

## The Juridical Implications for Multiple Positions Performed by Land Deed Officials as State Officials in the Conception of Legal Certainty

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**Abstract.** *PPAT is a job that is independent, individual work, without a supervisor, trust work and requires strong morals because there are very few kinds of laws and regulations, in its implementation it is very vulnerable to various kinds of violations, one of which is concurrent positions. In practice, in practice, over time with the increasing number of people undergoing the PPAT profession from time to time, coupled with technological developments and the opportunity for some PPATs to get as many clients as possible, there are also PPATs who are difficult to get clients. This has made some PPAT individuals to carry out concurrent positions as advocates, become PPATs at the Notary's domicile, and as well as other professions. state officials. 1) knowing and analyzing the legal construction of concurrent positions carried out by the Land Deed Making Official as a state official. 2) Knowing and analyzing the juridical implications of concurrent positions carried out by Land Deed Maker Officials as state officials in the Conception of Legal Certainty. This research method uses normative juridical research, which is a deductive research that begins with an analysis of the articles in the laws and regulations governing the above problems. The specifications used in this study are descriptive analysis. Researchers used normative juridical specifications with primary and secondary data. The primary data used is obtained from binding sources in the form of laws and regulations. The data analysis method used descriptive-qualitative analysis. Based on the research conclusions: 1). Therefore, having multiple positions in the PPAT profession as a state official is allowed and some are not. Concurrent positions permitted by the PPAT position regulations are as follows: 1) PPAT concurrently serves as a notary at the Notary's domicile, Temporary PPAT concurrently serves as sub-district head or village head and Special PPAT concurrently serves as head of the land office. PPAT is prohibited from holding concurrent positions or professions as follows: Advocate, consultant or legal advisor; Civil servants, employees of state-owned enterprises, employees of regional-owned enterprises, private employees; State Officials or Government Employees with Work Agreements (PPPK); Leaders at schools, state universities, or private universities; Licensed surveyors; land appraisers; mediators; and/or other positions prohibited by laws and regulations.*

2). *The legal consequence of concurrent PPAT positions is a respectful dismissal by the Ministry.*

*Keywords: Concurrent; Deed; Position.*

## 1. Introduction

In this era of globalization, one of the characteristics that appears in the general public is the human desire to lead to an increasingly better standard of living. There are many ways that humans do so that the demands of their lives are fulfilled. Humans compete to get what they want in several ways, including individually or doing their own business and allying and utilizing other parties to achieve goals, one of which is by collaborating between interested parties by entering into an agreement.

The Indonesian nation is a nation that has a distinctive culture with regard to agreements made by interested parties. The principle of trust in one another is firmly embedded in the minds of the people when they enter into an agreement, this is evidenced by the binding of an agreement orally and witnessed by only a few witnesses. Over time, this culture can no longer be used as a guide in making agreements, because it has many weaknesses when there is a dispute between the parties involved and the object of the agreement in the future. To overcome this, it is necessary to have legal protection and certainty for the parties to the agreement.

The existence of a Land Deed Making Officer (PPAT) in Indonesia is very important for people's lives, because PPAT is a General Official who is authorized to make authentic deeds regarding certain legal actions regarding land rights or ownership rights to flats, the PPAT appointment is carried out by The government, in this case the National Land Agency, with certain duties and authorities in order to serve the needs of the community for deed of transfer of rights over land, deed of imposition of land rights, and deed of granting of power of attorney for imposition of mortgage rights as stipulated in the applicable laws and regulations.<sup>1</sup>

## 2. Research Methods

In this study the authors used the Normative Juridical Approach Method, which refers to legal norms contained in laws and regulations and court decisions as well as legal norms that exist in society.<sup>2</sup> This method is also used in order to be able to search the legal norms contained in the laws and regulations regarding the Prohibition of Multiple Positions for PPAT Officials, as well as obtain data and information contained in various literature in libraries, research journals, newspapers, magazines, internet sites and so on.<sup>3</sup>

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<sup>1</sup>Jimly Asshiddiqie, *Independence and Accountability of Land Deed Officials*, Jakarta: (June 2003 Edition of Renvoi Magazine), p. 31

<sup>2</sup>Zaimul Ali, *Legal Research Methods*, Jakarta: Sinar Graphic. 2009, p. 105.

<sup>3</sup>Sunaryati Hartono, *Legal Research in Indonesia at the End of the 20th Century*, Bandung: Alumni, 1994, p. 139.

### **3. Results and Discussion**

#### **3.1. Legal arrangements for PPATs who carry out concurrent positions as state officials**

A person's behavior is packaged in habits or habits that we consciously or unconsciously carry out every day and are intertwined in three dimensions, namely knowledge, skill, and desire.<sup>4</sup>Furthermore, Covey said that even if we know that in order to interact with others effectively we have to listen to other people.<sup>5</sup>However, perhaps we don't have the ability to do so or we don't know how to listen to others. To form a habit or habit, we must activate these three dimensions through a process that is motivated to achieve certain higher goals with a will based on what we want now and then. Starting with Habits or habits which if done continuously will become a character.

PPAT is an official who is authorized to make deeds rather than agreements that intend to transfer land rights, give a new right to land, mortgage land or guarantee money with land rights as dependents.<sup>6</sup>

Government Regulation Number 24 of 2016 concerning Amendments to Government Regulation Number 37 of 1998 concerning Position Regulations for PPAT Land Deed Deed Officials (hereinafter referred to as Government Regulations regarding PPAT Position Regulations) is meant as a general official who is authorized to make authentic deeds regarding certain legal actions regarding land rights or the Rights of the Official Making Land Deeds, hereinafter referred to as PPAT, are public officials who are authorized to make authentic deeds regarding certain legal actions regarding land rights or Ownership Rights over Flat Units.

The PPAT has the main task of carrying out some of the land registration activities by making deeds as proof that certain legal actions have been taken regarding land rights or ownership rights to flats which will be used as the basis for registering changes to land registration data resulting from said legal action. The legal actions referred to in paragraph (1) are as follows:

- a. buy and sell;
- b. exchange;
- c. grant;

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<sup>4</sup>Stephen R. Covey, 2015, *The Seven Habits of Highly Effective People*, quoted from Herlien Budiono, *Collection of Civil Law Writings in the Notary Sector; Third Book, First Printing* (Bandung: PT. Citra Aditya Bakti), p. 145.

<sup>5</sup>Ibid.

<sup>6</sup>Effendi *Fighting the wind*. (2007). *Agrarian Law in Indonesia An Examination from the Perspective of a Legal Practitioner*. Jakarta : Rajawali Press, 2007. p. 436.

- d. entry into the company (inbreng);
- e. distribution of joint rights;
- f. the granting of building use rights/usage rights over land with ownership rights;
- g. granting Mortgage Right;
- h. power of attorney imposes Mortgage Right.

Land Deed Making Officials who in carrying out their duties must follow the rules and regulations that apply according to laws and regulations, as well as provisions and instructions given by the minister or appointed official, if the Land Deed Making Official commits a violation, administrative action will be taken in the form of a warning in writing until dismissal from his position as a Land Deed Making Officer, without reducing the possibility of being sued for compensation by the parties who suffer losses resulting from the neglect of these provisions.

Article 67 paragraph (1) of the Notary Office Law stipulates that the Minister shall supervise the Notary. In carrying out this supervision, the Minister forms a Supervisory Board (Article 67 paragraph (2) of the Law on the position of notary public. 84 Likewise with the IPPAT and its fittings, namely the Branch Honorary Council, Regional Honorary Council, and the Central Honorary Council which is the organizational forum for the Association of Deed Making Officers Land that has been delegated authority from the relevant official, namely the Head of the National Land Agency The enforcement of discipline in the Association of Deed Making Officials carried out by the IPPAT Honorary Council is inseparable from the rules of the PPAT Code of Ethics Article 10, Article 11 and Article 13.

The PPAT Code of Ethics, hereinafter referred to as the Code of Ethics, are all moral principles determined by the association based on a decision of the Congress and/or determined by and regulated in the laws and regulations governing this matter and which apply to and must be obeyed by members of the IPPAT association and everyone who carries out the duties of a position as a PPAT, including the Substitute PPAT.<sup>7</sup>

Article 10 of the IPPAT Code of Ethics regulations stipulates that the mechanism for imposing administrative sanctions for violations made by a Land Deed Official:

1. The examination is carried out by the Regional Ethics Council and is closed to the public.

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<sup>7</sup> <https://www.Hukumonline.com/klinik/a/perbedaan-kode-etik-notaris-dengan-ppat-lt509f7875153dc>, accessed on August 2, 2022, at 08.18 WIB.

2. Inspection is carried out no later than 7 (seven) calendar days after the report is received
3. The Regional Ethics Council must have completed the inspection and submitted the results of the inspection within a period of no later than 30 (thirty) calendar days from the receipt of the report.
4. The results of the examination are set forth in the examination program file signed by the chairperson and secretary.
5. Cover letter for sending the minutes of inspection sent to the complainant, the reported party, the Central Ethics Council, and the IPPAT regional administrators.
6. At the first meeting determined by the complainant and the reported were present, then the Regional Ethics Council conducted an examination by reading the report and hearing the report's statement.

Administrative sanctions, among others, are regulated in Law Number 4 of 1996 concerning Mortgage Rights on Land and Objects Related to Land.<sup>8</sup>

1. Article 23 paragraph (1) "Officials who violate or are negligent in fulfilling the provisions referred to in Article 11 paragraph (1), Article 13 paragraph (2) and Article 15 paragraph (1) of this law and/or its implementing regulations may subject to administrative sanctions in the form of: verbal warning, written warning and temporary dismissal from office.

2. Article 11 paragraph (1) "in the Deed of Granting Mortgage must include:

a. Name and identity of the holder and giver of Mortgage Right;

b. The domicile of the parties referred to in number 1 and if among them there is a preferred domicile outside Indonesia, and in the event that the preferred domicile is not stated, the office of the Land Deed Making Official where the Mortgage Deed Is made is considered the chosen domicile;

c. Clear designation of guaranteed debts or debts as referred to in Article 3 and Article 10 paragraph (1); 4) The amount of dependents; and

If in carrying out its main tasks it does not carry out the provisions as stipulated in the regulations above, the PPAT can be classified as having violated the provisions of the

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<sup>8</sup>Habib Adjie, Menopong Khazanah Notary and PPAT Indonesia (Collection of Notary and PPAT Writings), (Bandung: Citra Aditya, 2009), p. 255.

laws and regulations and can be given sanctions as stipulated in the regulations regarding the right of responsibility.

Prohibitions or violations that can be carried out by the PPAT, in carrying out their duties in more detail can be described as follows:

a. Serious violations include:

- 1) Helping to commit an evil conspiracy that resulted land disputes or conflicts;
- 2) Make a deed as a conspiracy that results in land disputes or conflicts;
- 3) Making deeds outside the working area except for those referred to in Articles 4 and 6 paragraph (3) of Government Regulation Number 37 of 1998 concerning Regulations for Officials Making Land Deeds;
- 4) Providing incorrect information in the deed which results in land disputes or conflicts;
- 5) Open a branch or representative office or other form located outside and or within the working area as referred to in Article 46; Violating the oath of office as a PPAT;
- 6) Drawing up of a PPAT deed which is carried out, while it is known by the PPAT concerned that the parties authorized to carry out legal actions or their proxies in accordance with statutory regulations are not present before them;
- 7) Making a deed regarding land rights or ownership rights to an apartment unit which the PPAT concerned is known to be still in dispute which results in the appearer concerned not having the right to take legal action as evidenced by the deed;
- 8) PPAT does not read the deed before the parties or parties who have not or are not authorized to take legal action according to the deed he made;
- 9) PPAT makes a deed before parties who are not authorized to take legal action according to the deed he made;
- 10). The PPAT draws up a deed during the period of being subject to a temporary dismissal sanction or while on leave;
- 11) Others determined by the Head of Agency.<sup>9</sup>

b. Minor violations include:

- 1) Collecting service fees exceeding the provisions of laws and regulations;
- 2) Within 2 (two) months after the end of the leave does not carry out his duties again;
- 3) Not submitting a monthly report regarding the deed he made;
- 4) Concurrent positions.

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<sup>9</sup>Djuhaedah Hasan, Study of Land Regulations, (Jakarta,

The concurrent positions permitted by the PPAT position regulations are as follows:

- a) PPAT concurrently serves as a notary at the notary's domicile.
- b) Temporary PPAT concurrently serves as district head or village head.
- c) Special PPAT concurrently holds the position of head of the land office.

In addition to positions that are allowed to hold concurrent positions, PP No. 24 of 2016 states that PPAT is prohibited from holding concurrent positions or professions as follows:

- a. Advocate, consultant or legal adviser;
- b. Civil servants, employees of state-owned enterprises, employees of regional-owned enterprises, private employees;
- c. State Officials or Government Employees with Employment Agreements (PPPK);
- d. Leaders at schools, public universities, or private universities;
- e. Licensed surveyor;
- f. land appraiser;
- g. Mediators; and/or
- h. Other positions that are prohibited by laws and regulations.

Based on the description above, concurrent positions in the PPAT profession as state officials are permitted and some are not. The concurrent positions permitted by the PPAT position regulations are as follows: PPAT concurrently serves as a notary at the Notary's place of residence, Temporary PPAT concurrently serves as sub-district head or village head and Special PPAT concurrently serves as head of the land office. PPATs are prohibited from holding the following positions or professions: Advocate, consultant or legal adviser; Civil servants, employees of state-owned enterprises, employees of regional-owned enterprises, private employees; State Officials or Government Employees with Employment Agreements (PPPK); Leaders at schools, public universities, or private universities; Licensed surveyor; land appraiser; Mediators;

Concurrent positions in the PPAT profession can lead to a conflict of interest when acting in his position as a PPAT based on the theory of legal certainty as one of the goals of law, which can be said to be part of an effort to achieve justice. The real form of legal certainty is the implementation or law enforcement of an action regardless of who does it. Legal certainty can predict what will be experienced if you take certain legal actions.

Certainty is needed to realize the principle of equality before the law without discrimination.

### **3.2. The legal consequences of concurrent positions carried out by officials who make land deeds as state officials in the concept of legal certainty**

Land Deed Making Officer, hereinafter referred to as PPAT, is a public official who is authorized to make authentic deeds regarding certain legal actions regarding land rights or ownership rights to flat units. The requirements for being appointed as a PPAT are:

1. Indonesian citizens;
2. the lowest age is 22 (twenty two) years;
3. good behavior as stated by a certificate made by the local police agency;
4. have never been sentenced to imprisonment based on a court decision that has obtained permanent legal force because of committing a crime punishable by imprisonment of 5 (five) years or more;
5. physically and mentally healthy;
6. hold a bachelor's degree in law and graduate from a notary degree or postgraduate PPAT special education program organized by the ministry administering agrarian/land government affairs;
7. Pass the exam held by the ministry administering government affairs in the agrarian/land sector; and
8. have undergone an apprenticeship or have actually been different as employees at the PPAT office for at least 1 (one) year, after graduating from notary education.

PPAT is prohibited from having concurrent positions or professions:

- i. advocate, consultant or legal adviser;
- ii. civil servants, employees of state-owned enterprises, employees of regional-owned enterprises, private employees;
- iii. state officials or Government Employees with Employment Agreements (PPPK)
- iv. leaders at schools, public universities, or private universities
- v. licensed surveyor;



- vi. land appraiser;
- vii. mediators;
- viii. and/or other positions that are prohibited by laws and regulations.

A PPAT who holds concurrent positions as a consultant or legal adviser must choose a position as a PPAT or legal consultant/advisor within 3 (three) months after this Government Regulation comes into effect, with the provision that if within that period the choice is not made then he will be dismissed from his position as PPAT . Termination of the PPAT is carried out with a Ministerial Decree.

PPAT is dismissed with honor, because:

- a. own request;
- b. no longer able to carry out their duties due to the state of their physical or mental health, after being declared by the authorized health examiner team at the request of the Minister/Head or appointed official;
- c. holding concurrent positions as referred to in Article 7;
- d. declared bankrupt based on a court decision that has obtained permanent legal force and/or
- e. being under continuous supervision for more than 3 (three) years.

PPATs who in carrying out their duties are required to follow the rules, provisions as referred to in Article 38, Article 39 and Article 40 (Government Regulation Number 24 of 1997 concerning Land Registration), as well as provisions and instructions given by the minister or appointed official are subject to administrative action in the form of a written warning up to dismissal from his position as a PPAT, without reducing the possibility of being sued for compensation by parties who suffer losses resulting from the neglect of these provisions (Article 62 of Government Regulation Number 24 of 1997 concerning Land Registration).<sup>10</sup>

The PPAT position regulations (Article 10 Government Regulation No. 37 of 1998 Juncto Regulation of the Head of the National Land Agency Number 1 of 2006) explains that there are two classifications of dismissal from the PPAT position, honorably dismissed and dishonorably discharged.

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<sup>10</sup>Ibid., p. 38.

PPAT was honorably dismissed from his position due to:

- 1) own request;
- 2) No longer able to carry out their duties due to the state of their physical or mental health, after being declared by the authorized health examiner team at the request of the minister or appointed official
- 3) Committing a minor violation of the prohibition or obligation as a PPAT;
- 4) Appointed as a civil servant or ABRI.<sup>11</sup>

While the PPAT was dishonorably dismissed from his position, because:

- a) Committing a serious violation of the prohibition or obligation as a PPAT;
- b) Sentenced to confinement/prison for committing a crime which is punishable by imprisonment or imprisonment for a maximum of 5 (five) years or more based on a court decision that has obtained permanent legal force.<sup>12</sup>

Violations committed by the PPAT may be subject to sanctions in the form of administrative sanctions or criminal sanctions. The imposition of sanctions on the PPAT takes into account the provisions of the existing laws and regulations as well as the violations committed by the PPAT.

Article 7 of the Code of Ethics for the Association of Land Deed Officials (IPPAT) states that supervision over the implementation of this code of ethics is carried out in the following manner:

1. At the first level by the Regional Board of IPPAT and the Regional Ethics Council together with branch officials and all members;
2. At the last level by the Central Board of IPPAT and the Central Honorary Council.

Regarding the sanctions that can be imposed on PPATs, they are also stipulated in Article 6 paragraph (1) of the PPAT Code of Ethics, namely members who violate the code of ethics may be subject to sanctions in the form of:

- (1) reprimand;

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<sup>11</sup>Ibid.

<sup>12</sup>Ibid., p. 45

- (2) Warning;
- (3) Schorsing (temporary dismissal) from IPPAT membership;
- (4) Onzetting (dismissal) from IPPAT membership;
- (5) Dishonorable termination of IPPAT membership.

Article 10 of the IPPAT Code of Ethics regulations stipulates that the mechanism for imposing administrative sanctions for violations made by a Land Deed Official:

(a) The examination is carried out by the Regional Ethics Council and is closed to the public.

(b) Inspection is carried out no later than 7 (seven) calendar days after the report is received.

(c) The Regional Ethics Council must have completed the inspection and submitted the results of the inspection within a period of no later than 30 (thirty) calendar days from the receipt of the report.

(d) The results of the examination are set forth in the examination program file signed by the chairperson and secretary.

(e) Cover letter for sending the minutes of inspection sent to the complainant, the reported party, the Central Ethics Council, and the IPPAT regional administrators.

(f) At the first hearing, the reporting party was determined and the reported party was present, then the Regional Ethics Council conducted an examination by reading the report and hearing the report's statement.

(g) During the examination, the reported party was given sufficient opportunity to provide a response.

(h) The complainant and the reported party can submit evidence to support the arguments put forward.

Provisions of Article 10 of the IPPAT Code of Ethics Regulation Stage Examination by the Honorary Council of the Central Association of Officials Making Land Deeds:

- i. The Central Honorary Council examines an appeal against the decision of the Regional Honorary Council.
- ii. If the arguments put forward in the appeal memory are considered sufficiently reasonable by the Central Ethics Council, the decision of the Regional Ethics Council is annulled.
- iii. If the arguments put forward in the appeal memory are deemed baseless by the

Central Ethics Council, then the MPW's decision is upheld.

- iv. The Central Honor Council can make its own decisions based on discretion and fairness.
- v. The Central Honorary Council shall begin examining the appeal application file within a period of 7 (seven) calendar days from the date the file is received.
- vi. The Central Honorary Council has the authority to summon the complainant and the reported party for examination in order to hear their statement.
- vii. The decision is pronounced within a maximum period of 30 (thirty) calendar days after the file is received and signed by the chairman, members and secretary of the Central Honorary Council.
- viii. The decision of the Central Honor Council is submitted to the minister, and a copy is submitted to the complainant, the reported party, the Regional Honor Council, the Central Management Association of Land Deed Making Officials, within a period of no later than 30 (thirty) calendar days from the date the decision is pronounced.

The mechanism for the dismissal process due to violations committed by the PPAT in carrying out their duties is regulated in detail in the Code of Ethics for the Association of Land Deed Making Officials. It should be an important note that the code of ethics is actually in the hands of professional organizations to enact and enforce it, professional codes of ethics are not the same as legal laws, a professional expert who violates the professional code of ethics receives sanctions and or fines from the main professional organization.

Violations of laws and regulations are judged/tried by competent judicial institutions, such as District Courts (PN), Religious Courts (PA), State Administrative Courts and vertical bodies such as departmental institutions (Ministry) and non-departmental institutions such as the Republic of Indonesia's National Defense.

Concurrent positions have the potential to create a conflict of interest for the PPAT, bearing in mind PP NO 24 of 2016 concerning PPAT Position Regulations in article 7 which states the prohibition of PPAT holding multiple positions. A PPAT who holds concurrent positions can cause a conflict of interest when acting in his position as a PPAT, this problem shows the connection between the theory of the working of law that the working of law in society can be seen from two sides, namely the dogmatic side and the sociological side. From a dogmatic point of view, where the operation of the law is connected with the problem of applying the law, interpreting the law, making legal constructions and so on. From a sociological point of view, the operation of law can be seen from the role of humans as intermediaries for entry into a society. Humans as actors who carry law in society result in the law being affected by the subjectivity of the

humans themselves. Law is no longer seen as something autonomous and objective, but something subjective and heterogeneous.

The operation of law in society is influenced by various factors. These factors include the community itself. Communities as role holders are expected to be able to act in accordance with existing regulations, which have given instructions to them. Meanwhile, the institutions that make rules and apply sanctions act more as controllers and at the same time respond to these functions and rules.

Legal consequences for PPATs who carry out multiple positions based on Government Regulations concerning PPAT Position Regulations, PPATs will be subject to administrative sanctions or dismissal by the Minister. If a PPAT deed is proven to violate laws and regulations and is legally flawed, the deed becomes null and void or can be cancelled.

#### **4. Conclusion**

The prohibition of concurrent PPAT positions is contained in article 7 PP No. 26 of 2016. PPATs are prohibited from holding multiple positions, because concurrent positions in the PPAT profession can cause a conflict of interest when acting in their position as PPAT. PPATs are prohibited from holding the following positions or professions: Advocate, consultant or legal adviser; Civil servants, employees of state-owned enterprises, employees of regional-owned enterprises, private employees; State Officials or Government Employees with Employment Agreements (PPPK); Leaders at schools, public universities, or private universities; Licensed surveyor; land appraiser; Mediators; and/or other positions that are prohibited by laws and regulations.

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##### *Regulation:*

- [1] Government Regulation Number. 24 of 1997 concerning Land Registration.

- [2] Government Regulation Number. 37 of 1998 concerning the Position of Official for Making Land Deeds.
- [3] Regulation of the Head of the National Land Agency of the Republic of Indonesia Number 3 of 1997 concerning Regulations for Implementing Government Regulation Number 24 of 1997 concerning Land Registration.
- [4] Regulation of the Head of the National Land Agency of the Republic of Indonesia Number 1 of 2006 concerning Provisions for the Implementation of Government Regulation Number 37 of 1998 concerning the Position of Land Deed Making Officer.
- [5] Regulations of the Code of Ethics of the Association of Land Deed Officials.

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