

Degradation of Proof of Certificate of Title through Complete Systematic Land Registration in Civil Disputes

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ABSTRACT

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The Certificate of Ownership of the Complete Systematic Land Registration serves as an important means of proof in ensuring legal certainty of land rights. However, in civil disputes, the evidentiary strength can be weakened if the certificate issuance process is not supported by legal grounds, physical data, juridical data, and accurate verification. This study aims to analyze the degradation of the proof of Certificate of Property Rights through Complete Systematic Land Registration in civil disputes. The research uses a document-based empirical juridical method with a case study approach to Decision Number 221/Pdt.G/2024/PN Byw. Data was collected through literature studies and documentation of court decisions, land regulations, land registration documents, and related legal literature. The analysis was carried out using qualitative content analysis and legal arguments through codification of the basis of rights, physical data, juridical data, systematic land registration procedures, and judges' considerations. The results of the study showed that the degradation of evidence occurred due to data inconsistency with the village administration, weak research on the basis of rights, conflict of interest in the verification process, and lack of optimal institutional control before the certificate was issued. A certificate of title is not seen as absolute evidence, but rather a strong piece of evidence that can be broken by more convincing evidence of inheritance, land history, and possession facts. This study emphasizes the importance of independent verification, land data validation, and strengthening the accountability of Complete Systematic Land Registration to prevent disputes and increase the evidentiary strength of certificates.



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Introduction

Land is an economic, social, and legal asset that determines the sustainability of the control, utilization, and distribution of resources in society. Tenure certainty and the availability of accurate land data are seen as fundamental elements for land governance, rights protection, conflict reduction, and equitable development. Therefore, land registration functions not only as an administrative mechanism, but also as an instrument for shaping legal information regarding the subject, object, boundaries, and status of land rights (Ndugwa & Omusula, 2025; Tesfaye et al., 2023).

In the Indonesian context, Complete Systematic Land Registration (PTSL) was developed as an instrument to accelerate land registration for the first time simultaneously in a village or sub-district. This program is aimed at expanding the scope of certification, creating legal certainty for rights holders, and improving land administration through the update of physical data and juridical data on land parcels (Huda

et al., 2024). However, the literature on Indonesian cadastres shows that the acceleration of registration is still faced with the problem of land parcels that have been registered but have not been mapped precisely, incompleteness of analog data, differences in spatial data quality, and the need for continuous validation between physical documents and electronic data (Martono et al., 2022; Huda et al., 2024).

The main problem arises when the land rights certificate resulting from PTSL is positioned as proof of ownership in a civil dispute, while the data underlying its issuance is questioned by other parties. Conceptually, a certificate cannot be understood separately from the chain of proof which includes the basis of rights, possession history, determination of limits, measurements, juridical data, and verification procedures before its issuance. Studies on proving land disputes confirm that the settlement of cases requires the construction of a chain of evidence that is able to connect land documents with disputed material facts, rather than simply a formal assessment of the existence of a certificate (Li et al., 2024).

This vulnerability is even more evident if there are boundary mismatches, digitization errors, double field numbers, incomplete measurement data, or insynchronization between old documents and cadastral databases. Research by Fetai et al. (2022) shows that inconsistencies in cadastral boundary data can come from the process of digitization and data maintenance, while Huda et al. (2024) identified problems with the quality of Indonesian land data in the form of registered fields that have not been or are not properly mapped. Thus, the common solutions needed are not enough in the form of increasing the quantity of certificate issuance, but strengthening the verification of the basis of rights, validation of physical and juridical data, integration of spatial data, and quality control mechanisms before the issuance of certificates (Apriyadi et al., 2025; Martono et al., 2022).

A more specific approach in the latest literature is the development of forensic cadastre to identify the sources of inconsistencies that cause land disputes. This approach assesses the institutional structure, procedure design, parties involved, basic documents, measurements, spatial data, and validation processes in an integrated manner. Forensic cadastre is relevant because it allows an evaluation of the relationship between the applicant, village officials, measurement officers, PTSL committees, Land Office, as well as documents used in the formation of certificates (Prabajati et al., 2025).

This approach gained empirical relevance in Decision Number 221/Pdt.G/2024/PN Byw. In the first-instance ruling, the Banyuwangi District Court granted the lawsuit in part, declaring the plaintiffs as the heirs and legal owners of the object of dispute, and declaring documents in the form of certificates, deeds, letters, letters, and sporadic documents related to the object of dispute invalid and having no binding legal force (Banyuwangi District Court, 2025). The Panel of Judges considered that Defendant II, as the Head of Kawang Hamlet, had verified the PTSL registration that he submitted himself, even though the application data was not in accordance with Leter C; the process was then followed up without careful enough research to produce a Certificate of Ownership in the name of Defendant II (Pengadilan Negeri Banyuwangi, 2025).

Although previous studies have discussed the quality of PTSL data, cadastral typology, mapping efficiency, and cadastre forensic approach, no studies have been found that specifically formulate how defects in the basis of rights, subject verification, physical data, juridical data, and issuance procedures affect the degree of evidentiary strength of PTSL Certificates of Ownership in civil disputes. The existing literature is more oriented towards improving the quality of administration or technical settlement of disputes, while the dimension of the degradation of the probative value of certificates in the civil proof process has not yet been systematically constructed (Huda et al., 2024; Prabajati et al., 2025; Li et al., 2024).

This study aims to analyze the degradation of the proof of Certificate of Property Rights issued through PTSL in civil disputes. The novelty of the research lies in the formulation of evidentiary degradation as a decrease or loss of carrying capacity of the certificate against the postulates of ownership when the basis of rights, physical data, juridical data, or verification procedures is proven to be defective in the trial. The research was limited to the analysis of the relationship between the PTSL process, the quality of land basic documents, civil evidence, and the judge's consideration, with Decision Number 221/Pdt.G/2024/PN Byw as the main case study.

Method

This study uses a document-based empirical legal research method with a qualitative case study design. The choice is based on the view that the empirical dimension of law does not always have to be gathered through interviews or field observations, but can be traced through documents that record the workings of law in practice.

Court decisions, land registration documents, and regulations are institutional artifacts that show how norms are applied, debated, proven, and judged by judges. This design does not use interviews, questionnaires, or field observations. Thus, the term empirical juridical in this study refers to the study of the practice of proving and implementing PTSL as recorded in the document, not the research of the perception or experience of the actors through interviews (Webley, 2012).

The object of the research is the degradation of the evidentiary power of the Certificate of Ownership resulting from PTSL in civil disputes, with Decision Number 221/Pdt.G/2024/PN Byw as the main case study. The unit of analysis includes: (a) the construction of the parties' arguments regarding the origin and control of the land; (b) the type, relevance, and relationship of evidence; (c) physical data and juridical data used in the PTSL process; (d) the stages of verification and issuance of certificates; and (e) legal considerations and verdicts. The case study was chosen purposively because the decision contained a dispute over ownership of land parcels that had been certified through PTSL and explicitly tested the carrying capacity of land documents against the claims of the parties.

The research material consists of primary legal materials and secondary legal materials. Primary legal materials include Decision Number 221/Pdt.G/2024/PN Byw, laws and regulations regarding land registration, PTSL, civil proof, and other official documents referred to in the consideration of the decision and accessible to the public. Secondary legal materials are in the form of reputable journal articles, methodology books, and academic publications that discuss land registration, certificates, proof, and analysis of legal documents. Material collection is carried out through literature studies and documentation. All documents are inventoried in a data extraction sheet that contains the identity of the document, authoritative status, context of issuance, relevant substance, and its relevance to the issue of evidentiary degradation.

The validity of the material is maintained through the examination of authenticity, credibility, representativeness, and meaning of the document. Authenticity is done using a copy of the judgment and regulations from an official source or verifiable source. Credibility is tested by comparing the evidence, the judge's considerations, and the verdict. Representativeness is maintained by making a clear distinction between the facts accepted by the judge, the parties' arguments, and the researcher's interpretation. Validation is carried out through source triangulation, which is matching the results with regulations and academic literature, and storing audit trails in the form of document tables and coding schemes.

The analysis technique used is a systematic qualitative content analysis combined with legal argumentation. The analysis began with a thorough reading, followed by deductive coding based on the initial five categories, namely the basis of rights, physical data, juridical data, PTSL procedures, and evidentiary assessment. Inductive coding is then used to find additional themes, such as conflicts of interest in verification, document inconsistencies, weaknesses in data research, or inaccuracies in the assignment of subject rights. Each finding is arranged in a matrix that links the facts, evidence, norms, and judges' considerations. The final stage is carried out through grammatical, systematic, and teleological interpretation to formulate the parameters of evidentiary degradation and its legal consequences. Systematic content analysis is chosen because it allows for a transparent, structured, and replicable review of legal texts, while maintaining the depth of doctrinal argumentation (Bowen, 2009; Salehijam, 2018; Bhat, 2020). The results of the research are presented in a descriptive-analytical and prescriptive manner, with limited analytical generalizations to similar cases.

Results and Discussion

1. Dispute Configuration and Position of PTSL Certificate of Ownership

Decision Number 221/Pdt.G/2024/PN Byw is a civil dispute regarding the control and ownership of yard land in Kawang Hamlet, Labanasem Village, Kabat District, Banyuwangi Regency. The Plaintiffs postulate that the object of dispute is part of the land inherited by Djen P. Sahuri which is recorded in Persil Number 24, Petok Number 344, Class D.II, covering an area of 0.042 hectares. On the other hand, Defendant I and Defendant II controlled the object and applied for registration through PTSL until the issuance of a Certificate of Ownership on behalf of Defendant II.

This dispute does not merely contradict the two claims of ownership, but rather shows the clash between the evidence of the origin of the land and the certificate born from the systematic registration process. The Plaintiffs base their claims on the relationship of inheritance, the Leter C Book and the Village Vulnerability, death certificates, family cards, witness statements, and the facts of possession of the object. On the contrary, Defendant II submitted a certificate of PTSL results as a formal basis for ownership, accompanied by the argument that the land had been controlled by his family for a long time.

The construction of the case shows that the PTSL result certificate does not stand alone in proving civil disputes. The certificate must be positioned as part of a chain of proof that includes the origin of the right, the clarity of the subject, the suitability of the object, the history of possession, measurement, and the research and verification procedures before the certificate is issued. Such an approach is in line with the view that land disputes should be resolved through the establishment of interrelated chains of evidence to uncover substantive legal facts, not through the dominance of a single formal document (Li et al., 2024).

2. Reconstruction of the Chain of Evidence by the Panel of Judges

The Panel of Judges did not assess the certificate separately from other documents and facts in the case. The evidence of the Leter C Book and the Village Insolvency in the name of Djen P. Sahuri is seen as evidence of a letter that shows the basis of the status of the land and the name of the owner in the village administration. However, the Tribunal appropriately did not treat it as a single, conclusive piece of evidence, but rather linked it to death documents, family relationships, witnesses, and other facts to establish the Plaintiffs as the heirs as well as the rightful owners of the object of dispute.

This approach is important because Leter C is not a certificate of land rights, but has historical and juridical relevance in tracing the origins of land tenure. In the first land registration, the proof of old rights does require an assessment of written evidence, witness statements, and/or statements of interested parties in an integrated manner (Government Regulation No. 24 of 1997). Therefore, the evidentiary value of Leter C is not absolute, but it is still significant when it is consistent with the evidence of inheritance, possession history, and testimony of witnesses.

Table 1. Analysis of Evidentiary Aspects and the Evidentiary Strength of Land Certificates in the Judgment

Evidentiary aspects	Findings in the verdict	Meaning of the strength of the certificate
Asal-usul hak	Leter C and Kerawangan Desa recorded the land in the name of Djen P. Sahuri	Indicates the historical basis of possession and ownership that must be tested prior to the issuance of the certificate
Subject of rights holder	The Plaintiffs are proven to be the heirs of Djen P. Sahuri	Certificates in the name of another party become vulnerable if they are not supported by a valid transfer of rights
Verification process	Defendant II as the Head of the Hamlet verified the PTSL application submitted by himself	Creates conflicts of interest and reduces the objectivity of verification
Juridical data	The panel found a discrepancy between the application data and Leter C	Interfere with the basic validity of certificate issuance
Institutional follow-up	The committee and the Land Office are considered not to have carefully examined the data	Process defects weaken the carrying capacity of certificates in trials

Based on the assessment of the entire evidence, the Tribunal declared the Plaintiffs as the heirs and legal owners of the object of dispute. The Panel also stated that Defendant I, Defendant II, Defendant III, Defendant IV, and Defendant V had committed an unlawful act. Thus, this ruling confirms that the strength of a certificate depends not only on the formal form of the document, but also on the material and procedural validity of its formation.

3. Degradation Indicators of Proof of Certificate of Ownership of PTSL Results

Based on the decision, the degradation of the proof of the Certificate of Ownership as a result of PTSL can be identified through four indicators. First, there is a discrepancy between the juridical data of the application and the basic land administration. In this case, the Panel considered that Defendant II should have known that the registration data was not in accordance with Leter C. The discrepancy showed that the data used to support the application did not fully represent the actual history of rights.

Second, there is the issue of the applicant's subject. Defendant II is not only the applicant for the certificate, but also the Head of Kawang Hamlet who, according to the witness's statement, plays a role in verifying PTSL registration in the hamlet. This dual position creates a conflict of interest because verification is supposed to be a control mechanism for the suitability of the applicant's identity, basis of rights, and object data. When the applicant

verifies his or her own application documents, the independence of the process is weakened and the risk of error or abuse of authority increases.

Third, degradation occurs because juridical data research is not carried out adequately. The Minister of ATR/Head of BPN Number 6 of 2018 places the collection of evidence of ownership or control, examination of ownership history, and research of juridical data as the main stages of proving rights. The research cannot be reduced to the acceptance of administrative documents, but must examine the relationship between written evidence, physical possession, witnesses, rights history, and third-party claims (Kementerian ATR/BPN, 2018, Pasal 20–22).

Fourth, there is a failure of institutional control after the initial verification stage. The Panel considered that the process carried out by Defendant III, Defendant IV, and Defendant V was not based on careful enough research to finally produce a certificate on behalf of Defendant II. The findings show that certificates can lose their carrying capacity if weaknesses in the initial data are passed on without correction by the authorized institution.

4. Absence of Objection in the Stage of PTSL Not Data Defective Recovery

The Defendant postulated that the Plaintiffs did not raise any objections during the PTSL process and that the socialization, registration, stake installation, and adjudication stages had been carried out. This postulate basically places the principle of publicity as the basis for the legitimacy of the issuance of certificates. However, the ruling shows that the absence of objections during the administrative process does not remove the inherent defects in the basis of rights, juridical data, or verification mechanisms.

Normatively, the announcement of physical data and juridical data in PTSL does provide an opportunity for interested parties to submit objections. However, the announcement cannot replace the obligation of the Adjudication Committee to conduct objective juridical data research. In fact, if there are still objections or lack of data, the regulation requires that there be a recording in the minutes of the ratification of physical data and juridical data (Kementerian ATR/BPN, 2018, Pasal 24).

Therefore, the principle of publicity should be understood as an additional instrument to open up public participation, not as a mechanism that automatically whitewashes substantive errors. In this case, the certificate is still considered to have no binding legal force because the weakness in the basis of proof and the verification process is proven to be more decisive than the fact that the objection was not filed during the administrative period.

5. Certificate as Strong Evidence, Not Absolute Evidence

Article 32 paragraph (1) of Government Regulation Number 24 of 1997 places a certificate as a valid proof of rights as a strong evidence of physical data and juridical data contained therein, as long as it is in accordance with the data in the land book and survey letters. Consequently, the certificate gives a presumption of truth, but the presumption can still be broken through proof to the contrary.

Decision Number 221/Pdt.G/2024/PN Byw proves the application of this principle. The PTSL result certificate does not automatically defeat the evidence of Leter C, inheritance documents, witness statements, and possession facts when the entire evidence shows that the basis for issuance is problematic. The panel does not only assess who holds the certificate, but also traces who is juridically entitled to the land, how the application is submitted, and whether the verification process is carried out properly.

In the context of this study, this condition is referred to as evidentiary degradation. Degradation does not mean that the certificate does not have legal meaning from the outset, but indicates a decrease in the evidentiary value of the certificate when the following three elements fail to be proven coherently: the legality of the origin of the right, the suitability of the physical-juridical data, and the integrity of the issuing procedure. In the most severe stage, the degradation leads to a court ruling that the certificate and supporting documents are invalid and do not have binding legal force.

This understanding is in line with studies on cadastral data inconsistencies which show that boundary differences, digitization errors, and weaknesses in data maintenance can affect the reliability of cadastral information (Fetai et al., 2022). In the Indonesian context, Huda et al. (2024) also identified that improving the quality of land data is an important issue because land parcel data that has not been accurately mapped or integrated can affect the accuracy of land administration.

6. Legal Consequences and Strengthening Model of PTSL Proof

The judgment granted the Plaintiffs' lawsuit in part, declared the Plaintiffs as the heirs as well as the legal owners of the object of dispute, and declared documents in the form of certificates, deeds, letters, letters, and sporadic documents born from the defendants' actions as invalid and not having binding legal force. The Tribunal also sentenced the Land Office to withdraw the PTSL result certificate on behalf of Defendant II and/or issue a

certificate on behalf of the Plaintiffs in accordance with the procedure after the judgment has permanent legal force (Pengadilan Negeri Banyuwangi, 2025).

These consequences show that a defect of proof in the early stages of PTSL can result in a chain effect. Errors in applicant identification, rights basis checks, and data verification can develop into ownership disputes, lawsuits against the law, withdrawal of certificates, and the need to issue new certificates. Therefore, the success orientation of PTSL cannot be based solely on the number of certificates issued, but must include data accuracy, process integrity, and the ability of the certificate to survive when tested in a trial.

Based on these findings, strengthening the evidence of PTSL needs to be directed at three steps. First, the verification of the basis of rights must be carried out by a party independent of the applicant and can be traced through clear examination documents. Second, Leter C data, transition history, physical possession, field maps, and witness statements need to be cross-tested before the determination of rights is carried out. Third, any fields that indicate a conflict of subjects, objects, boundaries, or grounds of rights should not be processed as certificate-ready fields, but rather placed in dispute clusters or fields that do not yet meet the requirements.

This approach intersects with the concept of forensic cadastre, which is a dispute resolution approach that assesses cases through the stages of identification, identification, individualization, and evaluation of evidence. This approach is relevant for PTSL because it allows for an integrated examination of documents, maps, field boundaries, subject identities, administrative processes, and potential conflicts of interest (Prabajati et al., 2025). Thus, strengthening PTSL not only accelerates the legalization of assets, but also builds certificates that have evidentiary resilience when facing civil disputes.

Conclusion

This study shows that Certificates of Property Rights issued through the Complete Systematic Land Registry do not have absolute evidentiary force in civil disputes. The strength of the certificate still depends on the suitability between the basis of rights, physical data, juridical data, the identity of the rights holder, and the integrity of the verification and research stages before its issuance. In Decision Number 221/Pdt.G/2024/PN Byw, the degradation of proof occurred because there was a discrepancy in the data with Leter C, the subject matter of the applicant, and verification carried out by the interested party on his own application. These defects do not stand alone, but form a chain weakness that reduces the reliability of certificates when tested alongside evidence of inheritance, land history, and witness statements. The decision affirms that the certificate is strong evidence, not absolute evidence; The presumption of truth can be broken by proving otherwise. The degradation of evidence in this study is interpreted as a decrease in the carrying capacity of certificates against ownership claims due to substantive and procedural defects in the PTSL process. At a certain level, the degradation can result in the certificate being declared invalid and not having binding legal force. Therefore, asset legalization must be accompanied by adequate data accuracy and institutional accountability.

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Author Contributions Statement

RM: Conceptualization, methodology, collection and curation of legal materials, formal analysis, investigation, and writing of preliminary drafts. MA: Validation of analysis, writing, review and editing, supervision, and administration of research. RM and MA: Development of argumentation, interpretation of research results, preparation of conclusions, and approval of the final version of the manuscript.

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for the formulation of the problem, the selection of methods, the tracing and verification of sources, legal analysis, the interpretation of data and decisions, the conclusion, originality, accuracy, and academic integrity of the manuscript. Artificial intelligence tools are not listed as authors or contributors, in accordance with the ethical standards of scientific publications.

Conflict of Interest

The author declares that there are no conflicts of interest, whether financial, institutional, professional, or personal, that can affect the conduct of research, analysis, interpretation of results, or the preparation of this article.

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