



Analysis of the Partiality in Legal Counseling by Notaries During Extraordinary General Meetings of Shareholders Based on the Principle of Justice

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Abstract: One of the notary's authorities is to provide legal counseling, including in the context of the Extraordinary General Meeting of Shareholders (EGMS). This counseling is very important to ensure the legality of the legal process, especially in the preparation of deeds related to the transfer of shares and other important decisions. However, in practice, there are cases where notaries do not perform their duties independently, which ultimately leads to legal problems. As a country of law, Indonesia guarantees legal certainty and protection for every citizen. However, irregularities by less independent notaries, such as in the case of Notary Hartono in Gianyar Regency, highlight significant risks for the parties involved, including potential losses due to falsification of documents. This study aims to analyze the legal consequences of deeds produced by non-independent notaries. This study seeks to explore how non-compliance by notaries with this principle affects the validity of the deeds they produce. The method used in this study is a normative juridical approach that utilizes secondary data, with analysis carried out on relevant laws and regulations, documents, and literature related to the authority of notaries and the principle of justice. This research is descriptive-analytical, providing an overview of the consequences arising from the lack of independence in the duties of notaries, followed by analysis. The results of the study show that the lack of independence of notaries in providing legal counseling can cause legally defective deeds and potentially void them, resulting in losses for the affected parties. The case of Notary Hartono serves as a concrete example where violations of notary independence lead to forgery of deeds and significant legal repercussions. The principle of justice is not upheld if the notary does not act independently in carrying out his duties.

Keywords: Legal Counseling, Notary Independence, Principle of Justice.

1. Introduction

Indonesia as a country of law based on Pancasila and the 1945 Constitution of the Republic of Indonesia guarantees justice, certainty, and legal protection for every citizen (Rahmatullah, 2020). The concept of the State of Law means the recognition of the principle of the rule of law and the constitution, the existence of guarantees of human rights in the Constitution, the existence of the principle of a free and impartial judiciary that guarantees the equality of every citizen in the law, and guarantees justice for everyone, including against the abuse of authority by the authorities (Rahmatullah, 2020; Thahira, 2020).

Indonesian society as a legal society in carrying out its activities is mostly related to legal norms that are binding for everyone and their enactment can be enforced. According to Jimmly Ashiddique, this legal norm is binding for every citizen to obey (Ashiddique, 2020). According to Soerjono Soekanto, the creation of norms is so that relationships in a society can run as expected (Soekanto, 2014).

Legal awareness for the community creates a sense of compliance with applicable laws and regulations due to coercion or fear of sanctions. Legal compliance as a form of legal awareness forces people to carry out their various activities, mostly in accordance with legal compliance, such as paying taxes, obeying applicable laws, not committing

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criminal acts, having permits such as Driver's Licenses (SIM), business licenses, or other documents that require approval from certain parties for personal interests or the interests of the community (Syafrudin, 2000).

Community legal awareness is also the output of the process of legal counseling activities which is characterized by a sense of respect for the law, through practice in the field by means of legal counseling that is communicative and able to touch the conscience of the community to respect the law and raise legal awareness. Legal counseling is held with the aim of realizing better legal awareness of the community so that people are aware of their rights and obligations and realize a legal culture in attitudes and behaviors that are aware, obedient, obedient and respect human right (Syafrudin, 2000).

Considering that Indonesian people have different backgrounds, especially from the aspect of education, the understanding of the Indonesian people towards the law is also different, so efforts are needed to provide legal knowledge, one of which is through legal counseling. The legal counseling in question is not limited to simple legal activities or acts but also complex legal acts, such as during the General Meeting of Shareholders (hereinafter referred to as the GMS) (Wahono, 2022).

Regarding legal counseling at the time of the GMS, it can be carried out by a notary/PPAT and the company's legal team, but in general, it is carried out by a notary, considering that Law Number 2 of 2014 concerning the Notary Position has provisions in article 15 paragraph (2) letter e which reads "Notaries are authorized to provide legal counseling in connection with the making of related deeds" (Erlita Chita & Fajri Mekka Putra, 2023).

The importance of legal counseling by notaries is because it is not uncommon for the implementation of GMS to deviate from existing provisions and can affect the validity of the GMS (Rosdiana, 2021). As a noble profession, notaries should be independent and impartial and carry out their duties and authorities in accordance with the laws and regulations and the Ethics of the Notary Profession as referred to in the Notary Office Law Article 15 paragraph (2) letter e and the Notary Code of Ethics article 3.

However, in practice, it is found that there are notaries who are not independent and impartial, who actually commit acts that deviate from the Law and the Notary Professional Ethics so that authentic deeds can be declared null and void because they have the potential to cause disputes and harm several parties (Putra & Anand, 2018; Ulum, 2022; Yustica et al., 2020). As happened in the case that the author took as an example, is the phenomenon of notaries who are involved in the crime of Letter Forgery which began with legal counseling carried out in the Gianyar regency area, Bali. Hartono, S.H. a notary in Gianyar district deliberately provides advice or legal education that is not in accordance with laws and regulations and will cause losses to those who are entitled to (Fahrawi et al., 2022; Putra & Anand, 2018). In accordance with the decision of the Gianyar District Court Number 149/Pid.B/2019/PN. Gin stating that Notary Hartono, S.H. and his employees who committed, ordered to do, and who participated in committing acts, made false letters or forged letters that could create a right, covenant, or debt relief, or that were intended as evidence of a matter with the intention of using or instructing others to use the letter as if its contents were true and not false, and cause losses (Zulfikar & Basri, 2024).

This case began with a company in the property sector called PT. BALI RICH MANDIRI (hereinafter referred to as PT. BRM) was established on September 27, 2012 by Rudy Dharma (Director with 800 shares), Hendro Nugroho (President Commissioner with 100 vacant shares), and Djarius Haryanto (Commissioner with 100 shares). In May 2015, Rudy Dharma passed away, leaving Hartati as an heir. In June 2015, several parties (Suryadi, Asral, Tri Endang, and Hendro Nugroho) came to the office of Notary Hartono, S.H., regarding the sale of shares belonging to Hartati and Djarius without valid approval. The legal problem that occurred was that Notary Hartono, S.H. explained that the sale of shares could be carried out without the consent of Hartati and Djarius, which is contrary to Law Number 40 of 2007 (Novita Supono et al., 2024).

On December 21, 2015, it is alleged that the Extraordinary General Meeting of Shareholders (hereinafter referred to as EGMS) of PT. BRM, where the shares belonging to Rudy Dharma and Djarius were sold to other parties (Suryadi, Asral, Tri Endang), and the change of position at PT. BRM approved. Hartati and Djarius Haryanto testified that they never attended the EGMS and never sold shares to anyone. On October 24, 2017, the National Police Forensic Laboratory Center found that Hartati's signatures on the documents for the sale of shares and the minutes of the EGMS were fake. The loss experienced was that Hartati lost shares in PT. BRM and assets in the form of "Villa Ubud" (which changed its name to "Assoka Tree Resort") with a loss of around Rp.38,000,000,000 (thirty-eight billion rupiah). The case highlights the alleged falsification of documents and abuse of authority by notaries, which caused huge losses to Hartati.

Notaries as legal practitioners in the midst of the general public should serve the public by providing counseling and sharing their legal knowledge that can make it easier for the public to carry out certain legal acts, in accordance with the values of truth and justice as well as applicable laws and are prohibited from committing or ordering to commit acts of forging letters with the intention of using the letter to give up a right and telling others to use the letter as if the content is true and not fake which ultimately causes losses (Fahrawi et al., 2022; Zulfikar & Basri, 2024).

The legal gaps in this study are; The partiality carried out by the notary within his authority is legal counseling during the making of an authentic deed that is detrimental to one of the parties, non-compliance with the law by the notary as a public official who commits the crime of letter forgery, the impact that occurs on the incident of partiality during the notary legal counseling which results in material losses of one of the parties, the non-implementation of the principle of justice in a legal act carried out by a legal actor, as well as legal protection for the parties who are harmed on authentic deeds resulting from the notary nominee's partiality in the EGMS to ensure that their rights are protected (Putri Anjulika, 2023; Satya Wibowo et al., 2022).

Based on the literature search that has been carried out by the author, it is known that there is no research that is the same and similar to the research that will be researched by the author, however, the author found several studies that are similar to the research that the author conducted, including by Fadli Adi Nugroho, 2020, University of Indonesia, Faculty of Law, Master of Notaryary, "Notary Sidaliti in the Making of Deed of Power of Attorney to Sell Lacking Parties (Case Study of MPPN Decision Date July 23, 2019 Number 07/B/MPPN/VII/2019)". The thesis discusses the partiality of the Notary in making the power of attorney to sell which in the deed there is a shortage of parties, because the authentic deed in its manufacture has formal requirements and also material requirements so that the notary deed can be considered an authentic deed (Nugroho, 2020). A similar research was also conducted by Clara Chyntia Djabu, University of Indonesia, Faculty of Law, Master of Notary, "Notary Accountability for Fraudulent Acts and Partiality in the Making of Authentic Deeds". The thesis discusses the responsibility of Notaries for acts of forgery and partiality in the process of making authentic deeds they make and what legal impact will occur on the validity of the deeds they make. (Chyntia Djabu & Latumenten, 2022).

The reason the author is interested in researching this research is how notaries, as officials who are supposed to be neutral, play an important role in maintaining fairness in corporate decisions, especially in EGMS. This is important because the decisions taken in the forum can have a big impact on all parties involved. Then the author sees that the issue of partiality in legal counseling by notaries is not just a theory, but also real in various cases, this research is relevant to actual issues where notaries may be involved in actions that are detrimental to certain parties. Another reason is that for academic and practical purposes, this research combines legal theory with real practice, contributes to the development of notary law and protects the rights of shareholders from unfair actions.

On this basis, the authors are interested in studying, how are the Legal Consequences of Notary Deed Resulting from the Non-Independent Legal Counseling Process Reviewed Based on the Principle of Justice?

2. Materials and Methods

In this study, the authors use normative juridical as a research method, namely research that contains descriptions related to problems based on written law and uses other documents where it discusses problems by examining legal rules and legal principles (Benuf et al., 2020). This type of research conducts problem studies using legal, non-legal materials, and literature studies as guidelines (Kristiyanto, 2018). As for the research approach, we use the Legislative Approach, the Conceptual Approach, and the Case approach. The type of case approach aims to find the value of truth and the best solution to legal events that occur in accordance with the principles of justice (Soekanto, 1986).

3. Results and Discussion

Legal counseling by a notary is one of the important aspects in the process of making a valid and trustworthy deed. Legal counseling is also to fulfill the principle of proportionality, which is one of the important principles in the agreement (Yesi, 2023). In the practice of legal counseling, the independence of notaries plays an important role in ensuring the validity and integrity of the deeds produced. However, when legal counseling is carried out by a notary who is not independent, various risks arise that can have an impact on the validity of the resulting deed and various legal consequences can arise that have the potential to harm the parties involved. As in the case example used in this study, notary Hartono violated the principle of independence in legal counseling which then affected the legal status of the deed issued, Hartono's partiality made the deed of Minutes of the Extraordinary General Meeting of Shareholders (hereinafter referred to as EGMS) that they made, caused a criminal violation and became invalid. The deed issued by Hartono also violated several other legal provisions. In this study, the author discusses the legal consequences for the deed issued by Hartono resulting from his legal counseling that does not meet the principle of independence, and to provide a comprehensive overview of the legal implications that arise. The author divides the analysis of the legal consequences regarding the deed resulting from the legal counseling of notaries who are not independent in several parts, namely:

3.1. Analysis of the Legal Consequences of the Deed Based on the Judge's Decision

In the case of Hartono, the Gianyar District Court Decision stated that the articles violated were Article 263 paragraph (1) of the Criminal Code and Article 264 paragraph (1) of the Criminal Code (Mahkamah Agung Republik Indonesia, 2019). Article 263 paragraph (1), which is related to the forgery of letters, the Panel of Judges stated that Hartono participated in forging letters that could give rise to rights or covenants as if the letters were valid and correct. Article 264 paragraph (1) is also related to the forgery of letters, in this article it is qualified or devoted to the forgery of authentic deed documents such as notary deeds and marriage certificates. The Panel of Judges stated that Hartono was proven to have violated both articles.

The elements in the article that were fulfilled in Hartono's case were making a fake document, namely containing the signatures of Hartati and Djarius which turned out to be non-identical to the original as examined by the Forensic Laboratory of the Criminal Investigation Agency of the National Police, and another element was asking others to use the fake document as if the content was correct, namely when Hartono told his assistant Putu Adi to give the EGM deed to Hendro Nugroho, Asral, Suryadi, and Tri Endang Astuti as proof of share transfer. According to the judge's decision, the legal status of the deeds produced by Notary Hartono was declared invalid.

The judge's decision shows that the preparation of deeds carried out by a notary must be based on the principles of independence, honesty, and impartiality, as stipulated in Article 16 of the Notary Position Law. In this case, Hartono has ignored the basic

principles from the beginning by providing misleading and inaccurate counseling. Hartono gave directions that not only contradicted the provisions stipulated in the law, but also ignored the principles of legal truth. This action not only obscures the understanding that should be clear, but also directly triggers the occurrence of violations that have a serious impact on justice and legal compliance. In the end, in the future, this action will lead to a criminal violation of the deed produced by forging documents and signatures, which will result in the illegal transfer of shares. This action harms shareholders and undermines the integrity of the legal system that is supposed to protect the rights of all parties involved. The legal consequence of this act is the cancellation of the deed because the fake deed has no legal force.

3.2. Analysis of the Legal Consequences of Deeds Based on Laws

According to Law Number 2 of 2014 concerning the Notary Position (hereinafter referred to as UUJN), deeds made in a non-independent or impartial manner are legally defective and can be canceled. To determine whether the deed made by Hartono violates the UUJN, it is necessary to consider several provisions in the law, some relevant articles that can be used as a reference are; Article 15 emphasizes that a notary must act independently and impartially. In this case, if Hartono is proven to have given unfair treatment or benefited one of the parties in making the deed, his actions can be considered as a violation of the principle of independence. Furthermore, Article 16 regulates the obligation of notaries to conduct adequate checks on available documents and facts before drafting a deed. If Hartono is negligent in conducting proper verification or ignoring important facts, this is also a violation.

Then Article 19 expressly prohibits notaries from receiving illegal rewards related to the making of deeds. If there is evidence that Hartono received a reward from one of the parties, the act is a serious violation. Finally, Article 22 regulates the notary's liability for errors contained in the act. If the deed made contains errors that are detrimental to other parties and Hartono does not seek to correct them, then this can also be considered as a violation of the responsibility of the notary profession.

The evidence that has been disclosed in court shows that Hartono violated one or more of the above articles, then it can be concluded that the deed violates the provisions of the UUJN. According to the Notary Position Law (UUJN), the deed made by Notary Hartono violates several important articles. First, Article 16 paragraph (1) letter a of the UUJN states that notaries are obliged to act honestly, thoroughly, independently, impartially, and safeguard the interests of all parties involved in every legal act. However, Hartono violated this provision by not acting independently and forging signatures, which showed partiality on one of the parties. Second, Article 16 paragraph (1) letter e of the UUJN requires notaries to attach valid supporting documents in every deed made. In this case, the document used by Hartono contained a fake signature, which clearly violated the provision. Finally, Article 15 paragraph (2) letter e of the UUJN gives the authority to notaries to make authentic deeds related to all legal acts. However, the deed produced by Hartono cannot be considered authentic due to forgery. Thus, the deed made by Hartono violates several articles in the UUJN, especially related to independence, honesty, and the validity of the documents used in making the deed.

According to Law Number 40 of 2007 concerning Limited Liability Companies (hereinafter referred to as the Constitution), the EGMS deed made by Hartono was declared null and void because it contained elements of forgery and violation of Article 57 paragraph (1), Article 85 and Article 86 paragraph (1) of the Constitution. According to Article 57 paragraph (1) of the UUPT, the transfer of shares in a limited liability company must go through certain procedures and requires the approval of the legal shareholders. In this case, the deed prepared by Hartono transferred the shares without the consent or presence of interested parties, namely Hartati and Djarius Haryanto who did not even know that the meeting was held. In addition, Article 85 paragraph (1) of the UUPT requires a valid decision from the General Meeting of Shareholders (hereinafter referred to as the GMS) for actions such as changes in the share ownership structure. The deed made by Hartono violated this provision because the decision was taken without a valid GMS.

Finally, Article 86 paragraph (1) of the UUPT states that the resolution of the GMS must be based on the valid votes of the shareholders present. In this case, the deed prepared by Hartono violated this article because the EGMS was never attended by the parties who should have attended, such as Hartati and Djarius Haryanto. Overall, the deed violates the procedures set by the UUPT in terms of share transfer and approval at the EGMS.

3.3. Analysis of the Legal Consequences of Deeds Based on the Professional Code of Ethics

In the notary code of ethics, there are generally principles that govern the obligation of notaries to act with integrity, honesty, and professionalism (HS. et al., 2020). Article 2 states that notaries are obliged to uphold the public interest and act in good faith. This includes the responsibility not to create a deed that could cause legal problems or violate applicable regulations. Article 3 regulates the obligation of notaries to maintain honesty and integrity in carrying out their duties. This can also be interpreted that the notary must not be involved in the making of deeds that violate the law.

The provisions of Article 4 lead to the responsibility of the notary to ensure that the deeds he makes comply with the applicable law. Article 4 states that notaries are obliged to make deeds in accordance with applicable laws and regulations. This underscores the notary's responsibility to ensure that every deed it makes is valid and in accordance with the provisions of the law. The above articles emphasize the importance of legal compliance in making deeds, if a notary makes a deed that violates the law, this can be considered a violation of the code of ethics because it concerns the notary's responsibility in maintaining the validity and authenticity of the legal documents he makes. The code of ethics emphasizes the importance of honesty and integrity, which means notaries should not engage in practices that could raise doubts about the validity of the deed.

The deed made by Hartono is proven to violate the provisions stipulated in the law, then the deed is considered invalid according to the provisions contained in the notary code of ethics. This is because the code of ethics emphasizes that every deed prepared by a notary must comply with applicable laws and regulations and must reflect the principles of honesty and integrity. Therefore, any violation of the law will have implications for the validity of the deed produced, so that the deed cannot be legally recognized.

4. Conclusions

The legal consequences of a notary deed resulting from a non-independent legal counseling process are legally defective and can be canceled because the process of making the deed does not consider the concept of "justice as fairness" contained in the principle of justice.

As a recommendation, stricter supervision from the Regional and Central Supervisory Councils is needed on notary practices, especially those related to independence and integrity. This step is important to ensure that violations such as those that occurred in this case are not repeated, as well as to maintain public trust in the notary profession.

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