

Legal Liability Of Ppat Due To Legally Defective Land Sale And Purchase Deed (Study of Supreme Court Decision No. 3507 K/Pdt/2023)

Tinrif Valins Dongoran¹; Roida Nababan²; Sovia Febrina Tamaulina Simamora³.

Law Study Program, Faculty of Law, HKBP Nommensen University, Medan City, North
Sumatra Province, Indonesia

tinrif.dongoran@student.uhn.ac.id, roida.nababan@uhn.ac.id, sovia.simamora@uhn.ac.id

Manuscripts received : 01/02/2026, Revision and Review : 22/02/2026, Approved 24/02/2026

Abstract

Land is an important resource for human life, so the transfer of land rights must be carried out in accordance with legal provisions to ensure legal certainty and protection. Land is an essential resource for human life; therefore, the transfer of land rights must be carried out in accordance with legal provisions to ensure legal certainty and protection. The Land Deed Official (PPAT) has a strategic role in drafting deeds of transfer of land rights, particularly deeds of sale and purchase, which must fulfill the formal and material requirements as stipulated in statutory regulations. This study aims to examine the implementation of the transfer of certified land rights as regulated by law and to analyze the legal responsibility of the PPAT for a land sale and purchase deed declared legally defective based on Supreme Court Decision Number 3507 K/Pdt/2023. The method used in this research is normative juridical, employing statutory, conceptual, and case study approaches. Data were obtained through library research on primary, secondary, and tertiary legal materials and were analyzed qualitatively using legal reasoning. The results of the study indicate that a PPAT bears legal responsibility if negligent in carrying out the pre-deed, deed-making, and post-deed procedures, resulting in the sale and purchase deed losing its legal validity. Such responsibility includes civil liability, administrative liability, and professional ethical responsibility. The Supreme Court decision emphasizes that drafting a deed without the consent of the lawful landowner constitutes an unlawful act and renders the deed null and void by law. Therefore, compliance by the PPAT with legal procedures is a key factor in ensuring legal certainty and the protection of land rights.

Keywords: *Transfer of Land Rights, Legal Responsibility, Unlawful Act*

A. Introduction

Tanah merupakan sumber kebutuhan hidup bagi manusia, karena fungsi tanah selain sebagai tempat tinggal, juga sebagai sarana mata pencaharian. Semakin banyak orang dalam memenuhi kebutuhan hidup, maka orang-orang tersebut semakin memerlukan ketersediaan tanah. Berdasarkan Pasal 19 UU No. 5 Tahun 1960 tentang ketentuan-

ketentuan pokok Agraria jo. Pasal 37 ayat (1) PP No. 24 tahun 1997 tentang pendaftaran tanah, yang pada pokoknya menentukan mengenai pendaftaran terhadap peralihan hak atas tanah dengan cara jual beli hanya dapat dilakukan apabila dibuktikan dengan adanya akta jual beli (AJB) yang dibuat oleh authorized officials according to the provisions of applicable laws and regulations (Andy, 2014).¹

The land deed making official (PPAT) which in Dutch is called a *land titles registrar*, has a very important position and role in the life of the nation and state because this official is authorized by the state, to make a deed of transfer of land rights in the Republic of Indonesia.² The provisions of the land ownership transfer deed must be made by the land deed making official (PPAT), based on government regulation number 37 of 1998 concerning the role of the land deed making official, in addition to providing provisions regarding the main duties and authority of the PPAT appointed by the government as clearly described in the articles, also the most important thing is to provide quite clear provisions that the appointed PPATs carry out service duties to the community in a broad sense, especially in the field of land and legal administration, they are responsible for ensuring the process of making land deeds in accordance with the applicable law. Referring to this, the land deed making official is required to be careful, meticulous, meticulous and meticulous in making the deed in order to avoid the responsibility that will be imposed on him. PPAT as a public official is authorized to make deeds of transfer of land rights, deeds of encumbrances of land rights and deeds of power of attorney to impose land rights.

Proof in disputes as described in the Supreme Court decision No. 3507 K/Pdt/2023 not only serves to determine whether a sale and purchase deed has legal force, but also serves as a basis for judges to assess the legal responsibility of PPAT, where in making the deed both regarding its form, content and manner of manufacture, as stipulated in Government Regulation No. 24 of 2016 concerning PPAT. However, in practice, the making of sale and purchase deeds is sometimes not in accordance with the legal provisions that have been set, so it risks legal certainty for the ownership of land rights (Febrina, 2019).³ A deed of sale and purchase is an authentic deed that has perfect evidentiary value to the parties as mentioned in Article 1870 of the Civil Code. So that there are often problems with the deed, the consequences are canceled or declared null and void by the court. (Wardhani, 2017).⁴

¹Andy Hartanto, Land Law (Characteristics of Buying and Selling Land That Has Not Been Registered Land Rights). Second Print. Surabaya, LaksBang Justitia Surabaya, 2014

² H. Salim, HS., Techniques for Making Deeds of Land Deed Making Officials, Raja Grafindo Persada, Jakarta, 2016, p. 85.

³ Febrina, et al 2019 Responsibilities of PPAT in the making of AJB, PP RI No. 24 of 2016 concerning PPAT. Journal of the University of Riau Islands 2019. pp.144-150

⁴ L C Wardhani, 2017, Responsibility/PPAT Against Deeds Canceled by the Court, Master of Notary, Faculty of Law, Islamic University of Indonesia, Yogyakarta, Number 1m Volume 2.

The cancellation of the deed is not only due to the fault of the parties who made the agreement but can also be caused by the negligence of PPAT in making the deed, the aggrieved party can take legal remedies both in litigation and non-litigation (Muyassar, 2019). In the process of settlement in court, PPAT is often withdrawn as a party to the defendant and even the defendant as an effort so that PPAT must provide information about the deed that is evidence in court examination. (Sukisno, 2008).⁵

Penulis mengangkat kasus putusan pengadilan nomor 3507 K/Pdt/2023, notaris yang juga menjabat sebagai PPAT dinyatakan telah melakukan perbuatan melawan hukum dan akta jual beli nomor 134/2016 dan akta jual beli nomor 135/2016 yang dibuat oleh PPAT tersebut declared invalid or legally defective and does not have binding legal force. The PPAT makes a deed of sale and purchase without the consent and knowledge of the object owner and there is engineering by the buyer which in this case is very detrimental to the owner of the object. This study not only describes the normative form of PPAT's responsibility, but specifically analyzes the construction of the Supreme Court's considerations in determining the limit of PPAT's position responsibility when the sale and purchase deed is declared null and void.

The Plaintiff is on behalf of Retno Probowati, the Defendant (PPAT Roy Pudyo Hermawan¹, Anita Susanti², H. Triyo Sugeng³, Henky Indresworo⁴). In that case, the plaintiff Retno Probowati owned two certified plots of land, the land was used as collateral for the debt to the defendant H. Triyo Sugeng³. Because he was unable to pay off the debt on time, the defendant H. Triyo Sugeng³ unilaterally transferred the rights to the land to the defendant Henky Indresworo⁴ by making sale and purchase deeds No.134/2016 and 135//2016 through PPAT Roy Pudyo Hermawan¹. The plaintiff made a lawsuit against the defendant H. Triyo Sugeng³ because he considered the sale and purchase deed to be legally defective and an unlawful act. In the study of the decision, the author seeks to comprehensively analyze the legal liability of PPAT due to the legally defective land sale and purchase deed in the Supreme Court decision No. 3507 K/Pdt/2023, such as civil liability (PMH Article 1365 of the Civil Code), administrative responsibility (through BPN/supervisory council), and moral ethical responsibility (PPAT Code of Ethics). Based on Article 1320 of the Civil Code, in the sale and purchase deed, there must be an agreement between them that binds them, namely an agreement between the buyer and the owner of the land/object. This means that land ownership can only be done in a sale and purchase with the consent of the landowner.

B. Research Methods

In writing this journal, the author uses normative juridical research methods that have qualitative properties. This research method is a research method that focuses on

⁵ Sukisno, D. (2008). "Photocopy of Deed Minutes and Notary Summons". Rombbar Hukum Vol. 20 No. 1

understanding and deepening legal norms, laws and regulations, and legal issues related to the writing of this journal. This journal research method also uses the method of collection through library *research*, namely the collection of data from legal materials available in legal literature, laws and regulations, legal journals, books, scholars' opinions (doctrine), legal cases, jurisprudence, and court decisions. Meanwhile, in the data analysis method, the author uses a qualitative approach method that combines primary, secondary, and tertiary legal sources as supporting materials in writing this journal.

C. Results and Discussion

1. The process of implementing the transfer of certified land rights regulated in the Law

The transfer of land rights that have been certified is a legal act that has implications for the transfer of legal relations between the subject of the law and the object of land rights. In the national agrarian law system, the regulation is based on law number 5 of 1960 concerning the basic regulations of agrarian principles (UUPA) as the main normative basis for land law in Indonesia. The Basic Agrarian Law emphasizes through article 19 of 1960 that the government organizes land registration to ensure legal certainty, including against any transfer of land rights.⁶ Further arrangements regarding the registration of the transfer of land rights that have been certified are stipulated in government regulation number 24 of 1997 concerning land registration. In the main agrarian law, it is stated that in the conception of ownership there is a religious communalist element, meaning that the provisions of Indonesian law see that the land is common property given by the creator for the welfare of the community.

The registration process for the transfer of land rights has several stages, namely the first stage in the implementation of the transfer of certified land rights is the fulfillment of the legal conditions of the agreement as stipulated in the civil code article 1320, namely the agreement of the parties, the ability to act, certain objects, and halal causes, the second stage is the making of a deed of transfer of rights by PPAT and the third stage is the obligation Registration of the transfer of land rights at the land office.⁷

The implementation of the transfer of rights to certified land through sale and purchase must be carried out by the land deed making official (PPAT) in accordance with the provisions of laws and regulations. As a general official, PPAT is not only required to understand land law normatively, but also responsible for carrying out all stages of making deeds procedurally to ensure legal certainty, administrative order, and

⁶ Harsono, Boedi. *Indonesian Agrarian Law: History of the Establishment of the Basic Agrarian Law, Its Content and Implementation*. Jakarta: Djambatan, 2008.

⁷ Adrian Sutedi, *Transition of land rights and their registration*, Jakarta, Sinar Grafika, 2007.

legal protection for the parties.⁸ The necessity of a PPAT deed in the sale and purchase of land as stipulated in Article 19 of Government Regulation No. 10 of 1961 turns out to contain a weakness, because the term "must" is not accompanied by sanctions, so that the PPAT deed cannot be interpreted as a condition for the "existence" of the deed of handover. According to Boedi Harsono, although Article 23 paragraph (2) of the UUPA states that the title was transferred at the time the PPAT deed was made (the PPAT deed is proof that the land rights have been transferred to the buyer), the evidence has not yet applied to the third party, because what the third party must know is what is stated in the land book and the certificate of rights concerned. Thus, even though the buyer has been the owner since the sale and purchase, his position as the owner is only perfect (in terms of proof) after the registration of the transfer of land rights given by the head of the land office is carried out. This opinion contains weaknesses, because "The PPAT Deed has a function as a tool to register (Article 22 paragraph (3) of Government Regulation No. 10 of 1961), so it does not determine the birth of the right. In land law, land buying and selling transactions can be carried out by PPAT, sub-district heads can also be appointed as PPAT in areas where there are not enough PPAT.⁹ In addition, because its function in the field of land registration is very important for people in need, this function must be carried out throughout the country. Therefore, in areas where there are not enough PPAT, the sub-district needs to be appointed as a temporary PPAT. The land sale and purchase deed is a very important thing that functions for the transfer of ownership of land and the occurrence of land ownership.

2. PPAT's Liability to Parties Harmed by the Deed of Sale and Purchase which it sees as legally defective (Study of Supreme Court Decision No. 3507 K/Pdt/2023)

Land deed making officials (PPAT) are public officials who are authorized by the state, especially by the Ministry of Agrarian and Spatial Planning/National Land Agency (ATR/BPN) to make authentic deeds regarding certain legal acts related to land rights or property rights to apartment units. As a public official, PPAT is authorized to make deeds regarding land must have special abilities and skills in the field of land so that the deed it makes does not cause problems in the future, considering that the deed it makes is an authentic deed that can be used as evidence and has absolute power regarding the things or events mentioned in the deed. An authentic deed is a deed made in the form specified by law or in the presence of an authorized public official, the requirement for an authentic deed is to be made by an authorized official, made at the place of residence

⁸ Adjie, Habib. Notary Law and PPAT Indonesia (Thematic Interpretation of the Law on the Notary Position and PPAT). Bandung: Refika Aditama, 2018.

⁹ Article 5 paragraphs (1) and (3) of Government Regulation No. 37 of 1998 concerning Regulations on the Position of Land Deed Making Officials (Statute Book of 1998 Number 52).

of the official and its form in accordance with the law based on Article 1868 of the Civil Code.¹⁰

Based on Article 1 of the regulation of the head of the national land agency number 1 of 2006 states that "PPAT is a public official who is given the authority to make authentic deeds regarding certain legal acts regarding land rights". In carrying out its duties and positions that are authorized, PPAT makes an authentic deed, of course, the deed has consequences in the form of responsibility from the results of its work. The responsibility is a consequence of his position as a public official. The form of PPAT responsibility can be divided into 3 categories, namely:

a. Civil Liability

PPAT's civil liability can be based on the provisions of Article 1365 of the Civil Code regarding unlawful acts. To give rise to civil liability, the elements of unlawful acts, mistakes, losses, and the causal relationship between these acts and losses must be met.¹¹

Regarding the error (*beroepsfout*) of the PPAT, of course, it can be examined about the form of the error/omission, namely breach of promise (default) or unlawful act (*onrechtmatige daad*). Based on the principles of civil law, PPAT can be held accountable in the form of compensation to the aggrieved party. This is in line with the opinion of Munir Fuady who stated that public officials can be held civil liable if their actions cause losses due to abuse of authority or neglect of office.¹² This of course depends on the qualification of the act that caused the error. To determine that an act can be qualified as an unlawful act, four conditions are required, namely: a) contrary to the legal obligations of the perpetrator, b) contrary to the subjective rights of others, c) contrary to morality, and d) contrary to propriety, thoroughness and prudence.¹³

If PPAT has been negligent in making the deed of sale and purchase deed with an unlawful act based on the application for leniency, moreover in this case it is more inclined to an unlawful act that violates the provisions of Article 433 of the Civil Code regarding the testimony of the blood relatives of the prospective defendant in the application for leniency before the court, while in the sense of criminal action PPAT the element of intentionality must be carried out not the element of negligence, while in this case, PPAT committed negligence in making a deed of sale and purchase

¹⁰ Ahmad, Khairuddin, 2009, PPAT as a Special Officer in the Land Sector, Publisher Media Ilmu, Jakarta.

¹¹ Ibid., p. 35.

¹² Ibid., p. 41.

¹³ R., Agustina. (2003). *Unlawful Acts*. Jakarta: Postgraduate Faculty of Law of the University of Indonesia.

deed based on an application for protection that was not considered procedural correctness.¹⁴

The legal consequence of the following civil liability is the birth of a legal obligation for PPAT to provide compensation to the aggrieved party. The compensation can be in the form of material damages, such as financial losses due to the cancellation of transactions, immaterial damages, such as reputational damage or psychological suffering, restoration of circumstances (*restitutio in integrum*) if possible, cancellation of deeds if proven to be legally flawed. Based on the description of the theory of civil liability, there are unlawful acts committed by the PPAT because they have made a deed of sale and purchase deed without the consent of the blood relatives without exception, because the party is under the protection (Article 433 of the Civil Code) which is detrimental to the party. In this civil liability, claims against PPAT can be filed through civil lawsuits in district courts, tort lawsuits, lawsuits for unlawful acts, and lawsuits for cancellation of deeds. Public officials can be held civil liable if there is an abuse of authority or negligence of office that causes losses.¹⁵

b. Criminal Liability

Land deed making officials (PPAT) are public officials who exercise state authority in the field of land administration. Although PPAT does not include law enforcement officials, from a criminal law perspective, PPAT is still a legal subject who can be held criminally responsible if in carrying out its position he commits an act that meets the elements of a criminal act.¹⁶ Every criminal act committed must contain elements of the perpetrator's fault, namely intentionality (*opzet*) and caution (*culpa*). Regarding the duties of PPAT in making deeds that are related to the aspects of the provisions of criminal acts, where in a state of consciousness committing prohibited acts or acts, they can be subject to criminal liability in accordance with sanctions according to the Criminal Code (KUHP). In criminal cases related to the criminal aspect of making PPAT deeds, where law enforcement will attract PPAT who is suspected of committing criminal acts for making various acts of forgery or forging letters. The criminal provisions that govern the act in question are as stated in Articles 263, 264, 266, Jo. 55 and/or 56 of the Criminal Code.¹⁷ If PPAT deliberately or grossly negligently violates the provisions of the law so as to harm other parties, then the protection of the position cannot be used as a reason for criminal expungement. This is in line with the principle of *equality before the law*

¹⁴ Marusdi Utoyo, Kinaria Afriani, Rusmini, Husmaini, "Intentional and Unintentional in Indonesian Criminal Law", *Lex Librium: Journal of Law* Vol 7 No 1 (2020), p. 80

¹⁵ Fuady, Munir, *Unlawful Acts*, Citra Aditya Bakti, Bandung, 2013.

¹⁶ Andi Hamzah, *Indonesian Criminal Law*, Jakarta: Sinar Grafika, 2019, p. 91.

¹⁷ Setiawan, R. (1991). *An Elementary Review of Unlawful Acts*. Bandung: Bina Cipta.

which emphasizes that state officials are not immune to criminal law.¹⁸ According to Wirjono Prodjodikoro, intentionality is very important in crime because most criminal acts have an element of intentionality or *opzet*, not an element of *culpa*. This is feasible, because usually the one who deserves a criminal penalty is a person who does something intentionally.¹⁹ In relation to the above, a PPAT cannot be held criminally responsible for the deed made by the PPAT if he has carried out his duties properly in accordance with or based on the procedures that have been stated in the relevant laws and regulations. This is legitimized in Article 266 of the Criminal Code.

The legal consequences of criminal responsibility are the imposition of criminal sanctions, such as imprisonment, fines, additional crimes such as revocation of office rights, registration in the criminal register, which has an impact on the reputation and sustainability of the position. In addition, the existence of a criminal verdict with permanent legal force can be the basis for permanent dismissal from PPAT's position. Criminal charges can be made through reports or complaints to law enforcement officials, investigation and investigation processes, prosecutions by prosecutors, and trials in criminal courts.

c. Administrative Responsibilities

PPAT's administrative liability is, the PPAT in this case has been negligent in exercising the authority of the PPAT position itself, because in article 39 paragraph (1) letter g of PP 24 of 1997, it is stated that if the conditions in the regulation concerned are not implemented, PPAT is obliged to refuse to make the ²⁰authentic deed, the condition that was violated in the context of this case is that the PPAT did not check or reconfirm the correctness of the approval of the application for leniency obtained by the seller, PPAT in the case should have known the indications for the application of formal conditions that have found that the conditions for the application for leniency were not met and must refuse to make the authentic deed, with the non-fulfillment of the formal conditions as the basis for making the deed of sale and purchase, This violation can be charged with Article 62 of Government Regulation no. 24 of 1997 which states that if you do not implement Article 39 of the regulation (i.e. PPAT is obliged to refuse to make a deed due to the reason of not fulfilling the conditions for the application for support, subject to administrative sanctions in the form of reprimands, written reprimands to dismissal from office as PPAT, and it may be possible to demand compensation by the parties who suffer losses caused by making the authentic deed.

¹⁸ Sudarto, *Law and Criminal Law*, Bandung: Alumni, 2013, p. 47.

¹⁹ Wirjono Prodjodikoro. *Principles of Criminal Law in Indonesia*. (Bandung, Refika Aditama, 2003). 65-66.

²⁰ Government Regulation on Land Registration, Government Regulation No. 24 of 1997, LN No. 59 of 1997, Article 39 paragraph (1) letter e

Based on ATR/BPN government regulation number 2 of 2018, administrative sanctions against PPAT can be in the form of written reprimands, temporary dismissals, and permanent dismissal from office.²¹ This administrative responsibility of PPAT includes tax responsibility which is an additional authority of PPAT given by tax law. In this regard, PPAT can be subject to administrative sanctions in the form of fines for violations of Article 91 paragraph (1) of Law No. 28 of 2009 concerning regional taxes and regional levies, which expressly states: "Land deed making officials can only sign a deed of transfer of rights to land and/or buildings after the taxpayer submits proof of tax payment". As a result of these acts, PPAT can be subject to sanctions as stipulated in article 93. Administrative sanctions are not solely repressive, but also have preventive and educational functions. With the existence of administrative sanctions, it is hoped that PPAT will be more careful in exercising its authority and upholding the principles of good *governance*.²²

The legal consequences of administrative responsibility can be in the form of sanctions imposed by the supervisory and supervisory agencies, namely the Ministry of ATR/BPN. The sanctions include written reprimands, temporary dismissal, dismissal with honor, dismissal without honor, administrative fines (related to tax obligations). Administrative sanctions do not require proof of the element of guilt as in the criminal law, but it is sufficient to have a violation of the obligations of office. Demands for administrative responsibility can be submitted through public complaints to the BPN regional office, an examination of the PPAT supervisory and supervisory council, an internal evaluation by the ministry of ATR/BPN. administrative sanctions have a repressive as well as preventive function to maintain the integrity and professionalism of PPAT positions.

D. Conclusions and Recommendations

The implementation of the transfer of rights to certified land through sale and purchase is a formal and procedural legal process that must be carried out by PPAT in accordance with the provisions of laws and regulations. The process is not only related to the making of deeds, but includes the stages of pre-making deeds, deeds, and post-deeds that are systematically interrelated. Failure to carry out one of these stages has the potential to cause legal defects in the deed and weaken the function of the deed as authentic evidence, thereby disrupting legal certainty in the land sector. PPAT has a multidimensional legal responsibility when the sale and purchase deed it makes is declared legally defective and detrimental to other parties. This responsibility is not only limited to the civil realm in the

²¹ Regulation of the Minister of ATR/BPN Number 2 of 2018 concerning the Development and Supervision of PPAT.

²² Ridwan HR, *State Administrative Law*, Jakarta: RajaGrafindo Persada, 2016, p. 89.

form of compensation obligations due to unlawful acts, but also includes administrative responsibilities through coaching and supervision mechanisms by ATR/BPN, as well as professional ethical responsibilities based on the PPAT Code of Ethics. Under certain conditions, if there is an element of intentionality or gross negligence, PPAT can even be held criminally liable.

Supreme Court Decision Number 3507 K/Pdt/2023 emphasizes that the making of a sale and purchase deed without the consent of the legitimate landowner is an unlawful act that results in the nullity and nullity of the deed. This decision also strengthens the principle that PPAT not only functions as a formal recorder of the legal acts of the parties, but also has an active obligation to carry out verification and juridical testing on the subject and object of the transfer of land rights. Thus, the position of PPAT cannot be understood administratively alone, but as a *guardian of legal certainty* in the national land registration system.

References

A. Legislation

- Indonesia. *Civil Code (Burgerlijk Wetboek)*. Official Gazette 1847 No. 23.
- Indonesia. Regulation of the Minister of Agrarian and Spatial Planning/Head of the National Land Agency Number 2 of 2018 concerning the Development and Supervision of Land Deed Making Officials.
- Indonesia. Government Regulation Number 24 of 1997 concerning Land Registration. Statute Book of the Republic of Indonesia Number 59 of 1997.
- Indonesia. Government Regulation Number 37 of 1998 concerning Regulations on the Position of Land Deed Making Officials. Statute Book of the Republic of Indonesia No. 52 of 1998.
- Indonesia. Government Regulation Number 37 of 1998 concerning Regulations on the Position of Land Deed Making Officials, Article 5 paragraphs (1) and (3).

B. Books

- Adjie, Habib. *Indonesian Notary and PPAT Law (Thematic Interpretation of the Law on the Notary and PPAT Positions)*. Bandung: Refika Aditama, 2018.
- Ahmad, Khairuddin. *PPAT as a Special Officer in the Land Sector*. Jakarta: Media Ilmu, 2009.
- Arikunto, Suharsimi. *Research Procedure: A Practical Approach*. Jakarta: Rineka Cipta, 2002.
- Hamzah, Andi. *Indonesian Criminal Law*. Jakarta: Sinar Grafika, 2019.
- Harsono, Boedi. *Indonesian Agrarian Law: History of the Establishment of the Basic Agrarian Law, Its Content and Implementation*. Jakarta: Djambatan, 2008.
- Very well, Andy. *Land Law (Characteristics of Buying and Selling Land That Has Not Been Registered Land Rights)*. 2nd ed. Surabaya: LaksBang Justitia, 2014.
- HR, Ridwan. *State Administrative Law*. Jakarta: RajaGrafindo Persada, 2016.
- Marzuki, Peter Mahmud. *Legal Research*. 6th ed. Jakarta: Kencana Prenada Media Group, 2005.
- Prodjodikoro, Wirjono. *Principles of Criminal Law in Indonesia*. Bandung: Refika Aditama, 2003.
- R., Agustina. *Unlawful acts*. Jakarta: Postgraduate Program, Faculty of Law, University of Indonesia, 2003.
- Salim HS. *Techniques for Making Deeds of Land Deed Making Officials*. Jakarta: RajaGrafindo Persada, 2016.
- Setiawan, R. *An Elementary Review of Unlawful Acts*. Bandung: Bina Cipta, 1991.
- Soekanto, Soerjono. *Introduction to Legal Research*. Jakarta: University of Indonesia Press, 2012.
- Soekanto, Soerjono, and Sri Mamudji. *Normative Law Research: A Brief Overview*. Jakarta: RajaGrafindo Persada, 2003.
- Sweat. *Law and Criminal Law*. Bandung: Alumni, 2013.
- Sugiyono. *Quantitative, Qualitative, and R&D Research Methods*. Bandung: Alfabeta, 2012.
- Sutedi, Adrian. *Transfer of Land Rights and Its Registration*. Jakarta: Sinar Grafika, 2006.

C. Journal Articles

- Faridy. "Procedure for the Implementation of the Transfer of Land Rights Based on Heirs' Rights." *Legal Studies*, 1-17.

- Febriana, Dhea Tri, and Ahars Sulaiman. "The Responsibility of PPAT in the Making of Sale and Purchase Deeds Based on PP RI No. 24 of 2016 concerning PPAT." *Journal of the University of Riau Islands* (2019): 144–150.
- Marusdi Utoyo, Kinaria Afriani, Rusmini, and Husmaini. "Intentional and Unintentional in Indonesian Criminal Law." *Lex Librium: Journal of Legal Studies* 7, no. 1 (2020): 80.
- Muyassar, et al. "Notary Liability for the Denial of a Certified Land Sale and Purchase Deed by the Injured Party." *Syiah Kuala Law Journal* 3, no. 1 (2019).
- Pratama, Rizky Dwi. "Legal Implications of PPAT Deeds That Do Not Meet Formal and Material Requirements." *Journal of Right-Thinking* 11, no. 2 (2022).
- Rosmidah. "Ownership of Land Rights." *Journal of Innovative Legal Sciences* 6, no. 2 (2013): 63–67.
- Sukisno, D. "Photocopy of Deed Minutes and Notary Summons." *Pulpit of Law* 20, no. 1 (2008).
- Wardhani, L. C. "PPAT's Responsibility for Deeds Canceled by Courts." *Master of Notary, Faculty of Law, Islamic University of Indonesia* 2, no. 1 (2017).