



AMRP LAW FIRM

Advocate & Legal Consultant

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Jalan Pemamoran No. 1 Sanur, Denpasar, Bali. 80228.



DUE DILIGENCE REPORT OF LAND

Proposed lease of 2 Plots of Land with Freehold Certificate (SHM) Number 9077/Tibubeneng Village, and Freehold Certificate (SHM) Number 7668/Tibubeneng Village.

These 2 land objects are located at Tibubeneng Village, North Kuta District, Badung Regency, Province Bali.

29th of December 2022



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1. INTRODUCTION

AMRP LAW FIRM (hereinafter referred to as "We or "Us") engaged with **Mr. VLADYSLAV STETSIUK** (hereinafter referred to as "**Client**") who intends to lease 2 plots of land mentioned below, to review, inquire, analysisist legal aspects of the land in relation with lease of under **Mr. I WAYAN TURUN** (The Landowner) and to provide the Client with a written report of the result (Report).

As per the Client's request we hereby provide the Due Diligence Report in the context of Land.

2. DUE DILIGENCE METHODOLOGY

In the making and preparation of this report, we reviewed the proposed lease of land primarily based on the documents provided by the Client, the landowner, and documents we obtained independently from the relevant and competent government agencies.

Only where indicated we have incorporated information, clarification, data, provided by the client, the landowner and the relevant and competent government agencies.

This Due Diligence Report include site visit or survey services.

3. QUALIFICATION, ASSUMPTION & WAIVER

This written Report is subject to the following Qualification, Assumption & Waiver:

1. We are qualified, licensed Indonesian advocates. Therefore, only able and permitted to advise within Indonesian Legal System under Indonesian Law(s);
2. This Report has been made based on the Law and Regulation of The Republic of Indonesia and the prevailing practices on the relevant jurisdiction;
3. This Due Diligence Report is not to be used, circulated, quoted, or referred to for any other purposes, is strictly limited to the matters stated herein, and is not to be read as extending by implication or otherwise to any other matter not specifically referred to herein.
4. This Due Diligence Report is made based on all of the information and documents supplied to us which are considered to be valid and correct. This Due Diligence Report



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has no binding legal force and cannot be used as evidence in a court. If there are new information, document provided and or regulations changes after the completion of this due diligence report then the content of this report may be a subject of change.

4. LIST OF COLLECTED DOCUMENTS :

1. Copy of Freehold Certificate (SHM) Number 9077/Tibubeneng Village on behalf of **I WAYAN TURUN;**
2. Copy of Freehold Certificate (SHM) Number 7668/Tibubeneng Village on behalf of **I WAYAN TURUN;**
3. Copy ID Card (KTP) of **I WAYAN YASA;**
4. Copy ID Card (KTP) of **I NYOMAN PUJAWAN;**
5. Copy ID Card (KTP) of **I KETUT PUJI ARSANA;**
6. Copy of death certificate of **I WAYAN TURUN;**
7. Copy of Declaration of Inheritance dated 16-11-2022 on behalf of **I WAYAN YASA, I NYOMAN PUJAWAN, I KETUT PUJI ARSANA;**
8. Copy of Family Tree Statement dated 16-11- 2022 on behalf of **I WAYAN YASA, I NYOMAN PUJAWAN, I KETUT PUJI ARSANA;**
9. Copy of Land and Building Tax (PBB) Print out 2022 on Freehold Land Certificate (SHM) Number 9077/Tibubeneng Village;
10. Copy of Land and Building Tax (PBB) Print out 2022 on Freehold Land Certificate (SHM) Number 7668/Tibubeneng Village;
11. Spatial Information (ITR) of Badung Regency 2021 - 2041 on Freehold Certificate (SHM) Number 9077/Tibubeneng Village, and Freehold Certificate (SHM) Number 7668/Tibubeneng Village;



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12. Official Land Certificate Validation Result from National Land Agency (BPN) of Badung Regency on Freehold Land Certificate (SHM) Number 9077/Tibubeneng Village;
13. Official Land Certificate Validation Result from National Land Agency (BPN) of Badung Regency on Freehold Land Certificate (SHM) Number 7668/Tibubeneng Village;

5. SUMMARY OF FINDINGS AND POTENTIAL ISSUES

FINDING/ IMPORTANT CONCERN	POTENTIAL ISSUE / OPINION
<u>Land Title and Ownership</u> In the Due Diligence, it is known that the right holders on Certificates are: - Freehold Certificate (SHM) Number 9077/Tibubeneng Village on behalf of I WAYAN TURUN; - Freehold Certificate (SHM) Number 7668/Tibubeneng Village on behalf of I WAYAN TURUN; - Hereinafter referred to as "Land Objects"	In Due Diligence it is known that: - These Land Objects are located at Karang Suwung Street, Tibubeneng Village, North Kuta District, Badung Regency, Province Bali. - The holder of the rights to Land Objects, namely I WAYAN TURUN, has <u>passed away</u> based on the Death Certificate Number 5103-KM-12072022-0002 dated July 12th, 2022 therefore those who are entitled to inherit are the heirs of I WAYAN TURUN, namely I WAYAN YASA, I NYOMAN PUJAWAN, and I KETUT PUJI ARSANA based on the Declaration of Inheritance Number 864/XI/22 Dated November, 16th 2022 which is known by the Kelian Banjar of the Pekambingan, Perbekel Tibubeneng, and the Head of the North Kuta District and based on the Family Tree Statement Number 609/XI/22 dated



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FINDING/ IMPORTANT CONCERN	POTENTIAL ISSUE / OPINION
	November, 16th 2022 which is known by the Kelian Banjar of the Pekambangan, Perbekel Tibubeneng, and North Kuta District Head; - Based on the findings above, the Client's Plan to conduct Lease transaction on Land Objects which are still in the name of I WAYAN TURUN can still be carried out provided that all inheritors accept and agrees with the Lease Transaction.
1. Land Certificate Validation Status on Freehold Land Certificate (SHM) Number 9077/Tibubeneng Village: - We applied Official Land Certificate Validation Check on 27th of December 2022 and receive the Validation Result namely <i>Hasil Pengecekan Resmi Sertipikat</i> (Official Land Certificate Validation Result) on 28th of December 2022.	1. Result: Based on the Official Land Certificate Validation Result No. 54245/2022 dated on 27th of December 2022, it is found that: a. This certificate is not being pledged as collateral; b. This certificate is free from legal blockade; c. This certificate is free from ministry initiative block; d. This certificate is free from confiscation; e. This certificate is free from dispute history.
2. Land Certificate Validation Status on Freehold Land Certificate (SHM) Number 7668/Tibubeneng Village: - We applied Official Land Certificate Validation Check on 24th of December 2022	2. Result: Based on the Official Land Certificate Validation Result No. 53659/2022 dated on 24th of December 2022, it is found that:



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FINDING/ IMPORTANT CONCERN	POTENTIAL ISSUE / OPINION
and receive the Validation Result namely <i>Hasil Pengecekan Resmi Sertipikat</i> (Official Land Certificate Validation Result) on 26 th of December 2022.	a. This certificate is not being pledged as collateral; b. This certificate is free from legal blockade; c. This certificate is free from ministry initiative block; d. This certificate is free from confiscation; e. This certificate is free from dispute history.
1. <u>Taxation on Freehold Certificate (SHM)</u> <u>Number 9077/Tibubeneng Village:</u> 1) The Land Tax Object Number: 51.03.060.006.029-0561.0 registered under the name of I WAYAN TURUN; 2) Latest land and building tax due per 2022 is in the amount IDR. 0,- (Zero rupiah) or Paid Off. 2. <u>Taxation on Freehold Certificate (SHM)</u> <u>Number 7668/Tibubeneng Village:</u> 1) The Land Tax Object Number: 51.03.060.006.029-0193.0 registered under the name of I WAYAN TURUN; 2) Latest land and building tax due per 2022 is in the amount IDR. 6.935,- (six thousand nine hundred and thirty five rupiah)	1. <u>Taxation on Status:</u> 1) For your information. 2) For your information. 2. <u>Taxation on Status:</u> 1) For your information. 2) For your information.



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FINDING/ IMPORTANT CONCERN	POTENTIAL ISSUE / OPINION
Zoning: on Freehold Land Certificate (SHM) Number 9077/Tibubeneng Village and Freehold Land Certificate (SHM) Number 7668/Tibubeneng Village: - These 2 plots of land are located in the MIXED ZONE OF HOUSING AND TRADE/SERVICES (ZONA CAMPURAN PERUMAHAN DAN PERDAGANGAN/JASA) (C-1), based on Badung Regent Regulation Number 9 of 2021 Concerning Detailed Spatial Plans for North Kuta District 2021 - 2041.	- For your information, this Mixed Zone of Housing and Trade/Services, hereinafter referred to as Subzone C-1, is a spatial allotment which is part of a cultivation area developed to accommodate several mixed and integrated functional designations between housing and trade and services, especially tourism services. <u>This zoning allows application of Certificate of Functionality (SLF) or Building Permit (PBG).</u>

6. REPORT OF STATUS AND DETAILS

A. Land Object

1. We have visited the Land Objects location on December, 5th 2022 with the following results:
 - a) These Land Objects on Freehold Certificate (SHM) Number 9077/Tibubeneng Village and Freehold Certificate (SHM) Number 7668/Tibubeneng Village located at Karang Suwung Street, Banjar Dinas Tandeg, Tibubeneng Village, North Kuta District, Badung Regency, Bali Province.
 - b) Land Coordinates (Google Map) on:
 - Freehold Certificate (SHM) Number 9077/Tibubeneng Village -8.652639, 115.146000, Link: https://maps.app.goo.gl/nGMCT3LLv59ebUBu9?g_st=iw
 - Freehold Certificate (SHM) Number 7668/Tibubeneng Village -8.652944, 115.146667, Link: <https://goo.gl/maps/7zMKJpyp4MqnUGuM7>



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Global Location Estimation 2 plot of Land Objects from Google Map

c) Boundaries of land object on:

- Freehold Certificate (SHM) Number 9077/Tibubeneng Village
 - North : Freehold
 - South : Freehold
 - West : Freehold
 - East : Freehold Certificate (SHM) Number 7668
- Freehold Certificate (SHM) Number 7668/Tibubeneng Village
 - North : Freehold



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- South : Freehold
- West : Freehold Certificate (SHM) Number 9077
- East : Karang Suwung Street

d) Condition of the object:

- Condition The current land objects that the Client plans to lease with a total area of 2,250 m², is a vacant land overgrown with grass.



Condition of 2 leased object



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e) Road Access

- We can inform you about the condition of the road access to the location of the Land Objects, which is a **public road** that has been paved with the name Karang Suwung Street with a width of approximately 7 meters.

B. Land Certificate Validation Status in Office of the National Land Agency of Badung Regency for :

1. Freehold Certificate (SHM) Number 9077/Tibubeneng Village

We applied Official Land Certificate Validation Check on 27th of December 2022 and receive the Validation Result namely *Hasil Pengecekan Resmi Sertifikat* (Official Land Certificate Validation Result) on 28th of December 2022, with following result :



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**KEMENTERIAN AGRARIA DAN TATA RUANG/
BADAN PERTANAHAN NASIONAL**

KANTOR PERTANAHAN KABUPATEN BADUNG
Alamat: JLN. DEWI SARASWATI NO. 3 KEL. SEMINYAK KECAMATAN KUTA MANGUPURA

PENGECEKAN SERTIPIKAT

No Berkas : 54245 / 2022

NTPN : 820221227101039 27/12/2022 10:58:46

Sertipikat

- Jenis Hak : Hak Milik
- No Hak : 09077
- Desa TIBUBENENG
- No Seri : AK719976
- NIB : 22030806.09992
- No SU.09776/2022
- No SK :
- Luas : 2100 m2
- Tanggal Penerbitan : 07/05/1998
- Tanggal Berakhir Hak :
- Asal Hak : Ganti Desa

Nama Pemilik

- I WAYAN TURUN, BADUNG, 31 DESEMBER 1936

Penunjuk

- BUKU TANAH HM NO. 1190 DESA CANGGU
PINDAH DESA DARI M.3544 CANGGU

Catatan Pendaftaran Terakhir

.

Daftar Hak Tanggungan

- Sertipikat ini tidak sedang diagunkan

Blokir

- Sertipikat ini tidak terdapat blokir
- Sertipikat ini tidak terdapat blokir inisiatif kementerian

Sita

- Sertipikat ini tidak terdapat sita

Informasi Kasus

- Sertipikat ini tidak terdapat sengketa / konflik / perkara

* Hasil Pengecekan ini diterbitkan tanggal 28 Desember 2022 pukul 14:38:02

* Apabila dalam waktu 7 (tujuh) hari kalender terdapat perubahan data maka akan diinformasikan kepada Pemohon.

* Pastikan kesesuaian fisik pemegang hak atas tanah ini dengan bentuk dan letaknya melalui aplikasi 'Sentuh Tanahku' atau <https://bhumit.atrbpn.go.id>

* Apabila terdapat ketidaksesuaian hasil pengecekan dengan Sertipikat Hak atas Tanah maka pemohon melakukan klarifikasi atau menghubungi Kantor Pertanahan setempat dengan membawa bukti pendaftaran permohonan.



Ditandatangani secara elektronik oleh:

Beny Mariani, S. H.
NIP. 196003282001122003

Perhatian :

- Asli dokumen ini berbentuk Dokumen Elektronik yang ditandatangani dengan Tanda Tangan Elektronik yang telah disertifikasi oleh BSE.
- Dilarang melakukan penyebaran surat atau penggantian kepada pihak lain yang tidak terkait.
- Dilarang melakukan pemalsuan surat atau manipulasi informasi elektronik dan/atau dokumen elektronik dapat dikenakan Pasal 263 KUHPidana dengan ancaman pidana paling lama 6 (enam) tahun penjara dan/atau Pasal 35 dan Pasal 51 (1) UU ITE dengan ancaman hukuman paling lama 12 (dua belas) tahun penjara dan denda paling banyak Rp.12 Miliar.



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Informasi peta bidang tanah :



Keterangan : Rencana Detil Tata Ruang/Rencana Tata Ruang Wilayah belum terintegrasi

Pemhatian :

- Asli dokumen ini berbentuk Dokumen Elektronik yang disandatangani dengan Tanda Tangan Elektronik yang telah disertifikasi oleh BSE.
- Dilarang melakukan penyebaran dan/atau penggantian kepada pihak lain yang tidak terkait.
- Dilarang melakukan pemalsuan surat atau manipulasi informasi elektronik dan/atau dokumen elektronik dapat dikenakan Pasal 283 KUHPidana dengan ancaman pidana paling lama 6 (enam) tahun penjara dan/atau Pasal 35 dan Pasal 51 (1) UU ITE dengan ancaman hukuman paling lama 12 (dua belas) tahun penjara dan denda paling banyak Rp.12 Miliar.



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The Official Land Certificate Validation Results Freehold Certificate Number 9077/Tibubeneng Village



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2. Freehold Certificate (SHM) Number 7668/Tibubeneng Village

We applied Official Land Certificate Validation Check on 24th of December 2022 and receive the Validation Result namely *Hasil Pengecekan Resmi Sertifikat* (Official Land Certificate Validation Result) on 26th of December 2022, with following result :

 **KEMENTERIAN AGRARIA DAN TATA RUANG/
BADAN PERTANAHAN NASIONAL**
KANTOR PERTANAHAN KABUPATEN BADUNG
Alamat: JLN. DEWI SARASWATI NO. 3 KEL. SEMINYAK KECAMATAN KUTA MANGUPURA

PENGECEKAN SERTIPIKAT

No Berkas : 53659 / 2022
NTPN : 820221224871572 24/12/2022 09:49:17

Sertipikat • Jenis Hak : Hak Milik • No Hak : 07668 • Desa TIBUBENENG • No Seri : AAG617773 • NIB : 22030806.08257 • No SU.08082/2018 • No SK : • Luas : 150 m2 • Tanggal Penerbitan : 23/08/2018 • Tanggal Berakhir Hak : • Asal Hak : Pengakuan Hak Nama Pemilik • I WAYAN TURUN, BADUNG, 31 DESEMBER 1936 Penunjuk • Berasal dari Surat Pernyataan Penguasaan Fisik nomor 1 dengan nomor persil 8257 Catatan Pendaftaran Terakhir •	Daftar Hak Tanggungan • Sertipikat ini tidak sedang diagunkan Blokir • Sertipikat ini tidak terdapat blokir • Sertipikat ini tidak terdapat blokir inisiatif kementerian Sita • Sertipikat ini tidak terdapat sita Informasi Kasus • Sertipikat ini tidak terdapat sengketa / konflik / perkara
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* Hasil Pengecekan ini diterbitkan tanggal 26 Desember 2022 pukul 16:42:59
* Apabila dalam waktu 7 (tujuh) hari kalender terdapat perubahan data maka akan diinformasikan kepada Pemohon.
* Pastikan kesesuaian penguasaan fisik pemegang hak atas tanah ini dengan bentuk dan letaknya melalui aplikasi 'Sentuh Tanahku' atau <https://bhumi.atrptn.go.id>
* Apabila terdapat ketidaksesuaian hasil pengecekan dengan Sertipikat Hak atas Tanah maka pemohon melakukan klarifikasi atau menghubungi Kantor Pertanahan setempat dengan membawa bukti pendaftaran pemohonan.



Ditandatangani secara elektronik oleh:

Reny Mariasari, S.H
NIP. 196603282001122003

Perhatian :

- Asli dokumen ini berbentuk Dokumen Elektronik yang ditandatangani dengan Tanda Tangan Elektronik yang telah disertifikasi oleh B2/E.
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- Dilarang melakukan pemalsuan surat atau manipulasi informasi elektronik dan/atau dokumen elektronik dapat dikenakan Pasal 263 KUHP Pidana dengan ancaman pidana paling lama 6 (enam) tahun penjara dan/atau Pasal 35 dan Pasal 51 (1) UU ITE dengan ancaman hukuman paling lama 12 (dua belas) tahun penjara dan denda paling banyak Rp.12 Miliar.





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Keterangan : Rencana Detil Tata Ruang/Rencana Tata Ruang Wilayah belum terintegrasi

Perhatian :

- Asli dokumen ini berbentuk Dokumen Elektronik yang diandatangani dengan Tanda Tangan Elektronik yang telah disertifikasi oleh SS-E.
- Dilarang melakukan penyebaran dan/atau pengendalian kepada pihak lain yang tidak terkait.
- Dilarang melakukan pemalsuan surat atau manipulasi informasi elektronik dan/atau dokumen elektronik dapat dikenakan Pasal 263 KUHP Pidana dengan ancaman pidana paling lama 5 (lima) tahun penjara dan/atau Pasal 35 dan Pasal 51 (1) UU ITE dengan ancaman hukuman paling lama 12 (dua belas) tahun penjara dan denda paling banyak Rp.12 Miliar.



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The Official Land Certificate Validation Results Freehold Certificate Number 7688/Tibubeneng Village



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C. Land and Building Tax Status

1. The Land Freehold Certificate (SHM) Number 9077/Tibubeneng Village

We have checked the Land Tax Status where from the results of the check it is known that the Land Tax on a land object of 2,100 m² in the name of **I WAYAN TURUN** with the following details:

- a. Land area : 2,100 m²
 - NJOP of Land (Average Tax Object Value) per m² : IDR 2.779.000,- (two million seven hundred seventy nine thousand rupiah);
 - Total NJOP of Land : IDR 5.835.900.000,- (five billion eight hundred thirty five million nine hundred thousand rupiah).
- b. Tax Object Number: 51.03.060.006.029-0561.0
- c. Registered in the name: **I WAYAN TURUN**
- d. Total Tax Payable is IDR 0,- (Zero rupiah) or Paid Off

Halaman 2

KARTU DATA
Sampai dengan tanggal : 05 Desember 2022

NOP	: 51.03.060.006.029-0561.0	Alamat WP	: JL PANTAI BERAWA NO 4
Nama WP	: I WAYAN TURUN	Alamat OP	: SB SEMAT
Luas Bumi	: 2.100,00	Luas Bangunan	: 0,00
NJOP/M2 Bumi	: 2.779.000	NJOP/M2 Bangunan	: 0
NJOP Bumi	: 5.835.900.000	NJOP Bangunan	: 0

Tanggal	No. Bukti	Uraian	SPPT (Rp.)	Setoran (Rp.)	Sisa (Rp.)	Denda (Rp.)	Setoran (Rp.)	Sisa Denda (Rp.)
22/05/2020		SPPT Tahun 2020 (Jatuh Tempo Tanggal 2020-11-30)	189.420		189.420			0
31/08/2020	510306000602905610	Setoran Tahun 2020		189.420	0	0	0	0
16/03/2021		SPPT Tahun 2021 (Jatuh Tempo Tanggal 2021-09-30)	189.420		189.420			0
10/07/2021	510306000602905610	Setoran Tahun 2021		189.420	0	0	0	0
02/02/2022		SPPT Tahun 2022 (Jatuh Tempo Tanggal 2022-09-30)	189.420		189.420			0
25/08/2022	-	Setoran Tahun 2022		189.420	0	0	0	0
Total :			1.308.720	1.308.720	0	34.096	34.096	0

Generated at : 05/12/2022 10:25:39 +0800

Land Tax Print out from Dinas Pendapatan Daerah Kabupaten Badung



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2. The Land Freehold Certificate (SHM) Number 7688/Tibubeneng Village

We have checked the Land Tax Status where from the results of the check it is known that the Land Tax on a land object of 150 m² in the name of **I WAYAN TURUN** with the following details:

a. Land area : 150 m²

- NJOP of Land (Average Tax Object Value) per m² : IDR 2.779.000,- (two million seven hundred seventy nine thousand rupiah);
- Total NJOP of Land : IDR 764.225.000,- (seven hundred sixty four million two hundred twenty five thousand rupiah).

b. Tax Object Number: 51.03.060.006.029-0193.0

c. Registered in the name: **I WAYAN TURUN**

d. Total Tax Payable is IDR 6.935,- (six thousand nine hundred and thirty five rupiah)

Halaman 7

KARTU DATA
Sampai dengan tanggal : 05 Desember 2022

NOP	: 51.03.060.006.029-0193.0	Alamat WP	: BR PELAMBIANGAN
Nama WP	: I WAYAN TURUN	Alamat OP	: SB SEMAT
Luas Bumi	: 275,00	Luas Bangunan	: 0,00
NJOP/M2 Bumi	: 2.779.000	NJOP/M2 Bangunan	: 0
NJOP Bumi	: 764.225.000	NJOP Bangunan	: 0

Tanggal	No. Bukti	Uraian	SPPT (Rp.)	Setoran (Rp.)	Sisa (Rp.)	Denda (Rp.)	Setoran (Rp.)	Sisa Denda (Rp.)
22/05/2020		SPPT Tahun 2020 (Jatuh Tempo Tanggal 2020-11-30)	0		0			0
16/03/2021		SPPT Tahun 2021 (Jatuh Tempo Tanggal 2021-09-30)	0		0			0
02/02/2022		SPPT Tahun 2022 (Jatuh Tempo Tanggal 2022-09-30)	0		0			0
Total :			1.686.764	1.688.474	0	105.545	98.610	6.935

Generated at : 05/12/2022 10:26:52 +0800

Land Tax Print out from Dinas Pendapatan Daerah Kabupaten Badung



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Advocate & Legal Consultant
+62 878 6220 0812

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D. Zoning & Designation of The Land

The zones on the 2 plots of land for Freehold Certificat (SHM) Number 9077/Tibubeneng Village and Freehold Certificat (SHM) Number 7688/Tibubeneng Village are included in the **Mixed Zone of Housing and Trade/Services Subzone (C-1)**, where business activities that are allowed to be built in this area include :

- 1) **Tourist Cottage** KBLI No. 55130 is a type of business providing lodging services for the public with daily payments made by individuals using residential buildings that are occupied by the owner and partially used for rent by providing opportunities for tourists to interact in the owner's daily life. This business sector is allocated to Cooperatives, Micro, Small and Medium Enterprises (MSMEs) as regulated in Presidential Regulation No. 49 of 2021 concerning Amendments to Presidential Regulation No. 10 of 2021 concerning Investment Business Sector;
- 2) **Villa** KBLI No. 55193 is a type of business providing public accommodation services, which are private houses specially rented out to tourists with their facilities and managed by the owners themselves. This business sector is allocated to Cooperatives and Micro, Small and Medium Enterprises (MSMEs) as regulated in Presidential Regulation No. 49 of 2021 concerning Amendments to Presidential Regulation No. 10 of 2021 concerning Investment Business Sector;
- 3) **Restaurant** KBLI No. 56101 is a type of service business serving food and beverages for consumption at their place of business, located in part or all of a permanent building, equipped with services including cooking and serving to order. Based on BKPM Regulation Number 4 of 2021 in Article 12, the exceptions and minimum investment value provisions for PMA are that the total investment is higher than Rp. 10,000,000,000.- (ten billion rupiah), excluding land and buildings per business sector KBLI 5 (five) digits per project location;
- 4) **Drink House/Café** KBLI No. 56303 is a type of business providing mainly hot and cold drinks for consumption at the place of business, located in part or all of a permanent

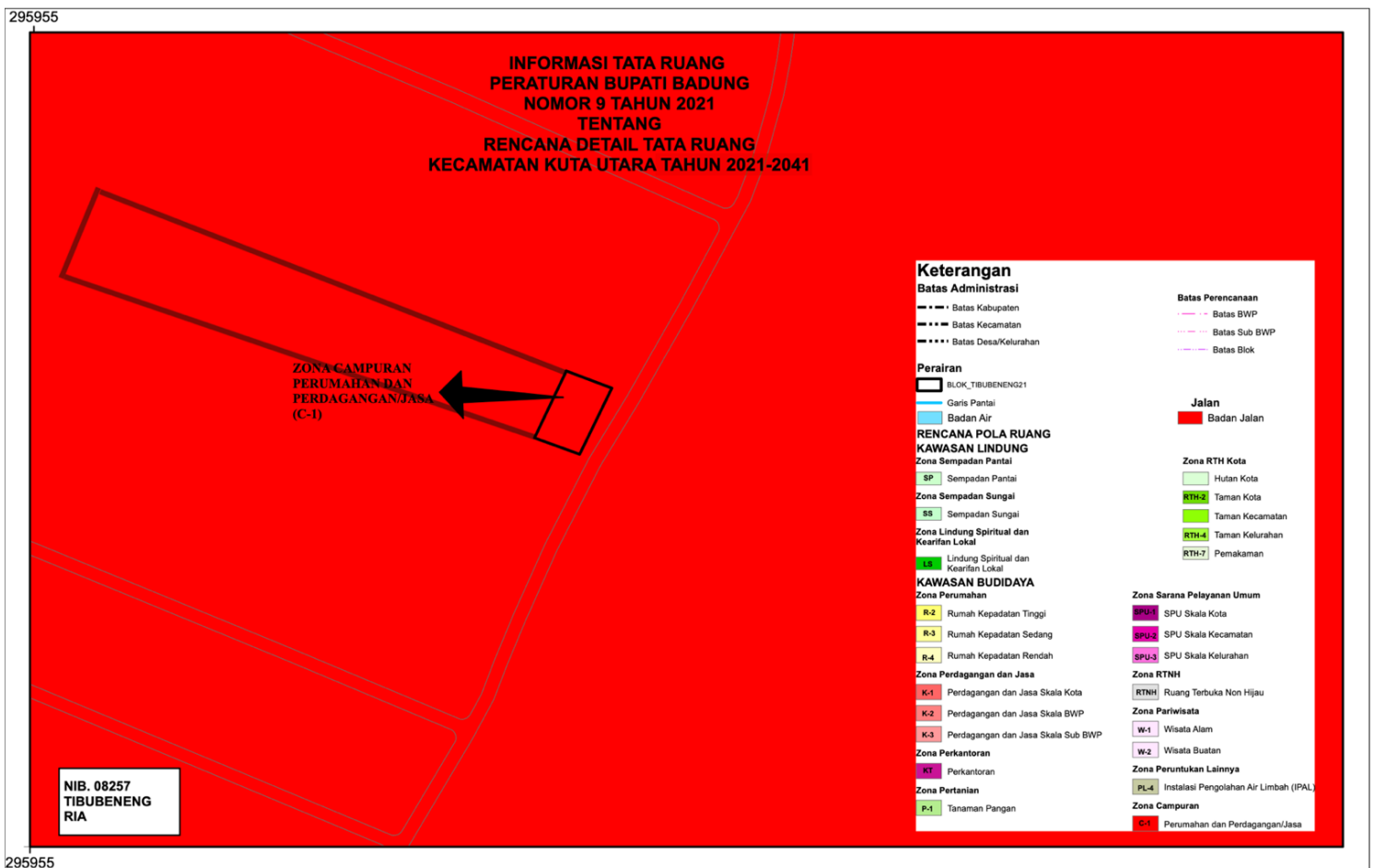


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building, whether or not equipped with tools/equipment for the manufacturing and storage processes and whether or not and has received a decision letter as a drinking house from the institution that supervises it or not yet. Based on BKPM Regulation Number 4 of 2021 in Article 12, the exceptions and minimum investment value provisions for PMA are that the total investment is higher than Rp. 10,000,000,000.- (ten billion rupiah), excluding land and buildings per business sector KBLI 5 (five) digits per project location.



Spatial Information at One-Stop Integrated Service Investment Office, Badung Regency



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Advocate & Legal Consultant
+62 878 6220 0812

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CONCLUSION

1. Whereas, Freehold Certificate (SHM) Number 9077/Tibubeneng Village on behalf of **I WAYAN TURUN** and Freehold Certificate (SHM) Number 7668/Tibubeneng Village on behalf of **I WAYAN TURUN** belong to the heirs of **I WAYAN TURUN**, namely **I WAYAN YASA** , **I NYOMAN PUJAWAN** and **I KETUT PUJI ARSANA** based on the Family Tree Statement and the Declaration of Inheritance duly acknowledged by the relevant authorities but both certificates has not yet been transferred to the respective benefactor names;
2. Whereas based on the results of the land and building tax print out on the Freehold Certificate (SHM) Number 9077/Tibubeneng Village for a land object of 2,100 m² it has been paid in full and there are no dues/arrears, while the print out of the Land and Building Tax Freehold Certificate (SHM) Number 7688 /Tibubeneng Village for land objects with an area of 150 m² on the print out of the land area written 275 m² there is a fine of IDR 6,935 (six thousand nine hundred and thirty five rupiah remaining);
3. Whereas Freehold Certificate (SHM) Number 9077/Tibubeneng Village and Freehold Certificate (SHM) Number 7688/Tibubeneng Village are in the **Mixed Zone of Housing and Trade/Services Subzone** (C-1), therefore business activities that are allowed to be built in this area:
 - 1) Tourist Cottage;
 - 2) Villa;
 - 3) Restaurant;
 - 4) Drink House/Café;

Or in general for Housing, Trade and Services purpose.



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RECOMMENDATION

1. Whereas the process of lease of the Freehold Certificate (SHM) Number 9077/Tibubeneng Village and Freehold Certificate (SHM) Number 7668/Tibubeneng Village may be carried out by attaching legal documents of the Death Certificate of **I WAYAN TURUN**, the Family Tree Statement and the Declaration of Inheritance. To ensure security, we recommend that the heirs of **I WAYAN TURUN** namely **I WAYAN YASA, I NYOMAN PUJAWAN, and I KETUT PUJI ARSANA** to perform the necessary inheritance process and transfer the names of Freehold Certificates in order avoid unforeseen obstacles or conditions that are detrimental to the Client if problems occur in the future. Furthermore, the inheritance title transfer may be necessary in order to obtain related operational permits/licenses;
2. Whereas we recommend that the heirs of the Freehold Certificate (SHM) Number 7668/Tibubeneng Village make a mutation (update) to the SPPT/PBB with NOP Number 51.03.060.006.029-0193.0 in the name of **I WAYAN TURUN** with an area of 275 m² to match the current land area this is 150 m² and the heir must pay the remaining fine at the SPPT/PBB for a land object of 150 m² before the lease transaction is carried out;
3. Whereas before signing the lease and start building, we recommend that the client to determine business activities plan and building to be built at both lands because not all business activities can be carried out by the client's PMA. In accordance to the client's current Business Identification Number (NIB), the client may apply for A. Advertisement (*Periklanan*), B. Other Consulting & Management, C. Owned/Leased Real Estate and D. Fee/Contract Based Real Estate.
4. Due to the Zoning of the Lands, it is recommended but notwithstanding the law and regulation to apply for **Villa / Tourism Cottage** Building Permit. Noting on the unavailability of obtaining such permit directly under the Client's PMA, it is advised to engage into an agreement with the



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+62 878 6220 0812

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Landowners in order to obtain the Villa / Tourism Cottage Building Permit on behalf of the landowner name. once obtained, the client then able to manage and operate the property and obtain OSS and operational licenses through the PMA under Owned/Leased Real Estate and Fee/Contract Based Real Estate Business Scope.

Due to the findings above, we deemed that both plots of land are safe to lease provided that the owner and the client follows our recommendations as stated herein.

We trust that the above is properly explained and self-explanatory. However, should there's any questions or concerns do not hesitate to contact us to discuss the content of this report.

Best Regards,

IDA BAGUS ANGGA MANUWANGSA, SH.

MADE ARDIAN PRIMA PUTRA, SH., MH.