

## The Criminal Responsibility for the Involvement of National Land Agency Officials in Land Mafia Cases

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**Abstract.** *This study aims to analyze: 1) The authority of the National Land Agency (BPN) in efforts to eradicate the land mafia. 2) Criminal responsibility for the involvement of National Land Agency (BPN) officials in the land mafia case. The approach method in this research is a sociological juridical approach. The specification of the research used is descriptive analytical research. Types of data using primary and secondary data. Data collection by interview method and literature study. The data analysis method used is qualitative analysis. The results of the study concluded: 1) The authority of the National Land Agency (BPN) in efforts to eradicate the land mafia can be carried out through preventive and repressive efforts. Preventive action can be carried out by carrying out bureaucratic reforms to realize good governance. The welfare of officials must also be cared for so that their lives are guaranteed and they are not interested in committing evil acts. To support this effort, monitoring and supervising officials must be carried out so that they are on the right track. Meanwhile, repressive efforts to end the land mafia are taking firm action against unscrupulous land mafia, namely by dismissing officials who are proven to be involved in land mafia practices. 2) Criminal responsibility for the involvement of National Land Agency (BPN) officials in the land mafia case in South Jakarta, PS was charged with Article 167 of the Criminal Code, Article 263 of the Criminal Code and Article 266 of the Criminal Code. The responsibility of BPN officials for involvement in the land mafia case in South Jakarta is individual responsibility and accountability based on guilt. In this case PS must be personally responsible for the violation he committed because it was deliberately thought with the aim of causing harm.*

*Keywords: Criminal; Land; Responsibility.*

### 1. Introduction

The rapid increase in the need for land, coupled with the limited supply of land at this time, has had a major impact on increasing the value and price of land. This will increase the potential for conflicts and problems related to or caused by

land.<sup>1</sup> Land law in Indonesia was dualistic before the UUPA came into effect, meaning that apart from recognizing the validity of land law, there were those originating from customary law, as well as recognizing regulations regarding land based on western law. After the enactment of the UUPA on September 24, 1960, the period of dual land law prevailing in Indonesia ended, becoming a unification of land law.<sup>2</sup> Regarding land rights, the law also requires rights holders to register their respective lands. Land registration is a very important issue in the UUPA, because land registration is the beginning of the process of producing a proof of ownership of land rights.<sup>3</sup>

The background to the birth of the National Land Agency (BPN) aims to carry out governmental tasks, in accordance with applicable laws and regulations and focuses on carrying out affairs in the agrarian sphere and spatial planning in Indonesia. Based on Regulation Article 2 of the Presidential Regulation of the Republic of Indonesia Number 48 of 2020 concerning the National Land Agency, BPN has the task of carrying out government duties in the land sector in accordance with statutory provisions. Providing legal certainty over the rights of landowners is very important. Legal certainty over land ownership begins with a legal product in the form of a land ownership certificate issued by the National Land Agency. Land registration is carried out to protect the community's rights to their land ownership.<sup>4</sup> Land registration cannot be separated from the role of the Land Deed Official (PPAT) and the National Land Agency (BPN).<sup>5</sup> BPN as the organizer of land registration guarantees the accuracy of land data both physically and juridically on the certificate of land rights, and provides legal certainty by applying the latest principle, so that people will feel safe because the community gives their trust to BPN as the government that guarantees certainty of rights. above ground.<sup>6</sup>

The Land Office is a State Administrative Agency or Officer, having the authority to issue certificates of land rights based on applicable laws and regulations. As a

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<sup>1</sup>Dyara Radhite Oryza Fea. (2018). Guide to Managing Home Land and Permits. Yogyakarta: Legality. p.2

<sup>2</sup>Adrian Sutedi. (2018). Transfer of Land Rights and Registration thereof. Jakarta: Sinar Graphics. p.1

<sup>3</sup>Sharifah Lia. Latifah Hanim. Legal Certainty in Dispute Resolution Overlapping Ownership Certificates (Shm) on Land (Case Study at the Land/Agrarian and Spatial Office of the City of Pontianak). Deed Journal. Vol. 4. No. 1. March 2017: 33 – 36. Unissula. Semarang. p. 34

<sup>4</sup>Daughter. ca. Gunarto. The Effectiveness of Checking Certificates in Preventing Land Disputes in the Process of Transferring Land Rights. Deed Journal. Vol. 5. Number (1) of 2018. p.268.

<sup>5</sup>Eko Puji Hartono. Ahmad Khishni. The Role of PPAT in Making Deeds of Transfer of Rights to Land and/or Buildings of Former Customary Ownership Rights in Relation to Payment of Fees for Acquisition of Land and/or Building Rights. Deed Journal. Vol 5 No 1 March 2018. p.160

<sup>6</sup>Ni Made Rian Ayu Sumardani1. I Nyoman Bagiastra. Legal Responsibilities of the National Land Agency Regarding Discrepancies in Results of Checking Certificates Electronically. Acta Comitas: Journal of Notary Law. Vol. 06 No. 02 August 2021. p.224

State Administrative Agency or Official in carrying out their duties, they may not abuse their authority. Even so, there are still many agrarian problems that occur in the National Land Agency, most of which are about land disputes or ownership of land rights with proof of certificates.<sup>7</sup>

Land registration which is carried out through the National Land Agency is currently prone to land mafia involvement. The land mafia is still rife and disturbing the community. The modus operandi used by the land mafia to control and own land illegally includes falsification of documents, illegal or unlawful occupation (*wilde occupatie*), seeking legality in court, fabricating cases, collusion with officials to obtain legality, corporate crimes such as embezzlement. and fraud, falsification of power of attorney over land rights, buying and selling of land that is carried out as if it were a formal one, and loss of land certificates.

Land mafia practices occur in almost all parts of Indonesia, including in South Jakarta. The rapid development of development in South Jakarta has become a fertile ground for the land mafia to carry out their actions. In various ways and using parties directly related to the land, the land mafia carry out their actions to gain huge profits. Both in land registration activities, land acquisition, implementation of government projects related to land. Various criminal acts related to land are also very common in this area. This condition is the reason for the Regional Police to focus on eradicating the land mafia. Because the land mafia not only harms the community, but in several cases harms the state. One of the BPN officials, PS, allegedly involved in the case of issuing certificates of ownership rights (SHM) related to the complete systematic land registration (PTSL) program. At that time, PS served as Head of PTSL Adjudication at the South Jakarta Administrative City BPN Regional Office.

## **2. Research Methods**

The approach method in this research is a sociological juridical approach. The specification of the research used is descriptive analytical research. Types of data using primary and secondary data. Data collection by interview method and literature study. The data analysis method used is descriptive qualitative analysis.

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<sup>7</sup>Renaldi. Accountability of the National Land Agency for the Emergence of Certificates with Multiple Ownership. Legal Thesis. Year 2020. University of Jember . p. 4

### **3. Results and Discussion**

#### **3.1. Authority of the National Land Agency (BPN) in Efforts to Eradicate the Land Mafia**

Authority is the scope of public legal action, the scope of governmental authority, not only includes the authority to make government decisions (bestuur), but includes authority in the context of carrying out tasks, and granting authority and the main distribution of authority is stipulated in statutory regulations.<sup>8</sup>The National Land Agency is a government agency that is given the authority to take care of land administration. The authority of the National Land Agency (BPN) in granting state land rights is to determine the extent of granting land, BPN's authority in implementing the transmigration program, land redistribution, land consolidation, land registration, and BPN's authority in granting state land rights both ownership rights, usufructuary rights business, building use rights and usufructuary rights.<sup>9</sup>

Several uncovered land mafia cases involved unscrupulous Civil Servants of the Ministry of Attorney/BPN. The land mafia is an evil alliance practice that thrives on low public scrutiny and a lack of law enforcement. The land mafia's methods include conspirating agencies that issue certificates of title, fabricating cases, and pretending to make buying and selling transactions.

The land mafia is a land crime involving a group of people working together to illegally own or control other people's land. The perpetrators used unlawful methods which were carried out in a planned, neat and systematic manner. Illegal land ownership and control often triggers conflicts or disputes that often result in human lives being lost. Weak oversight, law enforcement, and lack of transparency are some of the causes of the land mafia. Apart from that, the community's neglect of the land they own is often used by the land mafia to illegally control their land. Ironically, victims sometimes do not know that their land certificates have changed names because they do not check with the National Land Agency (BPN).<sup>10</sup>

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<sup>8</sup>Ateng Syafrudin. Towards Clean and Responsible State Administration. Journal of Pro Justitia Edition IV T Bandung. Parahyangan University. p. 22.

<sup>9</sup>Petrik P. Authority of the National Land Agency in Granting State Land Rights According to Law Number 5 of 1960 concerning Basic Agrarian Regulations. Journal of Lex et Societatis. Volume V/Number 7/Sep/2017. p.134

<sup>10</sup>Dian Cahyaningrum. Land Mafia Eradication. Brief Info Journal: A Brief Study of Actual and Strategic Issues. Vol. XIII. No. 23/1/Puslit/December/2021. p.2

The rampant mode of land mafia crimes has encouraged the formation of land mafia task forces starting from the central level to the regional level and in collaboration with the relevant Ministries of Art/BPN. According to the ATR Minister/Head of BPN, many cases of land mafia are related to criminal acts of corruption, which involve state assets, BUMN assets, and involve government officials (ASN) in collaboration with certain individuals. that there are elements from BPN who are involved in land mafia practices,<sup>11</sup>

The involvement of officials from the National Land Agency (BPN) in land mafia cases, one of which occurred at the South Jakarta BPN office. Investigators from the General Criminal Investigation Directorate of the Metro Jaya Regional Police (Polda) searched the South Jakarta BPN office on Jalan H Alwi, Tanjung Barat, Jagakarsa, on July 14 2022. The search was carried out after the police arrested a BPN official with the initials PS who was suspected of being involved in the issuance of title certificates (SHM) in the complete systematic land registration program (PTSL). Director of General Criminal Investigation Commissioner Pol Hengki Haryadi said PS was suspected of changing data on land certificates and making certificates with fake data.<sup>12</sup>The police said PS was the mastermind or intellectual actor in the land mafia case in the Jagakarsa area, South Jakarta. PS works with funders or lenders. PS then issues certificates with fake papers and without going through the proper procedures. Finally, PS was removed from his post because he became a suspect in the land mafia case.<sup>13</sup>

This case reflects that the authority of BPN in the process of transferring land rights affects the legal certainty of the right holders. Juridically, authority is the ability granted by laws and regulations to cause legal consequences.<sup>14</sup>Philipus M. Hadjon argued that every government action must be based on legitimate authority. Attributional authority is usually outlined through the distribution of state power by law. The authority of the delegation comes from the delegation of authority in an attributive manner, whereas in the mandate there is no transfer of authority at all.<sup>15</sup>

Based on this theory of authority, the authority possessed by BPN is attributional authority, meaning that this authority is also obtained through law. It appears that the authority obtained by attribution is original, originating from statutory

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<sup>11</sup>Yunawati. Irwan. Eradication of the Land Mafia Using Criminal Law Instruments in Indonesia. *Res Justitia Journal: Journal of Law Science*. Volume 2 Number 1 January 2022. p.114

<sup>12</sup><https://megapolitan.kompas.com/>. accessed on 10 February 2023 at 21.00 WIB

<sup>13</sup><https://www.cnnindonesia.com/> accessed on 10 February 2023 at 21.30 WIB

<sup>14</sup>Indroharto. (1994). *General Principles of Good Government*. Image Adhitya Bakti. Bandung. p. 65.

<sup>15</sup>Philipus M. Hadjon. in I Gusti Agung Dhenita Sari. I Gusti Ngurah Wairocana. *Made Gde Subha Karma Resen. Authority of Notaries and PPATs in the Process of Granting Building Use Rights on Freehold Land*. Acta Comitas. (2018) 1. p. 41

regulations. In other words, government organs obtain authority directly from the editorial board of certain articles in a statutory regulation, the implementation of which authority is fully attributed to the recipient of the authority. BPN has a big role in the transfer of land rights because it has the task of carrying out land registration activities by making deeds as proof that certain legal actions have been carried out regarding land rights which are authentic deed.<sup>16</sup>

The theory of authority has the meaning of authority, rights and powers that are owned to do something. The ability to take certain legal actions (namely actions intended to give rise to legal consequences, and includes the occurrence and disappearance of legal consequences). Rights contain the freedom to do or not take certain actions or demand other parties to take certain actions, while obligations contain the obligation to do or not take certain actions. The Office of the Land Agency is fully given authority in terms of regulation and arrangement of State land as stipulated in the Laws and Regulations. This authority is expected to be one of the supporters for the realization of legal certainty in the process of issuing certificates of land rights in Indonesia.

The authority of the National Land Agency (BPN) in an effort to eradicate the land mafia in South Jakarta can be carried out by taking preventive or repressive measures. Preventive action can be taken by carrying out bureaucratic reform to realize good governance with the principles of good corporate governance (GCG), especially transparency and accountability. The welfare of officials must also be cared for so that their lives are guaranteed and they are not interested in committing evil acts. To support this effort, monitoring and supervising officials must be carried out so that they are on the right track. Supervision and monitoring of BPN workers is due to them issuing land certificates and being the "spearhead" when protecting citizens' rights regarding their land. Meanwhile, repressive efforts to end the land mafia include taking firm action against unscrupulous land mafia members, namely by dismissing officials who are proven to be involved in land mafia practices, as well as reporting them to the police so that officials involved in the land mafia can be subject to criminal sanctions. Criminal sanctions must be given to individuals who are proven to have committed the crime of forging or deceiving, bribing, embezzling, gratification, amassing funds, and others according to the provisions of the applicable law. The criminal sanctions imposed were meant to give a deterrent

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<sup>16</sup>Addien Iftitah. Authorities of Land Deed Making Officials (Ppat) in Making Land Sale and Purchase Deeds and Their Legal Consequences. *Journal Lex Private*. Volume II Number 3. Aug-Oct/2014. p. 52

effect to the perpetrators so they would not act like that again, in addition to protecting the rights of citizens regarding legal ownership of land.<sup>17</sup>

### **3.2. Criminal Accountability for the Involvement of National Land Agency (BPN) Officials in the Land Mafia Case**

The large number of land mafias in Indonesia also greatly influences the legalization system of land certification, due to the recent economic impact. The emergence of brokers is caused by land sellers who do not have buyers or bad advertising. The land mafia still overshadows land management in Indonesia. Various loopholes are exploited for certain purposes, one of which is most commonly found, namely falsification of land ownership documents.<sup>18</sup>

The land mafia is a crime against land and there is involvement of a group of individuals who cooperate with each other in order to own or have power over the land owned by other individuals illegally. The perpetrators used various methods that were against the law and carried out in a planned, coherent, neat manner. Illegal ownership and control of land often creates disputes that often result in the loss of one's life. Control that is still weak, law enforcement is still weak, and lack of transparency is the reason for the emergence of the land mafia to become the power over land illegally. There are also various modus operandi and operational techniques used by land mafia actors in the execution of falsifying documents or letters, citizens are illegitimate or without rights, seeking legality in court, fabricating cases, collusion with officials to obtain legality, corporate crimes such as cheating or embezzlement, falsifying power of attorney over land rights, carrying out land sales that are carried out as if they were formal, as well as the disappearance of land certificates as a mode carried out by various elements at the BPN and there is cooperation with the land mafia. Through various types of modus operandi, the most common mode used by the land mafia is falsifying documents.<sup>19</sup>

The involvement of PS, who is a BPN official in the land mafia crime, is referred to as an intellectual actor in the land mafia case in Jagakarsa, South Jakarta. PS cooperates with several lenders in issuing certificates without proper paperwork. The suspect abused the complete systematic land registration (PTSL) program, but without proper procedures. Related to this abuse of office, PS must be legally responsible. Based on the theory of accountability, the responsibility of BPN officials for their involvement in the land mafia case in South Jakarta is individual

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<sup>17</sup>Ibid..Hal. 52

<sup>18</sup>Wida Wirdaniati. et al. Models of Legalization of Land Certification in Rural Areas and Projections of the Benefit Value of Ownership. Unissula Law Journal. Volume 38 Number 2. p.125

<sup>19</sup>Mega Puspa Kusumajati. Criminal Legal Liability Against Notaries as Land Mafia Personnel. Journal of Education and development. Volume 11 Number 1 January 2023 Edition. p. 50

responsibility and accountability based on fault. In this case PS should be responsible for it alone for violations committed because it is intentionally estimated with the aim of causing harm.

The Director of Criminal Investigation of Polda Metro Jaya Kombes Hengki Haryadi said that his party coordinate with Ditreskrimsus Polda Metro Jaya regarding the application of the Corruption Law in this PS case.<sup>20</sup> The law has accommodated the enforcement of criminal acts committed by the Land Mafia in the Criminal Code, including:

1. Against the crime of entering, occupying the yard of buildings and other people's land, occupying other people's land without rights is regulated in Article 167, Article 389 of the Criminal Code.
2. Land embezzlement is subject to Article 385 of the Criminal Code.
3. Destruction of building goods etc. is regulated in Article 170, Article 406 and Article 412 of the Criminal Code.
4. Forgery of documents or deeds or letters related to land is regulated in Articles 263, 264, 266 of the Criminal Code.<sup>21</sup>

In addition to being regulated in the Criminal Code, there are also articles that can be imposed on the perpetrators of crimes committed by the Land Mafia in the Regulation in Lieu of Law (PERPPU) Number 51 of 1960 concerning Prohibition of Use of Land Without a Permit of the Rightful Person or their Proxy stated in Article 6 Paragraph (1) ). Efforts to deal with criminal acts with non-penal means focus more on preventive or preventive properties. Based on this, it can be seen from the point of view of criminal politics both macro and global, non-penal efforts have and occupy key and strategic positions in all criminal political efforts.<sup>22</sup> Regarding the land mafia suspect, PS was charged under Article 167 of the Criminal Code, Article 263 of the Criminal Code and Article 266 of the Criminal Code.<sup>23</sup>

Criminal liability is a condition that refers to three abilities. The first ability is that the doer is aware of the act and its consequences. The second ability is that the perpetrator realizes that what he is doing violates public order and the last ability

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<sup>20</sup>[www.cnnindonesia.com/](http://www.cnnindonesia.com/). at 17.00 WIB

<sup>21</sup>Pearl Rest. Non-Penal Policy for Handling Crimes Committed by the Land Mafia. *Lex Lata: Scientific Journal of Law*. February 2022. p. 19

<sup>22</sup>Barda Nawawi Arief. (2011). *Criminal Law Policy Development of the Drafting of the New Criminal Code*. Jakarta: Kencana p. 46.

<sup>23</sup>[www.cnnindonesia.com/](http://www.cnnindonesia.com/) accessed on February 8, 2023. At 17.00 WIB



is that when the perpetrator commits the act he is free of will.<sup>24</sup> These three skills are cumulative. That is, a person is considered irresponsible if only one responsible skill is not fulfilled. If someone commits a crime, that person can be subject to criminal liability and can ultimately be sentenced.

#### **4. Conclusion**

The authority of the National Land Agency (BPN) in an effort to eradicate the land mafia in South Jakarta can be carried out through preventive and repressive efforts. Preventive action can be taken by carrying out bureaucratic reform to realize good governance with the principles of good corporate governance (GCG), especially transparency and accountability. The welfare of officials must also be cared for so that their lives are guaranteed and they are not interested in committing evil acts. To support this effort, monitoring and supervising officials must be carried out so that they are on the right track. Meanwhile, repressive efforts to end the land mafia include taking firm action against unscrupulous land mafia members, namely by dismissing officials who are proven to be involved in land mafia practices, as well as reporting them to the police so that officials involved in the land mafia can be subject to criminal sanctions. 2) Criminal responsibility for the involvement of National Land Agency (BPN) officials in the land mafia case in South Jakarta, PS was charged with Article 167 of the Criminal Code, Article 263 of the Criminal Code and Article 266 of the Criminal Code. Based on the theory of accountability, the responsibility of BPN officials for involvement in the land mafia case in South Jakarta is individual responsibility and accountability based on guilt.

#### **4. References**

##### **Journals:**

Addien Iftitah. Authorities of Land Deed Making Officials (Ppat) in Making Land Sale and Purchase Deeds and Their Legal Consequences. *Journal Lex Private*. Volume II Number 3. Aug-Oct/2014.

Ateng Syafrudin. Towards Clean and Responsible State Administration. *Journal of Pro Justisia* Edition IV. (2000). Bandung: Parahyangan University

Dian Cahyaningrum. Land Mafia Eradication. *Brief Info Journal: A Brief Study of Actual and Strategic Issues*. Vol. XIII. No. 23/I/Puslit/December/2021.

Eko Puji Hartono. Ahmad Khishni. The Role of the PPAT in Making Deeds of Transfer of Rights to Land and/or Buildings of Former Customary

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<sup>24</sup>Eddy OS Hiariej. (2016). *Criminal Law Principles*. Yogyakarta: Atma Light Pustaka. p.155

Ownership Rights in Relation to Payment of Fees for Acquisition of Land and/or Building Rights. Deed Journal. Vol 5 No 1 March 2018.

Mega Puspa Kusumajati. Criminal Legal Liability Against Notaries as Land Mafia Personnel. Journal of Education and development. Volume 11 Number 1 January 2023 Issue.

Ni Made Rian Ayu Sumardani<sup>1</sup>. I Nyoman Bagiastra. Legal Responsibilities of the National Land Agency Regarding Discrepancies in Results of Checking Certificates Electronically. Acta Comitatus: Journal of Notary Law. Vol. 06 No. August 02, 2021.

Petrik P. Authority of the National Land Agency in Granting State Land Rights According to Act No. 5 of 1960 concerning Basic Agrarian Regulations. Journal of Lex et Societatis. Volume V/Number 7/Sep/2017.

Philipus M. Hadjon. in I Gusti Agung Dhenita Sari. I Gusti Ngurah Wairocana. Made Gde Subha Karma Resen. Authority of Notaries and PPATs in the Process of Granting Building Use Rights on Freehold Land. Acta Comitatus. (2018) 1.

Daughter. ca. Gunarto. The Effectiveness of Checking Certificates in Preventing Land Disputes in the Process of Transferring Land Rights. Deed Journal. Vol. 5. Number (1) of 2018..

Renaldi. Accountability of the National Land Agency for the Emergence of Certificates with Multiple Ownership. Legal Thesis. year 2020. University of Jember .

Pearl Rest. Non-Penal Policy for Handling Crimes Committed by the Land Mafia. Lex Lata: Scientific Journal of Law. February 2022.

Sharifah Lia. Latifah Hanim. Legal Certainty in Dispute Resolution Overlapping Ownership Certificates (Shm) on Land (Case Study at the Land/Agrarian and Spatial Office of the City of Pontianak). Deed Journal. Vol. 4. No. 1. March 2017: 33 – 36. Unissula. Semarang.

Wida Wirdaniati. et al. Models of Legalization of Land Certification in Rural Areas and Projections of the Benefit Value of Ownership. Unissula Law Journal. Volume 38 Number 2.

Yunawati. Irwan. Eradication of the Land Mafia Using Criminal Law Instruments in Indonesia. Res Justitia Journal: Journal of Law Science. Volume 2 Number 1 January 2022.

**Books:**

Adrian Sutedi. (2018). Transfer of Land Rights and Registration thereof. Jakarta: Sinar Graphics.

Barda Nawawi Arief. (2011). Criminal Law Policy Development of the Drafting of the New Criminal Code. Jakarta: Kencana.

Dyara Radhite Oryza Fea. (2018). Guide to Managing Home Land and Permits. Yogyakarta: Legality.

Eddy OS Hiariej. (2016). Criminal Law Principles. Yogyakarta: Atma Light Pustaka

Indroharto. (1994). General Principles of Good Government. Bandung: Citra Adhitya Bakti.

**Regulation:**

The 1945 Constitution of the Republic of Indonesia.

Civil Code

Act No. 5 of 1960 concerning Basic Agrarian Regulations

Government Regulation Number 24 of 1997 concerning Land Registration.

Regulation of the Head of the National Land Agency of the Republic of Indonesia No. 3 of 2011 concerning Management of the Study and Handling of Land Cases.

Regulation of the President of the Republic of Indonesia Number 48 of 2020 concerning the National Land Agency

Government Regulation Number 24 of 2016. Amendment to Government Regulation Number 37 of 1998 concerning Regulations for the Position of Officials Making Land Deeds.

Supreme Court Regulation Number 6 of 2018 Concerning Guidelines for the Settlement of Government Administrative Disputes.

Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency of the Republic of Indonesia Number 21 of 2020 concerning Handling and Settlement of Cases and jurisprudence.

Government Regulation of the Republic of Indonesia Number 18 of 2021  
concerning Management Rights, Land Rights, Flats Units, and Land  
Registration

**Internet:**

<https://megapolitan.kompas.com/>.

[www.cnnindonesia.com/](http://www.cnnindonesia.com/)