# Juridical Analysis of The Termination of Village Heads Affected in The Case of Zina

Mohamad Agus Soleh<sup>1</sup>, Imawan Sugiharto<sup>2</sup>, Moh. Khamim<sup>3</sup> {m.agus.lebaksiu@gmail.com}

Postgraduate Program, Master of Law, Universitas Pancasakti Tegal, Indonesia

Abstract. This is due to immoral acts in the form of adultery committed by Mr. The head of village (Head of Sumbarang Village) certainly cannot be justified and violates the norms that exist in the community, that there is no process in the criminal justice system that proves this, and there is also no proposal from the Village Consultative Body and no temporary suspension. for the Head of Sumabarang Village, it does not necessarily eliminate responsibility - and becomes a factor that can cancel the decision to dismiss. Harmonization of laws and regulations on legal products that regulate the dismissal of the Village Head as well as optimizing the role and function of the Functional Position of Invitation Designer in the Legal Division of Tegal Regency in the preparation of Regent Regulations and Tegal Regent Decrees, so that legal products are produced in accordance with the formulation and procedures as well as the basis for drafting laws and regulations.

Keywords: Village Heads Effectted, The Case of Zina.

## 1. Introduction

The village head of Sumbarang named Mr. The head of village who was originally appointed by the Regent of Tegal, but has not finished serving as Mr. The head of village (Head of Sumbarang Village) was dismissed by the Regent of Tegal through the Decree of the Regent of Tegal Number 141/826 of 2020 concerning the Dismissal of Mr. The head of village from the position of head of Sumbarang Village, Jatinegara District, Tegal Regency on September 15, 2020 due to violating the prohibition as a Village Head, namely taking actions to disturb a group of village people[1]. The Head of Sumbarang Village with his own resident named Ms. Taricha is suspected of having committed sexual intercourse or is suspected of committing the crime of overspel (adultery), so that this triggered a demonstration which was attended by 150 (one hundred and fifty) people at the Sumbarang Village Hall on March 6, 2022 [2]. The crime of overspel (adultery) which allegedly committed by Mr. The head of village (Head of Sumbarang Village) with Ms. The Taricha was not resolved through existing criminal law provisions, but the evidence was then processed administratively in stages according to existing procedures, starting from the Village Consultative Body (BPD) of Sumbarang Village, Camat, and the Tegal Regency Inspectorate.

The Head of Sumbarang Village did not accept the decision on his dismissal and submitted a Letter of Claim dated October 20, 2020 to the Tegal Regent (Defendant) through the Semarang State Administrative Court and registered with Case Register Number 86/G/2020/PTUN.SMG . Case Number 86/G/2020/PTUN.SMG was won by the Regent of Tegal (Defendant), the Panel of Judges rejected all claims by Mr. The head of village (Head of Sumbarang Village/Plaintiff) in its entirety, but the decision was not fully obtained from the common opinion of the Panel of Judges, there is a Panel of Judges Member I having different

legal opinions with the Chairman of the Panel of Judges and Judge Member II, which is stated through (dissenting opinion).

Decision on Case Number 86/G/2020/PTUN.SMG was then appealed to the Surabaya State Administrative High Court with Case Register Number 119/B/2021/PT.TUN.SBY dated May 18, 2021 and was again won by the Regent of Tegal (Defendant/ Appellate)[3–5].

Based on the description of the background above, the author wants to research and conduct a legal analysis regarding how to dismiss the Village Head according to the provisions of the existing laws and regulations in Indonesia and how the legal considerations of the Panel of Judges in the State Administrative Case Number[6]. 86/G/2020/PTUN.SMG jo. Number. 119/B/2021/PT.TUN.SBY who won the Tegal Regent (Defendant/Appellate) with the object of dispute in the form of Tegal Regent Decree Number: 141/862 of 2020 concerning the Dismissal of The head of village from the position of head of Sumbarang Village, Jatinegara District, Tegal Regency dated September 15, 2020, whether the object of the dispute is correct in terms of authority, procedure, and substance as well as guiding the general principles of good governance, using the parameters as regulated in Article 52 paragraph (1) and paragraph (2) of Law Number 30 of 2014 concerning Government Administration and Article 53 paragraph (2) letters a and b, Law Number 5 of 1986 concerning the State Administrative Court although there are several legal facts that the author has the theme of as follows:

First, the Village Consultative Body (BPD) of Sumbarang Village although it does not directly express its support, but in fact the Village Consultative Body (BPD) of Sumbarang Village through its policies has benefited Mr. The head of village (Head of Sumbarang Village/Plaintiff) and did not carry out the directions from the Tegal Regent's Letter Number 700/03/2066/2020 dated May 18, 2020 which had ordered the Village Consultative Body (BPD) of Sumbarang Village to propose the dismissal of The head of village (Head of Sumbarang Village/Plaintiff) from the position of Head of Sumbarang Village, Jatinegara District, Tegal Regency. However, through his reply letter Number: 006/BPD/SUM/VI/2020, he only proposed a Warning Sanction and/or Written Reprimand to Br. The head of village (Head of Sumbarang Village/Plaintiff) dated June 4, 2020. Besides that, there is still support from the community for Br. The head of village (Head of Sumbarang Village/Plaintiff) through a statement of attitude to the Regent of Tegal, principally continued to support the Village Head of Sumbarang until the end of his term of office, including from RW 03 Sumbarang Village, Community Empowerment Institution - LPMD Sumbarang Village, RW 04, RW 01, and the RT-RW Community of Sumbarang Village. Second, the process of temporary dismissal was not passed before the Tegal Regent had made a permanent dismissal of Mr. The head of village (Head of Sumbarang Village/Plaintiff). Third, there is no criminal verdict that proves that Br.

The head of village (Head of Sumbarang Village/Plaintiff) has committed a crime in the form of adultery, so that the evidence against the adultery was only based on the testimony of witnesses in the administrative realm at the examination conducted by the Tegal Regency Inspectorate. state power (machtsverdeling). As a formal law, the philosophy of the procedural law of the State Administrative Court is reflected in the consideration of Law Number 5 of 1986 concerning the State Administrative Court, namely the existence of protection for the community by the State Administrative Court in order to realize a harmonious, balanced, and harmonious relationship between the apparatus. in the field of State Administration with community members. Therefore, the author discusses this issue to be used as legal writing with the title "Juridical Analysis of the Dismissal of Village Heads Affected by Zina Cases" with the formulation of the problem how to regulate the dismissal of Village Heads based on the provisions of the legislation in force in Indonesia? and how is the analysis of the judge's

legal considerations in the dispute regarding the dismissal of the Village Head who was affected by the adultery case in the Decision on State Administrative Case Number 86/G/2020/PTUN.SMG?

# 2. Method

The type of research used by the author in this study is library research. The approach method used by the author in this research is a normative juridical approach or doctrinal legal research. Law is conceptualized as what is written in the legislation (law in book). Sources of data used by the author in this study is secondary data. Secondary data is data obtained through library materials. Secondary Data consists of Primary Legal Materials, Secondary Legal Materials, and Tertiary Legal Materials obtained from books, literature, papers, laws and regulations, and other data sources.

#### 3. Result & Discussion

Village or village comes from Sanskrit, denotatively, village means an independent organization or a residential area that regulates itself, while connotatively it means as a colony, in the sense that the existence of a village cannot be separated from a higher organization, namely the state, both in the form of the state. modern and royal. Village government is a process of integrating the efforts of the village community with the government's efforts to improve the standard of living of the community. Seeing the mandate of the law, the village government is a unitary government that has the responsibility to realize village sovereignty. With the basic aim of protecting the entire Indonesian nation and the entire homeland of Indonesia, advancing public welfare, educating the nation's life, and participating in carrying out world order based on independence, eternal peace, and social justice.

As stipulated in Article 26, Law Number 6 of 2014 concerning Villages, the Village Head is tasked with administering Village Administration, implementing Village Development, Village community development, and empowering Village communities, while the provisions regarding the dismissal of the Village Head are contained in Law Number 6 of 2014 concerning Villages as amended several times, most recently by Law Number 11 of 2020 concerning Job Creation Jo. Government Regulation Number 43 of 2014 concerning Implementing Regulations of Law Number 6 of 2014 concerning Villages as last amended by Government Regulation Number 11 of 2021 concerning Regional Owned Enterprises Jo. Minister of Home Affairs Regulation Number 82 of 2015 concerning the Appointment and Dismissal of Village Heads as amended by Minister of Home Affairs Number 66 of 2017 concerning Amendments to the Regulation of the Minister of Home Affairs Number 82 of 2015 concerning the Appointment and Dismissal of Village Heads.

Based on Article 12, Minister of Home Affairs Regulation Number 82 of 2015 concerning the Appointment and Dismissal of Village Heads, further provisions regarding the appointment and dismissal of Village heads are stipulated in the Regent/Mayor Regulation, namely Tegal Regency Regional Regulation Number 6 of 2015 concerning Village Heads, Apparatus Village and Village Consultative Body Jo. Tegal Regent Regulation Number 27 of 2018 concerning Village Heads as amended by Regent's Regulation Number 31 of 2019 concerning Amendments to Tegal Regent's Regulation Number 27 of 2018 concerning Village Heads.

The author finds the fact that there has not been a harmonization of the formation of good laws and regulations at the central government level with local governments, we can see this in the regulation above which does not contain the same material/substance, there are differences in Article 8 paragraph (3) of the Ministerial Regulation Domestic Affairs Number 82 of 2015 concerning the Appointment and Dismissal of Village Heads, which states "if the Village head quits, the Village Consultative Body "reports" to the Regent/Mayor through the sub-district head or other designations with Article 77 paragraph (3) Tegal Regent Regulation Number 27 of 2018 regarding the Village Head, stated that the dismissal of the Village Head was "proposed" by the Head of the BPD to the Tegal Regent through the Camat based on the decision of the BPD Deliberation.

Article 8 paragraph (3), paragraph (4) and paragraph (5) of the Regulation of the Minister of Home Affairs Number 82 of 2015 concerning the Appointment and Dismissal of a Village Head essentially states that if the Village Head resigns, the Village Consultative Body reports to the Regent/Mayor through the Camat or other designations. accompanied by the Village Consultative Body Leadership Report to the Regent/Mayor containing material on the situation that occurred to the Village Head concerned, then on the report of the Village Consultative Body Leader the Regent/Mayor conducts a study for the next process. Based on this, the Village Consultative Body (BPD) has the authority to report if there is a Village Head who meets the requirements to be dismissed, the results of the report are used as study material for the Regent/Mayor to determine the next process so that it is not an absolute requirement that must be met, so that even without The existence of a Village Consultative Body (BPD) report is essentially the Regent/Mayor who has the authority to ratify the dismissal if the Village head is proven to meet the requirements to be dismissed. Whereas in Article 77 paragraph (3), paragraph (4) and paragraph (5) of the Tegal Regent Regulation Number 27 of 2018 concerning the Village Head, it stipulates that in the event that the Village head is dismissed, he must meet the requirements, namely being proposed by the chairman of the Village Consultative Body (BPD). to the Regent based on the decision of the BPD Deliberation based on the Report of the Examination Result of the Regency Inspectorate.

Based on the description of the dismissal of the Village Head above, according to the author's analysis, there has been a material/substance discrepancy that regulates the dismissal of the Village Head who meets the requirements to be dismissed, this can cause problems in law enforcement so it is necessary to harmonize regulations by referring to the hierarchical provisions of laws and regulations. an invitation which is a tiering of each type of statutory regulation on the principle that a lower statutory regulation may not conflict with a higher statutory regulation.

Then regarding the provisions for the temporary dismissal of the Village Head as mentioned above, in the provisions of Article 9, Regulation of the Minister of Home Affairs Number 82 of 2015 concerning Appointment and Dismissal - Village Heads basically contain the same substance as Article 76 paragraph (1) of Tegal Regent Regulation Number 27 Year 2018 concerning Village Heads. However, in the Regent's Regulation the word "can" in the phrase "The Village Head can be temporarily dismissed by the Regent/Mayor" has been omitted.

The word "can" can be interpreted as not an essentialia, it contains meanings that are not clear, ambiguous and uncertain so that it has the potential to provide opportunities for law enforcement to treat different actions or policies for the same act. However, the impact of omitting the word "can" has made the temporary suspension a staple.

The Panel of Judges observed and studied the decision on the object of the dispute, namely the Decree of the Regent of Tegal Number: 141/826 of 2020 concerning the Dismissal of Mr. The head of village from the position of Head of Sumbarang Village, Jatinegara District, Tegal Regency dated September 15, 2020, the arguments of the parties and the evidence presented at the trial, in order to test the issuance of the decision on the object of dispute in terms of the procedure and substance of the issuance, using the parameters as regulated in Article 52

paragraph (1) and paragraph (2) of Law Number 30 of 2014 concerning Government Administration as amended, which states that the conditions for the validity of the decision include:

- 1. determined by the competent authority;
- 2. made according to procedures; and
- 3. substance in accordance with the object of the decision

Meanwhile, the validity of the decision as intended is based on the provisions of the legislation and general principles of good governance as regulated in Article 53 paragraph (2) letter a and letter b, Law Number 5 of 1986 concerning the State Administrative Court. The following are the legal considerations from the judge in passing the verdict on Case Number 86/G/2020/PTUN.SMG, among others:

## 3.1 The Authority of the Regent of Tegal in Determining the Object of the Dispute

As on page 73, Decision on Case Number 86/G/2020/PTUN.SMG. The Chairperson of the Panel of Judges and Member Judges II considered that based on the above regulation, the object of the dispute was the Tegal Regent Decree Number: 141/862 of 2020 concerning the Dismissal of Mr. The head of village from the position of Head of Sumbarang Village, Jatinegara District, Tegal Regency dated September 15, 2020, the Panel of Judges is of the opinion that the Defendant (Tegal Regent) is a government administrative body and/or official who has the authority to issue a decision on the object of a quo dispute. Based on the description above, the author agrees with the legal considerations that the Chairperson of the Panel of Judges and Member II Judges consider the following: related to the authority of the Tegal Regent in dismissing the Sumbarang Village Head. The Tegal Regent has the delegation of authority to issue a decision letter on the object of dispute based on the provisions of the legislation, including: First, Article 40 paragraph (3), Law - Number 6 of 2014 concerning Villages, which states the Dismissal of the Village Head as referred to in paragraph (1) shall be determined by the Regent/Mayor. Second, Article 54 paragraph (4) of Government Regulation Number 43 of 2014 concerning Implementing Regulations of Law Number 6 of 2014 concerning Villages, which states that the dismissal of the Village head as referred to in paragraph (3) is stipulated by a decision of the Regent/Mayor. Third, Article 10 paragraph (1) of the Regulation of the Minister of Home Affairs Number 82 of 2015 concerning the Appointment and Dismissal of the Village Head, which states that the ratification of the dismissal of the Village Head is stipulated by the Decree of the Regent/Mayor. Fourth, Article 32 paragraph (4) of the Tegal Regency Regional Regulation Number 6 of 2015 concerning the Village Head, Village Apparatus and Village Consultative Body. Fifth, Article 77 paragraph (3) of the Tegal Regent Regulation Number 27 of 2018 concerning Village Heads.

### 3.2 Procedure for Determining the Object of the Dispute

As on page 84, Decision on Case Number 86/G/2020/PTUN.SMG. The Chairperson of the Panel of Judges and Member Judge II, considering that based on legal facts and related to the procedure for issuing disputed objects as regulated in Article 76 and Article 77 of the Tegal Regent Regulation Number 27 of 2018 concerning the Village Head, the Panel of Judges is of the opinion that due to immoral acts committed and recognized Mr. The head of village (Head of Sumbarang Village) in the inspection at the Inspectorate is that having sex with a woman who is not his wife is a very inappropriate act to do - a Village Head who should be a role

model and role model for his citizens, and this act has violated the norms religion and moral norms, so that the Panel of Judges is of the opinion that the act is not an act that can be tolerated a second time and if tolerated it will set a bad precedent for the Village Head and/or other Village Government Officials, so there is no guidance in the form of an oral and/or written warning, and/or temporary dismissal as mandated in Article 76 of the Tegal Regent's Regulation Number 27 of 2018 concerning Village Heads, which is intended not to be repeated for legal reasons and does not cause the validity of the object of the dispute to be legally flawed procedurally. although the proposal of the Sumbarang BPD is regulated in Article 77 paragraph (3) of the Tegal Regent Regulation Number 27 of 2018 concerning the Village Head, it is stated that the dismissal of the Village Head is "proposed" by the Head of the BPD to the Tegal Regent through the Camat based on the decision of the BPD Deliberation. The author is of the opinion that there is no obligation or authority for the Village Consultative Body (BPD) to propose the dismissal of the Village head so that this has violated the regulations higher above it as stipulated in Article 8 paragraph (3), Regulation of the Minister of Home Affairs Number 82 of 2015 concerning the Appointment and Dismissal of the Village Head which states that if the Village head quits, the Village Consultative Body "reports" to the Regent/Mayor through other designations.

In this case, where the fact was found that the Village Consultative Body (BPD) of Sumbarang Village seemed reluctant to carry out the Tegal Regent's order to propose the dismissal of the Donation Village head, even up to 3 (three) times, the Sumbarang Village Consultative Body (BPD) insisted on only proposing warning sanctions. According to the author, by looking at the legal facts above, there is an error from the Tegal Regency Regional Government In drafting the regulations so that it resulted in problems in the implementation of the dismissal, the Plaintiff's argument arose that the Sumabarang Village Head could not be dismissed without going through the proposal of the Sumbarang Village Consultative Body (BPD) this seemed to make the Sumbarang Village Consultative Body (BPD) an institution that had the authority to do so. is not limited and cannot be directed even by the Regent.

This makes the Village Consultative Body (BPD) of Sumabarang Village, which should have the obligation to maintain norms and ethics in society, in this case does not show its firmness and instead tends to in its policy favor the Sumbarang Village Head who in fact has violated the Village Head's prohibition, namely committing immoral acts in the form of adultery. Article 8 paragraph (3), paragraph (4) and paragraph (5) of the Regulation of the Minister of Home Affairs Number 82 of 2015 concerning the Appointment and Dismissal of the Village Head states that if the Village head quits the Village Consultative Body reports to the Regent/Mayor through the Camat or other designations accompanied by The Village Consultative Body Leader's report to the Regent/Mayor contains material on the situation that occurred to the Village Head concerned and on the report of the Village Consultative Body Leader, the Regent/Mayor conducts a study for the next process.

The Village Consultative Body (BPD) only has the authority to report if there are Villages who meet the requirements to be dismissed, the results of the report are used as study material for the Regent/Mayor to determine the next process, not an absolute requirement that must be met. So according to the author, even without a Village Consultative Body (BPD) report, it is essentially the Regent/Mayor who has the authority to ratify the dismissal if the Village head is proven to meet the requirements to be dismissed.

Regarding the argument to Sumbarang Village (Plaintiff) which states that the object of dispute procedure is invalid because there is no temporary suspension for a period of 3 (three) months and a maximum of 6 (six) months to see the good intentions of the person concerned to carry out his obligations and/or not to violate the prohibition, based on the legal

considerations put forward by the Panel of Judges which stated "no temporary suspension is carried out for a period of 3 (three) months and a maximum of 6 (six) months to see the good intentions of the person concerned to carry out his obligations and/or In order not to violate the prohibition, which is stated in Article 76 and Article 77 of the Tegal Regent Regulation Number 27 of 2018 concerning Village Heads, the Panel of Judges is of the opinion that the essence of the temporary dismissal procedure regulated in Articles 76 and 77 above lies in the opportunity for guidance related to attitude the performance of a village head is not related to the attitude of am community association (Ethics)". The author appreciates the legal considerations of the Panel of Judges mentioned above and agrees that the essence of a temporary suspension lies in the opportunity for coaching. Based on this description, it is hoped that the legal considerations from the Panel of Judges can become the basis and reference regarding the provisions regarding issues related to premature suspension in the legislation.

#### 3.3 The substance of the Object of the Dispute

As on page 86, Decision on Case Number 86/G/2020/PTUN.SMG. The Chairperson of the Panel of Judges and Member Judges II, considers that as stipulated in Article 77 paragraph (6) of the Tegal Regent Regulation Number 27 of 2018 concerning the Village Head, one of the reasons for the dismissal of the Village Head is violating the prohibition as a Village Head, which has been described by Article 3 of the Regulation Tegal Regent Number 27 of 2018 concerning Village Heads, especially letter e. "to carry out actions that disturb a group of villagers". Whereas based on the facts above, based on evidence P-13 = T-1 = Object of the Dispute, in the form of Decree of the Regent of Tegal Number: 141/826 of 2020 - concerning the Dismissal of Mr. The head of village from the position of Head of Sumbarang Village, Jatinegara District, Tegal Regency dated September 15, 2020, was associated with evidence T-2, in the form of a Special Examination Result Report on Alleged Immoral Acts carried out by Mr. The head of village Head of Sumbarang Village Number: 356/03/0634 dated May 12, 2020, obtained legal facts that the Defendant's basis for dismissing the Plaintiff as Head of Sumbarang Village is the Report of Examination Results by the Tegal Regency Inspectorate against The head of village Village Head Sumbarang, who concluded that The head of village S.Pd.I, the Village Head of Sumbarang, had been proven to have committed immoral acts, which caused unrest in a group of people in Sumbarang Village, thus violating one of the prohibitions as Village Head and recommended to be dismissed as Sumbarang Village Head.

Consider in substance the object of the dispute as referred to in Article 77 paragraph (6) of the Tegal Regent's Regulation Number 27 of 2018 concerning the Village Head, one of the reasons for the dismissal of the Village Head is violating the prohibition as a Village Head, namely taking actions that disturb a group of village communities. This is corroborated by the fact that Br. The head of village (Head of Sumbarang Village) has been proven to have committed adultery and caused a demonstration which was attended by 150 (one hundred and fifty) community members. Based on this, according to the author, the Panel of Judges has been right because in terms of aspects of authority, procedure and substance it does not violate the provisions of the applicable laws and regulations.

Based on the description above, according to the author, this is in accordance with the philosophy of life of the Indonesian nation, Indonesia is a legal state based on Pancasila and the 1945 Constitution of the Republic of Indonesia by upholding moral, ethical, moral and noble values of the nation, having faith and piety. to God Almighty, and respecting diversity in the life of society, nation and state and protecting the dignity and worth of every citizen. The

author is of the opinion that in the trial there were 2 (two) important keys to the fulfillment of the substance requirements for the issuance of the dismissal decision, namely: First, the Report of the Special Examination Results of the Tegal Regency Inspectorate against the Sumabarang Village Head Number 356/03/0634 dated May 12, 2020, the results of which stated that the Head of The village of Sumbarang has been proven to have committed immoral acts. The second is the statement of Witness Nastiti Nasiatul Aisiyah and Witness Uly Maria Ulfah, which corroborates the results of the report because they witnessed the examination process firsthand. If the 2 (two) evidences mentioned above are not fulfilled, then in substance it will certainly be more difficult to prove the fulfillment of the substantive requirements for the dismissal of the Village Head, then related to the authority to issue a dismissal decision. Judges who only use the Tegal Regent Regulation Number 27 of 2018 as amended by the Regent's Regulation Number 31 of 2019 as the sole legal basis in assessing the procedure are not appropriate, because to strengthen legal considerations in deciding cases the Panel of Judges needs to consider the laws and regulations above, namely Minister of Home Affairs Regulation Number 82 of 2015 as amended by Minister of Home Affairs Regulation Number 66 of 2017.

## 4. Conclusion

According to the author of the Panel of Judges in ijtihad to decide the case, it has fulfilled a sense of justice for the community, this is due to immoral acts in the form of adultery committed by Mr. The head of village (Head of Sumbarang Village) certainly cannot be justified and violates the norms that exist in the community, that there is no process in the criminal justice system that proves this, and there is also no proposal from the Village Consultative Body and no temporary suspension. for the Head of Sumabarang Village, it does not necessarily eliminate responsibility - and becomes a factor that can cancel the decision to dismiss. The need for harmonization of laws and regulations on legal products that regulate the dismissal of the Village Head as well as optimizing the role and function of the Functional Position of Invitation Designer in the Legal Division of Tegal Regency in the preparation of Regent Regulations and Tegal Regent Decrees, so that legal products are produced in accordance with the formulation and procedures as well as the basis for drafting laws and regulations.

### References

- [1] Jamaludin AN. Sosiologi Perdesaan. Surakarta: Pustaka Setia; n.d.
- [2] Maemunah NZ. Kewenangan Kepala Desa Dalam Mengangkat Dan Memberhentikan Perangkat Desa Di Tinjau Dari Undang-Undang Nomor 6 Tahun 2014 Tentang Desa. Jurnal Pendidikan Pancasila & Kewarganegaraan n.d.;6.
- [3] Sanjaya U, Conferences TK-SW of, 2018 undefined. Implementation of Personality Principle in the Termination of Village Ground Treasure Utilization No. 143/1728 Between PB. Rancah Karya and Catur Tunggal Village. Shs-ConferencesOrg n.d. https://doi.org/10.1051/shsconf/20185406002.
- [4] Arini H, Munir M, Akta DD-J, 2018 undefined. Juridical Review on Asset Management of Land Rights for Roe Building Which Has Run Out Time (Analysis Decision Dispute in PT. Citra Mandiri, Central Java). JurnalUnissulaAcId 2018;5:523.

- [5] Kurninato JOL& LRV; CA, Kusumo AW. Juridical Analysis of Employment Relationship (Employees-Employers) in the Aquaculture Sector. JournalUnnesAcId 2020;1:201–14. https://doi.org/10.15294/jllr.v1i1.35451.
- [6] Aminuddin dan Zainal Asikin, 2006, Pengantar Metode Penelitian Hukum. Jakarta: Raja Grafindo Persada; n.d.