

Legal Power of Deeds of Officers Making Legal Defective Land Deeds

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Abstract. *Legal actions stated by the parties in the deed made by the PPAT have evidentiary power but do not guarantee freedom from disputes between other interested parties, as is often seen in buying/selling transactions. This study aims to analyze the role of the Land Deed Making Officer (PPAT) in providing legal certainty through the making of valid deeds in accordance with applicable legal provisions. The research methods used are normative, legal, and conceptual. The results of the study indicate that deeds made by PPAT have an important role in ensuring legal certainty for land rights holders. However, there is a risk of legal defects that may arise due to non-compliance with applicable provisions. In addition, court decisions that confirm violations of the law by PPAT indicate the need for increased supervision and law enforcement of PPAT practices. This study recommends the need for ongoing PPAT training and strengthening regulations to prevent violations and increase public trust in the land registration system.*

Keywords: *Making Official Land Deeds, Legal Certainty, Authentic Deeds, Land and Building Tax, Legal Violations.*

1. Introduction

Land ownership and control are fundamental aspects of social, economic and cultural life of a society. Land not only serves as a resource for agriculture and infrastructure development, but also as a symbol of status and identity for individuals and communities. In Indonesia, with rapid population growth and ongoing urbanization, the need for land as a vital resource is increasing. This

causes problems related to land ownership and control to become a very important issue, both legally and socially.¹

Basic Agrarian Law No. 5 of 1960 (UUPA) emphasizes the importance of legal certainty in land ownership by guaranteeing the rights of individuals and groups to the land they own. UUPA aims to provide clarity and legal certainty to land owners through good and transparent land regulations. However, practices in the field show that many individuals or legal entities have difficulty in defending their land rights. Land disputes often arise due to a lack of understanding of the law, administrative errors, and abuse of authority by certain parties.²

In this context, the Land Deed Official (PPAT) plays a very crucial role in the land registration process. PPAT is responsible for making authentic deeds that serve as the legal basis for the transfer of land rights. Deeds made by PPAT have high evidentiary power, so they are expected to guarantee legal certainty for the parties involved in land transactions.³ However, reality shows that many deeds made by PPAT are legally flawed, especially when the deed is based on invalid or unqualified evidence.

One example of a case that often occurs is the use of Land and Building Tax Notification Letter (SPPT PBB) as the basis for making a deed of sale and purchase. Although SPPT PBB has an important function in the taxation system, this document cannot be used as proof of legal land ownership. This causes many deeds of sale and purchase made by PPAT to be invalid and not

¹ Angelina Bernadina Linojawa Keban, "Dispute Due to Termination of Cooperation Between PT. Sarana Investama Manggabar and the Province of East Nusa Tenggara," *Bureaucracy Journal: Indonesia Journal of Law and Social-Political Governance* 2, no. 2 (2022): 649–66, <https://doi.org/10.53363/bureau.v2i2.94>; Kartini Siahaan, "Legal Position of Notarial Deeds as Evidence in Criminal Acts of Forgery of Documents in the Criminal Justice Process," *Recital Review* 01, no. 02 (2019): 72–88.

² Taufika Hidayati and Yulia Tiara Tanjung, "Legal Review of Land Sale and Purchase Based on Sub-district Head's Certificate Through Notary," *All Fields of Science Journal Liaison Academia and Society* 2, no. 2 (June 15, 2022): 402–12, <https://doi.org/10.58939/afosj-las.v2i2.271>; Meisya Adistia, "Accountability of Land Deed Officials for the Validity of Sale and Purchase Deeds," *Unes Law Review* 6, no. 3 (2024): 8015–25.

³ Afirna Dias Maharani, Budi Santoso, and Fifiana Wisnaeni, "Responsibility of Land Deed Officials for Violations of the Code of Ethics in Carrying Out Their Profession," *Notarius* 14, no. 1 (March 12, 2021): 39–46, <https://doi.org/10.14710/nts.v14i1.37600>.

binding.⁴ Failure to comply with legal provisions in making deeds can have implications for land disputes in the future, which has the potential to cause losses for parties who have rights to the land.

Land disputes involving these legally defective deeds are becoming increasingly complex in the Indonesian legal system, where parties often have to fight in court to prove their rights. District courts are often faced with difficult decisions, considering that legally defective deeds not only harm the party claiming ownership of the land, but also create legal uncertainty for the public in general.⁵ In some cases, a court decision may invalidate a deed that has been made, resulting in financial and social losses for the parties involved.

This study aims to analyze the legal force of deeds made by PPAT that are legally flawed, with a focus on the legal implications of the use of PBB evidence in making deeds of sale and purchase. Using a normative approach and case analysis, this study will evaluate court decisions related to violations by PPAT and their impact on legal certainty in land transactions. In addition, this study will also discuss the factors that cause legal flaws in deeds, as well as the steps that need to be taken to improve the quality of deed making by PPAT.⁶

The results of the study are expected to provide recommendations for improving PPAT practices, increasing public understanding of legal certainty in the land sector, and encouraging strengthening regulations and supervision of PPAT practices in Indonesia. In addition, this study also aims to contribute to the land

⁴ Rahmia Rachman, Ahmad Aswar Rowa, and Hasnawati Hasnawati, "PPAT's Accountability for False Information in Making Land Sale and Purchase Deeds," *DiH: Jurnal Ilmu Hukum*, August 29, 2022, 234–44, <https://doi.org/10.30996/dih.v0i0.6671>.

⁵ Andina Alfia Rizqi, "Legal Protection of Land Certificate Owners in the Event of Errors in Issuance Data (Case Study at the Semarang City Land Office)," *NOTARIUS* 11, no. 2 (November 12, 2018): 141, <https://doi.org/10.14710/nts.v11i2.23459>; Selamat Lumbon Gaol, "Position and Power of the Deed of the Land Deed Making Official in the Evidence System Based on National Land Law," *Jurnal Ilmiah Hukum Dirgantara* 10, no. 1 (2019): 3.

⁶ Hidayati and Tanjung, "Legal Review of Land Sale and Purchase Based on Sub-District Head's Certificate Through Notary"; Annisa Nur Azizah and Liza Priandhini, "Legal Standing Jurnal Ilmu Hukum Responsibility of Land Deed Making Officials (Ppat) Towards Parties Providing False Information," *Legal Standing* 7, no. 1 (2023): 2580–3883.

law literature in Indonesia, especially in the context of the regulation and practice of making authentic deeds by PPAT.

Thus, it is expected that this study can provide deeper insight into the legal issues related to land ownership and the role of PPAT in providing legal certainty. This study is also expected to assist related parties, including the government and legal institutions, in formulating more effective policies and strategies to address land issues in Indonesia. Along with the development of the era and the complexity of land issues, it is important for all parties to work together in creating a fair, transparent, and accountable legal system in land management.⁷

2. Research Methods

The research method used is a normative research method with a statutory and conceptual approach. This study will analyze documents and case studies, including court decisions stating that PPAT has committed an unlawful act. The analysis method will be carried out through legal interpretation which is an important approach in understanding and applying legal norms.

3. Results and Discussion

3.1. Legal Certainty of Deeds from Land Deed Making Officials (PPAT) Made Based on Land and Building Tax Evidence

The legal certainty of the deed made by the Land Deed Making Officer (PPAT) is crucial in guaranteeing land rights. The deed produced by the PPAT should be a valid and reliable evidence in every land transaction. However, in reality, many deeds are legally flawed, especially those based on evidence of Land and Building Tax (PBB) such as the Tax Payable Notification Letter (SPPT).⁸

The deed made by PPAT has high evidentiary power, in accordance with the provisions stipulated in UUPA and related regulations. According to Article 19 UUPA, PPAT is responsible for preparing a deed that reflects legal acts related to

⁷ Dedi, I Nyoman Gede Sugiarta, and IG. AA Gita Pritayanti Dinar, "Legal Analysis of the Principle of Actori Incumbit Onus Probandi in Proving the Criminal Act of Spreading Fake News (Study of Tangerang District Court Decision Number 1240/PID.SUS/2022/PN.Tangerang)," *Journal of Legal Analogy* 5, no. 3 (2023): 263–68.

⁸ Hidayati and Tanjung, "Legal Review of Land Sale and Purchase Based on Sub-district Head's Certificate Through a Notary."

the transfer of land rights.⁹ However, when the deed is based on invalid evidence, such as SPPT, then the evidentiary power of the deed becomes doubtful.

SPPT, although it functions as proof of tax, does not have legal force to prove land ownership. This is reinforced by the decision of the District Court which confirms that deeds made based on SPPT are considered invalid and not binding (Rachman et al., 2022). Thus, the use of SPPT as a basis for making a deed of sale and purchase is problematic and has the potential to cause disputes in the future. Legal defects in the deed made by the PPAT can have serious implications for all parties involved. Non-compliance with legal provisions in making a deed can result in prolonged disputes in court.¹⁰ In many cases, landowners feel disadvantaged because they cannot prove their rights legally, and have to fight in court to get justice.

Land disputes involving legally defective deeds can cause significant financial losses, both for the party claiming ownership of the land and for the PPAT itself. The court has the authority to annul a legally defective deed, which causes the deed to lose its legal force.¹¹ In addition, PPAT can also be subject to legal sanctions if proven to have committed violations in making the deed.

To improve legal certainty in deeds made by PPAT, several steps need to be taken. First, PPAT must be more thorough in verifying all documents used as the basis for making the deed. This includes ensuring that the evidence of ownership used meets the requirements specified in the laws and regulations.¹² Second, training and socialization regarding the latest regulations related to PBB and land registration need to be carried out routinely to improve PPAT

⁹ Anajeng Esri Edhi Mahanani, "Legal Paradigm of the Benefit and Appropriateness of a Legal Product That Experiences Absolute Void," *Widya Pranata Hukum: Journal of Legal Studies and Research* 2, no. 2 (2021): 61–74, <https://doi.org/10.37631/widyapranata.v2i2.244>.

¹⁰ Nur Azizah and Priandhini, "Legal Standing Journal of Legal Studies Responsibility of Land Deed Making Officials (Ppat) Towards Parties Who Provide False Information."

¹¹ Dedi, Sugiarta, and Dinar, "Legal Analysis of the Principle of Actori Incumbit Onus Probandi in Proving the Criminal Act of Spreading Fake News (Study of Tangerang District Court Decision Number 1240/PID.SUS/2022/PN.Tangerang)."

¹² Hidayati and Tanjung, "Legal Review of Land Sale and Purchase Based on Sub-district Head's Certificate Through a Notary."

understanding.¹³With a better understanding, it is hoped that PPAT can avoid mistakes that can result in legal defects in the deed. Third, stricter supervision from the authorities on PPAT practices is also needed. The government and related institutions must conduct periodic evaluations of PPAT performance and provide strict sanctions for PPATs who violate the law, to maintain the integrity and public trust in the land registration system.¹⁴

The legal certainty of the deed made by the PPAT plays an important role in guaranteeing land rights. However, the use of PBB evidence such as SPPT as the basis for making a deed can cause serious legal problems. Therefore, concrete steps are needed to improve the practice of PPAT and increase understanding and compliance with applicable regulations. Thus, it is hoped that a fair, transparent, and accountable land registration system can be created, which will ultimately reduce disputes and increase public trust in land law in Indonesia.

3.2 Analysis of Bekasi District Court Decision Number 446/Pdt.G/2012/PN Bks. regarding Unlawful Acts by PPAT

Position Case

The case handled by the Bekasi District Court involved a Land Deed Making Officer (PPAT) who was accused of committing an unlawful act in making a land sale and purchase deed. Defendant III, who acted as PPAT, issued a sale and purchase deed based on evidence of Land and Building Tax (PBB), namely the Tax Payable Notification Letter (SPPT). Although this document is important in the taxation system, the court considered that the SPPT could not be used as evidence of legal land ownership.

In the decision, the court stated that the deed of sale and purchase made by the PPAT was legally flawed and not binding. The plaintiff, who claimed rights to the land involved in the dispute, suffered losses due to the control of the land carried

¹³ Maharani, Santoso, and Wisnaeni, "Responsibility of Land Deed Officials for Violations of the Code of Ethics in Carrying Out Their Profession."

¹⁴ Rizqi, "Legal Protection for Land Certificate Owners in the Event of Errors in Issuance Data (Case Study at the Semarang City Land Office)."

out by defendants I and II, which was based on an invalid deed. The court emphasized the importance of PPAT's compliance with legal provisions in making deeds, as well as the legal responsibilities inherent in the position.

The court decision shows that the unlawful actions of PPAT can be subject to sanctions and accountability. This is a reminder that the deeds issued by PPAT must meet all legal requirements in order to provide legal certainty for the parties involved. Thus, the Bekasi District Court decision serves as a precedent that emphasizes the need for integrity and accuracy in the making of deeds by PPAT, as well as providing legal protection for the injured parties.

Decision Analysis

The Bekasi District Court's decision on a case involving a Land Deed Making Officer (PPAT) reflects the importance of compliance with legal provisions in making authentic deeds. In this case, the third defendant, who acted as PPAT, was deemed to have committed an unlawful act by issuing a deed of sale that did not meet the stipulated requirements.¹⁵This reminds us that a legally flawed deed can cause serious problems in land ownership.

First, the root of this problem lies in the use of the Land and Building Tax Notification Letter (SPPT) as the basis for making a deed of sale and purchase. SPPT, although it functions as a tax document, cannot be used as proof of legal ownership of a plot of land. In agrarian law, a deed made based on invalid evidence can be considered unbinding.¹⁶Therefore, the court's decision stating that the deed is null and void is absolutely correct.

Second, the court considered that the deed of sale and purchase made based on the SPPT was not only legally flawed but also detrimental to the party claiming the rights. The plaintiff in this case suffered significant losses due to the control of the land carried out by defendants I and II, which was based on the legally

¹⁵ Rachman, Rowa, and Hasnawati, "PPAT's Accountability for False Information in Making Land Sale and Purchase Deeds."

¹⁶ Sedy Salsabila Saifuddin and Yulia Qamariyanti, "Legal Certainty of Land Ownership Certificates Upon the Issuance of Land Certificates on the Same Land Object," *Notary Law Journal* 1, no. 1 (2022): 31–48, <https://doi.org/10.32801/nolaj.v1i1.2>.

flawed deed. This is in line with the provisions of Article 1365 of the Civil Code which states that every act that causes harm to another person must be compensated by the guilty party.¹⁷

Furthermore, the court also highlighted the role of PPAT in maintaining the integrity and accuracy of the documents made. As a public official who has legal responsibility, PPAT must ensure that all applicable terms and conditions are complied with. In this case, Defendant III failed to carry out adequate verification of the documents used as the basis for making the deed, resulting in the issuance of a legally flawed deed.¹⁸

The court's decision to annul the deed of sale also reflects the importance of legal protection for the injured party. In the legal system, every individual has the right to obtain justice, and this decision sends a signal that violations of the law in the making of deeds will not be tolerated.¹⁹This is also a reminder for other PPATs to be more careful in carrying out their duties.

In legal assessment, the authority aspect is also important. PPAT, as a public official, has clear authority in making deeds, but this authority must be carried out with full responsibility. The court emphasized that PPAT's actions that violate the law can be subject to sanctions and legal accountability.²⁰This shows that even though PPATs have legal power, they are not immune from legal action.

The importance of transparency and accountability in the making of authentic deeds is also emphasized in this decision. The public must be able to trust that the deeds issued by PPAT are legal and valid. Errors in making deeds caused by

¹⁷ Mahanani, "Legal Paradigm of the Benefit and Appropriateness of a Legal Product that Experiences Absolute Invalidity."

¹⁸ Nur Azizah and Priandhini, "Legal Standing Journal of Legal Studies Responsibility of Land Deed Making Officials (Ppat) Towards Parties Who Provide False Information."

¹⁹ Khairunnisa Riani Putri and Mella Ismelina Farma Rahayu, "Analysis of Legal Protection of Notaries and Ppat in Making Deeds Based on False Information (Case Study of Decision Number: 73/PDT.G/2012/PN.PL)," *Jurnal Sosial Teknologi* 3, no. 6 (June 26, 2023): 513–29, <https://doi.org/10.59188/jurnalsostech.v3i6.812>.

²⁰ Romi Ardiansyah, Imam Asmarudin, and Tiyas Vika Widyastuti, "Legal Review of Unlawful Acts in Cases of Transfer of Land Rights with Ownership Certificates," *Pancasakti Law Journal* 01, no. 02 (2023): 267–78, <https://plj.fh.upstegal.ac.id/index.php/plj/article/view/31%0Ahttps://plj.fh.upstegal.ac.id/index.php/plj/article/download/31/26>.

negligence or non-compliance with the law can damage public trust in the land law system.²¹

Thus, the Bekasi District Court's decision provides a clear example of the consequences of violating the law in making deeds. This decision not only impacts the parties involved in the dispute, but also serves as a lesson for other PPATs to improve the quality and accuracy of their work.²² This is important to avoid prolonged land disputes in the future.

This decision emphasizes the importance of the role of PPAT in creating legal certainty in the land sector. By carrying out their duties in accordance with applicable provisions, PPAT can help reduce land disputes and increase public trust in the land registration system in Indonesia. This reflects that compliance with the law is not only an obligation, but also a moral responsibility for every public official.

Analysis of this decision shows that consistent and firm law enforcement against violations in the making of deeds is very necessary to create a fair and transparent legal system. By prioritizing compliance with the law, it is hoped that a conducive environment will be created for the community in carrying out land transactions safely and reliably.²³

4. Conclusion

This study shows that the legal certainty of deeds made by Land Deed Officials (PPAT) is greatly influenced by the validity of the documents used as the basis for making the deed. The case handled by the Bekasi District Court underlines the importance of strict verification of documents, such as Land and Building Tax Notification Letters (SPPT), which cannot be used as evidence of legal land ownership. The court decision stating that the sale and purchase deed was

²¹ Sri Wulan, Hasrul, and Ilham Arisaputra, "Legal Responsibility of Land Deed Officials for the Loss of the First Page of the Deed," *Widya Pranata Hukum* 4, no. 1 (2022): 1–14, <http://ejournal.widyamataram.ac.id/index.php/pranata/article/view/554%0Ahttps://ejournal.widyamataram.ac.id/index.php/pranata/article/download/554/298>.

²² Indah Sari, "Unlawful Acts (PMH) in Criminal Law and Civil Law," *Scientific Journal of Aerospace Law* 11, no. 1 (2020): 53–70, <https://doi.org/10.35968/jh.v11i1.651>.

²³ Dewi Rasda et al., "Responsibilities of Land Deed Officials (PPAT) in Registering Transfer of Land Ownership Rights," *Amsir Litigation Journal* 9, no. 1 (2021): 34–40, <http://journalstih.amsir.ac.id/index.php/julia/article/view/55/47>.

legally flawed confirms that violations in the deed making process can have serious consequences, both for PPAT and the parties involved in the land transaction. This study also emphasizes the need for increased supervision and accountability of PPAT practices to prevent future disputes. By increasing PPAT's understanding of existing regulations and implementing strict sanctions for violations, it is hoped that a fairer and more transparent land registration system will be created. This is important to maintain public trust in land law in Indonesia and ensure that every land transaction can be carried out with strong legal certainty.

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