

ABSTRAK

Notaris merupakan pejabat publik yang berperan penting dalam menjamin kepastian hukum melalui pembuatan dan autentikasi akta. Meskipun Indonesia dan Korea Selatan sama-sama berada dalam tradisi *civil law*, pengaturan jabatan notaris di kedua negara menunjukkan perbedaan karakteristik, sementara Florida (Amerika Serikat) menghadirkan model khusus melalui keberadaan *Civil-Law Notary* di dalam sistem *common law*. Penelitian ini bertujuan untuk menganalisis dan membandingkan pengaturan notaris di Indonesia, Korea Selatan, dan Florida ditinjau dari aspek persyaratan pengangkatan, masa jabatan, dan organisasi kenotariatan. Metode yang digunakan adalah penelitian hukum normatif-empiris dengan pendekatan perbandingan hukum, melalui studi kepustakaan dan wawancara dengan praktisi notaris. Hasil penelitian menunjukkan bahwa Indonesia menekankan jalur pendidikan kenotariatan dan mekanisme pengawasan berlapis, sementara Korea Selatan dan Florida lebih menitikberatkan pengalaman praktik hukum, pola perpanjangan kewenangan berbasis kelayakan, serta pengawasan yang lebih langsung oleh otoritas negara. Berdasarkan temuan tersebut, penelitian ini merekomendasikan penguatan pengaturan notaris di Indonesia melalui penyesuaian kualifikasi pengangkatan, penyederhanaan mekanisme perpanjangan masa jabatan tanpa kewajiban pembayaran, serta penguatan pengawasan disipliner yang lebih efektif di bawah otoritas negara.

Kata Kunci: *notaris, perbandingan, pengangkatan, jabatan, organisasi, civil law, common law*

ABSTRACT

Notaries are public officials who play a crucial role in ensuring legal certainty through the drafting and authentication of authentic deeds. Although Indonesia and South Korea both belong to the civil law tradition, the regulation of the notarial profession in these countries exhibits distinct characteristics, while Florida (United States) presents a specific model through the existence of Civil-Law Notaries within a common law system. This research aims to analyze and compare the regulation of notaries in Indonesia, South Korea, and Florida with regard to appointment requirements, term of office, and notarial organization. The study employs a normative–empirical legal research method with a comparative law approach, based on statutory analysis and interviews with notarial practitioners. The findings reveal that Indonesia emphasizes formal notarial education and layered supervisory mechanisms, whereas South Korea and Florida place greater emphasis on prior legal practice experience, eligibility based continuation of authority, and more direct state supervision. Based on these findings, this research recommends strengthening the Indonesian notarial system through the adjustment of appointment qualifications, simplification of term extension mechanisms without payment obligations, and the enhancement of a more effective state centered disciplinary supervision

Keywords: *Notary, comparison, appointment, tenure, organization, civil law, common law*