulfilled. However, at the same time, the Supreme Court also stated that the inheritance deed is not an absolute evidence, so it can be set aside if it is proven to be contrary to legal facts and substantive justice. Thus, this decision confirms the doctrinal position that the Notary is not responsible for the absolute material truth of the Applicant's Statement, but must still be responsible if his professional negligence causes the deed to contain legal defects.

In the normative study in Supreme Court Decision No. 917 K/Pdt/2025, it is shown that the Notary's obligations are at a balance point between formal legal certainty and dispute prevention. Notaries are required not to exceed their authority by acting as fact investigators, but also must not be passive when there are rational doubts about the statements provided by the parties. In this case, the Supreme Court emphasized the correction of the application of inheritance law by the appellate judge rather than the professional errors of the Notary, thus showing that the assessment of the Notary's obligations is highly dependent on the presence or absence of evidence of real negligence in carrying out formal obligations and the principle of prudence. Then, Supreme Court Decision No. 917 K/Pdt/2025 can be used as an important basis to strengthen the argument that the Notary's obligations in making inheritance deeds primarily lie in fulfilling formal truth and applying the principle of professional prudence, while the material truth of the Applicant's Statement remains in the realm of evidence in court. Analysis of the object of the dispute regarding the inheritance deed can be said to be the result of a conflict of interest between the parties and the interpretation of inheritance law, not solely the result of a violation of the Notary's obligations, unless it can be proven that there was negligence or clear deviation in the implementation of the Notary's position.

3.2. Judge's Consideration of the Status of the Deed of Inheritance by the Notary Based on the Statement of the Applicant

A notary's inheritance deed is a written form of evidence that has authentic evidentiary power as long as it meets the formal and material requirements as stipulated in laws and regulations. In practice, the inheritance deed is prepared based on the statements of the parties who appear to state the legal relationship of inheritance, the identity of the heirs, and facts related to the inheritance of the testator's inheritance. Legal issues then arise when the statements of the parties who serve as the basis for the creation of the inheritance deed are questioned in court, thus requiring the judge to assess the standing and evidentiary power of the notary's inheritance deed in the evidentiary process. Therefore, the judge's consideration of the standing of the inheritance deed prepared based on the statements of the parties becomes important to examine, not only to determine the validity of the deed as evidence, but also to balance the principles of legal certainty, justice, and protection for interested parties.

At the District Court level, the judge's legal considerations in Decision Number 171/Pdt.G/2023/PN.Srg indicate that the panel of judges placed the inheritance deed made before a notary as the main evidence, but not absolutely. The judge explicitly began his considerations by examining the deed's status as an authentic deed as referred to in Article 1868 of the Civil Code, namely whether the deed was made by an authorized official, in a form prescribed by law, and within his jurisdiction. From a formal aspect, the judge stated that the inheritance deed administratively met the requirements as an authentic deed because it was made by a legitimate notary and fulfilled the formal procedures for making a deed. However, the District Court judge did not stop at examining the formal aspects alone. The panel of judges then assessed the material truth of the deed's contents, particularly regarding the status of the parties as legal heirs. As in the related Decision table:

COURT DECISION TABLE

ASPECT	SERANG District Court (171/PDT.G/2023)	PT BANTEN (176/PDT/2024)	Supreme Court of Appeal (917 K/PDT/2025)
The parties	HW cs (Plaintiff) vs SS (Defendant) + Co- Defendant	SS (Comparator) vs HW cs (Compared) + Co- Compared	HW cs (Cassation Applicant) vs SS (Cassation Respondent) + Co-Respondent
Object of Dispute	The inheritance of the late KM alias OGH (±70 plots of land & buildings)	Same as PN	Same as PN & PT
Legal Position	- Plaintiff: a) Children of the late KM & OH b) Defendant: Adopted child (SS)	Same	Same

	c) Co-defendants: Heirs & related parties		
Initial Lawsuit	The plaintiffs requested the determination of KM's inheritance and distribution of inheritance according to law.	SS's appeal memo rejects the District Court's decision	HW et al's cassation memorandum rejects the PT decision
Legal Considerations	The District Court assessed that the evidence of ownership was valid, the family relationship was clear, and SS did not have sole rights.	The PT assessed that the PN made an error in assessing the rights of the adopted child & proof of ownership	The Supreme Court considers that the PT has incorrectly applied inheritance law and upheld the District Court's decision.
Verdict	The lawsuit was granted, the inheritance was recognized as a joint inheritance of the biological heirs.	PN cancelled, SS given broader rights	The PT decision was annulled, the PN was upheld (the assets were divided among the biological heirs)
Analysis	Inheritance for all natural heirs	SS prioritizes the rights of adopted children	The rights of adopted children do not remove the rights of biological heirs.

Supreme Court Decision Number 917 K/Pdt/2025 is the final stage of a series of inheritance case examinations between SS as the adopted son of the late KM alias OGH against the deceased's siblings. In this cassation decision, the Supreme Court essentially rejected the cassation petition of the Cassation Applicants and upheld the legal considerations of the *judex facti*, both the Serang District Court and the Banten High Court, which had determined SS as the sole legal heir of the late KM. In its legal considerations, the Supreme Court emphasized that the examination at the cassation level was not intended to re-evaluate the facts that had been considered by the *Judex Facti*, but was limited to the application of the law as regulated in Article 30 of Law Number 14 of 1985 concerning the Supreme Court as amended. Therefore, as long as the *Judex Facti* had applied the law appropriately and did not violate the law or the principles of fair trial, the Supreme Court had no legal reason to overturn the decision. This approach is in line with the theory of legal certainty in judges' decisions, which places decisions as the final instrument to definitively end legal disputes. (Mertokusumo: 2010)

The Supreme Court implicitly affirmed the *judex facti* consideration that bases the determination of heirs on the legal status of the adopted child. By referring to the court's decision on adoption, the Supreme Court considered that the civil relationship between the adopted child and the adoptive parents had been fully established, including in the area of inheritance. This is in line with the civil law doctrine that states that adoption through a court decision has legal

consequences equivalent to the relationship between parents and biological children in the context of civil rights and obligations. (Subekti: 2008)

The Supreme Court's considerations demonstrate the application of the Ratio Decidendi Theory, namely that the primary legal reasoning underlying the decision lies in the recognition of the adopted child's legal status as the sole heir. Therefore, the Cassation Applicants' argument, which bases its claim solely on blood relations, is unacceptable, because in the inheritance system applied, the existence of heirs in the closest group closes off the rights of the next group. This consideration reflects the Supreme Court's consistency in maintaining the systematic inheritance law to prevent legal uncertainty due to overlapping heir claims. Another important aspect in this cassation decision is the Supreme Court's stance on the Certificate of Inheritance Rights (SKHM) prepared by Notary RD., the Supreme Court confirmed the *judex facti*'s view that the SKHM does not have binding legal force, because its contents contradict the legal facts regarding the actual position of the heirs. Therefore, the Supreme Court places the notarial deed not as absolute truth, but as evidence whose material truth can still be tested before the court.

4. Conclusion

The research findings in Supreme Court Decision Number 917 K/Pdt/2025 affirm the fundamental principle that notarial inheritance deeds are not immune to judicial review and must be placed within the framework of seeking material truth and substantive justice. A series of decisions from the District Court to the cassation level consistently establish adopted children as the sole legitimate heirs and set aside Certificates of Inheritance Rights that contradict legal facts, while confirming that notaries' obligations focus on fulfilling formal truth and applying the principle of professional prudence. The Supreme Court, with its Judicial Restraint approach, places more emphasis on correcting the application of inheritance law by *Judex Facti* than on establishing new doctrines regarding notary liability, so that this decision functions strongly as a dispute resolution and guardian of legal certainty, but still leaves room for the development of more progressive legal arguments. Based on the research analysis study, it can be concluded and suggested that the inaccuracy of the witness's statement in the inheritance deed made by the Notary has serious legal consequences, because even though the Notary is normatively responsible for the formal aspects, the judge has the authority to assess the application of professional principles and the principle of prudence in making the deed, so that the deed that does not reflect the material truth can be set aside for the sake of substantive justice. Supreme Court Decision Number 917 K/Pdt/2025 places the notarial inheritance deed not as absolute evidence, but as evidence that must be tested critically and contextually, while also emphasizing the Notary's obligation

to conduct reasonable verification of the status of the heir and the legal basis of inheritance.

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