

Legal Certainty on Dishonorable Notary

Dismissal for Serious Violations

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ABSTRACT

This study aims to analyze the legal regulation governing the dishonorable dismissal of notaries due to serious violations of their statutory duties and prohibitions and to formulate a normative reformulation of the relevant legal provisions. This research employs a normative legal research method using statutory, conceptual, and case approaches through the analysis of legislation, legal doctrines, and relevant judicial decisions. Unlike the study by Iman Zenza Bronica, which focuses on the benchmarks for administrative sanctions, the research of Nur Afni Hidayanti, which examines the legal consequences of violations on the validity of notarial deeds, and the study by Nilna Muna Yuliandari, which analyzes legal remedies against the dismissal of notaries, this research specifically addresses the ambiguity of Article 12(d) of Law Number 2 of 2014, particularly the phrase "serious violation" as the legal basis for dishonorable dismissal. The findings reveal that the provision fails to satisfy the principles of legal clarity, predictability, coherence, and consistency, thereby allowing subjective interpretation in the imposition of sanctions and resulting in disparities in the treatment of similar violations. The novelty of this study lies in the formulation of objective criteria for determining serious violations, including repeated violations, criminal offenses related to the exercise of notarial duties carrying a statutory maximum imprisonment of less than five years, and violations committed during a period of temporary suspension, as the basis for reformulating Article 12(d) of the Law on Notarial Office. This reformulation is expected to provide more measurable guidelines for the Notary Supervisory Council in imposing sanctions consistently and to serve as a reference for legislators in improving the legal framework governing the dismissal of notaries.

Keywords: Notary Dismissal; Serious Violations; Administrative Sanctions; Normative Reformulation; Legal Certainty.

1. INTRODUCTION

A notary is a public official authorized by the state to execute authentic deeds that serve as evidence with perfect evidentiary value under civil law. This position makes notaries one of the essential pillars in ensuring legal certainty in various legal relationships within society. Accordingly, notarial duties must be performed professionally, independently, honestly, and in accordance with the prevailing laws and regulations to preserve public trust in the notarial profession (Adjie, 2014). In addition to granting broad authority, the Law on Notarial Office also stipulates various obligations, prohibitions, supervisory mechanisms, and administrative sanctions as instruments to uphold the dignity and integrity of the notarial profession (Tan Thong Kie, 2000).

Supervision of notaries constitutes an integral component of the notarial system to ensure that the exercise of notarial authority remains within the legal framework. Under Law Number 2 of 2014 concerning the Amendment to Law Number 30 of 2004 on the Office of Notary, sanctions imposed on notaries are classified into those relating to the legal consequences of authentic deeds



and administrative sanctions concerning the notarial office. Administrative sanctions serve both preventive and repressive functions to ensure that notaries fulfill their statutory obligations in accordance with applicable legal provisions (Annas, 2025). Through this supervisory system, professionalism, accountability, and legal protection for users of notarial services are expected to be maintained.

The regulation of notarial supervision has become increasingly significant in response to the growing public demand for legal services based on authentic deeds. According to data from the Directorate General of General Legal Administration of the Ministry of Law, the notarial office formation system has been implemented across 509 notarial jurisdictions throughout Indonesia as a mechanism for regulating the distribution and necessity of notarial positions. The extensive coverage of these jurisdictions demonstrates that effective supervision is essential for maintaining the quality of legal services. Consequently, the imposition of administrative sanctions must be based on clear, objective, and consistent legal norms to ensure legal certainty for both notaries and the public.

One of the most severe administrative sanctions is dismissal with dishonor, as stipulated in Article 12 letter (d) of the Law on Notarial Office. This provision states that a notary may be dishonorably dismissed for committing a serious violation of the obligations and prohibitions governing the office. However, the legislation does not provide clear parameters defining what constitutes a "serious violation." The elucidation of the article merely states that a serious violation refers to the failure to fulfill obligations and compliance with prohibitions applicable to notaries, without establishing normative indicators that may serve as a basis for classifying the gravity of a violation (Asshiddiqie, 2021). Consequently, this provision creates a vague norm, giving rise to multiple interpretations in its application.

The ambiguity becomes more apparent when Article 12 letter (d) is compared with Article 9 paragraph (1) letter (d) of the Law on Notarial Office, which regulates the temporary suspension of notaries who violate the obligations and prohibitions of their office. Both provisions address essentially the same type of misconduct but prescribe different legal consequences without establishing a clear distinction between an ordinary violation and a serious violation. This inconsistency is incompatible with the principle of legal certainty, which requires legal norms to be formulated clearly, consistently, and predictably for all legal subjects (Marzuki, 2017).

This normative ambiguity is also reflected in the enforcement practices of the Notary Supervisory Council. In Decision of the Central Notary Supervisory Council No. 11/B/MPPN/XII/2018, a notary who performed notarial duties outside the territorial scope of his authority was sanctioned with dismissal with dishonor. Conversely, Decision No.



08/B/MPPN/XI/2018, involving a violation of a substantially similar nature, imposed only a six-month temporary suspension. The inconsistent application of sanctions for comparable violations demonstrates the absence of objective criteria for determining when a violation should be classified as serious. Consequently, the imposition of sanctions largely depends on the interpretation of the Notary Supervisory Council (Heldawati, 2025). This disparity indicates that the core issue lies not merely in the supervisory mechanism but rather in the absence of normative parameters defining the phrase "serious violation" as the legal basis for dismissal with dishonor. In fact, the Law on Notarial Office explicitly designates supervision as a state function exercised by the Regional, Provincial, and Central Notary Supervisory Councils. Therefore, the effectiveness of the supervisory system fundamentally depends on the clarity of the legal norms governing the imposition of administrative sanctions.

Previous studies have examined administrative sanctions imposed on notaries. Iman Zenza Bronica (2025) concluded that the Law on Notarial Office does not provide clear benchmarks regarding the severity of violations as the basis for imposing administrative sanctions, thereby creating the potential for subjective decision-making in practice. Meanwhile, Nur Afni Hidayanti (2021) focused on the legal consequences of notarial misconduct concerning the evidentiary value of authentic deeds and the civil liability of notaries. Another study by Nilna Muna Yuliandari (2021) analyzed the legal remedies available to notaries against dismissal decisions through the Administrative Court. These studies have made valuable contributions to the development of Indonesian notarial law; however, none specifically examines the legal certainty surrounding the phrase "serious violation" in Article 12 letter (d) of the Law on Notarial Office as the legal basis for dismissal with dishonor. More importantly, no previous research has developed normative parameters for defining serious violations through an integrated analysis of the normative disharmony within the Law on Notarial Office, disparities in the decisions of the Notary Supervisory Council, and the principle of legal certainty as the foundation for reformulating Article 12 letter (d).

Accordingly, a significant research gap remains regarding the absence of a comprehensive study that specifically analyzes the normative construction of serious violations from the perspective of legal certainty while proposing a reformulation capable of establishing objective criteria for determining conduct that qualifies as a serious violation. The clarity of legal norms constitutes an essential requirement for sound legislative drafting because it ensures legal certainty, prevents multiple interpretations, and promotes consistency in law enforcement (Hadjon, 2005). Therefore, a study is required not only to identify the weaknesses of the existing legal framework but also to formulate a clearer and more systematic normative standard.



Based on the foregoing, this study is of considerable importance because the ambiguity surrounding the phrase "serious violation" in Article 12 letter (d) of the Law on Notarial Office has created legal uncertainty in the application of administrative sanctions. The lack of normative clarity allows different interpretations by the Notary Supervisory Council when classifying violations of notarial obligations and prohibitions, resulting in substantially similar misconduct being subject to different sanctions. Such circumstances are inconsistent with the principle of legal certainty, which requires legal norms to be formulated in a clear, consistent, and predictable manner.

The novelty of this research lies in its comprehensive analysis of the phrase "serious violation" in Article 12 letter (d) of the Law on Notarial Office from the perspective of legal certainty by integrating three analytical dimensions: (i) the normative disharmony between Article 9 paragraph (1) letter (d) and Article 12 letter (d) of the Law on Notarial Office; (ii) the disparity between the decisions of the Central Notary Supervisory Council in Decision No. 11/B/MPPN/XII/2018 and Decision No. 08/B/MPPN/XI/2018; and (iii) the theory of legal certainty as the basis for formulating objective normative parameters defining serious violations. Unlike previous studies, which primarily focused on the system of administrative sanctions, notarial liability, or legal remedies against dismissal decisions, this research proposes a reformulation of Article 12 letter (d) of the Law on Notarial Office by establishing objective indicators of serious violations that may serve as practical guidelines for the Notary Supervisory Council in imposing sanctions of dismissal with dishonor in a consistent, proportionate, and legally certain manner.

2. RESEARCH METHODS

This study employs normative legal research focusing on the analysis of legal norms governing the dishonorable dismissal of notaries due to serious violations of their statutory duties and prohibitions as stipulated in the Law on Notarial Office. The research adopts a statutory approach, a conceptual approach, and a case approach. The statutory approach is used to examine the consistency and harmonization of legal provisions concerning the dismissal of notaries. The conceptual approach is employed to analyze the concepts of legal certainty, normative clarity, and the theory of legislative drafting. Meanwhile, the case approach is utilized to examine decisions of the Notary Supervisory Council and court judgments concerning the imposition of dismissal sanctions against notaries. The cases were selected purposively based on the following criteria: (1) they are directly related to the implementation of Article 12(d) of the Law on Notarial Office; (2) they have obtained final and legally binding decisions; and (3) they demonstrate inconsistencies in



the application of sanctions for violations with similar characteristics, thereby providing a relevant basis for examining issues of legal certainty. The research was conducted through library research using relevant legal sources.

The legal materials consist of primary, secondary, and tertiary legal materials, which were selected purposively based on their relevance, binding authority, and credibility in relation to the research issues. The primary legal materials include Law Number 2 of 2014 concerning the Amendment to Law Number 30 of 2004 on Notarial Office, the Indonesian Criminal Code, the Indonesian Civil Code, implementing regulations in the field of notarial practice, and the Notary Code of Ethics. Secondary legal materials comprise books, journal articles, master's theses, doctoral dissertations, and other scholarly publications addressing legal certainty, professional misconduct, and notarial supervision. Tertiary legal materials include legal dictionaries, the Great Dictionary of the Indonesian Language, and legal encyclopedias. The legal materials were analyzed qualitatively through the stages of inventorying and classifying legal materials, identifying legal issues, applying grammatical, systematic, and teleological interpretation, and formulating legal arguments and normative reformulation. The validity of the legal arguments was maintained through consistent interpretation of statutory regulations, scholarly doctrines, general principles of law, and the judicial decisions examined in this study, thereby producing systematic, logical, and academically accountable legal reasoning.

3. RESULTS AND DISCUSSION

Dishonorable Dismissal of Notaries for Gross Violations of Official Duties and Statutory Prohibitions

The regulation governing the dishonourable dismissal of Notaries for serious violations of their statutory duties and prohibitions under Article 12(d) of the Law on the Office of Notary is fundamentally intended to preserve the dignity of the notarial profession as an *officium nobile*. However, the findings of this study demonstrate that the provision has not yet ensured legal certainty because the phrase "serious violation" is not accompanied by objective criteria defining either the nature or the degree of the violation. The elucidation of Article 12(d) merely reiterates the statutory wording by stating that a serious violation consists of the failure to fulfil statutory duties and compliance with professional prohibitions, without providing any meaningful distinction between ordinary and serious violations. Consequently, the provision fails to function as a clear normative guideline for both Notaries and the Notary Supervisory Council (Bronica, 2025).

These findings reinforce Bronica's research, which concludes that the administrative sanction regime under the Law on Notarial Office lacks clear benchmarks for determining the



severity of violations committed by Notaries. Nevertheless, this study provides a more specific contribution than the previous research. While Bronica focuses on the absence of objective standards for all categories of administrative sanctions regulated under Article 85 of the Law on Notarial Office, this study identifies the primary source of legal uncertainty as the formulation of Article 12(d), which employs the term "serious violation" without providing an operational normative definition. Accordingly, this study not only confirms the existence of normative ambiguity but also identifies more precisely the source of the normative disharmony that leads to inconsistent sanctioning practices.

This ambiguity becomes even more apparent when Article 12(d) is compared with Article 9(d) of the Law on Notarial Office, which regulates temporary suspension for violations of statutory duties and professional prohibitions. Substantively, the object of violation under both provisions is nearly identical, whereas their legal consequences differ significantly. Temporary suspension allows a Notary to resume office upon completion of the sanction, whereas dishonourable dismissal permanently terminates the notarial office. The absence of objective parameters distinguishing these two provisions results in normative inconsistency and creates room for subjective interpretation by the Notary Supervisory Council when imposing sanctions (Rimadini, 2025).

From the perspective of legislative drafting theory, this condition reflects internal disharmony within the same statute. Provisions governing the same legal subject matter should establish a systematic and hierarchical relationship, ensuring that each category of sanction is supported by rational differentiating criteria. When Articles 9(d) and 12(d) regulate the same object of violation but prescribe substantially different legal consequences without measurable indicators, the principles of clarity of formulation (*lex certa*) and normative consistency are not fulfilled. As a consequence, the authority of the Supervisory Council shifts from merely applying legal norms to effectively creating them through case-by-case interpretation, even though such normative formulation falls exclusively within the competence of the legislature.

This problem is reflected in enforcement practice through the disparity of decisions issued by the Central Notary Supervisory Council. The present study finds that violations exhibiting similar characteristics may result in different sanctions, ranging from temporary suspension to dishonourable dismissal. Such disparity indicates that the assessment of what constitutes a "serious violation" depends more heavily on the interpretation of individual Supervisory Councils than on objective standards established by statute. Consequently, the principles of equality before the law and legal certainty cannot be fully realized because Notaries are unable to predict the legal consequences of their conduct (Saraswati, 2021).



The findings of this study also differ from those of Nilna Muna Yuliandari, whose research focuses on the legal remedies available to Notaries after a dishonourable dismissal through the State Administrative Court. That study proceeds from the assumption that legal disputes arise after the issuance of an administrative decision. In contrast, the present study demonstrates that the principal problem emerges prior to the issuance of the decision, namely at the legislative stage where the statutory norm fails to provide objective parameters for determining what constitutes a serious violation. In other words, judicial review before the State Administrative Court serves merely as a corrective mechanism, while the root cause of the problem remains the inadequate quality of the statutory norm underlying the administrative decision.

When analysed through the lens of legal certainty theory, Article 12(d) of the Law on Notarial Office fails to satisfy the essential elements of clarity, predictability, coherence, and consistency. From the perspective of clarity, the provision provides neither a definition nor concrete indicators of what constitutes a serious violation. In terms of predictability, Notaries cannot reasonably anticipate whether a particular violation will result in temporary suspension or dishonourable dismissal. Regarding coherence and consistency, Articles 9(d) and 12(d) do not establish a harmonious normative relationship because they regulate the same category of misconduct while imposing different legal consequences without clear distinguishing parameters. Consequently, the provision gives rise to a vague norm that is inconsistent with the principle of legal certainty as articulated by Moh. Fadli (Moh. Fadli & Sofyan Hadi, 2023).

Viewed from Moh. Fadli's theory of legal certainty, legal certainty is not merely the existence of written legal norms but also the capacity of those norms to produce legal consequences that can reasonably be predicted by every legal subject. Accordingly, although Article 12(d) of the Law on Notarial Office formally satisfies the principle of legality because it is enacted by statute, substantively it fails to fulfil its normative function because it does not provide uniform standards for either supervisory authorities or Notaries. This study therefore demonstrates that the principal issue lies not in the absence of regulation but in the inadequate quality of the statutory formulation, which fails to meet the standards of modern legal certainty.

From the perspective of legislative drafting, the provision also fails to comply with the principle of clarity of formulation as stipulated in Article 5(f) of Law Number 12 of 2011 on the Formulation of Laws and Regulations. Legal norms should be drafted systematically, avoid multiple interpretations, and establish a proportional relationship between prohibited conduct and the corresponding sanction. When a statutory provision merely employs the term "serious violation" without providing objectively verifiable criteria, the law fails to achieve its function as



an instrument of legal certainty. This condition also has the potential to diminish legal protection for Notaries because it grants excessively broad discretionary authority to the Supervisory Council.

This analysis demonstrates that normative ambiguity affects not only the individual interests of Notaries but also the legitimacy of the entire supervisory system governing the notarial profession. The broader the interpretative discretion granted to supervisory institutions without clear normative guidance, the greater the likelihood of inconsistent decisions and unequal treatment of comparable violations. Within a *rechtstaat*, such a condition is incompatible with the principles of legal certainty and legal protection because the imposition of administrative sanctions should be based upon objective legal standards rather than the subjective assessment of public officials.

Based on the overall analysis, it may be concluded that the regulation governing the dishonourable dismissal of Notaries for serious violations of their statutory duties and professional prohibitions has not fully satisfied the principle of legal certainty. The ambiguity of the statutory provision gives rise to multiple interpretations, inconsistent application of sanctions, and disparities in the decisions of the Notary Supervisory Council concerning similar violations. Accordingly, legislative reform is required to formulate objective indicators defining serious violations so that a proportional relationship exists between the nature of the violation and the corresponding sanction. Such reformulation would strengthen legal certainty, promote greater consistency in law enforcement, and provide more effective legal protection for both Notaries and the public as users of notarial services.

Reformulating the Legal Framework for the Dishonorable Dismissal of Notaries for Gross Violations of Official Duties and Statutory Prohibitions

The reformulation of the provisions governing the dishonorable dismissal of Notaries is a logical consequence of the ambiguity identified in Article 12(d) of the Law on Notarial Office, which fails to provide objective criteria for the phrase serious violation. The findings reveal that the current provision, which merely refers to "failure to perform official obligations and violation of official prohibitions," does not clearly distinguish ordinary violations under Article 9(d) of the Law on Notarial Office from serious violations that warrant dishonorable dismissal. Consequently, the imposition of sanctions largely depends on the discretionary interpretation of the Supervisory Council, creating the potential for inconsistent decisions in cases involving substantially similar violations. Accordingly, reformulation is necessary to uphold the principles of clarity of legal norms (*lex certa*), legal certainty, and proportionality within the administrative sanctions regime (Hadjon, 2005).



From a philosophical perspective, the proposed reformulation is grounded in the nature of the notarial office as an *officium nobile* a profession whose legitimacy derives from public trust. Such trust can only be maintained if the legal system is capable of proportionately distinguishing ordinary administrative violations from misconduct that genuinely undermines the integrity, honor, and dignity of the office. Therefore, the regulation of dishonorable dismissal should not merely employ the abstract term serious violation, but should also establish measurable indicators to ensure that legal protection is afforded not only to the public as users of notarial services, but also to Notaries as public officials entitled to legal certainty throughout disciplinary proceedings and the imposition of sanctions (Hadjon, 2005).

From a juridical perspective, this study finds that the reformulation should eliminate the normative inconsistency between Article 9(d) and Article 12(d) of the Law on Notarial Office. Both provisions impose sanctions based on violations of official obligations and prohibitions, yet prescribe different legal consequences without establishing any clear distinguishing criteria. This condition is inconsistent with the principle of clarity in legislative drafting as stipulated in Article 5(f) of Law Number 12 of 2011 on the Formulation of Laws and Regulations. A well drafted legal norm must be systematic, coherent, and capable of providing clear guidance for law enforcement authorities in its implementation, thereby minimizing the risk of subjective interpretation (Asshiddiqie, 2021). The reformulation proposed in this study seeks to eliminate such ambiguity by introducing concrete indicators for determining what constitutes a serious violation.

The sociological dimension further reinforces the urgency of this reformulation. The findings indicate that, in practice, various forms of notarial misconduct involving criminal elements, such as embezzlement and fraud, may substantially undermine the integrity of the office but do not necessarily result in dishonorable dismissal where the applicable criminal penalty fails to satisfy the requirements of Article 13 of the Law on Notarial Office. Decision Number 29/Pid.B/2020/PN Pwk and Decision Number 346/Pid.B/2015/PN Kpn demonstrate a discrepancy between the existing normative framework and society's expectations regarding legal protection. Accordingly, any revised legal framework should take into account the evolving realities of notarial practice in order to encompass conduct that demonstrably damages the honor of the profession, even where such conduct does not satisfy the criminal threshold prescribed by Article 13 of the Law on Notarial Office.

Based on this analysis, the study formulates three principal indicators for determining serious violations under Article 12(d) of the Law on Notarial Office. First, a Notary who commits another violation after having twice been subjected to temporary suspension based on final and binding disciplinary decisions. Second, a Notary who, by virtue of a final and binding court



judgment, is convicted of a criminal offense related to the performance of notarial duties carrying a statutory penalty of less than five years' imprisonment. Third, a violation of official obligations and/or prohibitions committed while the Notary is serving a period of temporary suspension. These indicators provide objective and measurable criteria for determining when misconduct should be classified as a serious violation, thereby limiting the discretionary interpretation that has long contributed to legal uncertainty.

The proposed reformulation also satisfies the essential elements of legal certainty adopted as the theoretical framework of this study. In terms of clarity, the revised provision provides an explicit definition of serious violations. In terms of predictability, every Notary is able to anticipate the legal consequences of particular conduct based on predetermined indicators. In terms of coherence, the relationship between Articles 9 and 12 of the Law on Notarial Office becomes more systematic through the establishment of a clear distinction between ordinary and serious violations. Finally, in terms of consistency, the existence of objective normative parameters is expected to promote uniformity in the application of disciplinary sanctions by the Notarial Supervisory Council, thereby reducing disparities in decisions involving comparable cases.

This study ultimately proposes a reformulation model for Article 12(d) of the Law on Notarial Office by replacing the abstract phrase serious violation with a legal norm containing concrete, objective, and measurable indicators that define the circumstances under which misconduct qualifies as a serious violation. This model constitutes an original contribution to the development of Indonesian notarial law because it not only resolves the problem of normative ambiguity (*vague norm*), but also establishes a disciplinary framework that is more proportionate, consistent, and legally certain. The proposed reformulation is expected to serve as a foundation for future amendments to the Law on Notarial Office, promote greater consistency in disciplinary decisions by the Notarial Supervisory Council, enhance legal protection for both the public and Notaries, and strengthen the integrity of the notarial profession as a public office within the Indonesian legal system.

4. CONCLUSION

Based on the findings of this study, it can be concluded that the regulation governing the dishonourable dismissal of a Notary for committing a serious violation of professional obligations and prohibitions, as stipulated in Article 12(d) of the Notary Office Law, continues to present legal certainty concerns. The principal issue does not lie in the dismissal procedure or the authority of the competent supervisory institutions, but rather in the absence of a normative definition of the term "serious violation." This lack of clear legal parameters causes the classification of violations



to depend largely on the interpretation of the Notary Supervisory Council, thereby creating the potential for inconsistent sanctions in cases involving similar factual circumstances. Consequently, the existing provision has not fully satisfied the principles of legal clarity, predictability, and consistency, which constitute essential elements of legal certainty.

This study proposes a normative reconstruction by formulating more objective, measurable, and proportionate indicators of serious violations as the legal basis for the dishonourable dismissal of a Notary. The original contribution of this research lies in developing normative indicators that can serve as objective benchmarks for distinguishing violations warranting temporary suspension from those justifying dishonourable dismissal. Accordingly, the legislature should revise Article 12(d) of the Notary Office Law, together with its elucidation, by explicitly incorporating a classification and objective indicators of serious violations to ensure greater uniformity in the application of the law. Furthermore, the Notary Supervisory Council should develop comprehensive assessment guidelines for determining what constitutes a serious violation, thereby providing a consistent reference for disciplinary examinations and the imposition of sanctions. Such measures would enhance objectivity, consistency, and accountability in disciplinary decision-making while strengthening legal protection for both Notaries and the public as users of notarial services..

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