

JURIDICAL REVIEW OF DEEDS SHOWING THE TRANSFER OF LAND RIGHTS IN TULUNGAGUNG

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ABSTRACT

In transferring land rights, legal practice often needs to be more consistent. Therefore, a problem arises regarding the transfer of land rights; it is necessary to go through several procedures and factors that are the basis for consideration. Referring to this, the procedure for the Transfer of Land Rights Before and After the Entry into force of Government Regulation Number 24 of 1997, the implementation based on PP No.24/1997 in Tulungagung Regency was carried out mostly because of the ease of requirements while PP No.10/1961 the basic legal provisions of its implementation were felt not enough to facilitate the implementation of registration in a short time and the regulations are still considered to be very rigid, in this study using the Qualitative method with a Sociological Juridical approach which was obtained directly in the field by conducting interviews or interviews with the residents involved in carrying out the land registration process, 20 Notary/PPAT, and with officials at the Tulungagung Regency National Land Agency Office, for the completion of the Making of the Deed Designating the Deed of Transfer of Rights previously carried out by making a Statement on the Deed of Risks Against the Deed Made by the local District Head, and that the Making of the Deed Designating the Deed of Transfer of Rights earlier in 2023 is no longer enforced to conform to every existing regulation and so as not to impede the Complete Systematic Land Registration program, because there are still many people who are still unfamiliar with the importance of registering land rights and so that inconsistencies in legal practice do not occur, therefore it is necessary to increase procurement Legal counseling, especially regarding land registration which is balanced with cooperation between the Land Office and officials at both the sub-district and village levels, needs to be improved and fostered. Because there are still many people who are still unfamiliar with the importance of registering land rights so that inconsistencies in legal practice do not occur; therefore, it is necessary to increase procurement Legal counseling, especially regarding land registration which is balanced with cooperation between the Land Office and officials at both the sub-district and village levels, needs to be improved and fostered. Because there are still many people who are still unfamiliar with the importance of registering land rights so that inconsistencies in legal practice do not occur; therefore, it is necessary to increase procurement Legal counseling, especially regarding land registration which is balanced with cooperation between the Land Office and officials at both the sub-district and village levels, needs to be improved and fostered.

Keywords: Appointment Deed, Transfer of Rights, Land Registration, Land Deed

I. INTRODUCTION

The land is part of the earth's surface in the form of a unit area which certainly has certain limits that on the existing land rights exist on the land, whether owned individually or as a legal entity. The land is a means that can bind unity within Indonesian society to live in society, nation and state. Provisions for land registration are contained in the Basic Agrarian Law (UUPA) contained in Article 19. This rule was then further regulated through implementing regulations, namely Government Regulation Number 10 of 1961, which was later replaced by Government Regulation Number 24 of 1997, the presence of regulations. This executor is responding to the need for legal certainty for land rights owners. (Kaunang, 2016)

The form and proof of ownership of land rights in the country of Indonesia are very, very diverse; this happened because Indonesia became independent in 1945 and had just had a national land law in 1960, which was regulated in Law Number 5 Year 1960 concerning the Basic Agrarian Regulations known as the Basic Agrarian Law (UUPA). Therefore, there is still much old evidence of ownership of land rights that are still being used by Indonesian people, namely what is called Letter C Village. In assessing the validity of Letter C, Villages need to be based on the legal requirements for decisions on authorities, procedures, and objects that are appropriate and need to be based on the UUPA, Government Regulations on Land Registration, and related Laws. (Sadjarwo, 2020)

In state law, the protection of human rights is required to be guaranteed by the state, one of which is the right to land ownership which must be clear to the owner, and that is, every citizen has the right to have the same position before the law, and before the Government, this is one of the principal consequences of sovereignty. The people and the principle of the rule of law. Certainty, order and legal protection, among others, indicate that in the law of traffic in social life, evidence is needed to determine a person's rights and obligations as a subject in society. In the life of society, relations between people there will always be rights and obligations in it; the exercise of rights and obligations can often lead to violations. (Retno Sari Dewi, 2016)

Provisions for land registration in the Basic Agrarian Law (UUPA) are contained in Article 19. This rule was then regulated further through implementing regulations, namely Government Regulation Number 10 of 1961, which was later replaced by Government Regulation Number 24 of 1997, the presence of implementing regulations. This is in response to the need for legal certainty for land rights owners. Land registration has the purpose of being held, which is very important, namely to guarantee legal certainty; land registration is carried out to meet the needs of society and the Government. And with Government Regulation Number 10 of 1961, for the first time, Indonesia had an institution for land affairs,

Its relation to the transfer of land rights can cause land rights to be transferred from one person to another. Therefore, this transfer is a legal act deliberately carried out to transfer land rights from the transferor to the transferee. Sale and purchase transactions for a plot of land are common legal actions and are often carried out by the community in transferring land rights or control over land. Those relating to authentic deeds and the authority of a notary as a public official who has the authority to do authentic deeds can be seen in Law No. 30 of

2004 concerning the Office of a Notary Public, namely preamble point b, it is stated that in order to guarantee legal certainty, order and legal protection, authentic written evidence is needed regarding the circumstances,(Surjanti, 2016)

The Deed made by the PPAT serves as a means of proving that a sale and purchase transaction has been carried out. Then the sale and purchase can still be proven with other means of proof. However, in the land registration system, according to Government Regulation No. 24/1961, which has now been amended by PP No. 24 of 1997, sale and purchase registration can only be carried out with a deed made by PPAT as proof that a person who has transferred rights without proof with a deed made by PPAT will not be able to register with the National Land Agency to obtain a certificate even though the sale and purchase are legal.(Muhammad Arafah Sinjar, 2020)

As is often known, in matters of agrarian law, there are often concrete cases where legal practitioners have mastered legal principles, but errors in applying the law arise due to special circumstances. For this reason, further studies are needed about the extent of the implementation of the sale and purchase of land that has not been certified and the registration of the land at the Tulungagung District Land Office along with what obstacles occur in its implementation so that the problem arises, namely regarding the Pointing Deed on the Previous Deed made by the PPAT or PPATS in Tulungagung Regency. Therefore, the author intends to raise this research with the title Juridical Review of Designating Deeds Against the Transfer of Land Rights in Tulungagung Regency.

II. RESEARCH METHODS

The approach method used in this research is Juridical Sociology which is a research approach to legal facts in the field to find out the Process of Implementing Land Registration and the basis for consideration of the existence of Deeds Pointing to the Transfer of Land Rights in Tulungagung Regency.

1. Sources of data obtained from this research are as follows:

a. Primary data

This is data obtained directly in the field by conducting interviews or interviews with residents involved in carrying out the Land Registration Process, 20 Notaries/PPATs, and officials at the Tulungagung Regency National Land Agency Office who were resource persons as subjects in this research. Variations of questions may be adapted to the situation during the ongoing question-and-answer process used in this study. The tool used in the interview is a list of questions prepared in advance so that the interview stays within the problem to be studied.

b. Secondary Data

Secondary materials are all legal publications that are official documents. Includes textbooks, legal dictionaries, legal journals, as well as legally binding materials, namely:

a) Code of Civil Law;

b) Law Number 5 of 1960, Concerning Basic Agrarian Regulations;

c) Government Regulation Number 24 of 1997, Concerning Land Registration.

2. Types of Data and Data Analysis Techniques

The data obtained will be processed and re-analyzed so that truths are obtained to answer the problem regarding the Deed Appointing Transfer of Land Rights. The data were analyzed qualitatively, then presented as a statement description. Then from this analysis, conclusions will be drawn using the inductive method, namely describing the material from the general to the specific results of the analysis.

III. RESULTS AND DISCUSSION

1. Procedure for Transfer of Land Rights Before and After the Enactment of Government Regulation No. 24 of 1997

In Indonesia, land registration took place in several periods, namely: Before the UUPA and PP No. 10/1961 and after the UUPA and PP No. 10/1961 came into effect, PP No. 24/1997 which adopted a more pragmatic principle and a wider scope in carrying out conversions and also what rights can be proven to process land registration. (Adhim, 2010) **Before** No. 24/1997, which first came into force, namely Government Regulation No. 10 of 1964 (PP No.10/1961) in the world of land, PP No.10/997 concerning Land Registration came into force on September 24, 1961, in Java and Madura and other areas followed suit since March 26, 1962. (P. Parlindungan, 1990; 65-66)

To guarantee legal certainty, therefore Article 19, paragraph 2 states that land registration is carried out by implementing the following policies:

1. Measuring, mapping and bookkeeping of land is carried out;
2. Registration of land rights and their transfer
3. Letters as proof of rights, which can be ascertained to act as strong evidence.

These provisions are addressed to the Government in order to be able to regulate and be able to carry out comprehensive land registration in the territory of the Republic of Indonesia.(Nuke Sabilawati, 2003; 40)

PP No.10/1961 stated that land registration is a large work carried out gradually throughout Indonesia; the enactment of PP No. 10/1961 has been implemented in almost all existing municipalities or districts. Then in determining the upper boundary of the land, certain measurements were made, which at that time were known. The people of Tulungagung acknowledged these measurements, such as measurements with Depa, footsteps and so on, but this could not be said to be accurate. On the other hand, the land documents had not been It was stored properly at that time, just like how the Village Head kept it in each village. If the village head had died, it would likely disappear.

After No. 10/1961 was refined in PP No. 24/1997 while maintaining the objectives and the system used for this improvement includes several things that are not yet very clear in PP No. 10/1961, among others, namely:

1. Definition of Registration of Land
2. The principles and objectives of its implementation
3. Presentation of complete information regarding physical data and juridical data
4. The procedure for collecting data on land tenure is simplified and shortened.(Nuke Sabilawati, 2003; 25)

Land registration includes two activities: land registration for the first time (initial registration) and data maintenance (maintenance). 10/1961 and PP 24/1997 The issuance of land rights certificates is one way to obtain legal certainty and protection. In this activity, there are two activities, namely land registration for the first time and activities in maintaining data on land registration, for land registration. The first time it was carried out sporadically and systematically, referring to article 1 number 10 PP 24/1997, this land registration resulted in a certificate of ownership rights as proof of ownership rights over land.

The registration of land for the first time is carried out in 2 ways, namely:

1. Systematic, that is, this land registration activity includes all land registration objects that have yet to be registered simultaneously within the territory of a village or kelurahan and so on, which are mainly carried out on the initiative of the Government.
2. Sporadic, namely activities carried out for land registration regarding one or several objects of registration in an area or part of a village, sub-district individually or in bulk.

For this reason, Article 19 of the UUPA gives instructions to Governments throughout Indonesia to hold Rechtskadaster land registration which has the aim of guaranteeing legal certainty of existing rights to land. . 24/1997 concerning land registration, the outline of the task includes;

1. Measurements and mapping of all land parcels are carried out, including the implementation of its business administration,
2. Registering the rights over the land and the transfer and providing a certificate of title evidence used as strong and valid evidence.

With systematic land registration, the parties concerned will know the status of land rights, the subject of land rights, and clear boundaries to avoid land dispute problems that may arise in the future.

Research in the field shows that there are still very many people who consciously or unconsciously wait to immediately register the transfer of their land rights to the Tulungagung Land Agency before the enactment of PP No. The Land Agency because the community thinks that the Sale and Purchase Deed made by the PPATS/PPAT is sufficient proof of land ownership. (Adhim, 2010; 76)

Amendments to PP No.10/1961 with PP No.24/1997 made the implementation and rules in the UUPA more perfect; this refinement covered many things that were not clear before in the old regulation, namely PP No.10/1961, including the meaning of registration land, principles, and objectives in implementing it which in addition to providing legal certainty is also to collect and present complete information regarding physical and also juridical data related to the land parcel. (Martiananda, 2015)

Before the UUPA and PP No.10/1961 came into effect S.1842-27 yo S. 1947-53, namely the obligator agreement for the transfer of rights was carried out with all written evidence; it could be a notary or private deeded witnessed by a notary and then by the Head of the Cadastral Office who is the changeover employee and one of his employees make a deed

of transfer, only to be registered on the register concerned after the payment obligations have been made.

After the UUPA and PP No.10/1961 came into effect, there were changes; the negative principle was adhered to so that someone could claim that their rights were greater than those stated in the proof of land rights, and the judge had the right to examine/decide on the case and could order the head of the land registration office to be the owner of that right.

Thus, the one who wins the case in the matter of land rights must submit a request to the head of BPN regarding the replacement of the owner of the right and attach the court decision. District court judges are not the only or the first and last institutions but may request appeals and cassation. PP No.24/1997 has adhered to a more pragmatic principle and broadened the scope of conversion implementation and what rights can be used as evidence to be processed in land registration. (War-wind, 2012)

3. What factors form the basis for considering the Deed of Appointment in Tulungagung Regency?

Legal awareness, namely the abstract concepts within humans regarding the harmony of proper order and tranquility, in other words, to achieve harmony and order by the correct rules and regulations according to the state with the law in it.

Based on research in the field shows that many people do not immediately register the transfer of rights to the land they own, namely in the form of a Sale and Purchase Deed made before the enactment of PP No. 24/1997. For them, land registration is not mandatory. They think that the AJB obtained from PPAT/PPATS alone is sufficient.

Several factors form the basis for consideration for the emergence of Designating Deeds for the Land Registration Process. After conducting research at the Tulungagung Regency Land Agency and 20 Notary offices and Land Deed Making Officials in Tulungagung Regency, the following results are obtained;

Legal Factors

The better the rule of law, the easier it will be in the process of land registration, but conversely, the worse the rule of law, the more difficult it will be to enforce it. The legal regulations are legally by the laws of the Republic of Indonesia, namely the order of regulation XX/MPRS/1996 jo. And the stipulation in the People's Consultative Assembly (MPR) No. V/MPR/1973, that is, every currently valid legal regulation must originate from a higher level regulation.

Because before PP No.24/1997, there were still many lands that ignored how important legal certainty was for the land, and in PP No.24/1997 in article 40, which meant no later than seven days work on the date the Deed was signed with the person concerned, it is mandatory to complete it immediately and to register it at the Tulungagung Regency Land Agency office.

In the registration of the transfer of rights due to the transfer of rights, the proof of which is using an authentic deed made by the PPAT must also be carried out immediately by the Head of the Tulungagung Regency BPN by the applicable provisions, even though the deed has passed the 7-day deadline according to PP No. 24/1997 in paragraph 1, with as it

has been determined that the violation of the deadline for submission of the deed made by the PPAT.(Romanides et al., 1997)

Means Factor

Without the support of adequate facilities, it will not be possible for the land registration process to run smoothly, so these conditions include, among others;

- a. Man;
- b. Adequate servers;
- c. Adequate equipment;

If this is not met, it will also be impossible to achieve the goals in land registration to run smoothly, for example; for example, sometimes there are obstacles in the BPN office that have errors in data collection, which sometimes occurs in one full day or more than one day, and therefore it will hinder in the land registration process.(Romanides et al., 1997)

Community Factors

The community plays an important role and greatly influences the smooth running of the PPAT process in submitting the Deeds it makes for registration to the Land Agency; most of the Tulungagung community has little understanding of land registration, and BPN plays a very important role in this matter, namely in providing socialization in the Land sector related to the start- land registration requirements.

Several indicators can be used to find out why the parties did not immediately register land transfers made before PP No. 24 of 1997 was implemented in the implementation of the registration of transfer of land rights, including:

1. Knowledge of the obligation to register the transfer of land rights;
2. Community views on ownership;
3. Knowledge of land registration rules;
4. Respondent's desire to register their land.

In practice, the community/landowners are a big factor in land registration, including:

- a. The knowledge in the community is still relatively low, and the level of education and the economic level is still low, in this case, which causes the emergence of a wrong assumption about proof or certificate of ownership of land rights. The community still needs to realize the importance of certificates as strong evidence fully. Most of the people only have land sale and purchase certificates; there is also enough in the form of receipts or tax payment certificates as a handle; this is because there is an assumption that with mutual trust and there will be no disputes regarding land and even with simple evidence they already feel safe.(Romanides et al., 1997)
- b. Due to the inactivity of the community concerned in assisting the implementation of land registration, for example, in providing the required administrative documents, if there are deficiencies in fulfilling the administrative requirements, they are still passive. Not setting up boundary stakes on the land can also hinder officials from collecting physical data.
- c. The people of Tulungagung Regency, especially in rural areas, still believe that Pethok or Letters C and D are proof of a legal owner and are sufficiently guaranteed by law and also by law so that they are sometimes sold quite privately.

- d. The community also believes that the fees charged are too high because registering a mark is burdened with official and unofficial fees; landowners feel these costs are very high, so they only want to register their land if they have a little money.
- e. Because the land they own is small and the price is low, the cost of registering land is not proportional to the price of the land they own; this encourages them to refrain from registering the transfer of their rights.
- f. They need to learn the procedural requirements and costs of land registration for areas that are rarely reached.
- g. There is an assumption that the old land registration procedures are complicated, so people are reluctant to register their land.

Several of these factors resulted in the emergence of the Making of the Deed Appointing the Deed of Transfer of Rights.

3. Completion of Appointment Deed made by PPAT in Tulungagung Regency

The making of the deedDeed designating the previous title transfer deed has been in effect for a long time in Tulungagung Regency due to the factors mentioned above, which led to the making of the previous deedDeed designating transfer of title deed, but in 2022, the new Head Office policy will begin to limit the land registration process for the first time with the designation deed, the application of this Appointment Deed makes field practice incompatibility with existing law or is called Das sollen the legal regulations are not by the reality of Das Sein.

Due to the large number of Deeds Designating Deeds of Transfer of Titles previously, many land parcels have not been certified and have hampered the complete Systematic Land Registration program because the community perceives Deeds of Transfer of Rights as proof of ownership and not as proof of transfer of rights.

Drawing up of the Deed Designating the Deed of Transfer of Rights previously. Therefore, the Deed drawn up by the PPAT/PPATS for the first time must be registered immediately at the Land Agency Office in Tulungagung district. After that, a new Deed of Transfer is carried out, and within seven days, the transfer must be registered immediately at the Land Agency office.

This is by the provisions of Article 40 paragraph (1) PP No.24/1997 concerning Land Registration jo Regulation of the Minister of Agrarian Affairs/Head of the National Land Agency 3 of 1997 regarding Implementation Provisions of PP No.24/1997 concerning Land Registration Jo Regulation of the Minister of Agrarian and Spatial Planning/Head of the National Land Agency No.16/2021 concerning Changes to the Three Principles of Regulation of the State Minister for Agrarian Affairs/Head of the National Land Agency No.3/1997 concerning Implementation Provisions for PP No.24/1997 concerning Land Registration.

So from that, the settlement in making Appointment Deeds that the PPAT/PPATS has already made needs to make a Statement on the Deed of Risks Against the Deed Made; the statement is made by adjusting the origin of the first time the deedDeed was made, and most of the deedDeed was done by PPATS. Therefore, the Letter of the statement in question is being asked through the local sub-district to state that it is at risk to the land and is responsible for doing the Deed for the land.

Settlement by making a Statement on the Risk Deed Against the Deed Made, namely the statement letter was made by the local Sub-District Head as the PPATS who made the first

deeded, therefore regarding the Making of the Deed Appointing the Deed of Transfer of Rights previously carried out until the end of 2022 from the issuance of the Letter regarding the Making of Deeds Appointing Deeds of Transfer of Rights previously on September 30, 2022, during this time PPAT/PPATS immediately registered the Deeds of Appointing Deeds of Transfer of Rights previously which had already been made to be registered immediately at the Tulugagung District Land Office.

Thus, from the time this condition was enforced until the end of 2022, the Head of the Tulungagung Regency Land Agency Office issued a new rule regarding the Making of Deeds Appointing Deeds of Transfer of Rights in the previous year. The new year is 2023. The making of the deedDeed designating the previous title transfer deed may not be registered at the Land Agency office anymore. Therefore, it is mandatory to register the Deed for the first time, whatever the obstacles and risks that occur with the Deed that was first drawn up.

IV. CONCLUSION

Whereas based on the description of the chapter above, the implementation based on PP No.24/1997 in Tulungagung Regency was mostly carried out, this was due to the ease of requirements, while PP No.10/1961, the basic legal provisions of its implementation were felt not to be sufficient to facilitate the implementation of registration in a short time and the regulations were considered to be still very stiff.

In addition, the factors that triggered the emergence of the Deed designating the Deed of transfer of rights previously concluded that community factors were the biggest factor in making the Deed designate the deedDeed of transfer of rights before.

- The presumption is that the implementation of land registration needs a clearer and definite time limit where whenever they can do this with a sale and purchase deed is considered sufficient as a sign of ownership of land rights.
- The economic factor is the high cost that the community must pay

As well as facilities and government factors also play an important role in improving the required facilities and infrastructure.

Completion of the making of the Deed of Designating the Deed of Transfer of Rights previously carried out by making a Statement on the Deed of Risks Against the Deed Made by the local District Head, and that the Making of the Deed of Designating the Deed of Transfer of Rights previously in 2023 is no longer enforced to conform to any existing regulations and so as not to impede Complete Systematic Land Registration program.

SUGGESTION

It is hoped that BPN will be able to provide a breakthrough that can change the community's paradigm regarding land registration; socialization can be carried out regarding the implementation of registration of transfer of land rights and increased provision of legal counseling, especially regarding land registration which is offset by cooperation between the Land Office and officials at both the sub-district and sub-district levels need to be improved and developed.

There need to be strict regulations that are simultaneously informed to the public, PPAT/PPATS in Tulungagung Regency, regarding the provisions for land registration deadlines and sanctions for those who do not carry them out.

V. REFERENCES

- Adhim, N. (2010). *PENDAFTARAN PEMINDAHAN HAK ATAS TANAH DENGAN AKTA PPAT YANG DIBUAT SEBELUM BERLAKUNYA PP No. 24 TAHUN 1997 DI KANTOR PERTANAHAN JAKARTA PUSAT*. 24.
- Kaunang, M. C. (2016). *PROSES PELAKSANAAN PENDAFTARAN TANAH MENURUT PERATURAN PEMERINTAH NOMOR 24 TAHUN 1997*. 8.
- Martiananda, T. A. (2015). Kekuatan Hukum Sertifikat Hak Atas Tanah Sebagai Alat Bukti (Analisis Terhadap Pasal 32 Peraturan Pemerintah Nomor 24 Tahun 1997). *Tesis. Magister Ilmu Hukum Universitas Islam Indonesia*, hlm 9–10.
- Muhammad Arafah Sinjar, E. A. T. S. (2020). *View of STUDI IMPLEMENTASI PP NOMOR 24 TAHUN 1997 TENTANG PENDAFTARAN TANAH DI DESA TANJUNGSARI KECAMATAN TANJUNGSARI KABUPATEN BOGOR*. <https://jurnal.syntax-idea.co.id/index.php/syntax-idea/article/view/565/430>
- Nuke Sabilawati, S. (2003). *PELAKSANAAN PENDAFTARAN TANAH SEBELUM DAN STELAH PP 24 1997 DI KAB SEMARANG.pdf*. Diponegoro Semarang.
- Perangin-angin, E. (2012). *Hukum Agraria Di Indonesia Suatu Telaah Dari Sudut Pandang Praktisi Hukum*.
- prof. DR.A.P. Parlindungan, S. H. (1990). *Pendaftaran Tanah di Indonesia*.
- Retno Sari Dewi. (2016). *Legalisasi Pengesahan Foto Copy Akta Bawah Tangan Dalam Pembuktian*. Jurnal Yustitiabelan, 2016.
[http://download.garuda.kemdikbud.go.id/article.php?article=419076&val=8954&title=Legalisasi Pengesahan Foto Copy Akta Bawah Tangan Dalam Pembuktian](http://download.garuda.kemdikbud.go.id/article.php?article=419076&val=8954&title=Legalisasi%20Pengesahan%20Foto%20Copy%20Akta%20Bawah%20Tangan%20Dalam%20Pembuktian)
- Romanides, Sukardi, dewa ketut, Krashen, S. D., Ulgen, Fitri Rahmafitria, 2014, Sukardi, dewa ketut, Ruzaik, F., & Fitri Rahmafitria, 2014. (1997). IMPLEMENTASI PASAL 40 AYAT (1) PERATURAN PEMERINTAH NO. 24 TAHUN 1997 TENTANG PENDAFTARAN TANAH. *Icassp*, 21(3), 12–42. [http://downloads.esri.com/archydro/archydro/Doc/Overview of Arc Hydro terrain preprocessing workflows.pdf](http://downloads.esri.com/archydro/archydro/Doc/Overview%20of%20Arc%20Hydro%20terrain%20preprocessing%20workflows.pdf)
- Sadjarwo, I. H. H. (2020). Keabsahan Bukti Lama Berupa Letter C Desa Dalam Kepemilikan Hak Atas Tanah. *Notaire*, 3(1), 107. <https://doi.org/10.20473/ntr.v3i1.19024>
- Surjanti. (2016). Perlindungan Hukum Terhadap Harta Dalam Perkahwinan. *Jurnal YUSTITIABELEN*, 2(1), 70–102.