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## The role of the notary regional supervisory board towards a notary who carries out his duties in a declining health condition (A research in Bener Meriah District)

Lianda Febriani<sup>1</sup>, Suhaimi<sup>2\*</sup>, Dahlan<sup>2</sup>

<sup>1</sup> Master of Notary, Faculty of Law, Syiah Kuala University, Banda Aceh, Indonesia

<sup>2</sup> Faculty of Law, Syiah Kuala University, Banda Aceh, Indonesia

\*Corresponding Author: pak\_emy@unsyiah.ac.id

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### Abstract

Notaries and Land Deed Maker Official (PPAT) are officials authorized to make legal deeds. Notaries and PPAT issue deeds that provide legal clarity and protection to interested parties. As a result, the Supervisory Council oversees Notaries and PPAT in carrying out their tasks. The Minister is in charge of appointing and dismissing Notaries and PPAT. The Notary resigns or is respectfully dismissed from his position as a Notary due to his spiritual and/or physical inability to perform the duties of his position as a Notary continuously for more than three years, according to Article 8 paragraph (1), letter d of Law Number 2 of 2014 on Amendments to Law Number 30 of 2004 on the Position of Notaries. Furthermore, according to Article 10 paragraph (1) letter b of Government Regulation Number 24 of 2016 Amendment to Government Regulation Number 37 of 1998 on Regulation of the Position of PPAT, a PPAT is respectfully dismissed from his position if he is no longer able to perform his duties due to his physical or mental health, as determined by an authorized team of health examiners at the request of the Minister or an appointee. However, in the Bener Meriah district, a Notary and/or has held his position for more than two years despite his deteriorating health. As a result, the Supervisory Council's authority as a body with the jurisdiction to monitor and build Notaries and PPAT is established. The research sought to examine and analyze the Supervisory Board's function in the case of Notaries and PPAT who continue to work despite health difficulties. Additionally, the research was conducted to ascertain the Supervisory Council's activities and the fines that will be levied on Notaries and PPAT who continue to do their jobs despite poor health.

**Keywords:** notary regional supervisory council, declining health conditions

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### Introduction

The public service sector evolves with the times, responding to the community's need for services. Additionally, it affects the services given by Notaries and PPAT, who are authorized to execute authentic deeds with complete evidential power. Notaries and PPAT play a critical role in legal traffic, particularly when it comes to drafting deeds that provide legal clarity and protection to the community<sup>[1]</sup>.

The authority granted by laws and regulations to Notaries and PPAT is aimed at the public interest in order to ensure legal certainty and the orderly administration of government. Therefore, Notaries and PPAT in performing their duties and positions are supervised by the Supervisory Council. In the case of the appointment and dismissal of a Notary and PPAT, it is conducted by the government<sup>[2]</sup>.

The Supervisory Council is a body formed by the ministry and is given the authority to foster and supervise Notaries and PPAT. Notaries and PPAT are different professions; therefore, supervision is conducted by different Supervisory Boards. Notaries are supervised by a Notary Supervisory Council formed by the Ministry of Law and Human Rights, while PPAT are supervised by a Supervisory Council and PPAT formed by the Ministry of Agrarian Affairs and Land.

The Supervisory Council was established to enhance the competence and professionalism of Notaries and PPAT. Additionally, the Supervisory Council is empowered to provide guidance and supervision regarding the performance of Notaries and PPAT duties and positions in line with applicable law.

Notary and PPAT are positions that require professionalism and responsibility in performing their duties, so a Notary and PPAT must comply with the rules stipulated in the Legislation and Code of Ethics<sup>[3]</sup>. Therefore, if the Notary and the PPAT I do not carry out their positions based on the laws and regulations, there will be sanctions received by the relevant Notary and the PPAT<sup>[4]</sup>.

However, the arrangements for Notaries and PPAT should have been thoroughly regulated in the applicable legislation to ensure that Notaries and PPAT can perform their duties properly and responsibly. However, one of the legislation's sections is considered to have an ambiguous norm. One of the regulations deemed to have imprecise standards is one governing individuals' health conditions while performing their activities and responsibilities<sup>[5]</sup>.

One of the subjective prerequisites for appointment as a Notary and PPAT is good health especially in carrying out a public official's inherent authority. Physical and spiritual well-being are interdependent with performance. If the Notary and PPAT continue to execute their duties while suffering from mental or physical illness, it will have an effect on the deed that will be issued. Notaries and PPAT deeds give legal certainty and can serve as the basis for fundamental rights over the rights and obligations of an item in general, referred to as material rights. Thus, the Notary and PPAT must issue a deed in good physical and spiritual condition to avoid future complications<sup>[6]</sup>.

In Article 8 paragraph (1) letter d of Law Number 2 of 2014 concerning Amendments to Law Number 30 of 2004 concerning the Position of a Notary, it is stated that a notary is respectfully terminated or dismissed from his position if he is spiritually and/or physically unable to perform Notary duties continuously for a period of more than three (three) years.

Furthermore, the provisions governing PPAT are regulated in Article 10 paragraph (1) letter b of Government Regulation Number 37 of 1998 concerning Position Regulations for Land Deed Officials which states that PPAT are honorably dismissed from their positions if they are unable to perform their duties due to their physical or mental health, as determined by the competent health inspection team at the request of the Minister or an authorized representative.

The two regulations that regulate physical and mental health only regulate termination but do not regulate the standard of being physically and mentally healthy. These regulations also do not further regulate the role of the Supervisory Board in conducting guidance and supervision of Notaries and PPAT who continue to perform their duties in a failing health state prior to three years.

The Supervisory Board plays a critical role in supervising the Notary and PPAT in order to avoid future violations and problems caused by the deed being issued in an unfit physical and spiritual condition. As long as one's physical and spiritual conditions are disturbed, the authenticity of the deed issued by the Notary and Deed Officer is doubtful, and being in an unhealthy state will impact one's mental capacity owing to an uncomfortable physical condition<sup>[7]</sup>.

Based on the results of Thesis Research by Achmad Feri Hidayatullah, Master of Notary Law, Narotama University, Surabaya 2018, it is stated that, in principle, the limits of a Notary's physical and spiritual health are body conditions that can be used to execute normal activities. In addition, the condition of the body is also in a comfortable condition so that the work gets the best results. The body is declared healthy when there are no disturbances in the five senses used by the notary in performing his or her duties<sup>[8]</sup>.

According to what has been explained above, the researcher is interested in bringing up the subject based on his or her professional experience. The researcher discovered a Notary and/or PPAT who is ill or physically unwell while using his position and authority. The notary is based or has an office on Jl. Regent's Hall Complex, Simpang III, Bener Meriah Regency, in accordance with SK. Minister of Law and Human Rights of the Republic of Indonesia No. AHU-01082. AH.02.01. 2017 and the Decree of the Head of the National Land Agency of the Republic of Indonesia in 2018. The notary's initial is HM.

In this situation, the Notary and/or the PPAT have served as public officials for four years. The notary's health and physical condition remained normal during the first and second years. However, in the third and fourth years, in 2020 and 2021, health and physical conditions worsened, with a considerable difference in physical changes between early and late 2020. His body weight was dwindling, his skin was becoming paler, and his vision was becoming progressively blurred.

On the basis of these data, it is evident that there were issues with the public official's five senses, the primary one being the eyes. It undoubtedly interferes with his performance of his duties and obligations as a public officer providing legal services with all the associated liabilities. And this is the Supervisory Council's power, particularly the Regional Supervisory Council, because the Notary and/or PPAT are resident in the Regency/city.

**Based on the description of the background above, the formulation of the problem discussed in this study are**

1. What is the Regional Supervisory Council's duty with regard to Notaries who continue to perform their duties despite deteriorating health?
2. What is the role of the Board of Trustees and Supervisors of PPAT towards Land Deed Officials who continue to carry out their duties in a declining health condition?

The research discussed in this journal is original because there are no journals that specifically discuss the discussion of the above problems.

### **Research Method**

The research method is the process through which research is conducted. The technique is a scientific activity that involves using a (systematic) approach to comprehending a subject or object of research to arrive at scientifically justified answers and contain validity<sup>[9]</sup>.

The research method employed in this study is normative juridical, which is backed up by empirical evidence by defining law as pattern-based behavior. This study took an analytical and case-based approach to its research. This analytical technique analyzes legal texts and conducts a conceptual evaluation of the meaning of laws and

regulations and their application in practice. Meanwhile, the case approach is an approach that aims to learn how to apply legal norms or rules as outlined in practice <sup>[10]</sup>.

The primary legal materials used in this research are as follows:

1. Regulation of the Minister of Law and Human Rights Number 16 of 2021 concerning Organizational Structure, Procedures for Appointing Members, Dismissing Members, and Working Procedures of the Supervisory Council of the Notary State Gazette Number 211 of 2021.
2. Regulation of the Minister of Law and Human Rights Number 19 of 2019 concerning Terms and Procedures for Appointment, Leave, Transfer, Dismissal, and Extension of the Office of Notary State Gazette Number 990 of 2019.
3. Regulation of the Minister of Agrarian and Spatial Planning / Head of the National Land Agency Number 2 of 2018 concerning the Guidance and Supervision of Land Deeds Official in the State Gazette Number 395 of 2018.
4. Regulation of the Head of the National Land Agency Number 10 of 2010 concerning the Establishment of Representatives of the Land Office of Bener Meriah Regency, Aceh Province.
5. Regulation of the Head of the Land Agency Number 1 of 2006 concerning the Implementation of Government Regulation Number 37 of 1998 concerning the Regulation of the Position of the Land Deeds Official.

Secondary legal materials are those that can be used to explain primary legal documents, such as legislation, research findings, research journals, and scholarly literature <sup>[11]</sup>. Tertiary legal materials are those that explain primary and secondary legal materials, for example, the Great Indonesian Dictionary and the Legal Dictionary.

The data and legal materials in this study were analyzed using existing legal theory and applicable laws and regulations. The data were analyzed using the normative juridical analysis approach. The method of normative juridical analysis is a method of interpretation that is founded on legal comprehension, legal standards, legal theories, and doctrines pertinent to the subject matter. The facts gathered as a consequence of library research were analyzed, and conclusions about the issue were drawn.

## **Results and Discussion**

### **The Role of the Regional Supervisory Council for Notaries Who Continue to Carry Out Their Duties in Declining Health Conditions**

The Notary Regional Supervisory Council is empowered to perform first-level supervision through preventative and curative measures. Until now, the Central Aceh Regional Supervisory Council has performed preventive supervision through regular progressive inspections once a year. The Central Aceh Supervisory Council reviews the Notary Protocol during this routine inspection by visiting each Notary office under its authority. Meanwhile, Curative Supervision is conducted when the Central Aceh Supervisory Council receives information on alleged Notary violations. The Notary Regional Supervisory Council may accept reports from the concerned Notary, the Notary's family, Notary employees, or even the general public (Article 76 Regulation of the Minister of Law and Human Rights Number 19 of 2019). The Regional Supervisory Council does not immediately penalize Notaries who continue to perform their duties despite declining health. Prior to authorizing an honorable dismissal, a Notary is reprimanded and recommended to seek to leave if he continues to execute his duties in a state of disturbed physical and mental health. It is because the Supervisory Board's responsibility is to give direction and oversight of Notary violations and the proper functioning of the Notary's position in compliance with applicable laws and regulations.

#### **1. Notary Leave**

According to the Minister of Law and Human Rights' Regulation No. 16 of 2021 on the Organizational Structure and Work Procedures, Appointment and Dismissal Procedures, and the Budget of the Notary Supervisory Council, the Supervisory Council has administrative authority that does not require the Supervisory Council meeting's approval to grant leave permission to the Notary Public. The Regional Supervisory Council may grant leave permits for up to six months (Article 29 Regulation of the Minister of Law and Human Rights Number 16 of 2021).

If six months of leave is not sufficient to restore his health, the Notary may apply for leave of up to one year to the Regional Supervisory Council (Article 31 Article 29 Regulation of the Minister of Law and Human Rights Number 16 of 2021). Furthermore, the Notary can apply for Notary leave of more than one year to the Central Supervisory Council (Article 33 Article 29 Regulation of the Minister of Law and Human Rights Number 16 of 2021).

Notaries may request for leave after serving in a position for two years, not fulfilling the maximum number of notary leave, which is a maximum of 12 (twelve) years and appointing a substitute notary. Leave can be requested electronically by completing a leave application form and submitting it to the Minister. To get a permit and sign a leave certificate, an application should be made to the Regional Supervisory Council, Regional Supervisory Council, and Central Supervisory Council, along with supporting documentation, according to the time period for taking leave.

If the request is granted, the Regional Supervisory Council, the Regional Supervisory Council, and the Central Supervisory Council sign a leave certificate containing information on the leave taken and record it in the Notary's leave register book (Article 24 and Article 25 of the Regulation of the Minister of Law and Human Rights Number 19 of 2019).

## **2. Verbal and Written Warning**

Verbal and written warnings are intended to educate notaries who break laws and regulations on how to avoid repeating the violation or even ceasing to perpetrate the current offense. The Regional Supervisory Council has the right to impose sanctions for verbal and written warnings depending on the results of the examination and the Regional Supervisory Council's judgments (Article 32 of Law Number 16 of 2021).

## **3. Respectful Dismissal**

### **a. Proposal for dismissal from Notary**

The regulation regarding the dismissal of a Notary is further regulated by the Regulation of the Minister of Law and Human Rights Number 19 of 2019 concerning Terms and Procedures for Appointment, Leave, Transfer, Dismissal, and Extension of the Notary's Term. In particular, Article 76 regulates the procedure for notifying the Regional Supervisory Council against a Notary who submits an application to quit for being physically or mentally incapacitated. The notification may be submitted manually or electronically to the Regional Supervisory Council; it may be delivered directly by the Notary concerned, the Notary's husband or wife, a straight line family up or down, a sideline family up to the third degree, or a marriage family up to the third degree. If the Notary or the family does not submit a notification in this circumstance, the Notary's employees may do so to the Regional Supervisory Council. Based on the proposed dismissal, the Regional Supervisory Council appoints another Notary as the holder of the protocol.

### **b. Proposal for Dismissal from the Regional Supervisory Council**

The notary is dismissed by the Minister, in this case, the Minister of Law and Human Rights. The notary is dismissed for several reasons, one of which is the declining condition of the physical and/or spiritual health of the notary. So, to prove the existence of a disturbed health condition, a Supervisory Board can directly examine the condition of the Notary, accompanied by a team of health examiners, in this case, a doctor and/or psychiatrist.

In performing its duties, the Supervisory Council applies the principles of coordination, integration, and synchronization. So that in carrying out the examination of the Notary HM, who is domiciled in the Bener Meriah district, the Regional Supervisory Council must still coordinate with the Regional Supervisory Council, then to submit a dismissal must first be proposed to the Minister through the proposal of the Regional Supervisory Council to the Central Supervisory Council.

The proposal for a respectful dismissal or so-called recommendation issued by the Regional Supervisory Council must be based on a certificate from the doctor and/or psychiatrist regarding the results of the health condition and must be based on the approval of the Regional Supervisory Council held in the Regional Supervisory Council meeting.

Based on the results of interviews with Mr. Amir Syam, S.H., M.H. He stated that so far in regard to curative supervision, there has been no action taken by the Regional Supervisory Council against HM Notary, who is still carrying out his positions as notaries. This is because Article 8 letter d regarding the physical and mental health of Notaries has not been clearly regulated, so to explore this issue, the Supervisory Council must first discuss it while continuing to carry out routine supervision of the Notary HM before the issuance of a decision from the Regional Supervisory Council. Furthermore, Mr Amir Syam stated that the Central Aceh Regional Supervisory Council's guidance and supervision of four regencies; Central Aceh, Bener Meriah, Gayo Lues, and Southeast Aceh, has yielded no tangible achievements because:

1. Due to a lack of human resources, the Central Aceh Regional Supervisory Council is tasked with providing direction and oversight in four district regions that are fairly apart from one another. As a result, the outcomes of monitoring and guiding are inefficient.
2. Has not chosen a Secretary to assist the Central Aceh Regional Supervisory Council in carrying out its duties and has not determined the role of the Central Aceh Regional Supervisory Council's secretariat.
3. The Central Aceh Supervisory Council is also composed of representatives from agencies, each of which has its own set of duties and responsibilities, which is one of the reasons why curative oversight of Notaries has not been executed <sup>[12]</sup>.

## **The Role of the Board of Trustees and Supervisors of Regional Land Deed Officials on Land Deed Officials Who Continue to Exercise Their Duties in Declining Health Conditions**

Supervision conducted by the Board of Trustees and Supervisors of Regional Land Deed Officials includes:

### **a. Preventive Supervision**

According to Amir Syam, preventive supervision is conducted by the Head of Representative of the Land Office of Bener Meriah Regency by making visits to the offices of the Land Deed Officials. This aims to monitor the performance of the Land Deed Officials directly as well as assess the condition of the Land Deed Officials in performing their duties.

According to Article 9 paragraph (1) of the Regulation of the Head of the National Land Agency Number 10 of 2010 concerning the Establishment of a Representative for the Land Office of Bener Meriah, Aceh, the Land Office Representative is accountable to the Head of the Main Office in carrying out its duties and functions in accordance with statutory regulations. It means that the Land Office Representative in doing his duties and functions both as a Land Office official and as a member of the Advisory Board and Supervisory Council for Regional Land Deed Officials, must still coordinate with the head of the central office.

### **b. Repressive Supervision**

Based on the principle, repressive supervision is conducted after an alleged violation is found or there are reports from the community regarding violations committed by the Land Deed Official. As provided in Article 30 of the Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency Number 2 of 2018 concerning the Guidance and Supervision of PPAT, the authority to examine alleged violations committed by the MPPD consists of 4 stages:

1. The first level examination of the alleged violation is carried out by the MPPD on the concerned PPAT.
2. Giving a written warning to the PPAT who is proven to have committed a violation.
3. Forming and assigning audit teams to check on community reports.
4. The chairperson, deputy chairman and members of the MPPD can become an inspection team on the condition that they do not have a family member relationship or marriage with the alleged violator.

MPPD as the one who conducted guidance and supervision in taking action to impose sanctions still pays attention to the stages before imposing sanctions with respect to dismissal, the stages are:

#### **1. PPAT Leave**

The leave can be applied for a number of reasons, such as:

- a. Annual leave of maximum 2 (two) weeks every year
- b. Sick leave includes maternity leave, and the period of this leave is based on the patient's needs according to a statement from the doctor
- c. Leave due to other important reasons that can be taken if necessary by the PPAT with a maximum leave period of 9 months every 3 years (Article 37 paragraph (1) of the Regulation of the Head of the National Land Agency Number 1 of 2006).

The PPAT may submit applications for leave based on the duration of the leave. Leave applications for less than three months are filed to the Land Office's Head. Meanwhile, leave of less than six months is filed to the Regional Office's Head, while leave of six months or more is submitted to the Land Agency's Head (Article 37 paragraph (3) of the Regulation of the Head of the National Land Agency Number 1 of 2006).

#### **2. Written warning**

A written warning is a formal warning issued by the MPPD to a PPAT who has been found to have violated the law. The Head of the Land Office may authorise a written warning, which may be examined in advance or without examination by the MPPD (Article 30 Paragraph (2) Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the Land Agency Number 2 of 2018).

#### **3. Respectful Dismissal**

Respectful dismissal is the last sanction for PPAT who continue to perform their responsibilities and positions despite worsening physical and mental health, despite MPPD recommendations to take leave and disregard written warning letters.

Because the Minister alone has the authority to remove the PPAT, the MPPD is only authorized to conduct an examination and then take decisions depending on the outcome of the Land Office discussion. Then, as chairman of the MPPW, the Head of the Land Office submits the MPPD's recommendation for sanctions to the Head of the BPN Regional Office (Article 35 paragraph (2) Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the Land Agency Number 2 of 2018).

The MPPW then followed up on the report on the results of the discussion from the MPPD. Based on the results of the follow-up from the MPPW, the results of the examination and follow-up from the MPPW still provide recommendations regarding respectful dismissal. Then the MPPW or the Head of the BPN Regional Office submits a proposal to the Director General as the chairman of the MPPP (Article 41 paragraph (7) Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the Land Agency Number 2 of 2018).

If the result of the examination is a respectful dismissal, the Minister will follow up by stipulating a Decree of Respectful Dismissal (Article 47 paragraph (1) Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the Land Agency Number 2 of 2018).

The decision result based on the recommendation for the sanction of honourable dismissal from MPPD, MPPW and MPPP is officially submitted to the PPAT concerned with a copy to IPPAT or to the reporter if the finding of violation comes from a public report if necessary (Article 48 paragraph (1) Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the Land Agency Number 2 of 2018).

According to Mr Mustafa M, S.ST., M.M., the Head of the Representative of the Land Office of the Bener Meriah and the Deputy Chairman of the Supervisory and Supervisory Council for PPAT in the Central Aceh Regency from the Ministry element, preventive and repressive guidance and supervision have not been taken on PPAT who are still performing their duties and positions due to the authority being at the Central Aceh Regency. Meanwhile, the Land Office Representative must collaborate with the Central Aceh Land Office, the Supervisory Council, and the Supervisor of the PPAT.

### Conclusion

The Regional Supervisory Council of Central Aceh has the authority to provide guidance and supervision to 4 districts: Bener Meriah Regency, Central Aceh Regency, Gayo Lues Regency, and Southeast Aceh Regency. In conducting supervision related to Notaries who are still performing their duties and positions in a state of declining physical and mental health, the Central Aceh Regional Supervisory Council has not fully implemented guidance and supervision. It is because the Central Aceh Regional Supervisory Council has just been formed and has not yet established a secretariat, and has not appointed a secretary who can help implement and be responsible for the management and implementation of the guidance and supervision carried out by the Central Aceh Regional Supervisory Council.

The implementation of guidance and supervision of PPAT who are still exercising their duties and positions in a state of declining physical and spiritual health by the Supervisory Board and Supervisory PPAT in the Bener Meriah area has not been fully implemented as stipulated in the Legislation. This happened because the authority for fostering and supervising is in the Central Aceh Land Office as the main office. In addition to that, a new program has not yet been formed for the Chairperson of the Supervisory Council and Supervisory Officer for the PPAT of Central Aceh Regency who has just been appointed as the Head of the Central Aceh Land Office.

### References

1. Ghansham Anand, *Karakteristik Jabatan Notaris di Indonesia*. Sidoharko: Zifatama Publisier, 2014.
2. Kanter EY, *Etika Profesi Hukum. Sebuah Pendekatan Sosio Religius*, Jakarta: Stora Grafika, 2001.
3. Edison Dahlan, Ilyas Ismail, *Pelaksanaan Pengawas Terhadap Notaris oleh Majelis Pengawas Daerah di Kota Banda Aceh*. *Jurnal Ilmu Hukum: Universitas Syiah Kuala*, Banda Aceh, 2014:2(4).
4. Selly Yashinta Theresa Laseduw, *Article History: Kekuatan Pembuktian Akta Notaris dibuat oleh Notaris yang Sedang Diusulkan untuk Diberhentikan dengan Tidak Hormat*. *Universitas Airlangga*, Surabaya, 2019:2(1).
5. Dyah Ayu Puspitasari. *Makna Sehat Rohani Sebagai Syarat Notaris Menjalankan Jabatan*, Tesis: Fakultas Hukum Universitas Jember, 2019.
6. Dyah Ayu Puspitasari. *Makna Sehat Rohani Sebagai Syarat Notaris Menjalankan Jabatan*, Tesis: Fakultas Hukum Universitas Jember, 2019.
7. Dudi Hartono, *Modul Keperawatan. Psikologi, Pusdik SDM Kesehatan, Badan Pengembangan dan Pemberdayaan Sumber Daya Manusia Kesehatan*, Jakarta Selatan, Cetakan Pertama, 2016.
8. Achmad Feri Hidayatullah. *Tesis: Otensitas Akta Yang Dibuat Oleh Notaris Yang Tidak Sehat Jasmani*, Magister Kenotariatan, Fakultas Hukum, Universitas Narotama, Surabaya, 2018.
9. Rosady Ruslan. *Metode Penelitian Publik Relations dan Komunikasi*, Jakarta: Rajawali Pers, 2003.
10. Jonaedi Efendi, Johnny Ibrahim. *metode penelitian hukum normatif dan empiris*, Jakarta: Prenamedia Group, cetakan kedua, 2019 2018.
11. Soerjono Soekanto dan Sri Mamudji, *Penelitian Hukum Normatif*. Jakarta: PT Raja Grafindo Persada, 1983.
12. Interview with the Chairperson of the Notary Regional Supervisory Council of Central Aceh Regency: Academic Elements, Mr Amir Syam, S.H., M.H, at the Takengon Muhammadiyah College of Law Campus, 2022.