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Responsibilities of The Land Deed Making...
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# Responsibilities of The Land Deed Making Official (PPAT) for Deeds of Sale and Purchase of Land Which Cause Disputes

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Abstract. The high strategic value of land makes it prone to disputes, so Land Deed Officials (PPAT) are required to understand land law in depth so that the deeds they make are legally valid and avoid legal conflicts due to misuse of transfer of rights. This study aims to analyze the importance of understanding land law for Land Deed Officials (PPAT) in ensuring the validity of land transfer deeds and preventing disputes due to misuse of land transactions. The type of research used is doctrinal research with a legislative and theoretical approach. Secondary data consists of primary, secondary, and tertiary legal materials. The data analysis method used is perspective analysis, which involves systematically compiling the data and then analyzing it descriptively and qualitatively to gain clarity on the research problem. The research results state that Land Deed Officials (PPAT) play a crucial role in ensuring the validity of land transactions through the preparation of authentic deeds, document verification, and registration with the National Land Agency, and are obligated to reject the issuance of deeds if there are disputes, incomplete documents, or indications of legal violations. Land disputes caused by duplicate certificates, unclear boundaries, illegal transactions, and slow settlement processes can be prevented by PPATs through proper procedures, and violations by PPATs can result in legal sanctions. Dispute resolution can be carried out non-penally through mediation and deliberation, or penally through the courts, in order to achieve legal certainty and fair protection for all parties.

Keywords: Disputes; Land Deed Making Official (PPAT); Land Rights.

## 1. Introduction

Transfer of land rights is the transfer of land rights from the old rights holder to the new rights holder. There are 2 (two) ways of transferring land rights, namely transfer and assignment. After the enactment of the Basic Agrarian Law (UUPA), the transfer of land rights is based on Government Regulation Number 10 of 1961 concerning Land Registration as amended by Government Regulation Number 24 of 1997 concerning Land Registration. The transfer of land and objects on it is carried out with an authentic deed made by the Land Deed Official (PPAT).

The transfer of land from the owner to the recipient is accompanied by a legal handover (juridiche levering), namely a handover that must fulfill legal formalities, including fulfilling the requirements, carried out through established procedures, using documents made by/before the Land Deed Making Officer (PPAT).¹The transfer of land rights is carried out by deed. A deed is a writing that is deliberately made by a certain party which can be used as evidence and is included as a form of written evidence if an undesirable event occurs, such as a dispute. The deed was also signed as valid evidence in Article 1866 of the Civil Code.

The transfer of land rights from the owner to the recipient is followed by a legal handover, namely the fulfillment of legal formalities. Registration of the transfer or encumbrance of land rights must fulfill several requirements in accordance with Article 34 paragraph (3) of Government Regulation Number 24 of 1997. The certificate or letter of information regarding the land must be in accordance with the data at the Land Office. The legal act referred to in Article 37 paragraph (1) must be proven by a deed from the Land Deed Making Officer (PPAT) or an extract of the auction minutes in accordance with the provisions in Article 41, except in certain circumstances as regulated in Article 37 paragraph (2). The documents submitted must be complete and comply with the provisions of applicable laws and regulations. The land must also not be the object of a dispute in court. The deed from the Land Deed Making Officer (PPAT) used must be valid and not be canceled by a court decision that has permanent legal force. In addition, the legal act may not be canceled by the parties before registration at the Land Office. The documents submitted must be complete and comply with the provisions of applicable laws and regulations.

The high level of land buying and selling activity is often exploited by irresponsible individuals through fraud and land rights disputes, due to a lack of understanding of the legal rights transfer process. Victims can obtain legal protection through civil liability, demanding the return of their rights, or through criminal liability. This criminal liability can take the form of penalties (penal) or non-penal, such as the application of Article 14C of the Criminal Code (KUHP),

<sup>&</sup>lt;sup>1</sup>Abdulkadir Muhammad, 1994, Property Law, First Edition, Citra Aditya Bakti, Bandung, pp. 55-56.

which allows for conditional payments as a form of criminal compensation for land. This can be seen in Semarang District Court Decision Number 79/Pdt.G/2021/PN Smg, which ruled that the issuance of a land title certificate was legally invalid because it was based on invalid documents. Consequently, the deed drawn up by the Land Deed Official (PPAT) as the basis for the transfer of land rights is invalid and subject to cancellation. This decision emphasizes that the validity of a PPAT deed depends heavily on the validity of the supporting documents and the legal procedures followed. If the legal basis for issuing the certificate is flawed, the associated PPAT deed also loses its legal force and cannot be used to legally transfer land rights.

Therefore, Land Deed Officials (PPAT) must have sufficient understanding of the land sector to be able to exercise their authority to issue land deeds, thus avoiding future problems, as the deeds they issue will serve as valid evidence. Based on the above description, the researcher is interested in raising this issue in a study.

# 2. Research Methods

The type of research used is doctrinal research with a legislative and theoretical approach. The data sources used are secondary data consisting of primary, secondary, and tertiary legal materials. The data analysis method employed is perspective analysis, which involves systematically compiling the data and then analyzing it descriptively and qualitatively to gain clarity on the research problem.

## 3. Results and Discussion

# 3.1. Responsibilities of Land Deed Drafting Officials (PPAT) regarding Deeds of Sale and Purchase of Land that Give rise to Disputes

The Land Deed Making Officer (PPAT) is a public official who is given authority byregulationlegislation to create authentic deeds regarding certain legal acts related to land rights or Ownership Rights for Apartment Units (HM-SRS).Land Deed Making Official (PPAT) is tasked with carrying out some of the state's functions in the land sector, and every deed they create has strong evidentiary force as authentic evidence in legal proceedings. In carrying out these duties, PPATs cannot be separated from the principle of legal responsibility.<sup>4</sup>

Judging from their characteristics, land rights have varying legal elements. This primarily relates to formal and material requirements, procedures, and

<sup>&</sup>lt;sup>2</sup>Said Ilham Putra Phoenna. 2020. Responsibility of Notaries/Land Deed Officials for Sale and Purchase Deeds that are Made and Give Rise to Land Disputes. Thesis, Ar-Raniry State Islamic University. Banda Aceh. Page 2.

<sup>&</sup>lt;sup>3</sup>Semarang District Court Decision Number 79/Pdt.G/2021/Pn Smg

<sup>&</sup>lt;sup>4</sup>Boedi Harsono, Indonesian Agrarian Law, History of the Formation of the Basic Agrarian Law, Contents and Implementation, Djamban, Jakarta, 2003, p. 486

mechanisms, which are highly dependent on the nature or circumstances of the subject and object of the rights. The primary requirement for land ownership is written evidence, namely a certificate for registered land, or supporting evidence for uncertified land. Transferring land rights means transferring ownership of those rights to another party, thereby transferring those rights from the previous owner to the recipient. This transfer of rights can occur for two reasons: a legal event and a legal act.<sup>5</sup>

The implementation of the sale and purchase of land rights must fulfill the requirements for a valid agreement as stipulated in Article 1320 of the Civil Code, which includes four main elements, namely agreement of the parties; legal capacity to make an agreement; the existence of a specific object agreed upon; and a lawful cause. The transfer of land ownership rights is carried out through legal transfer (juridische levering). As stipulated in Article 26 of Law Number 5 of 1960, the sale and purchase of land rights is made using a deed from a Land Deed Making Official (PPAT) as the main requirement for land registration at the Land Office according to the location of the land rights object. So the Land Deed Making Officer (PPAT) has the responsibility to protect the parties involved in land transactions from possible errors or abuse of the law.

Land Deed Officials (PPAT) can provide legal advice by explaining each party's rights and obligations and ensuring that transactions are carried out in accordance with applicable laws. Land Deed Officials (PPAT) also play a role in mitigating the risk of land disputes through document inspections, public record reviews, and careful drafting of Land Deeds. This allows PPATs to identify potential disputes or legal issues related to land ownership.

In line with AP Parlindungan's opinion that the PPAT's task is to carry out recording of deeds of conveyance, namely recording the creation of land deeds which include transfer of rights, binding of collateral with land rights as Mortgage Rights, establishing new rights on a plot of land (Building Use Rights over Ownership Rights) plus installing a power of attorney to install Mortgage Rights.<sup>8</sup>

AA Andi Prajitno also stated that the Land Deed Making Official's Deed is an authentic deed containing the transfer and encumbrance of land rights and ownership rights to apartment units as written evidence that is directly related to the law of evidence and is part of Civil Law.

Referring to this opinion, the existence of a Land Deed Official (PPAT) as an official who ensures the formal validity of land sale and purchase deeds is a

<sup>&</sup>lt;sup>5</sup> I Ketut Oka Setiawan..2021.Contract Law.Sinar Grafika Jakarta, p. 158.

<sup>&</sup>lt;sup>6</sup>Article 1320 of the Civil Code

<sup>&</sup>lt;sup>7</sup>Baharudin, "The Authority of Land Deed Officials (Ppat) in the Land Sale and Purchase Process," Progressive Justice, Vol. 5, No. 1, 2014, pp. 88–97

<sup>&</sup>lt;sup>8</sup>Taufan Fajar Riyanto. 2023. Complete Guide to Smartly Learning the Law of the Ppat-An. Blue Ocean. Semarang. Page 212

manifestation of the principle of legal certainty. PPATs play a crucial role as public officials authorized to issue authentic deeds related to the transfer of land rights, whose duties extend beyond administrative duties. They are also closely related to legal protection and formal certainty for the parties. The PPAT's obligations are regulated in detail in various laws and regulations, including ensuring the certainty of the date of the deed's creation; the identities of the parties; and the authenticity of signatures.

However, in practice, Land Deed Officials (PPAT) do not always request supporting evidence for the parties' statements. For example, if a buyer owns land exceeding the maximum limit or more than five certificates, the sanction imposed is only an obligation to pay additional fees to the National Land Agency (BPN) or the Land Office, without any clarity on the amount. This condition is contrary to the spirit of land ownership regulations in the national agrarian policy, because land ownership that exceeds the limit can harm the public interest; land that exceeds the provisions should be returned to the state to be distributed fairly according to the principles of social justice. In addition, when drawing up a deed, the PPAT is required to ensure that the land being the object of the sale and purchase is not disputed land and includes the types of rights permitted for sale, as expressly regulated in the Basic Agrarian Law (UUPA), including Ownership Rights (Article 20), Cultivation Rights (Article 28), Building Rights (Article 35), and Use Rights (Article 41). Carefulness and clarity in the contents of the deed are very important to ensure legal certainty and prevent violations of the principles of land control and ownership.<sup>9</sup>

A Land Deed Official (PPAT) is not only required to follow formal procedures but also to consider the substance and morality of the law. Failure to exercise authority carefully can create legal uncertainty, disrupt the law's function as a protector of the public, and harm related parties. According to Ridwan Halim, legal responsibility is the consequence of fulfilling a role encompassing rights, obligations, and powers. Violations require the relevant party to bear the consequences, including the obligation to compensate for losses.<sup>10</sup>

The negligence of the Land Deed Official can be seen in Semarang District Court Decision Number 79/Pdt.G/2021/PN Smg, which concludes that land title certificates issued based on invalid documents are legally flawed and lose their legal force. In this case, the party claiming land rights apparently does not have legal rights to the disputed land object, so the certificate issued cannot be used as a legal basis for controlling or transferring land rights. This decision emphasizes that the documents used as the basis for issuing certificates must be truly legal and valid, in accordance with the principles of the requirements for valid agreements as stipulated in Article 1320 of the Civil Code (KUHPerdata). In

<sup>&</sup>lt;sup>9</sup>Taufan Fajar Riyanto. 2023. Complete Guide to Smart Learning of Ppat-An Law. Blue Ocean. Semarang. Page 290

<sup>&</sup>lt;sup>10</sup> Salim HS2008.Introduction to Written Civil Law (BW).PT. Sinar Grafika, Jakarta.Page 45

addition, the act of falsifying the documents underlying the issuance of the certificate also violates criminal provisions, namely Articles 263 and 266 of the Criminal Code concerning the crime of document forgery.<sup>11</sup>

The legal consequences of issuing a defective certificate are that the certificate must be cancelled or declared legally invalid, and the land rights must be returned to the entitled party based on valid evidence and legal decisions, as regulated in Article 1365 of the Civil Code concerning unlawful acts and Government Regulation Number 24 of 1997 concerning Land Registration. This case underscores the importance of careful verification and validation of documents in the certificate issuance process to avoid future legal disputes and provide legal certainty for all parties involved.<sup>12</sup>

Accountability encompasses both liability and responsibility. Liability refers to the nature of risk or responsibility. Responsibility means being accountable for an obligation, including decisions.<sup>13</sup> Philipus M. Hadjon said that against Land Deed Making Officials (PPAT) who have committed legal violations, they can also be held accountable including:<sup>14</sup>

- 1. Administrative Responsibilities
- 2. Civil Liability
- 3. Criminal Responsibility

Land Deed Officials (PPAT) have three forms of accountability. First, administrative responsibility, where violations can be subject to sanctions ranging from written warnings to permanent dismissal in accordance with Articles 7 and 8 of Government Regulation Number 37 of 1998. Second, civil liability based on Articles 1365-1367 of the Civil Code requires PPATs to compensate for losses due to negligence, errors, or unlawful acts, including forgery of deeds. Third, criminal responsibility if there is an element of intent, such as falsification of documents or abuse of authority, PPATs can be subject to criminal sanctions in accordance with Articles 264 and 266 of the Criminal Code by taking into account the subjective and objective elements of the actions taken.

Based on the discussion above, it can be concluded that the Land Deed Making Officer (PPAT) is a public official who is authorized by statutory regulations to

<sup>&</sup>lt;sup>11</sup>Semarang District Court Decision Number 79/Pdt.G/2021/PN Smg

<sup>&</sup>lt;sup>12</sup>Kholida, Putra Halomoan Hasibuan, Muhammad Reza Alamsyah, Ade Fitri Ramadani, Amil Keramat, 2024, Notaries and Ppat in Indonesia Application of Theory and Practice in Making Deeds, Semesta Aksara, Yogyakarta, p. 32

<sup>&</sup>lt;sup>13</sup>Jimly Asshddiqie, M.Ali Safaat, Et.Al.2006. Hans Kelsen's Theory of Law.Jakarta: Secretariat General of the Registrar's Office of the Constitutional Court of the Republic of Indonesia.Jakarta.Page 60

<sup>&</sup>lt;sup>14</sup>Widyo Pramono, 2012, Criminal Liability of Copyright Corporations, Pt. Alumni, Bandung, p. 83

make authentic deeds related to certain legal acts regarding land rights or Ownership Rights for Apartment Units (HM-SRS). The position of PPAT is very important because the deeds made by him have perfect evidentiary power and become the legal basis for land registration at the National Land Agency (BPN). In exercising his authority, PPAT is bound by the principle of legal responsibility, namely the obligation to bear the legal consequences if there is an error or negligence in making a deed that can give rise to a dispute.

# 3.2. Efforts to Resolve Disputes Regarding Land Rights Disputes

A dispute is a difference of interest between individuals or institutions regarding the same object, which arises in the relationship between them. Conceptually, conflict is broader because it includes latent disputes and those that have emerged, while disputes are conflicts that have become apparent, for example through lawsuits in court or demonstrations. In land law, the term land is used juridically based on Article 4 of the Basic Agrarian Law (UUPA), which stipulates the state's right to control and various types of land rights. The typology of land disputes according to Maria Sumardjono includes control and ownership, determination of rights and registration, land boundaries/location, compensation for former private land, customary land, land reform objects, land acquisition/procurement, and implementation of court decisions. Factors causing disputes include dual certificate ownership, incomplete registration processes, unclear land boundaries, underhand sales and purchases, slow dispute resolution, and land mafia practices. 15

Land mafia practices cause individual losses, legal uncertainty, and hinder investment and development. Perpetrators can face severe penalties of up to 20 years in prison under the Criminal Code. This can be seen in land disputes in Demak, which were triggered by multiple land titles; incomplete registration; unclear land boundaries; informal sales; and slow dispute resolution. To mitigate these conflicts, transparency in land registration and strong law enforcement are needed, in line with the principle of the Basic Agrarian Law (UUPA), which prohibits excessive land ownership that harms the public interest.

Land Deed Officials (PPAT) play a crucial role in ensuring the validity of deeds, protecting the parties involved, providing legal advice, reviewing documents, and identifying potential disputes to prevent future conflicts. Deeds prepared by PPATs serve as evidence of the parties' contractual legal actions, and therefore, PPATs are not solely responsible for the material accuracy of documents provided by other parties, unless proven to have knowledge or involvement in the submission of false data. Based on Article 55 of the Criminal Code, if PPATs are found to be involved in a crime related to false documents, they may be

<sup>&</sup>lt;sup>15</sup> Nita Triana. 2019. Alternative Dispute Resolution Using Mediation, Arbitration, Negotiation, and Conciliation Models. Kaizen Educational Facilities. Yogyakarta. Page 10

subject to criminal sanctions with an adjusted prison sentence of up to fifteen years..<sup>16</sup>

Land Deed Officials (PPAT) are required to report disputes to the land office along with supporting documents, the complainant's identity, proof of ownership, relevant data, and the chronology of the dispute in accordance with Article 3 of the Regulation of the Minister of ATR/BPN Number 21 of 2020. The theory of legal certainty emphasizes that land dispute resolution must ensure certainty of the subject of rights, objects of rights, and fair, transparent, and protected procedures through land registration and issuance of certificates. The principle of contradictoire delimitatie, namely agreement on land boundaries between parties, is an important principle to prevent overlapping certificates..<sup>17</sup>

The theory of legal responsibility asserts that each party is responsible for their actions in civil, criminal, and state administrative matters, with sanctions in the form of compensation, certificate cancellation, or criminal penalties if proven to violate the law. Satjipto Rahardjo emphasized that a valid land sale and purchase agreement provides legal protection to the buyer, in accordance with the principle of pacta sunt servanda, so that the agreement serves as evidence and provides legal certainty even though its evidentiary force is not yet perfect. Thus, buyers who transfer land rights through a sale and purchase are entitled to legal protection regarding land registration and the validity of the agreement. <sup>18</sup>

Based on the opinions of experts and the literature reviewed in this paper, the author is of the opinion that the buyer who enters into a land transfer agreement through a sale and purchase has the right and is obliged to obtain legal protection regarding the registration of the land in question. In accordance with Article 6 paragraph (2) of Law Number 30 of 1999 concerning Arbitration and Alternative Dispute Resolution, dispute resolution can be carried out through deliberation or negotiation (non-penal), in addition to through the arbitration or court process (penal). In the context of land rights disputes, Law Number 5 of 1960 concerning Basic Agrarian Principles (UUPA) stipulates that settlement by deliberation and consensus (non-penal) is the main principle, and if deliberation does not reach an agreement, the settlement can be continued through litigation (penal). Thus, efforts to resolve land rights disputes include non-penal and penal mechanisms in accordance with applicable legal provisions:<sup>19</sup>

# 1. Non-Penal Efforts

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<sup>&</sup>lt;sup>16</sup>Sudarto, Law and Criminal Law, 5th edition. Pt Alumni, Bandung. 2007, p. 45.

<sup>&</sup>lt;sup>17</sup> Boedi Harsono, 1999, Indonesian Agrarian Law: History of the Formation of the Basic Agrarian Law, Djambatan Boedi, Jakarta, p. 30

<sup>&</sup>lt;sup>18</sup>Abdul Atsar, Indonesian Contract Law (In a Comparative Legal Approach), PT. Rajagrafindo Persada, Depok, 2018, p. 35

<sup>&</sup>lt;sup>19</sup> Nita Triana. 2019. Alternative Dispute Resolution Using Mediation, Arbitration, Negotiation, and Conciliation Models. Kaizen Educational Facilities. Yogyakarta. P. 154

Efforts to resolve land rights disputes non-penally at the Land Office are carried out using an approach that prioritizes:

- a. Deliberation for consensus,
- b. Mediation and administrative facilitation.

Based on Regulation of the Minister of ATR/Head of the National Land Agency Number 21 of 2020, non-penal mechanisms at the Land Office include dispute reporting, case classification, mediation, and the preparation of peace agreements and registration of decisions. Settlement is based on the principle of deliberation for consensus, prioritizing peace and social justice, with the Land Office conducting field investigations, verifying documents, and providing recommendations based on facts and applicable legal provisions.

# 2. Penal Efforts (Litigation)

Penal (litigation) land dispute resolution is a settlement process through formal legal channels in court when peaceful or non-penal settlement efforts are unsuccessful. The court process is through the court. The court in question is a general court which, based on Article 25 paragraph (2) of Law Number 48 of 2009 concerning Judicial Power, has the authority to examine, try, and decide criminal and civil cases in accordance with the provisions of statutory regulations. Settlement of land rights disputes through litigation (non-penal) efforts can be through:<sup>20</sup>

- a. General courts
- b. State administrative court.<sup>21</sup>

Based ondiscussionIt is concluded above that Land Deed Officials (PPAT) play a crucial role in preventing disputes by creating authentic deeds, carefully verifying documents, and registering deeds at the Land Office or BPN. However, they can be subject to sanctions if proven to be involved in data falsification. Dispute resolution is carried out non-penal through deliberation, mediation, and negotiation. And administrative facilitation, or through penal/litigation proceedings through general courts and State Administrative Courts. The primary goal of all these efforts is to ensure legal certainty over land rights and objects and to provide fair legal protection, so integration between prevention through Land Deed Officials (PPAT) and dispute resolution mechanisms is essential.

<sup>&</sup>lt;sup>20</sup>Nita Triana. 2019. Alternative Dispute Resolution Using Mediation, Arbitration, Negotiation, and Conciliation Models. Kaizen Educational Facilities. Yogyakarta. P. 155

<sup>&</sup>lt;sup>21</sup>Muhammad Irsyad Abdullah, Study of Land Dispute Resolution Through Litigation in Mariso District, Makassar City, Uin Alauddin Thesis, 2014.

#### 4. Conclusion

Based on the research results and discussion, it can be concluded that Land Deed Officials (PPAT) play a crucial role in ensuring the validity of land transactions through the preparation of authentic deeds, document verification, and registration at the National Land Agency (BPN). PPATs are required to reject deeds if the land is in dispute, documents are incomplete, or there are indications of legal violations, and to report forged documents or problematic status. Land disputes arise in various forms, often triggered by duplicate certificates, incomplete registration, unclear land boundaries, transactions, and land mafia practices. PPATs play a role in preventing disputes, but negligence or involvement in forgery gives rise to legal liability. Dispute resolution can be carried out through mediation, deliberation, or litigation, with the primary goal of ensuring legal certainty and fair protection. Therefore, the government needs to strengthen regulations and digitalization, while PPATs must improve their competence, prudence, and integrity to ensure their role as guardians of legal certainty is optimal.

#### 5. References

#### Journals:

Bahardudin. (2014). Kewenangan Pejabat Pembuat Akta Tanah (PPAT) Dalam Proses Jual Beli Tanah. *Keadilan Progresif*, Vol. 5, No. 1

## **Books:**

- Abdul Atsar. (2018). Hukum Perikatan Indonesia (Dalam Suatu Pendekatan Perbandingan Hukum). Depok: PT Rajagrafindo Persada
- Abdulkadir, Muhammad. (1994). *Hukum Harta Kekayaan*, Bandung: Citra Aditya Bakti
- Boedi Harsono. (1999). Hukum Agraria Indonesia: Sejarah Pembentukan UU Pokok Agraria. Jakarta: Djambatan
- Boedi Harsono. (2003). *Hukum Agraria Indonesia: Sejarah Pembentukan Undang-Undang Pokok Agraria, Isi dan Pelaksanaannya*. Jakarta: Djambatan
- I Ketut Oka Setiawan. (2021). Hukum Perikatan. Jakarta: Sinar Grafika
- J Andy Hartanto. (2014). Hukum Pertanahan: Karakteristik Jual Beli Tanah Yang Belum Terdaftar Hak Atas Tanahnya. Surabaya: Laksbang Justitia
- Jimly Asshiddiqie, M. Ali Safaat, et al. (2006). *Teori Hans Kelsen Tentang Hukum*. Jakarta: Sekretariat Jenderal Kepaniteraan Mahkamah Konstitusi RI

- Kholida, Putra Halomoan Hasibuan, Muhammad Reza Alamsyah, Ade Fitri Ramadani, Amil Keramat. (2024). *Notaris dan PPAT di Indonesia: Aplikasi Teori dan Praktik Dalam Pembuatan Akta.* Yogyakarta: Semesta Aksara
- Nita Triana. (2019). Alternative Dispute Resolution: Penyelesaian Sengketa Alternatif Dengan Model Mediasi, Arbitrase, Negosiasi dan Konsiliasi. Yogyakarta: Kaizen Sarana Edukasi
- Sudarto. (2007). Hukum dan Hukum Pidana, Cet. 5. Bandung: PT Alumni, hal. 45.
- Taufan Fajar Riyanto. (2023). *Panduan Lengkap Belajar Cerdas Hukum Ke-PPAT-an.* Semarang: Samudera Biru, hal. 212, 290.
- Widyo Pramono. (2012). Pertanggungjawaban Pidana Korporasi Hak Cipta.

  Bandung: PT Alumni