

# NORMATIVE JURIDICAL ANALYSIS OF FORGERY OF LETTERS IN AN AUTHENTIC DEED COMMITTED BY NOTARIES

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## ABSTRACT

*This study examines the legal framework for notaries who commit acts of forgery of letters in an authentic deed based on the decision of the Denpasar District Court Number 147/Pid.B/2022/PN Dps. As public officials with the authority to create authentic deeds, notaries are expected to serve the public interest by providing a service that avoids forgery and ensures the authenticity and legal status of the deeds they create. This study centers its objective at examining the legal basis provided to Notaries who have committed acts of forgery of authentic deeds they have prepared. The research method employed is the normative legal research method with a normative juridical approach. The results of the description and analysis of this research indicate that the criminal act committed by the defendant, for forgery of letters in an authentic deed has fulfilled the elements of the criminal act of forgery of letters in an authentic deed committed by a Notary in accordance with Article 264 of the Criminal Code and Article 55, paragraph (1). In view of the above, it is appropriate to impose the legal sanctions that have been applied to the defendant in respect of violations of the code of ethics contained in the Notary Position Law. This includes the imposition of a prison sentence of three years. It is also appropriate to impose the repressive steps or sanctions used in imposing punishment on the defendant.*

**Keywords:** Notary, Forgery, Authentic Deed

## ABSTRAK

Penelitian ini mengkaji tentang kerangka hukum bagi Notaris yang melakukan tindakan pemalsuan surat dalam akta otentik berdasarkan putusan Pengadilan Negeri Denpasar Nomor 147/Pid.B/2022/PN Dps. Sebagai pejabat publik yang berwenang membuat akta autentik, Notaris diharapkan dapat melayani kepentingan masyarakat dengan memberikan pelayanan yang terhindar dari pemalsuan serta menjamin keaslian dan status hukum akta yang dibuatnya. Penelitian ini memusatkan tujuannya untuk mengkaji landasan hukum yang diberikan kepada Notaris yang melakukan perbuatan pemalsuan akta otentik yang dibuatnya. Metode penelitian yang digunakan adalah metode penelitian hukum normatif dengan pendekatan yuridis normatif. Hasil uraian dan analisis penelitian ini menunjukkan bahwa tindak pidana yang dilakukan oleh terdakwa atas pemalsuan surat dalam akta otentik telah memenuhi unsur-unsur tindak pidana pemalsuan surat dalam akta otentik yang dilakukan oleh Notaris. sesuai dengan Pasal 264 dan Pasal 55 ayat (1) KUHP. Mengingat hal tersebut di atas, sudah sepatutnya menjatuhkan sanksi hukum yang telah diterapkan kepada terdakwa sehubungan dengan pelanggaran kode etik yang tertuang dalam Undang-Undang Jabatan Notaris. Termasuk penjatuhan hukuman penjara tiga tahun. Juga tepat untuk menerapkan langkah-langkah represif atau sanksi yang digunakan dalam menjatuhkan hukuman kepada terdakwa.

**Kata Kunci :** Notaris, Pemalsuan, Akta Autentik

## 1. Introduction

### 1.1 Background

A notary is a public official with the authority to authenticate legal deeds. According to the definition of a notary in Law Number 2/2014 amending Law Number 30 of 2004 concerning the position of the notary, "A notary is an official authorized to create legally binding documents, and they have additional authorities as outlined in this law or as established by other laws". The role of notary as a public official is to fulfill the duties of the state by serving the public at their request, with the resulting authentic deed becoming a state document. It is, therefore, expected of the notary to serve and assist the community in the process of making authentic deeds, which represents the role of the notary in representing the state as a subject in achieving public welfare.

The role of notary is of great importance in meeting the needs of the community, particularly in the context of authentic deeds. In addition to addressing the needs of the community, the creation of authentic deeds can provide legal certainty in the form of written evidence, thereby enabling the community to uphold and obtain legal protection. Notarial deeds are referred to as authentic deeds since the reading of the deed explains that the identity of the parties must be listed, the contents of the agreement agreed upon by the parties, signed by the parties, and so on. If the conditions for the making of an authentic deed are not met, the deed can be null and void.<sup>1</sup>

The final stage of the process of making a deed is reading the deed by the notary, with the objective of ensuring that the parties are fully aware of the contents of the deed, which represents the agreement of the parties. The role and responsibility of the notary is to protect, provide justice and a sense of security for the parties who agree on the agreement.<sup>2</sup> The role of notary, as defined by the state, is of great importance. As a public official, the notary is subject to prosecution and liability for the deeds he or she performs. The foundation that serves as a legal umbrella for Notaries is the Notary Position Law and the professional code of ethics, namely the The Code of Notary.

Every action taken by a notary is the result of a free will that cannot be found out or understood by others. Therefore, the free will carried out by the Notary can be in the form of beneficial actions or, conversely, detrimental ones. This free will may have a direct impact on the parties who bind themselves to the agreement made in the authentic deed. In practice, free will often causes problems and tends to become the basis for legal cases in the Notary office. One of the most common issues encountered in the practice of the Notary office is the forgery of authentic deeds. This can take the form of actions carried out by the parties involved, the circumstances surrounding the deed, or the documents that support the authenticity of the deed. Documents used in the creation of authentic deeds include party identity letters, genealogy letters, minutes of meetings, deeds of statement of meeting decisions, and so on.<sup>3</sup>

The subject of forgery of letters is addressed in Article 263 of the Criminal Code. This article outlines two categories of forgery of letters, each with distinct criminal

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<sup>1</sup> Aini, N., & Simanjuntak, Y. N., 2020, *Tanggung Jawab Notaris Atas Keterangan Palsu Yang Disampaikan Penghadap Dalam Akta Pendirian Perseroan*, Jurnal Komunikasi Hukum, Vol. 5, No. 2, DOI: <https://doi.org/10.23887/jkh.v5i2.18418>

<sup>2</sup> Cahyanti, N., Raharjo, B., & Wahyuningsih, S. E., 2018, *Sanksi Terhadap Notaris Yang Melakukan Tindak Pidana Menurut Peraturan PerundangUndangan Di Indonesia*, Jurnal Akta, 5(1), DOI: <http://dx.doi.org/10.30659/akta.v5i1.2617>

<sup>3</sup> Dharmawan, A., Nugroho, D. A., & Ramadhan, A. A., 2022, *Pertanggungjawaban Notaris Atas Minuta Akta Yang Dibuat Berdasarkan Keterangan Palsu Para Penghadap*. Jurnal Education And Development, 10(3), DOI: <https://doi.org/10.37081/ed.v10i3.3811>

penalties. The first category pertains to the forgery of letters with lighter criminal penalties, while the second category pertains to the forgery of letters with more severe criminal penalties. The latter category encompasses the forgery of letters that support the existence of an authentic deed, as outlined in Article 264, paragraph (1). Although the Criminal Code clearly outlines the legal consequences associated with forging letters, there are still numerous instances of misconduct and violations committed by notaries in the execution of authentic deeds, resulting in financial losses and injustices for those who are victimized by the forgery of letters.<sup>4</sup>

The aforementioned problems of forgery are classified into four categories. The first category encompasses instances where one of the parties causes harm to the other party and the Notary. The second category encompasses instances where the parties cause harm to the Notary. The third category encompasses instances where one of the parties and the Notary cause harm to the other party. Finally, the fourth category encompasses instances where the Notary causes harm to the parties. Of the four classifications, the fourth point, which is the offense committed by the Notary causing harm to the parties, is exemplified by the Denpasar District Court Decision Number 147/Pid.B/2022/PN Dps.

The Denpasar District Court, in Decision Number 147/Pid.B/2022/PN Dps, conducted a criminal trial on behalf of I Wayan Darma Winata, S.H., a notary who was legally proven to have committed, ordered, or participated in the forgery of letters against authentic deeds. The forgery of letters by Notary I Wayan Darma Winata, S.H. in the form of a Circular Decree of PT Jayakarta Balindo and Minutes of an Extraordinary General Meeting of Shareholders of PT Jayakarta Balindo was proven by the verdict to be a criminal offense and a violation of the code of ethics as a Notary. The defendant was found to have committed, ordered, or participated in the forgery of letters against authentic deeds relating to PT Jayakarta Balindo.

The issue thus arises as to the normative juridical analysis of notaries who commit the crime of forgery of letters in an authentic deed, as evidenced by the Denpasar District Court Decision Number 147/Pid.B/2022/PN Dps.

## **1.2 Research Problems**

This paper will examine the following problems:

1. How the elements of the crime of forgery of a letter in an authentic deed as set forth in Decision Number 147/Pid.B/2022/PN Dps are formulated?
2. What are the legal consequences of the crime of forgery of documents in an authentic deed as outlined in Decision Number 147/Pid.B/2022/PN Dps?

## **1.3 Purpose of Writing**

1. to identify the formulation of the elements of the crime of forgery of a letter in an authentic deed as stated in Decision Number 147/Pid.B/2022/PN Dps?
2. to analyze the legal consequences of the crime of forgery of letters in an authentic deed as outlined in Decision Number 147/Pid.B/2022/PN Dps?

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<sup>4</sup>Jalal, A., Suwitno, S., & Wahyuningsih, S. E., 2018, *Keterlibatan Pejabat Notaris Terhadap Perbuatan Melawan Hukum Dan Turut Serta Melakukan Tindak Kejahatan Dalam Pemalsuan Dokumen*. Jurnal Akta, 5(1), DOI: <http://dx.doi.org/10.30659/akta.v5i1.2551>

## 2. METHOD

This research employs a normative juridical legal research method that utilizes library materials and laws and regulations as a framework for inquiry. The research draws upon literature and laws and regulations as a basis for its analysis. The regulations employed are the Criminal Code (KUHP), the Civil Code (KUHPer), and the Notary Office Law (UUJN). The conceptual and statute approaches employed facilitate the analysis of problems through the lens of concepts or laws and regulations.<sup>5</sup>

## 3. RESULT AND DISCUSSION

### 3.1 Formulation of the Elements of the Crime of Forgery of Letters in an Authentic Deed as Set Forth in Decision Number 147/Pid.B/2022/PN Dps.

The defendant has been convicted of falsifying a document in accordance with Article 264, Paragraph (1) of the Criminal Code, which states that the accused has committed, or ordered to be committed, or participated in the falsification of a document. This act is defined in Article 55, Paragraphs (1) and (1) of the Criminal Code, which also outlines the terms of the conviction as follows:<sup>6</sup>

1. Person(s) who committed the act;
2. Forging or falsifying a letter in the form of an authentic deed whose truth must be declared by the deed;
3. Forging or falsifying a document which may give rise to a right, an agreement (obligation) or a release of debt, the truth of which must be declared in the form of an authentic deed;
4. Intention to use or causing others to use such documents as if they were genuine and unfalsified;
5. The use may cause loss;
6. Those who commit, those who order to commit, and those who participate in the act.

The term "Person(s) who committed the act" is defined in accordance with the conditions that must be met for accountability. These conditions include being a legal subject with a physical and mental health that enables accountability, and having an identity that aligns with the identity stated in the indictment. In this instance, the results of the trial demonstrate that the accused and witnesses confirmed statements made in the indictment, thus negating any potential for misinterpretation. Similarly, with regard to the defendant's physical and mental health, he has provided satisfactory and accurate responses.<sup>7</sup>

The term "Forging or falsifying a letter in the form of an authentic deed whose truth must be declared by the deed" pertains to a person or perpetrator who fabricates or orders the fabrication of a letter in opposition to an authentic deed, wherein the content does not align with the actual occurrence. It is important to reiterate that the truth must be declared by the deed. This means that the authentic deed becomes

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<sup>5</sup> Ibrahim, Johnny, 2011, *Teori & Metodologi Penelitian Hukum Normatif*, Edisi Revisi, Cet. Keempat, Bayumedia Publishing, Malang.

<sup>6</sup> Muhammad, Fabryan Nur, d.k.k., 2019, *Penerapan Sanksi Pidana Terhadap Pemalsuan Akta Autentik Yang Dilakukan Oleh Notaris*, Jurnal Media of Law and Sharia, Vol. 1 No. 1. DOI:10.18196/mls.1101

<sup>7</sup> Zulfan, M., 2021, *Perlindungan Hukum Bagi Calon Notaris Yang Magang Di Kantor Notaris Yang Tidak Direkomendasikan Oleh Pengurus Wilayah Ikatan Notaris Indonesia*, Jurnal Officium Notarium, 1(3), DOI: <https://doi.org/10.20885/JON.vol1.iss3.art14>

strong evidence, as it can clarify the truth of the legal events that occur.

The authority of public officials to issue authentic deeds is regulated by Article 1868 of the Civil Code. This article outlines the public official in question, namely the Notary, who has the authority to issue authentic deeds as stated in Article 1, point 7 of Law Number 30 of 2004 concerning the Office of Notary. Based on the aforementioned decision, the defendant was duly appointed as a Notary Public in accordance with the Decree of the Minister of Justice of the Republic of Indonesia, Number C-161.HT.03.01-Th.1996, dated May 6, 1996. This appointment confers upon the Notary the duty to authenticate deeds, including deeds of sale and purchase, deeds of minutes of meetings, and other similar instruments.<sup>8</sup>

WD and NLW signed Deed of Statement Number 6 on April 20, 2019. This document was submitted to the Denpasar District Court to request PT. JAYAKARTA BALINDO to hold a General Meeting of Shareholders (GMS). The document included the following two requests: (1). Amendments to the Articles of Association to appoint NLW as President Commissioner; (2) The transfer of rights to the 99% NLW shares must be recorded in the register of shareholders or special register; and (3) The changes in the composition of shareholders and management must be notified to the Minister of Law and Human Rights so that they are recorded in the register of companies. The application was granted by the Denpasar District Court with the issuance of Stipulation Number 615/Pdt.B/2019/PN.Dps. The preceding description demonstrates that the requisite term "Making or falsifying a letter in the form of an authentic deed whose truth must be declared by the deed" has been fulfilled.

The term "Forging or falsifying a document which may give rise to a right, an agreement (obligation) or a release of debt, the truth of which must be declared in the form of an authentic deed" is discerned in the facts at trial through the testimony of witnesses, experts, and defendants who have a relationship with the evidence. Evidence such as the Death Certificate of the late ESS, Marriage Certificate, and Family Registry Certificate is not valid until the defendant, IWDW and NLW make a genealogical and inheritance statement with the intention of transferring the shares of the late ESS to NLW. The transfer of shares to NLW with invalid supporting documents results in NLW obtaining assets. Furthermore, the defendant and NLW did not comply with the legal requirements, particularly in that the defendant is also a public official notary who is aware of and knowledgeable about the process of authenticating deeds. However, the defendant did not fulfill the obligations set forth in the law.

The term "Intention to use or causing others to use such documents as if they were genuine and unfalsified" is exemplified in the issuance of invalid documents such as marriage contracts, identification cards, and minutes of shareholder meetings. These documents were created without a general meeting of shareholders actually having taken place. Moreover, there is a circular decision of PT JAYAKARTA BALINDO indicating that a meeting was held between NLW and the late PAS, a minority shareholder who sought to replace the commissioner GS with the witness, IWS. However, there was no such meeting, and the commissioner never received a letter regarding this matter. Consequently, the previous description, which has elucidated that the Denpasar District Court has determined the decision on the change of management of PT JAYAKARTA BALINDO with letters supporting the deed of change of

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<sup>8</sup> Oktasurya, G. B., & Suradi, H. W., 2016, *Pembatalan Akta Notaris Dalam Perjanjian Sewa-Menyewa Tanah Oleh Pengadilan Berdasarkan Putusan Mahkamah Agung Republik Indonesia Nomor: 15/K/Pdt/2009*, *Diponegoro Law Journal*, 5(2), DOI: <https://doi.org/10.14710/dlj.2016.11057>

management as if it were genuine, fulfills this fourth term.

The term "The use may cause loss" includes the process and the act of the defendant and the witness that forged or falsified the letters and resulted in the loss of several assets, including six plots of land measuring 850 m<sup>2</sup>, 2,450 m<sup>2</sup>, 150 m<sup>2</sup>, and 2,120 m<sup>2</sup>. The total loss is approximately 150 billion rupiahs, which represents a 99% share ownership of company assets and cash, as well as three plots of land measuring 2,268 m<sup>2</sup>, 243 m<sup>2</sup>, and 99% share ownership. In light of the aforementioned circumstances, it can be reasonably concluded that the provisions that could potentially result in a net loss have been met with the loss.

The term "Those who commit, those who order to commit, and those who participate in the act" are linked to Article 55, paragraph (1) to 1 of the Criminal Code, which defines the perpetrator as the one who does (*plegen*), the one who orders to do (*doen plegen*), or the one who participates in doing (*medeplegen*). It is evident that the defendant and NLW collaborated to forge or falsify letters in the process of drafting the Deed of Change of Management of PT JAYAKARTA BALINDO, with the assistance of several witnesses. However, the individual primarily responsible for devising the forged letters was the defendant, while NLW was responsible for drafting the Circular Decree and Deed of Minutes of the GMS of the company. The concept was developed in accordance with the direction previously provided by the defendant. This indicates that both parties recognize that criminal acts cannot be committed by an individual and fulfill this sixth terms.<sup>9</sup>

### 3.2 Legal Consequences of the Crime of Forgery of Letters in an Authentic Deed as Set Forth in Decision Number 147/Pid.B/2022/PN Dps

In its decision numbered 147/Pid.B/2022/PN Dps, the court found the defendant to be legally and convincingly culpable in the forgery of an authentic deed and in participating in the forgery process. The defendant's legal counsel presented a defense that differed from the reasoning of the Panel of Judges. The Panel's consideration was made by following the terms defined in Article 264, paragraph (1), and Article 55, paragraph (1), to 1, of the Criminal Code.<sup>10</sup>

The loss incurred by multiple parties due to the forgery of letters in this authentic deed includes the estimated loss of approximately IDR 150,000,000,000 (one hundred and fifty billion rupiah) to the extended family of the late ESS. Furthermore, the defendant is a public official notary who is held in high esteem by the community. However, his authority has been misused for purposes that are not in accordance with the regulations and that do not serve the interests of society in general. Consequently, the panel has sentenced the defendant to three-year imprisonment and handed over evidence related to the crime of forgery of letters in this authentic deed.

Based on Law Number 30/2004 concerning the Position of Notary, the application of administrative sanctions for Notaries who violate the code of ethics of their authority is regulated. From the perspective of the application of administrative sanctions, the Notary Position Law is seen to regulate the implementation of both

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<sup>9</sup> Wibowo, A. M. P., 2021, *Notaris Yang Terlibat Dalam Pembuatan Akta Perjanjian Pengikatan Jual Beli Yang Dipalsukan*, Al Qodiri: Jurnal Pendidikan, Sosial Dan Keagamaan, 19(2), DOI: <https://doi.org/10.53515/al%20qodiri.v19i2.4391>

<sup>10</sup> Risa, Hermawati, 2020, *Pemalsuan Akta Autentik Yang Dilakukan Oleh Notaris: Studi Kasus Putusan Nomor 1003 K /PID/2015*, Jurnal Hukum Kenotariatan, Vol. 2 No. 2. DOI: <https://doi.org/10.35814/otentik.v2i2.2112>

preventive and repressive measures.<sup>11</sup>

- a. The implementation of preventive or supervisory measures is evidenced by the examination of the Notary protocol, which is conducted at least once a year by three teams of examiners appointed by the Notary Council. This will undoubtedly result in continuity and the supervisory step represents the initial stage in the prevention of violations of the notary code of ethics.
- b. Repressive measures or the application of sanctions may be in the form of sanctions imposed by:
  - 1) Regional Supervisory Council of Notaries, which may issue an oral warning and/or written warning;
  - 2) The Regional Supervisory Council of Notaries has the authority to propose to the Central Supervisory Council of Notaries that the notary be temporarily dismissed for a period of three months to six months, or that the notary be dismissed in an honorable manner. In the event that the Central Supervisory Council of Notaries determines that the notary's conduct warrants immediate dismissal, it may temporarily dismiss the notary and propose to the Minister of Law and Human Rights that the notary be dismissed in an honorable manner; and
  - 3) The Minister shall dismiss the Notary in an unfavorable manner. Upon examination of the description, this punitive measure is implemented subsequent to a Notary's violation of the code of ethics, in contrast to the preceding preventive step, which is carried out through supervision or the objective is to prevent violations of the Notary code of ethics.<sup>12</sup>

The defendant undoubtedly implemented repressive measures by imposing sanctions based on the results of the analysis of the forgery of letters in the authentic deed. The provision of sanctions against the defendant is the provision of criminal sanctions, where criminal sanctions become the *ultimum remedium*, or the last resort, when sanctions or other legal efforts do not work to resolve the issue. The criminal sanctions imposed on the defendant are directed at the perpetrator (the individual) who committed the criminal act. This contrasts with administrative sanctions or civil sanctions, which are directed at the actions carried out by the perpetrator.<sup>13</sup>

#### 4. CONCLUSION

In light of the analysis and description above, along with the aforementioned issues, the criminal act committed by defendant, IWDW, for forgery of letters in an authentic deed has fulfilled the terms of a criminal act for forgery. The forgery of letters in an authentic deed was committed by a Notary in accordance with Article 264 of the Criminal Code, Article 55 paragraph (1). In order to ascertain the legal consequences imposed on the defendant with regard to violations of the code of ethics contained in the

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<sup>11</sup> Saly, Jeane, d.k.k., 2023, *Pertanggungjawaban Notaris Terhadap Pelanggaran Kode Etik Terkait Pemalsuan Akta Autentik*, Jurnal Ilmiah Wahana Pendidikan, Vol. 9 No. 20. DOI: <https://doi.org/10.5281/zenodo.8416138>

<sup>12</sup> Suwantara, Putu dan Sukma, Putu Angga Pratama Sukma, 2021, *Konsep Cyber Notary Dalam Menjamin Keautentikan Terhadap Transaksi Elektronik*, Jurnal Hukum Kenotariatan Acta Comitatus, DOI: 10.24843/AC.2021.v06.i01.p15

<sup>13</sup> Syaripudin, Pahmi, 2021, *Tindak Pidana Pemalsuan Dokumen dan Persyaratan Administrasi Perkawinan Dikaji Menurut Pasal 263 dan Pasal 264 Kitab Undang-Undang Hukum Pidana*, Journal Justiciabellen, Vol. 01 No. 01, DOI: <https://doi.org/10.35194/jj.v1i1.1116>

Notary Office Law, it is necessary to impose a three-year imprisonment. Furthermore, it is necessary to examine the steps used in the imposition of punishment against the defendant by taking repressive steps or the application of sanctions.

## Reference

### Book

Ibrahim, Johnny, *Teori & Metodologi Penelitian Hukum Normatif*, Edisi Revisi, Cet. Keempat, Malang: Bayumedia Publisng, 2011.

### Journal

Aini, N., & Simanjuntak, Y. N., *Tanggung Jawab Notaris Atas Keterangan Palsu Yang Disampaikan Penghadap Dalam Akta Pendirian Perseroan*, Jurnal Komunikasi Hukum 5, No. 2 (2020). <https://doi.org/10.23887/jkh.v5i2.18418>

Cahyanti, N., Raharjo, B., & Wahyuningsih, S. E., *Sanksi Terhadap Notaris Yang Melakukan Tindak Pidana Menurut Peraturan Perundang-Undangan Di Indonesia*, Jurnal Akta 5 No. 1 (2018). <http://dx.doi.org/10.30659/akta.v5i1.2617>

Dharmawan, A., Nugroho, D. A., & Ramadhan, A. A., *Pertanggungjawaban Notaris Atas Minuta Akta Yang Dibuat Berdasarkan Keterangan Palsu Para Penghadap*. Jurnal Education And Development, 10 No. 3 (2022). <https://doi.org/10.37081/ed.v10i3.3811>

Jalal, A., Suwitno, S., & Wahyuningsih, S. E., *Keterlibatan Pejabat Notaris Terhadap Perbuatan Melawan Hukum Dan Turut Serta Melakukan Tindak Kejahatan Dalam Pemalsuan Dokumen*. Jurnal Akta 5 No. 1 (2018). <http://dx.doi.org/10.30659/akta.v5i1.2551>

Muhammad, Fabryan Nur, d.k.k., *Penerapan Sanksi Pidana Terhadap Pemalsuan Akta Autentik Yang Dilakukan Oleh Notaris*, Jurnal Media of Law and Sharia 1 No. 1 (2019). <https://doi.org/10.18196/mls.1101>

Zulfan, M., *Perlindungan Hukum Bagi Calon Notaris Yang Magang Di Kantor Notaris Yang Tidak Direkomendasikan Oleh Pengurus Wilayah Ikatan Notaris Indonesia*, Jurnal Officium Notarium 1 No. 3 (2021). <https://doi.org/10.20885/JON.vol1.iss3.art14>

Oktasurya, G. B., & Suradi, H. W., *Pembatalan Akta Notaris Dalam Perjanjian Sewa-Menyewa Tanah Oleh Pengadilan Berdasarkan Putusan Mahkamah Agung Republik Indonesia Nomor: 15/K/Pdt/2009*, Diponegoro Law Journal 5 No. 2 (2016). <https://doi.org/10.14710/dlj.2016.11057>

Wibowo, A. M. P., *Notaris Yang Terlibat Dalam Pembuatan Akta Perjanjian Pengikatan Jual Beli Yang Dipalsukan*, Al Qodiri: Jurnal Pendidikan, Sosial Dan Keagamaan 19 No. 2 (2021). <https://doi.org/10.53515/al%20qodiri.v19i2.4391>

Risa, Hermawati, *Pemalsuan Akta Autentik Yang Dilakukan Oleh Notaris: Studi Kasus Putusan Nomor 1003 K /PID/2015*, Jurnal Hukum Kenotariatan 2 No. 2 (2020). <https://doi.org/10.35814/otentik.v2i2.2112>

Saly, Jeane, d.k.k., *Pertanggungjawaban Notaris Terhadap Pelanggaran Kode Etik Terkait Pemalsuan Akta Autentik*, Jurnal Ilmiah Wahana Pendidikan 9 No. 20 (2023). <https://doi.org/10.5281/zenodo.8416138>

Suwantara, I. Putu, and Putu Angga Pratama Sukma. "Konsep Cyber Notary Dalam Menjamin Keautentikan Terhadap Transaksi Elektronik." *Acta Comitatus: Jurnal Hukum Kenotariatan* 6, no. 01 (2021): 173-184. <https://doi.org/10.24843/AC.2021.v06.i01.p15>



Syaripudin, Pahmi, *Tindak Pidana Pemalsuan Dokumen dan Persyaratan Administrasi Perkawinan Dikaji Menurut Pasal 263 dan Pasal 264 Kitab Undang-Undang Hukum Pidana*, Journal *Justiciabellen* 01 No. 01 (2021).  
<https://doi.org/10.35194/jj.v1i1.1116>

**Legislation**

Kitab Undang- Undang Hukum Perdata (Staatsblaad Nomor 23 Tahun 1847 Tentang *Burgerlijk Wetboek*) (*Staatsblad* No. 23 Tahun 1847);

Undang-Undang Republik Indonesia Nomor 30 Tahun 2004 tentang Jabatan Notaris (LN No. 177 -TLN No. 4432);

Undang-Undang Republik Indonesia Nomor 2 Tahun 2014 tentang Perubahan atas Undang-Undang Nomor 30 Tahun 2004 tentang Jabatan Notaris (LN No. 3-TLN No. 5491);

Decision Of The Denpasar District Court Number:147/Pid.B/2022/PN.Dps