

BALI INVEST ADVISORS

Jalan Pemelisan Agung, Village/Kelurahan
Tibubeneng, Kec. North Kuta, Kab. Badung,
Province of Bali
+62 817 79 09 04 93
info@baliinvestclub.com
NPWP: 50.078.018.4-906.000

LEGAL DUE DILIGENCE ON KAMMARA LOFTS

A. PREAMBLE

In connection with the investment plan proposed by Mr. Denis Ivanov, the Director of PT BALI INVEST MANAGEMENT, particularly regarding the introduction to the market, investor acquisition, and advertising of **KAMMARA LOFTS**, located in Canggu Village, North Kuta District, Badung Regency, we have conducted a legal review of the relevant documents and regulations as described in Attachments below. The report presented herein covers specific matters outlined below, strictly limited to the legal review and based on the assumptions and disclaimers described afterward.

A.1. STRUCTURE OF LDD

A. Preamble

A.1. Structure of LDD

A.2. Documents to review

A.3. Confidential Information

A.4. Assumptions

A.5. Disclaimer

B. Analysis

B.1. Land Entitlement (including BPN Checking)

B.2. Spatial Information (including ITR Zone Checking & Construction Reference Data)

B.3. Lease Agreement

B.4. Tax Payments

B.5. Road Access

B.6. Building Permits

C. Relevant Regulations

D. Conclusion

E. Attachments

A.2. DOCUMENTS TO REVIEW

The scope of the legal review includes analyzing the following legal documents on land entitlement and building namely:

1. Proprietary Title Certificate (*Sertipikat Hak Milik/SHM*) No. 7189/Canggu Village dated 09 January 2012;
2. Proprietary Title Certificate (*Sertipikat Hak Milik/SHM*) No. 8195/Canggu Village dated 14 November 2013;
3. Deeds on Land Lease Agreement (*Akta Sewa Menyewa Tanah*) No. 11 dated 22 January 2021;
4. Land Certificate Checking to BPN on SHM No. 8195/Canggu Village dated 11 April 2023;
5. Online Spatial Information of Land Checking to Badung Regency Spatial Board (ITR) dated 01 December 2023 on SHM No. 7189/Canggu Village;
6. Online Spatial Information of Land Checking to Badung Regency Spatial Board (ITR) dated 01 December 2023 on SHM No. 8195/Canggu Village;
7. Building Approval (*Persetujuan Bangunan Gedung*) No: SK-PBG-510306-17112023-001 dated 17 November 2023, Certificate of Building Feasibility (*Sertifikat Laik Fungsi*) No: SK-SLF-510306-29102023-001 dated 29 October 2023;
8. SPPT PBB 2023 of SHM No. 7189/Canggu Village and on SHM No. 8195/Canggu Village;
9. Citizenship Identification Number (*Kartu Tanda Penduduk/KTP*), Family Card (*Kartu Keluarga/KK*) and Inheritance Letter of the landlord;
10. Citizenship Identification Number (*Kartu Tanda Penduduk/KTP*) of the lessee;

A.3. CONFIDENTIAL INFORMATION

This report is made based on the softcopy documents provided, as per instructions, we have requested clarification and completion of documents from clients, both through text and email. Information and clarification on matters raised during the due diligence were obtained via email and the receipt of document copies from clients ("Source of Information").

The purpose of the report is to serve as confidential and legal information for the sole use of the Client. It is intended strictly for the personal considerations of the Client and has not been copied, circulated, quoted, or disclosed to, or used or relied upon by any other person or entity without our prior written consent.

This report has been prepared based on reviews, research, and discussions among members of the reviewer team.

A.4. ASSUMPTIONS

Unless stated otherwise in this report, we assume:

1. The authenticity of all signatures, seals, and dates, as well as the correct identity, legal capacity, and authority of all signatories and corporate officers, and the due execution and validity of all documents reviewed in accordance with applicable laws;
2. The authenticity, completeness, and factual accuracy of all documents reviewed and corporate records presented as originals or copies;
3. The accuracy and correctness of the statements and information provided to us by Mr. Denis Ivanov, the Source of Information, and/or the party designated to provide us with necessary documents and information.

A.5. DISCLAIMER

This report does not contain any implied or express warranties regarding the accuracy or completeness of its information if the documents and information provided to Bali Invest Advisors do not align with reality. The Client retains the autonomy to decide whether to adhere to or disregard the results of the analysis and recommendations presented by Bali Invest Advisors. Bali Invest Advisors holds no responsibility for any legal actions stemming from inaccurate information presented or decisions made by clients in the future.

B. ANALYSIS

B.1. LAND ENTITLEMENT

I. Proprietary Title Certificate (*Sertipikat Hak Milik/SHM*)

The Proprietary Title Certificate is commonly known as SHM. The Proprietary Title serves as evidence of land ownership and is the highest land title that can only be obtained by Indonesian nationals.

1. **SHM No. 7189/Canggu Village, issued on 09 January 2012**, contains the following records:

- a) Located in Canggu Village, North Kuta District, Badung Regency, Bali Province, with NIB: 22.03.08.02.04256;
- b) The certificate is held under **I NYOMAN SWEDANA** and was obtained through affirmation and acknowledgment of rights No: 510306000402800520;
- c) Entitlement Assertion recorded in the Registration List No: 140/BA-51.03.300/I/2012 dated 09 January 2012;
- d) Measurement Letter (*Surat Ukur*) No. 02480/Canggu/2012, dated 09 January 2012, covers a land area of 3.950 m² (three thousand and nine hundred fifty square meters);
- e) The land area is designated for a rice field, and the land borders were appointed by I Ketut Sudjanaan, S.H., M.H., measured and mapped by Budi Witjaksono. The land is recorded in Map Registration Number 50.1.22.044-10-6, Box A-4.5.

2. **SHM No. 8195/Canggu Village, issued on 14 November 2013**, contains the following records:

- a) Located in Canggu Village, North Kuta District, Badung Regency, Bali Province, with NIB: 22.03.08.02.04767;
- b) The certificate is held under **I NYOMAN SWEDANA**;
- c) Entitlement Assertion recorded in the Registration List No: SK.135/HM/BPN.51.03/2013 dated 22 August 2013;
- d) Measurement Letter (*Surat Ukur*) No. 03480/Canggu/2013, dated 08 October 2013, covers a land area of 570 m² (five hundred and seventy square meters);
- e) The land area is designated for a rice field, and the land borders were appointed by I Nyoman Swedana, measured and mapped by I Made Padma. The land is recorded in Map Registration Number 50.1.22.044-10-5, Box E-4.

II. Land Certificate Checking

The Land Certificate Checking on SHM No. No. 8195/Canggu Village was issued dated 11 April 2023 by BPN Office of Badung Regency, submitted by Komang Tri Gita Hartati as Land Deed Official (PPAT) of Badung Regency.

This checking reports on:

- a) That the land is not being in a pledged, is not on a blocked condition, there is no confiscation on the land, is not on an internal blocked condition and there is no conflict or dispute upon it.
- b) Other information which stipulated in SHM No. 8195/Canggu Village is correct and have the same information as the Board of National Land (*Badan Pertanahan Nasional/BPN*).

III. Land Owner's Information

I NYOMAN SWEDANA, is the landowner of SHM No. 7189/Canggu Village and SHM No. 8195/Canggu Village. He has deceased as registered in Excerpt of Death Certificate (*Kutipan Akta Kematian*) No. 5103-KM-28082019-0005 dated 28 August 2019.

He has left a wife and two daughters. His wife is **Ni Ketut Sujati** who also has signed the Main Lease Agreement. His daughters namely **Ni Luh Sunarti** who also has signed the Main Lease Agreement and Ni Nengah Ariati. Ni Luh Sunarti has already been married to I Wayan Rianta (already deceased) and has two children namely Ni Luh Putu Dewi Puspita and I Made Diva Prananta Jaya. Under the Inheritance Statement Letter dated 02 December 2019 stipulated that the heirs of I Nyoman Swedana are **Ni Ketut Sujati** and **Ni Luh Putu Dewi Puspita** and **I Made Diva Prananta Jaya**.

IV. Lessee's Information

RUDI LAZUARDI is the Lessee. His information under the identity card (KTP) with Citizenship Identification Number (NIK): 317308180960007. He is the Chief of Family as stipulated under the Family Card (Kartu Keluarga/KK) No: 3173080104100047.

As an Indonesian citizen who has a real estate business, not as a legal entity but as an individual business owner, it is possible to have a business without establishing a legal entity such as a limited company. It is also clear that all financial reports, taxation, licenses and permits will be obtained under his personal name.

It will be considered as a Micro and Small Business (*Usaha Mikro dan Kecil/UMK*). Despite that, it does not reduce his obligation to comply with the laws and regulations in a real estate business activity.

B.2. SPATIAL INFORMATION

SHM No. 7189/Canggu Village, under online spatial checking, accessed on 01 December 2023, stipulates that the land area of NIB: 22.03.08.02.04256 and SHM 8195/Canggu Village under online spatial checking, accessed on 01 December 2023, stipulates that the land area of NIB: 22.03.08.02.04767 indicates the land is marked in **red color**, classified as **C-1 High-Intensity Mixed Use Zone**.

It is informed that C-1 as the designation of space that consists of a mixture of residential and non-residential areas with a medium to high intensity of land use/density of the built-up zone. If there are no environmental carrying capacity limitations and local socio-cultural value provisions, the maximum building coverage (KDB) for high-intensity mixed-use areas is 80%, and the building height is more than 5 floors.

Under the **High-Intensity Mixed Use Zone**, it is allowed to build relevant buildings according to Mr. Denis's plan, such as:

1. Local resident's house;	Allowed
2. Single residential house (> 100 - 200 m ²);	Allowed
3. Medium-sized Single House (> 200 - 400 m ²);	Allowed
4. Medium-Large Single House (> 400 - < 1000 m ²);	Allowed
5. Large Single House (> 1000m ²);	Allowed
6. Boarding house/lodging (> 15 rooms);	Allowed
7. Tourist lodges;	Allowed
8. Youth hostels;	Allowed
9. Villas.	Allowed

- **Boarding house in a C-1 provision as follows:**

Zone	Zone Code	Sub-zone	Sub-zone code	Building Covered Ratio (KBD)	Floor Area Ratio (KLB)	Basement Footprint (KTB)	Building Borders (GSB)	Building Height	Description
Mixed	C	High-Intensity Mixed Use Zone	C-1	60%	1,8	60%	One lane of road space and added with road verge	15 m	Maximum of 1 floor for the basement.

B.3. LEASE AGREEMENT

I. Main Lease Agreement

Deeds on Land Lease Agreement (*Akta Sewa Menyewa Tanah*) No. 11 dated 22 January 2021, was made before R HERMAN BOY PRAKOSO, S.H., M.Kn, Notary in Badung Regency (hereinafter referred to as “Akta No. 11 or Main Lease Agreement”).

The Main Lease Agreement records the following details:

- a. **The Parties** are **Ni Ketut Sujiati** and **Ni Luh Sujiati** on behalf of **Niluh Putu Dewi Puspita** and **I Made Diva Prananta Jaya** as the heirs of the land owner namely I Nyoman Swedana and **Rudi Lazuardi** as the Lessee;
- b. **The Lease Object in total is 1.660 m2** (one thousand six hundred and sixty-six square meters) it is leased from 2 (two) land plots with 2 (two) land certificates as follows:
 - a partial land of approximately 1.090 m2 (one thousand and ninety square meters) from a land plot of 3.950 m2 (three thousand nine hundred and fifty square meters) as recorded in SHM No. 7189/Canggu Village;
 - a land plot of 570 m2 (five hundred and seventy square meters) as recorded in SHM No. 8195/Canggu Village.
- c. **The Lease Period** lasts 32 (thirty-two) years and 6 (six) months, started from 05-11-2019 till 05-05-2052;
- d. **The Lease Price** has been paid in full at the signing of Akta No. 11;
- e. **Landlord's Guarantees:**
 - The landowner of the heir is the sole party with the rights to lease the leased property. Therefore, the lessee could exercise their rights without any disturbance.
 - The land and lease object are not subject to confiscation, mortgage, or any debt collateral and are free from PBB delinquency. If there are any charges, the landowner will settle them at their own risk and expense.
 - A road access with a width of 3 (three) meters, located on the west side of the lease object, is granted for joint use between both parties, buyers, or other lessees without any compensation.
 - The Lessee is responsible for road access maintenance and expenses.
- f. **Land Utilization:** The Lessee is allowed to use the land for residential or business purposes based on licenses granted by the authority. The lessee

can install, at their own expense, a building, electricity installation, water supply, and telephone.

- Building permits on the Lease object are the Lessee's obligation to apply for and at their own expense.
 - All buildings and installations not extended after the Lease period will belong to the landowner without compensation, while removable objects will remain with the Lessee.
- g. **Road Access:** The Lessee is granted a 3 (three)-meter width on the west side of the lease object for joint use between both parties, buyers, or other lessees without any compensation.
- h. **Sublease Terms:**
- the Lessee is allowed to sublease all or part of the land and/or building established on the lease land without approval from the landowner.
- i. **Lease Extension:** The lessee is allowed to extend the lease period for a minimum of 5 (five) years and a maximum of 25 (twenty-five) years, with the lease price extension determined and approved by both parties based on the normal land price. The extension should be notified within 3 months before the lease period ends.
- j. **Option Rights:** The Lessee has an option from the landowner to buy the land arising after the lease period ends. The Lessee must decide within 1 (one) month after the lease ends. If the option is not used, the landowner has the right to lease or sell the land to other parties.
- k. **Bills, Taxes and Other Costs:**
- All bills on the Lease object including electricity, water, telephone and other cost should be paid up by the Lessee;
 - Land and Building Tax (PBB) of SHM 7189/Canggu Village shall be paid by the Lessee in full;
 - Land and Building Tax (PBB) of SHM 8195/Canggu Village shall be paid by the Lessee proportionally to the leased land.
- l. **Discharging:** The lessee is considered negligent if they do not fulfill their obligation to discharge the lease object (building) within two weeks. The landowner has no obligation to provide a warning letter. The lessee is also given the authority, or authorized with substitution rights, to the landowner to:
- discharge all removable objects and furniture owned by the Lessee;

- Seek assistance from official institutions and comply with all legal terms for discharging.
- m. **Akta No. 11** will not end with selling of the land for any causes and/or with the death of the parties;
- n. **Dispute Settlement:** Both parties agreed to settle disputes in Denpasar City District Court.

B.4. TAX PAYMENT

I. SPPT PBB SHM 7189/Canggu Village

There is a tax invoice letter of land and building (*Surat Pemberitahuan Pajak Terutang Pajak Bumi dan Bangunan/SPPT PBB*) of SHM No. 7189/Canggu Village, under Tax Object Number (*Nomor Objek Pajak/NOP*): 51.03.060.004.028-0052.0 under **the tax payer name is I Nyoman Swedana**, with tax object of land on a 3.950 m² (three thousand and nine hundred fifty square meters) with a PBB bills of Rp. 3.044.067,- (three million and forty four thousand and sixty seven Rupiah). PBB of 2023 has not been provided yet.

II. SPPT PBB SHM 7189/Canggu Village

There is tax invoice letter of land and building (*Surat Pemberitahuan Pajak Terutang Pajak Bumi dan Bangunan/SPPT PBB*) of SHM No. 8159/Canggu Village, under Tax Object Number (*Nomor Objek Pajak/NOP*): 51.03.060.004.028-0087.0 under **the tax payer name is I Nyoman Swedana**, with tax object of land on a 570 m² (five hundred and seventy square meters) with a PBB bill of Rp. 40.128,- (forty thousand and one hundred twenty-eight Rupiah). PBB of 2023 has not been provided yet.

III. PPh

Income Tax (*Pajak Penghasilan/PPh*) upon Akta No. 11 has not been provided yet.

B.5. ROAD ACCESS

In accordance with the Main Lease Agreement, the lessee is entitled to create a private road access extending from the main road to the Lease object, which will be the property of the Lessee.

B.6. BUILDING PERMIT

1. PBG and SLF of Kammara Lofts

Building Approval (*Persetujuan Bangunan Gedung*) No: SK-PBG-510306-17112023-001 dated 17 November 2023, Certificate of Building Feasibility (*Sertifikat Laik Fungsi*) No: SK-SLF-510306-28102023-002 dated 29 October 2023, stipulated that a building which established upon SHM No. 7189/Canggu Village, for a technical building plan of size of 251.55 m² (two hundred fifty one point fifty five square meters) has been approved.

C. RELEVANT REGULATION

I. Laws and Regulation on Lease Agreement

- Freedom of Contract Principle and Indonesian Civil Code (“Agreement Laws”)
 - a. Pursuant to the laws and regulations in Indonesia, the Freedom of Contract Principle is adopted, where the contents of the agreement are made based on the agreed terms and conditions of the parties. However, the Freedom of Contract Principle is bound by the provisions of Article 1320 of the Indonesian Civil Code.
 - b. Article 1320 of the Indonesian Civil Code regulates the following provisions:
 - 1) The agreed consent of the parties;
 - 2) The competence of the parties to enter into a binding agreement;
 - 3) The existence of a specific object of the agreement;
 - 4) The presence of a lawful cause.
- Laws No. 2 of 2014 on Changes on Laws No. 30 of 2004 on Notary

In accordance with Article 15, paragraph 2, letter b, the Notary is empowered to create a deed related to land. An agreement documented in a notarial deed is considered authentic. An authentic deed serves as conclusive evidence that is complete both in form and substance. Consequently, the judge is relieved of the need to scrutinize the veracity, unless contradictory evidence challenging the deed's accuracy is presented.

II. Laws on Lands

- Laws No. 5 of 1960 on Fundamental Agrarian Principles

- Government Regulation No. 24 of 1997 on Land Registration

Land titles in Indonesia include:

- a. Proprietary Title (*Hak Milik*/HM)
Hak Milik is a hereditary, strongest and fullest rights that can be owned by Indonesian citizens on land.
- b. Building-Utilize Title (*Hak Guna Bangunan*/HGB)
Hak Guna-Bangunan is a right to construct and own buildings on land that is not one's own, for a maximum period of 30 years, able to get extension for a maximum of 20 years, and obtain a renewal for another 30 years., which can be owned by Indonesian citizens and a legal entity established under the Indonesian law and domiciled in Indonesia.
- c. Utilization Title (*Hak Pakai*/HP)
Hak Pakai is the right to use and/or collect products from land which is directly controlled by the State or land owned by others, which gives the authority and obligations specified in the decision to grant it by the official authorized to grant it or in an agreement with the owner of the land, which is not a lease agreement or land processing agreement.

Hak Pakai on State Land and Cultivated Land with a period of 30 years, renewable for a period of 20 years, and renewable for a period of 30 years, which can be owned by Indonesian citizens and a legal entity established under the Indonesian law and domiciled in Indonesia, and a foreign person.
- d. Lease Title (*Hak Sewa*)
Hak Sewa is the right to use someone else's land for a building purpose, by paying the owner a sum of money as a lease payment. Those who can become leaseholders are Indonesian citizens, foreigners domiciled in Indonesia, legal entities established under the Indonesian law and domiciled in Indonesia, foreign legal entities that have representatives in Indonesia.

General information on land certificate:

1. Land Certificates serve as evidence of title for various land rights, including land rights, cultivation rights, waqf land, ownership rights over apartment units, and mortgage rights. Each of these rights is recorded in the relevant land book.

2. A Land Certificate may only be presented to the party whose name appears in the relevant land book as the right holder or to another party authorized by them.

III. Laws and Regulation on Tax

- Laws No. 28 of 2009 on Regional Tax and Retribution

Taxpayers are individuals or entities, including taxpayers, tax reducers, and tax collectors, who have taxation rights and obligations in accordance with the provisions of the regional taxation laws and regulations.

Rural and Urban Land and Building Tax (PBB) is a tax on land and/or buildings owned, controlled, and/or utilized by individuals or entities, except areas used for plantation, forestry, and mining business activities. for plantation, forestry, and mining business activities.

- Laws No. 06 of 2023 on Work Creation part Taxes

Foreigners who work and earn income in Indonesia including as foreign taxpayers will be subject to Income Tax 26 at 20% of the gross amount by the party who is obliged to pay as stipulated in Article 111 number 2 of Laws on Work Creation part Taxes.

On income received or earned by foreign taxpayers in and/or from Indonesia, the payment method is as follows:

1. Self-fulfillment of its tax obligations for those conducting business or activities in a permanent establishment in Indonesia; and/or
2. Withholding by the party obliged to pay for foreign taxpayers.

IV. Laws and Regulation on Spatial

- Badung Regent Regulation No. 09 of 2021 on Spatial Plan of North Kuta District (“North Kuta District Spatial Plan Regulation”)

General information related to Spatial as follows:

- 1) Detailed Spatial Plan, hereinafter abbreviated as RDTR, is a detailed plan on the spatial planning of the Regency area which is equipped with zoning regulations.

- 2) Zoning regulations, hereinafter abbreviated as PZ, are provisions that regulate space utilization requirements and control provisions and are prepared for each Block/Zone designation in the RDTR.
- 3) Part of the Planning Area, hereinafter abbreviated as BWP, is part of the Badung Regency area for which RDTR is prepared, in accordance with the direction of the Badung Regency RTRW. RTRW of Badung Regency.
- 4) A zone is a region or area that has specific functions and characteristics.
- 5) A Subzone is a part of a Zone that has certain functions and characteristics that are detailed from the functions and characteristics of the Zone.
- 6) The Mixed Zone, hereinafter referred to as Zone C, is a space designation that is part of a cultivation area developed to accommodate several functional designations and/or is integrated, such as housing and trade/services, housing and offices, trade/services offices, housing and tourism, or agriculture and tourism and etc.
- 7) The Housing and Trade/Services Subzone, hereinafter referred to as Subzone C-1, is a space designation that is part of a cultivation area developed to accommodate several mixed and integrated function designations between housing and trade and services, especially tourism services.
- 8) The Agriculture Zone, hereinafter referred to as Zone P, is a spatial designation developed to accommodate activities related to the exploitation and cultivation of certain plants, feeding, housing, and raising animals for personal or commercial purposes.
- 9) The Food Crops Subzone, hereinafter referred to as Subzone P-1, is a space designation developed to accommodate activities related to the exploitation and cultivation of food crops on both rice fields and non-rice fields.
- 10) Basic Building Coefficient, hereinafter abbreviated as KDB, is the percentage ratio between the area of the entire ground floor of the building and the area of land/plot/planning area controlled in accordance with the spatial plan and RTBL.
- 11) Building Floor Coefficient which hereinafter is abbreviated as KLB is the number percentage of the ratio between the area of the entire floor

of the building and the land area of the mapping/planning area that is controlled in accordance with the spatial plan and RTBL.

- 12) Green Area Coefficient, hereinafter abbreviated as KDH, is the percentage ratio between the area of all open space outside the building intended for landscaping/greening and the land area of the plot/planning area controlled according to the spatial plan and RTBL.
- 13) Building Setback Line, hereinafter abbreviated as GSB, is the boundary that limits the closest distance of a building to the edge of the road, calculated from the outermost limit of the sewerage (riol) to the outermost limit of the building front, functioning as a space divider, or the minimum free distance from the outermost plane of a building mass to the land controlled, the boundary of the riverbank or beach, between other building masses or channel plans, high voltage electricity networks, gas pipelines, and etc.
- 14) Basement Footprint Coefficient, hereinafter abbreviated as KTB, is the number percentage between basement floor area and land area.

V. Laws and Regulation on Building

- Government Regulation No. 16 of 2021 on Implementation Regulation of Laws No. 28 of 2002 on The Buildings. (“The Buildings Laws”)

General information related to Spatial as follows:

- 1) Building is a physical form of construction work construction that is integrated with its location, partly or wholly located above and/or in the land and/or water, which serves as a place for humans to carry out their activities, both for residential or living space, religious activities, business activities, social activities, cultural, and special activities.
- 2) Building Approval (*Persetujuan Bangunan Gedung*) which hereinafter is abbreviated as PBG is a permit that is given to building owner to build new, change, expand, reduce, and/or maintain the building in accordance with the standard of Building technical Standards.
- 3) Certificate of Building Feasibility (*Sertifikat Laik Fungsi*) hereinafter abbreviated as SLF is a certificate given by the Local Government to certify the feasibility of the building function before it can be utilized.
- 4) Building Ownership Evidence Letter (*Surat Bukti Kepemilikan Bangunan Gedung*), hereinafter abbreviated as SBKBG, is a letter of evidence of rights to building ownership status.

- 5) Building Owner, hereinafter referred to as Owner is a person, legal entity, group of people, or association, which according to the law is legal as Building Owner.
- 6) Manager is an organizational unit, or business entity that is responsible for the operational activities of Building operational activities, implementation of operation and maintenance in accordance with the procedures determined efficiently and effectively.
- 7) Buildings must meet technical standards in the form of one of which is the standard of Building planning and design, standard of implementation and supervision of Building construction, standard of Building Utilization.
- 8) Owners who do not fulfil the suitability of function assignment in PBG are subject to administrative sanctions in the form of:
 - a. written warning;
 - b. restriction of development activities;
 - c. temporary or permanent suspension of work implementation of development;
 - d. temporary or permanent suspension on Building utilization;
 - e. freezing of PBG;
 - f. revocation of PBG;
 - g. freezing of Building SLF;
 - h. revocation of Building SLF; and/or
 - i. order for Building Demolition.

D. CONCLUSION

I. Bali Invest Advisor's Conclusion

Based on above, the following are the conclusions and matters to be concerned about:

1. Whereas, SHM 7189/Canggu Village and SHM 8195/Canggu Village are located next to each other under the same land owner namely I Nyoman Swedana. The land under SHM 8195/Canggu Village where Kammara Lofts are located is in good validation.
2. Whereas, I Nyoman Swedana has passed away, leading to the inheritance of the land by the heirs.
3. Whereas, it is advisable for the heirs to update the land certificates to reflect their names.
4. Whereas, the Main Lease Agreement is valid according to the Indonesian Laws. The lease rights are given for 32 (thirty-two) years and 6 (six) months, with the rights to sublease it without giving any notice to the land owner and the road access has already been duly granted.
5. Whereas, Kammara Lofts have already obtained the building permit.

E. ATTACHMENTS

Attachment 1: Official Land Certificate Checking on SHM No. 8195/Canggu Village



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

PENGECEKAN SERTIPIKAT

No Berkas : 14217 / 2023
NTPN : 820230410000890 10/04/2023 12:44:00

Sertipikat

- Jenis Hak : Hak Milik
- No Hak : 08195
- Desa CANGGU
- No Seri : 8Q340752
- NIB : 22030802.04767
- No SU.03480/2013
- No SK : SK.135/HM/SPN.51.03/2013
- Luas : 670 m2
- Tanggal Penerbitan : 14/11/2013
- Tanggal Berakhir Hak :
- Asal Hak : Pemberian Hak

Nama Pemilik

- I NYOMAN SWEDANA, BADUNG, 31 DESEMBER 1950

Penunjuk

- -

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

Pengecekan Sertipikat ini diterbitkan atas permohonan

- Nama Pemohon :KOMANG TRI GITA HARTATI selaku RPAT

* Hasil Pengecekan ini diterbitkan tanggal 11 April 2023 pukul 14:23:24

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

* Pastikan keabsahan pengisian form pemegang hak atas tanah ini dengan bentuk dan isinya melalui aplikasi 'Sertifikat Tanahku' atau <https://bhn.go.id>

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



Ditandatangani secara elektronik oleh:

Berni Marwan, S. S
NIP. 19800404001120003

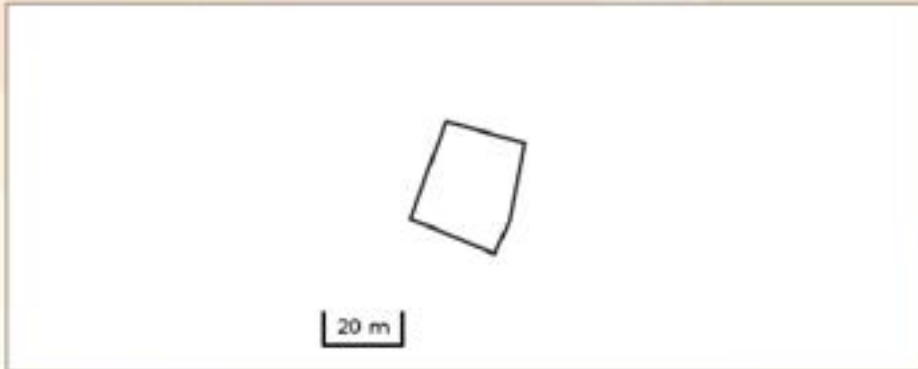
Petunjuk:

- Aktifkan dan gunakan Sertifikat Elektronik yang diterbitkan dengan Tanda Tangan Elektronik yang telah diterbitkan oleh B2-E.
- Dianggap melakukan penyalahgunaan apabila menggunakan Sertifikat Elektronik yang telah diterbitkan.
- Dianggap melakukan penyalahgunaan apabila melakukan informasi elektronik dan/atau dokumen elektronik yang diterbitkan Pasal 223 KUHPidana dengan ancaman pidana penjara paling lama 10 (sepuluh) tahun penjara ditambah denda paling lama Rp 12 (dua belas) miliar.



1/2

Informasi peta bidang tanah :



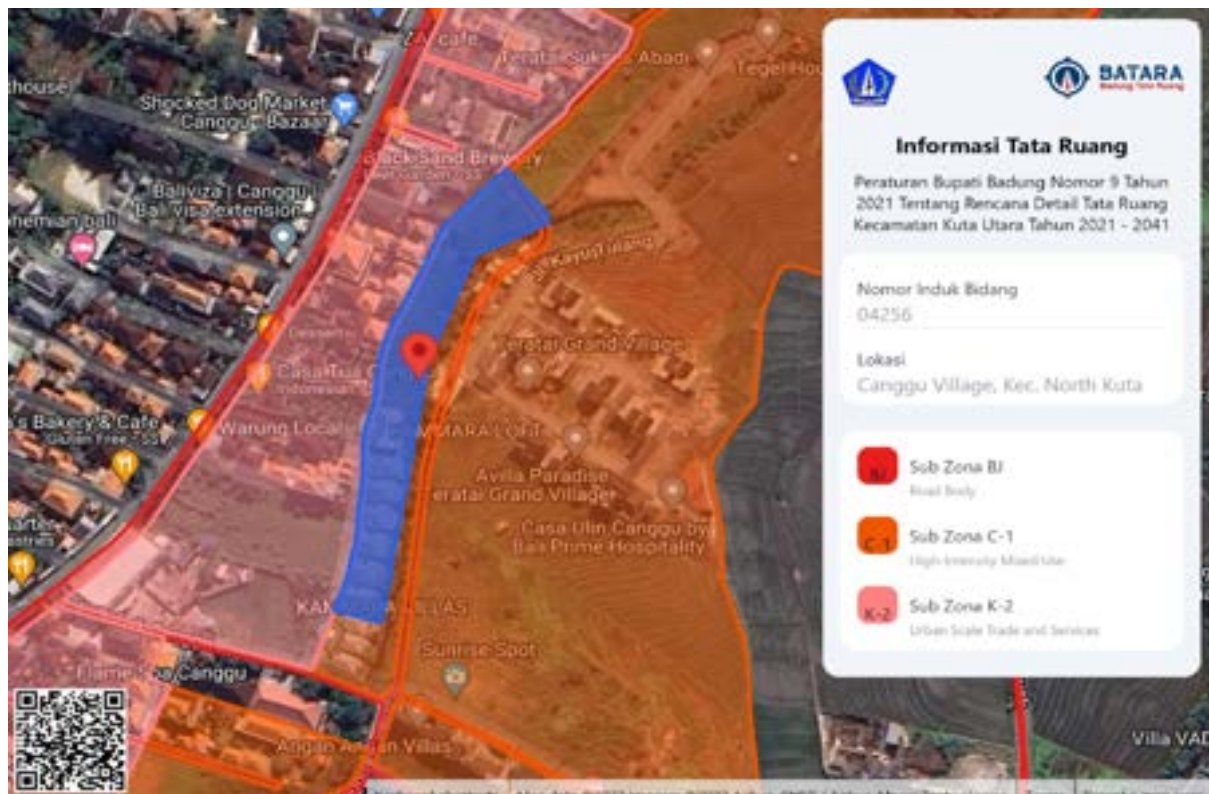
Keterangan : Rencana Detil Tata Ruang/Rencana Tata Ruang Wilayah belum terintegrasi

Petunjuk :

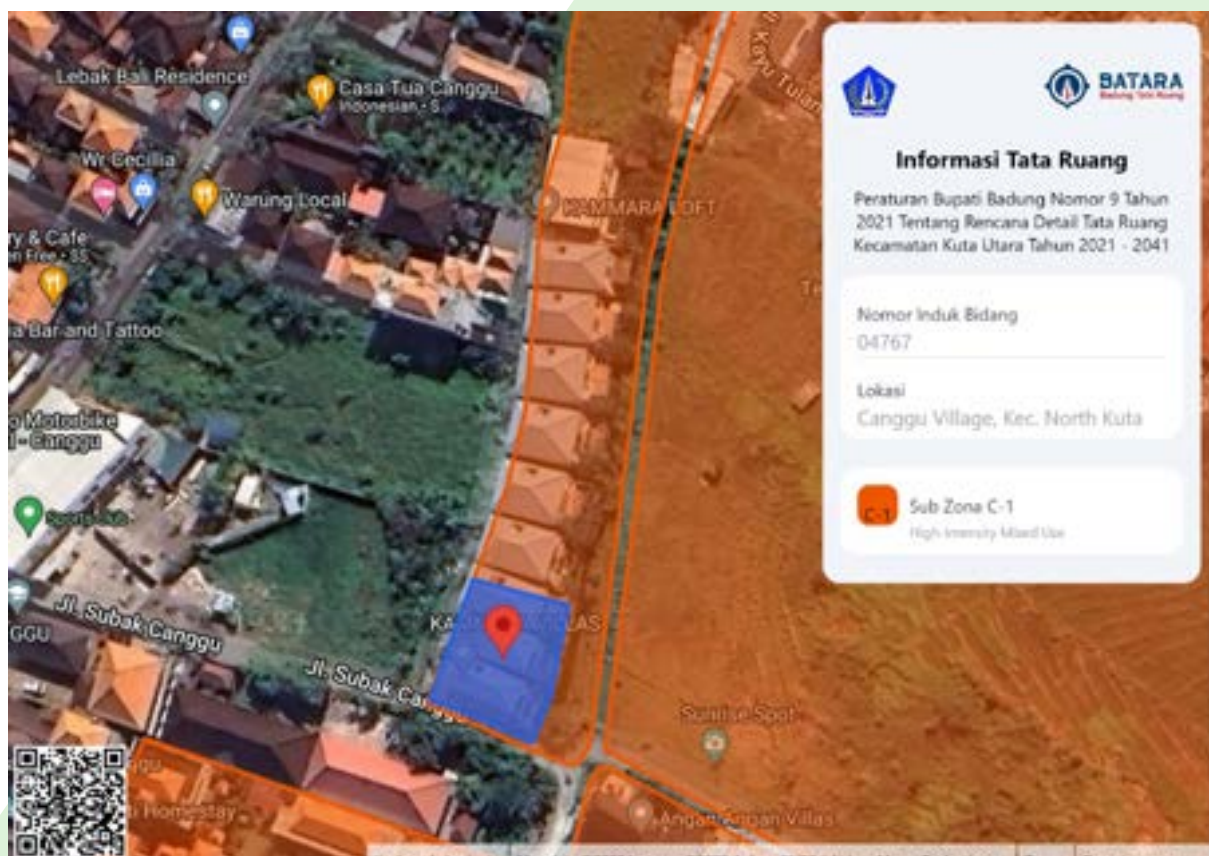
- Aki dokumen ini berbentuk Dokumen Elektronik yang diintegrasikan dengan Tanda Tangan Elektronik yang telah disahkan oleh BKR.
- Diarsip melalui penyajian dan atau pengarsipan kepada pihak lain yang tidak terak.
- Diarsip melalui penyajian dan atau pengarsipan informasi elektronik dan atau dokumen elektronik dapat diberikan Pasal 263 KUHPidana dengan ancaman pidana penjara (1 tahun) atau penjara dengan Pasal 26 dari Pasal 51 (1) UU ITE dengan ancaman hukuman paling lama 12 (dua belas) tahun penjara dan denda paling banyak Rp 12 miliar.



Attachment 2: Official Online Spatial Information on SHM No. 7189/Canggu Village



Attachment 3: Official Online Spatial Information on SHM No. 8195/Canggu Village





PEMERINTAH REPUBLIK INDONESIA
PERSETUJUAN BANGUNAN GEDUNG
Nomor : SK-PBG-510306-17112023-001

Membaca	: Permohonan Persetujuan Bangunan Gedung Nomor : SK-PBG-510306-17112023-001 Tanggal 17-11-2023 Nama pemohon/Pemilik : Dra. Yulianty Bangunan gedung : Penyedia Akomodasi Alamat : KP Gebang, Kel/Desa Uwung Jaya, Kec. Cibodas, Kota Tangerang, Prov Banten Untuk : Bangunan Eksisting Fungsi Bangunan Gedung : Fungsi Usaha Klasifikasi bangunan Gedung : Bangunan Sederhana Nama bangunan gedung : Penyedia Akomodasi Luas Bangunan Gedung : 251.55 Hak atas tanah : Sertifikat Luas tanah : 3950.00 meter persegi Pemilik Tanah : I Nyoman Swedana Terletak di : Jl. Pantai Batu Bolong, Kel/Desa Cangu, Kec. Kuta Utara, Kab. Badung, Prov Bali
Menimbang	: Bahwa setelah memeriksa (mencatat/meneliti), mengkaji, dan menilai /evaluasi serta menyetujui dokumen rencana teknis bangunan gedung sebagaimana dimaksud di atas dengan ini disahkan, maka terhadap permohonan persetujuan bangunan gedung yang dimaksud dapat diberikan persetujuan dengan ketentuan sebagaimana dalam lampiran keputusan ini.
Mengingat	: 1. Undang-Undang Nomor 28 Tahun 2002 tentang Bangunan Gedung (Lembaran Negara Republik Indonesia Tahun 2002 Nomor 134) 2. Peraturan Pemerintah Nomor 16 Tahun 2021 Tentang Peraturan Pelaksanaan Undang-undang Nomor 28 Tahun 2002 Tentang Bangunan Gedung (Lembaran Negara Republik Indonesia Tahun 2021 Nomor 26) 3. Peraturan Pemerintah Pengganti Undang-Undang Republik Indonesia Nomor 2 Tahun 2022 tentang Cipta Kerja 4. PERDA KABUPATEN BADUNG NO. 4 TAHUN 2022 TENTANG RETRIBUSI PERSETUJUAN BANGUNAN GEDUNG
Memperhatikan	: Berita Acara Hasil Pemeriksaan Dokumen Rencana Teknis TPA Gedung Nomor 640/1280/BA/SEKRETARIATSIMBGPUPR/2023 Tanggal 19 Oktober 2023 (untuk Bangunan Gedung Kepentingan Umum)

Memutuskan

Menetapkan

- : 1. Persetujuan Bangunan Gedung kepada:
- | | |
|-------------------|--|
| Nama Pemohon | : Dra. Yulianty |
| Atas nama pemilik | : Dra. Yulianty |
| Bangunan gedung | : Penyedia Akomodasi |
| Alamat | : Jl. Pantai Batu Bolong, Kel/Desa Canggu, Kec.
Kuta Utara, Kab. Badung, Prov Bali |
| Untuk | : Bangunan Eksisting sebagaimana dijelaskan
dalam gambar situasi Lampiran b dan rencana
teknis, meliputi gambar arsitektur, gambar
konstruksi bangunan gedung, dan gambar utilitas
(mekanikal dan elektrikal), pembekuan dan
pencabutan PBG Lampiran c, dan penghitungan
besarnya retribusi PBG dalam Lampiran d
Keputusan ini; |
2. Besarnya retribusi yang harus dibayar oleh pemohon sebagaimana
Dimaksud dalam Lampiran d Keputusan ini sebesar:
- a. Retribusi Persetujuan Bangunan Gedung Rp. 9.005.897
(Sembilan juta lima ribu delapan ratus sembilan puluh tujuh rupiah)
*) untuk perubahan PBG atas permintaan pemilik.
3. Lampiran Keputusan ini merupakan satu kesatuan yang tidak terpisahkan dari
Keputusan ini;
4. Hal-hal yang belum diatur dalam Keputusan ini akan ditetapkan kemudian;
5. Salinan Keputusan ini diberikan kepada yang berkepentingan; dan
6. Keputusan ini mulai berlaku sejak tanggal diterbitkan.



DITETAPKAN DI : BADUNG
PADA TANGGAL : 17-11-2023
ATAS NAMA BUPATI BADUNG
KEPALA DINAS PENANAMAN MODAL
DAN PELAYANAN TERPADU SATU
PINTU KABUPATEN BADUNG

Dr. Ir. I Made Agus Aryawan, S.T., M.T.
NIP : 19720828 199803 1 018

**PEMERINTAH DAERAH
BADUNG**



SERTIFIKAT LAIK FUNGSI

Nomor :SK-SLF-510306-29102023-002

PROVINSI : BALI
KABUPATEN/KOTA : KAB. BADUNG
KECAMATAN : KUTA UTARA
DESA/KELURAHAN : CANGGU

**DINAS PENANAMAN MODAL DAN
PELAYANAN TERPADU SATU PINTU
KABUPATEN BADUNG**



**PEMERINTAH REPUBLIK INDONESIA
SERTIFIKAT LAIK FUNGSI BANGUNAN GEDUNG**

Nomor : SK-SLF-510306-29102023-002

Berdasarkan Surat Pernyataan Pemeriksaan Kelaikan Fungsi Bangunan Gedung

Nomor : SK-SLF-510306-29102023-002 Tanggal : 29 Oktober 2023

Menyatakan bahwa :

Nama Bangunan Gedung

Penyedia Akomodasi

Fungsi Bangunan Gedung

Fungsi Usaha

Klasifikasi Bangunan Gedung

Perhotelan

Nomor PBG

SK-PBG-510306-17112023-001

Nama/Pemilik Bangunan Gedung

Dra. Yulianty

Lokasi Bangunan Gedung

Jl. Pantai Batu Bolong, Kel/Desa Cariggu, Kec. Kuta Utara, Kab. Badung, Prov Bali

Sebagai

LAIK FUNGSI

Dalam Batas Okupansi

8 Orang

sesuai dengan lampiran sertifikat ini

yang merupakan bagian yang tidak terpisahkan.

Sertifikat Laik Fungsi ini berlaku selama 5 tahun sejak diterbitkan.



DITETAPKAN DI :KAB. BADUNG

PADA TANGGAL : 29 Oktober 2023

ATAS NAMA BUPATI BADUNG

KEPALA DINAS PEKERJAAN UMUM DAN

PENATAAN RUANG

Ir. Ida Bagus Surya Suamba, S.T.,M.T.

NIP. 197209161997031004



LEMBAR PENCATATAN HISTORIS

TANGGAL PENERBITAN SERTIFIKAT LAIK FUNGSI BANGUNAN GEDUNG

Nama Pemilik Bangunan Gedung : Dra. Yulianty
Klasifikasi Bangunan Gedung : Tidak Sederhana
Lokasi Bangunan Gedung : Jl. Pantai Batu Bolong, Kel/Desa. Canggu, Kec Kuta Utara,
Kab. Badung, Prov Bali
Jumlah Lantai Bangunan Gedung : 2Lantai
Luas Lantai Bangunan Gedung : 251.55m
Luas Dasar Bangunan Gedung : 251.55 meter persegi
Luas Tanah :m

No Urut	Tanggal SLF	Nomor SLF	Lingkup Sertifikat Layak Fungsi

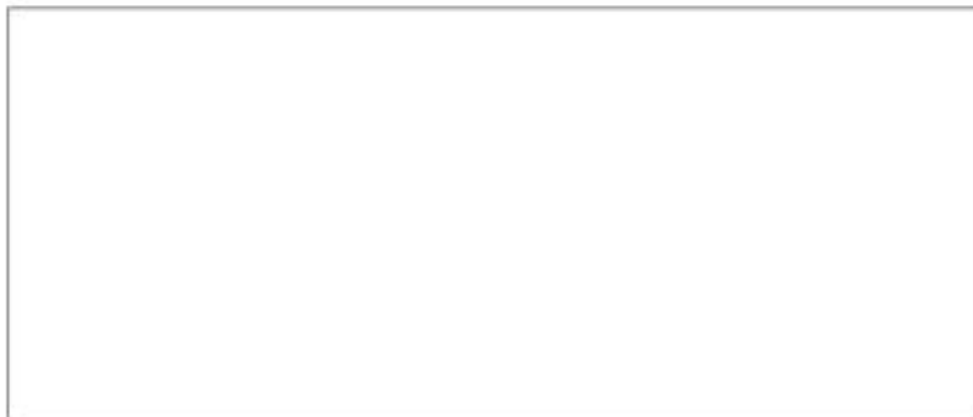
CATATAN : Lampiran 1 ini merupakan bagian yang tidak terpisahkan dari Sertifikat Laik Fungsi Bangunan Gedung Nomor : SK-SLF-510306-29102023-002 Tanggal 29 Oktober 2023



LEMBAR PENCATATAN HISTORIS

TANGGAL PENERBITAN SERTIFIKAT LAIK FUNGSI BANGUNAN GEDUNG

Nama Pemilik Bangunan Gedung	: Dra. Yulianty
Klasifikasi Bangunan Gedung	: Tidak Sederhana
Lokasi Bangunan Gedung	: Jl. Pantai Batu Bolong, Kel/Desa. Canggu, Kec Kuta Utara, Kab. Badung, Prov Bali
Jumlah Lantai Bangunan Gedung	: 2Lantai
Luas Lantai Bangunan Gedung	: 251.55m
Luas Dasar Bangunan Gedung	:m
Luas Tanah	:m



CATATAN : Lampiran 2 ini merupakan bagian yang tidak terpisahkan dari Sertifikat Laik Fungsi Bangunan Gedung Nomor : SK-SLF-510306-29102023-002 Tanggal 29 Oktober 2023

Attachment x: the Land Certificates and KTP of the Land Owners and the Lessee

***The documents cannot be attached due to advancements in technology, aimed at preventing forgery. Additionally, in accordance with Indonesian Land Laws, it is considered private and confidential.**