

Investigation of the Notary Providing False Testimony Under Oath in a Criminal Case

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ABSTRACT

The main task of a Notary is to make authentic deeds, of course this has consequences where the Notary who makes the authentic deed has responsibility for the authentic deed he makes in order to provide legal certainty to the public in order to provide legal protection. This research uses a doctrinal approach method. The first result of this research is, the notary's responsibility for the deed he has made, if it is proven to contain false information and the notary knows about it, the notary must be responsible both from an administrative, civil law and criminal law perspective for the deed he has made. If the notary does not know that the information is false information, then the notary concerned is not responsible for the false information contained in the deed he made. A third party who suffers loss as a result of an authentic deed that is suspected of containing false information made by the notary must prove that there are untruths in the contents of the authentic deed so that he or she can receive legal protection. If the third party does not have evidence that he suffered losses from an authentic deed which is suspected of containing false information made by a notary, then he does not receive legal protection. Because an authentic notarial deed has perfect evidentiary power as regulated in Article 1870 of the Civil Code. Second, Notaries receive preventive and repressive legal protection through the establishment and enforcement of laws. The Notary Honorary Council (MKN) plays a role in providing approval for the summons and retrieval of notary documents in the judicial process, as well as providing guidance to maintain the integrity of notaries.

Keywords	Notary Public; Responsibility; Legal protection
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PRELEMINARY

The 1945 Constitution of the Republic of Indonesia and Pancasila serve as the foundational pillars of the Unitary State of the Republic of Indonesia, ensuring legal certainty and protection for all Indonesian citizens. This legal certainty can be effectively implemented when it is enshrined in legislation. Once legislation is based on legal certainty, it will provide legal protection for every citizen in Indonesia, complemented by law enforcement mechanisms to realize such certainty and protection.

The Notarial Institution is one such body that upholds regulations to create legal certainty, thereby ensuring legal protection for the public. This institution arises from the need within human interactions for proof in legal relationships in the civil domain among parties engaging in such relationships.¹ As public officials representing and acting on behalf of the state, notaries provide services to the general public, appointed by the state and vested with authority to exercise a portion of the state's power in civil law.²

A notary, as a public official, has specific authority in private law since they are authorized to create authentic deeds. Juridically, authority refers to the capability granted by legislation to produce legal effects. Notarial deeds must be created in a format prescribed by law, which is one of their defining characteristics.³ For a notarial deed to possess perfect evidentiary strength, all procedural requirements must be met.⁴ The evidentiary power of a notarial deed is categorized into three types⁵:

1. External evidentiary power: The formal requirements necessary for a notarial deed to be considered an authentic deed.
2. Formal evidentiary power: The assurance that the events and facts stated in the deed were indeed carried out or declared by the notary or the appearing parties.
3. Material evidentiary power: The certainty that the contents of the deed constitute valid evidence against the parties who created the deed or those who have rights and are binding, unless proven otherwise.

In practice, disputes involving notarial deeds may arise, leading to the involvement of the notary in accusations of complicity or assistance in criminal acts, such as making or providing false statements in notarial deeds. This does not imply that notaries are immune from legal consequences; they can be criminally liable if it is proven in court that they deliberately or inadvertently collaborated with the parties to create a deed unlawfully, with the intent to benefit certain parties or harm others.

In the case referenced by Decision Number 83/PID/2016/PT.SMG, Notary PPAT Mrs. ER, S.H. C.N., in July 2014, ordered the insertion of false information into an authentic deed concerning a matter whose truth must be declared by the deed, intending to use or cause someone else to use it as if the information were true, resulting in potential harm.

To deliver professional services, a notary must be responsible for their own actions, embodying moral, intellectual, and professional integrity as part of their life. They must also be accountable to their peers by willingly offering their expertise in a manner beneficial to society, bearing the risks that come with their service. Negligence in their professional duties can have detrimental or harmful effects on themselves and others.⁶

Legal actions specified in a notarial deed are not the actions of the notary but constitute agreements or determinations made by the parties requesting or necessitating such actions, subsequently formalized into an authentic deed.⁷ According to Tan Thong Kie, a notary's task is to "constitute legal relations between the parties in written form and a

¹ G.H.S. Lumban Tobing. *Peraturan Jabatan Notaris*. Jakarta: Erlangga, 1999, hlm. 2.

² Herlien Boediono, "Pertanggungjawaban Notaris Berdasarkan Undang-Undang Nomor 30 Tahun 2004 (Dilema Notaris Diantara Negara, Masyarakat dan Pasar)", *Jurnal Renvoi Mediatama*, 2005.

³ Habib Adjie, *Sanksi Perdata dan Administratif Terhadap Notaris Sebagai Pejabat Publik*, Bandung : Refika Aditama, 2009, hlm. 31.

⁴ *Ibid.*

⁵ R Soegondo Notodisoerjo, *Hukum Notariat di Indonesia: Suatu Penjelasan*, Jakarta : CV Rajawali Pers, 1982, hlm. 8

⁶ Roesnastiti Prayitno, *Kode Etik Notaris*, (Jakarta: Universitas Indonesia, 2020), him. 38.

⁷ A. Kohar, *Notaris Dalam Praktik Hukum* (Bandung: Penerbit Alumni, 1983), hlm. 25

specific format, thus creating an authentic deed or strong document in legal proceedings."⁸ As both professionals and 'Public Officials,' notaries bear responsibilities to individuals, the profession, society, and the state, encompassing legal, moral, and ethical obligations. This concept is captured by the saying 'noblesse oblige,' meaning those of high rank or position must act honorably and responsibly.⁹ This implies that a notary must not only act honestly and with high morals but also gain public trust through their good conduct.

A notary's responsibility in the legal profession cannot be separated from the principle that their role should reflect the grandeur of the law itself, thereby delivering services that uphold the law's dignity.¹⁰ Based on the aforementioned context, the researcher formulates the following problem statements: 1. What is the responsibility of a notary suspected of creating an authentic deed containing false information? 2. What legal protection exists for notaries who exhibit negligence in the process of creating an authentic deed suspected of containing false information?

METHOD

The research method employed by the author in this journal is doctrinal research, which involves the study of legal principles or doctrines. As such, this research is inherently limited to positive law, including legislation, jurisprudence, and other related legal sources.¹¹ Data is obtained and collected in the form of primary legal materials and secondary legal materials. This data is processed and analyzed qualitatively, with the results presented descriptively by explaining, elucidating, and illustrating the issues and their resolutions in relation to the writing.

RESULT AND DISCUSSION

Responsibility of Notaries Suspected of Creating Authentic Deeds Containing False Information

The presence of notaries is always necessary for the community. Notaries are appointed by the authorities not only for their own interests but also for the benefit of the society they serve. Therefore, the law places great trust in notaries.¹² The role of a notary in creating authentic deeds is merely to record or document a legal act performed by the involved parties. A notary merely records what occurs, what is seen, and experienced from the involved parties, ensuring the formal requirements for the creation of an authentic deed are met before documenting it. Notaries are not required to investigate the material truth of the content of the authentic deed. This necessitates that notaries remain neutral and impartial and provide legal advice to clients seeking guidance from them.¹³

The authority of a notary in creating authentic deeds does not imply that the deed belongs to the notary. Instead, the notary records what is requested by the clients or involved

⁸ Tan Thong Kie, *Studi Notariat, Serba-serbi Praktik Notaris*, Buku I (Jakarta: PT Ichtiar Baru Van, 2007), hlm. 159.

⁹ Mardjono Reksodiputro, *Menyelaraskan Pembaruan Hukum*, (Jakarta: Komisi Hukum Nasional RI, 2009), hlm. 205.

¹⁰ Hartanti Sulihandari dan Nisya Rifiani, *Prinsip-Prinsip Dasar Profesi Notaris*, Jakarta: Dunia Cerdas, 2013, hlm. 6.

¹¹ Iman Jauhari, *Metode Penelitian Hukum*, (Medan: Program Pasca Sarjana Universitas Pembangunan Panca Budi, 2008), hlm. 12.

¹² Nico, *Tanggung Jawab Notaris Selaku Pejabat Umum*, Yogyakarta: Center For Documentation and Studies of Business Law (CDSBL), 2003, hlm. 84.

¹³ Kunni Afifah, "Tanggung Jawab Dan Perlindungan Hukum Bagi Notaris Secara Perdata Terhadap Akta Yang Dibuatnya", *Jurnal Lex Ranaissance*, No. 1 Vol. 2, Yogyakarta, 2017, hlm. 154.

parties. Therefore, the deed belongs to the clients or the parties involved. If a dispute arises from what is contained in the notary deed, those bound and involved are the ones who made the agreement documented in the deed, while the notary is not bound to fulfill any promises or obligations stated in the deed made before them. Notaries cannot simply be held accountable for the actions of the parties documented in the notary deed. However, it is possible that a notary, in carrying out their duties and authority, may make errors that are not justified under the Notary Office Law, such as being involved in creating a notary deed to benefit one party or themselves.

The Law on the Position of Notaries (UUJN) stipulates that if a notary is found to have committed a violation while performing their duties, they will be subject to civil and administrative sanctions. These sanctions are regulated by the UUJN and the Notary Code of Ethics. The UUJN does not regulate criminal sanctions. However, if a notary is found to have committed a criminal offense, they will be subject to criminal sanctions under the Criminal Code (KUHP)¹⁴, with the provision that the notary's punishment can be carried out under certain conditions, namely¹⁵:

1. There is a legal act by the notary regarding the physical, formal, and material aspects of the deed, intentionally and consciously planned, making the deed the basis for committing a criminal offense.
2. There is a legal act by the notary in making the deed that, when measured against the UUJN, does not comply with the UUJN.
3. The notary's actions are also not in accordance with the assessment of the competent authority, in this case, the Notary Supervisory Council.¹⁶

The criminal act of falsifying an authentic deed and providing false information in an authentic deed falls under the category of forgery, regulated in Book II, Chapter XII of the Criminal Code. Forgery of documents is considered to affect public trust in the contents of documents concerning the interests of individuals who may be directly harmed by the forgery.

The act of creating a false authentic deed or including false information constitutes a criminal offense (Articles 263, 264, and 266 of the Criminal Code). The creation of such deeds is generally intended to be used as a means to commit other criminal acts, such as fraud, embezzlement, land grabbing (stellionaat), and other crimes.¹⁷ The crime of forgery of documents is outlined in Article 263 of the Criminal Code.¹⁸ Article 264 of the Criminal Code specifically regulates the forgery of documents mentioned in Article 263, with the penalty for such forgery increased to a maximum imprisonment of eight years if it involves certain documents mentioned in Article 264(1).¹⁹

Article 266(1) of the Criminal Code states that ordering the inclusion of false information in an authentic deed constitutes document forgery. False information refers to information not in accordance with the truth, regarding an event that must be proven by the authentic deed.²⁰ A notary can be criminally prosecuted if it can be proven in court that the

¹⁴ Pasal 63 ayat (2) KUHP

¹⁵ Sjaifurrachman dan Habib Adjie, *Aspek Pertanggungjawaban Notaris dalam Pembuktian Akta*, (Bandung: Mandar Maju, 2011), hlm. 208.

¹⁶ Habib Adjie, *Sanksi Perdata dan Administratif terhadap Notaris sebagai Pejabat Publik*, (Bandung: Refika Aditama, 2008), hlm. 210.

¹⁷ Osman Simanjuntak, *Pelanggaran Profesi Notaris/PPAT*, (Jakarta: Sumber Ilmu Jaya, 1998), hlm. 4.

¹⁸ P.A.F.Lamintang, *Delik-Delik Kasus (Kejahatan-Kejahatan Membahayakan Terhadap Surat-Surat, Alat-Alat Membahayakan, Alat-Alat Bukti dan Peradilan)*, (Bandung: Mandar Maju, 1991), hlm. 1.

¹⁹ Iin Purwaningsih, *Pemalsuan Akta Autentik Yang Melibatkan Notaris*, *Jurnal Hukum dan Kenotariatan*, Vol 3 No 1, 2019, hlm. 9

²⁰ *ibid*

notary intentionally or in collusion with the involved parties created a deed with the intent to benefit one party while harming another. If proven, both the party that caused harm and the notary must be punished.²¹

The UUJN stipulates that when a notary is proven to have committed a violation in their duties, they must be held accountable and subjected to sanctions, which can be civil, administrative, criminal, or related to the Notary Code of Ethics. These sanctions are detailed in the UUJN and the Notary Code of Ethics. In practice, a legal act or violation by a notary may be subject to administrative or civil sanctions or ethical sanctions, but may later be reclassified as a criminal act committed by the notary.²²

A notary, as an official who creates authentic deeds, if their errors, whether intentional or due to negligence, cause harm to others, is considered to have committed an unlawful act. Compensation for such unlawful acts is regulated in Article 1365 of the Civil Code, which includes:

1. An unlawful act,
2. Fault or negligence,
3. Harm caused,
4. A causal relationship between the act and the harm.

In terms of administrative law, a notary's authority is based on the UUJN. If these provisions are not adhered to, the deed created by the notary can become a private deed and can be annulled or declared null and void. A notary's administrative responsibility can be requested through a notary organization, while criminal and civil accountability must be pursued through the courts. However, the court's ruling may be forwarded to the notary organization for further action.²³

Due to the violations committed by a notary, the notary must be held administratively accountable. According to the Notary Code of Ethics, administrative sanctions include: reprimands, warnings, temporary suspension from membership, honorable discharge from membership, and dishonorable discharge from membership. Besides administrative accountability, the Notary Supervisory Council should provide further guidance to notaries found violating the UUJN to prevent recurrence of such violations.²⁴

If an authentic deed contains information suspected to be false, the deed is invalid and has no binding legal force. The notary can be held administratively accountable under the UUJN, Articles 1320, 1338, and 1335 of the Civil Code, and potentially criminally liable under Articles 263, 264, 266, and 55 of the Criminal Code if there is an element of participation. This accountability also extends to third parties who feel harmed by the authentic deed. It is recommended that aggrieved parties report the notary, as judges only decide on matters based on what is requested and demanded by the complainant or petitioner.

Legal Protection for Notaries Who Commit Negligence in the Process of Creating Authentic Deeds Suspected of Containing False Information

Legal protection for notaries is a progressive effort by the state, through the government, to provide recognition and protection for the dignity and status of notaries,

²¹ Fabryan Nur Muhammad, Yeni Widowaty, Penerapan Sanksi Pidana Terhadap Pemalsuan Akta Otentik yang Dilakukan Oleh Notaris, Media of Law and Sharia, Vol 1 No.1, 2019, hlm 10,

²² Habib Adjie, Snksi Perdata dan Administrasi terhadap notaris sebagai pejabat public, (bandung: Refika Aditama, 2009), hlm. 120

²³ M. Luthfan Hadi Darus, Hukum Notariat dan Tanggungjawab Jabatan Notaris, hlm. 58.

²⁴ Ibid.

both as public officials and as individual citizens. This protection, both preventive and repressive, is carried out through the establishment and enforcement of legal regulations within the framework of the Pancasila legal state.²⁵

The role of notaries involves providing public service related to the creation of deeds and other tasks entrusted to them as public officials within the scope of their duties and authority.²⁶ Public service by notaries is an essential governmental function based on the principle of providing and ensuring legal certainty for members of society. Consequently, in specific fields, this duty is conferred and entrusted to notaries by law. The public must trust that the deeds issued by notaries provide legal certainty, and the authority granted to notaries forms the basis of their duties and functions.²⁷

To maintain this trust, there must be oversight to ensure that notaries' duties always align with the legal norms underlying their authority, preventing any misuse of the authority or trust placed in them. Oversight of notaries in their role as public officials also includes ensuring that legal protection is provided to notaries in the execution of their duties and functions as mandated by law. As ordinary human beings, notaries can naturally make mistakes, whether personal or professional in nature while performing their official duties. The Notary Law (UUJN) positions notaries as public officials practicing law, necessitating that legal protection be afforded to the notary profession as a whole, rather than to notaries as individuals.²⁸

In performing its role as a legal protection institution, the Notary Honor Council (MKN) holds the authority as outlined in Article 66, paragraph (1) of the Notary Law (UUJN), which stipulates that, for the interests of judicial processes, investigation, prosecution, or judicial examination, with the approval of the Notary Honor Council, the following actions can be undertaken:

- a) Taking photocopies of the Minuta Deed and/or documents attached to the Minuta Deed or Notary Protocol in the notary's custody; and
- b) Summoning the notary to appear for examination related to the Deed or Notary Protocol in the notary's custody.

Article 66, paragraph (1) of the UUJN provides a pathway to involve a notary in an investigation process, provided that investigators, prosecutors, or judges obtain approval from the Notary Honor Council. The MKN is an organizational body established to uphold the code of ethics, dignity, and honor of notaries, functioning independently and impartially in carrying out its duties and authority within the organization, as described in Article 1, number 8 of the Notary Code of Ethics. Over time, Article 66, paragraph (1) of the UUJN has sparked debate, as it is perceived to grant notaries a special status compared to other legal subjects who must comply with summonses in investigative processes without exception. Investigators, prosecutors, or judges must first obtain approval from the MKN to summon a notary.²⁹ The MKN then decides the necessity of the notary's presence in the investigation,

²⁵ Bachrudin, *Hukum Kenotariatan Perlindungan Hukum dan Jaminan Bagi Notaris Sebagai Pejabat Umum dan Warga Negara*, (Yogyakarta: Thema Publishing, 2021), hlm. 144.

²⁶ Paulus Efendi, *Perlindungan Hukum Bagi Notaris*, Makalah dalam Rangka Kongres Ikatan Notaris Indonesia, Bandung, Januari 2003

²⁷ Sjaifurrachman dan Habib Adjie, *Aspek Pertanggungjawaban Notaris dalam Pembuatan Akta*, hlm. 230.

²⁸ Ibid

²⁹ Anandiaz Raditya Priandhana, Surastini Fitriasih, Winanto Wiryomartani, *Perlindungan Hukum Terhadap Notaris dalam Proses Penyidikan (Studi Putusan Mahkamah Konstitusi Nomor 16/PUU-XVII/2020)*, Indonesian Notary, Volume 3 Nomor 1 (2021), hlm. 734.

considering the notary's obligation to maintain confidentiality protected by the notary's right of refusal.

The MKN's role is crucial in providing guidance and legal protection for notaries to prevent legal issues that could undermine the institution of notaries as a trusted entity for the public. To execute its duties in providing legal protection for notaries as stipulated in Article 66, paragraph (1) of the UUJN, the MKN has the authority to examine notaries suspected of violations related to alleged criminal acts in the creation of authentic deeds. If evidence of a violation by the notary causing harm to parties is found, the MKN can grant approval for the investigator to examine the notary in judicial processes. If not, the MKN cannot grant approval. The examination conducted by the MKN with the assistance of the Examination Council aims to assess the significance of the notary's involvement or the deeds they created in clarifying a case.

The UUJN positions notaries as public officials practicing law, necessitating that legal protection is provided to the notary profession rather than to notaries as individuals.³⁰ Legal protection for notaries in carrying out their duties and authority to ensure the function of service and the attainment of legal certainty in providing services to the public is regulated in Article 66 of the UUJN in conjunction with Article 23 of the Minister of Law and Human Rights Regulation No. 25 of 2020 concerning the Duties and Functions, Requirements and Procedures for Appointment and Dismissal, Organizational Structure, Working Procedures, and Budget of the Notary Honor Council.³¹

For judicial processes, investigators, prosecutors, or judges wishing to take photocopies of the Minuta Deed or documents attached to the Minuta Deed or Notary Protocol in the notary's custody, or to summon the notary for examination related to the deed or protocol in the notary's custody, must obtain approval from the Regional Notary Honor Council. If the summoning of the notary for judicial processes is approved, the notary under investigation can be accompanied by the Regional Notary Honor Council. This accompaniment by the Regional Notary Honor Council during the investigation is passive; the Council does not have speaking rights but acts to uphold the dignity and honor of the notary profession and oversee the investigation to ensure no violations of the notary's rights by investigators, prosecutors, or judges.³²

The examination of notaries in the investigative process, accompanied by the Regional Notary Honor Council, does not require written permission, allowing the Council to immediately accompany the notary to protect the dignity and honor of the notary office. If criminal elements are found during the investigation, the accompaniment shifts from the Regional Notary Honor Council to the domain of legal counsel.³³

Article 66, paragraph (1) of the UUJN applies to notaries in the context of their duties and authority per Article 15 of the UUJN. The presence of the Notary Honor Council aims to provide legal protection for notaries as public officials. The Council has the authority to examine notaries suspected of legal violations in the creation of authentic deeds. The Regional Notary Honor Council can approve or reject examination requests based on the Examination Council's findings. Approval or rejection is given considering whether a

³⁰ Sjaifurrachman dan Habib Adjie, *Aspek Pertanggungjawaban Notaris dalam Pembuatan Akta*, hlm. 230

³¹ Peraturan Menteri Hukum dan Hak Asasi Manusia Nomor 25 Tahun 2020 tentang Tugas dan Fungsi, Syarat dan Tata Cara Pengangkatan dan Pemberhentian, Struktur Organisasi, Tata Kerja, Dan Anggaran Majelis Kehormatan Notaris, Pasal 27

³² Ernita Febri Arfianti, *Perlindungan Hukum terhadap Notaris Yang Ditetapkan sebagai saksi dalam proses penyidikan dengan terbentuknya Majelis Kehormatan Notaris Wilayah*, Tesis Magister Kenotariatan Universitas Indonesia, 2017, hlm.84-85.

³³ Ibid.

criminal act is evident without the notary's testimony; if so, the request must be rejected. However, if the notary's testimony is needed to clarify the criminal act, the request must be approved.³⁴

Notary RA, SH, MKn acted without preparation and not based on applicable legal principles, particularly the principle of diligence in verifying evidence presented. In this case, Notary RA, SH, MKn failed to diligently verify the identity of the individual present, where the person accompanying Mrs. ER, SH, CN was not Mrs. HS, but Mrs. T, sent by Mrs. ER, SH, CN. This principle of diligence aligns with Article 16, paragraph (1), letter a, requiring notaries to act carefully in performing their duties. Due to this negligence, Notary RA, SH, MKn became involved in a criminal case involving Notary Mrs. ER, SH, CN and must follow judicial proceedings as a witness. Therefore, Notary RA, SH, MKn requires legal protection, and the Regional Notary Honor Council must grant approval since his testimony is needed to clarify the case.

CLOSING

A notary is responsible for performing their duties and may be subject to sanctions if found to have committed violations. These sanctions can be civil, administrative, or criminal in nature. The Notary Law (UUJN) and the Notary Code of Ethics regulate administrative and civil sanctions, while criminal sanctions are governed by the Criminal Code (KUHP). A notary can be criminally punished if proven to have intentionally or collaboratively with others created a deed containing false information. Notaries receive both preventive and repressive legal protection through the establishment and enforcement of laws. The Notary Honor Council plays a role in approving the summoning and seizure of notarial documents in judicial processes, as well as providing guidance to maintain the integrity of notaries.

BIBLIOGRAPHY

- G.H.S. Lumban Tobing. (1999). *Peraturan Jabatan Notaris*. Jakarta: Erlangga.
- Habib Adjie. (2009). *Sanksi Perdata dan Administratif Terhadap Notaris Sebagai Pejabat Publik*. Bandung: Refika Aditama.
- R Soegondo Notodisoerjo. (1982). *Hukum Notariat di Indonesia: Suatu Penjelasan*. Jakarta: CV Rajawali Pers.
- Roesnastiti Prayitno. (2020). *Kode Etik Notaris*. Jakarta: Universitas Indonesia.
- A. Kohar. (1983). *Notaris Dalam Praktik Hukum*. Bandung: Penerbit Alumni.
- Tan Thong Kie. (2007). *Studi Notariat, Serba-serbi Praktik Notaris*. Jakarta: PT Ichtiar Baru Van
- Mardjono Reksodiputro. (2009). *Menyelaraskan Pembaruan Hukum*. Jakarta: Komisi Hukum Nasional RI.
- Hartanti Sulihandari dan Nisya Rifiani. (2013). *Prinsip-Prinsip Dasar Profesi Notaris*. Jakarta: Dunia Cerdas.
- Iman Jauhari. (2008). *Metode Penelitian Hukum*. Medan: Program Pasca Sarjana Universitas Pembangunan Panca Budi.

³⁴ Moh. Sodiq, *Peranan Dan Wewenang Majelis Kehormatan Notaris Sebagai Pejabat Tata Usaha Negara, Supremasi Hukum*, Vol 7 No. 1, 2018, hlm. 94.

- Nico. (2003). *Tanggung Jawab Notaris Selaku Pejabat Umum*, Yogyakarta: Center For Documentation and Studies of Business Law (CDSBL).
- Sjaifurrahman dan Habib Adjie, (2011). *Aspek Pertanggungjawaban Notaris dalam Pembuktian Akta*, Bandung: Mandar Maju.
- Habib Adjie. (2008). *Sanksi Perdata dan Administratif terhadap Notaris sebagai Pejabat Publik*, Bandung: Refika Aditama.
- Bachrudin. (2021). *Hukum Kenotariatan Perlindungan Hukum dan Jaminan Bagi Notaris Sebagai Pejabat Umum dan Warga Negara*. Yogyakarta: Thema Publishing.
- Osman Simanjuntak. (1998). *Pelanggaran Profesi Notaris/PPAT*. Jakarta: Sumber Ilmu Jaya.
- P.A.F.Lamintang. (1991). *Delik-Delik Kasus (Kejahatan-Kejahatan Membahayakan Terhadap Surat-Surat, Alat-Alat Membahayakan, Alat-Alat Bukti dan Peradilan*. Bandung: Mandar Maju.
- Paulus Efendi (2003). *Perlindungan Hukum Bagi Notaris, Makalah dalam Rangka Kongres Ikatan Notaris Indonesia*. Bandung.

Artikel Jurnal

- Anandiaz Raditya Priandhana, Surastini Fitriasih, Winanto Wiryomartani. (2021). *Perlindungan Hukum Terhadap Notaris dalam Proses Penyidikan (Studi Putusan Mahkamah Konstitusi Nomor 16/PUU-XVII/2020)*, Indonesian Notary, 3 (1), 731-744.
- Herlien Boediono. (2005). *Pertanggungjawaban Notaris Berdasarkan Undang-Undang Nomor 30 Tahun 2004 (Dilema Notaris Diantara Negara, Masyarakat dan Pasar)*. Jurnal Renvoi Mediatama.
- Kunni Afifah. (2017). *Tanggung Jawab Dan Perlindungan Hukum Bagi Notaris Secara Perdata Terhadap Akta Yang Dibuatnya*. Jurnal Lex Ranaissance. 1(2), 142-154.
- Moh. Sodiq. (2018). *Peranan Dan Wewenang Majelis Kehormatan Notaris Sebagai Pejabat Tata Usaha Negara, Supremasi Hukum*. 7 (1), 89-99.
- Ernita Febri Arfianti. (2017). *Perlindungan Hukum terhadap Notaris Yang Ditetapkan sebagai saksi dalam proses penyidikan dengan terbentuknya Majelis Kehormatan Notaris Wilayah*, Tesis Magister Kenotariatan Universitas Indonesia, 84-85.

