



REVIEW OF CIVIL LAW ON ELECTRONIC LAND CERTIFICATES IN INDONESIA

ASLAN NOOR, DENI NURYADI, MAHARANI NURDIN
Universitas Singaperbangsa, Karawang, Indonesia
Email: aslan.noor@fh.unsika.ac.id

Abstract


The problem faced so far is the case of multiple land certificates, which ultimately resulted in legal problems involving land disputes that are very common in Indonesia to this day. The government has issued new regulations regarding proof of land ownership, namely Minister of ATR/BPN Regulation Number 1 of 2021 concerning Electronic Certificates. This regulation will change the form of paper land certificates or land books to electronic land certificates whose data is entered into the land system. It is hoped that the presence of electronic certificates or what are usually called e-certificates can be a solution to the problem of land disputes because everything is systemized electronically and makes it easier for the public to process land ownership rights. This research aims to analyze the civil law review of the application of e-certificates in Indonesia. This research uses normative legal research. This research reveals the positive impact of the implementation of the Information and Electronic Transactions Law (UU ITE) on the civil legal system in Indonesia, especially in accommodating electronic evidence. The research results show that legal recognition of electronic transactions, especially electronic letters and electronic land certificates, provides a broader and dynamic basis for resolving civil disputes in court. The government's move to replace physical land certificates with electronic versions, as regulated in ATR/BPN Ministerial Regulation Number 1 of 2021, was also revealed as a proactive response to the challenges of certificate falsification and land ownership uncertainty. This research highlights the equal legal force between physical and electronic land certificates, ensuring that legal adaptation to digital transformation focuses on security, certainty and efficiency in the land system.

Keywords: Legal Review, Electronic Certificate (E-Certificate), Land Certificate, Land Owner

A. INTRODUCTION

Land is one of the basic needs in human production activities, both as a place and as a production factor. Land is a commodity that fulfills the necessities of life that must be owned in order to live more prosperously. Psychologically, humans, especially a prosperous family, will not feel calm until they have their own land and a house as a place of shelter (Maramis, 2013). So important is land for human life, it is not surprising that every human wants to own and control it. Moreover, Indonesia is an agricultural country where the majority of the population still lives from agriculture. Humans compete to control and own the land they desire (Suntoro & Komnas, 2013).

Issues regarding land often give rise to prolonged conflicts between people and people and legal entities (Permadi, 2016). These land disputes seem to never end and always occur because land is a resource that is very necessary nowadays because human need for land always increases along with population growth (Ratih, 2021). The human need for land is so important that it is necessary to have land certificates as a strong legal basis in order to avoid land use which often leads to disputes such as land acquisition, evictions, double certificates of land rights status, lots of land that has been certified has problems (Permadi, 2016). For example, it is not the same size, overlaps, or is even being sued in court. The implementation of land registration in all regions of Indonesia has not been fully registered so that physical data and juridical data for each plot of land are not yet fully available, which of course requires serious attention to the legal case (Laturette, 2016).



In the context of the phenomena previously explained, especially regarding land disputes, the realm of civil law applies the principle that the main goal to be achieved is formal truth (Weku, 2013). This means that in civil legal proceedings, the main emphasis is on fulfilling formal requirements and applicable legal provisions. Formal truth includes aspects such as fulfillment of document requirements, validity of evidence, as well as legal procedures and provisions that must be complied with (Prarono, 2015). In the context of land certificates and land issues, formal truth includes the validity of certificate documents, clarity of ownership status, and fulfillment of land registration procedures regulated by land law. By focusing on formal truth, the civil law system tries to ensure that every transaction or agreement related to land is in accordance with applicable legal norms, so that it can be recognized as valid and legally enforceable (Kobis, 2017).


Land has a very important function for human life, land ownership rights are also regulated by the constitution of the 1945 Constitution of the Republic of Indonesia (UUD 1945) which applies in Indonesia as a legal state (Farhani & Chandranegara, 2019). Meanwhile, in the 1945 Constitution, the regulation of land uses the term Agrarian which has a broader scope, namely earth, water and the natural resources contained therein. The constitution that specifically regulates land, such as rights to land ownership, is regulated in Law Number 5 of 1960 concerning Basic Agrarian Principles or what is often known as the Basic Agrarian Law (UUPA) (Wardhani, 2020). The UUPA has mandated the implementation of land registration to obtain proof of title in the form of a land title certificate as a guarantee of legal certainty and this is further regulated in Government Regulation no. 10 of 1961 concerning Land Registration which has been replaced by Government Regulation no. 24 of 1997 concerning Land Registration (Silvana, 2021).

Proof of rights based on Government Regulation (PP) Number 10 of 1961 and PP Number 24 of 1997 is known as a land certificate. According to the Basic Agrarian Law (UUPA), land certificates provide strong evidence (Article 19 paragraph (2) letter C). This means that this certificate is not absolute in terms of proof, but has significant legal force. As long as the physical and juridical data listed in the Land Book and Measurement Letter are appropriate, the certificate is considered valid, unless there is evidence to the contrary that can be presented in court (Apriani & Bur, 2021).

However, in Indonesia, land certificates can still undergo changes if there are legal and/or administrative defects in their issuance. This choice was taken as a legal protection measure for people who acquire or own land in good faith (Putra, 2017). In other words, certificate changes can be made to ensure that the land certificate issuance process remains in accordance with applicable regulations, so that the legal rights of land owners can be guaranteed and potential legal problems can be minimized. This is in line with the principle of providing legal security to land-owning communities who act in good faith in the process of acquiring their land rights (Murni & Sulaiman, 2022).

In order to realize the modernization of land services, electronic-based land services have begun to be implemented, so that the documents produced are in the form of electronic documents. The policy for launching electronic land certificates began in 2021 with the publication of ATR/BPN Regulation Number 1 of 2021 concerning Electronic Certificates (State et al, 2021). Several parties believe that electronic certificates are not needed at this time, on the grounds that there are still many land disputes, whether due to fake certificates, overlapping certificates, including land registration throughout Indonesia which is the main priority for resolving them. The problem with electronic certificates is not in shape or form, the main problem is electronic processing from the beginning of land registration to the issuance of the certificate and data security issues to protect rights holders, as well as related to the validity of electronic certificates in court. Process (Masykur, 2016).

This is in accordance with the initial existence of regulations regarding electronic transactions, namely Law Number 11 of 2008 which underwent changes as determined by Law Number 19 of 2016 concerning Electronic Transaction Information (ITE) which from the start recognized the existence of electronic certificates apart from conventional certificates which explained regarding electronic



certificates, they are electronic certificates that contain an electronic signature and identity indicating the legal subject status of the parties in an electronic transaction issued by an electronic certification provider (Sholeh, 2021).

This research aims to explore aspects of civil law related to the use of electronic land certificates in Indonesia. In this context, the research objectives include analyzing the validity and legal force of electronic land certificates based on civil law provisions, as well as exploring their impact on land owners and resolving land disputes. The benefits of this research are very important in providing an in-depth legal view of the implementation of electronic land certificates, helping to formulate more effective policies, and making a significant contribution to the development of the electronic land system in Indonesia. In addition, this research is expected to provide better insight to related parties, such as the government, legal practitioners and the general public, to increase understanding and confidence in the applicability of electronic land certificates as valid and reliable legal instruments in land transactions.

B. METHOD

This research uses normative legal research methods, which aim to find legal certainty, legal principles and legal doctrines in order to answer the legal problems faced (Soekanto, 2007). The approach applied is a statutory approach, which involves a thorough analysis of all statutory regulations related to the legal issues being handled. Apart from that, this research uses a Case Approach by examining case decisions related to the problems faced, as well as a Conceptual Approach which examines and analyzes views, doctrines and conceptual frameworks in legal science in accordance with the research objectives (Ariawan, 2013). The analysis of legal sources in this research is qualitative, using primary and secondary legal materials which are described descriptively. Legal material collection techniques are carried out through document or literature studies to collect legal materials from various sources, including primary, secondary and tertiary legal materials. After data collection, the legal material is processed and analyzed descriptively, then connected to legal theories, principles and norms that are relevant to the problems studied.

C. RESULTS AND DISCUSSION

1. Electronic certificates as proof of ownership in civil law

Before the enactment of the Information and Electronic Transactions Law (UU ITE), the field of civil law in Indonesia had not fully adjusted to advancements in information technology, particularly in terms of incorporating electronic documents or information as admissible evidence in court. The prior legal framework, as outlined in Article 164 HIR, Article 284 RBg, and Article 1866 of the Civil Code, recognized five categories of evidence in civil cases: written evidence, witness testimony, circumstantial evidence, admission of guilt, and sworn testimony (Bakhri, 2019).

With the passage of the ITE Law, electronic evidence, particularly electronic letters, is now more commonly utilized in civil proceedings as societal norms evolve. The validity of electronic information or documents is contingent upon the utilization of a dependable and secure electronic system that adheres to the regulations stipulated by the ITE Law (Rizan et al, 2022). The transition from paper-based to electronic-based systems has a significant impact on our perception of efficiency in generating, handling, and storing information. Presently, electronic evidence in civil trials is no longer restricted to the specific categories of evidence outlined in prior laws and regulations. Instead, it acknowledges the need for flexibility and adaptability to keep up with technology advancements (Fakhriah, 2023).

The legal recognition of electronic mail, often known as email, as evidence in civil actions has been clarified by the ITE Law. According to Article 5 paragraph (1) of the ITE Law, electronic information, electronic documents, or printed findings are considered valid and admissible as legal proof. The legal acceptance of electronic transactions has a substantial influence on the dynamics of civil interactions, which are becoming more intricate and current. The provisions of the ITE Law enable the acceptance of



electronic transcripts as legally admissible evidence during trials, representing a progressive measure in aligning the law with advancements in information technology (Tinring et al, 2019).

The implementation of the Information and Electronic Transactions Law (UU ITE) has resulted in a notable shift in the status of electronic land certificates. They are now acknowledged as valid legal evidence in civil court proceedings. In the past, the regulations concerning evidence in civil procedures were more restricted and closely linked to the Civil Code (KUHPer) and its corresponding articles (Momuat). Under the ITE Law, the range of evidence is no longer solely determined by the Civil Code. Instead, it now encompasses the provisions specified in the ITE Law (Momuat, 2014).


Electronic papers, such as electronic land certificates, are now acknowledged as legally admissible evidence in civil courts. This eliminates any previous constraints that may have been present regarding the evidence. Consequently, the acceptance of electronic land certificates as legally admissible proof expands the legal foundation for settling land conflicts and land transactions in a judicial setting. In addition, electronic documents facilitate the opportunity to conduct witness examinations using electronic means. This exemplifies the incorporation of technology in the judicial system, enabling a more streamlined and readily available trial process (Agustina, 2021).

This application has the potential to facilitate additional advancements in the civil legal system, aligning it with the continuous progress of information technology. The acceptance of electronic documents as admissible evidence in court indicates that the regulations pertaining to evidence in civil procedures have become more inclusive and less restrictive. This aligns with the principle of modifying legislation to accommodate advancements in both time and technology, resulting in a legal structure that is more flexible and adaptable to the needs of a progressively contemporary society.

The Minister of ATR/Head of BPN Regulation Number 1 of 2021 establishes the legal framework for the transition to electronic-based land services, with the primary objective of achieving modernization and enhancing service quality. This modernization aims to enhance the metrics of company efficiency and public service provision in response to the evolving circumstances of the era. Hence, the use of electronic-based services is a strategic measure to attain enhanced efficiency, transparency, and receptiveness to the demands of the community. The modernization initiative is put into action by maximizing and exploiting information and communication technologies to carry out land registration procedures (Murni, 2018).

Land registration activities have undergone considerable modifications in the context of modernity, with the issuance of land certificates now being done in the form of electronic documentation. This transition demonstrates the government's dedication to delivering more advanced and streamlined public services. This approach will not only assist the community by decreasing bureaucracy and speeding up administrative processes, but also by establishing a solid legal framework to encourage the advancement of information and communication technologies in the land sector. These actions aim to enhance the quality of public services and facilitate business operations in the land sector by implementing an electronic-based land registration system. This aligns with the worldwide trend towards a more interconnected and efficient society.

Due to technological advancements and the rise of electronic activities, electronic evidence is gaining significance in law enforcement for civil cases. The utilization of electronic information and documents facilitates the enforcement of laws, expedites administrative procedures, and streamlines evidence protocols. Electronic papers generated and printed from electronic activity must also be acknowledged as legally admissible evidence. Electronic evidence plays a crucial part in today's legal landscape, since the admissibility of evidence is not restricted to traditional paper formats. Within this framework, the phrase "electronic evidence" has been defined as information or documents that are produced electronically and acknowledged as legitimate evidence in civil litigation. In order to be



considered acceptable evidence, electronic documents or information must adhere to the regulations stipulated by the Electronic Information and Transactions Law (UU ITE) (Wahyudi, 2012).

According to the ITE Law, electronic information or documents can be considered acceptable evidence if the use of an electronic system complies with the specific conditions outlined in Articles 5 and 6. This encompasses the stipulation that the electronic systems employed must possess dependability, robustness, and adhere to the benchmarks established by the ITE Law. Hence, the acknowledgment of electronic evidence in civil matters is intricately linked to the satisfaction of the criteria and standards stipulated in the relevant legislative framework. Therefore, the development of the notion of electronic evidence demonstrates how the legal system has adjusted to the digital revolution and the growing significance of information technology in contemporary justice.

Article 6 of the Information and Electronic Transactions Law (UU ITE) serves as a crucial foundation for governing the legitimacy of electronic information or documents. This article specifies that information or electronic documents shall be deemed legitimate if the information and data included within may be readily accessed, shown, its integrity is ensured, and can be accounted for in elucidating a situation. This legislation highlights that the credibility of electronic evidence is determined not only by its physical format, but also by the accessibility and precision of the information it contains.

Law Number 8 of 1997 in Indonesia addresses legal advancements and specifically focuses on Company Documents. This law establishes a solid legal framework for electronic evidence. Microfilm copies of company records, when recognized as genuine textual evidence, can be legally accepted as legitimate proof in court proceedings to settle disputes. This signifies the legal adjustment to technological progress in order to establish the validity of electronic evidence, particularly in relation to corporate records.

The Ministry of Agrarian Affairs and Spatial Planning/National Land Agency (ATR/BPN) is embracing technology by incorporating electronic systems into its diverse range of services. The Land Office presently employs an electronic system to verify certificates, issue land registration certificates, furnish data on land values or property asset values, and handle mortgage rights such as *cessie* and *roya*. The introduction of this system is a direct reaction to advancements in information and communication technology, driven by societal needs and modifications in current legislation (Ratih, 2021).

The utilization of this electronic system serves as both an adaptation to technological advancements and a means to enhance resource efficiency, particularly in minimizing the usage of paper, commonly known as paperless. The transition from physical paper documents to digital electronic documents has had a beneficial influence on the generation, manipulation, and retention of information. In addition, the discussion over the transition from analog land certificates to digital land certificates exemplifies the trajectory of progress in the land system. Nevertheless, further regulations and measures are necessary to ensure the security and validity of electronic land certificates, particularly when they are presented as evidence in a legal proceeding (Silviana, 2021).

According to the above description, the evidential strength of an electronic document in establishing the Civil Procedure Law is on par with written evidence or a letter. Thus, electronic land certificates are deemed admissible evidence in civil cases. However, it is important to note that not all parties perceive the evidence from electronic land certificates as flawless, necessitating additional restrictions and provisions.

2. Electronic Certificate as a Form of Avoiding Land Disputes

The fabrication of land certificates, the presence of duplicate land certificates, and the overlapping of land certificates have emerged as the underlying causes of numerous land disputes, resulting in significant adverse consequences for society. Issues of this nature give rise to legal ambiguity concerning property ownership, wherein land title certificates, which are meant to provide assurance of legal clarity, instead become a cause of contention. Furthermore, the prevalent activity of land mafias



engaged in the manipulation of land ownership adds further complexity to the situation, posing a threat to individuals who are entitled to legal protection.

The government must address the question of legal certainty in land ownership by implementing innovative and effective legal reforms. This dilemma necessitates a legal answer that is capable of addressing the intricate dynamics of society, particularly with swift change and advancement. The government should take aggressive measures to establish legislative mechanisms capable of addressing behaviors that harm society and undermine legal stability. Within this framework, modifications and augmentations are necessary for both affirmative legal regulations and legal establishments. This endeavor must take into account not only the formal legal considerations, but also the long-term viability and consistency of the legislation with social dynamics. The efficacy of novel legal advancements will hinge upon the government's capacity to adapt to and foresee societal progressions, as well as surmount tangible challenges that emerge inside the domain.

Avoiding legal stagnation is crucial, as the failure of laws to adjust to societal advancements can lead to the obsolescence of legal norms. The saying that "the law will always be out of date" serves as a cautionary reminder that the law must undergo constant modification and adjustment in order to stay pertinent and efficacious in safeguarding the interests of society. Hence, it is imperative for the government to take proactive measures in addressing social change and ensuring that the legal framework adapts to the needs of a progressively intricate society.

The decision made by ATR/Ka.BPN to substitute physical land certificates with electronic land certificates on January 21, 2021 demonstrates the government's reaction to the widespread counterfeiting of certificates and the ambiguity surrounding property ownership. This measure was implemented with the aim of reducing conflicts and ensuring enhanced legal clarity. Nevertheless, the general public is confronted with several inquiries regarding the legal validity of electronic land certificates.

Ministerial Regulation Number 1 of 2021 on Electronic Certificates, issued by ATR/BPN, holds the status of a statutory regulation that is officially acknowledged and carries enforceable legal authority. In order to possess legally binding authority, a Ministerial Regulation must satisfy two prerequisites: it must either be mandated by superior legislation or established with the appropriate jurisdictional power. The primary source of guidance for this Ministerial Regulation is found in the UUPA and its accompanying regulations, together with other relevant legislation such as the ITE Law and the Job Creation Law. The formation of ATR/BPN Ministerial Regulation Number 1 of 2021 about Electronic Certificates was prompted by directives from superior statutory rules, which establish the legal framework governing the Minister's authority. Ministers in this context serve as aides to the President and possess certain powers within the government. The creation of Ministerial rules is a manifestation of the authorized authority that has been established in line with relevant rules.

With the Ministry of ATR/BPN as the institution in charge of government affairs in the field of land and spatial planning, this Ministerial Regulation is part of the attributive authority that has been given to the Minister. For example, this authority is reflected in the basis for consideration (consideration) of the Ministerial Regulation which explicitly refers to the UUPA and its implementing regulations, as well as related laws and regulations, such as the ITE Law and the Job Creation Law. Thus, ATR/BPN Ministerial Regulation Number 1 of 2021 concerning Electronic Certificates can be interpreted as the result of authority that has been granted and recognized by higher laws and regulations.

Agrarian Law Expert, Kurnia Warman, explained that land certificates in electronic form should have the same legal force as physical certificates. According to him, the legal strength of a certificate does not solely lie in its physical appearance, whether in the form of a physical copy held by an individual or in the form of an electronic copy known as an electronic certificate. The legal strength of the certificate is more related to the suitability of the information contained in it with the data recorded in the land book. The importance of electronic certificates in accordance with the land book reflects the

principle of legal certainty in land affairs. Even though the form is different, namely from physical to electronic, the principle of conformity with recorded data remains the key to validity. Kurnia Warman emphasized that certificates, both in physical and electronic form, are only considered valid if the information matches what is recorded in the land book.

This government step can also be interpreted as an effort to follow global trends in reforming land administration and governance using technology. Although the implementation of electronic land certificates raises a number of questions and concerns from the public, it is hoped that explanations from agrarian law experts such as Kurnia Warman will provide confidence that their legal force remains the same as physical land certificates, as long as they meet the applicable criteria and provisions.


Land certificates, which are given to entitled parties, have a central role as a means of proof that provides legal certainty and security. This certificate not only includes information regarding the type of land right, but also the identity of the subject who has that right and details regarding the land itself. For rights holders, heirs and parties who receive these rights, land certificates provide security and convenience in carrying out legal actions related to the land. This legal certainty provides a sense of security and confidence in transacting or managing land rights. On the other hand, for interested parties, land certificates provide reliable information and can be used as a basis for making decisions or actions related to land aspects. Thus, a land certificate is not only a formal document, but also a vital instrument that supports transparency, justice and legal certainty in land matters.

D. CONCLUSION

The ITE Law provides clearer legal recognition for electronic evidence, such as electronic letters and electronic land certificates. Along with this recognition, there has been a change in the paradigm of evidence in civil cases, no longer limited to the types regulated in a limitative manner by previous legislation. The importance of the ITE Law in the context of evidence can be seen in the legal recognition of electronic transactions, especially electronic letters, which allows electronic transcripts to be recognized as valid evidence at trial. This arrangement reflects a step forward in adapting the law to developments in information technology, recognizing flexibility and adaptability to these advances. Apart from that, a significant impact can be seen on electronic land certificates, which were previously bound by the Civil Code (KUHPer), but with the ITE Law, the scope of evidence is no longer limited to the Civil Code, but also involves the provisions regulated in the ITE Law. The government's move to replace physical land certificates with electronic land certificates, as regulated in the ATR/BPN Ministerial Regulation Number 1 of 2021, reflects a response to the widespread forgery of certificates and uncertainty about land ownership. Although this step raises a number of questions from the public, agrarian law experts emphasize that the legal force of electronic land certificates is equivalent to physical certificates, provided they meet the applicable criteria and conditions. Thus, the evolution of the concept of electronic evidence and changes in the land system reflect the adaptation of law to digital transformation, with a focus on security, certainty and efficiency in the service and resolution of land disputes.

REFERENCES

1. Agustina, E. (2021). Kajian Yuridis Program Penerbitan Sertipikat Hak Atas Tanah Elektronik. *Jurnal Solusi*, 19(3).
2. Apriani, D., & Bur, A. (2021). Kepastian hukum dan perlindungan hukum dalam sistem publikasi pendaftaran tanah di indonesia. *Jurnal Bina Mulia Hukum*, 5(2), 220-239.
3. Ariawan, I. G. K. (2013). Metode Penelitian Hukum Normatif. *Kertha Widya*, 1(1).
4. Bakhri, S. (2019). *Dinamika Hukum Pembuktian Dalam Capaian Keadilan*. Raja Grafindo Persada, Depok.
5. Fakhriah, E. L. (2023). *Bukti Elektronik Dalam Sistem Pembuktian Perdata*. Penerbit Alumni.

- 
6. Farhani, A., & Chandranegara, I. S. (2019). Penguasaan Negara terhadap Pemanfaatan Sumber Daya Alam Ruang Angkasa Menurut Undang-Undang Dasar Negara Republik Indonesia Tahun 1945. *Jurnal Konstitusi*, 16(2), 235-254.
 7. Kobis, F. (2017). Kekuatan Pembuktian Surat Menurut Hukum Acara Perdata. *Lex Crim Farhani, A., & Chandranegara, I. S. (2019). Penguasaan Negara terhadap Pemanfaatan Sumber Daya Alam Ruang Angkasa Menurut Undang-Undang Dasar Negara Republik Indonesia Tahun 1945. Jurnal Konstitusi*, 16(2), 235-254.en, 6(5).
 8. Laturette, A. I. (2016). Penyelesaian Sengketa Hak Atas Tanah Masyarakat Hukum Adat. *Sasi*, 22(2), 52-66.
 9. Maramis, M. R. (2013). Kajian Atas Perlindungan Hukum Hak Ulayat Dalam Perspektif Hak Asasi Manusia. *Jurnal Hukum UNSRAT*, 21(4), 890.
 - Masykur, M. H. (2016). Lembaga Eksaminasi Pertanahan Sebagai Alternatif Model Penyelesaian Sengketa di Bidang Pertanahan. *ADHAPER: Jurnal Hukum Acara Perdata*, 2(1), 37-58.
 11. Momuat, O. M. (2014). Alat Bukti Tulisan Dalam Pemeriksaan Perkara Perdata Di Pengadilan. *Lex Privatum*, 2(1).
 12. Murni, C. S. (2018). Peralihan Hak atas Tanah Tanpa Sertifikat. *Lex Librum: Jurnal Ilmu Hukum*, 4(2).
 13. Murni, C. S., & Sulaiman, S. (2022). Sertifikat Hak Milik Atas Tanah Merupakan Tanda Bukti Hak Kepemilikan Tanah. *Lex Librum: Jurnal Ilmu Hukum*, 8(2), 183-198.
 14. Negara, C. U. K. K., Pratiwi, N. W. W., & Maylinda, P. D. (2021). Urgensi Sistem Pengamanan pada Sertifikat Tanah Digital. *Jurnal Hukum Lex Generalis*, 2(9), 832-855.
 15. Permadi, I. (2016). Perlindungan hukum terhadap pembeli tanah bersertifikat ganda dengan cara itikad baik demi kepastian hukum. *Yustisia Jurnal Hukum*, 5(2), 448-467.
 16. Pramono, D. (2015). Kekuatan pembuktian akta yang dibuat oleh notaris selaku pejabat umum menurut hukum acara perdata di Indonesia. *Lex Jurnalica*, 12(3), 147736.
 17. Putra, F. M. K. (2017). Tanggung Gugat Pejabat Tata Usaha Negara Dalam Bentuk Pembatalan Sertipikat Hak Atas Tanah. *Supremasi Hukum: Jurnal Penelitian Hukum*, 26(2), 1-31.
 18. Ratih, N. R. (2021). Analisis Yuridis Sertifikat Tanah Hak Milik Elektronik (E-Certificate) Demi Mewujudkan Kepastian Hukum.
 19. Ratih, N. R. (2021). Analisis Yuridis Sertifikat Tanah Hak Milik Elektronik (E-Certificate) Demi Mewujudkan Kepastian Hukum.
 20. Rizan, L. S., Nurjannah, S., & Erwin, Y. (2022). Analisis Yuridis Kedudukan dan Kepastian Hukum Alat Bukti Elektronik Dalam Pemeriksaan Perkara Perdata.
 21. Sholeh, M. C. (2021). Analisis Yuridis Resiko Pemalsuan Terhadap Pengadaan Sertifikat Elektronik Di Indonesia. *Jurnal Ilmiah Ilmu Hukum*, 27(10).
 22. Silviana, A. (2021). Urgensi Sertipikat Tanah Elektronik Dalam Sistem Hukum Pendaftaran Tanah di Indonesia. *Administrative Law and Governance Journal*, 4(1), 51-68.
 23. Silviana, A. (2021). Urgensi Sertipikat Tanah Elektronik Dalam Sistem Hukum Pendaftaran Tanah di Indonesia. *Administrative Law and Governance Journal*, 4(1), 51-68.
 24. Soekanto, S. (2007). Penelitian hukum normatif: Suatu tinjauan singkat.
 25. Suntoro, A., & Komnas, H. A. M. (2019). Tinjauan Hak Asasi Manusia terhadap Regulasi Pengadaan Tanah bagi Kepentingan Umum. *Jurnal HAM*, 10(2), 217.
 26. Tining, A. D., Busthami, D., & Yunus, A. (2019). Kedudukan Dokumen Elektronik sebagai Alat Bukti dalam Hukum Acara Perdata di Indonesia. *Celebes Cyber Crime Journal*, 1(2), 56-72.
 27. Wahyudi, J. (2012). Dokumen elektronik sebagai alat bukti pada pembuktian di pengadilan. *Perspektif*, 17(2), 118-126.



28. Wardhani, D. K. (2020). Disharmoni Antara Ruu Cipta Kerja Bab Pertanahan Dengan Prinsip-Prinsip UU Nomor 5 Tahun 1960 Tentang Peraturan Dasar Pokok-Pokok Agraria (UUPA). *Jurnal Komunikasi Hukum (JKH)*, 6(2), 440-455.
29. Weku, R. (2013). Kajian Terhadap Kasus Penyerobotan Tanah Ditinjau Dari Aspek Hukum Pidana dan Hukum Perdata. *Lex Privatum*, 1(2).