



# Reconstruction of The Regulations on Verification of The Applicant's Identity by Notaries in The Preparation of Authentic Deeds to Address The Legal Void Regarding The Use of Fake Identities

Kartika\*, Rineke Sara

Universitas Borobudur, Indonesia

Email: kartika.ppat@gmail.com\*, rineke\_sara@borobudur.ac.id

---

## Keywords:

Identity Verification;  
Notary;  
Authentic Deed

---

## Abstract

The purpose of this study is to investigate the legal loopholes concerning the use of false identities in Indonesian notarial practice, as well as the legal provisions governing a notary's verification of an appearer's identity in the preparation of an authentic deed. Notaries are public officials authorized to prepare authentic deeds with perfect evidentiary force, as stated in Articles 1868 and 1870 of the Civil Code. In practice, verification of the appearer's identity is a crucial aspect of ensuring the validity of a deed and providing legal certainty for the parties. However, the provisions concerning the identity verification mechanism under Law Number 2 of 2014 concerning the Position of Notary remain general in nature and do not regulate in detail the standard procedures for verifying an appearer's identity, thereby potentially leading to identity misuse, such as the use of false identities or identities belonging to other persons in the preparation of deeds. This study analyzes laws and regulations, legal theory, and relevant literature using a normative juridical legal research method with statutory and conceptual approaches. The results of the study indicate a legal gap in the mechanism for verifying an appearer's identity by a notary, which has the potential to create legal uncertainty and the risk of legal liability for notaries. Therefore, a more comprehensive reconstruction of legal regulations is needed by strengthening identity verification obligations, developing standard verification procedures, and utilizing the national population administration system to ensure the authenticity of the parties' identities in the preparation of authentic deeds, thereby increasing legal certainty and legal protection in notarial practice.

---

## INTRODUCTION

Notaries occupy a significant position within the Indonesian civil law system because they serve as public officials authorized to prepare authentic deeds with perfect evidentiary force (Nurrachmasari, 2023). This authority is emphasized in Article 1, Number 1 of Law Number 2 of 2014 concerning Amendments to Law Number 30 of 2004 concerning the Position of Notaries, which states that a notary is a public official authorized to prepare authentic deeds and exercise other powers as provided by law (Arben, 2024). Furthermore, authentic deeds hold a particularly strong position within the civil law evidentiary system because Article 1868 of the Civil Code defines an authentic deed as one prepared in the form

prescribed by law by, or before, a public official authorized for that purpose at the place where the deed is executed (Faulina, 2022). The evidentiary strength of an authentic deed is further confirmed by Article 1870 of the Civil Code, which provides that an authentic deed constitutes perfect evidence for the parties and their successors regarding the matters contained therein (Afriana, 2020). Therefore, a notarial deed functions not only as written evidence but also as an instrument for ensuring legal certainty, legal order, and legal protection in various civil legal relationships (Husain & Lahae, 2022; Nadya, 2026; Novitri et al., n.d.; Randomis, 2025; Samosir et al., 2026; Sari et al., 2025).

The presence and identity of the parties appearing before a notary are fundamental elements in the preparation of an authentic deed because the deed essentially records the parties' legal intent (Siahaan, 2019). The Law on the Position of Notaries expressly regulates the obligation of notaries to verify the identity of the appearers. Article 16, paragraph (1), letter a of Law Number 2 of 2014 requires notaries to act in a trustworthy, honest, thorough, independent, and impartial manner while safeguarding the interests of the parties involved in legal acts. In addition, Article 16, paragraph (1), letter c requires notaries, as part of the notarial administration, to attach the supporting documents and fingerprints of the appearers to the original deed (*minuta deed*) (Farahianie, 2024). In notarial practice, this obligation is closely associated with the principle of prudence, ensuring that the deed accurately reflects the true identities and intentions of the parties (Ghani, 2025). Moreover, as stipulated in Article 1320 of the Civil Code, which requires the consent of legally competent parties to establish a valid agreement, the proper identification of the parties directly affects whether the legal requirements of an agreement have been fulfilled. Consequently, verifying the identities of the parties is essential to establishing the validity of an authentic deed (Wiryawan, 2025).

However, in notarial practice, the misuse of identities during the preparation of deeds frequently occurs, either through the use of false identities or by using another person's identity without that person's knowledge. Such misuse often involves forged population documents, including falsified Resident Identity Cards, or the unauthorized use of another person's identity to conduct certain legal transactions (Ivany, 2023). Such conduct constitutes a criminal offense under Article 263 of the Criminal Code concerning document forgery and is also related to the provisions of Law Number 24 of 2013 concerning Population Administration, which governs the validity and use of population data. Within notarial practice, the use of false identities may result in serious legal consequences, including disputes over the validity of deeds, the annulment of agreements, and financial or legal losses suffered by parties acting in good faith (Faizal, 2024). This situation demonstrates that verifying the identity of the appearer is a significant legal issue that directly affects the validity of authentic deeds.

This issue becomes even more complex because the Law on the Position of Notaries does not specifically regulate the mechanism for verifying the identity of the appearer. Law Number 2 of 2014 merely requires that the appearer be personally known to the notary or be introduced by two identifying witnesses, as stipulated in Article 39 (Apriana, 2023). However, this provision does not establish clear standards or procedures for identity verification, particularly in light of technological developments and the increasing sophistication of document forgery. Meanwhile, legislation governing population

administration has established a national population database through the Population Identification Number (Nomor Induk Kependudukan (NIK)), as provided in Article 13 of Law Number 24 of 2013 concerning Population Administration. Nevertheless, the integration of this system into notarial practice has not been comprehensively regulated under the legislation governing the office of notaries (Larashati, 2025).

The absence of clear regulations concerning the mechanism for verifying the identity of the appearer reflects a legal vacuum within the Indonesian notarial legal system. This legal vacuum is demonstrated by the lack of standardized procedures specifying the measures that notaries must undertake to verify the authenticity of an appearer's identity, including the use of information technology or access to the national population database. Consequently, identity verification in the preparation of authentic deeds continues to rely largely on the discretion of individual notaries and lacks uniform standards. This situation may create legal uncertainty if it is subsequently established that the identity used in the preparation of the deed was false or forged. In such circumstances, an authentic deed, despite its inherent perfect evidentiary force, may lose its evidentiary value and potentially expose the notary to legal liability under Article 1365 of the Civil Code concerning unlawful acts (Zulfikar, 2025).

This regulatory gap ultimately undermines legal certainty and legal protection for parties utilizing notarial services. If the identity of the appearer is not properly verified, the resulting deed may be legally defective and give rise to future disputes. Furthermore, notaries, as public officials, may also face civil, administrative, or ethical liability if they are found to have been negligent in fulfilling their duty of care under Article 16 of the Law on the Position of Notaries. Therefore, it is necessary to reconstruct the regulations governing the mechanism for verifying the identity of the appearer in the preparation of authentic deeds so that they become more comprehensive and responsive to technological developments and the national population administration system. Such regulatory reconstruction is expected to strengthen legal certainty, enhance legal protection for the parties, and maintain public confidence in authentic deeds prepared by notaries as public officials who perform essential functions within Indonesia's civil law system.

## **METHOD**

This study used a normative juridical legal research method by examining legal norms, doctrines, and regulations relevant to notaries' authority and responsibility to verify the identity of appearers in the preparation of authentic deeds. The study relied on primary legal materials, including the Civil Code, Law Number 2 of 2014 concerning Amendments to Law Number 30 of 2004 concerning the Position of Notaries, and Law Number 24 of 2013 concerning Population Administration. Secondary legal materials were obtained from books, scientific journals, and expert opinions on notarial law, legal certainty, and legal protection. The research applied statutory and conceptual approaches to identify inconsistencies and legal gaps in the regulation of identity verification mechanisms. Through these approaches, the study formulated a reconstruction of legal regulations to strengthen identity verification in the preparation of authentic deeds.

## **RESULTS AND DISCUSSION**

### **Legal Regulations Concerning Verification of the Applicant's Identity in the Preparation of Authentic Deeds by Notaries**

The notary's role as a public official authorized by the state to provide written evidence with full evidentiary power is fundamentally linked to the legislative restrictions for the authentication of the applicant's identification in the preparation of legitimate deeds. This position is supported by Article 1, number 1 of Law Number 2 of 2014 concerning Amendments to Law Number 30 of 2004 respecting the Position of Notaries, which states that a notary is a public official competent to create valid documents and has other obligations as stipulated by law. In accordance with Civil Code Article 1868, "an authentic deed is a deed drawn up in the form stipulated by law by or before an authorized public official at the location where the deed is made up." As a result, authentic deeds have a very strong position as evidence in the Indonesian civil law system. Article 1870 of the Civil Code, which stipulates that an authentic deed gives the parties and their successors complete proof of what is contained therein, further highlights the evidentiary value of an authentic deed. Because these identities serve as the foundation for the legal relationship documented in the deed, a notary must make sure that the identities of the parties appearing before him are accurate and match the real circumstances while preparing an authentic deed.

The Notary Law specifies a variety of requirements that notaries must meet in order to exercise this authority and create genuine deeds. One of these responsibilities is outlined in Law Number 2 of 2014's Article 16, paragraph (1) letter a, which mandates that notaries work with integrity, honesty, thoroughness, independence, impartiality, and protect the interests of the parties involved in legal acts. This clause suggests that notaries must carefully and cautiously confirm the parties' identities before representing their preferences in the genuine deed. In addition, Article 16 paragraph (1) letter c of the Notary Law also stipulates that notaries are required to attach documents and fingerprints of the person appearing to the minutes of the deed as part of notarial administration. This provision indicates that the identity of the person appearing is not only stated formally in the deed but must also be supported by legally verifiable identity documents.

More specific provisions regarding the identity of the person appearing in the preparation of an authentic deed can be found in Article 39 of Law Number 2 of 2014, which stipulates that the person appearing must be known to the notary or introduced to him by two identifying witnesses who meet the requirements as stipulated in the law. This condition is a legal mechanism designed to ensure that the person appearing before the notary is truly the party carrying out the legal act set forth in the deed. These identifying witnesses must have legal capacity and can provide assurance regarding the identity of the person appearing to the notary. With this identification mechanism, it is hoped that the notary can obtain certainty regarding the identity of the parties before the deed is prepared and signed. This provision is also closely related to the provisions regarding witnesses in the preparation of deeds, as stipulated in Article 40 of the Notary Law, which mandates that a minimum of two witnesses who satisfy the legal criteria attend the creation of a deed.

In addition to being regulated in the Notary Law, verification of the appearing party's identity is also related to the national population administration system, as stipulated in Law Number 24 of 2013 concerning Amendments to Law Number 23 of 2006 concerning

Population Administration. Article 13 of this law stipulates that each resident has only one Population Identification Number, which is valid for life and serves as a single identity for each citizen. This Population Identification Number is listed on population documents, such as the electronic Population Identity Card (Kartu Tanda Penduduk), which serves as official proof of identity recognized by the state. The existence of this population administration system essentially provides a legal basis for notaries to use population documents as the primary means of verifying the appearing party's identity. Thus, the identity listed in the population document can be used as a reference to ensure that the party appearing before the notary is truly a legitimate legal subject and has the authority to carry out the legal act in question.

In civil law, the conditions for a valid agreement are intimately linked to the verification of the parties' identities. According to Article 1320 of the Civil Code, an agreement is deemed valid if it satisfies four criteria: the parties' agreement, their ability to enter into an agreement, the existence of a specific object, and a legitimate cause. In this context, the identity of the parties is crucial for fulfilling the elements of agreement and capacity to perform legal acts. If the identity used in the deed is proven to be false or inconsistent with the actual circumstances, this can impact the validity of the agreement made before a notary. In certain circumstances, the agreement can even be declared void or annulled due to failure to meet the subjective requirements stipulated in Article 1320 of the Civil Code. Therefore, verification of the identity of the parties by a notary is a crucial step in ensuring that the legal acts outlined in the deed were actually carried out by the authorized party.

Based on these various provisions, it can be understood that the legal provisions regarding the verification of the identity of the person appearing in the preparation of an authentic deed actually have a normative basis in various laws and regulations, both in the Notary Public Law, the Civil Code, and the Population Administration Law. However, these provisions are basically still general in nature and do not regulate in detail the procedures or standards for identity verification that must be carried out by notaries in notarial practice. Existing provisions emphasize the notary's obligation to know the person appearing or introduce the person appearing through an identifying witness without providing technical guidelines regarding how the identity verification process must be carried out systematically and responsibly. This condition indicates that although the legal basis regarding the identity of the person appearing has been governed by a number of laws and regulations, a more thorough regulation is still required to guarantee that the verification of the individual appearing in the preparation of an authentic deed can offer the parties the best possible legal certainty and preserve the integrity of the notarial deed as evidence with perfect evidentiary power.

### **Legal Deficiencies in the Notary's Identity Verification Mechanism for the Use of False Identities**

The legal deficiencies in the notary's identity verification mechanism for the use of false identities are a significant issue in notarial practice in Indonesia. It relates to the status of authentic deeds as evidence with absolute evidentiary force under civil law, according to Article 1868 of the Civil Code, which defines an authentic deed as one that is prepared in a manner specified by law by or in front of an authorized public authority. Additionally, Article 1870 of the Civil Code highlights that an authentic deed gives the parties and their successors

unquestionable proof of its contents. This strong evidentiary force requires assurance that the identities of the parties stated in the deed accurately reflect the actual circumstances. However, in notarial practice, issues often arise where false identities or the identities of others are used in the preparation of authentic deeds, raising doubts about the validity of the deed and giving rise to future legal disputes. This problem is inseparable from the limited provisions in the Notary Law, which do not yet provide detailed provisions regarding the identity verification mechanism for the notary. As stated in Article 16 paragraph (1) letter an of Law Number 2 of 2014 concerning Amendments to Law Number 30 of 2004 concerning the Notary Law, notaries are required to behave with integrity, honesty, diligence, and impartiality. This provision implicitly requires notaries to exercise caution in verifying the identities of the parties appearing before them. Furthermore, Article 39 of the Notary Law also stipulates that the notary must recognize the notary or be introduced by two identifying witnesses who meet the requirements stipulated by law. However, this provision does not provide clear guidelines regarding the identity verification procedures that must be carried out by notaries, so its implementation is highly dependent on the subjective judgment and prudence of each notary.

The absence of more detailed regulations regarding identity verification standards opens up the opportunity for identity misuse in the preparation of authentic deeds. In practice, certain parties exploit weaknesses in the identity verification system, including the use of fake ID cards, the use of another person's identity without their knowledge, and the falsification of other supporting documents. These acts are essentially criminal offenses as stipulated in Article 263 of the Criminal Code, which regulates document forgery. However, in the context of notarial law, the use of false identities not only raises criminal charges but also has legal implications for the validity of the deed. If the identity used in the deed is proven to be false, the deed's validity can be challenged and even potentially give rise to lawsuits from the aggrieved party.

Furthermore, the legal gap in the identity verification mechanism for applicants is also related to the suboptimal utilization of the population administration system in notarial practice. Law Number 24 of 2013 concerning Population Administration stipulates that every resident has a unique, lifelong Population Identification Number (NIC), as stipulated in Article 13. This NIC serves as the sole identity document listed on population documents such as electronic ID cards. However, to date, there are no explicit regulations governing the access mechanism or integration between notaries and the national population data system for direct identity verification. As a result, in many cases, notaries rely solely on physical documents presented by the parties without being able to directly verify the authenticity of the data contained therein.

This lack of regulation also has implications for notaries' legal liability in the event of identity misuse when drafting deeds. In practice, questions often arise regarding the extent to which notaries can be held liable if the deeds they draft are based on false identities. The Notary Law essentially only regulates the notary's obligation to act carefully and cautiously, but does not provide clear definitions regarding the standards of care that must be met by notaries in verifying the identity of the person appearing before them. On the other hand, if a notary is deemed negligent in carrying out their duties, they are potentially liable for civil liability under Article 1365 of the Civil Code concerning unlawful acts. This situation

demonstrates that the unclear regulations regarding the verification of the identity of the person appearing not only pose risks for the parties but also create legal uncertainty for notaries in carrying out their duties.

Therefore, it can be concluded that the mechanism for verifying the identity of the person appearing in the preparation of authentic deeds still faces a regulatory gap in the Indonesian notarial legal system. Although various provisions in the Notary Law, the Civil Code, and the Population Administration Law provide a legal basis for the identity and duty of care of notaries, there is no comprehensive regulation governing the procedures and standards for identity verification that must be done by notaries. The legal gap may raise various problems, including the misuse of identity, disputes regarding the validity of deeds, and uncertainty regarding notaries' legal responsibilities. Therefore, it is necessary to update the regulations to be clearer and more systematic regarding the identity verification mechanism for the person appearing in the making of an authentic deed to provide legal certainty and increase legal protection for the parties in notarial practice.

### **Reconstruction of the Regulations on the Verification of the Applicant's Identity by Notaries in the Preparation of Authentic Deeds**

Reconstruction of the regulations regarding the verification of the applicant's identity by notaries in the preparation of authentic deeds is an important step to address the legal vacuum that has existed in notarial practice. It relates to the function of authentic deeds as evidence with perfect evidentiary force, as stipulated in Articles 1868 and 1870 of the Civil Code. The notary's position as a public official, as affirmed in Article 1, number 1 of Law Number 2 of 2014 concerning the Office of Notaries, also requires a high standard of care in ensuring that the identities of the parties stated in the deed truly reflect the actual circumstances. Therefore, the reconstruction of the regulations on the verification of the applicant's identity needs to be directed towards establishing a clearer, more measurable, and legally accountable system. This reconstruction aims not only to strengthen legal certainty for the parties but also to protect notaries in exercising their authority so that they are not easily blamed in the event of misuse of their identity by irresponsible parties.

One form of regulatory reconstruction that can be implemented is to clarify the norms in the Notary Law regarding the obligation to verify the identity of the person appearing. Currently, Article 39 of Law Number 2 of 2014 only stipulates that the person appearing must be known to the notary or introduced by two identifying witnesses, but does not yet specify the identity verification procedures that must be carried out by the notary. Therefore, additional regulations are needed that require notaries to conduct a more comprehensive examination of identity documents before a deed is drawn up. A concrete action that can be taken is to add provisions to the legislation requiring notaries to verify the authenticity of population documents, such as electronic ID cards, family cards, or other official identity documents, and to match them with the data submitted by the parties. This examination must be recorded in the minutes of the deed as part of notarial administration, so that it can serve as evidence that the notary has fulfilled the duty of care as stipulated in Article 16, paragraph (1), letter a of the Notary Law.

Regulatory reconstruction also needs to be directed at the use of information technology in the identity verification process of the person appearing. In Indonesia's population administration system, every resident is assigned a unique, lifelong Population Identification

Number (Identification Number), as stipulated in Article 13 of Law Number 24 of 2013 concerning Population Administration. This population data system can be utilized as a means for more accurate identity verification. Therefore, one concrete action that can be taken is to establish an integration mechanism between the notary system and the national population administration database so that notaries can directly verify the authenticity of the identity data of those appearing. Through this system, notaries can ensure that the Identification Number used is truly registered and matches the identity stated in population documents, thereby minimizing the potential for the use of false identities.

In addition to utilizing information technology, regulatory reconstruction also needs to be accompanied by the establishment of clear standard operating procedures for notaries in verifying the identity of those appearing. These standard procedures can be outlined in implementing regulations or technical guidelines that govern the steps notaries must take before drafting a deed. Concrete actions that can be taken include requiring notaries to match identity documents with the physical data of the person appearing, providing documentation in the form of scans or copies of identity documents, and requiring the taking of fingerprints or other biometric signs as regulated in Article 16 paragraph (1) letter c of the Notary Law which requires notaries to attach documents and fingerprints of the person appearing to the minutes of the deed. With clear procedural standards, the identity verification process can be carried out more systematically and uniformly by all notaries.

Regulatory reform should also include strengthening the oversight system for notaries' implementation of identity verification obligations. Supervision of notaries is essentially regulated in the Notary Law through the Notary Supervisory Board mechanism. However, this oversight needs to be strengthened by incorporating identity verification as an indicator of notary compliance in conducting their duties. Concrete actions that can be taken include requiring notaries to document the entire identity verification process for the person appearing in the notary's archives or protocols so that they can be reviewed by the Supervisory Board if necessary. Furthermore, regular guidance and training are needed for notaries on identity verification techniques and developments in document forgery methods so that notaries have sufficient skills to detect potential identity misuse.

This regulatory reform is expected to create a more effective identity verification system for notary practice in Indonesia. Clearer regulations regarding identity verification procedures, the use of information technology, and a strengthened oversight system will provide greater legal certainty for parties using notary services. Furthermore, this reconstruction will strengthen legal protection for notaries in exercising their authority as public officials, as stipulated in the Notary Law. Ultimately, a more comprehensive and integrated identity verification system will help maintain the integrity of authentic deeds as evidence that has perfect evidentiary power and increase public trust in notary institutions in the Indonesian legal system.

## **CONCLUSION**

Based on the findings of this study, it can be concluded that the Indonesian notarial legal system has established a normative framework governing a notary's obligation to verify the identity of the appearers in the preparation of authentic deeds. These provisions are reflected in Article 1, Number 1, Article 16, paragraph (1), and Article 39 of Law Number 2

of 2014 concerning the Position of Notaries, which regulate the authority of notaries, their obligation to perform their duties with prudence and integrity, and the requirement that an appearer must either be personally known to the notary or be introduced by identifying witnesses. In addition, Articles 1868 and 1870 of the Civil Code establish the legal status of an authentic deed as evidence possessing perfect evidentiary force, demonstrating that the identity of the parties is a fundamental element in ensuring legal certainty in legal acts embodied in the deed. However, these provisions remain general in nature and do not establish detailed procedures or standards for verifying the identity of the appearer. Consequently, this regulatory gap creates a legal vacuum that may facilitate identity misuse, including the use of false identities or the unauthorized use of another person's identity in the preparation of authentic deeds, thereby increasing the risk of legal disputes and prejudice to the parties involved.

Based on these findings, legal reform is necessary through the reconstruction of regulations governing the mechanism for verifying the identity of appearers in the preparation of authentic deeds. This objective may be achieved by strengthening the provisions of the Law on the Position of Notaries or by issuing implementing regulations that establish clear and standardized identity verification procedures to be followed before the preparation of a deed. Furthermore, the notarial system should be integrated with the national population administration system established under Law Number 24 of 2013 concerning Population Administration, enabling notaries to verify identities using valid and reliable population data. In addition, standardized operating procedures should be developed to guide notaries in examining identity documents, verifying population data, and documenting the identity verification process as part of the notarial protocol. Such comprehensive and systematic regulatory reforms are expected to establish a more effective identity verification mechanism, strengthen legal certainty, enhance legal protection for the parties, and preserve the integrity of authentic deeds as legal instruments possessing perfect evidentiary force within Indonesia's civil law system.

## REFERENCES

- 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.
- Apriana, N. (2023). Kedudukan premisse dalam anatomi akta notaris. *Officium Notarium*, 3(1), 49–58.
- Arben, A., & Arifin, A. (2024). Kedudukan akta notaris sebagai akta autentik dalam hukum perdata berdasarkan Undang-Undang Jabatan Notaris. *ANDREW Law Journal*, 1(1), 1–11.
- Faizal, H., & Ahmad, A. (2024). Kedudukan notaris sebagai mediator dalam penyelesaian sengketa kenotariatan. *Jurnal Pendidikan dan Ilmu Sosial (JUPENDIS)*, 2(3), 307–317.
- Farahianie, S. (2024). Kedudukan hukum akta autentik yang dibuat oleh notaris dalam perspektif cyber notary. *Acten Journal Law Review*, 2(2), 173–188.
- Faulina, J. A. (2022). Kedudukan hukum akta notaris yang menerapkan konsep cyber notary di masa pandemi COVID-19 di Indonesia. *Notary Law Journal*, 1(2), 247–262.
- Ghani, A. R. (2025). Peran notaris dalam pembuatan akta otentik dan dampaknya terhadap keabsahan hukum di Indonesia. *Indonesian Journal of Islamic Jurisprudence, Economic and Legal Theory*, 3(4), 1574–1582.

- Husain, H., & Lahae, K. (2022). Making a notary deed that provides legal certainty. *Awang Long Law Review*, 5(1), 180–188.
- Ivany, N. N. (2023). Kedudukan akta notaris yang penghadapnya memiliki hubungan keluarga dengan notaris. *Perspektif: Kajian Masalah Hukum dan Pembangunan*, 28(2), 130–140.
- Larashati, D. A. (2025). Analisis kedudukan hukum notaris dan perlindungan hukum terhadap akta yang dibatalkan oleh putusan pengadilan. *Ranah Research: Journal of Multidisciplinary Research and Development*, 7(3), 889–896.
- Nadya, S. A. (2026). The validity of credit agreement deeds non-compliant with the law on the office of notaries: A review from the perspective of legal certainty and accountability. *Al-Qanun: Jurnal Kajian Sosial dan Hukum Islam*, 7(1), 41–51.
- Novitri, E., Santoso, B., & Ruslina, E. (n.d.). Legal liability of notaries for formal defects in deeds of guarantee as instruments of evidence in the resolution of financing disputes: An analysis based on the theory of evidence and the theory of legal responsibility. *Melayunesia Law*, 10(1), 33–53.
- Nurrachmasari, A., & Arifin, A. (2023). Kedudukan hukum terhadap covernote notaris dalam pencairan kredit. *JHIP: Jurnal Ilmiah Ilmu Pendidikan*, 6(7), 5542–5550.
- Randomis, A. N. (2025). Regulation of legal protection for notaries in performing official duties to ensure legal certainty and justice. *Interdisciplinary Journal and Humanity (INJURITY)*, 4(11), 969–975.
- Samosir, T., Sihombing, B. F., & Listina, N. (2026). Legal implications and responsibilities of notaries for forgery of sale and purchase agreement deeds by notaries. *Journal of Law, Politic and Humanities*, 6(3), 1872–1885.
- Sari, R. M. P., PP, A. I., Lumingkewas, C. S., & Mariani, M. (2025). The role of notaries in civil agreements legality and validity of deeds. *Jurnal Hukum dan Keadilan*, 2(3), 13–27.
- Siahaan, K. (2019). Kedudukan hukum akta notaris sebagai alat bukti pada tindak pidana pemalsuan surat dalam proses peradilan pidana. *Recital Review*, 1(2), 72–88.
- Wiryanawan, W. F. (2025). Analisis yuridis terhadap dugaan pelanggaran notaris dalam UU Jabatan Notaris dan etika profesi. *Syntax Idea*, 7(5), 1184–1196.
- Zulfikar, A. I. (2025). Tantangan yuridis dan harmonisasi regulasi kedudukan akta notaris dalam pembuktian perjanjian elektronik di era digital Indonesia. *Lex Lectio Law Journal*, 1(1), 1–13.