

Legal Protection of Shareholders against Corporate Hijacking Practices Through GMS (RUPS) Engineering and Manipulation of the General Legal Administration System

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Abstract

The practice of unlawful corporate takeovers (corporate hijacking) through the engineering of the General Meeting of Shareholders (GMS/RUPS) and data manipulation on the Legal Administrative System (AHU Online) of the Ministry of Law of the Republic of Indonesia poses a severe threat to legal certainty and shareholder rights protection in Indonesia. This normative legal research aims to analyze the legal implications of procedurally and materially defective GMS decisions, determine the boundaries of legal liability for Notaries and the Directorate General of AHU, and formulate preventive and repressive legal protection mechanisms for aggrieved shareholders. The findings demonstrate that fictitious or engineered GMS decisions are void ab initio (van rechtswege nietig) (Harahap, 2016), rendering all derivative decisions non-executable. Notaries who fail to conduct formal verification can be held liable under civil tort (PMH), administrative-ethical sanctions, and criminal provisions for complicity in document forgery (Hanako et al., 2023)¹. Aggrieved shareholders can pursue repressive protection by blocking company profiles on SABH (Lohan & Partners, 2025)², filing state administrative lawsuits at the PTUN within a strict 90-day window (ILS Law Firm, 2024)³, filing tort lawsuits at the District Court, and initiating criminal reports. The Ministry of Law is recommended to transform AHU Online from a passive registration system into a smart verification platform utilizing two-way digital authentication for all shareholders to ensure corporate data integrity.

Keywords: Corporate Hijacking, Shareholders, Engineered GMS, AHU Online, Legal Protection.



INTRODUCTION

The practice of unlawful corporate power takeover (corporate hijacking) in Indonesia has undergone an increasingly sophisticated transformation of *modus operandi* (Surya et al., 2023). . The conventional pattern of relying on open acquisition of shares in the capital market has now shifted towards the use of procedural loopholes in the holding of the General Meeting of Shareholders (GMS/RUPS) as well as administrative hacking through the Legal Entity Administration System (SABH) or AHU Online managed by the Directorate General of General Legal Administration of the Ministry of Law of the Republic of Indonesia (Surya et al., 2023; Wijaya, 2025). This exploitation generally targets closed limited liability companies where internal conflicts between shareholders are used by certain parties to unilaterally take over the company's juridical control (Harahap, 2016).

The digital transformation of the General Legal Administration (AHU Online) system based on the principle of declarative registration is intended to simplify legal services and accelerate investment in Indonesia (Surya et al., 2023; Zamili, 2022). However, this administrative efficiency creates fundamental vulnerabilities when not balanced with a strict substantive testing mechanism at the time of data input (Izinkilat, 2025). Parties with bad faith take advantage of the leniency of physical verification by submitting a fabricated GMS (RUPS) document to the Notary to be poured into an authentic deed, which is then uploaded to the AHU Online portal to issue an endorsement or acceptance of changes in the company's data (Hanako et al., 2023). Once the Decree or Acceptance Letter is issued, the intruder formally acquires legal legitimacy to control the management, block the legal administrator, and transfer the company's assets (Dernierra, 2026; Loh and Partner, 2026).

The main problem faced in corporate law enforcement is to determine the limits of legal protection for shareholders harmed by the act of corporate hijacking (Hadjon, 2011; Harahap, 2016). The holding of the GMS (RUPS) not only violates the formal provisions of Law Number 40 of 2007 concerning Limited Liability Companies (UUPT) (JDIH Kemenkeu, 2007), but also damages the legal order of civil partnerships and state administrative law (Hanako et al., 2023; Wijaya, 2025). Therefore, a doctrinal and practical review is needed regarding the legal consequences of the GMS procedural defects, the degree of legal accountability of the Notary who issued the deed, the effectiveness of the State Administrative Lawsuit (TUN) at the State Administrative Court, and the Unlawful Acts Lawsuit (PMH) in the District Court in order to provide complete restoration of rights (*restitutio in integrum*) (Hadjon, 2011; Harahap, 2016).



PROBLEM FORMULATION

Based on the above background description, the formulation of the problem in this study is as follows:

1. What are the legal consequences and validity of the decision of the company's organs as well as the receipt of notification of data changes in the General Legal Administration System (AHU Online) that was born from the fabrication of a fictitious GMS (RUPS) or procedural defect?
2. What is the form of legal protection (preventive and repressive) and legal accountability of the parties involved for shareholders harmed by corporate hijacking practices?

RESEARCH METHODOLOGY

This scientific research uses a type of normative legal research (doctrinal legal research), which is research that examines legal rules, legal doctrines, and legal principles that are relevant to the problem being researched.

- *Statute Approach*: Reviewing the provisions of the Limited Liability Companies Law (UU No. 40/2007 jo. UU Cipta Kerja), the Notary Office Law (UU No. 30/2004 jo. UU No. 2/2014), and the State Administrative Court Law /PTUN (UU No. 5/1986 jo. UU No. 51/2009)
- *Conceptual Approach*: Examine the theory of legal protection, the theory of legal certainty, the doctrine of Business Judgment Rule, and the general principles of good governance (AUPB)
- *Case Approach*: Analyzing jurisprudence and court rulings that have attained permanent legal force, such as Supreme Court Decision No. 644 K/Pdt/2017, Decision of the Jakarta State Administrative Court No. 290/G/2016/PTUN. JKT, Cibinong District Court Decision No. 46/PDT. G/2023/PN CBI, and Supreme Court Decision No. 773 PK/Pdt/2019.

RESULTS OF RESEARCH AND DISCUSSION

Legal Implications and Validity of Corporate Decisions Engineered by GMS on AHU Online

The phenomenon of corporate hijacking in Indonesia is operated through a conspiratorial scheme that combines manipulation of company legal procedures, misrepresentation of Notaries, and the use of the Ministry of Law and Human Rights' electronic processing system (Hanako et al., 2023; Surya et al., 2023). Understanding the anatomy of these irregularities is crucial to determine the legal consequences (Harahap, 2016).

The holding of an engineering GMS generally begins with procedural and material violations that are deliberately designed to oust target shareholders without their knowledge (Malarissa,



2025). This mode manifests itself in the form of a total fictitious GMS or abuse of a circular resolution based on Article 91 of the UUPT (Swara Justisia, 2024)⁹. Article 91 of the UUPT stipulates that shareholders can make legal decisions outside the GMS on the condition that all shareholders give their consent in writing. In practice, the hackers forge signatures or deliberately do not involve the majority/target shareholders (Hanako et al., 2023). In addition, summons engineering ignores a minimum deadline of 14 working days (Article 82 paragraph 1 of the UUPT) (JDIH Kemenkeu, 2007) or sends invitations to fictitious addresses (Malarissa, 2025).

The birth of the notary deed and the ratification of the Ministry of Law and Human Rights from the GMS created juridical complexity regarding the status of the enforceability of corporate decisions (Harahap, 2016). In the legal doctrine of companies and alliances in Indonesia, there is a fundamental dichotomy between null and void decisions (null and void / *van rechtswege nietig*) and voidable decisions (voidable / *vernietigbaar*) (Harahap, 2016; Marzuki, 2017).

Aspects of Categorization	Procedural Defect in the General Meeting of Shareholders (RUPS)	Material Defect in the General Meeting of Shareholders (RUPS)
Forms of Violation	Violation of the summons procedure (Article 82 of the Constitution), media announcement errors, or the location of the meeting violates the Articles of Association (Malarissa, 2025).	Completely fictitious General Meeting of Shareholders (GMS), forgery of signatures on a circular resolution (Article 91 of the Company Law), false quorum, and false causa (Hanako et al., 2023)
The Nature of Legal Defects	Internal administrative-procedural irregularities of the company (Harahap, 2016).	Violation of the subjective and objective conditions of the validity of the alliance (Article 1320 of the Indonesian Civil Code) (Harahap, 2016).
Status of Invalidity	Cancelable (<i>Vernietigbaar</i>) (Harahap, 2016).	Null and void (<i>Van Rechtswege Nietig</i>) (Harahap, 2016).
Juridical impact	The decision remains	The decision was considered to



	binding on the company until there is a court decision that cancels it (Harahap, 2016).	have never existed from the beginning (<i>ab initio</i>); All legal consequences are automatically eliminated (Harahap, 2016).
Third-Party Binding	Binding third parties in good faith based on Article 95 paragraph (3) UUPT (Harahap, 2016).	Absolute disqualification; does not give rise to new legal rights and obligations (Harahap, 2016).

A formal defect entitles an aggrieved shareholder to petition the District Court for annulment (*vernietigbaar*) (Harahap, 2016). Conversely, a material defect affects the essential validity of the General Meeting of Shareholders (RUPS) (Harahap, 2016). Holding a fictitious General Meeting of Shareholders or forging signatures violates the objective requirements for the validity of a legal engagement as stipulated in Article 1320 *jo.* Article 1337 of the Indonesian Civil Code (regarding a lawful cause) (Hanako et al., 2023). Under universal civil law principles, a legal act based on a false or prohibited cause is null and void by operation of law (*van rechtswege nietig*) (Harahap, 2016). Legally, a resolution resulting from such a fabricated General Meeting of Shareholders is deemed never to have existed (*ab initio*) (Harahap, 2016).

The collapse of the validity of this engineering GMS (RUPS) has direct implications for the loss of the protection of the Business Judgment Rule (BJR) for new management (Harahap, 2016). Article 97 paragraph (5) of the Constitution stipulates that the protection of the BJR is only given if the Board of Directors acts in good faith (Harahap, 2016). The holding of a fictitious GMS (RUPS) is a form of real bad faith, so the hijacked Board of Directors is obliged to be personally responsible (personal liability) based on Article 97 paragraphs (3) and (4) of the Law to his personal property for all losses incurred (Harahap, 2016).

Legal Liability of Notaries and Corporate Organs

Notaries play a key role in the chain of establishing the company's legality (Surya et al., 2023; VCube Indonesia, 2026). As public officials, Notaries are burdened with legal obligations to comply with Law No. 30 of 2004 *jo.* Law No. 2 of 2014 concerning the Notary Position (UUJN) and the Notary Code of Ethics (Hanako et al., 2023).



Form of Accountability	Legal and Regulatory Basis	Violation Parameters	Legal Sanctions & Consequences
Civil Liability	Article 1365 KUHPerdata (<i>Unlawful Acts</i>) (Hanako et al., 2023).	Failure to conduct formal verification, disregarding discrepancies in the GMS (RUPS) minutes, and allowing a legally defective deed. (VCube Indonesia, 2026).	Deeds are degraded into deeds under hand/void; the obligation to pay financial compensation in a personal solider (Hanako et al., 2023; Wardhani, 2017).
Criminal Liability	Articles 263, 264, 266 <i>jo.</i> Article 55 KUHP (Erco Law, 2024).	Participating (<i>deelneming</i>) instructing to enter false information into authentic deeds or falsifying GMS (RUPS) documents (Erco Law, 2024).	Criminal sanctions of imprisonment; become perfect evidence (<i>volledig bewijs</i>) of the nullity of the deed in the PTUN/PN (Erco Law, 2024).
Administrative Accountability & Ethics	UUJN & Notary Code of Ethics (Indonesian Notary Association) (Hanako et al., 2023).	Violation of the obligation to act honestly, equitable, independent, and impartial (Hanako et al., 2023).	Reprimands, temporary dismissals, and dishonorable dismissals by the Notary Supervisory Board (Hanako et al., 2023).

In the realm of the Deed of Statement of Meeting Decision (PKR), the status of the partij deed does not exempt the Notary from the obligation to conduct formal verification duty (VCube Indonesia, 2026). Notaries are required to carefully check the legal authority of the witness, original/copy of the summons letter, proof of the summons receipt, and verification that the



circular decision has been signed by all 100% of the shareholders without exception (Hanako et al., 2023). Gross negligence (*culpa lata*) of Notaries results in authentic deeds losing their probative force and being degraded into deeds under hand or null and void (Hanako et al., 2023; Wardhani, 2017). If the Notary actively knows that the GMS (RUPS) is fictitious but still processes it to AHU Online, the Notary will be charged with forging authentic deeds based on Articles 264 and 266 of the Criminal Code (Erco Law, 2024).

Construction of Preventive and Repressive Legal Protection for Shareholders

Shareholders who are victims of corporate hijacking require the formulation of a comprehensive legal strategy that integrates preventive-administrative measures, state administrative lawsuits, civil lawsuits, and criminal prosecution (Hanako et al., 2023; Wijaya, 2025).

Legal Pathways	Destination Institution	Legal Object/Object	Regulatory Basis & Deadline Requirements	Legal Outcome Targets
Administrative (Preventif)	Directorate General of AHU of the Ministry of Law and Human Rights of the Republic of Indonesia (Wijaya, 2025).	Freezing of SABH Access / Company Profile (GoLaw, 2026; Legal Info, 2022).	Permenkumham 29/2022 & Permenhum 2/2025; Applicant min. 1/10 shares or 51% (Fitrianggraeni & Wulandari, 2025; Hasan, 2022)	Locking in the status quo of PT; preventing further transfer of shares/assets (Legal Indonesia, 2026).
State Administration (PTUN)	State Administrative Court (ILS Law Firm, 2024) ³ .	Decree of Legalization/ AHU Acceptance Letter Online (Wijaya, 2025).	Article 53 & 55 PTUN Law; A maximum of 90 days since the KTUN is known (Wijaya, 2025).	Cancellation and revocation of the Ministry of Law and Human Rights Decree;



				restoration of PT profile (Sari, 2020; Wijaya, 2025).
Civil (PN)	District Courts (Hanako et al., 2023).	PKR Notary Deed, GMS (RUPS) Minutes, Compensation (Hanako et al., 2023).	Article 1365 KUHPerdata, Article 97 & 138 UUPT (Hanako et al., 2023; Harahap, 2016).	Statement of GMS (RUPS) null and void; cancellation of the Deed; Solidarity Compensation (Hanako et al., 2023).
Criminal (Police)	National Police of the Republic of Indonesia (Erco Law, 2024).	Compromising Swindlers & Notaries (Erco Law, 2024).	Article 263, 264, 266, 378 KUHP (Erco Law, 2024).	Determination of suspects/defendants; absolute proof of false documents (Erco Law, 2024).

Urgent preventive measures are carried out through an application to block SABH access based on Permenkumham No. 29/2022 and Permenhum No. 2/2025 by shareholders (at least 1/10 of voting rights or 51% of shares) to freeze the company's profile (Fitrianggraeni & Wulandari, 2025; Hasan, 2022).

Furthermore, repressive measures are taken through:

1. PTUN Lawsuit: Suing the Directorate General of AHU to cancel the Letter of Acceptance of Company Data Changes as a TUN Decision (KTUN) based on Articles 53 and 55 of the PTUN Law within a maximum deadline of 90 (ninety) days from the time the KTUN is known (Wijaya, 2025).



2. Lawsuit for Unlawful Acts in District Court (PN): Canceling the fictitious GMS and the Notary PKR Deed based on Article 1365 of the Civil Code and demanding financial compensation for solidarity (Hanako et al., 2023).
3. Criminal Report to the National Police: Report the crime of falsifying documents (Articles 263, 264, 266 KUHP) to obtain authentic evidence of the determination of suspects that will strengthen their position in the PTUN and District Court sessions (Wijaya, 2025).

This force of legal resistance is consistently supported by the jurisprudence of the courts in Indonesia:

Decision Number & Institution	The Subject of the Dispute	Main Legal Considerations (Ratio Decidendi)	The Operative Part and Concrete Legal Consequences
Supreme Court Decision No. 644 K/Pdt/2017 (Wijaya, 2025).	Manipulation of GMS (RUPS) minutes for unilateral share sales (Wijaya, 2025).	The Supreme Court emphasized that corporate actions that ignore the mechanism of the GMS (RUPS) are unlawful. Manipulative minutes have no legal force (Wijaya, 2025).	Share and sale canceled; Board of Directors punished for Unlawful Acts (PMH) (Wijaya, 2025).
Jakarta PTUN Decision No. 290/G/2016/PTUN. JKT jo. MA No. 232/K/TUN/2017 (Sari, 2020).	Cancellation of the Decree of the Ministry of Law and Human Rights on the Ratification of Legal Entities (Sari, 2020).	The KTUN issued by the Ministry of Law and Human Rights on the basis of documents that raise doubts must be canceled	The Decree on the Ratification of the Ministry of Law and Human Rights was declared null and void and required to be revoked (Sari,

		because it violates the Principle of Prudence (Sari, 2020).	2020).
Cibinong District Court Decision No. 46/PDT. G/2023/PN CBI (Hanako et al., 2023).	PMH Notary on the Fictitious PKR GMS Party Deed (Hanako et al., 2023).	The notary was proven to be PMH for neglecting to test the formal verification of the validity of the circular approval and proof of the summoning of the GMS (RUPS) (Hanako et al., 2023).	Notary deed declared null and void; Notary sentenced to pay damages jointly and severally (Hanako et al., 2023).
Supreme Court Decision No. 773 PK/Pdt/2019 (Harahap, 2016)	Cancellation of EGMS (RUPSLB) and asset guarantee without a valid quorum (Harahap, 2016).	EGMS (RUPSLB) with severe material defects are null and void. All derivative decisions are null and void (Harahap, 2016).	Asset guarantee deeds born from the GMS (RUPS) are declared to have no executory power (Harahap, 2016).

CONCLUSION

1. Fictitious GMS or engineering results that contain material defects are null *and void ab initio* because they violate the objective requirements of the validity of the agreement (Article 1320 *jo.* Article 1337 of the KUHPerdata). As a result, all derivative decisions of the GMS (RUPS) are lost, the legitimacy of the new management collapses, the protection rights *of the Business Judgment Rule* are lost, and the legality of the Company's Data Change Acceptance Letter in the Ministry of Law and Human Rights' Online AHU system is automatically canceled.



2. Shareholders who are victims of corporate hijacking receive comprehensive legal protection through preventive and repressive efforts. Preventive steps are taken by applying for a blocking of SABH access (Permenkumham No. 29/2022 jo. Permenkumham No. 2/2025). Meanwhile, repressive measures include the cancellation of the KTUN of the Ministry of Law and Human Rights through a PTUN lawsuit (within a 90-day deadline), the submission of a PMH lawsuit to the District Court (Article 1365 of the KUHPerdata), and criminal reporting on the alleged forgery of authentic deeds (Articles 263, 264, and 266 of the KUHP) to hold the negligent and involved administrators and Notaries personally accountable.

RECOMMENDATION

1. *Ministry of Law of the Republic of Indonesia*: It is necessary to update the company's registration regulations and integrate a NIK/biometric-based smart verification system and *Multi-Factor Authentication* (MFA) on AHU Online to replace the passive registration system. In addition, the system is required to send real-time electronic approval notifications to each shareholder before the company's data changes are approved.
2. *Indonesian Notary Association (INI) and the Notary Supervisory Council (MPN)*: It is necessary to tighten the SOP for verification of the PKR Deed of GMS (RUPS). Notaries are obliged to ensure the completeness of physical evidence of the summons, the authenticity of the attendance list, and the full (100%) consent of shareholders for circular decisions before issuing the deed, as well as providing ethical sanctions up to dismissal for Notaries who violate.
3. *Shareholders/Business Actors*: It is recommended to include special protection clauses in the Articles of Association (such as the obligation to verify certified digital signatures) and monitor the company's legality profile in SABH regularly.

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