NOTARY AUTHORITY IN LEGALIZING FOREIGN PUBLIC DOCUMENTS AFTER ACCESSION TO THE APOSTILLE CONVENTION IN INDONESIA

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Abstract

This study aims to understand the procedure of legalizing foreign documents in accordance with The Hague Convention on the Abolition of Legalization Obligations for Foreign Public Documents 1961 and analyze the authority of a Notary in legalizing foreign public documents after the issuance of the Presidential Regulation on Ratification of the Convention on the Abolition of Legalization Obligations for Foreign Public Documents 1961. This research uses a normative legal approach with the support of legal concept analysis and regulatory approaches, as well as qualitative analysis techniques through several steps, namely systematization, description, and explanation. The study results show that the legalization of foreign documents in accordance with the Apostille Convention is carried out by eliminating diplomatic or consular legalization procedures and only requires the fulfillment of formalistic requirements stipulated in the Apostille Convention. Regarding the authority of a Notary in legalizing foreign public documents after the issuance of the Presidential Regulation on Access to the Apostille Convention remains in effect and does not reduce the authority of a Notary as stipulated in the Amended Notary Office Law because a Notary is an official appointed to legalize public documents issued or official certificates in accordance with the Apostille Convention.

Keywords: *Authority of Notary, Legalization, Foreign Public Document, Apostille*

1. INTRODUCTION

The advancements in technology and the abundance of information in today's society have had far-reaching effects on various aspects of life, including the evolution and progress of Indonesian law. This transformation is evident in the recent actions taken by the Government of Indonesia, specifically the Ministry of Law and Human Rights, on January 5, 2021. On this date, the government issued Presidential Regulation Number 2 of 2021, which pertains to the Ratification of the Convention Abolishing the Requirement of Legalization for Foreign Public Documents. This regulation, commonly known as the Presidential Regulation on Accession to the Apostille Convention, signifies a significant shift and modernization in the legal framework concerning the authentication of foreign public documents. By aligning itself with other nations that have already become parties to the Apostille Convention, Indonesia is embracing change and embracing a more streamlined and efficient approach to the legalization process (Nurhidayatullah, 2023). The Apostille Convention is a convention held in order to simplify the administrative process regarding the requirement of legalization or legalization of foreign public documents (Mayana & Santika, 2021). To bind itself to the Apostille Convention, a country can ratify or accession to the Apostille Convention so that a country is subject to the provisions stipulated in the Apostille Convention and applies to its member countries (Mayana & Santika, 2021).

The Apostille Convention aims to remove the requirement for diplomatic or consular legalization of documents originating from abroad that are categorized as public documents (Arieftha & Putra, 2022). The Apostille Convention is motivated by the development of bilateral and multilateral relations between subjects across state borders including civil relations which require a legalization process for documents of a public nature, where all documents must be endorsed by the diplomatic representative of the country of origin in the destination country where the document will be used (Arieftha & Putra, 2022). Initially, the legalization process for documents of foreign nationals residing abroad requires a power of attorney document given to a consultant/proxy/legal advisor, which must be signed by a local Notary Public (Nurhidayatullah, 2023). The Apostille Convention replaced this time-consuming process with a single certificate issued by a designated competent authority in the country where the public document is to be executed (Nurhidayatullah, 2023).

According to Article 1 paragraph 2 of the Presidential Regulation on Accession to the Apostille Convention stipulates that a copy of the original text of the Apostille Convention has been translated into Indonesian as attached to the regulation and is an inseparable part of the Apostille Convention Presidential Regulation, so that in this writing the Indonesian translation will be used in quoting the provisions in the Apostille Convention. Referring to Article 1 of the Apostille Convention, it has been explained which are included in public documents and which are not included in public documents, which reads as follows.

Article 1

> This Convention shall apply to public documents which are used in the territory of a Contracting State and which must be produced in the territory of another Contracting State. For the purposes of this Convention, what is considered a public document is:
>
> a. documents originating from an authority or official relating to a court or State tribunal, including those originating from a public prosecutor, court clerk or bailiff ("*huissier de justice*");
> b. administrative documents;
> c. documents issued by a notary public;
> d. official certificates attached to documents signed by natural persons in the exercise of their civil powers, such as certificates recording the registration of a document or recording the specific validity of a document on a specific date and the attestation of signatures by officials and Notaries.

However, this Convention does not apply:

a. to documents signed by diplomatic or consular officials;
b. to administrative documents directly related to commercial or customs activities (Triashari, 2018).

Based on the above provisions, one of the public documents according to Article 1 letters c and d is a document issued by a Notary and/or a document authorized by a Notary. This can be interpreted that documents issued by Notaries are public documents, so this

Apostille Convention has a relationship with the implementation of the duties and authority of Notaries in Indonesia, namely the authority to issue notarial deeds and / or attestation of a document or often referred to as legalization. That legalization will be handled by a public Notary who works as a person who is responsible for being able to make, or certify and sign it so that the document has perfect evidentiary power (Gitayani, 2018).

However, the authority of a Notary varies depending on the legal system adopted by each country within the convention. The process of legalizing and authenticating documents involves the parties involved in an agreement having their documents made and signed in the presence of a Notary, who is a public official at the time of signing. The legalization process requires the documents to be verified by the Ministry of Law and Human Rights, which ensures that the signatures match. To fulfill their role, every Notary is required to provide a sample of their signature to the Ministry of Law and Human Rights. The Apostille Convention simplifies the formal procedures and facilitates the acceptance of public documents by countries that are party to the convention. The legalization process under the Apostille Convention has implications for the responsibilities and authority of Notaries as public officials who are authorized to create authentic deeds and legalize and authenticate public documents.

Based on this, it is necessary to re-examine the arrangements regarding the legalization of foreign documents according to the Apostille Convention and its implementing regulations in Indonesia, especially those relating to and/or intersecting with the authority of Notaries as stipulated in Law Number 2 of 2014 concerning Amendments to Law Number 30 of 2004 concerning the Notary Position (hereinafter referred to as the Notary Position Law Amendment) related to the legalization of foreign public documents after the issuance of the Perpres of Accession to the Apostille Convention so that in its implementation Notaries know the scope of their authority and also the limits of their authority related to the implementation of the Apostille Convention in Indonesia.

The purpose of this study is to examine the issues surrounding the legalization of foreign documents. These issues can be divided into two main areas. Firstly, it will analyze the procedures for legalizing foreign documents according to The Hague Convention of 1961. Secondly, it will investigate how the Presidential Regulation on the Ratification of the Convention impacts the authority of notaries in the process of legalizing foreign public documents. The study has two objectives: to understand and clarify the procedures outlined by The Hague Convention for legalizing foreign documents, and to analyze the role of notaries in the legalization process following the implementation of the Presidential Regulation ratifying the Convention.

Before conducting this research, several previous studies have been referred to that examine similar subject matter, but have several differences. A research by Dranisa (2022) discusses the provisions for the elimination of legalization of foreign public documents through the Apostille Convention as well as the application and urgency of Indonesia's accession process to the Apostille Convention in Indonesia through Presidential Regulation No. 2 of 2021 (Dranisa, 2022).

As well as in research by which discusses the use of Apostille Certificated for public documents in accordance with the Apostille Convention in force in Indonesia, and compares the use of Apostille Certificated in other countries (Gloria, 2021). Based on these two references, there are differences in this research which focuses more on the

regulation of legalization of foreign documents and the authority of Notary in legalizing foreign public documents after the accession of The Hague Convention Abolishing the Requirement of Legalization for Foreign Public Documents 1961 by the Government of Indonesia.

2. RESEARCH METHODS

Normative legal research is the methodology employed in this study, focusing on the examination of legal norms, principles, and doctrines. Specifically, this study will delve into the regulations governing the legalization of foreign documents in accordance with The Hague Convention Abolishing the Requirement of Legalization for Foreign Public Documents 1961. Furthermore, it will explore the roles and responsibilities of Notaries in the legalization process of both private and public documents as stipulated in the Notary Position Law Amendment, Perpres of Accession to the Apostille Convention, Permenkumham Apostille Services, and the Apostille Convention. This form of normative legal research is underpinned by two key approaches, namely legislative analysis and legal concept analysis, to dissect the issues at hand. The research methodology involves the utilization of document study techniques for legal material search, as well as qualitative analysis techniques encompassing systematization, description, and explanation (Qamar & Rezah, 2020).

3. RESULTS AND DISCUSSION

3.1. Legalization Arrangement of Foreign Public Documents According to the Apostille Convention

A document is declared trustworthy if it meets two qualities, namely reliability and authenticity (Dranisa, 2022). Public documents can be declared to have met the reliability requirements if the information in them is accurate information in accordance with what actually happened (Dranisa, 2022). This serves as proof that the document created by the parties was indeed signed by the parties and the process was witnessed by a Public Official. For documents that can be declared to have met the authenticity requirement, if the contents of the document are as intended by the author and are not in a damaged condition (Qamar & Rezah, 2020). To meet these two requirements (authenticity and reliability), the document must go through an attestation process known as legalization (Qamar & Rezah, 2020).

Document legalization is the process of identifying a document to determine that it is legally valid, issued and signed by an authorized party (Qamar & Rezah, 2020). Generally, documents that require legalization from a certain authority are public documents that will be used outside the territory of the country where the document was issued or documents originating from abroad that are to be used in a country (Nanda & Velentina, 2022). The legalization process of public documents originating from abroad involves a complicated, lengthy procedure and requires a lot of money. For this reason, the Apostille Convention became a legal breakthrough in 1961 to accommodate the legalization of a public document with more effective terms and procedures, so as to reduce the costs and time used to legalize a public document (Nanda & Velentina, 2022).

Apostille is an official signature attestation, stamp attestation, and/or official seal in a public document through matching with a specimen through one agency (Abidin &

Wirasasmita, 2022). In general, public documents issued by the state do not require a verification of the origin of the document if it is used in that state (Abidin & Wirasasmita, 2022). This provision does not apply if the document will be used in another country, because the institution or official who issued the document is not known between countries, so this is the background to the need for legalization (Nanda & Velentina, 2022). Referring to the provisions stipulated in the Apostille Convention in Article 1 which regulates the qualifications of public documents that are subject to this Convention and must apply to public documents used in the territory of the convention participating countries. The types of public documents referred to are:

a. Documents issued by certain authorities or officials associated with a country's courts, including documents sourced from public prosecutors, court clerks and/or bailiffs;
b. Administrative documents such as population and civil registration documents;
c. Deeds or documents issued by a Notary official; and
d. Official certificates that are attached to private documents and have a recorded validity period, specific date of signing, and signature attestation by a Public Official and Notary (Nurhidayatullah, 2023).

In addition to these documents, it excludes public documents that fall under the Apostille Convention, such as those signed by diplomatic or consular officials and/or administrative documents directly linked to commercial or customs activities. The legalization process for these documents is governed by the specific provisions related to diplomatic and consular relations, as well as commercial and customs law.

Furthermore, Article 2 of the Apostille Convention regulates the obligation of the countries participating in the convention to waive legalization of documents referred to in Article 1 of the Apostille Convention. Given that legalization according to the Apostille Convention is only a formality for diplomatic or consular officials to certify the authenticity of the signature, the authority of the document signatory, and the identity of the seal or stamp attached to the document with the procedures that have been carried out so far (Safira & Putra, 2022). However, the Apostille Convention still has formality requirements for the legalization of public documents, especially regarding the validation of the authenticity of a signature, its authority, the identity of the seal or stamp contained in the document is to add an Apostille certificate issued by the competent state authority where the document originated, this is regulated in Article 3 and Article 4 of the Apostille Convention (Safira & Putra, 2022).

For Apostille certificates, the official language of the issuing authority can be used while still including the title, namely "Apostille (Convention de la Haye du 5 octobre 1961)" which must use French. Referring to Article 5 of the Apostille Convention with an Apostille certificate a signature, the authority of the document signatory, and the identity of the seal or stamp attached to the public document can be declared authentic, so that the signature, seal and stamp on the certificate are exempt from any further attestation in the country where the public document will be used (Safira & Putra, 2022).

The Apostille Convention provides flexibility to each participating country to determine which institution or authority is authorized to issue Apostille certificates as its competence. That according to Article 7 of the Apostille Convention, stipulates that "Each authority designated in accordance with Article 6 shall keep a register or card index in which the authority shall record the certificates issued, stating: a) the number and date of

the certificate; b) the name of the signatory of the public document and his authority, or in the case of an unsigned document, the name of the authority who has affixed the seal or stamp."

Further arrangements regarding the Apostille process in Indonesia as a follow-up to the accession of the Apostille Convention by the government through the Presidential Decree of Accession to the Apostille Convention are outlined through the Regulation of the Minister of Law and Human Rights of the Republic of Indonesia Number 6 of 2022 concerning Apostille Legalization Services on Public Documents (hereinafter referred to as Permenkumham Apostille Service) as an implementing regulation of the Presidential Decree of Accession to the Apostille Convention which regulates the technical process of legalizing Apostille on public documents in Indonesia. Article 1 point 1 of the Permenkumham Apostille Service regulates the definition of Apostille Legalization, hereinafter referred to as Apostille, which is the process of attesting an Official's signature, stamp and/or official seal contained in a public document requested for verification.

As mentioned earlier about the qualifications of public documents under the Apostille Convention, there are some differences in Indonesia when it comes to the types of public documents exempted from Apostille. The Presidential Regulation's Annex on joining the Apostille Convention states that documents issued by the prosecutor's office in Indonesia are not considered for Apostille. This means that documents from the prosecutor's office in criminal cases must still go through diplomatic or consular legalization if they are to be used abroad.

The Permenkumham Apostille Service further regulates the procedures for applying for Apostille of public documents in Article 3 paragraph (3), namely by filling out an application form which at least contains (Dranisa, 2022):

a. The identity of the Applicant;
b. The identity of the proxy, if the request is submitted by proxy;
c. The country of destination where the Document will be used;
d. The type of Document for which the Apostille will be requested;
e. The name and number of the Document and the name of the owner stated on the Document to be requested for Apostille;
f. The name of the Official signing the Document; and
g. The name of the agency that issued the Document.

In addition to completing the information and data in the Apostille application form, it is also important to upload supporting documents. These documents include the applicant's identity card, power of attorney identity card, power of attorney (if applicable), and the required documents for Apostille. Once the application is received, the Ministry of Law and Human Rights of the Republic of Indonesia, specifically the Directorate General of General Legal Administration, will verify the Apostille application. This verification process is done to ensure several things. Firstly, they check if the information on the application form matches the uploaded supporting documents. Secondly, they compare the official's signature, stamp, and/or official seal on the document with the specimen in the database of the Directorate General of General Legal Administration. Lastly, they verify the validity of the electronic signature on the electronic document. The verification process usually takes a maximum of 3 working days after the application is received.

3.2. The Authority of Notary in Legalizing Foreign Public Documents After the Accession of the Apostille Convention by the Government of Indonesia

Notary as an official who is given attributive authority by law, one of which is to make documents that have strong legal force in a legal process in accordance with rights and authorities (Mahja, 2005). The authority of Notary is divided into three types as stipulated in Article 15 from paragraph (1) to paragraph (3) of the Law on the Position of Notary Amendment and is fully explained as follows.

Article 15 paragraph (1) of the Notary Position Law stipulates that "Notaries are authorized to make deeds in general, what is meant by deeds in general are deeds made based on predetermined limitations." The limitations are "(1) The authority is not excluded to other officials stipulated by law; (2) In terms of deeds that must be made by a Notary, it is an authentic deed regarding all actions, agreements and provisions that are required by the rules of law to be made or desired by the person concerned; and/or (3) In terms of the interests of the legal subject, it must be clear for whose benefit a deed is made (Cindarputera & Putra, 2022).

Article 15 paragraph (2) of the Notary Position Law amends that:

> "In addition to the authority as referred to in paragraph (1), Notary is also authorized:
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> a. Certify the signature and determine the date certainty of the private letter by registering it in a special book;
> b. Record the private letter by registering it in a special book;
> c. Make a copy of the original private letter in the form of a copy containing the description as written and described in the letter concerned;
> d. Attesting the suitability of the photocopy with the original letter;
> e. Provide legal counseling in connection with the making of a deed;
> f. Make deeds relating to land; or
> g. Make a deed of auction minutes."

Another special authority of Notary is also regulated in Article Article 51 paragraph (4) of the Notary Position Law with the amendment of the special authority, namely "Notary is authorized to correct writing errors and/or typographical errors contained in the Minuta of the Deed that has been signed in the presence of the confrontant, witnesses, and Notary as outlined in the minutes and provide a note about it on the original Minuta of the Deed by mentioning the date and Deed number of the correction minutes" (Notaris, 2013).

According to Habib Adjie, "Notary is possible to have authority that will be determined later, according to Article 15 paragraph 3 of the Notary Position Law Amendment stipulates that the authority that will be determined later is the authority of Notary based on other legal rules that will come later (*ius constituendum*) (Adjie, 2014). Based on this understanding, what is meant by this authority is that this authority occurs when another law is made.

The exercise of authority as a Notary is also followed by duties that must be fulfilled as stipulated in Article 16 paragraph (1) of the Notary Position Law, one of which is obliged to provide services in accordance with the provisions of this Law, unless there is a reason to refuse it (Anggelina, 2018). This obligation is closely related to the

legalization authority regulated outside the Notary Position Law Amendment, one of which is the Presidential Regulation on Accession to the Apostille Convention and the Permenkumham Apostille Service. These provisions also regulate the legalization of public documents issued by Notaries or official certificates attached to legalization information by Notaries (Bujangga & Purwanto, 2022), so there is a connection between the obligations of Notaries and the legalization process regulated in the Perpres of Accession to the Apostille Convention and Permenkumham of Apostille Services.

Legalization by a Notary is an acknowledgment of the date the agreement was made, so that a private letter that has obtained legalization provides certainty for the judge regarding the date, identity, and signature of the parties concerned and related to the agreement. In this case the parties whose names are listed in the letter and require their signatures under the letter can no longer say that the parties or one of the parties does not know what the contents of the letter are, because the contents have been read out and explained before the parties put their signatures in front of the public officials concerned and in front of witnesses. Based on this, the Notary has the authority to legalize documents made by the parties within the scope of civil relations or documents issued by the Notary which are known as notarial deeds.

The authority of a Notary to legalize a document is closely tied to the applicability of the Apostille Convention in Indonesia. Notaries, as Public Officials, have the power to certify signatures and verify the authenticity of letters by recording them in a special book, as stated in Article 15 paragraph (2) of the Notary Position Law Amendment. However, with the implementation of the Perpres of Accession to the Apostille Convention and the Permenkumham of Apostille Services, there has been a debate regarding whether Notaries are still authorized to legalize documents created by parties in civil relations or documents issued by Notaries themselves for use abroad as public documents. This is because the formal requirements for legalizing public documents under the Apostille Convention only require obtaining an Apostille certificate from the competent authority. In Indonesia, the competent authority for Apostille Services is the Directorate General of General Legal Administration of the Ministry of Law and Human Rights of the Republic of Indonesia.

Upon reexamination of the provisions stated in Article 1 number 3 of the Permenkumham Apostille Service, it is clear that an Official authorized to legalize and issue Apostille certificates is an individual who holds a specific position or role in a government office, institution, or non-governmental organization. This includes public officials appointed by the government. Notably, the definition of Official, as per Article 1 point 3 of the Permenkumham Apostille Service, encompasses Notaries since they are public officials appointed by the government. Therefore, the authority of Notaries to legalize public documents remains intact. However, it is important to note that the issuance of Apostille certificates falls under the jurisdiction of the Directorate General of General Legal Administration of the Ministry of Law and Human Rights of the Republic of Indonesia. This is clearly stated in Article 11 paragraph (3) of the Permenkumham Apostille Services, which specifies that "Apostille certificates issued and Apostille certificate registers are stored in the database of the Directorate General of General Legal Administration."

To reinforce the notion that Notaries still possess the power to authenticate public documents even after the implementation of the Apostille Convention, reference can be made to Article 4 of the Permenkumham Apostille Service. This article governs the

verification process conducted by the Directorate General of General Legal Administration, which involves checking the Officer's signature, stamp, and/or official seal on the Document against the Specimen stored in the Directorate General of General Legal Administration's database. In the case of a public document issued or legalized by a Notary, the verification provisions ensure that the document's legalization for Apostille is accurate. This verification process is crucial in determining whether the Apostille application will be accepted or rejected. If accepted, the Notary's signature and official seal will be included in the Apostille certificate.

Additionally, Article 11 paragraph (2) of the Permenkumham Apostille Service further supports the notion that Notaries retain the authority to legalize public documents after the enactment of the Apostille Convention. This article states that the Apostille certificate register contains the certificate's number, date, as well as the name, position, and institution of the Official who signs the Document. In the case of a document legalized or issued by a Notary, the Apostille certificate will include the Notary's signature, name, and other document legalization procedures carried out by the Notary in accordance with their authority as specified in Article 15 paragraph (2) letter a of the Notary Position Law Amendment. Therefore, it can be concluded that there is no reduction in the Notary's authority to legalize public documents following the implementation of the Perpres on Accession to the Apostille Convention and Permenkumham on Apostille Services.

4. CONCLUSION

The study findings indicate that regulations concerning the legalization of foreign documents under The Hague Convention Abolishing the Requirement of Legalization for Foreign Public Documents 1961 are implemented on public documents mentioned in Article 1 of the Apostille Convention. This is done by eliminating diplomatic or consular legalization procedures and only requiring the fulfillment of formalistic legalization requirements outlined in Article 3 and Article 4 of the Apostille Convention. This includes obtaining an Apostille certificate from the competent state authority where the document originates, as stated in Article 7 of the Apostille Convention. The authority of Notaries to legalize foreign public documents remains unchanged after the issuance of the Presidential Regulation on the Ratification of the Convention Abolishing the Requirement of Legalization for Foreign Public Documents 1961. This is further supported by Article 15 paragraph (2) letter a of the Notary Law Amendment, even after the enactment of the Presidential Regulation on Accession to the Apostille Convention and Permenkumham Apostille Services. Notaries are still authorized officials to legalize public documents issued by them or official certificates, as specified in Article 1 of the Apostille Convention in conjunction with Article 2 paragraph (3), Article 4 paragraph (2) letter b, and Article 11 paragraph (4) of the Permenkumham Apostille Service.

REFERENCES

Abidin, Z., & Wirasasmita, J. A. (2022). Kekuatan Hukum Surat Kuasa dari Luar Negeri yang Tidak Dilegalisasi oleh Kedutaan Besar Indonesia. *Journal of Education, Humaniora and Social Sciences (JEHSS)*, *5*(1), 293–303.

Adjie, H. (2014). *Hukum Notaris Indonesia: Tafsir Tematik Terhadap UU No. 30 Tahun*

2004 Tentang Jabatan Notaris.
Anggelina, N. P. (2018). *Kedudukan Hukum Saksi Instrumentair Terkait Keautentikan Akta Notaris*. Udayana University.
Arieftha, M. A., & Putra, M. F. M. (2022). Efektivitas Peran Notaris Dalam Peninjauan Keabsahan Tanda Tangan Secara Elektronik. *JISIP (Jurnal Ilmu Sosial Dan Pendidikan)*, *6*(4).
Bujangga, I. K. W. A., & Purwanto, I. W. N. (2022). Application of the Liability Principle in the Land Sale as Joint Property Before a Notary. *POLICY, LAW, NOTARY AND REGULATORY ISSUES*, *1*(4), 9–16. https://doi.org/10.55047/polri.v1i4.433
Cindarputera, R., & Putra, M. F. M. (2022). Kewenangan Notaris Dalam Persoalanpenyuluhan Hukum Dan Mediasi. *JISIP (Jurnal Ilmu Sosial Dan Pendidikan)*, *6*(3).
Dranisa, A. S. (2022). *Penghapusan legalisasi dokumen publik asing melalui konvensi apostille*. Universitas Pendidikan Ganesha.
Gitayani, L. P. C. (2018). Penerapan Etika Profesi oleh Notaris dalam Memberikan Pelayanan Jasa Kepada Klien. *Acta Comitas: Jurnal Hukum Kenotariatan*, *3*(3), 426–435.
Gloria, M. A. (2021). Arti Penting Apostile Certified Bagi Pengesahan Dokumen Asing. *Res Judicata*, *4*(1), 46–60.
Mahja, D. (2005). Undang-Undang Nomor 30 Tahun 2004 tentang Jabatan Notaris. *Jakarta: Durat Bahagia*.
Mayana, R. F., & Santika, T. (2021). Legalitas tanda tangan elektronik: posibilitas dan tantangan notary digitalization di Indonesia. *ACTA DIURNAL Jurnal Ilmu Hukum Kenotariatan*, *4*(2), 244–262.
Nanda, R. R., & Velentina, R. A. (2022). Tanggung Jawab Notaris Dalam Legalisasi Dokumen Warga Negara Asing Menurut Konvensi Apostille. *Jurnal USM Law Review*, *5*(1), 270–281.
Notaris, P. P. I. (2013). *Jati Diri Notaris Indonesia*. Gramedia Pustaka Utama.
Nurhidayatullah, M. R. (2023). Peran Notaris Dalam Pelaksanaan Legalisasi DOkumen Publik Asing Menurut Konvensi Apostille. *Jurnal Multidisiplin Indonesia*, *2*(1), 56–62.
Qamar, N., & Rezah, F. S. (2020). *Metode Penelitian Hukum: Doktrinal dan Non-Doktrinal*. CV. Social Politic Genius (SIGn).
Safira, A., & Putra, M. F. M. (2022). Kekuatan Pembuktian Salinan Akta Auntentik Yang Dikeluarkan Oleh Notaris Pemegang Protokol. *JURNAL USM LAW REVIEW*, *5*(2), 584–592.
Triashari, N. W. (2018). Kekuatan Hukum Perseujuan Suami atau Istri yang dibuat di Bawah Tangan. *Acta Comitas: Jurnal Hukum Kenotariatan*, *3*(3), 500–510.

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