Unlawful Acts In The Criminal Offense Of Document Forgery

Gatot Efrianto[1], **Sabela Gayo**[2], **Abraham Quadan**[3]

[1,2]Universitas Bhayangkara Jakarta Raya, Indonesia, [3]Mediator, Options Mediation, Australia

gatot.efrianto@dsn.ubharajaya.ac.id[1], sabela.gayo@dsn.ubharajaya.ac.id[2], abe@optionsmediation.com.au[3]

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Abstract

The Unitary State of Indonesia consists of diverse ethnic groups and customary laws, governed under a sovereign legal framework to ensure the proper enforcement of regulations. As stipulated in Article 1 paragraph (3) of the 1945 Constitution of the Republic of Indonesia (UUD 1945), "The State of Indonesia is a state based on law," emphasizing that every individual who commits a criminal act must be held accountable according to applicable laws. However, various legal challenges continue to arise, especially amid rapid modernization and technological advancement, leading to new forms of criminal acts previously unknown, such as document forgery involving authentic deeds. An authentic deed is an official document prepared by or before a competent public official, serving as strong and binding evidence in legal proceedings as stated in Article 1870 of the Indonesian Civil Code (KUHPerdata). Given its probative value, authentic deeds hold a crucial role in legal certainty and public trust. Nevertheless, the increasing occurrence of forgery cases undermines the credibility of these documents and challenges the integrity of Indonesia's legal system. Therefore, this study aims to analyze the legal implications and accountability mechanisms for the forgery of authentic deeds, emphasizing the need for stronger preventive regulations, stricter law enforcement, and enhanced oversight to uphold justice and protect the authenticity of legal instruments in Indonesia.

I. Introduction

The issue of forgery of deeds or documents has become increasingly prevalent today, with numerous cases concerning the forgery of documents classified as authentic deeds. One case that has recently gained wide public attention in Indonesia concerns allegations regarding the bachelor's degree (S1) diploma of a former President of the Republic of Indonesia. He was accused by a politician and several public figures of possessing a

falsified diploma. These allegations directed at the former president, commonly known as Jokowi, have sparked debates not only among activists but also within the general public.

In matters of document forgery, the state cannot impose criminal penalties on perpetrators if there is no statutory provision regulating such conduct. This is in accordance with the principle of legality, which stipulates that no act may be punished unless it has been prescribed by law. Accordingly, anyone who violates a prohibition that is explicitly set forth in law may be subject to sanctions or punishment, and criminal liability is imposed on those who cause the unlawful act and share a direct connection to it (Gatot Efrianto, Danu Rahmana, 2024).

Therefore, the State of Indonesia regulates the criminal offense of document forgery in Articles 263 through 276 of the Indonesian Criminal Code (KUHP). These articles enumerate and define the offenses related to document forgery. The regulation of document forgery aims to preserve the integrity of official documents in Indonesia, to prevent acts of fraud, and to uphold justice in the Republic. The issue of forgery is not limited to the allegations regarding the former president's diploma. For instance, in 2015, the Election Supervisory Agency (Bawaslu) discovered suspected use of falsified diplomas during the registration of regional head candidates in Central Sulawesi Province.

This study aims to: analyze the legal basis and regulation of criminal acts of document forgery in Indonesia, especially as stipulated in Article 263 to Article 276 of the Criminal Code (KUHP), identify the form and characteristics of document forgery classified as authentic deeds, as well as examine the legal elements that distinguish between authentic deeds and ordinary documents in the context of legal evidence, assess, including parties directly or indirectly involved in the act, assessing the social and legal impact of the rampant cases of document forgery in Indonesia, such as in the case of alleged forgery of diplomas, on public trust in legal institutions and state officials and formulating strategic steps to strengthen law enforcement and Prevention of criminal acts of document forgery, in order to maintain the authenticity of authentic deeds and ensure legal certainty in Indonesia.

This paper, therefore, will discuss violations of criminal acts concerning documents, particularly those classified as authentic deeds

2. Research Method

In this journal, the author conducts legal research, which is a type of study that has a legal object, whether law as a science or rules that are dogmatic in nature, or law related to social behaviour and community life (Jonaedi Efendi dan Johnny Ibrahim, 2016). Legal research, in essence, is a scientific activity based on specific methods, systematic approaches, and particular lines of reasoning, aimed at studying one or several legal

phenomena through analysis. This involves conducting an in-depth examination of legal facts and seeking solutions to the problems arising from the legal phenomena under investigation (Sunggono Bambang, 2013).

The research employs secondary data as the primary source of information. Secondary data refers to literature studies, including statutory regulations, various written sources, and analyses of court decisions, which serve as sources for observing the practical application of provisions regulating the criminal act of document forgery.

The statute approach is conducted by examining all laws and regulations relevant to the legal issue under study.This approach involves reviewing legislation related to the matter being discussed. The statute approach is useful as it provides researchers the opportunity to study the consistency and conformity between one law and another, or between a law and the Constitution. The results of this review serve as a basis for arguments aimed at resolving the legal issues encountered (Dyah Ochtoria Susanti dan A'am Efendi, 2015).

The analytical approach involves understanding the meaning contained in the terms used in legal regulations conceptually, as well as examining their application in practice and legal decisions. This is carried out through two examinations. First, the researcher seeks to obtain new interpretations contained within the relevant legal provisions. Second, the researcher examines these legal terms in practice through analysis of court decisions (Johnny Ibrahim, 2012).

3. Results and Discussion

The Narcotics Criminal Case with Defendant Benny Tanjung als Beny began on Thursday, March 20, 2025, at around 01.00 WIB. At that time, the police officers of the Belawan Port Police were observing in the Titi Papan Village, Medan Deli District, Medan City. Based on information from the public, it is known that there is abuse of narcotics types of methamphetamine on Jalan Platina 1 neighborhood 09, Titi Papan Village. Following up on the report, officers then conducted an investigation and found the defendant was at the location with suspicious movements. Officers immediately arrested and searched the accused. From the results of the search found evidence in the form of: 1 (one) plastic clip containing methamphetamine in a black bag belonging to the defendant, cash amounting to Rp85, 000.00 which is the result of the sale of narcotics and 1 (one) plastic clip of methamphetamine hidden in the socks of the defendant.

As stated in the *Kamus Besar Bahasa Indonesia* (Indonesian Dictionary), a letter is defined as "paper and the like that is written on (with various contents and purposes)." Letters serve various functions according to their types and are often used for multiple purposes. In addition to ordinary letters, there are also documents commonly referred to as authentic deeds.

In civil dispute resolution, the types of evidence include documentary evidence, witness testimony, presumptions, confessions, and oaths, as stipulated in Article 164 HIR or Article 284 Rbg. Documentary evidence can serve as the primary evidence in civil disputes, since, in principle, proof seeks formal truth, although in practice, both inside and outside court,

there is no prohibition against seeking material truth. In criminal law, valid evidence consists of witness testimony, expert testimony, documents, indications, and statements from the defendant, as regulated in Article 184 of the Indonesian Criminal Procedure Code (KUHAP). Thus, documents are a primary element in resolving legal cases or events, while the arguments presented by the parties are of little value unless supported by comprehensive evidence that substantiates their claims during their respective defenses.

The concept of unlawful itself is explained by Simons as follows: *"What meaning should be given to the term unlawful acts in these provisions? According to the common view, the term simply means 'without one's own right.' In my opinion, only one view is acceptable regarding unlawful acts, which is that there exists behavior that is contrary to the law. 'Without right' has a different meaning than 'contrary to the law,' and the term unlawful refers only to the latter meaning. The law addressed by the act need not be a subjective right but may also be a general right. Which interpretation is correct depends on the nature of the criminal act and the legislative formulation of the term."*One of the main elements of an objective criminal act is the unlawful nature of the conduct. This is linked to the principle of legality implied in Article 1 paragraph 1 of the Indonesian Criminal Code (KUHP). In Dutch, unlawful acts are referred to as *wederrechtelijk* (*weder*: contrary to, against; *recht*: law). In determining whether an act can be criminalized, legislators include the unlawful nature as a written element. Without this element, statutory formulations would be excessively broad. Additionally, culpable conduct is sometimes included in the formulation of the offense, as in the case of a *delik culpa* (negligent offense), (Gatot Efrianto, 2025).

Forgery is a type of violation against truth and trust, carried out with the aim of obtaining benefits for oneself or for others. A well-ordered social life in an advanced and organized society cannot endure for long without guarantees of the truthfulness of certain documents and written evidence. Therefore, acts of forgery pose a threat to the continuity and stability of such a society.Humans are created to live in communities, and within social life there exists a sense of mutual dependence. Social life entails habits, aspirations, norms, values, needs, and other aspects. All of these can function properly when there is a balanced understanding of the social conditions of each individual. However, this balance can be disrupted if the society faces threats, one of which is criminal acts such as forgery.
Forgery is a criminal act that contains elements of falsity or untruth regarding an object, whereby something outwardly appears to be genuine but in reality contradicts the truth. Forgery can be punishable when it constitutes a violation of trust or guarantees, under the following conditions:

1) The perpetrator has the intent or purpose of using an inauthentic item by presenting it as genuine or using a false item as though it were original, thereby causing others to believe in its authenticity and consequently be deceived.
2) The element of intent or purpose does not necessarily require the motive of obtaining benefits for oneself or others (which distinguishes forgery from various forms of fraud).
3) However, the act must create a particular public danger. In cases of forgery of writings or documents, this is formulated by requiring the *possibility of loss* in relation to the nature of the writing or document concerned.

A documentencompasses all forms of writing, whether handwritten, typed, or printed, with meaningful content. Although the Indonesian Criminal Code (KUHP) does not provide an explicit definition of the term *document*, by examining the formulation of Article 263 paragraph (1) of the KUHP, the meaning of the term can be understood. Article 263 paragraph (1) KUHP states:*"Whoever creates a false document or falsifies a document that may give rise to a right, an agreement (obligation), or a discharge of debt, or which may be used as evidence of any act, with the intent to use or cause another person to use such document as if it were genuine and unaltered, thereby potentially causing loss, shall be punished for document forgery with imprisonment for a maximum of six years."*
In the Criminal Code (KUHP), it is not specified whether a documentmust be written on paper, cloth, or stone. What is clarified is only the form of the writing, namely that the document may be handwritten or printed using a printing machine. However, by considering the examples put forward by R. Soesilo, such as birth certificates, postal savings books, cash books, ship logbooks, transport letters, and bondsit can be concluded that what is meant by *document* in the KUHP is writing inscribed on paper that has a legal purpose, namely, to establish or extinguish rights.

The Crime of Document Forgery

Forgery can be defined as an act aimed at imitating or creating an object that is no longer genuine, or at rendering an object invalid. In the same way, forgery of documents may occur with respect to part or all of the document's contents, including the signature of the document's creator.

The principal distinction between *creating a false document*and *falsifying a document* lies in the fact that, in creating a false document, no such document exists beforehand; it is then produced with content that is wholly or partly contrary to the truth or false. The entire writing contained in the document is the result of the act of producing a false document. Such a document is referred to as a forged or inauthentic document.

To create a false document means to produce a documentwhether in its entirety, its content, or its signaturethat falsely represents itself as originating from another person whose name appears at the bottom at the time of its issuance. In other words, the document initially does not exist, but then comes into being, and the perpetrator creates content or signatures that are untrue (Gatot Efrianto, 2025).

Authentic Deed

Article 1868 of the Indonesian Civil Code stipulates that *"An authentic deed is a deed made in the form prescribed by law, by or before a public official authorized for that purpose, at the place where the deed is made."*

Irawan Soerodjo also states that there are three essential elements to fulfill the formal requirements of an authentic deed, namely:

1) It must be in the form prescribed by law;
2) It must be made by and before a Public Official;
3) A deed made by or before a Public Official who is authorized to do so and at the place where the deed is made (Irawan Soerodjo, 2002).

Regarding the elements of an authentic deed as mentioned above, there are functions for the parties concerned in the making of a deed. The functions of an authentic deed include:

1) As evidence that the parties concerned have entered into a certain agreement.
2) As evidence for the parties that what is written in the agreement represents their intent and desire.
3) As evidence to third parties that, on a certain date (unless otherwise stipulated by the parties), an agreement has been made and that the content of the agreement corresponds to the will of the parties.

In this regard, an authentic deed holds a strong legal position as it is regulated by statute and constitutes a powerful means of evidence when presented before a court of law. An authentic deed serves as conclusive proof between the parties who have executed it, and the evidentiary value of such a deed has been expressly affirmed in Article 1870 of the Indonesian Civil Code. By contrast, a private deed or a deed executed outside the framework of an authentic deed refers to a document signed privately, or in other words, an agreement made between the parties without the involvement of a competent public official or government authority (Article 286 paragraph (1) of the Rbg/Article 1874 of the Civil Code). Consequently, such a document must be corroborated by other evidence or supporting indications. Nevertheless, despite the statutory provisions governing authentic deeds, cases of forgery of documents continue to occur, which may be attributed to certain interests or specific objectives pursued by the perpetrators..

Criminal Act of Document Forgery

The criminal act of document forgery is an offense committed by an individual by falsifying a document or creating a forged document with the intent of obtaining an advantage for oneself or another party, thereby causing harm to others.

R.Soesilo in his book*Kitab Undang-Undang Hukum Pidana* (KUHP) and Its Complete Article-by-Article Commentaryexplains that the term “document”as referred to in this article encompasses all forms of written instruments, whether handwritten, printed, typed using a typewriter, or produced by other means.

Forms of Forged Documents

1) Documents that may give rise to a right, such as diplomas, admission tickets, share certificates, and others;
2) Documents that may give rise to an agreement, such as loan agreements, sales agreements, lease agreements, and the like;
3) Documents that may give rise to a release of debt, such as receipts or similar instruments; or

4) Documents used as evidence of an act or event, such as birth certificates, postal savings books, cash books, ship logbooks, bills of lading, bonds, and others.

Forms of Document Forgery

According to R. Soesilo, the forms of document forgery are carried out in the following ways:

1) Creating a forged document: producing a document whose contents are not as they should be (false).
2) Altering a document: modifying a document in such a way that its contents differ from the original. This may be done in various ways; the document need not always be replaced with another, but may also be altered by subtracting, adding, or changing something in it.
3) Forging a signature: included within the scope of document forgery.
4) Affixing another person's photograph in place of the rightful holder's, for example in a school diploma.

This explanation clarifies the various forms of document forgery involving different types of documents commonly used in daily life, whether handwritten, typed, or printed.

When examined in light of the provisions of the Indonesian Penal Code (KUHP) relating to the articles on the Criminal Act of Document Forgery, as set forth in Book II, Chapter XII, it can be seen that the offense of document forgery may be classified into seven types of crimes, namely:

1) General document forgery: the basic form of document forgery (Article 263 KUHP);
2) Aggravated document forgery (Article 264 KUHP);
3) Causing false information to be entered into an authentic deed (Article 266 KUHP);
4) Forgery of medical certificates (Articles 267 and 268 KUHP);
5) Forgery of certain specified documents (Articles 269, 270, 271 KUHP);
6) Forgery of official certificates concerning property rights (Article 274 KUHP);
7) Possession of materials or instruments intended for document forgery (Article 275 KUHP), (Adami Chazawi dan Ardi Ferdian, 2014).

In a criminal act, there are typically perpetrators and victims of the actions committed by the offender. Sometimes, the act of document forgery occurs because one party seeks to obtain a benefit, which in turn causes a loss to another party. In the case of forgery of authentic deeds, there is, of course, always a perpetrator responsible for the forgery. As explained above, an authentic deed is a document made in the presence of a competent public official, one of whom is a notary, a professional entrusted with the duties and authority in the creation of authentic deeds.However, what if the act of forgery of an authentic deed is committed by the notary themselves? Observing current

phenomena, it appears that such cases have already become relatively common in society.

Position of the Notary

A notary is a professional office appointed by the state through a governmental body within the Ministry of Law and Human Rights and is officially granted the authority to draft authentic deeds. Thus, when members of the public wish to create an authentic deed, it can be prepared by or in the presence of a notary in accordance with the law. Law No. 30 of 2004 concerning the Position of Notary, Article 1, stipulates that a notary is a public official authorized to create authentic deeds and exercise other authorities as specified in this law. Accordingly, all regulations regarding the office of a notary are contained within this legislation.

According to Gandasubrata, a notary is a public official appointed by the government, and is considered part of the law enforcement apparatus that provides services to the public. Services provided to the public in the creation of authentic deeds constitute a specialized duty of the notary profession, as the authority held by a notary differs from that of an arbitrator or an ordinary lawyer. Therefore, when a notary is to perform their duties, they are required to take an official oath of office and pledge their commitment before the Minister of Law and Human Rights.

The authority of a notary in drafting authentic deeds is divided into two types: Akta Relaas and Akta Partij.

1) Akta Relaas is a deed prepared by a notary as a public official, containing an authentic account of all events or occurrences that the notary has seen, experienced, and witnessed personally.

According to G.H.S. Lumban Tobing, an *Akta Relaas* is a deed containing the notary's account of what they have personally observed and witnessed, made at the request of the parties so that the actions or acts of the parties can be formally documented in a notarial deed.

According to A.A. Andi Prayitno, an *Akta Relaas* is a deed recording all events that the notary has seen, heard, and perceived during the conduct of meetings or events being documented.

And according to Herry Susanto, an *Akta Relaas* is a deed prepared by a notary as a public official, containing written statements of the official who made the deed, and the truth of its contents is unquestionable, except when challenged on the grounds that the deed is forged (Herry Susanto, 2010).

2) Akta Partij is a deed made in the presence of a notary, created when an individual appears before the notary to provide statements, which the notary confirms and formalizes into a notarial deed.

These authentic deeds hold full evidentiary power and do not require additional

evidence, such as witness testimony. This means that in the event of a dispute, if an authentic deed is presented before a judge, the contents of the deed are considered perfect evidence. However, if the opposing party claims that the deed is inaccurate or contains falsifications, they are obligated to prove that the authentic deed is indeed incorrect.

Notary Responsibility

A notary, upon appointment, is required to take an oath and pledge to provide guidance and adhere faithfully to the duties of the office. Consequently, a notary must strictly comply with the prevailing laws and regulations in serving the public. However, in practice, there have been numerous cases where notaries commit criminal acts, such as providing false statements or including false information in authentic deeds, which are inherently products of the notary themselves.If a notary provides false statements regarding a deed they have created, they can be held accountable, as this constitutes the criminal act of document forgery, regulated under Article 263 of the Indonesian Penal Code (KUHP). Furthermore, if the false statements involve an authentic deed, the penalties imposed will be more severe compared to forgery or false statements involving ordinary documents.

S.R. Sianturi refers to the criminal act of document forgery as formulated in Article 263 of the KUHP as "simple document forgery." The elements of document forgery under Article 263 paragraph (1) of the KUHP are as follows:

1) Any person;
2) Who creates a false document or falsifies a document;
3) Which may give rise to a right, an obligation, or a release of debt, or is intended as evidence of a matter;
4) With the intent;
5) To use or cause another to use the document as if its contents were true and not falsified.

Whereas the elements under Article 263 paragraph (2) of the KUHP are:

1) Any person;
2) Who knowingly;
3) Uses a false or falsified document as if it were genuine; and
4) If the use of the document may cause harm.

Article 263 of the Indonesian Penal Code (KUHP) regulates criminal acts involving ordinary documents, whereas if the falsification concerns an authentic deed, the applicable provision is Article 264 of the KUHP, which imposes a heavier penalty than Article 263. As a public official, a notary must exercise prudence in serving the public and act with utmost caution in carrying out their duties, particularly to avoid criminal liability, especially in cases of falsification of authentic deeds that may cause losses. The

notion of "loss" as referred to in Article 263 paragraph (1) of the KUHP encompasses not only material loss but also immaterial loss.

Roeslan Saleh elaborates on criminal liability, which can be understood as the attribution of objective blame to an individual who commits a criminal act, and who, subjectively, fulfills the requirements to be held criminally liable for such conduct. Objective blame refers to the fact that the act committed constitutes a prohibited act—meaning an act prohibited by law, whether under formal or substantive law. Subjective blame, on the other hand, pertains to the individual who commits the act, namely, a person who personally engages in conduct that is prohibited by law. However, if it is established that the individual who committed such prohibited conduct possesses circumstances that preclude accountability, then criminal liability cannot be imposed (Roeslan Saleh, 2017). Accordingly, if a notary is involved in the criminal act of document forgery, the imposition of sanctions constitutes a form of accountability for the violation committed. Sanctions imposed upon notaries may take the form of administrative, civil, or criminal sanctions. Administrative sanctions may be imposed by the Regional Supervisory Council *(Majelis Pengawas Wilayah/MPW)*, the Central Supervisory Council *(Majelis Pengawas Pusat/MPP)*, and/or the Minister, and may include: written warnings, temporary suspension, dismissal with honor, or dismissal without honor.

Article 16 paragraph (1) letter a of the Notary Office Act stipulates and regulates the obligation of a notary to act honestly, carefully, independently, impartially, and to safeguard the interests of the parties involved in a legal act.

4. Conclusion

Related to the criminal act of forgery of letters and authentic deeds as stipulated in Article 263 and Article 264 of the Indonesian Criminal Code (KUHP), it must be understood that there is no such term as a "false authentic deed." This is because every authentic deed that has been made by, or before, a competent official possesses legal validity. However, what should be understood concerning a forged authentic deed lies in the statements contained within the deed itself.For example, in light of the widely discussed case that serves as the background of this journalnamely, the allegation regarding President Jokowi's diploma being falseit is essential to determine whether this involves the act of *creating a false document* or *falsifying an existing document*.In addressing the offense of forgery, one must distinguish between its material and formal aspects. In the material sense, forgery means that the contents of a letter, document, or authentic deed state matters that are untrue or inconsistent with the actual facts. In the formal sense, it relates to the elements of the letter, document, or authentic deed itself, namely whether its essential elements were falsifiedfor instance, if the person signing the document lacked the authority to do so, or if the signature included was forged.If an authentic deed prepared by a notary is proven to contain false informationwhether materially or formallythen the authenticity of that deed is nullified, and it becomes

equivalent to an ordinary deed, despite having been made by a notary.

As a notary is obligated to carry out his or her duties in accordance with the principles and oath of office, as well as in compliance with the provisions of the Notary Office Act. A notary may be subject to criminal sanctions if found guilty of unlawful conduct in the form of forgery of documents, especially when such acts cause harm to particular parties, as stipulated under Article 264 of the Indonesian Criminal Code (KUHP).

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