



Recognizing The Notary's Right of Verschoningsrecht to Maintain Confidentiality of Office in Judicial Proceedings

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Abstract

find out and analyze the rules in the duties and positions of a Notary regarding the Notary's obligation to maintain the confidentiality of his position. In Article 16 Paragraph (1) letter F of the Notary Office Law Jo. Article 54 of the Notary Office Law states that a Notary has the right of denial. The right of refusal is the right not to speak related to the problem of the deed made by the Notary. The position held by a Notary is a position of trust, as someone who is entrusted, the Notary has rights and obligations, where the right of refusal/verschoningsrecht becomes the right to keep everything that is notified confidential, which is known to him as a Notary even though some are not included in the contents of the deed. The Law on the Position of Notary Number 2 of 2014 concerning amendments to Law Number 30 of 2004 concerning the Position of Notary gives a right of refusal to a Notary regarding the deeds he made. So the existence of the right of refusal raises juridical problems in the judicial process, where if the Notary is summoned as a witness in the trial, the Notary can use the right of refusal to keep the contents of the deed he made secret.

I. Introduction

The law develops following the times that are always evolving and the needs of the community for the Notary service profession are also increasingly needed in forming a rule of law, namely, the Law Number 30 of 2004 concerning the Office of Notary (hereinafter referred to as UUJN). UUJN is a umbrella act that provides hope to the public regarding legal protection for the public and Notaries in the implementation of their positions. Based on Article 1 point 1 of the UUJN, it states that a Notary is a public official authorized to make authentic deeds, regarding all duties and powers of a Notary determined by laws and regulations and / or desired by those concerned to be stated in an authentic deed. Nowadays, there are many cases that drag the name of Notary, both in criminal, civil and state administrative court cases. Based on the existing legal rules, namely Article 16 paragraph (1) letter e of the UUJN, a Notary can refuse a summons or refuse to provide information about something that is confidential and related to his/her

position or the word he/she makes.¹ In order to create a democratic life, fulfillment of human rights, and also the welfare of a just society, forming a rule of law is a necessary thing. According to Rober Leroy, law is a body of enforceable rules governing relationships among individuals and between individuals and their society.

As an official who stands in the realm of law, making a Notary directly or indirectly has a right that in addition to making authentic deeds, also to maintain the running of legal processes that occur, especially those closely related to civil and criminal justice processes. The judicial process referred to here is closely related to matters of proof, both proof by testimony and also proof by writing. In a criminal justice process, there will be an evidentiary stage that emphasizes evidence based on Article 184 of the Criminal Procedure Code, namely expert testimony, witness testimony, letters, instructions, and there is also the testimony of the defendant. Article 1866 of the Civil Code states that what can be used as evidence is written evidence, evidence by witnesses, confessions, suspicions, oaths, and everything while still paying attention to the rules set out in the Civil Code.²

The summoning of a person who works as a Notary in court as a witness is closely related to the existence of an office in the field of law that is considered to support the smooth running of a legal process, and the judicial process. Notaries are obliged to maintain the confidentiality of all contents and information obtained during their term of office. Notary with his oath of office which is emphasized in Article 4 Paragraph (2) of the UUJN that, and openly disclose and divulge the secrets of his office to anyone unless there are other laws and regulations that regulate or allow Notary to disclose the secrets of his office. According Paragraph (1) letter f, a Notary in carrying out his duties and positions has an obligation to maintain the confidentiality of the deeds he makes and also all information by him for the purpose of making deeds in accordance with the oath and/or pledge of office of a notary, the determines otherwise. Article 322 of the Criminal Code also stipulates that a person who intentionally discloses a secret that he is obliged to keep and safeguard because of his position shall be punished by a maximum imprisonment of 9 months and a maximum fine of Rp 9000.³

According to one legal expert, Van Bemmelen, there are three grounds that can be used to demand the use of the right to refuse, which are as follows: first, a close or very close family relationship; second, the danger of facing criminal sanctions; and third, regarding status, occupation/profession, and confidentiality of position. Article 1 of Article 2 of the Memorandum of Understanding between the Notary Association and the National Police of the Republic of Indonesia (No. Poli: B/1054V/2006 No: 01/MOU/PPINI/V/2006) states that investigators can take all legal actions, including summons, examinations, seizures, and other actions, in accordance with the law that

¹ Ni Luh Putu Sri Purnama Dewi, I Dewa Gde Atmadja, dan I Gede Yusa, "Hak Ingkar Notaris Sebagai Wujud Perlindungan Hukum," *Acta Comitas* 3, no. 1 (2018): 145, <https://doi.org/10.24843/ac.2018.v03.i01.p11>.

² Muhammad Ilham Arisaputra, "Kewajiban Notaris Dalam Menjaga Kerahasiaan Akta Dalam Kaitannya Dengan Hak Ingkar Notaris," *Perspektif* 17, no. 3 (2012): 173, <https://doi.org/10.30742/perspektif.v17i3.106>.

³ Ahmad Nasir, "Kerahasiaan Notaris Dalam Kaitannya Dengan Hak Ingkar Pasca Lahirnya Permenkumham Nomor 17 Tahun 2021" (Fakultas Hukum Universitas Muhammadiyah Sumatera Utara, 2021).

they are responsible for and as appropriate according to Article 7 Paragraph (1) letter j of the Criminal Procedure Code (KUHP). This can also be applied to Notary-PPAT officials who create land deeds (PPAT), whether they are designated as witnesses or suspects, especially in relation to a criminal act in the creation of Notary-PPAT deeds in accordance with the provisions of Article 66 of Law No. 2 of 2014 concerning Amendments to Law No. 30 of 2004 on the Position of Notaries. The 2nd Article of the Memorandum of Understanding between the Indonesian Notary Association and the Indonesian National Police (No. Pol: B/1054V/2006 x No: 01/MOU/PPINI/V/2006) explains that investigators may summon Notaries-PPAT after obtaining approval from the Supervisory Council, which has the authority and obligation to carry out guidance and supervision.

Looking at the explanation of Article i4 paragraph (2) and Article i16 paragraph (1) ihuruf1, it seems that it does not provide an explanation or there is an obscurity in its regulation regarding the obligation of the Notary's denial whether it must be done or not. The problems that will be discussed in the writing of this article are, first, regarding the Legal Certainty for a Notary in Exercising his Right to Keep the Contents of the Deed he made a secret and second is to examine the profession of Notary in Carrying out the Secrets of his Position in Relation to the Right of Recusal in the Judicial Process. After discussing and analyzing these two problems, it is hoped that a solution will be found in the content and conclusions of the writing of this journal article. The purpose of this research is to analyze and understand the legal framework, roles, and responsibilities of notaries as regulated in Law Number 30 of 2004 concerning the Office of Notary in Indonesia. This law serves as the legal foundation governing the authority, obligations, code of ethics, and professional conduct that must be adhered to by notaries in carrying out their duties as public officials. Through this research, it is expected to gain a comprehensive understanding of the implementation of the notarial office in accordance with the applicable regulations.

State of art As a comparison for writing this research, I refer to two previous studies. The first study is entitled "The Right to Denial as Legal Protection for Notaries Dealing with Special Criminal Actions", and the second study is entitled "Notary Position After the Constitutional Court Decision No. 49/PUU-X/2012: Certainty and Legal Protection of Notary Rights (Verschoningsrecht) in Carrying Out Duties Based on Law Number 30 of 2004."⁴ The first study examines the right and obligation of notaries to refuse disclosure, as regulated by Article 1909 (3) of the Civil Code and Articles 4 (2) and 16 (1) letter e of the UUJN, which are intended to provide legal protection; however, in practice, notaries often do not receive such protection when involved as witnesses in court cases related to deeds they have created.⁵ The second study examines how, despite the Constitutional Court Decision No. 49/PUU-X/2012 granting notaries the right to refuse to provide information during investigations or court proceedings, legal certainty and protection

⁴ Gerald Elisa Munthe, Faculty Law, dan Jl T D Pardede, "Notary Position After the Constitutional Court Decision No . 49 / PUU- X / 2012: Certainty and Legal Protection of Notary Rights (Verschoningsrecht) in Carrying Out Duties Based on Law Number 30 of 2004," 2024, 783–90.

⁵ Munthe, Law, dan Pardede.

remain incomplete, with current enforcement being repressive and insufficient to fully safeguard notaries' rights.⁶

2. Research Methods

The writing of this scientific journal article uses a normative legal research method in which this problem is discussed regarding how to recognize the right to deny the notary *verschoningsrecht* to maintain the confidentiality of the office in this judicial process there is an obscurity of norms in it. Normative legal research is a study whose focus of study is on legal materials or legal literature with the ultimate goal of achieving coherent truth.⁷ The approach used in writing this journal is a conceptual analysis approach (Analytical Conceptual Approach) and a statutory approach (Statute Approach).⁸ The sources of legal materials used as guidelines in this writing are primary, secondary, and tertiary legal materials.⁹ The technique of collecting legal materials used in writing this journal is carried out by reviewing legal materials and literature studies, namely collecting, examining, and searching for reading sources related to the problem of how to recognize the right of notary *verschoningsrecht* to maintain the confidentiality of office in the judicial process. After being studied in depth, the legal material is then analyzed using legal material analysis techniques with qualitative descriptive analysis methods in order to obtain a result that can answer these problems.¹⁰

3. Results and Discussion

3.1. Legal Certainty for Notaries in Exercising Their Right to Keep Deed Contents Secret

The history of the notary profession can be traced back to the 2-3rd century AD during the reign of Ancient Rome, the notary at that time was a person in charge of recording speeches, and the name of the notary itself was taken from the name of his servant, Notarius. Later this name became a term or title for a group of fast writers or stenographers.¹¹ The regulation of the office of notary began to be regulated in Indonesia during the Dutch colonial rule as stated in the *Reglement op Het Notarisin Nederlands Indie* (stbl.1860: 3), and in the latest post-independence period the regulation was further refined through Law Number 2 of 2014 concerning Amendments to. Law Number 30 of

⁶ Raihandi Azka dan Riza Nizarli, "The Right to Denial as Legal Protection for Notaries Dealing with Special Criminal Actions" 3, no. 4 (2023): 464-70.

⁷ Ahmad Rosidi, M Zainuddin, dan Ismi Arifiana, "Metode Dalam Penelitian Hukum Normatif Dan Sosiologis (Field Research)," *Journal Law and Government* 2, no. 1 (2024): 46-58.

⁸ Peter Mahmud Marzuki, *Penelitian Hukum Edisi Revisi* (Jakarta: PrenadaMedia Group, 2019).

⁹ David tan, "Metode penelitian Hukum: Mengupas Dan Mengulas Metodologi Dalam Menyelenggarakan penelitian Hukum," *NUSANTARA: Jurnal Ilmu Pengetahuan Sosial* 8, no. 5 (2021): 1332-36, <https://core.ac.uk/download/pdf/490668614.pdf>.

¹⁰ Marzuki, *Penelitian Hukum Edisi Revisi*.

¹¹ Sudikno Mertokusumo dan A. Pitlo, *Bab-Bab Tentang Penemuan Hukum* (Jakarta: Citra Aditya Bakti, 2007).

2004 concerning Position. Notary which was passed on January 17, 2014 by the House of Representatives of the Republic of Indonesia (DPR-RI).¹² The public certainly needs someone whose testimony can be trusted and relied upon in making a deed, whose signature and seal (stamp) provide assurance and strong evidence as an impartial expert and advisor who has no defects. (onkreukbaar or unimpeachable).

The existence of notary institutions or notary organizations emerged as one of the state's efforts to create legal certainty and protection for members of the community.¹³ Sudikno Mertokusumo provides an opinion on the definition of a notary, namely as a public official. who has the authority to make an authentic deed regarding all actions, agreements, and stipulations ordered by general regulations or requested by the parties making the deed. In order to be declared an authentic deed, a deed made according to Article 1868 of the Civil Code (KUH Perdata) states that the so-called authentic deed is "a deed in the form prescribed by law, made by or before public servants authorized to do so in the place where the deed is made". In line with the contents of Article 1868 of the Civil Code, according to Habib Adjie's opinion, the understanding of the contents of Article 1868 of the Civil Code is to provide limitations on what is meant by an authentic deed, namely, including that first the deed must be made by (door) or in the presence of (tenoverstaan) a Public Official, secondly the deed must be in the form prescribed by law, and thirdly the Public employee (Public Official) by-or before whom the deed is made, must have the authority to make the deed.

The members of the Indonesian Notary profession in Indonesia until now still use unchanged legal provisions in terms of making deeds, especially regarding actions. facing, reading, signing and use. stamp. In this era of borderless times, all barriers that limit the movement of information and communication can be accessed with certain intentions and purposes. A Notary must also be prepared to provide services in accordance with the advancement of information and communication technology. For this reason, a notary concept must first be created in carrying out his position along with the advancement of information and communication technology in a global context.¹⁴

Looking at the above understanding, it can be seen that the only public official with the authority to make authentic deeds is the Notary, as long as it is not determined that other officials can make authentic deeds. This makes the Notary must be aware of the importance of the responsibility of the Notary profession. The duties and authority of a Notary are closely related to a. decree, deeds, and agreements which can trigger rights and obligations between various. parties which then provide evidence or guarantees for decrees, agreements, and actions so that all parties participating in the deed have. legal certainty.¹⁵ Furthermore, Notary in carrying out his profession. not limited to existence

¹² Laurensius Arliman Simbolon, *Notaris dan Penegakan Hukum Oleh Hakim* (Sleman: Deepublish, 2015).

¹³ Hendy Sarmyendra, "Kekuatan Berlakunya Penggunaan Blanko Akta Tanah oleh Notaris/Pejabat Pembuat Akta Tanah dalam Pengalihan Hak atas Tanah di Kabupaten Malinau Kalimantan Utara.," *Jurnal Beraja Niti* 4, no. 3 (2014).

¹⁴ Habib Adjie, *Kebatalan dan Pembatalan Akta Notaris* (Bandung: Refika Aditama, 2011).a

¹⁵ W Handoko, *Dominasi Negara Terhadap Profesi Notaris Antara Ide dan Realitas* (Bogor: Roda Publikasi Kreasi, 2019).

alone but in order to meet the needs of the general public who need services, from a Notary.

The Notary profession does have a circular obligation mentioned in the UUJN, but this does not make. Notaries become immune to the law, because Notaries still have responsibility for the deeds they make. Notaries must be accountable for their actions. both in criminal law and civil law if there is evidence that leads to the Notary giving false information and. making mistakes, as well as assisting one of the parties in. making authentic deeds.¹⁶ Until now, most people still need or request the services of a Notary for the benefit of the client or because the law requires the use of notary services.

3.2. Notary in Implementing the Secret of Office in Relation to the Right of Recusal in Judicial Proceedings

Revealing or disclosing secrets obtained during their term of office to anyone, except as permitted by other laws and regulations that allow for such disclosure, cannot be done by a Notary freely and at will without exception in the court proceedings. The oath during the term of office is emphasized as one of the obligations of a Notary as stated in Article 16 paragraph (1) letter f, which requires the Notary to maintain the confidentiality of everything regarding the deeds they create and all information obtained during their term of office for the purpose of creating the deeds in accordance with their oath of office, unless otherwise stipulated by law. That obligation becomes a duty that is inherent to the responsibilities during the term of office. Notaries are regarded as officials who can provide reliable advice, and everything that is written and established by them is considered true, as they are the creators of documents that are legally recognized. The relationship between the notary and the client is established during the process of creating an authentic deed in accordance with their authority.¹⁷

Notaries can still keep secrets during their term of office even though the obligation to deny ends by utilizing the right to deny (*verschoningsrecht*) granted to them based on the provisions of Article 1909 paragraph (2) point 3e of the Civil Code. Civil Code, which reads "Any person who by virtue of his position, occupation or position is obliged by law to keep something secret, but only concerning matters of which knowledge is entrusted to him as such." Then Article 170 paragraph (1) of the Criminal Procedure Code, states that "Those who by virtue of their occupation, dignity or position are obliged to keep a secret, may request to be exempted from the obligation to give testimony as a witness, namely on matters entrusted to them."

The notary's right of denial. is an obligation that must be carried out by the notary because his position is an office. trust (*vertrouwens ambt*) and therefore someone is willing. entrust something to him as a trust (*vertrouwens person*). So that the notary is obliged to keep secret everything that is told to him as a notary.¹⁸ Notary as an office of

¹⁶ E. Kusumaningdiah, "Ketidaksinkronan Peraturan Perundang-Undangan Mengenai Kewajiban Ingkar Notaris," *sebelas maret*, 2017.

¹⁷ Aman, "Perlindungan Hukum Notaris," *Recital Review* 1, no. 02 (2019): 59-71, <https://online-journal.unja.ac.id/RR/article/download/7452/9688>.

¹⁸ Agung Sudarmono, "Prinsip Persamaan Kedudukan Di Hadapan Hukum Terhadap Hak Ingkar Notaris Untuk Merahasiakan Akta," *Magister Kenotariatan Fakultas Hukum Universitas Negeri Jember (Universitas Negeri Jember, 2018)*,

trust is obliged to keep the secrets of his/her office, especially as emphasized in. Article 4 paragraph (2) and Article 16 paragraph (1) letter f of the UUJN, clarity should be given on the limits of the Notary's circular obligations which are closely related to the Notary's circular rights that can be used as a solution when called as a witness in a criminal justice process. Authentic deeds made by and/or before a Notary are valid as evidence that can be used in both civil and criminal trials, except that the evidentiary value is not the same. In the Criminal Procedure Law which adheres to a negative system of proof according to the law (negative wettelijk) and the existence of a minimum limit of proof (minimum bewijs) results in evidence in the form of an authentic deed alone cannot be used as a basis for judges to decide a case. There is a principle that punishment. can be imposed must fulfill two conditions, namely. valid evidence (wettige bewijsmiddelen) and the confidence of the judge or what is called overtuiging des rechts.¹⁹

In relation to the summoning procedure. Notary as a witness, especially in the criminal justice process, must be approved by the Notary Honor Council. This aims to provide legal protection for Notaries when carrying out their duties. The protection provided earlier aims to maintain the equilibrium of the Notary in maintaining the confidentiality of the deed with the interests of law enforcement in carrying out their duties as emphasized in the provisions of Article 66 of the Notary Law. The Notary Honor Council before giving permission to the Notary to be examined as a witness both in the investigation and trial stages will first summon. Notary to conduct a hearing through the Regional Supervisory Council to request information in connection with the request for a summoning letter. Notary either from the investigator or the court. The decision of the hearing can approve or reject the summoning of the Notary.²⁰

The approval of the Regional Supervisory Council. in granting permission to summon Notary either as a witness or suspect if the reasons as stated in. Article 15 of the Regulation of the Minister of Law and Human Rights Number: M.03.HT.03.10 of 2007 concerning Taking. There are allegations of criminal acts related to deeds and / or letters attached to the Deed Minute or Notary Protocol in the Notary's storage, the right to prosecute has not been waived. based on the provisions regarding expiration in the legislation in the criminal field. In addition to the aforementioned reasons considered by the Regional Supervisory Council in submitting its approval, there are other things that are considered if the Notarial deeds that become evidence or facts are very relevant to the criminal event that is strongly suspected to have occurred.²¹ Notary being. an office of trust, must keep the contents of the deed confidential as well as all information obtained. for the purpose of making the deed. This obligation is an instrument derived from the obligation of the Notary inherent in the duties of his office. Nevertheless, Notary can still keep secret. the contents of the deed as well as the information obtained for the making of the deed. by using the right of denial / right of resignation as a witness

[https://repository.unej.ac.id/bitstream/handle/123456789/90142/Agung Sudarmono%2C S.H.Sdh.pdf?sequence=1&isAllowed=y](https://repository.unej.ac.id/bitstream/handle/123456789/90142/Agung_Sudarmono%2CS.H.Sdh.pdf?sequence=1&isAllowed=y).

¹⁹ Djoko Prakoso, *Alat Bukti dan Kekuatan Pembuktian di dalam Proses Pidana* (Yogyakarta: Liberty, 1988).

²⁰ Aman, "Perlindungan Hukum Notaris."

²¹ Pieter E. Latumeten, "Seputar Masalah Hukum Penerapan Pasal 66 UU Jabatan Notaris," *Renvoi* 3 (2005).

given to him, specifically in criminal justice. in the provisions of Article 170 paragraph (1) and paragraph (2) of the Criminal Procedure Code.

Referring to the wording of Article 16 paragraph (1) letter f, it is only emphasized that what must be kept secret is "everything. about the deed he makes and all information obtained for. the making of the deed in accordance with the oath of promise/office", whereas the clarity of the meaning of the wording of this article is a crucial benchmark to determine the extent of the Notary's right of denial that can be used in the trial. It is not a problem to know the limitations of the Notary's obligation to keep secret if it relates to everything about the deed he makes as stated in Article 16. paragraph (1) letter f, because the structured division of this sentence can be further reviewed in the provisions of Article 54 of the UUJN. This provision expressly prohibits. Notary to deliver grosse, copy or show or disclose the contents of his deeds other than to persons directly interested in the deed, their heirs and assigns, except in matters regulated in general regulations.

Judges cannot only be satisfied with the formal truth shown, testing of the formal evidence before the court, as well as factual information found in the trial as a consideration to strengthen the judge's confidence in deciding the case. As a result, the authentic deed submitted as evidence at trial must be accompanied by other evidence and generally in the form of witness testimony. Even if the above conditions occur, notaries are given legal protection by law in the context of delivering testimony at trial. The form of this legal protection is the Notary's right of denial which can be used so that an obligation to maintain the secret of his office is maintained.

4. Conclusion

The notary profession began in Ancient Rome and evolved into a legal role recognized in Indonesia since Dutch colonial times. In modern Indonesia, notaries are regulated under Law No. 2 of 2014 and are authorized to create authentic legal deeds. These deeds must follow legal formats and be made by or before an authorized official. Notaries play a vital role in ensuring legal certainty and are trusted by the public. They must adapt to technological changes but remain legally accountable for any misconduct or false statements in the deeds they make. In order to be declared as an authentic deed, an authentic deed in Article 1868 of the Civil Code (Civil Code). This is intended because, an authentic deed has outward, formal, and material evidentiary power. Notaries are required by law to keep confidential all information and deeds created during their duties, as stated in Article 16(1)(f) of the Notary Law. They have the right to refuse to testify about confidential matters (*verschoningsrecht*), and can only be summoned in court with approval from the Notary Honor Council. Although notarial deeds are valid legal evidence, they must be supported by additional proof in criminal cases. This confidentiality obligation is a core part of the notary's trusted role and is protected by law.

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Bibliography

- Aman, Aman. "Perlindungan Hukum Notaris Dalam Melaksanakan Rahasia Jabatan: Notaris, Rahasia Jabatan." *Recital Review* 1, no. 2 (2019): 59-71.
- Arisaputra, Muhammad Ilham. "Kewajiban Notaris Dalam Menjaga Kerahasiaan Akta Dalam Kaitannya dengan Hak Ingkar Notaris." *Perspektif* 17, no. 3 (2012): 173-183. <https://doi.org/10.30742/perspektif.v17i3.106>.
- Azka, Raihandi, dan Riza Nizarli. "The Right to Denial as Legal Protection for Notaries Dealing with Special Criminal Actions" 3, no. 4 (2023): 464-470.
- Dewi, Ni Luh Putu Sri Purnama, I. Dewa Gde Atmadja, and I. Gede Yus. "Hak Ingkar Notaris Sebagai Wujud Perlindungan Hukum." *Jurnal Ilmiah Prodi Magister Kenotariatan* 3, no. 1 (2018): 145-156. <https://doi.org/10.24843/ac.2018.v03.i01.p11>.
- Handoko, W. *Dominasi Negara Terhadap Profesi Notaris Antara Ide dan Realitas*. Bogor: Roda Publikasi Kreasi, 2019.
- Kusumaningdiah, E. "Ketidaksinkronan Peraturan Perundang-Undangan Mengenai Kewajiban Ingkar Notaris." *sebelas maret*, 2017.
- Latumeten, Pieter E. "Seputar Masalah Hukum Penerapan Pasal 66 UU Jabatan Notaris." *Renvoi* 3 (2005).
- Mertokusumo, Sudikno, dan A. Pitlo. *Bab-Bab Tentang Penemuan Hukum*. Jakarta: Citra Aditya Bakti, 2007.
- Munthe, Gerald Elisa. "Notary Position After the Constitutional Court Decision No. 49/PUU-X/2012: Certainty and Legal Protection of Notary Rights (*Verschoningsrecht*) in Carrying Out Duties Based on Law Number 30 of 2004." *JIM: Jurnal Ilmiah Mahasiswa Pendidikan Sejarah* 9, no. 3 (2024): 783-790.
- Nasir, Ahmad. "Kerahasiaan Notaris Dalam Kaitannya Dengan Hak Ingkar Pasca Lahirnya Permenkumham Nomor 17 Tahun 2021." *Fakultas Hukum Universitas Muhammadiyah Sumatera Utara*, 2021.
- Rosidi, Ahmad, M Zainuddin, dan Ismi Arifiana. "Metode Dalam Penelitian Hukum Normatif Dan Sosiologis (Field Research)." *Journal Law and Government* 2, no. 1 (2024): 46-58.
- Sarmyendra, Hendy. "Kekuatan Berlakunya Penggunaan Blanko Akta Tanah Oleh Notaris/Pejabat Pembuat Akta Tanah Dalam Pengalihan Hak Atas Tanah Di Kabupaten Malinau Kalimantan Utara." *Jurnal Beraja Niti* 4, no. 3 (2014).
- Sudarmono, Agung. "Prinsip Persamaan Kedudukan Di Hadapan Hukum Terhadap Hak Ingkar Notaris Untuk Merahasiakan Akta." *Magister Kenotariatan Fakultas Hukum Universitas Negeri Jember*. Universitas Negeri Jember, 2018.
- Tan, David. "Metode penelitian hukum: Mengupas dan mengulas metodologi dalam menyelenggarakan penelitian hukum." *Nusantara: Jurnal Ilmu Pengetahuan Sosial* 8, no. 8 (2021): 2463-2478.

Laws and Regulations

Civil Code

Criminal Procedure Code

Law of the Republic of Indonesia Number 2 of 2014 concerning Amendments to Law
Number 30 of 2004 concerning the Position of Notary Public.

Notary Code of Ethics 2015

Minister of Law and Human Rights Regulation Number: M.03.HT.03.10 of 2007
concerning the Collection of Minutes and Summoning of Notaries

Reglement op Het Notaris in Nederlands Indie (stbl. 1860 : 3).