

DISPUTE RESOLUTION OF DUPLICATE OWNERSHIP RIGHTS CERTIFICATES (A STUDY AT THE SOUTH TAPANULI LAND OFFICE)

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ABSTRACT

This study aims to analyze the causes of the issuance of duplicate Certificates of Ownership and the dispute resolution mechanism implemented by the South Tapanuli Land Office. The research employs an empirical juridical approach by combining library research with field research through document analysis and interviews with relevant parties. The collected data were analyzed qualitatively by comparing the applicable legal provisions with the facts found in land administration practices. The findings reveal that the issuance of duplicate certificates was primarily caused by weaknesses in administrative verification, an unclear history of land ownership, the absence of complete physical land records, and the limited integration of historical land registration data into the digital land administration system. The dispute was initially addressed through administrative examination and mediation facilitated by the Land Office to seek an amicable settlement. When mediation failed to produce an agreement, the parties retained the right to pursue litigation before the competent court. The study concludes that the effectiveness of preventing duplicate certificates depends on accurate land registration procedures, comprehensive verification of legal and physical data, and the integration of historical land records into a reliable digital administration system. In accordance with the principle of legal certainty in land registration, the certificate issued first generally possesses stronger legal standing, provided that it was issued in compliance with applicable legal requirements and is free from administrative defects.

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INTRODUCTION

Land is one of the most strategic agrarian resources because it has multidimensional values, including economic, social, cultural, and legal values. In Indonesia, land does not only function as a physical space for residence and economic activities but also represents an important asset that supports individual welfare, family sustainability, and national development (Anggriany, 2026). The increasing population growth, expansion of infrastructure, and economic development have caused land demand to continuously increase, resulting in higher economic value of land. This condition makes land one of the objects that frequently generates legal conflicts, particularly when ownership status and control over land are not supported by adequate legal certainty. Therefore, ensuring certainty and protection of land rights has become an important objective in the implementation of national land policies (Nurhadi, 2024).

The strategic position of land requires the state to establish an effective land management system capable of balancing individual interests and public interests. In Indonesia, land management is based on the principle that land resources must be utilized for the prosperity of society while maintaining legal certainty for rights holders. The implementation of this principle requires an organized land administration system because accurate land information is essential in determining ownership status, land boundaries, and legal relationships between subjects and objects of land rights. According to Ulfa (2022), land administration is an important component of land governance because the availability of accurate and reliable land data determines the effectiveness of land management and the prevention of conflicts.

The Indonesian government has established a land registration system through Law Number 5 of 1960 concerning Basic Agrarian Regulations as the foundation of national agrarian law. One of the important objectives of land registration is to provide legal certainty for holders of land rights. This mandate is further implemented through Government Regulation Number 24 of 1997 concerning Land Registration, which regulates procedures for collecting, processing, recording, presenting, and maintaining physical and juridical land data. Wardah & Warka (2023) explains that land registration is not merely an administrative activity but a legal mechanism intended to guarantee certainty regarding the subject, object, and status of land rights.

Through land registration, the government issues certificates as evidence of ownership rights. A Certificate of Ownership (Sertipikat Hak Milik/SHM) functions as strong evidence because it contains information regarding the identity of the rights holder, land boundaries, land area, and legal status of the land. However, the existence of a certificate does not automatically eliminate the possibility of disputes. The reliability of a certificate depends heavily on the accuracy of the administrative process before its issuance, including examination of land history, verification of juridical documents, measurement of land boundaries, and conformity between physical conditions and recorded data. Ardani & Dewi (2020) stated that weaknesses in land registration procedures may result in legal uncertainty even though ownership certificates have been formally issued.

The occurrence of land disputes demonstrates that the implementation of land registration still faces various challenges. One of the problems frequently found in land administration practices is the issuance of duplicate Certificates of Ownership. Duplicate certificates refer to situations where two or more certificates are issued over the same land object, either entirely or partially, resulting in overlapping rights and uncertainty regarding the legitimate rights holder. This condition creates not only conflict between individuals but also indicates possible weaknesses in the land administration process, particularly regarding data verification, cadastral mapping, and maintenance of land records.

Duplicate certificates may occur due to various factors, including juridical factors and administrative factors. Juridical factors are related to legal actions conducted by parties that do not comply with land registration procedures, such as unclear transfer of rights, unregistered transactions, and the existence of competing claims over the same land

object. Meanwhile, administrative factors are related to errors in land administration, such as inaccurate measurements, incomplete land records, overlapping cadastral maps, and weaknesses in the verification process conducted by the Land Office. Herman et al. (2022) explains that inconsistencies between factual land possession and juridical ownership records are among the factors that frequently trigger agrarian disputes in Indonesia.

One important factor contributing to duplicate certificates is the transfer of land rights through underhand transactions. In practice, particularly in rural communities, land transactions are sometimes conducted based on trust between parties without involving a Land Deed Official (Pejabat Pembuat Akta Tanah/PPAT). Such transactions are often considered simpler and less costly compared with formal procedures. However, although an underhand agreement may create a relationship between the parties, it does not automatically change the registered juridical data of land ownership because the transfer of rights must be registered through the land administration system.

The absence of registration of land transfers creates a gap between factual possession and juridical ownership. A person who physically controls land based on an underhand agreement may consider himself or herself the owner, while administratively the ownership remains recorded under the previous certificate holder. Khoirunnisa et al. (2025) explains that failure to register land transfers may create uncertainty because the state administration still recognizes the person whose name is recorded in the land certificate as the rights holder. This condition may become problematic when the land is later transferred, inherited, or used as the basis for obtaining new land rights.

The problem of duplicate certificates is therefore not merely related to determining which party has the strongest claim over land ownership but also involves the effectiveness of the land registration system itself. The land registration system requires synchronization between legal documents, administrative records, and actual conditions in the field. Utama & Ufran (2022) emphasized that legal certainty in land ownership can only be achieved when the legal status recorded in administrative documents corresponds with the actual condition of land control and utilization.

Previous studies have shown that land administration weaknesses remain one of the main factors contributing to land conflicts in Indonesia. Putra & Suryono (2020) explained that land disputes are often caused by unclear ownership history, overlapping claims, incomplete land documentation, and weaknesses in land management institutions. These problems indicate that land disputes are not only caused by conflicts between individuals but also closely related to the quality of administrative governance implemented by land institutions.

In line with this perspective, Virgiawan (2023) emphasized that strengthening land administration is an important element in achieving agrarian reform objectives. Improvement of land data quality, institutional capacity, and administrative transparency are required to minimize errors in land registration. The development of modern land administration systems, including digital transformation of land data, is also expected to improve the accuracy of land information and reduce the possibility of overlapping rights.

The issue of duplicate certificates has also become increasingly relevant along with the transformation of land administration services in Indonesia. Previously, land records were primarily maintained through conventional physical documents, including land books, measurement letters, survey documents, and registration maps. This system required high accuracy in document management because errors in recording, storage, or verification could affect the validity of land information. According to Jeis et al. (2021), effective land services require accurate data management, professional institutional performance, and continuous improvement of administrative procedures.

Although previous studies have discussed land disputes and land administration issues, most studies have generally examined the problem from a broad normative perspective. Previous research has not specifically analyzed how weaknesses in administrative verification processes at the Land Office contribute to the issuance of duplicate Certificates of Ownership in a specific empirical case. Therefore, further examination of individual cases is required to understand the relationship between land transfer practices, registration procedures, administrative responsibility, and dispute resolution mechanisms (Sumiati et al., 2021).

This study focuses on the dispute between Megaria and Rusmiati concerning duplicate Certificates of Ownership in South Tapanuli Regency. This case represents a factual example of how inconsistencies between land possession and registered ownership may lead to legal disputes. The dispute involves Certificate of Ownership Number 224 issued in 1996 under Megaria's name and Certificate of Ownership Number 248 issued in 2024 under Rusmiati's name over the same land object (Tejawati, 2021).

Based on the complaint records of the South Tapanuli Land Office, Certificate of Ownership Number 224 had been issued earlier and had never been cancelled, revoked, or legally transferred before the issuance of Certificate of Ownership Number 248. However, a new certificate was subsequently issued for the same land object under another person's name. This situation raises important legal questions regarding the extent to which the Land Office had conducted verification of land history, physical data, juridical data, cadastral information, and supporting documents before issuing the new certificate (Anggriany, 2026).

The dispute originated from a land transaction conducted in 1997 through an underhand agreement between the previous parties. The transaction was not conducted before a Land Deed Official and was not registered at the Land Office. As a result, although the land was physically controlled by another party, the registered ownership status remained under the name stated in Certificate of Ownership Number 224. This condition demonstrates the consequences of unregistered land transfers and how differences between factual possession and juridical records may create future conflicts (Rasyid & Winanti, 2023).

The problem became more complex when the land was later transferred to Rusmiati through a formal sale and purchase deed made before a Land Deed Official. Based on this deed, Rusmiati submitted an application for land rights registration and subsequently obtained Certificate of Ownership Number 248 in 2024. However, the issuance of the new certificate created objections from Megaria because the previous certificate remained legally registered and had not undergone cancellation or transfer procedures.

This condition indicates the importance of examining the administrative responsibility of the Land Office in preventing overlapping land rights. The Land Office is not only responsible for issuing certificates but also has an obligation to ensure that every registration process is conducted accurately and carefully. Before issuing new land rights, the Land Office must examine land records, ownership history, physical conditions, juridical documents, and other relevant information to ensure that the requested land is not already registered under another party's ownership (Muri et al., 2025).

In addition to certificate issuance, the Land Office also plays an important role in handling land disputes. The authority of the Land Office includes receiving public complaints, conducting administrative research, verifying physical and juridical data, facilitating clarification between parties, conducting field investigations, and implementing mediation mechanisms. These functions are regulated under Ministerial Regulation of Agrarian Affairs and Spatial Planning/National Land Agency Number 21 of 2020 concerning Handling and Settlement of Land Cases.

The dispute between Megaria and Rusmiati demonstrates that administrative dispute resolution mechanisms are an important aspect of land governance. However, in practice, mediation and administrative handling do not always result in agreement between disputing parties. When administrative settlement cannot resolve the dispute, parties may pursue other legal mechanisms through judicial proceedings. This situation shows the need to evaluate the effectiveness of administrative procedures and institutional responsibilities in resolving duplicate certificate disputes (Resmawan & Puspadma, 2025).

Based on the above explanation, there is a gap between the ideal implementation of land registration as regulated by national land law and the reality of land administration practices. Normatively, the land registration system is designed to provide legal certainty and prevent overlapping ownership. However, the occurrence of duplicate Certificates of Ownership indicates that problems remain in the implementation of land registration procedures,

particularly regarding verification accuracy, maintenance of land records, and dispute prevention mechanisms (Fedyawan & Sukresno, 2023).

Therefore, this study aims to analyze the factors causing the occurrence of duplicate Certificates of Ownership, examine the conformity of the issuance process of Certificate of Ownership Number 248 with the provisions of land registration procedures, analyze the administrative responsibility of the South Tapanuli Land Office in issuing land certificates, and evaluate the dispute resolution mechanism implemented based on Ministerial Regulation of Agrarian Affairs and Spatial Planning/National Land Agency Number 21 of 2020.

This research is expected to provide an understanding of the challenges faced in implementing land registration in Indonesia, particularly regarding duplicate ownership certificates. Furthermore, the findings of this study are expected to contribute academically to the development of agrarian law studies and provide practical input for improving land administration services, strengthening verification procedures, and ensuring greater legal certainty and protection for land rights holders.

METHOD

Research Approach

This study uses a juridical empirical research method with a descriptive analytical approach. This approach was chosen to examine the implementation of land registration regulations in resolving duplicate Certificates of Ownership (Sertipikat Hak Milik/SHM). This research analyzes the dispute between Megaria and Rusmiati by examining the relationship between applicable legal provisions and the administrative practices conducted by the South Tapanuli Land Office (Firmanto et al., 2024).

Location and Object of Research

This research was conducted at the South Tapanuli Land Office, North Sumatra, Indonesia. The object of this research is the dispute over duplicate Certificates of Ownership involving SHM Number 224 of 1996 under Megaria's name and SHM Number 248 of 2024 under Rusmiati's name for the same land object. The research focuses on the causes of duplicate certificates, the certificate issuance process, the administrative responsibility of the Land Office, and the dispute resolution mechanism.

Data Collection Techniques

The data collection techniques used in this research include:

Documentation Study

This research uses official land administration documents related to the dispute, including Certificate of Ownership Number 224, Certificate of Ownership Number 248, complaint documents, land registration records, mediation documents, and other supporting documents from the South Tapanuli Land Office. The documentation study aims to obtain information regarding the chronology of the dispute, land ownership status, and administrative procedures in the issuance of certificates.

Clarification Document Analysis

This research also analyzes the Minutes of Clarification (Berita Acara Pelaksanaan Klarifikasi) conducted by the South Tapanuli Land Office. The document contains statements from the parties involved regarding the history of land possession, transfer of rights, and the basis of ownership claims.

Literature Study

Literature studies are conducted by reviewing books, scientific journals, and legal regulations related to land registration, land rights transfer, and settlement of land disputes to support the analysis of research findings.

Data Analysis Techniques

The data obtained were analyzed using qualitative descriptive analysis. The analysis process consists of three stages: (1) Data Reduction, selecting and organizing relevant information from land documents, clarification records, and legal references; (2) Data Presentation, presenting the findings descriptively regarding the causes of duplicate

certificates, administrative processes, and dispute resolution; and (3) Conclusion Drawing/Verification, drawing conclusions by comparing factual findings with applicable legal provisions to determine the conformity of land administration practices.

Data Validity Techniques

To ensure the validity of the research results, this study applies source and document verification. Source verification is conducted by comparing information obtained from land administration documents, clarification records, and legal references. Document verification is carried out by examining the consistency of data contained in the land certificates and administrative records related to the dispute.

RESULT AND DISCUSSIONS

Process of Handling Double Ownership Certificates at the South Tapanuli Regency Land Office

Based on the results of research conducted at the South Tapanuli Regency Land Office, the handling process of overlapping ownership certificates between Certificate of Ownership No. 224 of 1996 registered under Megaria and Certificate of Ownership No. 248 of 2024 registered under Rusmiati was carried out through administrative procedures for handling land cases. The handling mechanism was conducted through complaint registration, administrative examination, verification of physical and juridical data, clarification of disputing parties, field investigation, mediation, and analysis of settlement options.

The dispute began when Megaria submitted a complaint regarding the existence of Certificate of Ownership No. 248 of 2024, which was considered to overlap with her previously issued Certificate of Ownership No. 224 of 1996. The South Tapanuli Regency Land Office then conducted an investigation to determine the causes of the overlapping certificates and examine the validity of the documents owned by each party

Table 1. Process of Handling Double Ownership Certificates

No	Process Stage	Description
1	Complaint Registration	The complaint was submitted by Megaria as the holder of the earlier certificate regarding alleged overlapping land rights.
2	Administrative Examination	Examination of land books, measurement documents, certificates, maps, and supporting documents related to ownership.
3	Verification of Physical and Juridical Data	Verification of land location, boundaries, ownership history, and legal documents.
4	Clarification of Parties	Collection of information from Megaria and Rusmiati regarding the history and basis of ownership.
5	Field Investigation	Direct examination of land conditions, physical boundaries, and land control status.
6	Settlement Analysis	Determination of possible solutions through mediation, administrative action, or court proceedings.

The research results show that the Land Office did not immediately cancel one of the certificates after receiving the complaint. The institution first conducted a comprehensive examination because a certificate issued by the state has legal consequences as an official land document. Therefore, cancellation or correction of certificates requires sufficient evidence regarding administrative defects or errors in the issuance process.

This condition shows that the handling of double certificates requires accuracy in administrative verification because land disputes are closely related to legal certainty and protection of rights. According to (Hutagalung, 2018),

land disputes frequently arise due to differences between administrative records and actual land control conditions, requiring careful investigation by authorized institutions.

Furthermore, the research found that one of the main obstacles during (Guntur & Supriyanti, 2024) the investigation process was the difficulty in tracing historical ownership documents, particularly the incomplete availability of the land file (warkah) related to Certificate of Ownership No. 224 of 1996. The absence of complete historical documents affected the process of verifying the original issuance of the certificate.

According to (Guntur & Supriyanti, 2024), land registration administration requires complete and accurate documentation because land records become the main basis for determining legal certainty of land rights. Incomplete archives may create difficulties in proving the validity of previous land registration processes.

Therefore, the handling process carried out by the South Tapanuli Regency Land Office demonstrates that resolving double ownership certificates requires not only examination of certificates but also evaluation of the entire administrative history of the land object.

Factors Causing Double Ownership Certificates

Based on document analysis and interviews conducted at the South Tapanuli Regency Land Office, several factors contributed to the occurrence of overlapping ownership certificates between Certificate of Ownership No. 224 of 1996 and Certificate of Ownership No. 248 of 2024. These factors involve administrative weaknesses, incomplete historical data, and limitations in verification procedures.

Table 2. Factors Causing Double Ownership Certificates

No	Factors	Description
1	Incomplete Land Archives	Difficulty in tracing previous ownership documents, especially missing or incomplete warkah records.
2	Weakness of Administrative Verification	Lack of accuracy in examining historical ownership and existing land records.
3	Unregistered Transfer of Land Control	Changes in physical possession without immediate administrative registration.
4	Limited Historical Data	Incomplete information regarding previous ownership processes.
5	Measurement and Mapping Problems	Potential differences in boundary data and spatial information.

The findings indicate that the occurrence of double certificates was not solely caused by conflicts between individuals but was also influenced by weaknesses in the land administration system. In this case, the existence of Certificate of Ownership No. 248 of 2024 indicates that the verification process should have considered previous land ownership records to prevent overlapping rights.

Administrative errors in land services can occur when historical data, physical measurements, and juridical information are not synchronized properly. According to (Hadjon, 2015), government administrative actions must be based on the principles of accuracy and legality because administrative errors can result in losses to citizens.

Another important factor identified in this study was the lack of complete historical ownership information. The absence of supporting documents from previous registration processes created difficulties in determining the sequence of ownership rights between the two parties.

This finding is consistent with the opinion of Fitriani et al. (2021), who explains that land disputes often arise due to differences in claims supported by different documents, especially when land administration records are incomplete or inconsistent.

In addition, the development of land administration systems requires integration between physical and juridical data. According to Kumara et al. (2021), digital transformation in land services is important to improve data accuracy

and prevent administrative problems caused by fragmented land records. Thus, double ownership certificates are caused by a combination of administrative weaknesses, incomplete documentation, and insufficient verification of land history before certificate issuance.

Settlement Efforts and Fair Resolution Concept

The South Tapanuli Regency Land Office attempted to resolve the double ownership certificate dispute through administrative mechanisms and alternative dispute resolution approaches. The settlement efforts included clarification between parties, mediation, administrative recommendations, and the possibility of litigation if no agreement could be achieved.

Table 3. Settlement Mechanisms for Double Ownership Certificates

No	Settlement Method	Implementation
1	Mediation	Facilitation of negotiation between Megaria and Rusmiati by the Land Office.
2	Administrative Analysis	Examination of evidence and preparation of settlement recommendations.
3	Certificate Correction/Cancellation	Possible action if administrative defects are proven.
4	Court Settlement	Judicial process when ownership rights cannot be resolved administratively.

The research results show that mediation had been conducted by the Land Office; however, the process did not produce an agreement because both parties maintained their respective claims. Megaria considered Certificate of Ownership No. 224 of 1996 as valid evidence of earlier ownership, while Rusmiati relied on Certificate of Ownership No. 248 of 2024 obtained through a legal transaction.

The failure of mediation indicates that this dispute was not only related to administrative problems but had developed into a conflict regarding ownership rights. Therefore, a judicial decision may be required to provide final legal certainty if administrative settlement cannot resolve the dispute.

According to Febrianti (2021), mediation is an effective mechanism in resolving land disputes because it emphasizes agreement between parties; however, its effectiveness depends on the willingness of disputing parties to compromise.

Furthermore, Nurhadi (2024) explains that alternative dispute resolution provides opportunities for parties to achieve a mutually beneficial solution without immediately going through lengthy litigation. However, when evidence and ownership claims are fundamentally contradictory, court proceedings become an alternative to obtain binding legal certainty.

The research also indicates that improving land administration is an important preventive effort to prevent similar cases. Strengthening document management, improving verification procedures, and utilizing digital land databases are necessary steps to minimize the possibility of overlapping certificates.

According to , protection of land rights requires not only legal recognition through certificates but also accurate administrative systems capable of ensuring that certificate issuance is based on valid and reliable data. Based on this research, the ideal resolution concept for double ownership certificates is not merely determining which certificate is stronger, but also improving the land registration system so similar disputes do not occur in the future. The combination of administrative improvement, mediation, and legal certainty through judicial mechanisms represents a balanced approach in resolving double ownership certificate disputes

CONCLUSION

Based on the results of the research on the settlement of dual Certificates of Ownership (Sertipikat Hak Milik/SHM) disputes between Megaria and Rusmiati at the South Tapanuli Land Office, it can be concluded that the issuance of dual land certificates was caused by interconnected juridical and administrative factors. The dispute originated from the transfer of land rights through a private sale that was not executed before the Land Deed Official (PPAT) and was not registered with the Land Office, resulting in the ownership data remaining under the name of the previous certificate holder. This condition created a discrepancy between the physical control of the land and the juridical data recorded in the land administration system, which eventually led to the issuance of another certificate over the same parcel of land. In addition, weaknesses in the verification of physical and juridical data, examination of land records (warkah), and the incomplete integration of land administration data contributed to the occurrence of the dispute. In resolving the case, the South Tapanuli Land Office implemented the procedures stipulated in the Regulation of the Minister of Agrarian Affairs and Spatial Planning/National Land Agency Number 21 of 2020 through complaint handling, administrative examination, clarification, field inspection, and mediation. However, because mediation failed to produce an agreement between the parties, the dispute was ultimately resolved through litigation to obtain a final and legally binding court decision. These findings indicate that the prevention of dual land certificates depends not only on dispute resolution mechanisms but also on accurate land administration, careful verification procedures, and legal compliance in every transfer of land rights.

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