

RESEARCH ARTICLE

Juridical Analysis on the Tax Compliance of Notary in Relation to Its Honorarium in the Perspective of the People's Welfare (Research Study at the Indonesian Notary Association of Batam City)

David Tan*, Jemmy Rumengan, Idham

Master of Notary Study Programme, Law Faculty Universitas Batam.

*Corresponding Author: David Tan

Abstract: In carrying out his duties and position as a civil law notary, especially in case of providing notariat legal services, civil law notary will naturally receive honorarium. Empirical data shows the compliance of civil law notary is still very low related to tax payment and report. From the background, the formulation of research questions can be drawn, among others: (1) How is the legal arrangement related to the taxation obligation of the notary in connection with the honorarium for legal services rendered? (2) How is the implementation of the notary's taxation obligation in connection with the honorarium for legal services rendered? (3) What factors constrain the notary taxation obligation in connection with the honorarium for legal services rendered? To answer the above questions, a juridical normative study approach was conducted backed by an empiric approach. To obtain the necessary legal materials, it is carried out by observation, interview, search, collection and library study on materials, laws and regulations, research results, scientific works and other written documents. Data obtained from the research is then analyzed descriptively in qualitative manner with several data are quantitatively analyzed. From the results of the study, there is a legal basis that becomes the basis for taxation regulation of the notary's honorarium, its implementation as well as the factors that constrain the tax compliance of Notary. It also provided advice to stakeholders, namely the legislature, executive, Indonesian Notary Association and subsequent researchers.

Keywords: *Tax Compliance, Notary, Income Tax, Indonesia.*

Article Received: 02 May 2020

Revised: 12 May 2020

Accepted: 23 May 2020

Background

Indonesia is a state of law (rechtsstaat or the rule of law) that upholds the supremacy of law. This is confirmed in the provisions of Article 1 paragraph (3) of the 1945 Constitution of the Republic of Indonesia which reads: "The State of Indonesia is a state of law".

Based on the constitutional and juridical basis mentioned above, the position of notary public officer (openbaar ambtenaar) was born as a position of authority to make an authentic deed and other authorities based on the law, in the place where the public official is authorized. Based on this authority, in essence the notary position is the state representative, that is, the state representative in civil matters. Given the complexity of civil affairs involving all the people of Indonesia which cannot be served

by the state alone, the state assigns positions with all its authority to the elected individual citizens, namely as public officials with the name of the notary public.¹ Notaries in their duties and authorities in providing legal services are entitled to receive an honorarium. Because the true honorarium is economic income for the notary allowed by the law, it is certain that the notary must also pay income tax on the honorarium in accordance with applicable regulations.

Notary in Indonesia increases every year in terms of quantity. Based on investigators' investigations, obedience from notaries is still very low when faced with tax obligations such as reporting and payment of income tax

¹ Bachrudin, "Jabatan Notaris di Indonesia dalam Jerat Liberalisasi", *Jurnal Pembaharuan Hukum* Volume II No. 2, May-August 2015, p. 185.

on honorarium. As explained by the Minister of Finance of the Republic of Indonesia, Sri Mulyani at the Dissemination of Tax Amnesty on November 23, 2016, where he claimed to be concerned about seeing tax data from advocates, notaries and curators. The reason is that none of these professions has a tax compliance rate above 50% (fifty percent). Notary profession based on data owned by the Directorate General of Taxes of the Republic of Indonesia, there are approximately 430,000 taxpayers (WP) from among notaries.

The Taxpayer Identification Number (NPWP) of the notary profession is recorded at only 14,686, while the Taxpayer Identification Number (NPWP) identified by the Directorate General of Tax of the Republic of Indonesia is only 11,314 notaries. The majority of notaries identified as having a Taxpayer Identification Number (NPWP) are in DKI Jakarta and its surroundings, approximately 5,700 notaries.

Sri Mulyani again explained that seen from the past five years, indications of reports on notary profession tax were only about 35% (thirty-five percent). But every year the trend is decreasing, from 39% (thirty nine percent) to 30% (thirty percent).² Growth in the number of notaries from time to time should have the meaning that the potential for state revenues through income tax paid by notaries should also increase.

Moreover, this increase took place exponentially. Therefore, as one of the strategic and potential sources of income to the country, it is time for a more beneficial regulatory system / regulation for all parties, especially for the state and notary office. This complexity in calculation, payment and reporting of tax notaries by researchers can result in a decrease in compliance and notary compliance with tax regulations.

As a general official appointed by the state, this will of course have a very negative impact on the notary public institution. Moreover, the notary public appointed by the state and a graduate of the law school should give a good example of obedience and compliance with tax regulations. Because it

involves the dignity of the notary public institution itself, then of course to measure the level of compliance of the notary will not be easy, let alone obtain the data from the notary himself. Researchers believe that although the tax law is coercive, no one wants to break the law if the law is fair and easy, this is specifically true of tax law. The position of a notary public is no exception to this, no notary would want to violate if tax regulations are fair, transparent and easy.

Based on the description of the background, there are three problems that will be examined. The formulation of the problems include are as following:

- How is the legal arrangement related to the taxation obligation of the notary in connection with the honorarium for legal services rendered?
- How is the implementation of the notary's taxation obligation in connection with the honorarium for legal services rendered?
- What factors constrain the notary taxation obligation in connection with the honorarium for legal services rendered?

Source of Literature

Overview of the Indonesian Notary

Notary is a general official authorized to make authentic deeds and other authorities as referred to in the law. Indonesian notary belong to latin notaries which according to Blacks are carrying out the task of serving the needs of the community in the private or civil sphere, and because notary is *amaneunsis*, only constrict what is said *Notarius* in Roman Law is *Draughtsman*, an *amaneunsis* is the person who records what is done by someone else or acknowledges what others have written. Latin notary attributes are person whose attitude and position are neutral and firm.

Notary may not make a deed if not requested. Notarial deed must be written and can and must meet the applicable laws and regulations. Viewed from its position, then a notary is tasked with carrying out part of the authority of the government. The legal actions contained in a notary deed are not legal actions of the notary, but are legal actions that contains actions, agreements and stipulations of parties who request or

²Hukumonline, "Memprihatinkan!! Kepatuhan Pajak Advokat, Notaris dan Kurator Rendah", <https://www.hukumonline.com/berita/baca/lt5836d2fdc73c1/me-prihatinkan-kepatuhan-pajak-advokat-notaris--dan-kurator-rendah/>, accessed on 20 August 2019.

want their legal actions to be stated on an authentic deed. So the parties to the deed are bound to the contents of an authentic deed. Notary is not an artisan making deed or a person who has a job of making a deed, but the notary in carrying out his office is based on or equipped with various legal sciences and other sciences which must be mastered in an integrated manner by a notary and deed made before or by a notary having the position of proof.³

The definition of a Notary Public based on the provisions of Article 1 number 1 of the Law of the Republic of Indonesia Number 2 of 2014 concerning Amendments to the Law of the Republic of Indonesia Number 30 of 2004 concerning the Position of Notary (hereinafter referred to as "UUJN") is "official general authorized to make an authentic deed and has other authorities as referred to in this law or under other laws".

At present throughout the world, there are three main types of notarial systems. Civil Law Notaries from Latin law countries, Common Law Notaries in English-speaking countries and Notarial Systems in North America which are derived from the British Common Law Notaries but with some differences. Notaries in Indonesia are included in the types of civil law notaries. Notaries in Common Law adherents are independent professionals while in Civil Law adherents, notaries are appointed by authorized officials so that they are an extension of governmental authority that helps with various tasks, especially in the civil field.

Then the notary authority in the Common Law is not as extensive as the authority of the Civil Law notary public.⁴ Notary has a very important role in the life of the nation and state because this institution has the authority to make an authentic deed⁵ and other deeds. To be able to exercise that authority, the notary must be appointed and appointed as a notary by the government, in this case the Minister of Law and Human Rights. The Ministry of Law and Human

Rights has set conditions that must be fulfilled by each prospective notary to be appointed as a notary public as determined in the applicable laws and regulations.⁶ Regarding a certain matter, it means that what will be agreed upon must be clear and detailed (type, amount and price) or information on the object, known the rights and obligations of each party so that no dispute occurs between the parties.

The reason (*causa*) is lawful. The word *kausa* is translated from the word *oorzaak* (Dutch) atau *causa* (Latin) which is meant in the case of this agreement does not mean something that causes someone to make an agreement, but refers to the content and purpose of the agreement itself. For example in a sale and purchase agreement, the content and purpose or power of attorney is the one who wants the property rights of an item, while the other party wants money.

Lawful clause mean that the content of the agreement do not conflict with the public order, decency and law.⁷ By fulfilling these four conditions, then an agreement becomes legal and legally binding for the parties who make it. The promised parties must intend that the agreement they make is legally binding. The court must be assured of the purpose of legally binding. Legally binding means that the agreement creates rights and obligations for parties that is recognized by the law.⁸

Overview on Authentic Deeds and Notarial Deed

A In general, the deed is a letter that is signed, contains information about events or things that are the basis of an agreement, it can be said that the deed is a writing with which stated a legal action. Authentic deeds are perfect evidence as referred to in Article 1870 of the Civil Code, it gives among the parties including his/her heirs or those who have the rights of the parties that is perfect evidence of what was done/stated in this deed. This means having the strenght of evidence in such a way because it is

³ Rahmad Hendra, "Tanggung Jawab Notaris terhadap Akta Otentik yang Penghadapnya Mempergunakan Identitas Palsu di Kota Pekanbaru", *Jurnal Ilmu Hukum Volume 3 Nomor 1*, 2014, pp. 6-11.

⁴ Freddy Harris and Leny Helena, *Notaris Indonesia*, PT Lintas Cetak Djaja, Jakarta, 2017, pp. 34-35.

⁵ Salim H.S., *Teknik Pembuatan Akta Satu (Konsep Teoretis, Kewenangan Notaris, Bentuk dan Minuta Akta)*, PT Rajagrafindo Persada, Jakarta, 2015, p. 22.

⁶ Salim H.S., *Uji Kompetensi Profesi Notaris*, Sinar Grafika, Jakarta, 2018, p. 1.

⁷ Tri Wahyu Surya Lestari dan Lukman Santoso, "Komparasi Syarat Keabsahan "Sebab yang Halal" dalam Perjanjian Konvensional dan Perjanjian SYariah", *Jurnal Hukum Islam Volume 2 Nomor 1*, 2017, halaman 7-8.

⁸ Evalina Yessica, "Karakteristik dan Kaitan antara Perbuatan Melawan Hukum dan Wanprestasi", *Jurnal Repertorium Volume 1 Nomor 2*, November 2014, p. 50.

considered to be attached to the deed itself so that it does not need to be proven again and for the judge it is “compulsory proof/necessity” (*Verplicht Bewijs*). Therefore, whoever states that the authentic deed is fake/false, he/she must prove the falsehood of the deed, therefore, authentic deeds have external proof power, formally and materially.

It is different from the party made deed which for the judge is free evidence because the new party made deed has the material evidence power after its formal strength has been proven, while the power of formal proof has only taken place, if the parties concerned know the truth of the contents and method of making the deed.⁹

Based on the description above, then the deed made authentically has a proof value of a deed that includes:

Strength of Authentic Proof (*Uitwendige Bewijskracht*)

The power of outward proof means that the deed itself has the ability to prove itself as an authentic deed.

Strength as a Formal Proof (*Formele Bewijskracht*)

In the formal sense, hence the certainty of the date of the deed is guaranteed, the truth of the signature contained in the deed, the identity of the person present (*comparanten*), as well as the place where the deed was made as long as a party deed, that the parties have explained as described in the deed, while the truth of the statements themselves is only certain between the parties themselves.

Strength as a Material Proof (*Materiele Bewijskracht*)

The contents of the information contained in the deed is valid as true, the content has certainty as it really is, is a legitimate piece of evidence between the parties and the heirs and recipients of the recipients of their rights, with the understanding: (a) that if the deed is used before the court is sufficient and that the judge is not permitted to ask for another proof of evidence beside it; and (b) that the contrary proof is always permissible with the usual evidentiary instruments permitted according to the law.

⁹ *Ibid.*, pp. 12-14.

Authentic deed are perfect evidence for both parties, this means that the contents of the deed by the judge are considered true as long as the untruth cannot be proven. Authentic deeds do not require recognition from the parties concerned in order to have the power of proof.

Legal Politics on the Reconstruction of Laws and Regulations

This commentary is limited to the relationship between political science and positive law, which is the study of law that applies in a society at a certain time. Sticking to the understanding of legal politics from Bellefroid, it can be stated that legal politics is part of legal science. This is because Bellefroid believes that legal science consists of 5 parts, each of which is the dogmatics of law, the history of law, comparative law, political law, general legal theory.¹⁰

Political law is part of the science of law that examines the changes that must be made in applicable law in order to meet the demands of people's lives. Thus legal politics discusses the direction of the development of a legal system. Legal politics builds *ius constituendum* from *ius constitutum* (which developed from the legal system of the past).¹¹

Bellefroid added that legal politics investigates what changes must be made to the existing law, in order to meet the new requirements of social life. Bellefroid continues the development of orderly law because it tries to make the *ius constitutum* developed from old legal systems, into *ius constituendum* or the law for the future (the law aspired). Legal politics seeks to make rules that will determine how humans should act, legal politics seeks to investigate what changes must be made in the current law to be compatible with social reality (*sociale werkelijkheid*).¹²

Methodology

Research to answer the problem is done by a juridical normative approach, namely research on legal principles (including legal notions, legal provisions of rules, norms, doctrines, jurisprudence and relevant official material). As a normative study, the focus of

¹⁰ Abdul Latif dan Hasbi Ali, *Politik Hukum*, Sinar Grafika, Jakarta, 2016, pp. 11-12.

¹¹ *Ibid.*, p. 57.

¹² *Ibid.*, pp. 19-20.

research to answer the problem lies in library research (secondary data in the form of primary legal materials, secondary legal materials and tertiary legal materials). To obtain legal materials needed, it is carried out by searching, collecting and reviewing library materials, legislation, research results, scientific works and other written documents.

Data obtained from the results of the study will then be analyzed qualitatively. This qualitative descriptive analysis examines legal material for further review in depth and interpreted to obtain the expected conclusions. From the results of the analysis it is expected that the results of descriptive research can be obtained which will provide an overview on the problems to be answered as listed out above.

Analysis and Discussions

The Legal Arrangement Related to the Taxation Obligation of the Notary

Notaries as one of the subjects of income tax fall into the subject of personal taxation. The position of an individual as a tax subject can reside or be in Indonesia or outside Indonesia. Individuals do not see age restrictions and also socioeconomic levels, in other words the same applies to all (non-discrimination).¹³

Specifically for the position of notary, of course, falls into this category because in carrying out his position is a public official appointed and appointed by the state personally, not as a body or permanent establishment. But of course in the context of the domestic tax subject because notaries actually carry out their activities in Indonesia, one and the other due to problems in the working area of a notary public.

Until now, the regulation regarding income tax refers to the Law of the Republic of Indonesia Number 7 of 1983 concerning Income Tax as amended several times, most recently by the Law of the Republic of Indonesia Number 36 of 2008 concerning the Fourth Amendment to the Law Republic of Indonesia Number 7 of 1983 concerning Income Tax (UU PPh). Notary profession is a unique occupation. The law gives authority to

the notary public as a public official to make a document in the form of a notarial deed.¹⁴

The Implementation of the Notary's Taxation Obligation

The basis for calculating taxation in Indonesia is bookkeeping and recording. Bookkeeping is the process of recording regularly to collect data and information about: the state of assets, liabilities or debts, capital, income and costs and the price of the acquisition and delivery of goods / services. Bookkeeping is closed by preparing a financial statement in the form of a balance sheet and profit and loss calculation at the end of each tax year.

Bookkeeping must be held by corporate taxpayers and individual taxpayers who carry out activities / free work (with gross circulation above 600 million rupiah a year). Recording is the regular collection of data about gross circulation and / or revenue receipt as a basis for calculating the amount of tax owed. Recording can be done by individual taxpayers who are allowed to use the net income calculation norm, namely individual taxpayers whose gross circulation is below six hundred million rupiahs a year.¹⁵

Notary according to the provisions of Article 4 paragraph (1) letter a of the Income Tax Law above, is included in one type of work that is classified as free work (vide Explanation of Article 4 paragraph (1) of the Income Tax Law). Free employment is work carried out by individuals who have special expertise in an effort to earn income that is not bound by a work relationship.

More specifically (as the *lex specialis*) regulated further in the Director General of Taxes Number: PER-17 / PJ / 2015 concerning Norms of Net Income Calculation, the implementation of Notary taxation can be done in 2 (two) forms, namely:

- Notary Conducting Bookkeeping, for notary who holds bookkeeping is a notary who, in carrying out his duties and authority, has a gross circulation in one year exceeding Rp. 4,800,000,000.00 or less, but chooses to hold bookkeeping.

¹³ Erly Suandy, *Hukum Pajak*, Salemba Empat, Jakarta, 2017, p. 44.

¹⁴ Herlien Budiono, *Demikian Akta Ini: Tanggung Jawab Mengenai Pembuatan Akta Notaris di dalam Praktik*, PT Citra Aditya Bakti, Bandung, 2018, p. 1.

¹⁵ Erly Suandy, *Op. Cit.*, p. 195-196.

- Notary Conducting Recording, The notary who organizes records is a notary who, in carrying out his duties and authority, has a gross circulation of less than Rp 4,800,000,000.00 in 1 year. This is specifically regulated in Regulation of the Director General of Tax Number: PER-17 / PJ / 2015 concerning Norms of Calculation of Net Income. Recording is an obligation that must be done by taxpayers who do free work but do not keep books

Some input received from the notary public as the taxpayer mentioned above, added with various obstacles faced by the notary public, such as the amount of Article 25 PPh payment depends on the amount of PPh owed last year. Where it does not rule out the possibility that it can be projected in the current year there will be a decrease in profit (Taxable Income), so if we repay Article 25 of Income Tax which amount is based on last year then it is possible at the end of the year there will be an overpayment of taxes. This is caused if there is an overpayment of tax which, although it can be substituted, but previously the taxpayer will be subject to inspection.¹⁶

To answer the problem of the relevance of special tax regulations on this notary honorarium, researchers used the view of Progressive Legal Theory by Satjipto Rahardjo as the basis for analysis. Moving on from the great thought of progressive law Satjipto Rahardjo, researchers consider that the legal view rejects order in taxation which will only work through state institutions. Awareness of tax regulations can not only be created through regulations enforced by taxation institutions, but also awareness of humans (taxpayers) themselves.

However progressive legal thinking is to protect all Indonesian people in general with the aim of going towards the ideal of law. As a positive legal view that does not want to make law as a technology that has no conscience, but rather a moral institution, then efforts must be made to "humanize" the law. The law must learn from the processes of human life. The established law must pay attention to the conditions and processes of human life in an agile manner. Therefore, each tax regulation product that is promulgated must reflect the circumstances

as much as possible to contribute and benefit to humans themselves. This view is also inspired by progressive law that is pro-people, meaning that the law formed is the law that is on the side of the people, not on the side of the authorities.

Factors that Constrain the Notary's Tax Compliance

Based on the results of research conducted independently by researchers of 38 respondents who are notaries in Batam, where descriptive statistics show that from 38 samples taken as many as 97.4% of respondents did not pay and report their taxes independently and 68.4% of respondents did not understand how to pay and report taxes. This descriptively shows that the level of tax obedience of Notaries in Batam City is still very low.

The factors that are assumed to influence the level of tax obedience of Notaries in Batam City are tax regulation and tax facilities. Therefore, an instrument was designed to test whether the independent variables (tax regulation and tax facilitation) simultaneously and individually influence the dependent variable (tax compliance) of Notary in Batam City, along with the level of significance of the influence of the independent variable on the dependent variable.

Furthermore, the perception recorded through a questionnaire instrument which after processing the data using IBM SPSS Statistics Version 23 shows a regression analysis that identifies key variables that have an influence on the dependent variable (tax compliance). These variables are the tax regulation variable and the tax ease variable as an independent variable.

Regression results indicate that the variable tax regulation and tax ease is very influential on the level of notary tax compliance. The results of the F Test (Simultaneous Test / ANOVA Test) showed a significance number of 0.003 (<0.05) so that it can be concluded that the independent variables (tax regulation and tax ease) simultaneously had a significant effect on tax compliance as the dependent variable.

¹⁶ Erly Suandy, *Perencanaan Pajak, Op. Cit.*, p. 135.

Table 4.1: below shows the analysis of the results of the F Test regression (Concurrent Test/ANOVA Test).

ANOVA ^a						
Model		Sum of Squares	df	Mean Square	F	Sig.
1	Regression	2.575	2	1.288	6.783	.003 ^b
	Residual	6.644	35	.190		
	Total	9.219	37			
a. Dependent Variable: Ketaatan_Pajak						
b. Predictors: (Constant), Regulasi_Pajak, Kemudahan_Pajak						

T test which examines how the influence of each independent variable individually / each affects the dependent variable, also shows the results that each independent variable significantly influences the dependent variable. Evidenced by the results of the regression which shows that the value of Sig. (Significance) The tax regulation variable is 0.028 and the tax ease variable is 0.046 (value less than 0.05). Therefore, it can be concluded that each tax regulation variable and tax ease variable significantly influence the level of Notary tax compliance (as the dependent variable)

Table 4.2 below shows the results of the t-test regression (partial test).

Coefficients ^a								
Model		Unstandardized Coefficients		Standardized Coefficients	t	Sig.	Collinearity Statistics	
		B	Std. Error	Beta			Tolerance	VIF
1	(Constant)	3.658E-16	.241		.000	1.000		
	Kemudahan_Pajak	.260	.137	.406	1.896	.046	.448	2.230
	Regulasi_Pajak	.098	.138	.151	.706	.028	.448	2.230
a. Dependent Variable: (Total_Ketaatan_Pajak)								

The test results above show that the factors / variables of tax regulation and tax compliance simultaneously have a significant effect on tax compliance and each independent variable (tax regulation and tax compliance) significantly influences tax compliance (tax compliance) as a variable dependent

Closing

The implementation of tax regulations related to income tax paid by the notary that has been received has referred to the regulation concept in the Income Tax Law that has been in force since 1983. The implementation of the draft regulation continues today and the constraints faced are always the same from the year to year. Constraints faced are related to the implementation and implementation of tax regulations.

There are several factors which become obstacles in implementing and maximizing the potential of Notary tax receipts through increased notary tax compliance, one of which is the ease in tax reporting and tax regulation. To improve tax regulation, it can be done by referring to the politics of law as a process to try to make the *ius constitutum* developed from old legal systems, become *ius constituendum* or the law for the future (envisioned law).

Therefore, the true reconstruction process is also a process of legal politics which, of course, must pay attention to the philosophical paradigm (constitutional of paradigm), the state constitution and Indonesia as a rule of law (juridical of paradigm). Reconstruction of tax regulations related to honorarium received by a notary can be done by focusing on 3 (three)

components of an important legal system according to Lawrence M. Friedman's Legal System Theory, namely legal substance, legal structure and culture / legal culture.

References

1. Abdul Latif dan Hasbi Ali (2016) *Politik Hukum*, Sinar Grafika, Jakarta,.
2. Bachrudin (2015) "Jabatan Notaris di Indonesia dalam Jerat Liberalisasi", *Jurnal Pembaharuan Hukum* II: 2.
3. Erly Suandy (2017) *Hukum Pajak*, Salemba Empat, Jakarta,.
4. Evalina Yessica (2014) "Karakteristik dan Kaitan antara Perbuatan Melawan Hukum dan Wanprestasi", *Jurnal Repertorium*, 1 Nomor 2.
5. Freddy Harris, Leny Helena (2017) *Notaris Indonesia*, PT Lintas Cetak Djaja, Jakarta,.
6. Herlien Budiono, *Demikian Akta Ini* (2018) *Tanggung Jawab Mengenai Pembuatan Akta Notaris di dalam Praktik*, PT Citra Aditya Bakti, Bandung,.
7. Hukumonline (2019) "Memprihatinkan!! Kepatuhan Pajak Advokat, Notaris dan Kurator Rendah", <https://www.hukumonline.com/berita/baca/lt5836d2fdc73c1/memprihatinkan->

kepatuhan-pajak-advokat--notaris--dan-kurator-rendah/, accessed on 20.

8. Rahmad Hendra (2014) “Tanggung Jawab Notaris terhadap Akta Otentik yang Penghadapnya Mempergunakan Identitas Palsu di Kota Pekanbaru”, *Jurnal Ilmu Hukum* 3 Nomor 1.
9. Salim HS (2015) *Teknik Pembuatan Akta Satu (Konsep Teoretis, Kewenangan Notaris, Bentuk dan Minuta Akta)*, PT Rajagrafindo Persada, Jakarta,.
10. Salim HS (2018) *Uji Kompetensi Profesi Notaris*, Sinar Grafika, Jakarta,.
11. Tri Wahyu Surya Lestari dan Lukman Santoso (2017) “Komparasi Syarat Keabsahan “Sebab yang Halal” dalam Perjanjian Konvensional dan Perjanjian SYariah”, *Jurnal Hukum Islam*, 2: 1.