


Implications Of The Multibar Concept On Containers Advocates Organization (Peradi) Based On Decision Supreme Court No. 73/KMA/HK.01/IX/2015

Fauziah Lubis¹, Rizki Winanti², Putri Nurhazijah³, Rizka Putri Agustina S⁴, Salma Salsabila⁵, Salsabila Alamanda⁶

Universitas Islam Negeri Sumatera Utara, Indonesia

Article Info	ABSTRACT
<p>Keywords: Multibar Concept, Advocate Organization, Supreme Court Decision of the Republic of Indonesia</p>	<p>The purpose of this study is to determine the relationship between the issuance of Supreme Court Decision Number 73/KMA/HK.01/IX/2015 with the Multibar concept and to determine the negative impact of the Multibar concept if applied to the Advocate Organization in Indonesia. The problem in this study is because there has been a debate on the Supreme Court Decision Number 73/KMA/HK.01/IX/2015 which tends to favor the Multibar concept . This study uses the Normative Juridical method, namely analyzing problems through a legal principles approach that refers to legal norms contained in legislation. The results of the discussion, namely the issuance of the Supreme Court Decision Number 73/KMA/HK.01/IX/2015, show that if the decision is more in favor of the Multibar Concept, in this case it can certainly cause debate, chaos, violate higher laws, divide the Advocate Organization and can harm the Advocate profession.</p>
<p>This is an open access article under the CC BY-NC license</p> 	<p>Corresponding Author: Fauziah Lubis Universitas Islam Negeri Sumatera Utara, Indonesia fauziahlubis@uinsu.ac.id</p>

INTRODUCTION

Law Number 18 of 2003 concerning Advocates stipulates that the Advocates Organization is the only body that has the authority to regulate the advocate profession in Indonesia that is free and independent. This law was formed with the aim of improving the quality of the advocate profession. The formation of the Advocate Law was on April 5, 2003, since then, it has been mandated by the legislators to form a single advocate organization called PERADI (Indonesian Advocates Association) which was established on December 21, 2004 (Lubis, 2021).

However moment This has seen that currently There was a split within PERADI, which gave rise to a new idea that is draft *Multibar* (plural) . Concept *Multibar* offers an alternative in managing the advocate profession, but also presents challenges in enforcing professional standards and ethics in advocates . The polemic over the *Multibar* concept demands a renewal of the Advocate Law which is considered to favor the *Single Bar concept*. For those who are pro the *Multibar concept*, they consider that this concept is very relevant to be implemented in Indonesia because it is considered to provide freedom to advocates to choose a professional advocate organization according to their wishes.

The Supreme Court issued Decision Number 73/KMA/HK.01/IX/2015 on September 25, 2015 which annulled Decision Number 089/KMA/VI/2010 concerning the oath of Advocates and Decision Number 52/KMA/HK.01/III/2011 concerning the explanation of Decision Number 089/KMA/VI/2010. As is known in Decision Number 089/KMA/VI/2010, the Chief Justices of the High Court may take the oath of Prospective Advocates who have met the requirements with the provision that the oath must be submitted by the PERADI Management in accordance with the spirit of the agreement.

Since the enactment of the decision, it has brought about changes to the development of the Advocate Organization itself. With publication Decision Supreme Court Number 73/KMA/HK.01/IX/2015 becomes runway reference temporary before revised Law Number 18 of 2003 concerning Advocates . Decision This Supreme Court has caused pros and cons among advocates . Some support it on the grounds that it can provide freedom for advocates to choose an organization that suits their wishes, but on the other hand there are also those who are against the Multibar concept . because it is feared that there will be fragmentation in the Advocate profession. With this decision, the Advocate Organization which previously adopted the Single Bar concept has changed to open up opportunities to switch to adopting the Multibar concept .

According to the Chairman of the PERADI Central Honorary Council, the Multibar concept offered in the amendment to the Advocate Law and the formation of the National Advocate Council will only add to the problems of advocates and their organizations and harm the independence of the Advocate profession. According to him, the *Single Bar concept* with PERADI as the only Advocate Organization is considered more ideal to be applied to the Advocate Organization model in Indonesia. As regulated in Article 28 paragraph (1) of the Advocate Law, it states , "The Advocate Organization is the only free and independent advocate profession forum formed in accordance with the provisions of this law with the intent and purpose of improving the quality of the Advocate profession (Presiden Republik Indonesia, 2003). "

In recent years, the discourse on *the Multibar concept* has been very much discussed in Indonesia. This is due to the alleged *Single Bar* concept played by PERADI supported by MA-RI and also the existence of Law Number 18 of 2003 concerning Advocates, Article 28 paragraph (1) which further strengthens the *Single Bar concept* used in the Advocate Organization in Indonesia. Therefore, the *Multibar concept* emerged to shift the existence of the Single Bar concept , *which* was strengthened by the issuance of Supreme Court Decision Number 73/KMA /HK.01/IX/2015 , namely Regarding the Advocates' Oath , where the Supreme Court Decision is suspected of opening up opportunities to change the concept of the Advocates' Organization in Indonesia to *Multibar* .

Therefore, seeing the problems that are currently occurring, the author has undertaken this research to analyze the relationship between the Supreme Court Decision and the existence of the Supreme Court Decision. Number 73/KMA /HK.01/IX/2015 with the *Multibar concept* for the Advocate Organization in Indonesia, and to determine the impact that will occur if the *Multibar concept* is implemented in the Advocate Organization in Indonesia.

RESEARCH METHODS

The research method used in this study is Normative Juridical, which is an approach carried out by examining the approach of theories, concepts and reviewing relevant laws and legal principles. The author began this research analysis from the Supreme Court Decision Number 73/KMA /HK.01/IX/2015 , after analyzing the decision, the author then analyzes the impacts caused by the implementation of the *Multibar concept* since the issuance of the decision.

DISCUSSION RESULTS

Multibar Concept In Advocate Organizations In Indonesia

Multibar is a term that refers to the many advocate organizations in Indonesia. This concept aims to unite various organizations in one regulatory framework, proposed by the Indonesian Advocates Congress (KAI) (Fatahuddin, 2022). In addition, another goal is to create a single model of examination and education for advocates, so that the quality of advocates can be improved overall. The concept Multibar refers to the system which allows advocates to choose to become members of more than one professional advocate organization. This concept is different from the Single Bar concept which only recognizes one advocate organization as the sole authority. In other countries such as the United States and England has apply draft Multibar .

According to David Wilkins , the concept Multibar allows for healthy competition between organization that can improve the quality of legal services. However, on the other hand, Multibar also has the potential to create fragmentation in the ethical standards and professionalism of advocates (Wilkins, 2020). Supporters of the Multibar concept argue that this concept is more democratic and gives advocates the freedom to choose an organization that suits their vision and desires . However, it does not rule out the possibility of a decline in the quality of advocates and potential conflicts between organizations that can disrupt the justice system. The Advocates Organization in Indonesia continues to experience institutional problems that hinder efforts to achieve the mandate , especially in terms of ensuring the improvement of the quality of Advocates in Indonesia (Afandi, 2023).

Although the Multibar concept offers several advantages, not all parties agree with its implementation. The Indonesian Advocates Association (PERADI), as one of the leading advocate organizations, firmly rejects this idea. PERADI argues that the Single Bar model (one organization) is more effective in achieving standardization of education and supervision of advocates. This rejection is based on concerns that the Multibar concept will increase complexity and conflict between advocate organizers, and reduce the independence of the advocate profession. In the long term, the Multibar concept will have an impact on the quality, integrity, and function of advocates in the legal system in Indonesia.

The split within PERADI after the departure of a number of senior advocates and the formation of organizations such as the Indonesian Advocates Congress (KAI) has created a dilemma in law enforcement in Indonesia. The Supreme Court and the Constitutional Court have issued several decisions regarding the role of PERADI, but the issue of dualism or plurality the advocate organization has not been fully resolved (Mahkamah Konstitusi RI, 2008). From the perspective of the Indonesian constitution, both *the Single Bar* and *the*

Multibar must be assessed based on the basic principles stated in Article 28 E paragraph (3) of the 1945 Constitution, namely providing a guarantee of freedom of association which is the basis for the formation of professional organizations.

The formation of PERADI caused polemics among several members of the Advocates Organization who considered that the formation of PERADI was not transparent, did not give members the rights to freely elect their administrators, was unfair and not accountable (Sulastri, 2020). PERADI was seen as not fulfilling the requirements for the formation of a democratic national bar association. Until finally the dissatisfaction with the formation of PERADI gave rise to the Declaration of the Indonesian Advocates Congress (KAI). The conflict between the administrators of the Advocates Organization received a response from the Supreme Court by issuing Decision Number 052/KMA/V/2009 concerning the Supreme Court's attitude towards the Advocates Organization.

For those who agree or support the concept This multibar assumes that this concept will provide many associations, create healthy competition, encourage increased service and professionalism. Advocates have the freedom to join associations that are more in line with their values or professional interests. However, the concept of this multibar has its own challenges, one of which is the risk of fragmentation of professional standards. With more than one association, it is possible for there to be differences in codes of ethics and competency standards between the associations.

Relationship Between The Decision Of The Chief Court Of The Supreme Court Number 73/KMA/HK.01/IX/2015 With The Multibar Concept

The Supreme Court issued Decision Number 73/KMA/HK.01/IX/2015 that is about the Advocate's Oath . This decision is one of the legal bases that regulate the process of swearing in advocates in Indonesia (Mahkamah Agung RI, 2015). Broadly speaking, this decision was issued by the Supreme Court in response to the dynamics of the Advocate Organization in Indonesia and also the decision of the Constitutional Court regarding the advocate profession. Supreme Court Decision Number 73/KMA/HK.01/IX/2015 contains :

- a. The authority of the Chief Justice of the High Court, where this letter gives the authority to the Chief Justice of the High Court to swear in qualified advocates, even if they come from different advocate organizations.
- b. Requirements for the Oath, This letter also reaffirms the requirements that must be met by an advocate in order to be sworn in, such as having passed the advocate exam, having good moral integrity, and never having committed an act that is detrimental to the advocate profession.
- c. Purpose of the Oath: The oath of an advocate aims to provide official recognition of a person's status as an advocate and enable him/her to practice the profession of advocate legally.

The background of the Supreme Court issuing decision Number 73/KMA/HK.01/IX/2015 concerning the Advocates' Oath began with the many letters to the Supreme Court from various advocate administrators and individuals concerning the oath of advocates and related to the Constitutional Court Decision Number 101/PUUVII/2009 dated December 29, 2009 and the Supreme Court Decision Number 089/KMA/VI/2010 dated June

25, 2010 concerning the oath of advocates in conjunction with Number 052/KMA/HK.01/III/2011 dated March 23, 2011 concerning the explanation of the Supreme Court Decision Number 089/KMA/VI/2010, this was the consideration of the Supreme Court to then act to issue a decision concerning the Advocate Organization that could file an advocate oath at the High Court. (Asyura, 2019)

It was recorded that there were nine applications for judicial review of Law Number 18 of 2003 concerning Advocates at the Constitutional Court, the main points of the application being tested at the Constitutional Court were as follows (Atsar, 2018):

1. Application Number 019/PUU-I/2003
This application argues that the explanation of Article 2 Paragraph (1) of Law Number 18 of 2003 concerning Advocates is in conflict with Article 24 of the 1945 Constitution of the Republic of Indonesia. Based on the Court's considerations, the application was declared groundless and rejected.
2. Application Number 006/PUU-II/2004
This application alleges Article 31 of Law Number 18 of 2003 concerning Advocates against Article 28F of the 1945 Constitution of the Republic of Indonesia. Based on the Court's considerations, the application was granted by stating that Article 31 of Law Number 18 of 2003 concerning Advocates is in conflict with the 1945 Constitution and stating that it does not have binding legal force.
3. Application Number 014/PUU-IV/2006
This application tests Article 1 Paragraph (1) and Paragraph (4), Article 28 Paragraph (1) and Paragraph (3) and Article 32 paragraph (4) of Law Number 18 of 2003 concerning Advocates. Based on the Court's considerations, the application is rejected in its entirety.
4. Application Number 009/PUU-IV/2009
This application tests Article 32 Paragraph (1) of Law Number 18 of 2003 concerning Advocates. Based on the Court's considerations, the applicants do not have legal standing, so the application is declared inadmissible.
5. Application Number 015/PUU-IV/2009
This application tests Article 32 Paragraph (3) of Law Number 18 of 2003 concerning Advocates. Based on the Court's considerations, the application does not have *legal standing* so the application is declared inadmissible (*niet ontvankelijk verklaard*).
6. Application Number 101/PUU/VII/2009
In this application, the constitutional review in the provisions of Article 4 Paragraph (1) of Law Number 18 of 2003 concerning Advocates was tested. Based on the Court's considerations, the application was partially granted.
7. Application Number 66/PUU-VIII/2010
In this application, it is related to *the Judicial Review* of Article 28 Paragraph (1), Article 30 Paragraph (2), Article 32 Paragraph (4) of Law Number 18 of 2003 concerning Advocates. The Constitutional Court's consideration is that some are declared *ne bis in idem*, while others are declared not proven.
8. Application Number 71/PUU-VIII/2010

In this application, what was tested was Law Number 18 of 2003 concerning Advocates, Article 28 Paragraph (1) *in conjunction with* Article 32 Paragraph (3) and Paragraph (4). Based on the Court's considerations, the application violated the principle of *ne bis in idem* and the application was rejected (not acceptable).

9. Application Number 79/PUU-VIII/2010

This is an application containing the judicial review of Law Number 18 of 2003 concerning Advocates Article 28 Paragraph (1) against the 1945 Constitution of the Republic of Indonesia by eight advocates who have not been sworn in. The Constitutional Court's decision rejected the application.

Supreme Court Decision Number 73/KMA/HK.01/IX/2015 is related to the concept of "*Multibar*" because it is the basis for changing the organizational structure of advocates from the *Single Bar system* to the *Multibar system*. Previously, the Advocate organization in Indonesia, based on Article 28 paragraph (1) of Law Number 18 of 2003 on Advocates, was required to be in the form of a *Single Bar*, represented by the Indonesian Advocates Association (PERADI) (Imam Ghozali, 2020). Changes to the rules through a Decision Supreme Court of the Republic of Indonesia Number 73/KMA/HK.01/IX/2015 creates an advocate body from the legal system *Single Bar* become *Multibar*. This causes major problems such as the difficulty of controlling advocates and advocate organizations, declining quality and integrity of advocates, and harming the justice-seeking community.

However, the Supreme Court Decision Number 73/KMA/HK.01/IX/2015 instructed the High Court to take the oath of prospective advocates from various organizations, not only from PERADI, until the formation of the new Advocate Law. This is based on the Constitutional Court Decision Number 101/PUU-VII/2009 which states that taking the oath of an advocate does not have to be associated with membership of a particular organization (Mahkamah Kosntitusi RI, 2009). Thus, this letter provides *de facto recognition* of the existence of many Advocate Organizations, such as KAI, IKADIN, and others. The main reason for issuing this policy is because the existing Advocate Organizations, especially PERADI, have split.

This transformation creates a *Multibar model* where various advocate organizations can operate *independently*, including in the process of education, certification, professional exams, and submission of advocate oaths. This *Multibar concept* allows for freer and healthier competition between advocate organizations, but also raises challenges in terms of monitoring the code of ethics and quality of advocates. From the perspective of those who support the *Multibar Concept*, it explains that with the *Multibar concept*, each advocate organization is required to meet certain standards in terms of education and certification of prospective advocates. This certainly creates healthy competition between organizations and is expected to improve the quality of legal services in Indonesia.

However, there is still much debate regarding the effectiveness of the *Multibar model* compared to the *Single Bar model* proposed by PERADI, which argues that the *Singlebar model* is easier in terms of standardization and supervision. With the issuance of the Supreme Court Decision of the Republic of Indonesia Number 73/KMA/HK.01/IX/2015 concerning the oath of advocates, this has caused chaos, violated higher regulations, divided advocate

organizations, and harmed the advocate profession, especially the community seeking justice. The role of advocates should be strengthened and protected. Lower regulations, such as Supreme Court Decision Number 73/KMA/HK.01/IX/2015 concerning the oath of advocates, must not violate higher regulations, especially Law Number 18 of 2003 concerning Advocates. This is in accordance with the principle of *Lex Superior derogatory legion inferiori* , which means that higher rules override lower rules.

In the Constitutional Court Decree Number 014/PUU-IV/2006, Number 103/PUU-XI/2013, Number 112/PUUXII/2014, and Number 36/PUU-XIII/2015. Previous Constitutional Court Decisions, such as Number 014/PUU-IV/2006, Number 103/PUUXI/2013, Number 112/PUU-XII/2014, and Number 36/PUU-XIII/2015, emphasized that PERADI is the only organization that has the authority to appoint and swear in advocates (Mahkamah Konstitusi RI, 2014). On the other hand, Constitutional Court Decision Number 101/PUU-VII/2009 stated that other advocate organizations, besides PERADI, can also appoint and swear in advocates (Manganju, 2023). This decision became a reference for the issuance of Supreme Court Decision Number 73/KMA/HK.01/IX/2015 on September 25, 2015 under the leadership of Prof. Dr. M. Hatta. Ali, SH, MH .

Dispute over the status of the concept *Single Bar* or *Multibar* which has decided by the Constitutional Court, the latest of which was decided in the Decision No. 35 /PUU-XVII/2018 on November 28, 2019. However, the decision does not explicitly state that PERADI is the only advocate organization because there is an important point in the decision which states that specifically the authority for swearing in or appointing advocates, in In the future, advocate organizations other than PERADI must immediately adjust to the PERADI organization as the only professional organization for advocates that has eight authorities, including the authority to appoint advocates (Tsani, 2021).

Decision Number 73/KMA/HK.01/IX/2015 concerning the Oath of Advocates is suspected of having changed Advocate education into a business and damaged the standards for the appointment and oath of Advocates that have been stipulated in Law Number 18 of 2003 concerning Advocates. Although the Law has not been amended, the Supreme Court Decision makes it seem as if there has been a change . Legally, the appointment and oath of Advocates are regulated by Law Number 18 of 2003 concerning Advocates, but in practice, the Supreme Court Decision Number 73/KMA/ HK.01/ IX/2015 becomes a stronger regulation. In this case, it shows that the Supreme Court Decision is considered more valid than the Law made by the Legislature and Executive. Of course, this is a violation of the State constitution which is very worrying.

The Influence Of The Multibar Concept On The Organizational Containers Of Advocates In Indonesia

Some parties want Advocates to be accommodated by more than just organizations . that is with draft *Multibar* , However a number of party still hold on firm that the concept adopted by the Organization Advocates in Indonesia are *Single Bar* in accordance with mandate Law Number 18 of 2003 concerning Advocates Article 28 paragraph (1). However, apart from the dispute, it should be noted that the *Multibar concept* has negative impacts that

accompany the sustainability of the Advocate Organization in Indonesia. The impacts that can arise from the *Multibar concept* are as follows:

a. Triggering Divisions Between Advocates' Organizations

The large number of advocate organizations is considered to worsen the image of advocates. In fact, advocates are a noble profession that must have high standards. Currently, many parties are establishing advocate organizations and it is feared that these Advocate Organizations will become organizations that can each issue advocate licenses, issue permits to practice advocacy. The current *Multibar concept* has created competition from advocate organizations to recruit prospective advocates, one of which is by competing to find PKPA participants. There are many advocate organizations competing to attract clients and members. This competition can lead to lower standards of training and education for prospective advocates because each organization tries to offer easier and more practical programs to prospective advocate members.

b. Risk of Fragmentation and Legal Uncertainty

The potential fragmentation in ethical standardization and regulation is one of the negative impacts of the *Multibar model concept*. Each organization can set certain ethical standards, which can make the public and advocates unsure of the law and reduce public trust in the legal profession.

c. Relaxing the Requirements for the Advocate Profession

With many parties establishing advocate organizations, it is possible that the requirements for the Advocate Profession will be further relaxed. This is certainly very worrying for the quality of prospective advocates which will continue to decline due to the relaxation of the advocate requirements. The requirements to become an advocate have been stipulated in Law Number 18 of 2003 concerning Advocates. With the many advocate organizations that have been established, there is fierce competition, and one way to win the competition is to relax the requirements in order to attract prospective advocates to join the advocate organization.

d. Advocates Can Move Organizations Easily

The existence of advocate organizations that are divided into several parts can make it easy for advocates to move advocate organizations without giving strict sanctions. For example, one advocate is expelled from one advocate organization for violating the code of ethics and he can still look for another advocate organization to join there.

e. No Quality and Ethical Standards

With the existence of many advocate organizations, it will certainly affect the quality standards of the advocates themselves. And it is even possible that there will be more advocates who violate the code of ethics but can still be sheltered in an Advocate Organization. Because currently the reality shows that there are already many advocates who violate the advocate code of ethics, they forget the purpose of becoming an advocate for the sake of existence and personal gain which often violates the advocate code of ethics. In fact, we can see that currently there are still many advocates who have clearly violated the code of ethics but have not been fired from the advocate organization

where they are sheltered, this will certainly cause a negative stigma in the public's view that the advocate profession is unprofessional and leaves a bad impression in the eyes of the general public. In fact, what is wrong is the individual's behavior, not the advocate profession.

The explanation above is some of the negative impacts that arise if the Advocate Organization applies the *Multibar concept*. Although some argue that this concept has a positive impact, such as that a person has the freedom to choose which advocate organization he will choose. However, the freedom to choose cannot necessarily be said to have a positive impact, in fact the freedom to choose this advocate organization can also make a person free to act without obeying existing regulations. Each concept between *Single bar* and *Multibar* certainly has positive and negative sides, but the author has a different opinion and according to the author the concept *Multibar* in this Advocate Organization is more dominant in bringing negative impacts. Of course, in reviewing the concept of *Multibar*, it must be reviewed again in terms of its benefits.

CONCLUSION

Supreme Court Decision Number 73/KMA/HK.01/IX/2015 has a close relationship with the concept of "*Multibar*" because it is the basis for changing the organizational structure of advocates from the *Single Bar concept* to the *Multibar concept*. With the issuance of this Supreme Court Decision, it is more in favor of the *Multibar concept* and opens up opportunities for this concept to be applied to *advocate organization* in Indonesia. The issuance of Decision Supreme Court of the Republic of Indonesia Number 73/KMA/HK.01/IX/2015 concerning the oath of advocates, causes causing chaos, violating higher regulations, dividing advocate organizations, and harming the advocate profession, especially the community that is currently seeking justice. The Exit Decision Court This is great while wait existence revision Law Number 18 of 2003 concerning Advocates. In fact, it is not the Law that is wrong so that it must be revised, but its implementation must be further emphasized on each individual. This Law on Advocates does need to be revised immediately because the Law has been categorized as old since 2003 and has never been revised until now. The *Multibar concept* has a more dominant negative impact, namely: Triggering Divisions Between Advocate Organizations, Risk of Fragmentation and Legal Uncertainty, Relaxing the Requirements for the Advocate Profession, Advocates Can Change Organizations Easily and There Are No Quality and Ethical Standards.

REFERENCE

- Afandi, F. (2023). *Menerapkan Standarisasi, Memperkuat Akuntabilitas dan Nilai-Nilai Ideal Profesi Advokat : Studi Kelembagaan Orgaisasi Advokat Di Indonesia*. Jakarta: Institute For Criminal Justice Reform .
- Asyura, M. (2019). Kewenangan Ketua Mahkamah Agung Mengeluarkan Surat Keputusan Ketua Mahkamah Agung Nomor 73/KMA/HK.01/IX/2015 Perihal Penyempahan Advokat. *Law Jurnal*, 442.
- Atsar, A. (2018). *Profesi Advokat Dan Tantangan Masa Depan*. Tasikmalaya: Rumah

Cemerlang.

- Fatahuddin. (2022, Juni Rabu). *PARE POS co.id*. Retrieved Desember Senin, 2024, from parepos.fajar.co.id: <https://parepos.fajar.co.id/2022/06/kai-tawarkan-konsep-multi-bar-sebagai-penyelesaian-masalah-advokat/amp/>
- Imam Ghozali, M. (2020). Transformasi Organisasi Advokat Indonesia dari Single Bar Menjadi MultiBar (Implikasi Putusan Mahkamah Konstitusi No. 101/PPU-VII/2009 dan Surat Ketua Mahkamah Agung No. 73/KMA/HK.01/IX/2015). *Mizan : Jurnal Ilmu Hukum*, 72-82.
- Lubis, F. (2021). *Bunga Rampai Hukum Keadvokatan*. Medan: FEBI PRESS.
- Mahkamah Konstitusi RI. (2008). *Putusan Nomor 22/PUU-VI/2008*. Jakarta: Sekretariat Negara.
- Mahkamah Konstitusi RI. (2014). *Putusan Nomor 112/PUU-XII/2014*. Jakarta: Sekretariat Negara.
- Mahkamah Kosntitusi RI. (2009). *Putusan Nomor 101/PUU-VII/2009*. Jakarta: Sekretariat Negara.
- Manganju. (2023). Menelusuri Kendala Hukum Dalam Surat Ketua Mahkamah Agung Republik Indonesia Nomor 73/KMA/HK.01/IX/2015 Tentang Pengambilan Sumpah Advokat Terhadap Organisasi Advokat Sebagai Satu-Satunya Wadah Menurut UU No. 18 Tahun 2003 Tentang Advokat. *Jurnal Cahaya*, 1126.
- Presiden Republik Indonesia. (2003). *Undang Undang Nomor 18 Tahun 2003 Tentang Advokat*. Jakarta: Sekretariat Negara .
- Sulastri, L. (2020). *Merajut Sistem Keorganisasian Advokat Di Indonesia*. Purwokerto: CV Gracias Logis Kreatif.
- Tsani, M. U. (2021). Tumpang Tindih Regulasi Advokat Di Indonesia. *Jurnal Hukum*, 159.
- Undang Undang Republik Indonesia . (2003). *Nomor 18 Tahun 2003 Tentang Advokat*. Jakarta: Sekretariat Negara.
- Wilkins, D. (2020). *The Future of the Legal Profession: Challenges and Opportunities*. Amerika Serikat: Harvard Law Review.