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DISPUTES CAUSED BY INCOMPATIBILITY WITH THE LAND REGISTRATION PROCESS

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Abstrak

Land registration is a process step in order to obtain legal land ownership status. In the process, land buying and selling needs to be done before a Land Deed Officials so that land registration can be carried out. The National Land Agency as the land registration center carries out the land registration process systematically. The form of land registration is the issuance of a land certificate, but not necessarily the issuance of a land certificate can explain that the land has a strong legal basis because in practice there are still problems with court land disputes. The purpose of this research is to find out the High Court Decision Number 323/PDT/2015/PT.BDG when viewed from the aspect of National Land Law and legal certainty for parties who hold proof of ownership of land rights (certificate) as well as the accountability of government institutions that issue land certificates that turn out to be problematic. The research method uses a normative legal approach with qualitative descriptive data analysis. The results of the study explain that although the system method used by the National Land Agency for land registration is in accordance with Government Regulation Number 24 of 1997 concerning Land Registration, however, the physical data and documents that are required for land registration are still not in accordance so that the land certificate which should be the basis for land ownership turns out to cause conflict in the field because the area of the land does not match the area of the adjoining land.

Keywords: land certificate; land deed officials; land registration; land rights; legal certainty

1. INTRODUCTION

Land rights are owned by all Indonesian citizens, the state controls and manages this on the basis of the prosperity of the people, this is regulated in the 1945 Constitution, article 33 paragraph 3, explaining that "The earth, water and natural resources contained therein are controlled by the state and used as much as possible for the prosperity of the people" (Pelupessy, 2024). (Article 33 (3) of the 1945 Constitution). Land is part of the earth so land is an object regulated in Agrarian Law. In Agrarian Law it does not regulate land in its form and type, but rather regulates subjects that can control land rights from the state in accordance with Article 4 Paragraph 1 of the Basic Agrarian Law, this explains that land must have ownership. (Nugroho et al., 2022; Widjaja, 2014)

Ownership of land rights is not only

owned by individuals but can also be given to legal entities in accordance with statutory provisions. The legal basis for legal entities to obtain ownership rights to land is regulated in Government Regulation Number 38 of 1963 concerning the Designation of Legal Entities that can have ownership rights to land. (Parlindungan, 1999; UTAMA et al., 2022)

Land registration needs to be carried out so that land ownership is recognized by the state. Land registration is an activity carried out by the government continuously and continuously in the form of collecting, processing, bookkeeping, and presenting and maintaining physical data and juridical data in the form of maps and lists of land plots to guarantee legal certainty and meet the needs of the community and government. (Adrian, 2009)

Currently land registration is regulated

by Government Regulation Number 24 of 1997 concerning Land Registration replacing Government Regulation Number 10 of 1961. The result of the land registration process is the issuance of a certificate which is based on article 32 paragraph 1 in Government Regulation Number 24 of 1997 concerning Land Registration "a certificate is a letter of proof of title which acts as a strong means of proof regarding the physical data and juridical data contained therein, as long as the physical data and juridical data are in accordance with the data in the measurement letter and land rights book in question" (Suwardi, 2023).

A certificate is a strong form of evidence so that in the land registration process an accurate registration basis is needed so that in the future there will be no problems with administrative defects due to the failure to carry out the legal land registration process. This is necessary so that the land registration process with the parties involved in the registration process can be carried out carefully so that there will be no errors or administrative defects in the process.

However, there are still administrative defects that occur due to incompatibility of data and the registration process according to land registration procedures. Inaccurate data provided by the applicant, incompatibility of object and subject, and land history administration processes that were not carried out properly so that ultimately the certificate issued was legally flawed.

A legal defect in the certificate will be known if there are parties who are harmed because of this, one of which is because the injured party owns land where part of their land was taken by the owner of the legal defect certificate, The certificate will become a dispute because the injured party will take legal action by filing a lawsuit in court. Cancellation of a land certificate due to administrative defects can be carried out if there is a request or proposal from an interested party to cancel it, namely: (Dotulung, 2018)

"1. Apparatus of the National Land Agency of the Republic of Indonesia who are aware of the data and documents regarding the issuance of invalid land rights regarding the substance and/or process of the issuance and have evidence of errors in the administration procedures for issuing land rights certificates; And;

The party who suffers losses due to the

issuance of a legally flawed certificate of land rights".

If a certificate is legally defective, if it harms another party, it is a dispute and a lawsuit for cancellation can be filed through the State Administrative Court, where the request for a lawsuit for cancellation can be submitted to the State Administrative Agency or Official that issued the certificate, namely Land National Agency (BPN) or can be filed through a lawsuit at the State Administrative Court. (Putra, 2015)

Legal action needs to be taken in order to have a legal action that will be implemented based on the certificate document issued by BPN in the form of land area that has been repaired due to an error in the issuance administration procedure and if a lawsuit is filed in court then the result of the lawsuit that has been finalized will be the basis for the certificate remains valid or not. If the result of the decision states that the certificate is invalid then the decision is also used as a legal basis for execution by BPN to withdraw the certificate issued by BPN.

Based on the following case example, namely in the Bandung High Court case Number 323/PDT/2015/PT.BDG, which before the Bekasi District Court case Number 170/PDT.G/2014/PN.BKS, Drs. Sutikno Citro.MM.MSi Sued PT Antilope Madju as Defendant I, the Mayor of Bekasi as Defendant II, Jati Cempaka Village as Defendant III, and the Regent of Bekasi Regency as Defendant IV where the Plaintiff owns the land based on Sale and Purchase Deed Number 4504/JB/HTS/HJ/I/1626/Jatiwaringin Village.

Furthermore, after a long time the Plaintiff bought the land, it turned out that the surrounding environment had many settlements managed by the business developer PT. Antilope Madju and after the Plaintiff retires from work, the Plaintiff will build a residence on the land, but part of the land has been affected by public facilities and the land for public facilities has been certified as Right to Use Number 7 Jatiwaringin.

Due to this matter, the Plaintiff filed a lawsuit at the Bekasi District Court and the resulting decision stated that the Right to Use Certificate Number 7 Jatiwaringin was legally flawed because the basis of the Deed of Sale and Purchase which was the basis for the certificate being issued had a different area, while the area of land

owned by the Plaintiff was in accordance with the certificate he owned and on this matter in the District Court Decision the Plaintiff won in this case.

The Defendant PT. Antilope Madju, who did not accept, filed an appeal through the Bandung High Court based on Case Number 323/PDT/2015/PT.BDG, the results of which confirmed the District Court's decision. Based on the background of the problem above, the authors conducted research on the "Disputes Due to Incompatibility with the Land Registration Process" (Case Study of High Court Decision No. 323/PDT/2015/PT.BDG)

The purpose of this study is to understand (1) the High Court Decision Number 323/PDT/2015/PT.BDG when viewed from the aspect of National Land Law and (2) legal certainty for parties who hold proof of ownership of land rights (certificate) as well as the accountability of government institutions that issue land certificates that turn out to be problematic.

METHOD

This research uses the Normative Juridical Method (Ningrum et al., 2022). This research approach is qualitative descriptive and the data collection technique used is secondary data in the form of literature study data and related laws and regulations (Djaja & Ramadhan, 2023).

2. DISCUSSION

DISPUTES CAUSED BY INCOMPATIBILITY WITH THE LAND REGISTRATION PROCESS (Case Study of High Court Decision No. 323/PDT/2015/PT.BDG)

Land Registration

Land registration in article 19 paragraph (2) letter C UUPA is the provision of a certificate of proof of title which acts as a strong means of proof. The physical data and juridical data contained must be in accordance with the data in the measurement letter and land rights book in question. As long as there is no other evidence that does not confirm the data, the existing information must be considered correct so that it can be said that the certificate is a proof of rights and a strong means of proof regarding the rights, subject matter and land. In Article 19 it is also explained that "land registration is the government's task which is carried out in order to guarantee legal certainty in the land sector in addition to

determining the costs of the land registration process so that poor people can be freed from the burden of costs".

Apart from providing legal certainty, in general the aim of land registration is in article 3 of Government Regulation number 24 of 1997 concerning Land Registration, namely:

"1. To provide legal certainty and protection to holders of rights to a plot of land, apartment units and other registered rights so that they can easily prove themselves as holders of the rights in question;

To provide information to interested parties, including the Government, so that they can easily obtain the data needed to carry out legal actions regarding registered land parcels and apartment units;

To maintain orderly land administration".

The existence of this land registration makes it easier for the public or someone to find out information about a plot of land, such as what rights they control, how big it is, where it is located, whether it is under mortgage or not.

This juridical data reflects the principle of publicity and is contained in a public list so that it can be known by anyone who wants to know. With this data, anyone no longer needs to come directly to the land location because all this data can easily be obtained at the local district and/or city land office. (Effendie, 1983)

The land registration process is usually carried out in 2 (two) systems, namely the deed registration system and the rights registration system. Deed registration is a deed registered by a land registration official. This land registration is passive because officials do not test the accuracy of the data contained in the deed so that the deed is very vulnerable to legal defects if there are problems or disputes in the future.

The Rights Registration System is the registration of rights and subsequent changes to which a list of entries is provided in the form of a land book. This land book is kept at the Land Office. In this system, the deed-making official actively registers the rights to the deed and then a certificate is issued which is a copy of the registration in the land book (Murni et al., 2022).

Land registration will aim at issuing certificates as a form of publication, the nature of the publication can be divided

into several parts, namely:

Positive Publication System

This publication system uses rights registration so that registration or data collection must be carried out in land books as a form of presentation and storage of juridical data and title certificates as proof of rights. (Harsono, 1999)

What is stated in the land book is absolute and the certificate issued is an absolute means of proof so that third parties who have evidence and have good intentions get absolute protection even if the information contained therein is not true. If a third party truly feels that they have suffered a loss as a result of the land registration, they must receive compensation in another form. The characteristics of this system are:

This system guarantees perfectly that the name listed in the land book cannot be disputed, even if it turns out that the name is not the real owner, in other words this system gives absolute trust to the land book;

Land officials in this case are active in investigating whether the land rights to be transferred are registered or not, investigating the identity of the parties, their authority and the formal requirements have been fulfilled or not;

The rights relationship between the name listed in the land book and the previous owner is terminated from the moment the rights are registered. (Effendie, 1983)

This system has advantages and disadvantages, the advantages of which are:

The certainty of the land book encourages people to register their rights;

Land officials are active in their role carrying out their duties;

The mechanism of work procedures and certificate issuance can be understood by lay people.

While the disadvantages of this system are:

The active role of land officials results in the need for a larger number of officers and a longer time in the registration process;

The owner who is actually entitled to the land will lose his rights due to the certainty of the land book;

The resolution of problems and disputes that should be under the authority of the courts is placed under administrative authority. (Abdurrahman, 1983)

Negative Publication System

This system explains that evidence is strong evidence because the information in it has legal force and must be accepted as true information as long as there is no other evidence that proves otherwise. The guarantee of protection in this publication system is not absolute like the positive publication system because there is always the possibility of a lawsuit from another party who can prove that he is the actual rights holder. The characteristics of this system are:

Registration of land rights does not guarantee that the registered name cannot be disputed if it is later discovered that it is not the actual owner because the rights obtained were from the previous rights giver;

Land officials are passive, that is, they are not obliged to investigate the correctness of the data.

The advantages of this negative publication system are (Wafa, 2017):

Protection for registered rights holders;

The registration process is carried out more quickly because land officials are not obliged to check the data and investigate the data.

The disadvantages of this system are:

The passive role of land officials will lead to land overlapping because no one investigates in depth and with certainty the list and basis of ownership rights, such as the name of the owner and the physical condition of the land;

The mechanism of the certificate issuance process is so complicated that it is not well understood by the general public;

Land books and all registration requirements do not provide legal certainty because they can be defeated by other evidence.

Publication System according to UUPA

The publication system in the UUPA is a negative publication system which contains "positive elements because it produces a letter of proof of rights which acts as strong evidence" in accordance with article 19 paragraph (2) letter c, article 32

paragraph (2), and article 38 of the UUPA. Strong evidence means that everything stated in it has legal force, but if another party proves otherwise, then the evidence has no legal force, so it can be said that the evidence is strong but not absolute.

Judge's Legal Considerations in Decision Number 323/PDT/2015/PT.BDG.

In this case, the discussion or problem is that the original Plaintiff, Sutikno Citro, had purchased the land from Boas' brother based on Sale and Purchase Deed Number 4504/JB/HTS/HJ/I/X1/1993. When Sutikno planned to build a house on his land, it turned out that the land had been affected by public facilities in the form of a road which had the status of Right to Use Certificate Number 7/Jatiwaringin in the name of the Bekasi City Government.

Sutikno has filed a lawsuit with the Bandung State Administrative Court with case registration Number 102/G/2002/PTUN-BDG being canceled and the Defendant PT. Antilope Madju also paying the basic costs of the case. PT. Antilope, which did not accept, appealed to the High State Administrative Court with case registration Number 196/B/2003/PT.TUN.JKT, the results of which confirmed the decision of the Bandung Administrative Court.

Sutikno has also submitted a request for execution of the Decision of the Jakarta High Administrative Court in case registration Number 196/B/2003/PT.TUN.JKT. Based on decision Number 16/PEN.EKS/2008/PTUN.BDG and in fact the execution was carried out on August 13 2008. Even though there has been an execution process, in reality the land is still being used as a public facility, namely a public road for vehicles and the entrance to the Darul Ikham Grand Mosque, so Sutikno Citro feels that this action is against the law and has caused material and physical losses.

As a result of this, Sutikno Citro filed a lawsuit at the Bekasi District Court with case registration Number 170/PDT.G/2014/PN.BKS. Sutikno won the decision, and PT. Antilope Madju together with the Bekasi City Government filed an appeal against the decision with case registration number. 323/PDT/2015/PT.BDG but the results of the appeal confirmed the decision of the Bekasi District Court Number 170/PDT.G/2014/PN.BKS.

The panel of judges in this case

considered various things, including:

First, the main problem is the 254 M² land located on Jalan Cendrawasih Number 162, Antilope RT Housing. 09/RW. 07 Jatiwaringin Subdistrict which is now Jati Cempaka, Pondok Gede District, Bekasi City and to prove the arguments of the lawsuit, the Plaintiff's Attorney has submitted evidence of letters P-1 to P-13 and 3 (three) witnesses. Meanwhile, Defendant I, to prove the argument he denies, submitted evidence T.I-1 to T.I-6 and Defendant IV submitted evidence from letters T.IV-1 to T.IV-2.

Second, that the Plaintiff purchased land from H. Boas, H. Musa H. Djali, Suryani H. Djali in 1993 which was Customary Land Number C/Kohir.611/685 parcel Number 19 covering an area of 254 254 M² based on Deed of Sale and Purchase Number 4504/JB/HTS/HJ/I/XI/1993 before the Head of Pondok Gede Subdistrict based on evidence P-1 and apart from the land in the case, the Plaintiff purchased land bordering the land in case based on evidence P-2 and P-3.

Third, the witnesses presented by the plaintiff, namely H. Emat, H. Roup, and Soemaryo Matohar, explained that the plaintiff originally lived in Halim. After retiring from his duties, he just built a house in the Antilope area which he bought and had a certificate, but the land had been made into a road by PT Antilope at the request of the residents because they did not know that the land had been purchased by the Plaintiff. After a local inspection of the case land by the panel of judges, it was found that the land had become an asphalt road leading to the Antilope housing complex and part of the case land had become a mosque courtyard according to photo evidence P-13 submitted by the Plaintiff.

Fourth, based on the Defendant's answer and evidence from the Defendant, the case land is included in the Right to Use Certificate Number 7/Jatiwaringin which is combined in 5 (five) deeds, namely:

Deed no. 30 dated 09-08-1981 covering an area of 2,740 M²;

Deed no. 20 dated 09-08-1981 covering an area of 1,360 M²;

Deed no. 19 dated 09-08-1981 covering an area of 2,240 M²;

Deed no. 297 dated 27-11-1982 covering an area of 2,020 M²;

Deed no. 18 dated 09-08-1981 covering

an area of 1,485 M².

Based on the evidence belonging to Defendant I (T.1-1, T.1-2, T.1-3, T.1-4, and T.1-5), the total area of the Right to Use Certificate Number 7/Jatiwaringin is 9,388 M². The land is in the name of the Bekasi Level II Regency Government (currently the Bekasi City Command) as a Social Facilities and Public Facilities, of course the maintenance and supervision is carried out by Jati Cempaka Village and Pondok Gede District, Bekasi City. This is also a consideration of the role of Jati Cempaka Village as Defendant II and Pondok Gede District, Bekasi City as Defendant III based on Defendant I's Exception.

Fifth, Defendant I stated that the land in the case in question was purchased from the heirs of H. Murdjali bin H. Nawin, namely in the form of customary freehold land Girik C. 611 Parsil 18 covering an area of 2,020 M², while the land in the case purchased by the Plaintiff was in accordance with Deed of Sale and Purchase Number 4504 /JB/HTS/HJ/I/XI/1993 dated 23 November 1993 is Customary Ownership Rights Number C. Kohir.611/685 Plot Number 19 block Kores covering an area of 154 M² so that the case land referred to by Defendant I is different from the Plaintiff's land considering the number different parcels.

Sixth, Certificate of Right to Use Number 7/Jatiwaringin before a lawsuit was filed at the Bandung District Administrative Court with Decision Number: 102/G/2002/PTUN-BDG dated April 3 2002 with the decision "Declaring void Certificate of Right to Use 7/ Jatiwaringin dated 27 April 1994, situation drawing No. 6543/1988 dated 7 March 1994, previously derived from situation drawing No. 1684/80 in the name of Bekasi Level II Regency Government covering an area of 9,388 M² with the consideration that the land in question is located on the same stretch as the land of the Right to Use Certificate 7/Jatiwaringin so that the Right to Use Certificate is legally defective because it does not conform to the juridical and physical data." (Exhibit P-4). Next, through the decision appeal level. This was confirmed in the Jakarta High Court Decision Number 196/B/2003PT.TUN-JKT dated 7 June 2004 (Exhibit P-5) and thereafter no appeal was made to the Supreme Court so that the decision had permanent legal force.

Seventh, based on evidence from both parties that the Plaintiff had purchased the

land in the case from H. Boas Cs in 1993 which was done openly and in cash. In clear terms, this is carried out in the presence of the General Officer of the District Head, Land Deed Officials (PPAT) Head of Pondok Gede District and who is more familiar with the object of the case in his jurisdiction and the land register of the case. Then what is meant by cash is that payment is made immediately as stated in the Sale and Purchase Deed Number 4504/JB/HTS/HJ/I/XI/1993 dated 23 November 1993 so that the sale and purchase of the land in the case carried out by the Plaintiff must be declared valid. Because the sale and purchase of land based on the Sale and Purchase Deed Number 4504/JB/HTS/HJ/I/XI/1993 was declared valid, according to the panel of judges, the seller, namely H. Boas Cs, did not need to be submitted as a party to the case as well as the Bekasi City Land Agency because previously based on the State Administrative Decision submitted by the Plaintiff.

Eighth, because the Sale and Purchase Deed Number 4504/JB/HTS/HJ/I/XI/1993 has been declared valid, the Plaintiff is the legal owner of the land in the case located on Jalan Cendrawasih Number 162, Housing Antilope RT. 09 RW. 07, Jati Cempaka Village, Pondok Gede District which originates from the Customary Ownership Rights of C. Kohir.611/685 Parsil No. 19.

Ninth, the case land is declared legally owned by the Plaintiff, so Defendant I's act of building public facilities and social facilities on the case land without the plaintiff's permission has been declared an unlawful act. then the Defendant was sentenced to hand over voluntarily without any burden and as before to the Plaintiff the land in the case based on the Sale and Purchase Deed Number 4504/JB/HTS/HJ/I/XI/1993 which was purchased from Brother Boas Cs. Recorded from C. Kohir.611/685 Persil No. 19 with limits:

North: Footpath

East: Environmental Road

South side: Mosque

East side: Sutikno

Tenth, in the Plaintiff's lawsuit the Defendants were sentenced to pay for the Material and Immaterial losses suffered by the Plaintiff because they were unable to control the land in the case, in this lawsuit the Plaintiff was unable to actually prove these losses so that the Material and Immaterial lawsuit was groundless and

rejected, Likewise with the Plaintiff's claim that the Defendants be sentenced to pay forced money (Dwangsom), because this is unreasonable it is rejected.

From several considerations of the panel of judges, in the author's view, the emphasis is more on the facts revealed in the trial, this refers to the philosophy of civil law where the evidence and testimony of witnesses presented in the trial will be taken into consideration by the judge in deciding the case.

In the judge's consideration, the land owned by the Plaintiff was obtained through a valid sale and purchase process based on Sale and Purchase Deed Number 4504/JB/HTS/HJ/I/XI/1993 in 1993 from H. Boas Cs. The judge saw that the sale and purchase process carried out by the Plaintiff was carried out openly and in cash because the sale and purchase process was carried out in the presence of the Land Deed Officials (PPAT) of Pondok Gede District and payment was made immediately, Sale and Purchase Deed Number 4504/JB/HTS/HJ/I/ XI/1993 stated that it was true that the land was paid for by the Plaintiff immediately based on the judge's review.

Apart from this, the land in the case was indeed used and used intentionally by the Defendant as a means of public facilities and social facilities for roads because the position of the land is close to public facilities in the form of a mosque and a public road in front of the mosque so it is considered that the land is still part of a public road.

Looking at the evidence attached by the Defendant in the form of Deed Number 297 dated 27 November 1982 covering an area of 2,020 M² based on the Customary Ownership Rights of Girik C.611 Persil 18 which is also included in the Certificate of Use Rights Number 7/Jatiwaringin which is different from the Customary Ownership Rights owned by the Plaintiff based on the Deed of Sale and Purchase Number 4504/JB/HTS/HJ/I/XI/1993 covering an area of 254 M² Number C. Kohir.611/685 Plot Number 19. Based on the parcel numbers mentioned as having different parcel numbers and different land areas, the author sees the judge's consideration that the construction of Public Facilities and Social Facilities in the form of roads has exceeded the land ownership limit of the Right to Use Certificate Number 7/ Jatiwaringin.

Before the Civil Suit was filed, the Plaintiff had also filed a lawsuit with the

State Administrative Court regarding this case and based on the PTUN decision the Right to Use Certificate Number 7/ Jatiwaringin had been canceled and the process of executing the cancellation of the certificate had been carried out by the Bekasi City National Land Agency based on Determination Number 16/PEN. EKS/2008/ PTUN.BDG. The process at the PTUN reached the appeal process and the Plaintiff also won. The plaintiff again filed a lawsuit through civil law because even though it had been decided through the Administrative Court, the physical condition of the land in the case had not returned to its original state, so the plaintiff felt that his land, which had been physically controlled, could not regain control of the land because it had been used as a public road.

However, in this case the Bekasi District Court could not grant the plaintiff's claim for compensation because it could not be proven. The District Court's decision was then appealed by the Defendant, the result of which was to uphold the District Court's decision so that the Defendant was not won again in the High Court Decision.

4. CONCLUSION

Based on the results of the discussion described above, the author can draw conclusions that can be drawn in this research is illegal control of land in the sense of using someone else's land is an incorrect action, in the case of the establishment of social facilities and public facilities it is necessary to look at the boundaries of the land to be used, land used for public facilities belongs to the government so the government should be able to synergize with the local land office regarding the land assets that will be used so as not to give rise to cases or disputes in the future, individual land owners will be the party who suffers losses because it will be difficult to determine the basis for compensation for their land which is controlled for public purposes because if the land owner restores the condition of his land unilaterally it will create new conflicts, namely with the surrounding community.

REFERENCES

- Abdurrahman. (1983). *Beberapa Aspek Hukum Agraria*. Alumni.
- Adrian. (2009). *Peralihan Hak Atas Tanah dan Pendaftaranannya*. Sinar Grafika.
- Djaja, B., & Ramadhan, F. F. (2023). Land Rights in the Basement. *International Journal of Application on Social Science*

- and Humanities*, 1(1), 1250–1258. <https://doi.org/10.24912/ijassh.v1i1.25803>
- Dotulung, M., T., P., . (2018). Pembatalan Sertipikat Hak Atas Tanah Akibat Ccat Hukum Administrasi. *Lex Privatum*.
- Effendie, B. (1983). *Pendaftaran Tanah di Indonesia dan Peraturan-Peraturan Pelaksanaannya*. Alurni.
- Harsono, B. (1999). *Hukum Agraria Indonesia Sejarah Pembentukan Undang-Undang Pokok Agraria Isi dan Pelaksanaannya* (Cet. 9). Djambatan.
- Murni, C. S., Kelen, B. B., & Sulaiman, S. (2022). THE LEGAL CERTAINTY OF LAND OWNERSHIP RIGHT IN REGISTRATION'S CONTEXT. *International Journal of Law Reconstruction*, 6(1), 13. <https://doi.org/10.26532/ijlr.v6i1.16422>
- Ningrum, A. S., Hafidz, J., Widayati, W., & Listyawati, P. R. (2022). The Legal Protection for Buyer in Deed of Selling By Using A Substitute Certificate. *Sultan Agung Notary Law Review*, 4(1), 36. <https://doi.org/10.30659/sanlar.4.1.36-47>
- Nugroho, S. S., SH, M., Utama, I. W. K. J., & SH, M. K. (2022). *Pokok-Pokok Hukum Agraria Indonesia*. Penerbit Lakeisha.
- Parlindungan, A. P. (1999). *Pendaftaran Tanah Indonesia*. Mandar Maju.
- Pelupessy, E.-. (2024). Implementation Of Mining Management And Enterprise Policies Based On The Principles Of Social Justice And Community Welfare. *Pena Justisia: Media Komunikasi Dan Kajian Hukum*, 22(3), 694. <https://doi.org/10.31941/pj.v22i3.3950>
- Putra, F. M. K. (2015). PEMBATALAN SERTIPIKAT HAK ATAS TANAH KARENA CACAT ADMINISTRATIF SERTA IMPLIKASINYA APABILA HAK ATAS TANAH SEDANG DIJAMINKAN. *Perspektif*, 20(2), 101. <https://doi.org/10.30742/perspektif.v20i2.152>
- Suwardi. (2023). Mass Certification Policy for Community Land Objects. *International Journal of Scientific Multidisciplinary Research*, 1(10), 1227–1238. <https://doi.org/10.55927/ijsmr.v1i10.6492>
- UTAMA, I. W. K. J., SUJANA, I. N., WESNA, P. A. S., & RIBEIRO, L. (2022). Implications Of Control Of Coastal Lands By Foreigners In The Tourism Business. *Protection: Journal Of Land And Environmental Law*, 1(2), 78–85. <https://doi.org/10.38142/pjlel.v1i2.472>
- Wafa, M. A. (2017). Problematic Issuance of Land Rights Certificate. *JURNAL CITA HUKUM*, 5(2). <https://doi.org/10.15408/jch.v5i2.7089>
- Widjaja, M. (2014). *Hak-Hak Atas Tanah*. Kencana Prenada Media Group.