

LEGAL SYNCHRONIZATION STUDY ON THE ISSUANCE OF DUPLICATE LAND CERTIFICATES AND THEIR LEGAL CONSEQUENCES (A CASE ANALYSIS OF ADMINISTRATIVE COURT DECISION NO. 79/G/2023/PTUN.BDG IN CONJUNCTION WITH THE APPEAL DECISION NO. 8/B/2024/PT.TUN.JKT AND THE JUDICIAL REVIEW DECISION NO. 21/PK/TUN/2025)

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Abstrak: *This study examines the legal implications arising from the issuance of duplicate land certificates in Indonesia's land registration system based on the analysis of decisions delivered by the Administrative Court (PTUN), the Administrative High Court (PT TUN), and the Supreme Court in Judicial Review (PK). The research employs a normative juridical method supported by case analysis and prescriptive interpretation. The findings indicate that the regulatory framework consisting of the Basic Agrarian Law of 1960, Government Regulation No. 24 of 1997, and technical land regulations is normatively coherent. The emergence of duplicate certificates is attributed to administrative verification failures by the National Land Agency rather than regulatory disharmony. The judicial decisions consistently identify substantive administrative defects, resulting in annulment, mandatory revocation, and corrective administrative measures. The voluntary execution undertaken by the National Land Agency is legally classified as execution of the judgment. The Supreme Court's dismissal of the Judicial Review confirms the finality of the annulment and affirms that only certificates issued through lawful procedures possess legal validity. The study highlights the importance of administrative diligence and judicial oversight.*

Key words: *Duplicate certificates, land registration, agrarian law, administrative defects*

I. INTRODUCTION

Land constitutes a fundamental element within Indonesia's socio-economic and legal framework. As a constitutional state, Indonesia bears the obligation to ensure that every citizen receives adequate protection of their land rights through a coherent, transparent, and accountable system of land administration. This obligation is expressly embedded in Article 19 of the Basic Agrarian Law (UUPA) of 1960, which mandates the implementation of land registration as a means of securing legal certainty. The operational mandate is further codified

in Government Regulation No. 24 of 1997, which designates the land certificate as strong evidence of the physical and juridical attributes of a land parcel. Thus, land registration functions not merely as an administrative formality, but rather as a juridical instrument essential to maintaining order within Indonesia's agrarian legal system.

Despite this framework, Indonesia's land administration continues to encounter persistent structural challenges, particularly the emergence of duplicate land certificates, wherein two or more certificates are issued for the same land parcel. Such conflicts often originate from deficiencies in cadastral verification, inaccuracies in base mapping, insufficient interagency coordination, or outright maladministration.¹ According to Sumardjono, the proliferation of overlapping certificates is primarily rooted in weak data accuracy and inadequate institutional synchronization within Indonesia's land governance.²

Within agrarian legal doctrine, land registration is central to the realization of legal certainty. Harsono asserts that any administrative inaccuracy in the registration process undermines the very purpose of land registration and inevitably opens pathways to complex legal disputes.³ In administrative law scholarship, the improper issuance of a land certificate is classified as maladministration, particularly when the decision is made without adherence to procedural and substantive standards.⁴ Yahya Harahap reinforces this view by stating that an administrative decision must be annulled if its formation violates fundamental principles of good governance.⁵

The case examined in this study provides a clear empirical illustration of these doctrinal concerns. The dispute arose when the National Land Agency (BPN) issued a land certificate for a parcel that had been physically possessed by another party. The aggrieved party filed a claim before the Administrative Court (PTUN), and the PTUN annulled the certificate, finding the issuance process to be procedurally flawed. This is fully aligned with the administrative law principle that any defective administrative decision must be invalidated to safeguard the legitimacy of public authority.⁶

Dissatisfied with the ruling, BPN and the certificate holder filed an appeal, which was subsequently rejected by the Administrative High Court, thereby affirming the PTUN's judgment. The certificate holder then pursued a Judicial Review (Peninjauan Kembali) before the Supreme Court; however, in Decision No. 21/PK/TUN/2025, the Supreme Court dismissed the petition, rendering the appellate decision final and binding.

This judicial sequence highlights the profound implications of duplicate certificates for the realization of legal certainty, a foundational value of the rule of law. Mertokusumo asserts that legal certainty requires clear legal norms, consistent administrative implementation, and judicial decisions capable of effective enforcement.⁷ When multiple certificates are issued for the same parcel, legal certainty collapses into uncertainty, triggering prolonged disputes and institutional inefficiency.

¹ Maria S.W Sumardjo, *Land in the Perspective of Economic, Social, and Cultural Rights*, Jakarta: Kompas, 2008, p. 48–50.

² *Ibid.*, p. 121–123

³ Boedi Harsono, *Indonesian Agrarian Law*, Revised Edition, Jakarta: Djambatan, 2005, p. 72–74.

⁴ Philipus M. Hadjon, *Introduction to Indonesian Administrative Law*, Yogyakarta: Gadjah Mada University Press, 2002, p. 113–115.

⁵ M. Yahya Harahap, *Administrative Court Procedural Law*, Jakarta: Sinar Grafika, 2022, p. 352–354.

⁶ Indroharto, *Understanding the Indonesian Administrative Court Law*, Book I, Jakarta: Sinar Harapan, 1993, p. 142–144.

⁷ Sudikno Mertokusumo, *Legal Interpretation*, Yogyakarta: Liberty, 2009, p. 176–178.

Furthermore, this issue is closely intertwined with the principle of legal protection. Hadjon emphasizes that legal protection must be afforded when a governmental action is unlawful or results in material harm to citizens.⁸ In this case, the wrongful issuance of a certificate produced significant harm to the rightful possessor of the land, necessitating recourse to lengthy judicial proceedings.

Beyond certainty and protection, the dispute implicates the broader normative concept of substantive justice. Rawls argues that justice as fairness obligates the state to ensure that individuals are not disadvantaged by institutional or procedural errors.⁹ The existence of duplicate certificates forces the affected party to undertake protracted litigation merely to restore their rights, illustrating a structural imbalance in the system of land governance.

Accordingly, this study is of substantial importance in examining how legal synchronization, the alignment between legal norms, administrative conduct, and judicial interpretation, operates within the context of land registration. Any divergence among these elements not only produces legal uncertainty, but also generates adverse consequences for individuals, institutions, and the broader stability of land governance in Indonesia.

II. RESEARCH METHOD

This research adopts a normative juridical approach, which conceptualizes law as a system of norms drawn from statutory regulations, judicial decisions, and scholarly doctrine. This approach is particularly relevant because the issue of duplicate land certificates concerns the validity of administrative actions, the scope of governmental authority, and the synchronization of legal norms within the land administration framework.¹⁰

The study also employs a conceptual approach, which draws upon theoretical constructs such as legal certainty, legal protection, substantive justice, and the general principles of good governance. This approach ensures that the analysis incorporates not only positive law, but also the foundational legal theories that guide interpretation and application.¹¹

The research relies on primary legal materials, including the Basic Agrarian Law of 1960, Government Regulation No. 24 of 1997, internal BPN regulations, and judicial decisions, particularly the Supreme Court Judicial Review Decision No. 21/PK/TUN/2025. Secondary legal materials consist of authoritative textbooks, journal articles, and academic commentaries. Tertiary materials include legal dictionaries and legal encyclopedias.

Data are analyzed using a prescriptive analytical method, which not only identifies the relevant norms but also evaluates how these norms ought to be interpreted and applied.¹² The analytical process follows the qualitative interactive model, involving stages of data reduction, data display, and conclusion drawing. This model enables a rigorous examination of the relationship between legal norms, administrative action, and judicial reasoning, thereby providing a comprehensive assessment of legal synchronization in the issuance of duplicate land certificates.

III. RESULTS AND DISCUSSION

⁸ Hadjon, Philipus M., *Op. Cit.*, p. 25–28.

⁹ John Rawls, *A Theory of Justice*, Cambridge: Harvard University Press, 1971, p. 52–55.

¹⁰ Soerjono Soekanto & Sri Madmuji, *Normative Legal Research*, Jakarta: Rajawali Press, 2004, p. 13–14.

¹¹ Peter Mahmud Marzuki, *Legal Research*, Jakarta: Kencana, 2005, p. 35–40.

¹² L.J. van Apeldoorn, *Introduction to Law*, Jakarta: Pradnya Paramita, 2001, p. 58–60.

The dispute analyzed in this research originated from the issuance of two land certificates over the same parcel by the National Land Agency (BPN). The existence of conflicting certificates created overlapping legal claims and undermined the purpose of land registration, which is to ensure legal certainty as prescribed by Article 19 of the Indonesian Basic Agrarian Law (UUPA).¹³ Under Government Regulation No. 24 of 1997, the issuance of a land certificate requires strict verification of physical and juridical data, and any deviation from these procedures exposes the land administration system to conflict and legal ambiguity.

To resolve the resulting legal uncertainty, the plaintiff filed a claim before the Administrative Court (PTUN) Bandung, challenging the validity of the later-issued certificate. After examining the administrative procedures and documentary evidence, PTUN Bandung issued Judgment No. 79/G/2023/PTUN.BDG, granting the claim in full. The Court found that the contested certificate contained substantive administrative defects due to inadequate verification of land history and physical boundaries, violating the principle of accuracy inherent in land registration.¹⁴ The Court therefore declared the certificate null and void and ordered BPN to revoke it and correct the registry in accordance with its administrative duties.¹⁵

BPN and the holder of the later-issued certificate appealed to the Administrative High Court (PT TUN) Jakarta. However, PT TUN Jakarta, through Judgment No. 8/B/2024/PT.TUN.JKT, rejected the appeal and affirmed the lower court's ruling. The Court held that the administrative defects identified were substantive rather than procedural, thus justifying cancellation. The appellate judges emphasized that accuracy, prudence, and legal certainty are essential elements of administrative actions, referencing the doctrinal view that government officials must adhere to the principles of good administration.

Following the unsuccessful appeal, the certificate holder filed a Judicial Review (PK) petition before the Supreme Court, asserting that the earlier decisions contained legal errors and overlooked new evidence. In this stage, BPN served as the respondent because the disputed administrative act originated from the agency. The Supreme Court, through Judicial Review Decision No. 21/PK/TUN/2025, dismissed the petition entirely, holding that no new evidence or legal basis existed to overturn the previous rulings. As a result, the annulment attained final and binding legal force (*inkracht van gewijsde*).

Although BPN voluntarily executed the judgment by revoking the certificate, such voluntariness does not alter the legal nature of the action. Execution of a final judgment is mandatory under administrative law, and voluntariness merely reflects the manner of compliance rather than the source of the obligation.¹⁶ This distinction is consistent with administrative law theory, which views the execution of judicial rulings as an inherent requirement of the rule of law and not a discretionary act of the administrative body.

From a doctrinal perspective, the issuance of duplicate certificates constitutes a violation of the principle of legal certainty, a core concept in legal theory. According to Radbruch's theory, law must provide clarity and prevent contradictory claims among citizens.¹⁷ The presence of two certificates for a single parcel destroys legal coherence and

¹³ Boedi Harsono, *Op. Cit.*, p. 72–74.

¹⁴ Maria SW Sumardjono, *Op. Cit.*, p. 48–50.

¹⁵ Philipus M Hadjon, *Op. Cit.*, p. 113–115.

¹⁶ Sudikno Mertokusumo, *Op. Cit.*, p. 176–178.

¹⁷ John Rawls, *Op. Cit.*, p. 52–55.

undermines the reliability of the land registration system. Furthermore, in line with Hadjon's theory of legal protection, administrative authorities have an obligation to prevent arbitrary or negligent actions that may harm citizens. The judicial intervention in this case serves as a corrective mechanism to restore legality and prevent further administrative irregularities.

Beyond the immediate dispute, this case reveals broader structural issues within Indonesia's land administration. The emergence of duplicate certificates reflects deficiencies in administrative verification, weak internal oversight, and inconsistencies between physical and juridical data. These weaknesses have the potential to damage public trust, jeopardize investment security, and amplify land-related conflicts. The judiciary, through consistent rulings at all levels, reaffirmed the imperative that administrative decisions must strictly comply with statutory procedures to ensure legal certainty and protect public interest.¹⁸

Overall, this case demonstrates how judicial oversight operates as a safeguard against administrative errors and as a mechanism to reinforce statutory mandates in land governance. The consistent position of the courts establishes an important precedent that issuance of land certificates must be grounded upon accurate verification, adherence to legal requirements, and compliance with principles of good governance. The case therefore contributes significantly to the development of land administration jurisprudence and emphasizes the necessity of strengthening verification and data synchronization mechanisms within BPN to prevent recurrence of similar disputes.

3.1 Synchronization of Laws in the Case of Issuing Duplicate Land Certificates

The issuance of duplicate land certificates in Indonesia exposes a fundamental misalignment between the statutory framework of land administration and the administrative acts undertaken by the National Land Agency (BPN). Although the Basic Agrarian Law (UUPA 1960) and Government Regulation No. 24 of 1997 were designed to confer legal certainty and orderly land registration, these objectives are undermined when administrative authorities fail to implement statutory procedures with due diligence. As Soerjono Soekanto observes, the effectiveness of a legal system presupposes harmony between legal substance, legal structure, and legal culture; deviation in any of these components results in systemic dysfunction and legal uncertainty.¹⁹ The emergence of duplicate certificates therefore reflects a breakdown in the institutional coherence necessary for the proper functioning of land law.

Within Indonesia's land law architecture, the relationship between *lex generalis* and *lex specialis* plays a crucial role in ensuring administrative integrity. The *lex generalis*, consisting of UUPA and PP No. 24/1997, establishes foundational principles governing registration, verification, and protection of land rights. In parallel, the *lex specialis*, a series of technical regulations issued by BPN, details mandatory procedures for boundary determination, measurement, data verification, and the incorporation of physical and juridical evidence. Under the doctrine *lex specialis derogat legi generali*, technical regulations prevail in situations requiring administrative precision.²⁰ When these technical norms are disregarded, administrative actions become inconsistent with the statutory objectives they are intended to serve, thereby creating conditions for legal conflict, such as the issuance of overlapping certificates.

¹⁸ Ridwan HR, *Op. Cit.*, p. 214.

¹⁹ Soerjono Soekanto, *Factors Influencing Law Enforcement*, Jakarta: Rajawali, 1983, p. 12.

²⁰ Ridwan HR, *Administrative Law*, Jakarta: Rajagrafindo, 2016, p. 88.

The decision of the Administrative Court (PTUN Bandung) to annul the disputed certificate represents a judicial intervention aimed at restoring congruence between administrative conduct and the governing legal framework. The Court's reasoning emphasized that BPN failed to carry out adequate verification of physical and juridical data, rendering the certificate legally defective from its inception. Harsono underscores that the validity of a land certificate depends upon the accuracy and integrity of the registration process; any deviation constitutes a substantive defect capable of invalidating the resulting certificate.²¹ Thus, the PTUN decision functions not merely as dispute resolution but as a corrective mechanism for administrative misapplication of statutory duties.

The Administrative High Court (PT TUN Jakarta) reinforced this corrective action, affirming the nullification of the certificate and characterizing the administrative defect as substantive rather than procedural. This appellate affirmation is significant from a legal certainty perspective. As Utrecht explains, predictability and consistency in judicial decisions form essential components of the rule of law, ensuring that similarly situated legal issues are resolved according to coherent principles.²² The PT TUN decision thus strengthens the synchronization of legal norms by ensuring that administrative errors of a substantive nature are uniformly treated as grounds for annulment.

The Supreme Court's rejection of the Petition for Judicial Review (PK) marks the final stage in the synchronization process. The Court found no judicial oversight or newly discovered evidence sufficient to alter the conclusions reached by the lower courts. In administrative law doctrine, the administrative judiciary serves as a legality control mechanism, ensuring that administrative authorities act within the scope of their lawful competence. Philipus Hadjon argues that judicial oversight is central to maintaining the principle of legality in administrative governance.²³ By refusing the PK, the Supreme Court affirmed the doctrinal correctness of the lower courts' reliance on *lex generalis* and *lex specialis* norms while reinforcing the probative value of accurate administrative procedure.

A holistic reading of these decisions reveals that the core issue was not ambiguity or insufficiency in the legislative framework, but administrative non-compliance with the technical requirements governing registration. This finding aligns with the view of Maria S.W. Sumardjono, who asserts that land disputes in Indonesia typically arise from administrative inaccuracies rather than legislative deficiencies.²⁴ When technical procedures especially those related to verification of physical boundaries, documentary completeness, and historical land occupation are not implemented correctly, the statutory mechanism intended to guarantee legal certainty is rendered ineffective. Judicial correction therefore becomes essential to re-establish normative order and administrative accountability.

Viewed through the lens of legal theory, the decisions collectively demonstrate a synthesis between legal certainty and substantive justice. Legal certainty is reaffirmed by establishing that only certificates issued in accordance with statutory procedures confer enforceable rights. Substantive justice is realized through judicial protection of legitimate landholders whose rights would otherwise be jeopardized by administrative irregularities. As Jimly Asshiddiqie notes, the administrative judiciary operates as an institutional safeguard

²¹ Boedi Harsono, *Op.Cit.*, p. 302

²² Utrecht, *Introduction to Indonesian Law*, Jakarta: Ichtar Baru, 1989, p. 40.

²³ Philipus M. Hadjon, *Op.Cit.*, p. 189.

²⁴ Maria S.W. Sumardjono, *Op.Cit.*, p. 155.

designed to uphold both procedural fairness and substantive justice by subjecting administrative actions to rigorous legality review.²⁵

In sum, the judicial annulment of the duplicate certificate exemplifies a process of legal synchronization that restores harmony between statutory norms (*lex generalis*), technical administrative rules (*lex specialis*), and the practical administration of land registration. The sequential decisions of PTUN, PT TUN, and the Supreme Court underscore the critical role of judicial oversight in maintaining the integrity of Indonesia's land registration system, ensuring that the foundational aims of land law, legal certainty, administrative order, and protection of rights are effectively realized in practice.

3.2 Legal Consequences Arising in Cases of Duplicate Land Certificates

The ruling of the Administrative Court (PTUN) constitutes the foundational source of legal consequences in the adjudication of duplicate land certificates. The Court determined that the certificate issued by the National Land Agency (BPN) suffered from a substantive administrative defect, arising from the failure to verify physical and juridical data in accordance with Government Regulation No. 24 of 1997. As a result, the certificate was annulled, producing the immediate legal effect of extinguishing its evidentiary and juridical force once the judgment becomes final. An invalidated certificate loses its capacity to function as proof of title, to serve as an object of transfer or mortgage, or to anchor any subsequent legal transaction. Harsono emphasizes that a land certificate derives its legal strength from the integrity of the administrative procedures that precede its issuance; where those procedures are defective, the certificate cannot claim the status of strong evidence of title.²⁶ Therefore, the first legal consequence is the complete nullification of the legal effects previously attached to the annulled certificate.

In addition to declaring the certificate invalid, the PTUN judgment imposes a mandatory corrective obligation on BPN to revoke the defective certificate and restore the accuracy of the land register and cadastral records. This obligation represents not a mere administrative formality but a substantive legal duty embedded in the doctrine of administrative restoration, whereby an administrative authority must undo the consequences of an unlawful act. Philipus Hadjon underscores that such restoration is a fundamental expression of the principle of legality, ensuring that the state rectifies the legal distortions resulting from its own administrative errors.²⁷ Thus, the second legal consequence is the juridical compulsion imposed on BPN to undertake affirmative corrective action consistent with the court's order.

The affirmation of the PTUN judgment by the Administrative High Court (PT TUN) further consolidates the legal consequences arising from the case. By upholding the lower court's ruling, PT TUN confirms that the administrative error underlying the certificate was not trivial but constituted a material breach of the duty of due care that governs land administration. Utrecht observes that appellate affirmation strengthens the coherence and predictability of judicial reasoning by validating the normative conclusions of the first instance.²⁸ Accordingly, the legal consequence is the reinforcement of the certificate's

²⁵ Jimly Asshiddiqie, *Administrative Court Procedural Law*, Jakarta: Sinar Grafika, 2015, p. 58.

²⁶ Boedi Harsono, *Op.Cit.*, p. 302.

²⁷ Philipus M. Hadjon, *Op.Cit.*, p. 189.

²⁸ Utrecht, *Op.Cit.*, p. 40.

defective status and the solidification of BPN's obligation to perform administrative correction.

The Supreme Court's dismissal of the Petition for Judicial Review (PK) produces the most definitive legal consequence. By rejecting the PK, the Court confirms that no novum, factual oversight, or judicial misapplication existed in the previous judgments. The rejected PK thereby renders the annulment final, conclusive, and unassailable, confirming that the disputed certificate was void from the outset (void ab initio). Jimly Asshiddiqie explains that the rejection of a PK petition reinforces the full authoritative force of the lower courts' rulings, thereby establishing the highest degree of legal certainty available in the administrative justice system.²⁹ Consequently, the ultimate legal consequence is the complete extinction of the defective certificate's legal existence and its removal from the legal order.

A further legal consequence concerns the implementation of the judgment, particularly the distinction between voluntary compliance and enforced execution. In this matter, BPN complied voluntarily by revoking the certificate and updating the administrative records without requiring an execution order. However, from a legal standpoint, voluntary compliance does not alter the juridical nature of the act: it remains an execution of a judicial decision, because execution refers to the realization of the judgment's operative provisions, regardless of whether coercion is employed. Ridwan HR clarifies that voluntariness pertains only to the manner of execution, while the legal characterization remains that of enforcing a binding judicial mandate.³⁰ Thus, the legal consequence is that the judgment has been fully executed, eliminating any grounds for alleging non-compliance.

At an institutional level, the series of judgments produces broader systemic consequences for the governance of land administration. The repeated judicial findings across three tiers demonstrate that BPN failed to fulfil its statutory duty of verification, cadastral assessment, and archival maintenance. Sumardjono notes that land disputes in Indonesia predominantly arise from administrative lapses rather than legislative shortcomings, and judicial oversight plays a critical role in correcting such deficiencies.³¹ Therefore, the judgments compel BPN to enhance procedural safeguards, improve internal oversight, and strengthen administrative diligence to prevent recurrence of duplicate certificates.

Finally, the hierarchical rulings culminate in the definitive recognition of the legally valid certificate. Only the certificate proven to have been issued through lawful procedures retains legal force and receives the protection accorded by the doctrine of *rechtsvermoeden van juistheid*, which presumes the correctness of a lawfully issued administrative act. Soekanto asserts that legal certainty is achieved when judicial determinations eliminate competing legal claims and leave a single, authoritative legal position.³² Thus, the final legal consequence is the restoration of certainty, the clarification of ownership status, and the confirmation of the lawful certificate holder's rights.

IV. CONCLUSION

This study concludes that the emergence of duplicate land certificates does not stem from a normative disharmony within Indonesia's land law framework, but from administrative

²⁹ Jimly Asshiddiqie, *Op. Cit.*, p. 112.

³⁰ Ridwan HR, *Op. Cit.*, p. 214.

³¹ Maria S.W. Sumardjono, *Op. Cit.*, p. 155.

³² Soerjono Soekanto, *Op. Cit.*, p. 12.

lapses by the National Land Agency (BPN) in implementing an already harmonized legal structure. The Basic Agrarian Law of 1960, Government Regulation No. 24 of 1997, and the technical regulations of land administration as the governing *lex specialis* are normatively coherent. However, the judicial findings in the PTUN, PT TUN, and Supreme Court (PK) decisions demonstrate that these norms were not applied with the level of diligence required, particularly in relation to the verification of physical and juridical data. Thus, the issue of synchronization lies not at the normative level but in the consistency and accuracy of administrative implementation.

With regard to legal consequences, the series of judicial decisions establish that the administratively defective certificate is null and devoid of any evidentiary or juridical value. BPN is legally obliged to undertake corrective administrative actions, including revocation of the certificate, rectification of the land register, and correction of cadastral records. Although BPN carried out these measures voluntarily, such actions legally constitute the execution of a judicial ruling. The Supreme Court's dismissal of the PK petition renders the annulment final and irrefutable, confirming that only the certificate issued in accordance with lawful procedures retains legal force. This study therefore affirms the centrality of legal certainty, administrative accuracy, and judicial oversight as essential safeguards in preventing and resolving conflicts arising from duplicate land certificates.

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