

Legal Protection Against Parties Who Are at a Loss for Deeds That Are Not Read Out and Explained to the Face

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Abstract

Notary has an important role in government programs related to accelerating the implementation of business activities in the National Economic Resilience. The important role is inseparable from the duties and functions as an authorized official in making authentic deeds regarding all acts, agreements and stipulations required by laws and regulations. In this study using normative research methods. Legal protection for parties who suffer losses due to deeds that are not read and not explained the purpose can be pursued through civil lawsuits, criminal reporting if elements of intent or fraud are found., as well as administrative complaints, to the Supervisory Council and the Ministry of Law and human rights so that the rights of the injured party remain guaranteed certainty and recovery in accordance with the provisions of legislation. Notaries who do not carry out the obligations as stipulated in the Notary Public Act, especially related to the obligations of notaries who do not carry out the obligation to read and explain the intent and purpose of the contents of the deed to the facing party may be held legally liable because such negligence results in the deed losing its authenticity. The research method used a normative juridical approach with a review of literature, legislation, and court decisions. This study also aims to provide understanding for the public so that they are more careful in using notary services and increase their awareness when signing deeds. The novelty of this research lies in its emphasis on the importance of court decisions as a means of upholding the principles of legal certainty and justice, while also reinforcing the need for strengthened supervision through the Notary Supervisory Council. The results of this research are expected to serve as a practical reference for notaries to improve their integrity, professionalism, and independence in order to create maximum legal protection for interested parties.

Keywords: *Legal Protection, Loss Due To Deed, Notary.*

INTRODUCTION

Notary is a state official who carries out a law fulfilment profession to the community, which in carrying out its duties needs to obtain protection and guarantees in order to achieve legal certainty. (S. Y. Yusuf, dkk, 2024) As public officials, notaries can provide legal certainty, legal order, and legal protection. Notaries implement this through authentic written evidence of the legal circumstances and events that occur before them. (D. Eriyanti dan F. H. Ridwan, 2022) Notary has an important role in government programs related to accelerating the implementation of business activities in the National Economic Resilience. The important role is inseparable from the duties and functions as an authorized official in making authentic documents relating to all actions, agreements, and provisions required by law and regulations. (S. Syamsir & Y. Yetniwati, 2019)

Act of Notary (hereinafter referred as UUJN) authorizes the notary to pour all authentic agreements and stipulations required by the parties facing him to ask the notary for his statement to be poured into an authentic deed so that it has perfect proof power. (D. E. Kurniati & E. Danil, 2025) Based on the explanation of Section 15 UUJN above, Notary has authority to make an authentic deed relating to all acts, agreements and provisions required by law. The role of notaries in society is very important, considering that they are responsible for guaranteeing the validity of legal documents and providing legal certainty for the community. (K. Kholidah, et.all, 2024) In this context, the notary not only serves as a witness, but also as a party that guarantees that all transactions are carried out legally and in accordance with the provisions of applicable law. (James Yoseph Palenewen) The legal context governing the notary profession in Indonesia is regulated in

the Notary Public Law (UUJN) which has undergone several changes. UUJN aims to provide a clear legal basis for notaries in carrying out their duties and responsibilities. (H. Dhoni Martien, 2023)

Influence that can be caused to the role of notary can it can also have a negative impact. The positive impact is supports the creation of certainty, order, and legal protection for society, while the negative impact will reduce credibility society against notaries who do not comply with the profession such as careless, negligent or dishonest, thereby reducing the credibility of the Notary. But the law on notary negligence is often misinterpreted in the case of laws that occur in Indonesia. The word negligence itself is always used as the basis of Notary errors and land deed officials (PPAT) violation of legal acts, whereas negligence itself is an accident in which not all acts against the law of the notary can be categorized as negligence.

Legislation regarding notaries and PPAT only explain the legal sanctions notary and PPAT of civil penalties and sanctions administration, where the second sanction in terms of the law does not explain about the difference between negligence and intentional causing each error of notaries are categorized as acts of negligence. If the notary and PPAT proven to commit legal acts that violate the law, then Notary / PPAT is not only responsible in accordance with civil law and administration only, but criminal law can also be used also depends on types of Notary/PPAT violations committed.

However, despite the existing regulatory regulations, there are still many notaries who have difficulty in applying the basic principles, including the impartiality that should be the main guideline in their practice. (A. A. Dwitriani dan B. Santoso, 2023) The influence that can be caused to the role of notaries can have a positive impact and can also have a negative impact. (F. Salim, 2020) The positive impact is to support the creation of certainty, order, and legal protection for the community, while the negative impact will reduce the credibility of the public against notaries who do not comply with the profession such as careless, negligent or dishonest, thereby reducing the credibility of the notary. (Cipto Soenaryo, 2023)

Deed made by a notary as evidence, must have elements of perfection, both in terms of material and formal. Thus, the notary must be responsible for the deed he has made. If the deed is made unlike the provisions that have been stipulated in the law, then the deed is juridically flawed and results in the deed losing its authenticity and invalidating the deed. The defect of an authentic deed can cause the notary to be sued and can be subject to compensation sanctions that have been experienced by the parties. (Stevani Komara, 2021)

Defective deeds can lead to disputes, resulting in the parties filing lawsuits and notaries being subject to sanctions for causing losses. As a written document created as a manifestation of a specific legal event, a deed must always be signed by the parties. A letter signed by the parties and its contents is a legal event that forms the basis for the parties to create rights and obligations and as evidence for the parties is a deed according to Sudikno Mertokusumo (2002). Thus, the creation of a deed by a notary has evidentiary power in the event of a dispute in the future. (C. Primadasa, 2022)

When drafting a deed, a notary is required to include everything in it in accordance with what has been agreed upon by the parties, and it is mandatory for the notary to read the contents of the deed to the parties. (B. M. Paskadwi, 2022), this is in line with the UUJN Section 15 Verse (1) which reads: “To create authentic deeds regarding all acts, agreements, and legal events required by law. Or regarding matters requested by the parties to be included in the deed, guaranteeing the certainty of the date, performing the deed protocol, providing the original deed, copies, and excerpts of the deed. All of these matters during the preparation of the deed that are not assigned or excluded by law are the authority of the Notary.” (Bernadete Nurmawati, 2023)

Notary is also authorized to make land-related deeds as long as not specially regulated by the competent authorities. Notary obligations that often occur irregularities in implementation is as stated and described in Section 16 Verse 1 M UUJN where the notary in carrying out his office is

obliged to read The Deed in front of the audience in the presence of at least one witness a number of 2 (two) witnesses, or (four) witnesses who are specifically for the manufacture of wills under hand, and signed at that time by faces, witnesses, and Notaries. (Amirahni Zahra Tripipo, 2025)

Notary has an obligation to include in the deed of what is actually understood in line with the desired parties and read it to the parties on the contents of the act, it is in line that set forth in UUJN Section 15 Verse (1) which reads: “To create authentic deeds regarding all acts, agreements, and legal events required by law. Or regarding matters requested by the parties to be included in the deed, guaranteeing the certainty of the date, performing the deed protocol, providing the original deed, copies, and excerpts of the deed. All of these matters during the preparation of the deed that are not assigned or excluded by law are the authority of the Notary”.

Notary shall act honestly, trustfully, thoroughly, impartially in perform their duties as the General Office of authentic deed-making. The impartiality of the notary is visible from the clause of rights and obligations contained in the act of authentic made that does not give advantage to one side to the detriment of the other. when in the making of an authentic act notary sided with one of the faces of the deed authentic notary can be degraded into a deed under hand, and the deed authentic notary it can be sued for cancellation to the court by the injured party. sanctions against a notary in favor of one of the parties in making the deed authentic is a civil sanction that the notary can be sued instead loss by the injured party and may be subject to administrative sanctions in the form of written reprimand, temporary dismissal (*suspension*), dismissal with respect, or dismissal with disrespect (dismissal).

In addition to criminal and administrative sanctions, notaries can also be reported to the police in the event of a successful transaction, one of which is detrimental to the interests of other interested parties by making false statements in the form of false statements under Article 266 of the Criminal Code, where the punishment is 7 (seven) years imprisonment. Notaries, as public officials appointed and dismissed by the state through the Minister of Law and Human Rights, are required to carry out all obligations stipulated by Law Number 2 of 2014 concerning the Notary Department in performing their professional duties, including making authentic deeds for the benefit of the parties. The implementation of all notary obligations can be carried out if the notary has an attitude of trust, honesty, independence, impartiality, and safeguards the interests of the parties involved in legal actions as stipulated in Article 16 Paragraph 1 Letter a of Law Number 2 of 2014 concerning Notaries.

A deed drawn up before a notary, containing information provided by the parties to the notary, is an authentic deed. Notaries have an obligation to be honest, trustworthy, thorough, and neutral in exercising their authority as officials. The notary's impartiality can be seen from the clauses made in the deed; these clauses must not benefit only one party. If the clauses are considered detrimental to one party, the authentic deed can be downgraded to a private deed and may cause disputes in the future. (Rika Sofiana, et.all, 2020)

The notary has no legal interest in making the authentic deed, and should not have emotional closeness to one of the faces, resulting in the interests, rights and legal obligations of the face that are neglected and exceed the interests, rights and legal obligations of other faces. If the authentic deed made by a notary contains elements of Notarial alignment with one of the faces, then the notary has violated the legal provisions contained in the UUJN and contained in the notary's code of ethics which requires notaries to be professional in making authentic deeds, especially deed partij (deed of the parties) which concerns the interests, rights and legal obligations.

In the decision of the Supreme Court of the Republic of Indonesia No. 154 K / Pdt/2016, where notary ZAINUDDIN THOHIR S. H., M. Kn. became the defendant II, which is located at Jalan Letjen Suprpto number 77 Senen Galur, Central Jakarta. Have asked the plaintiff in this matter to sign a sell Alliance Buy Number 42 made by Notary ZAINUDDIN THOHIR S. H., M.Kn without being read and explained the purpose and purpose of the binding deed of sale by the defendant to the plaintiff. That at the insistence of Defendant I and in convinced by the defendant

II for deed of sale and purchase Binding number 42 is in signed by the plaintiff with the appeal of Defendant I convinced by Defendant II that the deed of binding sale and purchase terseebut just an agreement course to get a loan of money, and because the plaintiff believes in Defendant II as a notary will not abuse the deed of sale and purchase Binding terseebut, so the plaintiff signed without regard to the contents binding the sale and purchase Number 42 dated May 20, 2011 made by Notary ZAINUDDIN THOHIR S. H., M.Kn. with this Notary in law to pay a case of Rp.500.000.00 (five hundred thousand rupiah).

Journal written by Rahmad Hendra (Jalan Hang Jebat GG Kadiran No. 5 Pekanbaru) entitled notary responsibility for the authentic deed the victim who uses a false identity in the city of Pekanbaru. In discussion that examines the liability of notaries deed containing false information. The notary is responsible for what witnessed, that is seen, heard and also done by a notary as a general officer in the exercise of his office. Therefore notary need to apply the principle of prudence in running his obligation.

Journal written by Khishtin Thonia Zamrud (2022) entitled notary responsibility against forgery sale and its legal consequences. In a discussion that examines related to how the responsibility of notaries who have committed acts Criminal in making authentic deed, whether the criminal act become degraded. Notary who committed the crime of falsification of letters in making authentic deed can be held criminally liable if proven guilty and meet the elements of criminal acts and meet the elements of error.

Based on Section 1 letter b notary Code of ethics Indonesian Notary Association (This), the Code of ethics of notaries and henceforth shall be called the Code of ethics is all moral rules dictated by the Association of Indonesian Notary Association which shall henceforth be called the " society " by decision of Congress Association and / or as determined by and regulated in the laws and regulations governing it and in force and shall be obeyed by any and all members. Society and all those who carry out their duties position as a notary, including temporary official notary, Substitute notary and special substitute notary.

Based on the description of the notary code of ethics above, it can be said that the notary code of ethics is a guideline for behaving, acting, and doing things in accordance with the code of ethics established by the Indonesian Notary Association (INI) and will be subject to sanctions by the organization if violated. Thus, it is important to conduct further research regarding impartiality in notary practice. Therefore, the author interested to conduct research by raising the topic of deed that is void for the sake of law because notaries are not independent and have been negligent with the deed made it. This study aims to identify the challenges faced notary and analyze how UUJN can play a role in supporting application of such impartial attitude.

RESEARCH METHODS

To facilitate answering the research questions, the researcher used a legal research method with a qualitative approach using literature as data. Normative research answers the research questions by comparing them with legal principles and doctrines, with the hope that the questions can be answered accurately and that a theory can be developed that can be used as a guideline for the issues under study. In this study, researchers will use a statutory approach, which involves examining all laws and regulations related to the legal issues being studied. This study is also expected to provide answers that are in accordance with the laws and legal doctrines relevant to the legal issues being studied, thereby ensuring the accuracy of this study. (Peter M. Marzuki, 2023)

The nature of this study is descriptive analytic, the intention is from this study is expected to obtain a detailed and systematic picture of problems to be investigated. (Rajali Capah dan Rahul Ardian Fikri, 2023).

RESULT AND DISCUSSION

The person who is harmed as a result of making a defective authentic deed by law is entitled to obtain a form of legal protection against the person who is harmed . The person who is harmed due to the deed that is not read out and explained the purpose and purpose of its contents by the notary becomes legally defective, the deed does not meet the legal requirements for a deed to be authentic . and down into the deed under hand and can be a null and void deed, because the person does not receive the results of a deed made by a notary.

Legal protection from civil lawsuits based on tort or tort (*onrechtmatigedaad*) by a notary (Section 1365 of the Civil Code), as evidenced by a deed that has been made by a notary and makes a loss to the face of the notary must be given sanctions in the form of paying compensation in accordance with the decision of the judge . Report to the notary Supervisory Board based on the provisions of the Notary Office Act related to violations of the code of ethics or violations of the law by notaries, because in this case the notary concerned has been proven to violate the code of ethics to perform actions contrary to the provisions of Section 15 of the UUJN to make an invalid deed and falsify the name of the deceased person. Notaries whose actions violate these can be given sanctions imposed by the Honorary Board of the Indonesian Notary Association such as a warning warning, or even dismissal from the membership of the Indonesian Notary Association.

Criminal report (if there is suspicion of intent or forgery) Section 263 of the criminal code on document forgery, as in this case the notary has fulfilled the element mentioned that the name of the person who has long died but seems to be alive and signed the deed of binding sale and purchase made by a notary. Cancellation of the deed in the Court of the defendant can apply for cancellation or deletion of the deed through the litigation channel.

Associated with the theory of legal protection according to Philipus M. Hadjon, legal protection for citizens is divided into two forms : 1. Preventive legal protection is aimed at preventing the violation of rights through rules, procedures and supervision . 2. Repressive legal protection is given after a violation of rights, through legal remedies such as a lawsuit to court.

The principle of Consumer Protection in analogy to the relationship of Legal Services is the right to clarity of information, the right to protection from dishonest practices. The form of legal protection for those who face losses as follows: a) lawsuit against the law (PMH) the aggrieved person has the right to file a civil lawsuit against the Notary who made the deed by negligence or mistake, other parties who participated in the series of unlawful acts .Claims can include cancellation of defective deeds and return of Rights that have been transferred illegally (such as return of rights to the name) and compensation for material and immaterial losses; and b) cancellation of the Certificate of right of the face may request the court to cancel the certificate of right to land obtained under a legally defective deed, order the Land Office (BPN) to make the cancellation and reverse the name of the certificate to the entitled party. Administrative protection, the aggrieved person can also file a land administration dispute with the National Land Agency (BPN) to cancel the certificate issued under the legal Disability Act, although this path generally strengthens the litigation path and ethical and criminal reports against notaries if elements of gross violations are found, the aggrieved person can report the notary to the notary's regional supervisory Majeelis for examination of the code of ethics and administrative sanctions. If it has criminal elements (such as forgery of letters), report to the police for criminal proceedings in accordance with Section 263 of the criminal code on forgery of letters.

Special position authentic deed, although the notarial deed in principle has the power of perfect proof, if proven legal defects (such as false signatures, unauthorized faces, or notary negligence), then the deed can be set aside and also the judge has the authority to declare void and enforce the rights of the injured party.

Those who are harmed by a legally defective authentic deed are entitled to full legal protection, whether through civil lawsuits for cancellation of deeds and certificates, claims for compensation, and administrative or criminal reporting against negligent or unlawful officials. The decision of the Supreme Court in this ruling provides a clear example that the rights of the face remain protected even though the deed is made by a public official such as a notary.

It is supposed that the notary ensures the correctness, identity and legal capacity of the addressees. By including the name of the person who has been negligent and violated his professional obligations this indicates the existence of unlawful acts by the notary. The reason that the notary only receives data from the facing cannot relieve the notary of the responsibility for checking the validity of the identity, especially when it comes to the deed of sale and purchase of land that results in a change in land rights.

Unlawful acts (PMH) , based on the elements of Section 1365 of the Civil Code on unlawful acts, there are four elements that must be met , namely the existence of an act (positive or negative), the act is against the law, there is a loss, there is a causal relationship between the act and the loss. As a result of the law of a defective deed, namely an authentic deed containing a legal defect (for example, made on the basis of a false identity or false signature) does not have the power of proof as an authentic deed, the deed can be declared null and void and cannot be used as a basis for transferring rights.

According to Satjipto Rahardjo, responsibility is the human awareness of his behavior or actions that are intentional or not, which cause consequences for other parties, as well as the willingness to accept legal consequences for his actions. Meanwhile, John Salmond argues that in a legal context, responsibility is the obligation to bear the legal consequences of an act, especially when the act causes harm to another person. Civil liability if the notary makes a deed that contains legal defects (such as making a deed in the name of a deceased person), and the act harms the other party. then the notary can be sued in a civil manner under Section 1365 of the Civil Code (claim for compensation for unlawful acts) Section 84 UUJN, which states that the Notary is responsible for every deed he made, if the notary is proven guilty and negligent (for example, returning financial losses, compensating for losses due to changes in the status of property rights).

Administrative liability if the notary is proven to have violated office procedures (for example, not checking the identity of the perpetrator correctly), then administrative sanctions can be imposed by the regional /regional/ central Supervisory Council of notaries in the form of a written warning, suspension, temporary dismissal, or permanent dismissal seen in Section 85-86 UUJN. And criminal liability in this there are indications of forgery of documents (Section 263 of the criminal code), making false statements in the authentic deed (Section 266 of the Criminal Code).

The notary's responsibility for legally flawed actions in this case is that notary Zainuddin Thohir drew up deed of sale No. 42 listing Umulchlisun as the party present and signing, even though Umulchlisun had been deceased since 2006. In accordance with Article 16 Paragraph (1) letters A and c of Law Number 30 of 2004 concerning the Position of Notary (UUJN), notaries are required to act honestly, thoroughly, independently, impartially, and protect the interests of the parties concerned, as well as read the deed in front of the attendees and witnessed by witnesses.

Therefore, the notary should ensure the truth, identity, and the legal capacity of the perpetrators. By listing the names of people who have negligent and in violation of professional obligations this shows the existence of acts against the law by a notary. The reason that notaries only receive data from the facing cannot relieve the notary from responsibility for checking the validity of identity, especially in terms of land sale and purchase deed which resulted in a change in land rights.

Unlawful acts (PMH), based on elements of Section 1365 Civil code of unlawful acts, there are four elements that must be fulfilled, namely the act (positive or negative), the act against law, there is a loss, there is a causal relationship between the act and the loss. In this case the act of making a deed of sale and purchase on behalf of a person who has death is an unlawful act, the loss suffered by Parlan because his land was transferred illegally, and there is a direct causal relationship between deed of the problem and the losses suffered. There true The Supreme Court declared the actions of defendants I, II, and III are against law.

Legal consequences of the defective deed that is authentic deed containing defects law (for example, made on the basis of false identity or false signature) does not possess the power of proof as an authentic deed, the deed can be stated null and void and cannot be used as a basis for the transfer of rights in it is transitional land rights). In this decision both deed of sale binding Purchase or deed of sale and purchase, and even a new title certificate in the name of Andri Setiadi was disqualified for standing on a defective deed.

In the case of decision 154 K/Pdt/2016, notaries remain responsible for the deeds they draw up, including the formal accuracy of the parties' identities, and deeds drawn up based on false identities are void and invalid. In land sale and purchase transactions, all parties, including notaries and PPATs, are required to exercise caution in order to avoid legal defects in the future. The legal basis for notary liability is regulated in several regulations, including Law Number 30 of 2004 concerning the Notary Profession (UUJN), together with Law Number 2 of 2024 (Amendment to UUJN). The Civil Code (KUHPperdata), specifically Article 1365 concerning unlawful acts, and the Criminal Code (KUHP), for cases of forgery or false testimony (Article 263 KUHP).

Civil liability if the notary makes a deed containing legal defects (such as making a deed in the name of a deceased person), and the act harms the other party. then the notary can be sued in a civil manner under Section 1365 of the Civil Code (claim for compensation for acts against Act) Section 84 UUJN, which states that the Notary is responsible for every deed made, if the notary is found guilty and negligent (eg return financial losses, compensate for losses due to changes in status property rights).

Administrative liability if the notary is proven to have committed violation of office procedures (e.g. not checking the identity of the person correctly), then it can be sentenced to administrative sanctions by the Supervisory Board Regional/ region / notary Center in the form of a written reprimand, suspension, dismissal temporary, or permanent dismissal seen Section 85-86 UUJN. And Criminal liability in this there are indications of forgery Document (Section 263 of the criminal code), making false statements in the authentic deed (Section 266 of the Criminal Code). In the context of decision 154 K / Pdt/2016 in this case Notary Zainuddin Thohir was declared negligent because he made a deed of binding sale and purchase on behalf of someone (Umulchlisun) who had died. The Supreme Court held that the deed is legally flawed and the consequences the law was canceled, the notary imposed civil liability for return the legal status of the land to the rightful party.

Facing the disadvantaged due to the manufacture of authentic deed for the disabled law entitled to obtain a form of legal protection against facing harmed. People who have been affected by a lack of reading and explained the intent and purpose of its contents by a notary into a legal defect, deed it does not meet the legal requirement for an act to be authentic. and down to deed under hand and can be a null and void deed, because the face of not receiving the results of a deed made by Notary Zinuddin Thohir and has taken the legal route to fight for his rights.

Legal protection from civil claims based on default or tort (*onrechtmatigedaad*) by a notary (Section 1365 Civil code), as evidenced by the deed that has been made by a notary and make losses to the face of the notary must be given sanctions in the form of pay compensation in accordance with the decision of the judge. Report to Notary Supervisory Board based on the provisions of the notary position law related violation of the code of ethics or violation of the law

by a notary, because in this case notary concerned has been proven to violate the code of conduct Action which is contrary to the provisions of Section 15 UUN create an invalid deed and falsify the name of the deceased. The notary his actions violate the sanctions imposed by the council can be given Indonesian Notary Association honor as a warning, warning, or even termination of membership of the Indonesian Notary Association.

Criminal report (if there is suspicion of intent or forgery) Section 263 Criminal code on the forgery of documents, as in this case the notary has meet the element mentioned that the name of the old faces dead but still alive and signed the deed of sale binding purchase made by a notary. Cancellation of the deed in the court may face apply for cancellation or removal of the deed through litigation. Special position authentic deed, although notarial deed in principle have the power of perfect proof, if proven flawed law (such as false signature, unauthorized facing, or notary negligence), then the deed can be waived and also the judge is authorized to declare void and upholding the rights of the injured.

Persons who suffer losses due to legally defective original deeds are entitled to full legal protection, either through civil lawsuits to cancel deeds and certificates, claims for compensation, or administrative reports or criminal charges against officials who are negligent or violate the law. The Supreme Court's ruling in this case provides a clear example that the rights of the parties remain protected even if the deed was drawn up by a public official such as a notary.

CONCLUSION

Based on the results, it can be concluded that notaries who do not carry out obligations as stipulated in the law Notary position, especially related to notary obligations that are not carry out the obligation to read and explain the purpose and the purpose of the contents of the deed to the facing party can be held responsible legal liability for such negligence resulting in a deed of loss authenticity and cause potential disputes, still bear full legal responsibility for legal consequences arising from such negligence makes the deed lose its formal validity.

Legal protection for parties who suffer losses due to deeds that are not read and not explained the purpose can be pursued through civil lawsuits, criminal reporting if elements of intent or fraud are found., as well as administrative complaints, to the Supervisory Council and the Ministry of Law and human rights so that the rights of the injured party remain guaranteed certainty and recovery in accordance with the provisions of legislation. Notaries who do not carry out the obligations as stipulated in the Notary Public Act, especially related to the obligations of notaries who do not carry out the obligation to read and explain the intent and purpose of the contents of the deed to the facing party may be held legally liable because such negligence results in the deed losing its authenticity.

Decision of the judge in the case of the Supreme Court Decision No. 154 K / PDT / 2016 related to notary negligence that does not meet the procedure properly executed, be evidence that the judiciary performs the function of legal certainty and justice as well as providing foundation of jurisprudence so that similar acts are not repeated in the future upcoming. and making authentic deed into an assertion that courts play an important role in upholding the principle of certainty law and justice, as well as provide a deterrent effect for more notary careful and professional in carrying out the duties of his department in time upcoming.

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