



Received: December 12, 2024

Revised: January 30, 2025

Accepted: February 01, 2025

\*Corresponding author: Umami Maskanah, Department of Law Science, Faculty of Law, Universitas Pasundan, Bandung, Indonesia.

E-mail: [ummi.maskanah@unpas.ac.id](mailto:ummi.maskanah@unpas.ac.id)

DATA IN SUMMARY | LAW, POLITICS, PUBLIC ADMINISTRATION

## Legal Power of Proof of Auction Minutes Deed in Electronic Implementation

Umami Maskanah<sup>1\*</sup>, Siti Nurhasanah<sup>2</sup>, Muhammad Akhmal Avshary<sup>3</sup><sup>1,2,3</sup>Department of Law Science, Faculty of Law, Universitas Pasundan, Bandung, Indonesia.Email: [ummi.maskanah@unpas.ac.id](mailto:ummi.maskanah@unpas.ac.id)<sup>1\*</sup>, [sitinurhasanah424@gmail.com](mailto:sitinurhasanah424@gmail.com)<sup>2</sup>, [akhmalavshary@gmail.com](mailto:akhmalavshary@gmail.com)<sup>3</sup>

**Abstract:** An auction is an act of buying and selling, where there are elements of price and goods; the difference is that the auction requires the presence of an auction official, with the stipulation of PMK 122/2023 concerning the implementation of electronic auctions, the auction can be carried out without the presence of an auction official, with the absence of the auction official contradicting the validity and strength of the auction minutes deed which still creates doubts for the auction winner in the implementation of the electronic auction. This study uses normative legal research that analyzes applicable laws and regulations and is applied in some legal issues by analyzing statutes and regulations relating to legal protection and electronic auctions; the results of the study obtained are the validity and legal force of the auction minutes deed can still be accepted as an authentic deed because it can be accounted for and the truth of the authentic deed by the auction official without deviating from the provisions of applicable laws and regulations.

**Keywords:** Auction Minutes Deed, Electronic Auction Proof, Legal Validity.

### 1. INTRODUCTION

An auction is an act of buying and selling, but buying and selling carried out with an auction system is different from buying and selling in general; buying and selling is generally carried out at an objective price that the seller has previously determined then the buyer will bid the price to be cheaper or below the price offered and the seller can maintain the highest price or consider the price given by the buyer. (Liju & Budiono, 2021). The auction system is a sale by way of price offers by enthusiasts or called auction participants, with multiples of prices up or down led by an auction official often referred to as Vendemeester. (Astriani & Ngadino, 2022). The Regulation of the Minister of Finance Number 122 / PMK.06 / 2023 has regulated the auction system concerning Auction Implementation Guidelines referred to as PMK No. 122/2023. Along with advancing technology and information in society, the auction system has also developed, which can be implemented based on the Internet. (Mulyani & Haliza, 2021). The Internet auction system, or electronic auction, makes everything more transparent, effective, and efficient for parties wanting to run an electronic auction. The implementation of the electronic auction system has been implicitly regulated in the provisions of Article 1 number 14 of PMK No. 122/2023, which states that: "An Auction Without the Presence of Participants is an Auction that is not physically attended by Bidders at the Auction location or is carried out via postal drum letter, electronic mail, Auction Application or e-Marketplace Auction." Indicating an auction without participants, namely an auction whose implementation is carried out via the Internet using the Auction Application or e-marketplace Auction facilities.

The practicality of electronic auctions is that they can be carried out anywhere and anytime for auction participants by using the auction application facility or e-Marketplace Auction, which has been regulated in article 1 number 23 of PMK No. 122/2023, which states, "Electronic Auction Market (e-Marketplace Auction) is an electronic market to facilitate the sale and purchase of Goods through Auction." Article 1 number 24, "Electronic Market Providers hereinafter referred to as e-

Marketplace Providers are parties, both individuals, bodies, or permanent business entities that reside or are domiciled or have business activities within the territory of the Unitary State of the Republic of Indonesia that provide e-Marketplace." The state has provided an e-marketplace to implement electronic auctions; these facilities have been provided by the Ministry of Finance, including e-Auction ([www.lelang.go.id](http://www.lelang.go.id)). In the implementation of an auction that is running an electronic auction, the auction winner does not face anyone in its implementation and agrees on paper, which is usually done in conventional auctions, and does not even face the auction implementers, namely the bailiff and auction officials. Because it has been regulated regarding regulations regarding auctions without the presence of participants in the electronic auction process but does not regulate the validity and authenticity of the auction minutes deed, which raises questions for the auction winner regarding the legal force of the auction minutes deed received (Krisnha Wardhana et al., 2021). Therefore, this study focuses on the analysis of the legal force for auction winners against the regulations that have been implemented in Indonesia, namely based on PMK 122/2023, which is considered still unable to provide legal force for auction deeds because, in practice, many auction winners who have acted in good faith have received lawsuits from third parties. Thus, this study is expected to provide several recommendations to improve regulations in electronic auction practices and provide better legal protection for the parties involved, especially for auction winners who act in good faith.

The latest regulation, namely PMK 122/2023 concerning Auction Implementation Guidelines, is expected to provide stronger and clearer legal protection for auction winners or auction parties, as well as legal certainty in the implementation of electronic auctions because, in the implementation of electronic auctions, challenges that include technical, regulatory socialization and understanding can hinder efficiency and public trust in electronic auctions. Based on this description, electronic auction activities often cause dissatisfaction with the auction implementers, including the validity of the auction minutes as an authentic deed and the legal force of proof of the auction minutes in implementing electronic auctions.

## 2. LITERATURE REVIEW

### 2.1. Auction Minutes Deed

The Auction Minutes Deed is an official document containing the entire series of processes and results of an auction carried out per legal provisions (Abdul Manan, 2017). This document is prepared by an official with the authority to ensure transparency and legality of the auction process (Minister of Finance Regulation No. 27/PMK.06/2016). In practice, this deed contains important information, such as the identity of the auction participants, details of the auction object, price offers, and the final results of the auction (Civil Code Article 1868). As authentic evidence, the Auction Minutes Deed has three main functions: (1) Proving that the auction has complied with applicable legal provisions (Civil Code Article 1868); (2) Being an official record of the auction results that binds the parties concerned (Abdul Manan, 2017); (3) Making this deed a legal document to resolve disputes (Law No. 19 of 2016 concerning ITE).

### 2.2. Legal Regulations in Indonesia

Regulations regarding Auction Minutes Deeds are regulated in various regulations in Indonesia, including:

1. Civil Code (KUH Perdata) Article 1868 States that an authentic deed is a document made by an authorized official with full legal force and valid evidence (KUH Perdata Article 1868).
2. Law No. 19 of 2016 concerning Information and Electronic Transactions (ITE): Recognizes electronic documents as valid evidence so that Auction Minutes Deeds in electronic form also have legal validity (Law No. 19 of 2016 Article 5 Paragraph 1).

3. Regulation of the Minister of Finance No. 27/PMK.06/2016: Regulates the procedures for implementing auctions, including publishing auction minutes in digital format (PMK No. 27/PMK.06/2016 Article 20).

### 2.3. Role of Auction Officials

Auction Officials are primarily responsible for ensuring that the Auction Minutes Deed is made per applicable legal procedures (PMK No. 27/PMK.06/2016 Article 5). Their roles include: (1) Ensuring that all participants meet the requirements and that the auction is conducted transparently (PMK No. 27/PMK.06/2016 Article 7); (2) Recording all facts during the auction process, including price offers and final decisions (Civil Code Article 1868); (3) Producing documents with formal and material evidentiary power (Abdul Manan, 2017). In the context of electronic auctions, auction officials are also tasked with supervising the integrity of the electronic system used, ensuring data security, and guaranteeing the validity of electronic documents (Law No. 19 of 2016 Article 11).

### 2.4. Electronic Auction

Electronic auction is an auction process conducted through a digital system to increase transparency, efficiency, and accountability (Minister of Finance Regulation No. 27/PMK.06/2016 Article 2). This process is regulated in Minister of Finance Regulation No. 27/PMK.06/2016, which emphasizes that the implementation of electronic auctions uses an official platform that allows remote participation, such as e-Auction (PMK No. 27/PMK.06/2016 Article 3).

### 2.5. Security and Legality

The electronic auction system is equipped with technologies such as authentication, data encryption, and electronic signatures to ensure the validity of the process and the documents produced (Law No. 19 of 2016 Article 5 Paragraph 1). Electronic documents produced from the auction are also recognized as valid evidence according to the ITE Law Article 11 concerning certified electronic signatures. This guarantees legal validity for the auction results that are recorded digitally (ITE Law Article 12).

### 2.6. Challenges and Solutions

The main challenges faced in electronic auctions include; Threats of data manipulation or unauthorized access to the auction system (Abdul Manan, 2017); Vulnerability to cyber attacks that can affect the integrity of systems and documents (UU ITE Article 26). Barriers to access for those who are less technologically literate, especially in areas with limited infrastructure (PMK No. 27/PMK.06/2016 Article 17). Solutions to overcome these challenges include: (1) Improving the quality of networks and software to ensure the security and smoothness of electronic systems (Abdul Manan, 2017); (2) Increasing Digital Literacy: Training the public and business actors on electronic auction platforms (UU No. 11 of 2008 concerning ITE Article 36); (3) Adopting regulations that are adaptive to technological developments and creating a stricter audit system to prevent deviations (PMK No. 27/PMK.06/2016 Article 22).

### 2.7. Legal Power in Electronic Systems

Law Number 19 of 2016 concerning Electronic Information and Transactions (ITE Law) provides a legal basis for recognizing electronic documents as valid evidence in court (ITE Law Article 5 Paragraph 1). This means that electronic documents, including electronic auction minutes, have the same legal standing as physical documents as long as they meet the requirements of authenticity

and integrity stipulated in the ITE Law Article 6. The electronic auction minutes deed becomes valid because the digital platform used has been verified and supervised by related institutions, such as the Directorate General of State Assets (DJKN), which runs an electronic-based auction system based on the Regulation of the Minister of Finance No. 27/PMK.06/2016 Article 5 Paragraph 1.

### 2.8. Non-Repudiation Principle

The principle of non-repudiation in electronic documents ensures that the parties involved cannot deny their involvement in the auction process or the validity of documents that have been electronically signed (UU ITE Article 16). In the context of auction minutes, this ensures that the entire auction process is recorded transparently and cannot be changed by any party. This principle applies thanks to electronic signature technology and digital certificates issued by official electronic certification organizers (UU ITE Article 11 Paragraph 1). With this technology, every action in the electronic system leaves a digital footprint, thus providing full accountability to all parties involved.

### 2.9. Electronic Signature

As stipulated in Article 11 of the ITE Law, a certified electronic signature has the same legal force as a wet signature. The electronic signature is issued by an Electronic Certification Organizer (PSrE) recognized by the government. In the electronic auction minutes, this signature ensures the document's authenticity and is legally binding on all parties registered in the auction process. The validity of the electronic signature is strengthened by cryptographic technology, which guarantees data integrity so that it cannot be changed after the document is signed (ITE Law Article 12 Paragraph 1). Thus, the electronic auction minutes fulfill the formal legality aspect and protect the document's substance from potential manipulation.

## 3. RESEARCH DESIGN AND METHOD

This study uses a normative legal research method, namely an approach that analyzes applicable laws and regulations and their application in solving some legal issues. Normative legal research is conducted by studying and examining various relevant regulations, legal doctrines, and legal principles that underlie the issues discussed.

### 3.1. Research Approach

The approaches used in this study are:

1. Statute Approach: Conducted by reviewing various regulations governing legal protection and the implementation of electronic auctions. This approach aims to:
  - a. Identify the legal basis that supports the validity of electronic auctions, including the recognition of electronic documents as valid evidence (Law No. 19 of 2016 concerning ITE).
  - b. Assess the consistency and suitability of existing regulations, such as the relationship between the Civil Code, the ITE Law, and the Regulation of the Minister of Finance No. 27/PMK.06/2016.
2. Conceptual Approach: Used to understand the legal concept related to auction minutes, the evidentiary power of electronic documents, and the application of legal principles, such as the principle of non-repudiation.
3. Case Approach: This study can also refer to court decisions or real cases related to electronic auction disputes to test the application of the rules in practice.

### 3.2. Legal Materials Used

1. Primary Legal Materials
  - a. Civil Code, especially Article 1868, concerning authentic deeds.
  - b. Law No. 19 of 2016 concerning Electronic Information and Transactions (ITE).
  - c. Regulation of the Minister of Finance No. 27/PMK.06/2016 concerning Auction Implementation Guidelines.
2. Secondary Legal Materials
  - a. Books, scientific journals, and literature that discuss the legal concept of electronic document protection and auctions. Example: *Legal Aspects of Electronic Auctions* by Abdul Manan (2017).
  - b. Opinions of legal experts on recognizing electronic documents as valid evidence.
  - c. Documents related to best practices in the implementation of electronic auctions.
3. Tertiary Legal Materials  
Legal dictionaries, encyclopedias, and other sources that support understanding of the legal concepts used.

### 3.3. Research Objectives

This method aims to find:

1. A firm legal basis in supporting the implementation of electronic auctions in Indonesia.
2. Harmony of regulations related to the implementation of electronic auctions, especially in the context of recognizing electronic documents as evidence.
3. Solutions to legal and technical obstacles in implementing electronic auctions.

## 4. RESULT AND DISCUSSION

Auctions via the internet media, auctions via the internet, or e-auctions are regulated in Article 1 number 1 of the Regulation of the Minister of Finance of the Republic of Indonesia Number 122/2023; auctions via the internet are Sales of goods that are open to the public with written price offers without the presence of auction participants to achieve the highest price carried out through internet-based auction applications. *Vendu Reglement* or VR, which is still valid as the legal basis for auctions, states: "Public sale is an auction or sale of goods conducted to the public with an increased or decreased bid price or with the entry of the price in a sealed envelope, or to people who are invited or previously notified of the auction or sale, or are permitted to participate, and are allowed to bid the price, agree to the offered price or enter the price in a sealed envelope. M. Yahya Harahap defines an auction as a public sale, namely an auction and sale of goods held in public with increasing price offers, with increasing price agreements, or with price registration, or where people who are invited or previously informed about the auction or sale or the opportunity given to people who are auctioning or buying to bid on the price, agree on the price or register. In auctions, five principles are the basis for the implementation of auctions, including:

1. The principle of openness requires all levels of society to know about the auction plan and have the same pleasure in participating in the auction as long as it is not prohibited by law. Therefore, every auction must be preceded by an auction announcement.

2. The principle of competition means that in the auction process, each participant or bidder is given the same opportunity to compete in submitting the highest price bid or at least reaching and/or exceeding the limit value of the goods to be auctioned and determined by the seller or owner of the goods. The auction official authorizes the highest bidder of the goods to be auctioned as the buyer.
3. The principle of justice implies that when the auction process is carried out, it must be able to fulfill a sense of justice proportionally for each interested party. This principle prevents the Auction Officer from taking sides with certain auction participants or siding only with the seller's interests. Precisely, in the implementation of an execution auction, the seller may not determine the limit price arbitrarily, which results in losses for the executed party.
4. The principle of legal certainty requires that the auction that has been carried out guarantees legal protection for interested parties in implementing the auction. Each auction implementation is carried out with an auction report made by the auction official, which is an authentic deed. The auction report by the auction official is an authentic deed. The auction report is used by the seller/owner of the goods, the buyer, and the auction official to defend and carry out their rights and obligations.
5. The principle of efficiency will ensure that the auction is carried out quickly and at a relatively low cost because the auction is carried out at a predetermined place and time, and the buyer is confirmed at that time
6. The principle of accountability requires that the auction carried out by the auction official be accountable to all interested parties. The accountability of the auction official includes auction administration and auction money management.

In the implementation of the auction, there are two ways of bidding in writing without participants: electronic auctions, namely through open bidding and closed bidding. The submission of auction bids without the presence of participants based on Article 72 paragraph (4) of PMK 122/2023 concerning Auction Implementation Guidelines is carried out through:

- a. postal drum letter;
- b. electronic mail;
- c. Auction Application with open bidding or closed bidding; or
- d. e-Marketplace Auction.

The development of technology and information has had a significant impact, including in the world of trade, one of which is buying and selling by auction. One aspect affected is the auction system, where transactions are carried out electronically. With the Minister of Finance Regulation Number 122/2023 issuance concerning Auction Implementation Guidelines, which has revoked the previous regulation, Revoking the Minister of Finance Regulation Number 213/2020, the auction process has also adapted to the development of electronic auction trading transactions. The response to electronic auction systems has proven favorable. The digitization of auctions in this latest regulation provides various significant benefits for all parties involved. Here are some of the benefits that can be felt from the policy of adapting technology in electronic auctions:

1. Digitizing auctions allows the auction process to run more efficiently. Bidders can access information about the goods or services being auctioned online, place bids, and participate in the auction process without being physically present. This saves time and travel costs for participants.
2. With an electronic auction platform, bidders can participate without being limited by geographical boundaries. Anyone from any location can participate in an auction held elsewhere. This expands the market reach and increases competition, which can provide optimal results for sellers and buyers.
3. Digitizing auctions provides higher transparency in the auction process. All participants can easily access information about the goods or services being auctioned, bids submitted, and auction results. In addition, transaction security can also be enhanced with the use of sophisticated encryption and authentication technologies.

4. Digitizing auctions can reduce costs associated with physical auctions, such as printing costs for auction minutes, running the auction venue, transportation, and accommodation—this benefits auction organizers and participants, who can efficiently utilize their resources.
5. Digitizing auctions drive innovation in developing more sophisticated auction platforms. Using technologies such as artificial intelligence (AI) and data analytics can provide additional benefits in price prediction, more innovative bidding, and better decision-making.

With electronic auctions that have a positive impact, of course, in the implementation of electronic auctions, an auction official is still needed whose function is to lead the auction and make the auction minutes deed because the auction official has duties and responsibilities in the implementation of the auction that is carried out. The auction official is an important element in the implementation of the auction, which is stated in article 26 of PMK 122/2023: "Every Auction must be carried out by and/or in the presence of the Auction Official unless otherwise specified by Law or Government Regulation." Without an auction official, there will be no auction minutes deed. The Auction Minutes Deed is proof that a sale and purchase has taken place through an auction that has been carried out, proven by an authentic deed as referred to in Article 1 number 34 of PMK 122/2023: "The Auction Minutes are minutes of the Auction implementation made by the Auction Official which is an authentic deed and has perfect evidentiary force. The auction minutes deed issued by the Auction Official is an authentic deed or in the form of an Auction Minutes Deed; it must fulfill the elements of an authentic deed as regulated by Articles 1868 and 1870 of the Civil Code. The Auction Minutes are made to record the agreement of the auction seller and buyer at the obligatory agreement stage. Therefore, the auction official is required to be responsible for his duties, one of which is making an auction minutes deed; in this case, it is required to have three evidentiary powers in an authentic deed, namely:

1. The Auction Minutes must have the power of external proof.

The Auction Minutes must fulfill the elements of an authentic deed as regulated in Articles 1868 and 1870 of the Civil Code; the Auction Minutes have three authentic elements, which are required by Article 1868 of the Civil Code.

- a. The form of the Auction Minutes has been regulated in Articles 37, 38, and 39 of the Vendu Reglement.
  - b. The Auction Minutes are made before the Auction Official as a General Official regulated in Article 1a of the Vendu Reglement.
  - c. An authorized Auction Official must make the auction according to his/her territory regulated in Article 7 of the Vendu Reglement.
2. Auction Minutes that have material evidentiary power (*materiele bewijskracht*).  
The information in the auction minutes is accurate, so when used as evidence in court, it is considered sufficient, and the judge is not permitted to request other evidence.
  3. Auction Minutes that have formal evidentiary power (*formele bewijskracht*)  
The auction official is responsible for making a deed of auction minutes that guarantees the truth/certainty of the auction date, the signatures of the parties in the minutes that have been regulated in the legislation, the identities of the people present at the auction, namely the seller, mentioning the auction participants and auction buyers, as well as the place where the auction sale is held in presence or absence.

Based on Article 1869 of the Civil Code, "when an authentic deed is done by a public official who is not authorized to do so, the deed no longer has the power of proof as an authentic deed, namely perfect power of proof but only has the power of proof underhand." Of course, the making of a deed of auction minutes has been regulated in chapter 7 concerning auction minutes of PMK

122/2023 concerning auction instructions; if the form of the deed deviates from the regulations of PMK 122/2023, the power of proof of the authentic deed becomes a word underhand or is said to be downgraded, the authentic deed of auction minutes becomes absolute proof regarding the electronic auction incident, and the proof is considered valid in court. However, because the auction is carried out electronically, the auction official is not present or does not deal with the auction directly or without the auction official; the evidence used as a substitute for the auction minutes is proof of the transaction. Moreover, the proof of the transaction must be made in electronic form and has been regulated in Article 28 of Government Regulation Number 80 of 2019 concerning Trading Through Electronic Systems, referred to as PP PMSE, which states that electronic transaction evidence is valid evidence and binds the parties, and PMK 122/2023 Article 101 paragraph (2) states "Excerpts/Copies/Grosse Auction Minutes as referred to in paragraph (1) can be made and stored in the form of physical documents or electronic documents" that the auction winner can save a copy of the auction minutes deed in electronic form with a supporting application system. Of course, with this, evidence of PMSE and PMK 122/2023 has become evidence of legal force for electronic auction minutes deeds, which can be used as other evidence in procedural law and cannot be rejected as evidence in court, even though the auction minutes deed document is in electronic form. With the above, the Auction Minutes remain authentic as long as no one files a lawsuit later. If the parties file a lawsuit against the Auction Minutes and it can be proven untrue, it can be canceled. If there is a case regarding the denial of the Auction Minutes, then what is denied must be proven, whether there are things that are not by the procedures determined in the provisions of laws and regulations, including being able to prove that there are violations of the external aspects, formal aspects, and material aspects of the Auction Minutes. The burden of proof regarding what is denied is borne by the party denying it.

## 5. CONCLUSION

According to the Author, the Validity of the Auction Minutes Deed as an Authentic Deed in the Implementation of Electronic Auctions has fulfilled the elements contained in Article 1868 of the Civil Code. It is categorized as an authentic deed and used as evidence for the court, even without the presence of the auction winner in front of the auction official in reading the auction minutes deed because it has been regulated in PMK 122/2023. The auction minutes deed remains authentic as long as no one sues in the future. Because of the authentic deed, if a party files a lawsuit regarding the auction minutes deed, the auction official does not need to explain it to the party. However, the party filing the lawsuit needs to prove, regarding matters not by the legislation, violations of the formal and material aspects of the auction minutes deed, and are charged to the party who denies this.

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