

Legal Analysis of Criminal Liability of Land Deed Officials (PPAT) for Land Document Engineering (Study of West Jakarta District Court Decision Number 248/Pid.B/2022)

Rahmat Tri Andika Debataraja¹⁾, Janpatar Simamora²⁾ & Januari Sihotang³⁾

¹⁾Faculty of Law, Universitas HKBP Nommensen Medan, Indonesia, E-mail: rahmatriandika062@gmail.com

²⁾Faculty of Law, Universitas HKBP Nommensen Medan, E-mail: patarmora@uhn.ac.id

³⁾Faculty of Law, Universitas HKBP Nommensen Medan, E-mail: januarisihotang@uhn.ac.id

Abstract. *This study aims to analyze the criminal liability of Land Deed Officials (PPAT) in the fabrication of land documents as well as the supervision and prevention efforts based on the West Jakarta District Court Decision Number 248/Pid.B/2022. The issues studied include the form of criminal liability of PPAT involved in falsification or manipulation of land documents and the effectiveness of the supervision mechanism by the Ministry of Agrarian Affairs and Spatial Planning/National Land Agency. The research method used is normative legal research with a statutory approach and a case approach, and analyzed qualitatively. The results of the study indicate that PPAT can be held criminally responsible if proven to have intentionally participated in the act of authentic deeds. In addition, administrative supervision of PPAT still faces various obstacles, so it is necessary to strengthen the supervision system, increase professionalism, and enforce strict sanctions to prevent the recurrence of the practice of fabricating land documents.*

Keywords: *Criminal; Land; PPAT; Supervision.*

1. Introduction

Land Deed Officials (PPAT) play a crucial role in supporting the national land law structure. Specifically, they are responsible for ensuring legal certainty and providing adequate legal protection in the context of promoting or transferring legal rights to land through the preparation of authentic deeds. The documents produced by PPATs serve as evidence of full legal force in land registration procedures, in accordance with legal regulations in the land sector (Indonesia, 1998 jo. 2016). Land holds strategic value in the lives of Indonesians, serving as a central place to live, establish businesses, and provide many other opportunities for development to meet daily needs. Therefore, the state is obligated to create

regulations concerning legal administration that are in accordance with legal certainty so that ownership continuity can be felt (Lusiana, 2025, p. 1-3). Government Regulation Number 24 of 1997 concerning Land Registration, which places certificates as a strong legal aspect as long as the physical and legal data are in accordance with the land book and the relevant measurement certificate (Article 32 paragraph (1) of PP No. 24 of 1997).

In the series of registration processes, the existence of the Land Deed Making Officer (PPAT) plays a very central role and the PPAT is obliged to act carefully, independently, and impartially and ensure the truth of the identity, authenticity of documents, and suitability of the land object. (Kholidah, 2023: 5–7). The PPAT deed as an authentic deed has a very central role and is certainly very important as regulated in Article 1868 of the Civil Code (KUHPer). Suyatno is of the opinion that the registration is not only legal certainty regarding the rights of the community but can also be used for the implementation of taxes on the community to help the needs of the state, in addition to that, it is also stated in Article 19 paragraph (1) of the UUPA which is instructed as planning, organizing, which is aimed at being in line with the needs of the community but also getting the needs of the state as well (Suyatno., 2023, p. 149).

However, in today's increasingly changing conditions, many abandoned lands and also the demands of people who own land but do not have legal aspects, often occur forgery or manipulation of documents. Land Deed Making Officials (PPAT) who register do not follow standard operating procedures (SOP) or carry out reprehensible activities by falsifying the letter and manipulating the land deed (Permadi., 2023, p. 4). This problem is neglected between the real rights of the community and the status of private ownership but is seized by someone who has no legal certainty for PPAT with malicious intentions who should enforce the law according to procedure. However, dare to carry out reprehensible activities and also violate existing laws that are directed from a criminal law perspective (Damianus Krismantoro., 2022, p. 6).

This is also regulated in Law Number 1 of 1946 concerning the Criminal Code Article 263 and Article 264 which each regulate document forgery. Which explicitly prohibits this with a criminal penalty of 6-8 years for anyone proven to violate (Republic of Indonesia, 1946). This is also combined in the journal research according to Meisya Aditia entitled PPAT's Responsibility for Sale and Purchase Deeds Based on false information provided by the parties, it is emphasized that criminalization of PPAT in cases related to forgery is very necessary and very necessary in order to maintain the integrity of a PPAT and also maintain legal morality and public trust in the land system. (Meisya., 2024, p. 87-102).

One of the crucial things that is evidence that in the Criminal Case of the West Jakarta District Court Decision Number 248/Pid.B/2022 in the Decision, a PPAT was involved in carrying out criminal activities such as manipulating land ownership documents which resulted in the transfer of legal rights (Sinabutar, Simamora, & Sinaga, 2023, p. 50). Where the perpetrators have direct authority or have jobs as Notaries and also Land Deed Making Officials (PPAT) who have authority in the West Jakarta area.

The Panel of Judges considered that the perpetrators were legally and convincingly proven to have jointly participated in falsifying authentic deeds and even money laundering. Based on this argument, the landowner felt that legal action was necessary on the grounds of falsifying documents or authentic deeds (Hutagaol & Simamora, 2025, p. 195). This case is important to discuss and research because it concerns the legal perspective of criminal responsibility imposed on Land Deed Officials (PPAT) who engineered or falsified documents, and is correlated with money laundering (District Court of West Jakarta, 2022).

The analysis in this decision has the important purpose of providing several things, first, what needs to be shown about the limits of a PPAT's authority in carrying out administrative processes and what the standard of prudence (Due Diligence) is (Kholidah., 2023, p. 7). What should be applied when transferring title deeds, second, from this decision, it is necessary to examine the criminal liability of PPATs who manipulate administration, or fabricate land deeds according to the analysis of the decision (Gaurifa., 2022, p. 4). This has implications for the PPAT supervision system and strategies for preventing irregularities in land document administration, as well as realizing administrative order and legal certainty for the entire Indonesian nation and society.

Given all these phenomena, it is crucial to examine the understanding of criminal liability for Land Deed Officials (PPAT) who manipulate documents and also participate in doing so. This research will be very useful in discussing criminal law, agrarian law, and also concerning government governance related to land crimes and also protecting the public against public trust in the bureaucracy of State Officials (Diana., 2022, p. 6). Based on the explanation as the background, the author has the aim of conducting a study "Legal Analysis of Criminal Liability of Land Deed Officials (PPAT) for Manipulating Land Documents (Study of West Jakarta District Court Decision 248/Pid.B/2022)"

2. Research Methods

This research was conducted using a normative juridical approach, where data collection was carried out through a comprehensive library research. The objects of study include primary legal materials in the form of laws regulating the function of Land Deed Making Officials, secondary legal materials consisting of legal

literature in the form of books, scientific papers, legal journals, and the Big Indonesian Dictionary (KBBI) as supporting sources. The approach methods applied in this research include a case approach that examines the Decision of the West Jakarta District Court Number 248/Pid.B/2022, and a statutory approach by examining Government Regulation Number 24 of 1997 and other provisions. Research data were obtained from various regulatory regulations, court decisions, academic literature, scientific journals, expert opinions, and legal dictionaries. All of this data was then systematically analyzed to describe the authority and legal responsibilities of Land Deed Making Officials (PPAT).

3. Results and Discussion

3.1. Criminal Liability of Land Deed Officials (PPAT) in Land Document Fabrication Cases Based on West Jakarta District Court Decision Number 248/Pid.B/2022

The Land Deed Making Officer (PPAT) is the person authorized in accordance with statutory regulations to be given the authority to attributably create documents or often called authentic deeds or ownership rights. This position places the PPAT as a central instrument to guarantee legal certainty in the land sector, because the deeds made not only function as evidence that has perfect evidentiary power, but also become the administrative basis in the land registration process (Republic of Indonesia., 1996, Article 1).

From the perspective of the theory of criminal responsibility, a legal subject can only be held accountable if three fundamental prerequisites are met, namely the existence of a violation or unlawful act (*actus reus*), the existence of an error in the form of intent or negligence (*mens rea*), a crime arises when the perpetrator commits an act that violates existing regulations, the term applied in criminal law (*Nullum delictum, nulla poena sine praevia lege poenali*) There is no criminal offense if there are no legal regulations that regulate it (January., 2026, p. 228).

As a public official, a Land Deed Official (PPAT) is legally obligated to uphold a code of ethics, namely, to act honestly in carrying out its duties, especially when preparing documents related to land. A PPAT deed is not merely an administrative document or an aspect of ownership; it is the basis for the birth of the legal rights and obligations of the parties. Therefore, every information contained in the PPAT deed must comply with the circumstances or legal provisions and the actual facts on the ground. If a PPAT commits a reprehensible act, it is not only a moral issue but also a criminal law regulation, namely creating a document containing false information, which is certainly explicitly regulated by criminal law (Habib Adjie, 2022, p. 45-47).

Criminal liability for PPAT arises in his actions if the elements of the crime of falsification of documents are fulfilled and the inclusion of false information into an authentic deed in the old Criminal Code Law Number 1 of 1946 and similar

regulations are maintained in the new Criminal Code, namely Law Number 1 of 2023. The main element that distinguishes administrative errors from criminal acts is the element of intent (*dolus*) or the perpetrator's knowledge that his actions are contrary to the law (Tampubolon, Sitohang, & Debata Raja, 2024, p. 3).

In the context of making a deed, a PPAT who knows that the document or information used is invalid or incorrect, but still includes it in the deed, can be held criminally responsible because he is considered to have abused the authority of office given by the state (Mulyadi., 2021, p. 86 – 89). In the perspective of the Old Criminal Code, falsification of authentic deeds or in the context of falsified documents is regulated in Article 263 and Article 264 of the Criminal Code, which essentially threatens any act, making, or using a false document that can cause harm (Republic of Indonesia., 1946, Article 263).

Similar provisions are maintained in the new Criminal Code based on the context of the Law in the new National Criminal Code, it is clear in the provisions of Article 391 to Article 394 that it can be punished with imprisonment of 6 (six) years and a fine of category VI (Republic of Indonesia., 2023, Article 263). PPAT as a public official can be charged with this Article if valid and convincing evidence has made or assisted in a deed whose substance is not relevant to the truth, with the intention that the deed is used as if it were true. Thus, the engineered PPAT deed not only damages legal certainty in the land sector, but also injures public trust in the institution of the State Land Deed Making Official (Soesilo., 2020, pp 194).

The application of criminal sanctions against PPAT in land document engineering cases also reflects the function of criminal law as an ultimatum remedium to protect the legal interests of the community. Criminal liability against PPAT can be seen concretely in the Decision of the West Jakarta District Court Number 248 / Pid.B / 2022. This case is from the process of transferring land rights which is stated in the form of a sale and purchase made by the Land Deed Making Officer (PPAT) (Manalu, TH, V., & Simamora, 2026, p. 332).

In practice, the parties submit a number of documents as the basis for the deed. However, it is later revealed that these documents contain information that does not reflect the actual situation. Nevertheless, the Land Deed Official (PPAT) continues the deed-making process and grants approval by signing the deed of sale and purchase and power of attorney related to the transaction. After the deed is used as the basis for the transfer of rights, the aggrieved party becomes aware of the inconsistencies and alleged document forgery.

The case was then reported to the authorities and an investigation and inquiry was conducted. Based on the results of the investigation, it was discovered that the PPAT played an active role in making a deed containing false information, so the case was transferred to prosecution and examined at the West Jakarta District Court (West Jakarta District Court Decision No. 248/Pid.B/2022). The panel of judges in their considerations emphasized that the position of the PPAT who

carried out, ordered, and jointly carried out this act. It cannot be justified that public officials should maintain the code of ethics and public trust in the institution and legal certainty.

During the trial, the public prosecutor presented evidence in the form of deed documents, witness statements, and expert testimony, demonstrating that the deed lacked material truth and contained elements of forgery. The panel of judges then concluded that the elements of the crime of forgery of authentic documents and participation in the use of forged documents were indeed carried out by the parties.

Thus, the panel of judges ruled that the PPAT in this case not only violated ethical and administrative regulations, but also violated criminal law. Based on this description, it can be confirmed that the PPAT's criminal liability in the case of fabricated land document deeds is a legal consequence of the deliberate abuse of official authority.

The West Jakarta District Court's decision No. 248/Pid.B/2022 demonstrates that Land Deed Officials (PPAT) are not immune from criminal law if they are proven guilty of a crime. Therefore, criminal law enforcement against PPATs is expected to provide a deterrent effect while upholding the dignity of Land Deed Officials and ensuring the stability of justice for all.

3.2. Efforts to Supervise and Prevent Land Document Manipulation by Land Deed Officials (PPAT) in Indonesia Based on West Jakarta District Court Decision Number 248/Pid.B/2022

The West Jakarta District Court's Decision Number 248/Pid.B/2022 not only confirms the criminal liability of Land Deed Officials (PPAT) in cases of land document manipulation but also demonstrates the importance of monitoring and preventing the implementation of PPAT's duties. Criminal law enforcement in this decision is repressive because it is carried out after the violation has occurred. Therefore, preventive measures in the form of effective monitoring and prevention are needed to prevent a recurrence of the practice of land document manipulation by PPAT in Indonesia (West Jakarta District Court Decision Number 248/Pid.B/2022). Supervision of Land Deed Officials (PPAT) is a legal consequence of their position as law enforcers authorized to issue authentic deeds in the land sector.

This authority places PPAT beyond mere officials granted land rights. Normatively, the authority, obligations, and supervision of PPAT are regulated in Government Regulation Number 37 of 1998 concerning Position Regulations for Land Deed Officials as amended by Government Regulation Number 24 of 2016 (Republic of Indonesia, 1998). According to Urip Santoso, supervision of PPAT is an important state instrument to ensure that any changes to land legal data are based on valid, correct, and legally inaccurate deeds (Santoso, 2020 pp 112). Supervision of PPAT

is essentially implemented through two main forms, namely administrative supervision and technical supervision.

Administrative supervision emphasizes the PPAT's compliance with the formal obligations of his/her position, such as the use of official deed forms, the regular submission of deed reports, and the location of the work area. Meanwhile, technical supervision focuses on the quality of the deed's substance, particularly the accuracy of the identity of the legal subject and the legal object of land rights stated in the deed. This is in line with the provisions of Article 62 of Government Regulation Number 24 of 1997 concerning land registration (Republic of Indonesia, 1997 Article 62).

The Land Deed Official (PPAT) responsible for land registration, Bambang Eko Supriyadi, stated that negligence by PPATs in examining legal data often creates loopholes for land document manipulation, thus requiring strict and continuous technical supervision (Supriyadi, 2021, p. 147). In addition to repressive supervision, the Indonesian land law system also emphasizes the importance of preventive supervision as an effort to prevent the manipulation of land document deeds. Preventive supervision is realized through coaching and improving the duties of PPATs.

The principle of prudence requires the PPAT to carefully examine and verify the identities of the parties, check the validity of the legal basis, and ensure that the legal acts set forth in the deed do not conflict with the law. (Introduction to Legal Science Ifitah, Purwoto, Kurniawan, Manullang, Solapari, Ester, Geofani, Saragih, El-Hada, Rosyadi, Yetti, Matoah, Usman, Diharjo, Harefa, Hidayat., 2023., pp 166).

From a legal protection perspective, Satjipto Rahardjo emphasized that prevention is the most ideal form of legal protection because it can prevent losses before disputes arise (Rahardjo., 2019 pp 55). Efforts to prevent land document manipulation are also strengthened through the prevention of PPAT professional ethics. The Code of Ethics of the Association of Land Deed Officials (PPAT) requires PPATs to act honestly, independently, impartially, and responsibly in carrying out their duties (PPAT Position; IPPAT Code of Ethics). Violations of the code of ethics not only result in organizational sanctions but also have the potential to lead to criminal law implications if the act meets the elements of a crime.

Habib Adjie emphasized that violations of the ethics of the PPAT office often become the entry point for criminal acts of forgery of deeds or abuse of authority, so their supervision must be seen as an integral part of the legal oversight system (Adjie., 2020 pp 93). Along with technological developments, supervision of PPAT is also strengthened through the digitalization of land services. The implementation of the electronic land system as regulated in the Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of BPN Number 1 of 2021 concerning Electronic Certificates (Republic of Indonesia., 2021 Article 1). and the Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of BPN

Number 3 of 2023 concerning the Issuance of Electronic Land Documents Allows every step in the creation and registration of land deeds to be recorded electronically and can be traced.

Conceptually, efforts to supervise and prevent engineering of land documents by PPAT can be formulated in several main aspects, namely:

- 1) Government administrative oversight is carried out through a mechanism of guidance, inspection, and evaluation of the PPAT's performance. The primary objective is to ensure that each deed is drawn up according to procedure, based on correct physical and legal data, and free from legal defects.
- 2) Enforcement of a professional code of ethics that demands honesty, independence, accuracy and impartiality in exercising authority.
- 3) Application of the principle of professional caution (due diligence) to check the authenticity of documents, history of land ownership, and reject the making of deeds if there are indications of untruths.
- 4) Digitization and integration of land information systems and integration aimed at transparency, accuracy, and ease of document verification.
- 5) The function and purpose of imposing firm administrative, ethical and criminal sanctions is to have a deterrent effect and enforce the law against perpetrators.
- 6) Continuous development of professionalism and integration of PPAT which aims to provide continuous education, ethics training and ethics education for PPAT.

If preventive supervision is not effective and the PPAT continues to commit violations, repressive supervision is enforced through the imposition of sanctions. Administrative sanctions against PPAT can be in the form of a written warning, temporary dismissal, or permanent dismissal (Gaol & Simamora, 2025, p. 974). However, if the PPAT's actions fulfill the elements of a criminal act, the PPAT can be held criminally responsible based on the provisions of Article 263, Article 264, and Article 55 of the Criminal Code which are directly related to land document engineering (Republic of Indonesia, 1949 Article 263). Moeljanto emphasized that the position does not eliminate criminal responsibility if the actions carried out clearly fulfill the elements of a crime and are included in the Land Deed Making Official (PPAT) (Moeljatno., 2020).

The West Jakarta District Court's decision No. 248/Pid.B/2022 is a concrete example of the application of repressive oversight of Land Deed Officials (PPAT). In this decision, the panel of judges deemed that the actions of the PPAT involved in the fabrication of land documents met the elements of the crime of falsifying authentic deeds. The official authority held by the PPAT is actually seen as a factor aggravating criminal liability, as the deed produced is very similar to the actual deed and has a broad impact on the legal certainty of land rights. This decision

confirms that PPAT deeds are not immune from the law and can become the object of criminal investigation if misused (Jakarta District Court No. 248/Pid.B/2022).

Thus, efforts to supervise and prevent land document manipulation by PPAT must be implemented comprehensively through synergy between administrative supervision of the enforcement of professional codes of ethics, utilization of technology, and enforcement of criminal law, West Jakarta District Court Decision Number 248/Pid.B/2022 functions not only as a means of enforcement, but also as a learning and warning for other PPATs to carry out their positions professionally, integratedly, and responsibly for the realization of legal certainty accompanied by protection of the interests of the community.

4. Conclusion

Based on the results of the discussion regarding the regulation of rights and obligations that must be fulfilled by Land Deed Making Officials (PPAT) as well as efforts to supervise and prevent engineering of land documents reviewed from the Decision of the West Jakarta District Court Number 248 / Pid.B / 2022, the following conclusions can be drawn. Legal regulations regarding the obligations and responsibilities of PPAT have been expressly regulated in laws and regulations, especially in the Government Regulation concerning the Position of PPAT. PPAT as a public official is obliged to act honestly, independently, impartially, and ensure the accuracy of physical and legal data in every land deed creation. Violation of these obligations can result in administrative, civil, and criminal liability. Efforts to supervise and prevent the manipulation of land documents by Land Deed Officials (PPAT) are carried out through guidance and administrative control by the Ministry of Agrarian Affairs and Spatial Planning/National Land Agency and enforcement of the code of ethics by professional organizations. West Jakarta District Court Decision Number 248/Pid.B/2022 confirms that the involvement of PPATs in the use or creation of unauthorized documents can result in criminal liability, so that integrity, professionalism, and the application of the principle of prudence have a very significant urgency in carrying out the PPAT's position. In light of these findings, strengthening administrative oversight is necessary through improving document verification systems, digitizing land data, and conducting periodic audits of the PPAT's office. Furthermore, fostering and enforcing the professional code of ethics must be carried out consistently and transparently, accompanied by the imposition of strict sanctions for any violations. The application of the principle of prudence in verifying the formal and material accuracy of documents must be the primary standard in every deed. With ongoing synergy between administrative oversight, enforcing professional ethics, and enforcing criminal law, it is hoped that the prevention of land document manipulation can be comprehensively realized, thereby ensuring legal certainty, protecting public rights, and sustaining the integrity of the PPAT profession.

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