

LEGAL RESPONSE AGAINST FORGERY OF AUTHENTIC DEEDS USED AS THE BASIS FOR LAND REGISTRATION

Indah Permata Sari Br Sembiring, Rahmat Ramadhani

Email: indahpermatasbr@gmail.com

Universitas Muhammadiyah Sumatera Utara

ABSTRACT

Land holds a crucial position in the lives of Indonesians due to its high economic, social, and cultural value. To ensure legal certainty and protection of land ownership, the state implements a land registration system as stipulated in Law Number 5 of 1960 concerning Basic Agrarian Principles. In practice, the transfer of land rights, particularly through sale and purchase, must be evidenced by an authentic deed drawn up by a Land Deed Official (PPAT) and used as the basis for issuing a land title certificate. However, legal issues often arise in the form of forgery of authentic deeds used as the basis for land registration, resulting in the issuance of legally flawed land title certificates and causing harm to other parties. This study aims to analyze the legal standing of authentic deeds in the Indonesian land registration system, examine the evidentiary strength and forms of legal protection for parties harmed by the issuance of land title certificates based on forged sale and purchase deeds, and outline the legal remedies available to the aggrieved parties. The research method used is normative legal research with a statutory and conceptual approach, supported by primary, secondary, and tertiary legal materials. The research results show that authentic deeds have perfect evidentiary force as long as they are made in accordance with applicable legal provisions. However, if the deed is proven to be forged, it loses its evidentiary force and the land title certificate issued based on it can be revoked. Aggrieved parties can pursue legal remedies through civil, criminal, and land administration channels as a form of legal protection. Therefore, strengthening the principle of prudence and supervision of authorized officials is necessary to prevent deed forgery and ensure legal certainty in land registration.

Keywords: Authentic Deed, Land Registration, Ownership Certificate, Deed Forgery, Legal Protection

A. Introduction

Indonesia is known as an archipelagic country rich in natural resources, one of which is land which has high economic, social, and cultural value. Land in Indonesia is not only a valuable asset for every individual, but also has an important role in national development. In

the provisions of Article 33 paragraph (3) of the 1945 Constitution it states "Land and water and the natural resources contained therein are controlled by the state and used for the greatest prosperity of the people." Therefore, the state guarantees legal certainty regarding land ownership through a land administration system regulated in laws and regulations. According to Rahmat Ramadhani:

Land is the surface of the earth that humans desperately need to sustain life. The growing human population, which is disproportionate to the land area, requires the state to play a role in creating social order within society through written, coercive regulations. The state, as the authority that controls and owns land, is responsible for this.¹

Based on Law Number 5 of 1960 concerning Basic Agrarian Regulations or the Basic Agrarian Law (UUPA). One of the objectives of the Basic Agrarian Law (UUPA) is to provide legal certainty regarding land rights held by the community. This is expressly regulated in Article 19 paragraph (1) of the UUPA, which states that to guarantee legal certainty, the Government shall carry out land registration throughout the territory of the Republic of Indonesia according to the provisions regulated by Government Regulations.²

Land ownership rights are hereditary, the strongest, and most complete rights that a person can have over land as regulated in Article 20 paragraph (1) of Law Number 5 of 1960 concerning Basic Agrarian Regulations (UUPA). Ownership rights provide the holder with the broadest authority to use and utilize land as long as it does not conflict with statutory provisions, the public interest, or the rights of other parties. Regulations regarding land ownership rights are intended to provide legal certainty and protection for rights holders.

Land ownership rights can be transferred and assigned, even if they are hereditary. The transfer of land ownership rights occurs due to a legal event, such as the death of the rights holder. Therefore, these rights are legally transferred to their heirs, provided they meet the requirements for ownership rights as stipulated in the UUPA. This transfer of rights due to inheritance occurs automatically based on applicable legal provisions.

The transfer or assignment of land ownership rights occurs due to a legal act carried out intentionally by the rights holder to another party. Transfer of land ownership rights can be carried out in various ways, including sale and purchase, exchange, donation, and investment into a company. Sale and purchase is the most common form of land ownership transfer in

¹Rahmat Ramadhani (2022). "Legal Status of Sales and Purchase Agreements (PPJB) in Land Rights Transfer Registration Activities", SOSEK: Journal of Social and Economics, Vol. 2, No. 1, pages 45-50.

²Boedi Harsono, (2003). Indonesian Agrarian Law, Collection of Land Law Regulations, Jakarta: Djambatan.

practice. Land sales and purchases must be conducted transparently and in cash and evidenced by a deed drawn up by a Land Deed Official (PPAT), which is then used as the basis for registering the transfer of rights at the land office to ensure legal certainty for the party acquiring the land rights.³

Ownership rights have special privileges compared to other land rights, so people tend to carry out legal acts in the form of buying and selling an object with ownership rights as the basis for their rights. According to the provisions of Article 37 paragraph (1) of Government Regulation Number 24 of 1997 concerning Land Registration, it is determined that the transfer of land rights and ownership rights to apartment units through buying and selling, exchange, gifts, income in companies and other legal acts of transferring rights, except auctions, can only be registered if proven by a deed made by an authorized PPAT according to the provisions of applicable laws and regulations.

Under these regulations, the transfer of ownership can only be carried out if a deed of sale and purchase is prepared before a Land Office (PPAT). In practice, PPATs are assisted by their staff to handle the deed preparation process. However, in carrying out their duties, PPAT staff often falsify the terms of the deed. The falsified deed is used as the basis for a land title application. Therefore, issuing a land title certificate based on a forged deed can be detrimental to other parties.⁴

An authentic deed is a deed drawn up before a public official appointed by law and possessing the authority and obligations stipulated in the law. However, land sale and purchase disputes continue to occur. Among various land issues, these disputes are generally caused by inconsistencies in legal data, administrative negligence, bad faith on the part of the parties, and failure to properly register the transfer of rights.⁵

Legal certainty in land registration implies the issuance of a certificate of land title by the National Land Agency (BPN), the land administration agency. This certificate is issued to the entitled party and can be relied upon by the rights holder as strong evidence of ownership

³Urip Santoso, (2012), *Agrarian Law: A Comprehensive Study*, Jakarta: Kencana Prenadamedia Group, pages 93-94

⁴Riska Sri Agustin, (2021), "Criminal Liability for Forgery of Authentic Deeds Used as the Basis for Submitting Land Ownership Certificates", *Lex Journal: Legal & Justice Studies*, Vol. 4 No. 2.

⁵Husnul Arifin, Listyowati Sumanto, (2024), "Responsibility of Ppat for Authentic Deeds Case Study of Decision Number: 250/Pid.B/2022/Pn.Jkt.Brt. Between Nirina Zubir and Erwin Ridwan as Ppat", *Critical Journal of Legal Studies*, Vol, 9 No, 5 pages 69-83

and control of the land in question. It also serves to prevent disputes and provide legal protection for the rights holder.⁶

Forgery is regulated in Chapter XII of Book II of the Criminal Code, which contains provisions regarding crimes against public trust. These provisions emphasize that acts that fall under the category of forgery are principally related to writing or letters. One form of forgery that frequently occurs is the forgery of letters as regulated in Articles 263 to 276 of the Criminal Code. In law enforcement practice, the most frequently encountered criminal acts of forgery are related to Articles 263, 264, and 266 of the Criminal Code, particularly those concerning the forgery of authentic documents, the use of forged documents, and the provision of false information in authentic deeds.

According to (QS. Al-Baqarah: 188) And do not eat up one another's property by wrongdoing, nor bring it to the judge so that you may eat up some of the property of others wrongfully, while you know.

In the Hadith it is said "It is not lawful to take the property of a Muslim except with his consent"" (HR. Ad-Daraquthni)"

An authentic deed has high evidentiary power because it can provide perfect proof based on the facts contained within it. The contents of an authentic deed and its existence as a physical document provide a strong foundation to support the validity and certainty of a legal act. Authentic deeds are regulated by law as a reliable means of proof.⁷

Based on the explanation of the phenomenon and legal urgency related to the forgery of authentic deeds used as the basis for submitting land ownership certificates above, it was found that the forgery of authentic deeds submitted as the basis for submitting land ownership certificates can give rise to various legal problems that can be detrimental to various parties. Therefore, this study will examine and explain "Legal Efforts Against Forgery of Authentic Deeds Used as the Basis for Land Registration".

B. Research Methods

A study cannot be called research if it does not have a research method.⁸ Research methods are one of the factors of a problem that will be discussed. The study was conducted

⁶Rahmat Ramadhani (2021). "Land Registration as a Step to Obtain Legal Certainty Regarding Land Rights." SOSEK: Journal of Social and Economic Affairs. Vol. 2, Issue 1, pages 31-41

⁷Wiharjo, W., & Isharyanto, JE (2022), "Legal Consequences of Land Sale and Purchase Deeds Made by Ppat with False Identities of the Applicants", Notary Law Research, Vol. 3, No. 2, page 55.

⁸ Hanifah, I., Hariyanto, H., Ginting, L., Koto, I., & Syafriana, R. (2026). Legal Protection of Indonesia's Fisheries from Foreign Investment: A Social-State Approach. *Jurnal IUS Kajian Hukum dan Keadilan*, 14(1).

using secondary data which was analyzed qualitatively using the Desk Research Method. The literature materials used in writing this research are several references originating from research results, studies, and reviews of several writings which are then summarized into a scientific paper.⁹

C. Discussion

1. Legal Status of Authentic Deeds in Land Registration in Indonesia

An authentic deed is written evidence that has perfect evidentiary force, as it is drawn up before an authorized public official and drafted in accordance with applicable legal provisions. In the context of Indonesian civil law, an authentic deed occupies the highest position in the evidentiary system, where every statement contained therein is considered true and binding on all interested parties, including judges. This creates legal certainty for the parties involved in legal actions, reduces the potential for future disputes, and provides clear legal protection.

In judicial practice, authentic deeds are often used as primary evidence. Any party who denies the contents of an authentic deed is burdened with proving the existence of formal or material defects. This demonstrates the powerful role of authentic deeds in resolving civil disputes. For example, in land disputes, a deed of sale and purchase prepared by a Land Deed Official (PPAT) is strong evidence that must be accepted by the court, unless there is valid evidence to the contrary.

Referring to Article 1868 of the Civil Code (KUHPerdara), an authentic deed is a deed drawn up in accordance with the form prescribed by law. The authenticity of a deed is determined not only by its contents but also by the authority of the official who drafted it. If the formal requirements are not met, the deed loses its authenticity and has only the force of a private deed. This emphasizes the important role of public officials in ensuring that deeds are drawn up in accordance with applicable legal procedures.

In the context of land affairs, a Land Deed Official (PPAT) is an official authorized to issue authentic deeds related to land rights. Deeds issued by a PPAT, such as deeds of sale and purchase and gifts, have complete evidentiary force and serve as the legal basis for recording data changes at the Land Office. Without a PPAT deed, changes to land rights cannot be recorded and have no legal consequences for third parties. This demonstrates that authentic deeds serve not only as evidence but also as an important administrative instrument

⁹ Simatupang, R. S. A., Hanifah, I., & Mansar, A. (2025). The Concept of Restitution as Legal Accountability in the Crime of Human Trafficking. *Pena Justisia: Media Komunikasi dan Kajian Hukum*, 24(1), 3554-3462.

in the land registration system.

The evidentiary power of an authentic deed encompasses external, formal, and material aspects. External power relates to the deed's ability to prove itself as a valid deed. Formal power relates to the truth of the matters stated and recorded by the official issuing the deed, while material power relates to the truth of the deed's contents regarding the legal acts performed. In judicial practice, judges are bound by the evidentiary power of an authentic deed as long as there is no decision declaring the deed invalid.

The legal implications of using authentic deeds in land registration are significant. An authentic deed serves as a legal instrument that determines the validity of legal acts concerning land rights. Without an authentic deed, legal acts cannot be processed within the land registration system, thus depriving them of legal recognition and protection from the state. This underscores the importance of authentic deeds in providing legal certainty and protection for land rights holders.

In practice, the absence or defects of an authentic deed can result in the failure to register a legal act on land. An authentic deed is a formal and imperative requirement; therefore, its absence prevents the legal act from fulfilling the requirements for registration. Defects in the deed, whether formal or material, can result in the loss of authenticity and the inability to serve as a legal basis for land registration. This demonstrates that authentic deeds and land registration are a single entity that determines legal certainty and legal protection for land rights holders in Indonesia.

Thus, authentic deeds play a crucial role in ensuring legal certainty, order, and legal protection within the Indonesian land registration system. The existence of a valid, authentic deed that complies with legal provisions is a determining factor in ensuring legal certainty for land rights holders. Therefore, fulfilling the formal requirements for creating an authentic deed must be a primary concern in any legal action related to land rights.

2. The Power of Proof and Legal Protection for Parties Who Are Injured by the Issuance of a Certificate of Ownership in a Registration Made Based on a Fake Sale and Purchase Deed

Legal protection for parties harmed by the issuance of a Certificate of Ownership based on a forged Deed of Sale and Purchase can be achieved through three main channels: civil, criminal, and land administration. In the civil context, the aggrieved party can file a lawsuit to annul the deed and certificate with the court. This is based on Article 1338 of the Civil Code (KUHPerdara), which stipulates that a legally flawed deed that violates the principle of legal certainty can be annulled. For example, if there is strong evidence that the deed of sale and

purchase used to issue the certificate is forged, the court has the authority to declare the deed and certificate null and void and order the restoration of the rights of the aggrieved party.

Furthermore, land administration mechanisms also provide legal protection. Aggrieved parties can submit a request for certificate cancellation to the National Land Agency (BPN) by providing evidence that the deed used is fraudulent. The BPN has the authority to assess the validity of documents and cancel certificates found to be administratively flawed. This is crucial to maintaining legal certainty in the land registration system and preventing the issuance of duplicate certificates, which often harms well-intentioned parties.

From a criminal perspective, legal protection can also be achieved by reporting deed forgery to law enforcement officials. The crime of forgery of official documents is regulated in Articles 263 and 264 of the Criminal Code, which impose sanctions on perpetrators of forgery. Criminal law enforcement aims not only to restore the rights of injured parties but also as a preventative measure to prevent document misuse in the land registration system. Thus, the combination of civil, administrative, and criminal proceedings creates a comprehensive effort to protect parties in good faith and uphold legal certainty.

Relevant institutions, such as Land Deed Officials (PPAT), the National Land Agency (BPN), and the judiciary, play a crucial role in providing legal protection to injured parties. PPATs are responsible for creating authentic deeds with full evidentiary force. In carrying out their duties, PPATs must ensure that each deed they create meets the formal and material requirements in accordance with statutory regulations. If PPATs fail to verify documents, this can have serious consequences, including the issuance of legally flawed certificates.

The National Land Agency (BPN) acts as the institution responsible for managing land registration and issuing land title certificates. Its duties include administrative review of land registration application files, including checking the validity of deeds and data conformity. The BPN is expected to apply the principle of prudence in every registration process to prevent errors that could harm well-intentioned parties. In some cases, such as the one in Serang, Banten, where deeds were forged by unscrupulous officials, the BPN must act decisively to revoke certificates issued based on the forged deeds.

The judiciary serves as the final institution in resolving land disputes. Courts have the authority to decide cases based on valid evidence, including deeds drawn up by Land Deed Officials (PPAT) and notaries. In this context, court decisions are a crucial instrument for restoring victims' rights and deterring perpetrators of fraud. Synergy between the National Land Agency (BPN), Land Deed Officials (PPAT), and the judiciary is crucial for creating an

effective legal system, where each institution supports each other in protecting the rights of the injured party.

Land Deed Officials (PPAT) have a significant responsibility in maintaining the validity and reliability of the land registration system. PPATs are not only tasked with recording the wishes of the parties but also with examining and verifying the data and documents that form the basis for the deed. This obligation includes verifying the identities of the parties, verifying the validity of the land certificate, and ensuring that legal acts are carried out in their presence and witnessed by the necessary witnesses.

In practice, problems often arise due to negligence on the part of Land Deed Officials (PPATs), such as failing to thoroughly check the identities of the parties or verifying the validity of the certificate. If a deed of sale and purchase is drawn up based on inaccurate information, it can lose its legal force and potentially be declared null and void. Therefore, PPATs must act with caution and professionalism to prevent future disputes.

The National Land Agency (BPN), as the institution responsible for managing land registration, is also responsible for ensuring that every certificate issued is based on a legitimate administrative process and complies with statutory provisions. BPN's obligations include careful administrative review of registration application files to prevent errors that could harm well-intentioned parties. In this context, the BPN's application of the precautionary principle is crucial to maintaining the integrity of the land registration system.

The legal responsibilities of Land Deed Officials (PPAT) and the National Land Agency (BPN) include civil, criminal, and administrative liability. If they are negligent or intentionally commit errors, they can be held accountable in accordance with applicable regulations. Administrative sanctions can be imposed on Land Deed Officials who fail to carry out their duties professionally, while criminal sanctions can be imposed if there is an element of forgery or fraud. Therefore, effective oversight of the performance of Land Deed Officials (PPAT) and the National Land Agency (BPN) is crucial to achieving legal certainty and justice in the land sector.

Legal protection for parties harmed by the issuance of a Land Ownership Certificate based on a forged Deed of Sale and Purchase is crucial for maintaining legal certainty and the integrity of Indonesia's land registration system. Through civil, administrative, and criminal proceedings, aggrieved parties have various options to enforce their rights and obtain justice. The role of relevant institutions, such as the Land Deed Official (PPAT) and the National Land Agency (BPN), is crucial in ensuring that each registration process is carried out correctly and in accordance with applicable law. Synergy between these institutions, along with strict

oversight of their performance, will create a more transparent and equitable land system for all. This will enable efforts to eradicate the practice of deed forgery and maintain public trust in Indonesia's land legal system.

3. Legal Actions That Can Be Taken by Parties Who Have Been Injured in Case of Forgery of Authentic Deeds as the Basis for Land Registration

Land holds high strategic value for individuals and the state, serving as an economic, social, and religious asset. However, this high value makes it vulnerable to criminal acts such as document forgery and authentic deeds. In the context of Indonesian land law, authentic deeds prepared by authorized officials, such as notaries or land deed officials (PPAT), hold crucial evidentiary power. When authentic deeds are forged, legal certainty over land rights can be lost, and the aggrieved party must seek legal remedies to restore their rights.

Forgery of authentic deeds can occur through various methods, including the creation of fake documents, unauthorized data alteration, or collusion between officials and certain parties. The impact of these actions is significant, as land that should be owned by certain parties can be transferred illegally, giving rise to legal disputes and material losses. For example, in the case of uncertified land grants, this problem becomes more complex because the land lacks strong legal recognition, making it vulnerable to conflict between the grantor and recipient, or third parties claiming ownership rights.

Land Deed Officials (PPAT) play a crucial role in resolving disputes over gifts of uncertified land. Their duties include verifying land ownership documents, drafting valid gift deeds, and facilitating mediation in the event of a dispute. Research by Lathifah Hanim and Rurin Mariyasi Dewi (2025) shows that PPATs play a strategic role in every stage of the land gift process. This process begins with the examination of valid ownership documents, even if the land is uncertified. If a dispute arises, the PPAT acts as a mediator to reach an amicable resolution.

However, various obstacles exist in the practice of PPAT. Internal obstacles, such as difficulties in land verification without complete data and disputes with parties rejecting grants, as well as external obstacles, such as unclear land boundaries and poor public legal understanding, need to be addressed. Proposed solutions include completing administrative data, mediation, re-measuring, and educating the public about legal procedures and land documents.

Legal remedies available to parties injured by falsified authentic deeds include several steps. First, the injured party can file a civil lawsuit to annul the falsified deed and restore land rights under Article 1365 of the Civil Code (KUHPerdana). Second, they can report the criminal

act of document falsification to law enforcement officials, such as the police or the Prosecutor's Office, who can conduct an investigation and prosecution.

To address the risk of forgery, Land Deed Officials (PPAT) and Notaries must apply the principles of caution and accuracy in every deed they create. Collaboration with professional associations, ongoing training, and cooperation with the Land Office are important strategies for enhancing legal protection for parties involved in land transactions. Strengthening regulations, through revisions to land regulations and clarification of the role of PPATs, is also necessary to increase the effectiveness of dispute prevention.

Improving the capacity of Land Deed Officials (PPAT) through ongoing training is an effective strategy for addressing various land disputes. With a better understanding of the law, PPATs can expedite certification and minimize the risk of future disputes. In conclusion, forgery of authentic deeds used as the basis for land registration is a serious problem that can harm parties with legitimate land rights. Legal remedies include civil lawsuits, criminal reports, and protection and mediation through PPATs and land institutions.

Therefore, strengthening the role of Land Deed Officials (PPAT) and implementing comprehensive legal measures are crucial to ensuring legal security in land transactions, preventing losses to the public, and reducing land mafia practices. Without these measures, the risk of disputes and public losses will remain high, especially for land that lacks official certificates as proof of ownership.

D. Conclusion

Based on the results of research and discussion regarding Legal Efforts Against Forgery of Authentic Deeds Used as the Basis for Land Registration, several conclusions can be drawn as follows: Authentic deeds have a very strong legal standing in the land registration system in Indonesia because they function as perfect written evidence, as long as the deed is made in accordance with the provisions of laws and regulations and by authorized officials. Authentic deeds, especially sales and purchase deeds made by PPAT, are the main basis for the transfer of land rights and the issuance of ownership certificates.

The evidentiary force of an authentic deed is nullified if it is proven to be forged, and therefore, any certificate of ownership issued based on the forged deed can be declared legally flawed and revoked. In this case, the injured party has the right to legal protection, whether through civil, criminal, or land administration mechanisms.

Legal action against forgery of authentic deeds can be taken through three channels, namely: Civil channels, through a lawsuit for cancellation of the deed and certificate and a claim for compensation; Criminal channels, by reporting the act of forgery of authentic deeds

in accordance with the provisions of the Criminal Code; Land administration channels, through a request for cancellation of the certificate to the National Land Agency. These three channels are forms of legal protection that aim to restore the rights of the injured party and maintain legal certainty in land registration.

Bibliography

- Abiyansha, M., A. (2023). Analysis of Criminal Responsibility for Land Mafia Perpetrators in the Crime of Forgery of Land Certificates. Thesis, Faculty of Law, Sriwijaya University.
- Agustin, R., S. (2021). Criminal Liability for Forgery of Authentic Deeds Used as the Basis for Applying for Land Ownership Certificates. *Lex Journal: Legal & Justice Studies*. Vol. 4 Np. 2. DOI:10.25139/lex.v4i2.3382
- Al Mujarra, T., E. Madiong, B. Kamsilaniah. (2024). Law on Investigating Criminal Acts of Forgery of Gift Deeds in the Jurisdiction of the Makassar Police. *Indonesian Journal of Legality of Law*. Vol. 7 No. 1, pp. 75-82
- Arifin, H. & Sumanto, L. (2024). Responsibility of Ppat for Authentic Deeds Case Study of Decision Number: 250/Pid.B/2022/Pn.Jkt.Brt. Between Nirina Zubir and Erwin Ridwan as Ppat. *Critical Journal of Legal Studies*. Vol. 9 No. 5 Pp.69-83.
- Boedi Harsono. (2003). *Indonesian Agrarian Law, Collection of Land Law Regulations*, Jakarta: Djambatan.
- Chomzah, A., A. (2002). *Land Law; Granting of Rights to State Land, Certificates and Problems*, Prestasi Pustaka, Jakarta, pp. 5-6.
- Christellia GN Lamatenggo, Harly S. Muaja, Deizen D. Rompas (2021). Legal Study of Forgery of Simple Documents (Article 263 of the Criminal Code) in Relation to Forgery of Authentic Deeds (Article 264 Paragraph (1) Ke 1 of the Criminal Code), *Lex Crimen*, Vol. XNo. 1, pp. 70-78.
- Civil Code.
- Criminal Code (KUHP)
- Dr. Rahmat Ramadhani, SH, MH, *AGRARIAN REFORM: Accelerated Steps Towards Just and Prosperous Land Rights* (Medan: UMSU Press, 2025), pp. 93–97 (section “Land Justice”).
- Government Regulation Number 24 of 1997 concerning Land Registration
- Government Regulation Number 24 of 2016 concerning Amendments to Government Regulation Number 37 of 1998 concerning Regulations on the Position of Land Deed Making Officials
- Gunadi, I. & J Efendi, (2016). *Quick and Easy Understanding of Criminal Law*, Prestasi Pustaka, Jakarta.

- Hanifah, I., Hariyanto, H., Ginting, L., Koto, I., & Syafriana, R. (2026). Legal Protection of Indonesia's Fisheries from Foreign Investment: A Social-State Approach. *Jurnal IUS Kajian Hukum dan Keadilan*, 14(1).
- Harsono, B. (2008), *Indonesian Agrarian Law: History of the Formation of UUPA, Contents and Implementation*, Revised Ed. 8th Edition, Jakarta: Djambatan.
- Harsono, B. (2016). *Indonesian Agrarian Law: History of the Formation of the Basic Agrarian Law, Contents and Implementation*, Trisakti University, Jakarta.
- Herman, H., Simanjuntak, MH, Sipayung, A., Agustina, Y. (2022). Legal Analysis of Certificates Due to Land Measurement Errors. *Darma Agung Journal*, 30(2), 155-168.
- Jasmine, B., Hapsari, P., Program, AP, & Kenotariatan, SM (2023). Validity of Notarial Deeds Signed by Applicants with Dementia. *NOTARIUS*, 16.
- Jelita, M., D. I Nyoman Sukandia, I Made Minggu Widyantara (2024). Application of Law to the Criminal Act of Falsification of Land Title Certificates in Labuan Bajo, West Manggarai Regency. *Journal of Legal Analogy*. Volume 6, Issue 2, pp. 223-228 <https://doi.org/10.22225/jah.6.2.2024.223-228>.
- Kaligis, G., V. Paransi, G., N. Nachrawy, N. (2021). Judge's Decision on the Criminal Act of Forgery of Documents According to Article 263 of the Criminal Code, *Lex Privatum*, Vol. IX No. 4, pp. 175-182.
- Kelung, N., & Binei, M. (2022). A Legal Review of the Cancellation of Land Ownership Rights Due to Administrative Defects. *Journal Scientia De Lex*, 10(1), 16-21.
- Khasanah, D., & Alfons. (2021). Legal Analysis of the Consequences of the Destruction of Collateral Objects Attached to Mortgage Rights Due to Natural Disasters. *Widya Bhumi Journal*, 1(2), 149–159.
- Kotalino, JS, Maarthen, Y., & Lambonan, ML (2023). Case Analysis of the Cancellation of Land Title Certificates (Case Study of Decision No. 33/G/2014/Ptun. Mdo). *Lex Administratum*, 11(3)
- Law Number 5 of 1960 concerning Basic Agrarian Regulations (UUPA).
- Lubis, MAM (2022). Cancellation of Land Title Certificates Due to Negligence of the National Land Agency and as Executor of Court Decisions. *Smart Law Journal (JSH)*, 1(1), 108-118.
- Lukman A., & Hartono, F. (2022). "Legal Protection Against Forgery of Sale and Purchase Deed Number 281/Sdj/Iv/2013 Carried Out by a Temporary Land Officer (Ppat) in Wanakerta Village, Tangerang Regency". Internal Research Report of Lecturers, Pancasila University, Faculty of Law, Jakarta, p. 29.

- Marzuki, P., M. (2017). *Legal Research Revised Edition*. Jakarta: Kencana.
- Masriani, YT (2022). The Importance of Land Certificate Ownership Through Land Registration as Proof of Rights. *Usm Law Review Journal*, 5(2), 539.<https://doi.org/10.26623/julr.v5i2.5777>
- Mertokusumo, S. (2006) *Civil Procedure Law*, Liberty, Yogyakarta.
- Muhaimin. (2020). *Legal Research Methods*. Mataram: Mataram University Press.
- Muhammad, A. (2014). *Law and Legal Research*, Bandung: PT. Citra Aditya Bakti.
- Ningtyas, MA, Ardiansyach, TS, Maulana, W., & Bachtiar, B. (2023). Legal Flaws in the Transfer of Land Rights. *Iuris Notitia: Journal of Legal Studies*, 1(1), 20-27.
- Nugroho, S., S. Haryani, A., T. Farkhani, (2020), *Legal Research Methodology*. Sukaharjo, Oase Pustaka
- Nurhidayat, F. & Puspitosari, H. (2024). Law Enforcement of the Criminal Act of Forgery of Land Certificates by Investigators of the Criminal Investigation Directorate of the North Maluku Regional Police. *Doktrin: World Journal of Law and Political Science*. Vol. 2, No. 1, pp. 289-299 DOI:<https://doi.org/10.59581/Doktrin-widyakarya.v2i1.1963>
- Palenewen, J., Y. Agrarian Law and Land Registration in Indonesia. Bandung: Cv Widina Media Utama.
- Parlindungan, A., P. (1998), *Land Registration in Indonesia*, Bandung: Mandar Maju.
- Qamar, N. & Rezah, F., S. (2020), *Legal Research Methods, Doctrinal and Non-Doctrinal*, Makassar: Publisher CV. Social Politic Genius (SIGn)
- Rahardjo, S. (2006). *Legal Science*, Bandung: PT. Citra Aditya Bakti.
- Rahmat Ramadani (2022). "Legal Status of Sales and Purchase Agreements (PPJB) in Land Rights Transfer Registration Activities", *SOSEK: Journal of Social and Economics*, Vol. 2, No. 1, pages 45-50.
- Rahmat Ramadhani (2021). "Land Registration as a Step to Obtain Legal Certainty Regarding Land Rights." *SOSEK: Journal of Social and Economics*. Vol. 2, Issue 1, pages 31-41.
- Rasendria, A., D. (2024). *Legal Protection for Rights Holders Due to the Issuance of Administratively Defective Land Title Certificates (Case Study of the Surakarta District Court Decision Number: 149/PID.B/2023/PN.SKT)*. Thesis, National Land College, Ministry of Agrarian Affairs and Spatial Planning/National Land Agency of the Republic of Indonesia, Yogyakarta.
- Retnowulan Sutantio and Iskandar Oeripkartawinata, 1995, *Civil Procedure Law in Theory and Practice*, Bandung: Mandar Maju.

- Santoso, U. (2012). *Agrarian Law: A Comprehensive Study*, Kencana Prenadamedia Group, Jakarta.
- Siagian, E., J. Maramis, M., R. Taroreh, R., A. (2021). Legal Study of the Criminal Act of Forgery of Land Ownership Certificates, *Lex Crimen*, Vol. X No. 6, pp. 83-92.
- Siahan, MP (2003). *Land and Building Acquisition Tax: Theory and Practice*. Raja Grafindo Persada.
- Sianipar, G., G., H. Yamin, M. Sembiring, R. (2025). Legal Analysis of Legal Protection for Replacement Certificates Based on Statement 450/Pid.B/2022/PN.Smn. *Indonesian Journal of Humanities and Social Sciences*. Vol 6 Issue 2. pp. 293-308.
- Simatupang, R. S. A., Hanifah, I., & Mansar, A. (2025). The Concept of Restitution as Legal Accountability in the Crime of Human Trafficking. *Pena Justisia: Media Komunikasi dan Kajian Hukum*, 24(1), 3554-3462.
- Situmorang, V., M. (2009). *Gross Deeds in Proof and Execution*, Rinika Cipta, Jakarta.
- Soegondo, R. (2005). *Law of Evidence*, PT. Pradnya Paramita, Jakarta.
- Soerodjo, I. (2003). *Legal Certainty of Land Rights in Indonesia*, Arloka, Surabaya.
- Soesilo, R. (1995), *Criminal Code (KUHP): and its complete article by article comments*, Bogor: Politeia.
- Solikin, N. (2021), *Introduction to Legal Research Methodology*. Surabaya: CV. Qiara Media Publisher
- Solossa, M. Rongalaha, J. Palenewen, J., Y. (2024). Issuance of Genuine but Fake Land Ownership Certificates at the Jayapura City Land Office. *Socius: Journal of Social Sciences Research*. Vol. 2, No. 4, pp. 100-109
- Subekti, R. (2007). *Law of Evidence*, PT. Pradnya Paramita, Jakarta.
- Sudikno Mertokusumo, (2009), *Indonesian Civil Procedure Law*, Yogyakarta: Liberty, page 234
- Sunggono, B. (2015). *Legal Research Methods*. Jakarta: Raja Grafindo Persada.
- Thamrin, H. (2011), *Making Land Deeds by Notaries*, Laksbang Pressindo, Yogyakarta.
- Widyastuti, T., V. Hamzani, A., I. Aryani, F., D. (2024), *Research Methodology and Writing in the Field of Legal Science: Theory and Practice*. Medan: PT Media Penerbit Indonesia
- Wiharjo, W., & Isharyanto, JE (2022). Legal Consequences of Land Sale and Purchase Deeds Drawn Up by Land Deed Officials with False Identities of the Applicants. *Notary Law Research*, 3(2), 55.<https://doi.org/10.56444/nlr.v3i2.3408>

Yuliana, Y. (2023). Implementation of Land Title Certificate Cancellation Due to Administrative Defects and Court Decisions in East Lombok Regency. *AL-MANHAJ: Journal of Islamic Law and Social Institutions*, 5(2), 2031-2044.