

## **Legal Certainty in the Re-Norming of Article 66(1) of the Notary Law**

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### **ABSTRACT**

This study aims to evaluate the consistency of legal certainty and the constitutional implications resulting from the re-norming of the phrase "with the approval of the Notary Honorary Council" in Article 66 paragraph (1) of Law Number 2 of 2014 concerning the Amendment to the Notary Office Law. It specifically addresses whether reviving a mechanism previously declared unconstitutional under a renamed institution fulfills the constitutional guarantees of legal certainty and assesses its wider legal impacts on the national law enforcement process involving notary public officials. This research employs a normative legal research method (library research) focusing on the analysis of documented legal materials. The study utilizes a statutory approach and a conceptual approach, heavily grounded in the constitutional doctrines of judicial independence, equality before the law, and the classic theories of legal certainty developed by Hans Kelsen and Jan Michiel Otto. The primary legal materials examined include the 1945 Constitution, relevant notary position laws, and the Constitutional Court Decision Number 49/PUU-X/2012. The results indicate that, from the perspective of Jan Michiel Otto's theory of real legal certainty, the re-norming fails to establish just legal certainty due to severe normative inconsistencies, an absence of academic justification in legislative drafts, and a lack of parliamentary compliance toward final and binding judicial reviews. Juridically, by shifting extra-judicial administrative approval from the Regional Supervisory Council (MPD) to the Notary Honorary Council (MKN), the provision establishes a severe norm conflict that overrides standard criminal procedural mandates (KUHAP) and compromises judicial independence. Sociologically, empirical evidence demonstrates that this gatekeeping function operates as an aggressive institutional filter rather than an objective protection of confidentiality, significantly obstructing material truth-seeking, delaying judicial due process, and leading to high operational case termination rates by law enforcement agencies.

**Keywords:** Legal Certainty, Notary Honorary Council, Law Enforcement, Constitutional Court, Notary Public..

### **1. INTRODUCTION**

The office of the Notary is a branch of the legal profession whose appointment and dismissal are directly handled by the state. Notaries are positioned as public officers with specific functions and authorities in the field of contract law. This public authority is manifested in the provision of legal services to the community, specifically in creating authentic deeds that serve as perfect evidence for civil legal actions. Because of this significant role, notaries have a substantial responsibility in maintaining legal certainty and protecting the civil rights of the public.

Despite their position, notaries occasionally become involved in the judicial process. Law enforcement officers often face obstacles when summoning a notary or requesting copies of a deed's minuta (original document) for investigation purposes. This difficulty arises because Article 66 paragraph (1) of the Notary Office Law (UUJN) mandates that law enforcement must obtain



prior approval from the Notary Supervisory Council - which has now been replaced by the Notary Honorary Council (MKN)—before taking such actions. Without this approval, law enforcement lacks the legal basis to examine the notary or retrieve the necessary documents. This condition has led to several lawsuits against the MPD/MKN for refusing to grant investigation permits, as shown in the following table:

| NO | Case Number & Court                                              | Litigating Parties                                                        | Claims/Demands                                                                                                                                                 |
|----|------------------------------------------------------------------|---------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1  | Case No.140/Pdt.G/2012/PN. Kpn (Kepanjen District Court)         | Plaintiff: HR. Slamet Pamo Edji Raharjo.<br>Defendant: Notary Asrul Hakim | To declare the MPD's decision refusing to grant permission to investigate Notary Asrul Hakim as an unlawful act, and to order the Police to examine the notary |
| 2  | Case No.21/G/2017/PTUN.SBY (Surabaya State Administrative Court) | Plaintiff: Dr. Habib Adjie SH<br>Defendant: MKN Wilayah Jawa Timur        | To declare invalid and revoke the Defendant's Decree (SK) No: UM-MKNW-JATIM-0 1-17-03 dated 23-01-2017                                                         |

Historically, the phrase "with the approval of the Regional Supervisory Council (MPD)" in Article 66 paragraph (1) was subjected to a material review by the Constitutional Court (MK). Through Decision No. 49/PUU-X/2012, the MK ruled that this phrase was unconstitutional and lost its binding legal force, reasoning that it violated the principles of equal protection before the law and judicial independence. However, a few months later, the government and the parliament enacted Law No. 2 of 2014, which revived this exact mechanism by merely changing the approving institution to the Notary Honorary Council (MKN) [This re-norming process raises significant questions regarding legal certainty and its implications for law enforcement

Therefore, this study aims to answer two fundamental research questions: First, does the re-norming of the phrase "with the approval of the MKN" fulfill the principle of legal certainty guaranteed by Article 28D of the 1945 Constitution? Second, what are the legal implications of this norm on the law enforcement process involving Notary public officials?

## 2. RESEARCH METHOD

This research is a normative legal research (legal research) or library research. It focuses on examining documented legal materials to analyze how the law is understood and how it influences society. The study employs two primary approaches: the statutory approach and the conceptual approach. The conceptual approach relies on legal doctrines and theories, specifically the theory of legal certainty by Hans Kelsen and Jan Michiel Otto, the principle of equality before the law, and concepts surrounding the Notary profession

The legal materials used consist of primary legal materials, including the 1945 Constitution of the Republic of Indonesia, Law No. 30 of 2004 concerning the Position of Notary, Law No. 2 of 2014 concerning the Amendment to Law No. 30 of 2004 concerning the Position of Notary, Constitutional Court Decision No. 49/PUU-X/2012, and various official legislative drafts (*Naskah Akademik*). Secondary legal materials encompass legal journals, academic papers, theses, books, and legal dictionaries.

Data collection was conducted through a comprehensive literature review. The collected legal materials were analyzed using systematic interpretation and inductive reasoning to draw concrete conclusions regarding legal certainty and the legal implications of Article 66 paragraph (1) of the Law on the Position of Notary.

### **3. RESULTS AND DISCUSSION**

#### **The Re-norming of Article 66 Paragraph (1) and the Principle of Legal Certainty**

In analyzing whether the re-norming of the phrase "with the approval of the Notary Honorary Council" fulfills the principle of legal certainty, Jan Michiel Otto's concept of real legal certainty provides an appropriate analytical framework. According to Otto, legal certainty requires that legal rules be clear, consistent, accessible, and effectively implemented by state institutions. It also requires that judicial decisions be respected and faithfully executed by all branches of government.

The inclusion of an administrative approval mechanism in Law No. 2 of 2014 fails to satisfy these requirements because it creates a direct normative conflict with a binding Constitutional Court decision. Rather than strengthening legal certainty, the provision reintroduces legal uncertainty by allowing an administrative institution to exercise authority that had previously been declared unconstitutional.

The principal weakness of this re-norming lies in its inconsistency with Constitutional Court Decision No. 49/PUU-X/2012. In that landmark judgment, the Constitutional Court expressly held that requiring administrative approval before investigators, prosecutors, or judges could summon a notary or obtain the original deed (*minuta akta*) was unconstitutional. The Court reasoned that such a requirement undermined judicial independence and violated the constitutional principle of equality before the law.

Because Constitutional Court decisions possess **erga omnes** effect and are final and binding immediately upon pronouncement, the legislature was constitutionally obliged to remove the administrative approval requirement entirely. However, instead of complying with the Court's reasoning, the legislature reinstated substantially the same restriction by replacing the Regional



Supervisory Council (MPD) with the Notary Honorary Council (MKN). This legislative action demonstrates a failure to implement a binding constitutional judgment and raises serious concerns regarding the constitutional validity of the amended provision.

Furthermore, the legislative history of Law No. 2 of 2014 demonstrates a lack of adequate academic justification and institutional compliance during the law-making process. An examination of the official Academic Draft (*Naskah Akademik*) and legislative records indicates that neither the legislature nor the executive conducted a comprehensive constitutional analysis concerning the reasons underlying the Constitutional Court's annulment of the previous provision. Instead of addressing the constitutional deficiencies identified by the Court, the legislative discussions primarily focused on changing the supervisory institution from the MPD to the MKN without fundamentally reconsidering the constitutionality of the administrative approval mechanism itself.

Consequently, the amendment reflects only an institutional substitution rather than substantive legal reform. As a result, the revised Article 66 paragraph (1) continues to generate uncertainty regarding the balance between protecting the notarial profession and ensuring the effective administration of justice, thereby failing to fully realize the principle of legal certainty as articulated by Jan Michiel Otto.

### **Constitutional Implications for the Law Enforcement Process**

The legal policy established through the re-norming of Article 66 paragraph (1) generates significant juridical and sociological implications for Indonesia's legal system. From a juridical perspective, R. Soeroso's theory of legal consequences explains that every amendment to a legal norm inevitably alters existing legal conditions (*rechts toestand*) and legal relationships (*rechtsbetrekking*) within the legal order. In this context, the current formulation introduces an administrative approval mechanism that effectively modifies the ordinary procedures prescribed under the Indonesian Criminal Procedure Code (*Kitab Undang-Undang Hukum Acara Pidana* or KUHAP). Consequently, investigators, prosecutors, and judges must first obtain approval from the Notary Honorary Council (*Majelis Kehormatan Notaris* or MKN) before summoning a notary or obtaining the original deed (*minuta akta*), thereby making law enforcement dependent upon the discretion of a non-judicial administrative body.

This transfer of authority raises constitutional concerns regarding the principles of judicial independence and the doctrine of *lex superior derogat legi inferiori*. By positioning the MKN as the exclusive gatekeeper for criminal investigations involving notaries, Article 66 paragraph (1) places the administration of criminal justice under the control of a professional institution whose primary function is to protect the notarial profession. Such a mechanism potentially interferes with

the independence of criminal law enforcement agencies and creates an unnecessary overlap between administrative law and criminal procedural law. Moreover, where investigators proceed without obtaining the required approval, the legality of investigative measures may subsequently be challenged, thereby creating uncertainty in the criminal justice process.

From a sociological perspective, the approval mechanism has the potential to reduce the efficiency and effectiveness of criminal investigations. Empirical findings indicate that the MKN has frequently exercised its authority in a restrictive manner. Between 2016 and 2018, law enforcement authorities in the Malang region submitted 56 formal requests to summon notaries; however, the East Java Regional Notary Honorary Council (*MKN Wilayah Jawa Timur*) approved only eight requests while rejecting forty-eight. Such a high rejection rate significantly limits investigators' access to witness testimony and authentic documentary evidence, particularly in cases involving forged land deeds, fraudulent transactions, and other notarial disputes. As a result, investigations may experience substantial delays or, in certain cases, be terminated due to insufficient evidence.

Although the legislature justified Article 66 paragraph (1) as a mechanism to protect the notary's statutory duty of confidentiality (*verschoningsplicht* or *hak ingkar*), its practical implementation has generated concerns regarding the emergence of excessive professional immunity. Rather than functioning solely as a safeguard for professional confidentiality, the approval requirement may be perceived as granting notaries a privileged procedural position that is unavailable to other professions. This perception is difficult to reconcile with the constitutional principle of equality before the law, which requires that all citizens receive equal treatment within the legal system.

Furthermore, the statutory right of refusal (*hak ingkar*) already provides adequate legal protection for notaries during judicial proceedings. Accordingly, requiring prior administrative approval from the MKN before law enforcement authorities may exercise their investigative powers appears to impose an additional procedural obstacle that is not strictly necessary. Consequently, the current mechanism risks delaying the constitutional guarantee of due process of law, reducing the effectiveness of criminal law enforcement, and ultimately diminishing public confidence in the fairness and integrity of Indonesia's judicial system.

#### 4. CONCLUSION

Based on Jan Michiel Otto's theory of legal certainty, Article 66 paragraph (1) of the Law on the Position of Notary fails to satisfy the principle of legal certainty. The provision creates normative inconsistencies, demonstrates a lack of legislative compliance with binding

Constitutional Court decisions, and reintroduces an administrative approval mechanism that had previously been declared unconstitutional without providing sufficient constitutional or academic justification. Although Law No. 2 of 2014 replaced the Regional Supervisory Council (*Majelis Pengawas Daerah* or MPD) with the Notary Honorary Council (*Majelis Kehormatan Notaris* or MKN), the amendment did not eliminate the substantive constitutional defect identified by the Constitutional Court in Decision No. 49/PUU-X/2012. Consequently, the revised provision continues to undermine legal certainty and the supremacy of the Constitution.

Furthermore, the re-norming of Article 66 paragraph (1) produces significant constitutional implications for the Indonesian legal system. From a juridical perspective, the requirement to obtain prior approval from the MKN before summoning a notary or obtaining the original deed (*minuta akta*) creates a normative conflict between administrative procedures and the ordinary criminal justice process. This mechanism potentially interferes with judicial independence and complicates the exercise of investigative authority by law enforcement agencies. From a sociological perspective, although the provision aims to protect the confidentiality and professional integrity of notaries, its implementation may hinder criminal investigations, delay judicial proceedings, and obstruct the discovery of material truth. Such consequences ultimately weaken public confidence in the fairness and effectiveness of the legal system.

Accordingly, the legislature should revise Article 66 paragraph (1) in full compliance with Constitutional Court Decision No. 49/PUU-X/2012. Any future regulatory framework should continue to protect the professional responsibilities and confidentiality obligations of notaries while ensuring that such protection does not depend upon administrative approval mechanisms that impede law enforcement or compromise the constitutional principles of equality before the law, judicial independence, and legal certainty.

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