

PROPERTY DUE DILIGENCE REPORT

Report Number: 45/EMERHUB/XII/2024

Date: December 18th, 2024

Client: Migran Kagramanian

Plot: Freehold (SHM) 433

PREPARED BY

CHECKED BY

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1. Executive Summary

This due diligence report has been prepared for Mr. Migran Kagramanian in relation to the proposed leasehold transaction of 675 m² Freehold land (Hak Milik) with Land Number 433, located in Pererenan, Mengwi, Badung Regency, Bali. The land is currently registered under the name of NI GUSTI SAYU NGETIS.

Key Findings and Risk Assessment

Favorable Conditions

- The freehold title is clear, with no encumbrances, disputes, or financial obligations.
- The zoning (Residential with medium intensity) supports multiple uses, including residential complexes, specified-function apartments, and short-term rentals via Pondok Wisata licensing.
- Road access is available with a 3-meter width agreement. However, an additional access road construction (approximately 55-60 meters) is required to connect the plot to the main road.

Minor Issues

- The access road partially infringes on residential properties, reducing the usable width in certain areas.
- An agreement is necessary with the adjoining property owners to secure full rights for alternative access roads if needed.

Critical Issues

- None identified.

Recommendations

1. **Access Road Development:** Prioritize constructing the required additional road segment to ensure seamless access for construction and long-term use.
2. **Documentation:** Obtain a written approval letter from the landowner confirming the lessor's sublease rights to eliminate potential disputes.
3. **Permit Applications:** Initiate the process for building permits aligned with intended usage, ensuring compliance with zoning and building restrictions.

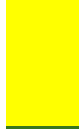
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2. Findings

Legends



The red color indicates an important finding. If the issue is not solved, this may result, or it is recommended to cancel the transaction.



The yellow color indicates findings that are important but resolvable with regular effort.



The green color indicates important information.

No	Finding	Impact	Suggestions
1.	Certificate checking report dated 11 December 2024 for Freehold Certificate Number 433/Pererenan registered under the name NI GUSTI SAYU NGETIS is clear from mortgage, blocking, confiscation, and dispute. Written results can be found below attached.		

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2.	Based on the checking, the zoning for the land is residential with medium intensity (R-3).	This zoning is suitable for businesses as follows: 1. Residential 2. Town houses; 3. Row Houses; 4. Housing Complex; 5. Apartment with Specified Function 6. Pondok Wisata.	If you would like to construct a building for rent, you can apply for a Pondok Wisata license to proceed with it.
	Building Restrictions for Housing Complex Function	Building base coefficient Maximum 65% Building floor coefficient Maximum 2,6 Maximum building height 15 Meters	
	Building Restrictions for Apartment with specified function Apartment with specified function is allowed as long as you obtained the permit to build so by the Housing Department	Building base coefficient Maximum 65% Building floor coefficient Maximum 2,6 Maximum building height 15 Meters	
	Pondok Wisata Function	Building base coefficient Maximum 65% Building floor coefficient Maximum 2,6	

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		Maximum building height 15 Meters	
3	The land and annual building tax checking result shows that there is no outstanding balance and fine.		
4	Regarding Access Road. There is an access road available.		
5	Based on Statement of Decision of The Extraordinary General Meeting of Shareholders of PT Stratton Oakmount Investment, Mr GHEVOND MATEVOSYAN has the attorney to sign a sublease agreement of the leasehold owned by the company.		

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6	Based on the Statement of Decision of The Extraordinary General Meeting of Shareholders of PT Stratton Oakmount Investment, the company can lease the plot based on its business classification code of real estate on a fee or contract basis.		
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3. Site Visit Overview

General Overview

We performed a site visit to the Land located in Tibubeneng, Kuta Utara, Badung, Bali, [-8.633560, 115.132875](#), summarized as follows:

The land is an empty plot of flat land. However, there is some wild plantation.

There is an empty space before the access road reaches your plot. The access road connecting the mainway and an empty space around 55-60 in Length and 3 meters in width before your plot. The access road measures about 3 meters in width.

There should be a plan to construct an additional road in the mentioned empty space to connect your plot with the access road located in the Southeast side of your plot.

For the target access road to the northeast of the plot, it is owned by another landowner and the status of the access is also leased to the leasehold owner of the property north. To acquire the right to use this access, you have to enter into agreement with the landowner and the leasehold owner of the access.

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THE LAND



Based on the GPS coordinates mapping the building sized around 672m², roughly matches the certificate

There are two villas and a residential area that are side to side with your plot. One villa is on the North side and the other is on the West side whereas the residential area is located on the East side of your property.

Land Boundaries for plot size 675sqm as part of SHM No.433/Pererenan.

Land Boundaries of the Land

- North: Villa
- South: Freehold Land
- West: The remaining land plot (Certificate 434/Pererenan)
- East: Freehold Land

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The Land Reference Pictures



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Road Access



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4. Legal Review of The Document and Agreement

a. Freehold Certificate Number 433/2004:

- LAND DETAILS: Land Size 675m² (six hundred seventy five square meters), NIB 00648, Measurement Letter Number 732/Pererenan/2003, dated on 22-12-2003 (twenty two December two thousand and three);
- LEGAL OWNER: NI GUSTI SAYU NGETIS;
- ISSUED BY: The Land Department Office of Badung Regency (Denpasar) dated on 21-05-2004 (twenty first May two thousand and four)

b. Land and Building Tax

- TAX NUMBER: 51.03.020.018.009-0056.0;
- REGISTERED ON BEHALF OF NI GUSTI SAYU NGETIS;
- TAX LEVIED PERIODE 2023: IDR. 0 (land only);
- AVERAGE TAX OBJECT (NJOP): IDR464,000 (land only).

c. Identities of the Landowners

- Land certificate is registered under the name of NI GUSTI SAYU NGETIS

5. Documents Received, Reviewed, and Requests Made

a. Document Received and Reviewed

- Freehold Certificate (SHM) No. 433 under the name of NI GUSTU SAYU NGETIS
- Copy of SPPT-PBB or Annual Land and Building Tax Document Number 51.03.020.018.009-0056.0, registered on behalf NI GUSTI SAYU NGETIS;
- Copy of ID (KTP) of I GUSTI NGURAH MADE SUWITA;
- Copy of ID (KTP) of I GUSTI NGURAH PUTRAYASA;
- Copy of Death Certificate NI GUSTI SAYU NGETIS
- Statement of Decisions of Extraordinary General Meeting of Shareholders PT Stratton Oakmount Investments

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- Genealogy Documents dated 14 December 2021. To be exact, a legal document acknowledging that Mr I GUSTI NYOMAN SUGITA and I GUSTI KETUT SUDIARTA are the legal heirs of Mr I GUSTI PUTU TINTERA (deceased)

b. Request Made to Authorities

- Local Revenue Office (BAPENDA) of Badung Regency Request to print the Land and Building Tax.
Status: *performed*.
- Spatial Planning Agency of Badung Regency.
Consultation and checking the zoning regulation
Status: *performed*.
- Notary Ni Ketut Apriyanti, S.H., M.Kn. in Denpasar Regency.
General assistance and certificate check.
Status: *performed*.

6. Legal Framework

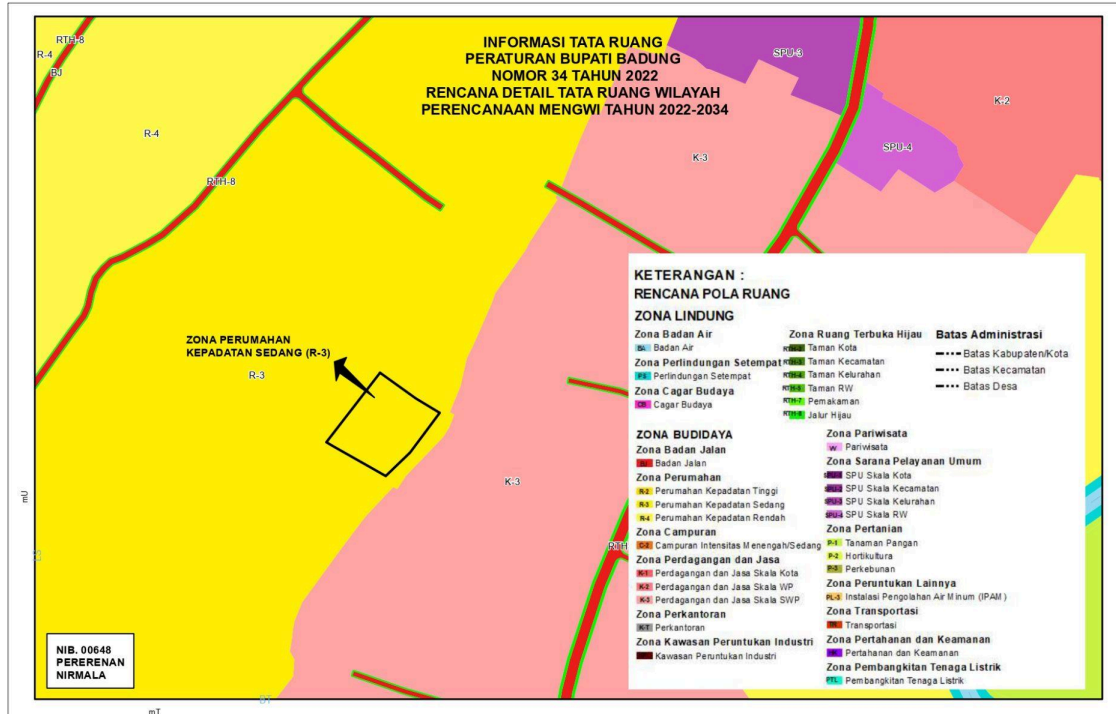
1. *Undang-Undang Dasar Republik Indonesia year 1945 (Indonesian Constitution);*
2. *Law Number 5 the year 1960 regarding basic rules of Agrarian principles;*
3. *Law Number 4 the year 1996 regarding Mortgage of Land and objects related to land;*
4. *Law Number 40 the year 2007 regarding Limited Liability Company;*
5. *Law Number 25 year 2007 regarding Investment;*
6. *Law Number 26 the year 2007 regarding Spatial Planning;*
7. *KUHPer (Indonesian Civil Code) Book III regarding Agreements;*

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8. *Law Number 11 year 2020 regarding Cipta Kerja;*
9. *Regent Regulation of Badung No. 34 of 2022 regarding Detailed spatial plan for Mengwi District 2022–2042;*
10. *Government Regulation Number 5 of 2021 concerning Implementation of Risk-Based Business Licensing;*

7. Appendixes

- a. Zoning Information - The zoning of the land has been confirmed as **Residential with medium intensity. (R Zone).**



- b. Result of land certificate checking to National Land Office via Notary on 11 December 2024



**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 : 72553 / 2024
NTPN : 820241210511442 10/12/2024 15:34:40

Sertipikat

- Jenis Hak : Hak Milik
- No Hak : 00433
- Desa PERERENAN
- No Seri : AU696362
- NIB : 22030518.00648
- No SU.00732/2003
- No SK :
- Luas : 675 m2
- Tanggal Penerbitan : 21/05/2004
- Tanggal Berakhir Hak :
- Asal Hak : Konversi
- Keadaan Tanah : Sebidang tanah sawah

Nama Pemilik

- NI GUSTI SAYU NGETIS, Badung, 31 DESEMBER 1948

Penunjuk

-

Catatan Pendaftaran

-

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
- Bidang tanah tidak terdapat tumpang tindih

Pengecekan Sertipikat ini diterbitkan atas permohonan

- Nama Pemohon :KOMANG TRI GITA HARTATI selaku PPAT

* Hasil Pengecekan ini diterbitkan tanggal 11 Desember 2024 pukul 14:57:59
* 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.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.

Perhatian :

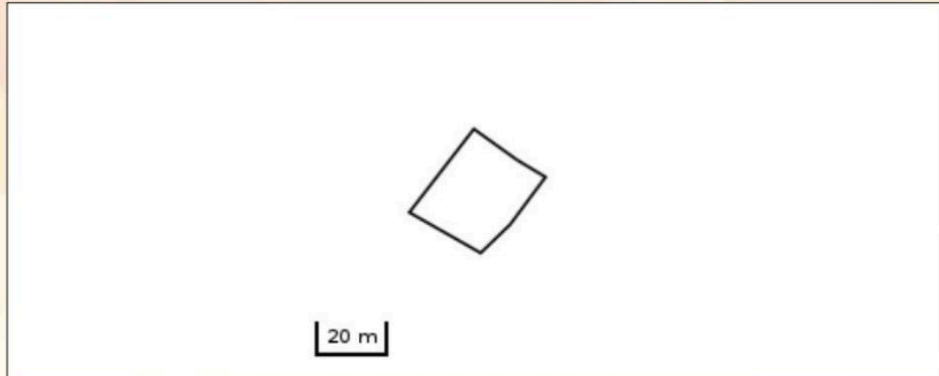
- Asli dokumen ini berbentuk Dokumen Elektronik yang ditandatangani dengan Tanda Tangan Elektronik yang telah disertifikasi oleh BSR/E.
- Dilarang melakukan penyebaran dan/atau pengandaan kepada pihak lain yang tidak terkait.
- Dilarang melakukan pemalsuan surat atau manipulasi informasi elektronik dan/atau 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

Perhatian :

- Asli dokumen ini berbentuk Dokumen Elektronik yang disandatangani dengan Tanda Tangan Elektronik yang telah disertifikasi oleh BSRfE.
- Dilarang melakukan penyebaran dan/atau penggandaan 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 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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- c. Tax Payment Information The annual land and building tax checking result shows that there is no outstanding amount.

KARTU DATA

Sampai dengan tanggal : 13 Desember 2024

NOP : 51.03.020.018.009-0056.0 Alamat WP : BR KANGKANG
Nama WP : NI GUSTI SAYU NGETIS Alamat OP : SB KEDUNGU
Luas Bumi : 675,00 Luas Bangunan : 0,00
NJOP/M2 Bumi : 464.000 NJOP/M2 Bangunan : 0
NJOP Bumi : 313.200.000 NJOP Bangunan : 0

Tanggal	No. Bukti	Uraian	SPPT (Rp.)	Setoran (Rp.)	Sisa (Rp.)	Denda (Rp.)	Setoran (Rp.)	Sisa Denda (Rp.)
02/02/2022		SPPT Tahun 2022 (Jatuh Tempo Tanggal 2022-09-30)	0		0			0
05/04/2023		SPPT Tahun 2023 (Jatuh Tempo Tanggal 2023-11-30)	0		0			0
31/07/2024		SPPT Tahun 2024 (Jatuh Tempo Tanggal 2024-12-13)	0		0			0
Total :			398.751	398.751	0	144.772	144.772	0

8. Important Note

This Due Diligence Report is subject to the following terms and conditions:

a. Legal Framework & Jurisdiction

- This Report has been prepared in accordance with the Laws and Regulations of the Republic of Indonesia and prevailing practices in the relevant jurisdiction
- Analysis reflects regulations in effect as of December 13, 2024

b. Usage & Circulation

- This Report is prepared exclusively for Mr. Migran Kagramanian
- This Due Diligence report is not to be used, circulated, quoted, or referred to for any other purposes
- The scope is strictly limited to matters stated herein and is not to be read as extending by implication to any other matter not specifically referenced

c. Information & Validity

- This Report is based on all information and documents supplied to us which are considered to be valid and correct
- This due diligence report has no binding legal force and cannot be used as evidence in a court
- Content may be subject to change upon receipt of new information, additional documents, or regulatory changes