

Notary's Responsibility In Making A Deed Of Grant That Is Cancelled Due To Legal Defects

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Abstract. *This study analyzes the Village Treasury Land (TKD) dispute between the Sobokerto Village Government and the Indonesian Air Force (TNI-AU) in Ngemplak District, Boyolali Regency, which gave rise to dual claims over land that had been managed by the community for decades as a village asset but was later claimed as part of the strategic area of Adi Soemarmo Air Base. The dispute resulted in legal uncertainty regarding the land's status, overlapping ownership documents, reduced access for residents to cultivated land, and the weakening of the function of village assets as a supporter of Village Original Income. The study used a juridical-empirical method with a descriptive qualitative research type through a legislative and conceptual approach, with primary and secondary data obtained through in-depth interviews and literature studies, then analyzed descriptively-analytically. The results of the study indicate that the legal status of the disputed land is in a dualism of public legitimacy: the Village Government bases its claim on historical-factual control, recording of village assets, and the social function of TKD for the welfare of residents, while the TNI-AU positions it as a defense area controlled by the state for the sake of national security. This dualism is reinforced by the weak demarcation of boundaries and formal evidence of TKD in the past, thus triggering overlapping documents. The main obstacles include disorderly land registration administration, differences in ownership history that are not jointly verified, data asymmetry across agencies, the dominance of a legal-formal approach that ignores the social function of land, and unequal civil-military relations; within the framework of the Theory of Legal Certainty and Progressive Law Theory, these findings emphasize the need for integrated land administration arrangements, collaborative verification of ownership history, and resolution mechanisms that are not merely formalistic so that legal certainty and socio-economic protection of village communities can be restored.*

Keywords: *Co-Defendant; Deed Of Gift; Legal Protection; Liability; Notary.*

1. Introduction

Land is a strategic resource that not only has economic value but also determines social structure, the sustainability of community life, and the legitimacy of the state's authority to regulate its use. In national agrarian law, the relationship between land rights and land ownership is crucial.

individual/communal and public interests are linked through the principle of the social function of land rights, so that every control and use of land should accommodate broader interests, not just the interests of the claim holder.¹ At the village level, land is an important instrument for financing development and the welfare of residents, because village assets according to the Village Law can include village treasury land (TKD) which is managed to support the interests of the village government and the community.¹ Its management is also emphasized through a village asset administration framework that demands orderly recording, utilization, security, and certainty of asset status.²

However, in practice, TKD is often in a vulnerable position: weak administration, non-uniformity of data across agencies, and delays in confirming rights/certification open up space for claims by other parties or changes in function that are not in accordance with their intended use.³ This vulnerability becomes even more complex when it intersects with strategic state interests, such as defense/security needs, which often require land ownership as part of state assets. While the land registration regime is intended to provide legal certainty and protection for entitled parties, it still allows for protracted disputes to arise when documents, ownership histories, and institutional claims are not reconciled in an accountable manner.⁴

¹ Triana Rejekiningsih, "The Principle of the Social Function of Land Rights in a State Based on Law (A Review of Theory, Jurisprudence and Its Application in Indonesia)," *Yustisia* Vol. 5 No. 2 (2016).

² Law of the Republic of Indonesia Number 6 of 2014 concerning Villages.

³ Regulation of the Minister of Home Affairs Number 1 of 2016 concerning Village Asset Management.

⁴ Vivilia Agnata Mudi & Nuragifah, "Analysis of Legal Certainty on the Ownership Status of Village Treasury Land as a Village Government Asset," *RIO Law Journal* Vol. 6 No. 1 (2025).

This situation is reflected in the TKD dispute between the Sobokerto Village Government and the Indonesian Air Force in Ngemplak District, Boyolali Regency. This dispute is characterized by overlapping claims to land that has historically been used as TKD and supports the residents' economic activities, but has now been linked to the strategic interests of the air base area. In such a situation, the dispute is not only understood as a question of "ownership," but also concerns the certainty of the status of village assets and governance.

2. Research Methods

Normative legal research; approach methods: statutory approach, conceptual approach, and case approach; research specifications: descriptive-analytical; data collection method: literature study (primary, secondary, tertiary legal materials); data analysis method: normative qualitative analysis with descriptive-analytical reasoning.⁵

3. Results and Discussion

3.1. Legal Status of Land Ownership in Dispute Between the Sobokerto Village Government and the Indonesian Air Force

The research results show that the legal status of the disputed land is essentially in a conflict between state control of the land for public interest and land management by the village government as a village asset (TKD). On the one hand, village treasury land is part of the village assets that are normatively required to be administratively orderly and must be secured; even regulations for managing village assets Encourage village land to be certified in the name of the village government to provide legal certainty. However, in cases involving defense institutions, land may be claimed as part of a strategic area requiring spatial control for operational safety and security. Such status conflicts typically cannot be resolved solely through historical narratives or factual mastery, as the certainty of land status in a positive legal system relies on physical data (boundaries, location, area) and legal data (rights status, rights holders, encumbrances) integrated into the land registration system.⁶

From a legal certainty perspective, the legal status of land must be verifiable and verifiable by any party through land administration mechanisms. While certificates are, in principle, strong evidence, the Indonesian land registration

⁵ Sumardjono, MSW (2016). The legal dimensions of the notary position in the national legal system. *Jurnal Rechtsvinding*, 5(1).

⁶ Sulis Setyowati, Eliana, Reni Suryani, Dian Ekawati, and Naib, 2022, "Initial Measurement of Legal Certainty Over Land", *Bhakti Hukum: Journal of Community Service*, 1(1), pp. 24–26.

system does not adhere to a purely positive system; it adheres to a negative publication system (with positive elements), meaning the material accuracy of the data contained in the certificate is not guaranteed by the state and can still be challenged as long as there is stronger evidence. Consequently, legal certainty in land disputes is not simply a matter of "who holds the certificate" or "who has physical control," but rather the extent to which the data used by the state in registration (physical-juridical) truly points to the same area, and the extent to which verification procedures are carried out carefully so that the data can be accounted for.⁷ This situation is important to bring to the Sobokerto case, because when the land area is not yet "locked" spatially (boundaries-location-area) and legally (basis of rights/law basis), each party can defend its claim and legal certainty is delayed.

The legal status of disputes involving TKD is also complicated by normative ambiguity regarding the type of land rights most appropriate for village treasury land and the status of the subject of these rights. Research in the *Pandecta Research Law Journal* shows that the provisions for village land certification "in the name of the government" The "village government" is intended to guarantee legal certainty, but it raises conceptual problems: what type of rights are appropriately attached to the TKD, and whether "village government" is interpreted as an institution or an official. The article concludes that the closest right to village treasury land is the right to use over land with management rights, and its registration must be carried out in accordance with the framework of land registration regulations and related agrarian regulations.⁸ The implication is that the village's claim to the new TKD will be strong in terms of legal certainty if: (i) the rights status is clear, (ii) the subject of the rights is correct (village government institution), and (iii) the area is mapped and registered with correct legal physical data.

From a technical registration perspective, certainty of land status requires that land parcels be ensured through accurate measurement and mapping. Journal literature on land registration emphasizes that land registration is a series of activities that include collecting, processing, recording, presenting, and maintaining physical and legal data in the form of maps and lists, including the issuance of proof of rights. In this context, a certificate contains physical data (location, boundaries, area) and legal data (land status, rights holders, rights of others, and encumbrances) and is therefore an important instrument of legal

⁷ Desi Apriani and Arifin Bur, 2021, "Legal Certainty and Legal Protection in the Land Registration Publication System in Indonesia", *Jurnal Bina Mulia Hukum*, 5(2), pp. 233–236

⁸ Bagus Oktafian Abrianto and Muhammad Azharuddin Fikri, 2021, "Status of Village Treasury Land Rights and Registration Procedures According to Land Administration Law", *Pandecta Research Law Journal*, 16(2), pp. 205–207

certainty, but only to the extent that the data included is accurate and can be used to restore boundaries if necessary.⁹ With this framework, the Sobokerto dispute at the “legal status” level is best understood as a problem of the incomplete locking of physical-juridical data in the same area, so that the TKD (village) claim and the strategic area claim (TNI-AU) stand on a non-single reference.

Furthermore, ensuring land status certainty in the context of document conflicts is further complicated by the challenges faced by accelerated land registration programs (e.g., PTSL) in Indonesia. A *Mimbar Hukum* article explains that while the comprehensive systematic land registration (PTSL) program aims to create a single map and provide legal certainty, its implementation still faces obstacles from land offices, participants, and village/sub-district governments.

While providing certainty to participants, various obstacles indicate that legal certainty is highly dependent on the quality of physical and legal data verification and the support of local officials.¹⁰ This is relevant to the Sobokerto case because it shows that “legal certainty” is not a slogan, but rather an outcome that is largely determined by the quality of measurement/mapping, the accuracy of documents, and data synchronization across parties.

The “unfinal legal status” of disputes that give rise to overlapping claims is also frequently seen in the phenomenon of overlapping certificates or proof of ownership. The *Notarius* article emphasizes that overlapping land ownership can arise from a lack of thorough verification of documents prior to certificate issuance, minimal coordination between local governments and land offices, and weak ownership validation, which weakens legal certainty and increases conflict.¹¹ If the principle of caution in document verification and physical-legal data validation is not strictly implemented, then the “certainty” produced by formal documents remains easily questioned, and disputes can move from the administrative sphere to the litigation sphere.

In cases involving defense institutions, legal status is also influenced by the land's status as part of State Property (BMN) or agency assets. The article “The Face of the Law” (air base land asset case) shows that disputes over air base land assets can be protracted because land claimed by defense institutions is positioned as

⁹ Boedi Harsono, 2008, *Indonesian Agrarian Law: History of the Formation of the Basic Agrarian Law, Contents and Implementation*, Djambatan, Jakarta, p. 635

¹⁰ Isdiyana Kusuma Ayu, 2019, “Legal Certainty of Land Ownership Through Complete Systematic Land Registration in Batu City”, *Mimbar Hukum*, 31(3), pp. 338–351.

¹¹ Legal Certainty and Protection for Owners of Overlapping Land Rights Due to the Issuance of PTSL Certificates”, *Notarius*, 18(1), pp. 153–155

BMN, which cannot be removed from state records without a legally binding decision and permission from the relevant authorities. This often conflicts with long-standing community physical control.¹² Although the context of the case is in a different location, the general logic is relevant: land disputes with the Indonesian Air Force tend to involve clashes between claims to state assets and control/utilization by communities/villages, so that the resolution of the legal status...

usually requires strong formal proof and confirmation of boundaries recognized in land administration.

Thus, the legal status of the Sobokerto disputed land can be analytically formulated as follows. First, the legal status remains in a “non-singular” state when two public claims exist without a single reference area (map) and the same rights basis. Second, legal certainty demands integrated verification: (i) confirmation of boundaries, location, and area through accurate measurement/mapping; (ii) synchronization of legal data (rights basis/history) on the same area; and (iii) determination of the appropriate rights status for TKD (for example, the right to use framework above the HPL for village treasury land) so that village claims can be formally tested. Third, because Indonesia adheres to a negative publication system, any status that is not supported by solid physical-legal data will always be open to challenge; therefore, the legal status is only truly “certain” if the results of the verification and confirmation of boundaries are outlined in an accountable administrative document and become a single reference across agencies. Fourth, in disputes involving strategic areas, stable legal status usually depends on the synchronization of land administration with state/defense asset administration, without which, claims to “state assets” and claims to “village assets” will continue to be at odds, while the community is in the most impacted position due to uncertainty about access and utilization.

3.2. Obstacles Causing Overlapping Documents for Land Ownership in Dispute Between the Sobokerto Village Government and the Indonesian Air Force

Overlapping land ownership documents in disputes such as the Sobokerto–TNI-AU dispute generally do not arise from a single cause, but rather are the accumulation of administrative-technical land constraints, disharmony in regulations and databases across agencies, and social factors that weaken the quality of data verification. At the land administration level, overlapping is often initiated by weak “parcel locking,” namely when land parcels are not mapped consistently in registration maps, allowing for the issuance of more than one

¹² Firman Wijaya, Abdul Atik, and Diah Turis Kaemirawati, 2022, “Legal Efforts to Resolve Disputes over State Property in the Form of Air Base Land Assets”, *Wajah Hukum*, 6(1), p. 71.

claim/document for the same parcel or overlapping parcels. Bhumi's research shows that factors causing overlapping certificates include land offices. not following procedures according to provisions, absence/incompleteness of registration maps as base maps, applicants not understanding land boundaries, and weak administrative order at the village level which is the source of initial information.¹³ If the fields are not "locked" on a complete registration map, then the physical data (location-boundaries-area) and legal data (status/rights holder/burden) do not meet on the same field; the result is a document that formally appears valid, but spatially overrides another document.

The next major obstacle is the use of more than one base map and the non-uniformity between maps (multiple base maps). Overlapping can occur because the registration map has not been formed or is incomplete, and even one area can be depicted on more than one registration map, while the maps used in registration can come from various sources (registration maps, PRONA/mass certificate/adjudication results maps, tax agency/SISMIOP maps, city planning maps, village maps) which are not uniform with each other.¹⁴ This "multi-map" situation obscures the location of registered parcels and opens up opportunities for overlap, especially if the measurement and boundary designation process is not conducted rigorously and participatory. In the Sobokerto context, this issue is particularly relevant because TKD disputes typically hinge on village administration and historical land use records, while defense agency claims may rely on internal maps of the area. If both maps are not linked to the same registration map, the resulting documents will contradict each other.

Besides the mapping issue, another crucial obstacle is the violation of verification procedures in the land registration document issuance process, particularly in the accelerated certification program. The overlapping of PTSL certificate issuance confirms that overlapping issues often arise due to procedural violations in certificate issuance, resulting in conflicts between new certificate owners and the relevant authorities.

who already have proof of previous control/ownership. This article also recommends strengthening data verification before publication, routine audits, and utilizing GIS for mapping/data management to avoid future conflicts. This pattern explains why overlapping documents are not solely the fault of the

¹³ Anggiat Perdamean Parsaulian and Sudjito, 2019, "The Problem of Overlapping Land Ownership Certificates in Banjarbaru City (Decision Number: 24/G/2014/PTUN.BJM)", *BHUMI: Jurnal Agraria dan Pertanahan*, Vol. 5, No. 1, pp. 129–135.

¹⁴ Iryuanda Zarina, 2025, "Legal Certainty Regarding Overlapping Land Title Certificates (Case Study of PT. INALUM vs. the Lalang Village Community, Batu Bara Regency)", *Jurnal Notarius (UMSU)*, Vol. 11, No. 2, pp. 66–74

applicant, but can stem from weaknesses in the administrative verification system, especially when acceleration targets encourage less thorough processes.

The next obstacle is field constraints that prevent optimal physical and legal data verification. PTSL shows that the implementation of systematic registration is not always smooth due to numerous obstacles faced by officers in the field, including land parcels that do not meet the requirements for certificate issuance, land parcels still in dispute/proceedings, unknown/unclear/unavailable subjects, and unclear land boundaries.¹⁵ These obstacles explain why, under certain circumstances, documents can be issued without adequate dispute resolution or boundary confirmation, leading to overlapping issues at a later stage. In the Sobokerto dispute, the factors of "unclear land boundaries" and "disputed areas" are directly related to the overlap between TKD claims and strategic area claims.

Human error and bad faith factors also consistently appear in overlapping studies. Officer/employee factors (human error) and possible bad faith from applicants are causes of overlap, along with other variables such as regional division/expansion and improper village/sub-district administration. Bhumi's study also exemplifies cases of improper issuance procedures, including applicants' absence during measurement or inadequate authorization procedures, which ultimately lead to areas not being properly verified. In the Sobokerto configuration, these factors can appear at two levels simultaneously: the village level (asset archives, boundary data, utilization history) and the agency level (area maps, asset records,

or internal administrative documents). When one level works with inadequate verification standards, document overlap becomes easier to occur.

An often-overlooked structural obstacle is regulatory disharmony and sectoral egos, which can lead to a single land object being claimed/administered by more than one regime. Land rights regulation continues to pose problems due to incompatible sectoral/departmental/regional activities, and overlapping regulations can arise due to clashing agency authorities and differences in central and regional policies. The article emphasizes the importance of a clear RTRW (Regional Spatial Plan) as the basis for issuing legal products (location permits, utilization permits), as well as the importance of an accurate and transparent database. In the Sobokerto dispute, this disharmony is evident when the village asset regime (TKD) clashes with the defense regime (strategic areas). Without a binding, cross-agency synchronization mechanism based on a single map,

¹⁵ Isdiyana Kusuma Ayu, 2019, "Legal Certainty of Land Ownership through Complete Systematic Land Registration in Batu City," *Mimbar Hukum*, Vol. 31, No. 3, pp. 338–351

documents will continue to be produced "as if" the objects are different, even though they are in fact the same area.

Another specific obstacle to the Village Land Acquisition (TKD) is the weak governance of village asset administration and the need for harmonization and coordination across government levels. The RIO Law Journal article emphasizes the recommendation that village governments immediately certify unregistered village treasury land through the national program and the need for increased coordination and harmonization of regulations to avoid overlapping regulations that could confuse village governments.¹⁶ This means that, in the TKD aspect, overlapping documents often stem from the TKD's status not being secured (not yet registered/certified). Therefore, when claims from other parties arise, the village lacks "strong formal evidence" to immediately secure the status. This situation is made even more likely when village archives are based on custom, while formal verification requires integrated registration data.

In the social aspect, overlapping documents are triggered by the dynamics of TKD utilization that deviates or changes its function without orderly procedures, so that the history of use becomes complex and difficult to verify. The Lex Renaissance study shows that Village Treasury Land is state land handed over to the village to be used for the benefit of the village and becomes a potential source of income, however in practice there can be misuse of the TKD function involving various parties, so that the village government needs to act decisively and maintain the continuity of TKD according to procedures.¹⁷ When the use of TKD changes function or is left without strong administrative security, the history of ownership becomes "layered" and produces informal documents/rights that conflict with village asset records.

From the overall description, the most dominant obstacles causing overlapping documents in the Sobokerto–TNI-AU dispute can be mapped into seven clusters:

1. absence/incompleteness of registration maps and weak field locking;
2. the use of many non-uniform base maps (registration maps, village maps, tax maps, city planning maps) which results in a non-singular location-boundary-area;

¹⁶ Lex Journalism, 2013, "Disharmony Legislation in the Agrarian Sector", *Lex Jurnalica*, Vol. 10, No. 3, pp. 135–136

¹⁷ Fattahillah Fahmi, 2016, "Misuse of Village Treasury Land in Banguntapan District, Bantul Regency, Special Region of Yogyakarta", *Lex Renaissance*, Vol. 1, No. 2, pp. 141–151

3. violation of procedures and lax verification, especially in accelerated certification schemes;
4. field constraints (unclear boundaries, unclear subjects, disputed areas) that hinder data validation;
5. human error, bad faith, and weaknesses in village/sub-district administration which are the initial data input;
6. disharmony in sectoral policies and clashes of authority that result in one object being managed by two regimes without synchronization; and
7. weak security of TKD (certification and supervision of utilization) which makes the status of village assets vulnerable when faced with claims from other institutions.

4. Conclusion

Conclusion First, the legal status of the disputed land ownership/control between the Sobokerto Village Government and the Indonesian Air Force (TNI-AU) is not yet final because the object is at the intersection of two public interest regimes, namely the village asset regime (TKD) and the national defense regime. Legal certainty over the land plot cannot be enforced as long as the physical data (location, boundaries, area) and legal data (rights status, rights basis, rights holders, burdens) are not locked in the same registration reference and can be tested. In the Indonesian land registration system which is characterized by negative publication (with positive elements), formal documents can still be challenged if the verification of physical-legal data is not solid, so that confirmation of status in cases such as Sobokerto requires the integration of registration maps, cross-agency document verification, and the determination of accountable land boundaries. Second, the main obstacles causing overlapping land ownership documents are structural and administrative-technical in nature. Overlaps are triggered by incomplete registration maps and weak land parcel locking, the use of multiple, non-uniform base maps, violations of verification procedures in certificate issuance (especially in accelerated schemes), field obstacles such as unclear boundaries and disputed land parcels, as well as human error and bad faith. Furthermore, disharmony in sectoral policies and clashes of authority between institutions increase the likelihood of a single land object being claimed under two different administrative bases. In the context of the Village Land Management System (TKD), weak security of village assets (inventory, certification, utilization supervision) increases the vulnerability of villages when faced with claims from other institutions, so that overlapping documents arise not only from a "lack of village evidence" but also from the failure to synchronize spatial-juridical data across agencies. Suggestion: First, the

ATR/BPN needs to prioritize resolving the Sobokerto dispute through measurement and remapping that will produce a single field map and participatory confirmation of boundaries, location, and area, involving the Village Government, community representatives, and representatives of the Indonesian Air Force (TNI-AU). The measurement must be followed by a matching of physical and legal data (rights, ownership history, registration data) so that the results can be verified and become a single reference, thus eliminating the possibility of overlapping documents. Second, the Sobokerto Village Government, together with the Boyolali Regency Government, needs to strengthen the security of village assets/TKD by organizing TKD archives (inventories, utilization histories, lists of cultivators, boundaries, and tax documents) and immediately submitting registration/certification requests for unregistered TKD in accordance with land administration procedures and village asset management regulations. This step is crucial to increase legal certainty for village assets and prevent future overlapping documents.

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