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Lack of Regulations Regarding the Maximum Limit of Compensation That Can Be Charged to Notaries for Negligence in Making Authentic Deeds

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Abstract: Article 84 of Law Number 2 of 2014 concerning the Notary Public (UUJN) stipulates that notaries may be subject to compensation sanctions if they are negligent in making authentic deeds. However, the article does not stipulate a maximum limit for compensation that can be imposed, thus creating a legal vacuum that impacts legal certainty and protection for notaries and the public. This ambiguity opens up opportunities for excessive lawsuits and an imbalance between professional responsibility and legal protection for public officials. This study uses a statutory and conceptual approach by examining the relationship between Article 84 of the UUJN, Article 1365 of the Civil Code concerning unlawful acts, and Article 1243 of the Civil Code concerning breach of contract. The results indicate that the regulation of notary liability is still general and does not fulfill the *lex certa* principle as required by the theory of legal certainty. Comparison with the legal systems in the Netherlands, Germany, and France shows that the regulation of notary liability limits through a system of limited liability and professional liability insurance can provide balanced protection for the profession and service users. This study recommends revising Article 84 of the UUJN by adding provisions on maximum compensation limits, establishing implementing regulations, and implementing a mandatory professional insurance system. These regulations are expected to achieve justice, legal certainty, and proportional protection for all parties.

Keyword: Legal Vacuum, Compensation, Notary, Authentic Deed.

INTRODUCTION

Notaries hold a critical position in the Indonesian legal system, acting as public officials authorized to issue authentic deeds (Ghani et al., 2025). Based on Article 1868 of the Civil Code, an authentic deed is evidence with absolute probative force before the law (Sinaga, 2022). It means that everything stated in the deed is presumed true until proven otherwise. The presence of a notary provides legal assurance regarding the validity of any act, agreement, or legal provision embodied in the deed (Farhana, 2024). This duty demands a

high level of professionalism and caution, as any administrative or substantive error may result in serious legal consequences for the parties (Suci & Sawitri, 2025).

Developments in notarial practice demonstrate an increasing number of lawsuits against notaries, particularly those related to negligence indeed preparation (Afriana, 2020). Such negligence can occur due to errors in verifying the identity of the parties, errors in the wording of the deed, or failure to comply with formal requirements as stipulated in laws and regulations (Lubis & Noor, 2022). As a result, a deed that should have complete evidentiary force can lose its authenticity and be deemed an underhanded deed. This situation not only harms the parties involved but also undermines public trust in the notary profession as guardians of the validity of civil law.

Article 84 of the Notary Law (Law No. 2 of 2014 in conjunction with Law No. 30 of 2004) stipulates that a notary is responsible for all losses arising from negligence in carrying out their duties, including paying compensation, costs, and interest to the injured party (Wibowo et al., 2022). However, this provision does not specify a maximum limit on the liability that can be imposed on a notary. The lack of clear parameters regarding the amount of compensation creates legal uncertainty for the parties involved. In practice, the amount of compensation is often determined based on a judge's interpretation without any standard guidelines to refer to.

The lack of regulation regarding the maximum compensation limit would create an imbalance between legal protection for the public and the protection of the notary profession itself. Notaries who work according to procedures still risk facing unlimited compensation claims if minor administrative or technical errors occur (Abdul, 2022). This situation creates a sense of insecurity in carrying out their duties and has the potential to hinder the optimal implementation of notarial functions. From a legal perspective, this situation can be categorized as a legal vacuum that needs to be filled immediately to ensure justice and certainty (Atikah, 2023).

Research into this issue is relevant because it concerns the protection of two interests simultaneously: the public who use notary services and the professional interests of notaries themselves. The public has the right to be assured that their deeds have legal force and will not cause harm due to the negligence of public officials (Wijaya et al., 2023). On the other hand, notaries also have the right to legal certainty regarding the limits of their liability in the event of unintentional negligence (Suwardiyati & Rustam, 2022). Balancing these two aspects is key to maintaining the notary's social function as a bearer of public trust in the civil sector.

The position of a notary is expressly regulated in Article 1, number 1 of the Notary Law, which states that a notary is a public official authorized to draw up authentic deeds and has other authorities as stipulated in the law (Cahayani, 2024). This position provides legal legitimacy for notaries to carry out public functions despite their independent profession (Febrianty, 2023). Notaries are not merely writers of deeds, but also implementers of the legalization function at the request of the parties, ensuring their legality (Maharani, 2022). This strong legal standing requires notaries to consistently maintain independence, integrity, and thoroughness in all notarial actions (Imani & Basoeky, 2025).

The function of an authentic deed is crucial because it is the primary instrument of evidence in civil law. An authentic deed not only records legal events but also serves as a formal guarantee of the truth of what the parties convey before a notary (Anwary, 2025). Without an authentic deed, many legal transactions cannot be carried out safely due to the lack of a strong evidentiary basis (Ramadhan, 2024). Therefore, the notary's responsibility is integral to the validity of the deed itself. Even the slightest error can have major implications for the validity of the deed's contents and give rise to future legal disputes.

A notary's responsibilities in carrying out their duties include administrative, civil, and criminal liability, depending on the type of error committed (Aulia & Nabilah, 2025). In civil law, a notary's responsibility arises when negligence results in losses for the parties involved (Suparidho & Umami, 2025). This form of liability is regulated in Article 84 of the Notary Law, but without detailed provisions regarding the limits or criteria for compensable losses. It leaves wide room for interpretation for law enforcement in assessing the extent to which a notary's error warrants compensation. Ambiguity is a major source of differing decisions in similar cases.

The theory of legal liability serves as a foundation for understanding notary liability for negligence. Under this theory, anyone who causes harm to another party is obligated to provide compensation commensurate with the degree of their fault. Notaries, as public officials, are also subject to this principle, as their position carries legal consequences inherent in every action (Rizki, 2025). However, the application of this theory requires clear norms to avoid arbitrary interpretations of the extent of liability. When the limits of liability are not clearly defined, the principle of substantive justice can be compromised.

The theory of legal certainty, developed by Hans Kelsen and Gustav Radbruch, emphasizes the importance of clear, consistent, and predictable legal norms in their implementation (Laritmas & Rosidi, 2024). Legal certainty is the essence of every norm governing the responsibilities of public officials, including notaries. When Article 84 of the Notary Law does not stipulate a maximum limit for compensation, the norm fails to fully fulfill the legal certainty principle. Consequently, legal subjects, both notaries and the public, have no clear understanding of the legal consequences of negligence. The situation may lead to injustice and inconsistency in law enforcement.

The theory of legal protection, as proposed by Philipus M. Hadjon, provides the perspective that the law must protect both parties proportionally. Protection for the public must go hand in hand with protection for public officials to create a balance of interests. In the context of notaries, legal protection for the public is realized through liability for compensation, while for notaries, it must be realized through clear limits on the obligations that can be imposed (Asufie & Impron, 2021). Without proportionality, it will lead to inequality that harms one party and disrupts legal justice.

The theories of justice introduced by John Rawls and Aristotle emphasize the importance of a balance between rights and obligations in social relations. The principle can be applied in assessing a notary's liability, not only based on legal consequences but also considering the degree of error, good faith, and professional capacity (Jasmine et al., 2025). Justice in this context does not mean equalizing all cases but rather providing commensurate treatment according to the proportion of the fault. Without rational and measurable compensation limits, substantive justice will be difficult to achieve because a single act of negligence can have disproportionate consequences for the perpetrator.

METHOD

This study uses a normative legal research method with a statutory and conceptual approach. The statutory approach is used to examine positive legal norms governing notary responsibilities, particularly Article 84 of Law Number 2 of 2014 concerning the Office of Notaries, and its relationship to provisions in the Civil Code, such as Article 1365 concerning unlawful acts and Article 1243 concerning breach of contract. This approach aims to identify any legal gaps regarding the maximum limit of compensation that can be imposed on notaries due to negligence in making authentic deeds. Meanwhile, the conceptual approach is used to examine theoretical concepts regarding legal responsibility, legal certainty, legal protection, and justice as an argumentative basis in formulating normative solutions. Through this approach, it will examine applicable legal provisions and explore the justice principles and

responsibility balance in the practice of the notary profession. The data used are primary, secondary, and tertiary legal materials that are analyzed qualitatively to produce logical, systematic, and comprehensive legal arguments. The results of this research are expected to provide a scientific basis for legal reform that guarantees certainty and proportional legal protection for notaries and the public who use legal services.

RESULTS AND DISCUSSION

Analysis of the Regulation of Notary Responsibilities in Positive Law

Article 16 of the Notary Law (Law No. 2 of 2014 in conjunction with Law No. 30 of 2004) stipulates the fundamental obligations of notaries in carrying out their duties. These obligations include acting honestly, independently, impartially, maintaining confidentiality, and ensuring that every deed they create complies with statutory provisions. Fulfilling these obligations is a manifestation of the professional responsibility inherent in a notary's position as a public official. If a notary neglects any of these obligations, they may be deemed negligent and potentially cause harm to interested parties. This negligence forms the basis for legal liability regulated in other articles of the Notary Law.

Article 65 of the Notary Law affirms that notaries are responsible for every deed they create, including the minutes of the deed held in their custody. This means that a notary's responsibility does not end with the signing of the deed but also encompasses the maintenance and storage of documents that serve as legal evidence. This responsibility is inherent and cannot be transferred to another party, as the notary is the legal entity that guarantees the formal accuracy of the deed. If negligence is found in practice that results in formal or material defects in the deed, the notary is responsible for the resulting legal consequences, including compensation, costs, and interest, as stipulated in Article 84 of the Notary Law.

Article 84 of the Notary Law serves as the legal basis governing notary liability for negligence that results in losses for another party. This article states that a notary is responsible for providing compensation, costs, and interest to the injured party. While the wording of this article appears simple, it poses serious problems because it does not specify a maximum limit on the liability that can be imposed on a notary. This ambiguity leaves considerable room for interpretation for judges in determining the amount of compensation to be paid. As a result, notaries are potentially subject to claims for losses disproportionate to the severity of the error.

Notary liability can be classified into three forms: administrative, civil, and criminal. Administrative liability arises when a notary violates ethical and procedural requirements of office, such as failing to attend the oath of office or to record the minutes of a deed. Civil liability arises when the notary's negligence results in actual harm to another party, while criminal liability applies if the notary's actions are found to be intentional or malicious. These three forms of liability demonstrate that the notary's office is not merely formal but also carries broad legal consequences. A clear distinction between these forms of liability is essential to ensure proportionate sanctions are imposed.

The relationship between Article 84 of the Notary Law and the Civil Code (KUHPerdata) demonstrates the link between official liability and civil liability in general. Article 1365 of the KUHPerdata states that any unlawful act that causes harm to another person requires the perpetrator to compensate for the loss. Conversely, Article 1243 of the KUHPerdata stipulates that a party who fails to fulfill an obligation is obligated to pay compensation. These two articles serve as the legal basis for enforcing civil liability against a notary when their negligence is proven to have caused harm. However, the application of these two articles to the notary profession requires adjustments because the notary's position as a public official differs from that of ordinary civil litigants.

The relationship between Article 84 of the UUJN and articles in the Civil Code confirms that the regulation of notary liability remains general. The formulation of the norm, which only contains the phrase "responsible for losses arising from negligence," does not provide guidance on the limits or criteria for assessing losses. In practice, judges use general civil law principles to determine the amount of compensation, ultimately leading to variations in decisions between cases. This situation demonstrates a lack of harmonization between the law on notary offices and general civil law, even though the two should complement each other in providing legal certainty for the public and notaries.

The normative weakness of Article 84 of the Notary Law is evident in the absence of provisions governing the maximum limit of compensation. This absence of regulation leaves notaries vulnerable to lawsuits with unlimited losses. Furthermore, there is no classification of negligence, whether mild, moderate, or severe, which is crucial for assessing the proportionality of responsibility. Another weakness lies in the absence of an official mechanism or institution authorized to objectively determine the nominal number of losses. This gap creates inconsistency in the application of the law and opens up opportunities for abuse in enforcing notarial liability.

The absence of detailed regulations regarding the limits of liability creates legal uncertainty for all parties involved. The public, as users of notary services, lacks a clear reference point regarding appropriate compensation for losses incurred due to notary negligence. Conversely, notaries are also uncertain about the extent of their legal liability for errors that may occur in the course of their duties. This situation impacts not only the legal aspects but also psychologically, as it creates excessive anxiety among notaries in optimally performing their duties. This uncertainty ultimately has the potential to disrupt the effectiveness of public services in the notary sector.

The legal vacuum in Article 84 of the Notary Law has direct implications for the principles of legal certainty and legal protection guaranteed in the national legal system. Without a standard for determining liability for compensation, judges will face difficulties in rendering consistent and fair decisions. The absence of guidelines for the amount of compensation can create the risk of unlimited lawsuits, where aggrieved parties can demand unrealistic amounts of compensation. In some cases, this has the potential to lead to the criminalization of the notary profession, as administrative negligence can be interpreted as a serious violation. This situation erodes public trust in the judicial system and weakens the law's function as a protective instrument.

The lack of clear norms also results in a loss of balance between legal protection for the public and for notaries. The public loses the guarantee that their losses will be adequately compensated, while notaries lose certainty about the limits of their obligations. This situation creates an imbalance that contradicts the principles of justice and legal certainty as mandated by Article 28D paragraph (1) of the 1945 Constitution. If this legal vacuum is allowed to persist, it will worsen the professional climate for notaries in Indonesia and potentially reduce the quality of legal services provided to the public. Legal norms that are not firm will eventually lose their binding power, and this is dangerous for the stability of the national legal system.

Theoretical Analysis and Solutions for Filling Legal Gaps

The theory of legal certainty serves as the primary basis for assessing the normative weaknesses contained in Article 84 of the Notary Law. Hans Kelsen emphasized that good law must meet the principle of *lex certa*, namely, clarity and certainty of norms for consistent application. Provisions that do not stipulate a maximum limit for compensation liability for notaries indicate that the norm does not provide clear direction for law enforcement and the parties involved. This uncertainty can lead to inequality in the application of sanctions, as

each judge can interpret the amount of compensation differently without objective guidelines. The lack of legal certainty also exposes the notary profession to legal risks that are difficult to anticipate, thus reducing a sense of security in carrying out their duties.

The theory of legal protection, as proposed by Philipus M. Hadjon, emphasizes the importance of balanced protection between the public and public officials. Legal protection should not favor only one party, as this would disrupt the harmony of the legal system. In the position of a notary, the public requires assurances that their rights are not violated due to official negligence, while notaries require protection to prevent excessive responsibilities. The absence of a maximum limit on compensation in Article 84 of the UUJN could create unequal protection, where notaries bear risks disproportionate to their fault. This theory emphasizes that a balance between rights and obligations must be maintained to create a just and sustainable notarial system.

The theory of justice, put forward by Aristotle and developed by John Rawls, teaches that justice is giving everyone their due and proportional compensation based on their actions. Substantive justice demands that legal liability not be imposed uniformly but rather be adjusted according to the degree of fault and the consequences. In the case of notaries, imposing compensation without a nominal limit creates the potential for injustice because it does not consider the degree of negligence. Minor administrative actions can result in claims for very large compensation amounts. The theory of justice provides a philosophical basis for regulating the liability limitation so that sanctions imposed align with the principles of proportionality and legal morality.

The Dutch legal system can serve as a reference in restructuring the regulation of notarial liability in Indonesia. The country has a mechanism that establishes liability limitations through a professional insurance system that is mandatory for every notary. This insurance guarantees compensation payments to the injured party without burdening the notary personally beyond a certain limit. This arrangement is strictly regulated through national notarial regulations, which ensure that legal protection applies equally to both parties. This model provides legal certainty, protects the profession, and maintains the credibility of notarial institutions in the public eye.

Germany also applies a limited liability approach to the notarial profession. This provision stipulates the maximum amount of liability that can be imposed, along with the obligation for notaries to have financial security or a professional insurance policy. This system prevents excessive claims against notaries who commit negligence without intent. This regulation ensures that notaries' liability is measurable and predictable, while the injured party still receives fair compensation. The German legal approach demonstrates that professional protection does not conflict with justice but strengthens the legal balance.

France also provides an example of a balanced practice between professional responsibility and legal protection for notaries. This country implements a collective fund mechanism managed by the notary association, which serves as insurance for losses arising from the negligence of its members. This system allows for compensation settlements without the need for lengthy litigation, while simultaneously safeguarding the reputation of the notary profession. Detailed regulations regarding the types of errors and the extent of liability make law enforcement more consistent and efficient. Lessons from France demonstrate the important role of professional organizations in maintaining accountability while protecting their members.

Revision of Article 84 of the Notary Law is a necessary first step to address this legal gap. This revision should include provisions regarding the maximum limit of notary liability for administrative and substantive negligence. This limit is not intended to absolve notaries from responsibility, but rather to ensure proportionality between the severity of the fault and its legal consequences. Clearer regulations will facilitate judges' determination of

compensation and provide a sense of security for notaries in carrying out their duties. This clarity will strengthen the principle of legal certainty and prevent the notary profession from undue criminalization.

The establishment of implementing regulations in the form of a Regulation of the Minister of Law and Human Rights could be a complementary solution following the revision of the law. This regulation could detail the mechanism for calculating compensation, the assessment agency, and the procedures for out-of-court settlement. The existence of technical guidelines would provide clarity for law enforcement officials, notaries, and the public in the event of disputes. This regulation could also classify notary misconduct into minor, moderate, and serious categories, facilitating the determination of appropriate liability. This approach not only increases the effectiveness of the law but also fosters public trust in the national notary system.

The implementation of a notary professional insurance system is a realistic alternative to addressing the issue of financial liability due to negligence. This scheme allows the risk of loss to be transferred to an insurance company that has partnered with a notary professional organization. Notaries pay regular premiums, and when a claim for compensation arises, the insurance company covers some or all of the costs in accordance with applicable regulations. This system protects notaries while ensuring the fulfillment of the rights of the injured party. In this way, the law can function not only as an instrument of punishment but also as a system of equitable protection.

The role of the Notary Supervisory Council (MPD, MPW, and MPP) also needs to be strengthened to have broader authority to recommend limits of liability based on the results of ethical and administrative examinations. This council can act as an assessment body, providing professional advice before cases proceed to court. The existence of an active supervisory council will help prevent the criminalization of notaries due to administrative errors that have no significant impact. By providing objective and proportional considerations, the council can act as an initial filter, maintaining a balance between disciplinary enforcement and professional protection. This approach will strengthen the national notary system, based on accountability and legal justice.

Restructuring Article 84 of the Notary Law and its supporting instruments will create a fairer and more measurable system of professional responsibility. Notaries can work with a sense of security without compromising their obligation to act prudently, while the public remains protected from potential losses due to negligence. Integrating legal theory, international comparative practice, and national policy will create a legal framework responsive to the needs of the times. This reformulation of responsibility also strengthens the position of notaries as guardians of legality with integrity, justice, and public trust. Thus, the legal vacuum that has created uncertainty can be transformed into an opportunity to strengthen the foundations of notary law in Indonesia.

CONCLUSION

Article 84 of the Notary Law provides the legal basis for imposing compensation sanctions on notaries who are negligent in carrying out their duties but does not stipulate a maximum liability limit that can be imposed. This normative situation creates a legal vacuum that seriously impacts the principles of certainty and justice, as there is no definitive measure for judges to determine the number of damages. This ambiguity can lead to an imbalance in protection between notaries as public officials and the public as users of legal services. When liability is not limited, the potential for abuse of legal claims increases, while notaries risk experiencing financial losses disproportionate to the degree of negligence. This situation demonstrates that existing regulations do not reflect the principles of prudence and substantive justice as mandated by the theory of legal certainty and legal protection.

Reformulation of Article 84 of the Notary Law is urgently needed to ensure that liability for compensation has a proportional limit. The government, together with the House of Representatives (DPR), needs to revise the law to establish explicit provisions regarding the maximum limit of notary liability, along with a mechanism for calculating and classifying levels of negligence. The Notary Supervisory Board, along with the Indonesian Notaries Association (INI), should develop more measurable ethical and administrative guidelines regarding professional responsibility to prevent an imbalance between public interest and professional protection. Implementing a mandatory professional insurance system for notaries is also an important step to shift the financial burden of negligence to collective protection mechanisms. Strengthening these regulations and protections will create a fairer, more certain, and more sustainable legal system for the notary profession in Indonesia.

REFERENCE

- Abdul, H. (2022). Tanggung Jawab Notaris Dalam Menjaga Minuta Akta. *FENOMENA*, 20(2), 184-197.
- Afriana, A. (2020). Kedudukan Dan Tanggung Jawab Notaris Sebagai Pihak Dalam Penyelesaian Sengketa Perdata Di Indonesia Terkait Akta Yang Dibuatnya. *Jurnal Poros Hukum Padjadjaran*, 1(2), 246-261.
- Anwary, I. (2025). Kekuatan Pembuktian Akta Otentik yang Mengalami Penurunan Status Menjadi Akta di Bawah Tangan. *Jurnal ISO: Jurnal Ilmu Sosial, Politik dan Humaniora*, 5(1), 9.
- Asufie, K. N., & Impron, A. (2021). Perlindungan hukum terhadap notaris dalam pelaksanaan jabatan notaris berdasarkan teori keseimbangan berbasis keadilan. *Journal of Law, Society, and Islamic Civilization*, 9(2), 37.
- Atikah, I. S. (2023). Yurisprudensi sebagai Upaya Koreksi terhadap Kekosongan dan Kelemahan Undang-Undang. *YUDHISTIRA: Jurnal Yurisprudensi, Hukum dan Peradilan*, 1(2), 61-69.
- Aulia, N., & Nabilah, N. R. (2025). Analisis Yuridis Tanggung Jawab Notaris Terhadap Isi Dan Kebenaran Data Dalam Akta Autentik. *Indonesian Journal of Islamic Jurisprudence, Economic and Legal Theory*, 3(2), 1666-1679.
- Cahayani, D. (2024). Kewenangan Notaris Dalam Pembuatan Akta Otentik Berdasarkan Undang-Undang Nomor 2 Tahun 2014 Tentang Jabatan Notaris. *Jurnal Pendidikan Dasar dan Sosial Humaniora*, 3(10), 853-860.
- Farhana, W. A. (2024). Peran Notaris dalam Keabsahan Akta untuk Meminimalisasi Sengketa Tanah. *Prosiding Seminar Nasional Hukum, Kebijakan Publik, Hak Asasi Manusia dan Keadilan*, 3, 1-9.
- Febrianty, Y. (2023). *Keberadaan Hukum Kenotariatan di Indonesia*. Cirebon: CV Green Publisher Indonesia.
- Ghani, A. R., Firdaus, M., & Al Ansari, M. (2025). Peran Notaris Dalam Pembuatan Akta Otentik Dan Dampaknya Terhadap Keabsahan Hukum Di Indonesia. *Indonesian Journal of Islamic Jurisprudence, Economic and Legal Theory*, 3(2), 1574-1582.
- Imani, A. M., & Basoeky, U. (2025). PERAN KESADARAN ETIKA GUNA MENINGKATKAN KUALITAS PROFESI NOTARIS DALAM UPAYA PENEGAKAN HUKUM. *Suloh: Jurnal Fakultas Hukum Universitas Malikussaleh*, 13(1), 259-275.
- Jasmine, M., Otich, D., Setiawan, R. W., & Mufid, M. (2025). Konsep Dan Tipe Keadilan Dalam Pemikiran Aristoteles. *Nusantara: Jurnal Pendidikan, Seni, Sains dan Sosial Humaniora*, 3(01).
- Laritmas, S., & Rosidi, A. (2024). *Teori-teori Negara Hukum*. Jakarta: Prenada Media.

- Lubis, M. F., & Noor, T. (2022). Kelalaian Notaris Dalam Pembuatan Akta Autentik Berdasarkan Putusan Mahkamah Agung RI Nomor 2604 K/Pdt/2019. *Jurnal Hukum Samudra Keadilan*, 17(1), 70-82.
- Maharani, I. (2022). Peran notaris dalam membuat akta hukum sesuai dengan Undang-Undang Jabatan Notaris berdasarkan teori kemanfaatan. *Jurnal Multidisiplin Indonesia*, 1(3), 962-969.
- Ramadhan, I. (2024). Analisis Terkait Akta Otentik Sebagai Alat Bukti Dalam Perkara Hukum Perdata. *Al-Dalil: Jurnal Ilmu Sosial, Politik, Dan Hukum*, 2(3), 32-37.
- Rizki, M. I. (2025). Kewenangan dan Pertanggungjawaban Notaris dalam Proses Pembentukan Perseroan Terbatas. *Jurnal Hukum, Politik dan Ilmu Sosial*, 4(3), 26-36.
- Sinaga, R. I. (2022). Kekuatan Pembuktian Akta Di Bawah Tangan Menurut Hukum Perdata. *Lex Privatum*, 10(5).
- Suci, N. T., & Sawitri, D. A. (2025). PERTANGGUNGJAWABAN HUKUM NOTARIS ATAS KELALAIAN DALAM VERIFIKASI STATUS TANAH SENGKETA PADA PROSES JUAL BELI TANAH. *Jurnal Media Akademik (JMA)*, 3(10).
- Suparidho, F., & Umami, A. M. (2025). Tanggung Jawab Perdata Notaris Terhadap Akta yang Dibuatnya. *Jurnal Kolaboratif Sains*, 8(6), 2727-2730.
- Suwardiyati, R., & Rustam, R. (2022). Urgensi Reformulasi Pengaturan Penyerahan Protokol Notaris untuk Mewujudkan Kepastian Hukum. *Peradaban Journal of Law and Society*, 1(2), 119-132.
- Wibowo, W. S., Najwan, J., & Bakar, F. A. (2022). Integritas Notaris Sebagai Pejabat Pembuat Akta Autentik dalam Undang-Undang Jabatan Notaris. *Recital Review*, 4(2), 323-352.
- Wijaya, V. C., Afriana, A., & Baraba, B. (2023). Perlindungan Hukum Secara Keperdataan Bagi Klien Notaris Yang Mengalami Kerugian Akibat Diterbitkannya Akta Autentik Yang Cacat Hukum Oleh Notaris. *Acta Diurnal Jurnal Ilmu Hukum Kenotariatan*, 7(1), 15-30.