

Legal Analysis of the Notary's Obligation to Affix the Appearers' Fingerprints on the Minuta (Original) Deed

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Received: 07/04/2026

Revised: 11/06/2026

Received: 18/07/2026

Abstract

This research aims to identify and analyze the legal basis obliging a notary to require appearers to affix their fingerprints on the Minuta Akta, viewed from the resolution of norm conflict and the principle of legal certainty, and to examine the legal risks a notary faces, along with their implications for evidentiary strength, when this obligation is neglected. The research employs a normative legal method through statute and conceptual approaches, drawing on primary, secondary, and tertiary legal materials analyzed through prescriptive-qualitative reasoning and deductive syllogism. The results show that Article 16 paragraph (1) letter c of the Notary Position Law imperatively binds the notary, and its apparent tension with Articles 1 and 38 is resolved through the principle of *lex posterior derogat legi priori*, positioning the fingerprint as a complement to, not a substitute for, the signature. Neglecting this obligation carries cumulative risk: the deed's evidentiary force may be degraded to that of a private instrument under Article 1869 of the Civil Code, while the notary may face administrative sanction and ethical censure. These findings affirm that fingerprinting functions as a constitutive safeguard of authenticity essential to legal certainty in notarial practice.

Keywords

Fingerprint, Minuta Akta, Legal Certainty

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1. INTRODUCTION

Notaries across Indonesia's jurisdictions have, in day-to-day practice, treated the affixing of appearers' fingerprints on the Minuta Akta as a routine closing step performed immediately after the reading and signing of the deed. This practice runs smoothly in most notarial offices, where staff prepare an ink pad alongside the signature page so that the appearer's thumbprint is captured in the same sitting as the wet-ink signature. The procedure has become embedded in standard office workflow, carried out consistently regardless of the appearer's educational background, social status, or physical condition, and is generally completed without significant delay or resistance from the parties involved.

In terms of outcomes, this established routine has functioned effectively as a safeguard against later disputes over a party's presence or identity. Notarial offices that consistently apply the fingerprinting step report that their Minuta Akta files are well-equipped to withstand challenges when a party later



attempts to deny having appeared or having signed. The physical, ink-based record sitting beside the signature gives the notary's archive an added layer of assurance that is simple to produce and easy to explain to supervisory bodies or, if needed, to a court.

This success is also visible in how smoothly the practice integrates into the notary's daily administrative rhythm. Filing, binding, and archiving the Minuta Akta into the Notary's Protocol proceeds without any special technical obstacle once the fingerprint has been affixed, and notarial offices are able to maintain tidy, chronologically ordered records without extra cost or specialized equipment. In short, at the level of daily field practice, the fingerprinting step has been carried out consistently and has achieved its practical purpose of reinforcing the physical record of the appearer's presence.

Ideally, however, this practical success should not have been achievable with such ease and uniformity, because the governing legal framework itself does not provide a clear, harmonized basis for the practice. Legal certainty theory holds that a norm must be clear, consistent, and free of internal contradiction so that its application is predictable for both officials and the public (Turatmiyah et al., 2024). Article 16 paragraph (1) letter c of the Notary Position Law imperatively requires the notary to affix the appearer's fingerprint to the Minuta Akta, yet Article 1 number 8 of the same statute defines the Minuta Akta solely by reference to the signatures of the appearers, witnesses, and the notary, without mentioning fingerprints at all, and Article 38 paragraph (4) letter a similarly confines the closing section of the deed to matters of reading, translation, and signing (Turatmiyah et al., 2024). On these theoretical grounds, the seamless, near-universal compliance observed in practice is not what one would predict from a norm this internally unsettled.

Comparing the two pictures above reveals a clear gap between *das sein* and *das sollen*. In the field, notaries carry out the fingerprinting obligation smoothly and treat it as a settled, almost mechanical part of deed closing, and this practice functions well in shielding the deed from later denial. Yet according to the ideal standard of legal certainty, such smooth and uniform compliance should be difficult to sustain, because the statute itself is internally inconsistent: one provision commands the act, while the provisions defining the Minuta Akta and its closing section are silent on it. A practice this settled should not be able to rest so comfortably on a textual foundation this unsettled.

This gap gives rise to the central research problem: notaries continue to perform the fingerprinting obligation effectively despite the absence of a harmonized statutory basis for it, raising doubt as to what actually anchors this obligation and what happens when the practice is not followed. From this problem, two research questions emerge: first, what is the legal basis obliging a notary to require appearers to affix their fingerprints on the Minuta Akta when viewed from the resolution of norm conflict and the principle of legal certainty; and second, what legal risks does a notary face, and what are the

implications for evidentiary strength, when appearers fail to affix their fingerprints on the Minuta Akta.

A substantial body of prior research has examined the fingerprinting obligation from various angles. Several studies have focused on the evidentiary consequences of a missing fingerprint, showing that its absence can weaken an authentic deed's standing before a judge and expose the notary to claims for damages (Dwikorianto & Indrasari, 2022; Adiamara et al., 2023; Adriano, 2021; Fikri, 2023; Zaki & Santiago, 2023; Gunawan, 2024). Others have concentrated on the notary's civil, administrative, and ethical liability where deed defects arise from careless practice, including liability for unlawful acts and administrative sanction by the Supervisory Council (Amalia, 2021; Sarapi, 2021; Mulyadi, 2023; Pradistya, 2022; Setiawan, 2023). A further cluster of studies addresses special categories of appearers, such as persons with disabilities, and how the obligation is adapted or excused in those circumstances (Ramadhanty & Budianto, 2023; Sesung & Putri, 2024). Additional work has explored the broader evidentiary architecture surrounding authentic deeds, including *waarmerking* documents and general proof of authentic acts in civil proceedings (Rahmadhani, 2021; Septianingsih et al., 2021; Sidrajat, 2024).

A second cluster of literature turns directly to the ambiguity within the Notary Position Law itself and to the emerging digital dimension of the obligation. Several works have identified the textual conflict between Article 16 paragraph (1) letter c and the definitional provisions of the statute, describing it as an unresolved ambiguity or a gap requiring critical reading (Hidayat, 2021; Kuncoro et al., 2021; Novelin & Sarjana, 2021; Nuari & Musyafah, 2023; Rahmawati, 2020; Nanda & Nawawi, 2022; Turatmiyah et al., 2024; Utari et al., 2024; Wiryanthari Dewi & Ibrahim, 2020). Others look forward to cyber notary practice, biometric authentication, and electronic fingerprint or signature validity, signaling that the paper-based obligation is already being pressured by digital transformation (Sudiartha & Kasih, 2022; Prameswari, 2024; Sugeng, 2023; Putri, 2022; Wibowo, 2021; Fitri, 2023; Sisthayoni & Wisanjaya, 2022; Kinasih, 2024; Januar et al., 2024; Priyanto & Seputra, 2023; Wardhani, 2022). Despite this range, none of these studies combines a systematic resolution of the Article 16/Article 1/Article 38 norm conflict with a structured mapping of the cumulative legal risk chain, evidentiary, administrative, and ethical, that a notary faces when the obligation is neglected, and none situates that combined analysis within the practical tension observed in daily notarial practice. This is the gap the present research occupies.

The novelty of this research lies in its integration of two analytical strands that prior studies have treated separately: the doctrinal resolution of the internal norm conflict within the Notary Position Law through the principle of legal certainty, and a comprehensive account of the three-dimensional legal risk, evidentiary, administrative, and ethical, that a notary incurs when the fingerprinting obligation is neglected. By connecting these strands, the research offers a single, coherent normative framework rather than a fragmented reading of isolated provisions or isolated risks.

The urgency of this research is tied to its contribution toward the achievement of Sustainable Development Goal 16, which calls for the promotion of just, peaceful, and inclusive societies built on effective, accountable, and transparent institutions. A notarial system in which fingerprinting practice rests on a clear and harmonized legal basis strengthens public trust in authentic deeds as instruments of legal certainty, reduces the burden of civil disputes arising from identity denial, and reinforces the accountability of a public-facing legal profession, all of which are directly relevant to strengthening the rule of law and institutional integrity that SDG 16 envisions.

This research is directed at answering two central questions. First, it examines what legal basis obliges a notary to require appearers to affix their fingerprints on the *Minuta Akta*, viewed from the resolution of the conflict of norms within the Notary Position Law and from the principle of legal certainty. Second, it examines what legal risks a notary faces, and what implications arise for the evidentiary strength of the deed, when appearers fail to affix their fingerprints on the *Minuta Akta*.

2. METHOD

This research employs a normative legal research method, also known as doctrinal legal research, which grounds its inquiry in doctrinal logic to test the coherence of legal principles and the synchronization of written statutory provisions, without conducting sociological field testing. Two approaches are used in tandem: the statute approach, which traces the hierarchy, examines the underlying legislative rationale (*ratio legis*), and unpacks both vertical and horizontal norm disharmony within Law Number 2 of 2014 on the Notary Position, particularly the tension among Articles 16, 1, and 38, resolved through the principle of *lex posterior derogat legi priori*; and the conceptual approach, which draws on the thinking of legal scholars, forensic fingerprint experts, and legal certainty doctrine to construct argumentation where the statute itself leaves the urgency of fingerprinting insufficiently elaborated.

The research relies entirely on secondary legal materials, drawn from primary sources (the Civil Code and the Notary Position Law), secondary sources (academic literature, notarial law textbooks, theses, and journal articles), and tertiary sources (legal dictionaries and specialized *daktiloskopi*/forensic terminology references), gathered through library research and systematic tracing of academic repositories. The collected materials are processed using a prescriptive-qualitative analysis technique, in which data is not reduced to statistics but interpreted for its normative meaning and expressed through consistent legal argumentation. Conclusions are drawn through deductive syllogism, moving from the general rule (the Major Premise, namely the statutory requirement that authentic deeds must satisfy formal conditions including fingerprint attachment under Article 16 UUJN) to the specific fact found in practice (the Minor Premise, namely instances of procedural defect

where a notary neglects this obligation), yielding a precise conclusion regarding the deed's evidentiary degradation and the notary's potential liability.

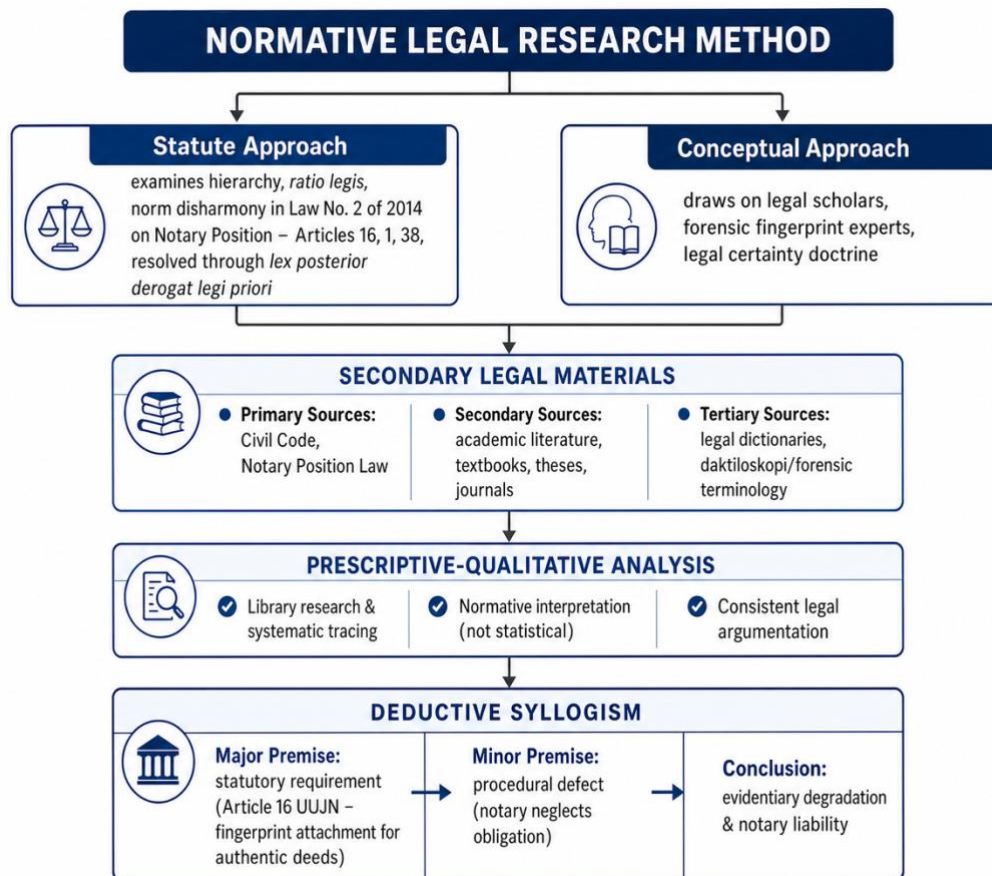


Figure 1. Research Methodology Framework

3. FINDINGS AND DISCUSSION

A. The Legal Basis Obliging a Notary to Require Appearers to Affix Their Fingerprints on the Minuta Akta, Viewed from the Resolution of Norm Conflict and the Principle of Legal Certainty

The mandatory basis for this obligation is found in Article 16 paragraph (1) letter c of Law Number 2 of 2014 on the Notary Position, which states plainly that in exercising their office, a notary is required to affix documents and the appearer's fingerprint to the Minuta Akta. The word "required" signals a coercive norm that leaves no room for discretion on the part of either the notary or the appearer; fingerprinting is not an optional courtesy but a compulsory element of deed formation. Read historically, this provision emerged from the state's concern over identity fraud and forged signatures that had repeatedly exposed notaries to manipulation prior to 2014, and it was designed to lock in a biometric guarantee that no signature alone could offer.

At the same time, the statute itself is not internally consistent. Article 1 number 8 defines the Minuta Akta only by reference to the signatures of the appearers, witnesses, and the notary, with no mention

of fingerprints, and Article 38 paragraph (4) letter a confines the closing section of the deed to matters of reading, translation, and signing. Taken in isolation, these provisions could support a narrower reading in which fingerprinting is treated as supplementary rather than constitutive. This is where legal certainty theory, as developed by Radbruch, becomes analytically necessary: a norm's legitimacy depends on its clarity, consistency, and predictability, and where two provisions appear to diverge, the resolution must come from systematic interpretation rather than literal, isolated reading. Applying the principle of *lex posterior derogat legi priori*, Article 16, introduced through the 2014 amendment, functions as the more recent and more specific implementing norm, while Article 1's general definition and Article 38's procedural listing do not exclude fingerprinting but simply predate the heightened biometric requirement. Read together, the two provisions are complementary rather than contradictory: the signature expresses the appearer's consent to the deed's content, while the fingerprint secures the physical identity of the person giving that consent.

This interpretation is reinforced by Article 39 paragraphs (1) and (2) of the same law, which obliges the notary to know, or be properly introduced to, the appearer. In an environment where identity documents such as the KTP remain vulnerable to forgery, fingerprinting supplies a biometric certainty that formal identification documents alone cannot guarantee. Field observation supports this reading in a practical sense: notarial offices apply the fingerprinting step as a matter of routine, typically using the thumb of the left or right hand in accordance with professional custom from the Indonesian Notary Association, even though the statute is silent on this technical detail. Variation nonetheless exists in how different offices execute the procedure, for example whether the print is affixed on a separate sheet or directly beside the signature, which itself reflects the absence of implementing regulation and illustrates why resolution of the norm conflict cannot rest on text alone but must be anchored in the purpose the provision serves: reinforcing legal certainty about who, in fact, appeared before the notary. Authority theory adds a further layer to this conclusion, since a notary's power to compel compliance with formal procedure is entirely attributive, derived from statute, and therefore cannot be waived on the notary's own initiative; once Article 16 imposes the fingerprinting duty, the notary has no discretionary latitude to treat it as optional regardless of how Article 1 or Article 38 are worded.

B. Legal Risks Faced by a Notary and Their Implications for Evidentiary Strength When Appearers Do Not Affix Their Fingerprints on the Minuta Akta

Where a notary neglects the fingerprinting obligation, the most immediate consequence falls on the evidentiary standing of the deed itself. Article 1868 of the Civil Code conditions the perfect evidentiary force of an authentic deed on compliance with the form prescribed by law, and Article 1869 provides that where this form is not satisfied, the deed is reduced to the status of a private instrument. Because Article 16 paragraph (1) letter c UUJN incorporates fingerprinting into that prescribed form, its

absence constitutes a procedural defect capable of triggering this downgrade. Article 16 paragraph (9) UUJN reinforces the point by allowing an aggrieved party to claim reimbursement of costs, compensation, and interest from the notary where such a breach of duty causes loss. Evidentiary theory in civil procedure explains why this downgrade matters so heavily in practice: an authentic deed ordinarily proves itself (*acta publica probant sese ipsa*), relieving the party relying on it from further evidentiary burden, but once that status is lost, the burden of proof reverts to the party holding the deed, who must then produce additional corroborating evidence to convince the judge. A deed stripped of its fingerprint safeguard is therefore not merely technically deficient; it loses the very mechanism that closes off an opposing party's ability to deny having appeared or signed, which is precisely the risk the 1869 downgrade is designed to expose.

Beyond the evidentiary consequence, the notary's neglect of this duty carries administrative exposure supervised by the tiered structure of the Notary Supervisory Council, from the Regional Council up through the Central Council. Under Article 85 UUJN, a failure to fulfill the Article 16 mandate is treated as unprofessional and careless conduct, and where a complaint or routine audit uncovers a *Minuta Akta* lacking the required fingerprint, the notary concerned may be summoned before a supervisory hearing. Depending on the degree of intent, the frequency of the lapse, and the extent of harm caused to the public, sanctions range from verbal or written warnings through temporary suspension of authority to practice, and in the most serious cases, a recommendation for dishonorable dismissal from office. Authority theory again clarifies why this exposure is proportionate rather than excessive: because the notary's power to certify deeds is attributive and delegated by the state, any failure to execute the state-mandated procedure is not merely a private lapse but a breach of the public trust underlying that delegation, which justifies escalating administrative consequences.

A further dimension of risk operates at the level of professional ethics. As a bearer of a position considered a *nobile officium*, the notary is bound by an oath enforced through the Honor Council of the Indonesian Notary Association, and inconsistent or discriminatory application of the fingerprinting requirement, for instance requiring it only of appearers perceived as less literate while excusing others, constitutes conduct unbecoming the dignity of the office. An adverse ethical ruling does not by itself revoke a notary's license, but it erodes standing among professional peers and undermines the confidence of institutional partners, particularly banks and financial institutions that rely on notarial deeds as collateral security, illustrating that the risk here is reputational and relational rather than purely formal.

Taken together, these three layers of risk, evidentiary, administrative, and ethical, are cumulative rather than alternative. A single omission of the fingerprint can simultaneously downgrade the deed's evidentiary force under the Civil Code, expose the notary to administrative sanction under UUJN, and

invite ethical censure under the profession's code of conduct. This cumulative structure confirms that fingerprinting cannot be regarded as a minor administrative add-on; it functions as the connective safeguard that legal certainty theory would expect of any formal requirement meant to close the gap between a party's stated will and the physical proof that such will was genuinely and personally expressed before the notary.

4. CONCLUSION

The legal basis obliging a notary to require fingerprinting rests firmly on Article 16 paragraph (1) letter c of the Notary Position Law, whose seemingly conflicting relationship with Articles 1 and 38 is resolved through the principle of *lex posterior derogat legi priori* and the demands of legal certainty theory: the signature expresses consent, while the fingerprint anchors the appearer's physical identity, making the two requirements complementary rather than contradictory. Failure to fulfill this obligation carries cumulative legal risk, degrading the deed's evidentiary force under Article 1869 of the Civil Code, exposing the notary to administrative sanction under UUJN, and inviting ethical censure from the profession's Honor Council, confirming that fingerprinting functions as an inseparable safeguard of authenticity rather than a mere administrative formality.

These findings carry meaning beyond the notarial office itself. A legal system in which the fingerprinting obligation is clearly grounded and consistently enforced strengthens public confidence in authentic deeds as instruments of certainty, reduces the volume of civil disputes rooted in identity denial, and reinforces accountability within a public-facing legal profession. In this way, resolving the norm conflict surrounding Article 16 UUJN contributes directly to the broader agenda of Sustainable Development Goal 16, which calls for effective, accountable, and transparent institutions as the foundation of a just and rule-of-law-based society.

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