



Juridical analysis of handling criminal cases of unauthorized land use at Tapanuli Selatan police resort

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Abstract

This study aims to juridically analyze the handling of cases involving the unauthorized use of land, focusing on a case study at the South Tapanuli Police Resort. The background of this research is the increasing number of land disputes involving unauthorized land use, which often lead to legal and social conflicts within the community. The main research question is: how are the procedures and effectiveness of law enforcement in handling such cases at the South Tapanuli Police Resort? The research employs a qualitative approach with normative juridical analysis, involving legal document studies, interviews with law enforcement officers, and direct observation of case handling processes. The results indicate that although the legal procedures applied are in accordance with existing regulations, there are several implementation challenges, such as limited human resources, lack of coordination among relevant agencies, and resistance from the local community. The conclusion of this study suggests that to improve the effectiveness of handling cases of unauthorized land use, efforts are needed to enhance inter-agency coordination, increase human resource capacity, and intensify legal socialization among the public. These findings provide significant contributions to the development of more responsive and fair law enforcement policies for resolving land disputes in Indonesia.

Keywords: Law enforcement, land disputes, south tapanuli, criminal acts, juridical analysis

Introduction

Land is a divine gift from Almighty God to humanity, serving as a fundamental necessity from birth to death. Humans require land for habitation and as a source of sustenance. Cosmologically, land represents the place where humans live, work, and derive their livelihood, encompassing dimensions of economy, society, culture, politics, and ecology. Throughout human history, land has been the most crucial factor in determining production across all phases of civilization. Land not only holds significant economic value but also embodies philosophical, political, social, and cultural significance. Consequently, it is not surprising that land remains a treasured asset, consistently sparking complex and intricate social issues (Siregar, 2011).

The control over land can be interpreted in three aspects: juridical, civil, and public. This understanding involves the physical possession of land in these three dimensions (Ramadhani, 2019) ^[14]. It is essential that the location of one's land be clearly identified and documented (Ramadhani, 2017) ^[11]. For human life, land plays a vital role as people have an inherent and perpetual connection with it. However, the ownership of land does not automatically include the ownership of plants and buildings on it (Ramadhani, 2018a) ^[12]. In the Republic of Indonesia, land is a primary natural resource, deeply significant to its people and strategically crucial for meeting the diverse and growing needs of the nation both domestically and internationally (Ilhamdi, 2016) ^[5].

Ownership of buildings on someone else's land is based on agreements between the primary landholder and the secondary right holder, which create various land rights over the buildings (Ramadhani, 2018b) ^[13]. Currently, numerous land disputes occur in Indonesia, including land encroachment, unauthorized occupation, planting on

someone else's land, crop damage, and fraud, often leading to complex legal battles. These disputes arise because land not only has high economic value but also cultural, philosophical, political, social, and cultural significance, leading to frequent claims over the same land by different parties (Saifuddin & Widodo, 2020) ^[15].

Unauthorized land use is not a new phenomenon in Indonesia. Such actions, often referred to as land encroachment, involve unlawfully taking possession of another's property without legal authorization, essentially disregarding laws and regulations. This illegal conduct is considered a criminal offense. Various forms of unauthorized land use frequently occur, including physical occupation, illegal cultivation, and the unauthorized sale of land rights.

Illegal land encroachment is a violation of the law and can be classified as a criminal offense, though it often involves civil disputes. In Indonesian legal practice, it is not uncommon for disputes fundamentally rooted in civil law to be escalated to criminal proceedings. This dual nature of the issue poses a challenge for law enforcement agencies, particularly for police investigators handling such cases. As primary gatekeepers in the criminal justice process, investigators must thoroughly examine all legal facts and evidence before advancing cases that intertwine criminal allegations with civil elements. This comprehensive approach ensures that justice is served for all parties involved.

One of the hallmarks of a legal state is the provision of legal guarantees and protections for the rights of its citizens. The purpose of law encompasses order, justice, and legal certainty, including the protection of land rights holders. In human life, land is inextricably linked to human activities, as it is the foundation upon which life is conducted and continued (Sutedi, 2007) ^[20].

One of the primary reasons for land conflicts across the archipelago is the weak legal framework governing land encroachment offenses. Additionally, the procedural complexities at the investigation and inquiry levels exacerbate the issue. The ambiguity in whether to resolve such cases under civil or criminal procedural law and the inadequacies of the relevant statutes often impede the effective resolution of land encroachment cases. Consequently, unlawful land encroachment continues to proliferate, leading to persistent conflicts. Even when these cases are processed criminally and reach a verdict in court, the judgments often lack enforceable power to reclaim the encroached land.

Land holds significant importance for society in daily life. In South Tapanuli Regency, instances of unauthorized land use have been found in various areas with diverse circumstances. This study addresses these unauthorized land use issues, highlighting how some community members in South Tapanuli Regency exploit others' land without permission.

To provide novelty to this research, the following previous studies related to the theme are presented:

Silitonga *et al.* (2021) ^[17] found that Perpu No. 51 of 1960 regulates the criminal offense of unauthorized land use, with law enforcement processes starting from reporting, investigation, to prosecution. However, challenges include distinguishing between criminal and civil cases, dual regulations, authenticity of ownership evidence, overlapping evidence, and interference from certain individuals (Silitonga *et al.*, 2021) ^[17]. Marbun *et al.* (2021) ^[7] indicated that land encroachment offenses are regulated under Law No. 51 Prp of 1960 and Article 385 of the Criminal Code, with contributing factors being owner negligence, victim ignorance, high land prices, and sales without proof (Marbun *et al.*, 2021) ^[7]. Silaban *et al.* (2019) ^[16] noted that only the Directorate of General Criminal Investigation at the North Sumatra Police investigates unauthorized land use, as per Article 166(3)(f) of Police Regulation No. 22 of 2010, resulting in low case resolution rates (17.56%-48.7%), potential case backlog, and loss of public trust (Silaban *et al.*, 2019) ^[16].

This research aims to examine and analyze the role of the police in handling criminal cases of unauthorized land use. The main focus is to understand how the South Tapanuli Police Resort manages such cases, including the procedures followed and the outcomes achieved in law enforcement. Additionally, this research seeks to identify and analyze various obstacles encountered in the legal enforcement process of unauthorized land use offenses within the jurisdiction of the South Tapanuli Police Resort. This analysis is conducted from the perspective of the theory of legal effectiveness, allowing a comprehensive assessment of the factors influencing the success and efficiency of law enforcement.

Method

This type of research is empirical legal research using a sociological (socio-empirical) approach (Efendi & Ibrahim, 2018) ^[3]. Socio-empirical research involves empirical facts derived from human behavior, including verbal behavior obtained through interviews and actual behavior observed directly. The approaches utilized by the authors are the statute approach and the case approach. The statute approach involves using legislation and regulations

(Marzuki, 2005) ^[8]. While the case approach requires understanding the ratio decidendi, the legal reasoning employed by judges in reaching their decisions (Marzuki, 2005) ^[8].

Legal research aims to understand and depict the status and functioning of legal norms within society. Given this objective, the research tends to be descriptive in nature. Descriptive research merely portrays the state of an object or event without attempting to draw universally applicable conclusions (Butarbutar, 2018) ^[2].

This study aims to analyze the role of the South Tapanuli District Police in handling cases of unauthorized land use, focusing on the procedures of law enforcement and the challenges encountered from the perspective of the theory of legal effectiveness. The research data comprises primary and secondary data. Primary data were collected from the field through written interviews and case documents at the South Tapanuli District Police. Secondary data include official documents and legal publications, such as textbooks, legal dictionaries, and court decision commentaries. The primary legal materials used in this research include the 1945 Constitution of the Republic of Indonesia, Law No. 5 of 1960 on Basic Agrarian Principles, the Criminal Code, the Civil Code, Government Regulation in Lieu of Law No. 51 of 1960, and case documents from the South Tapanuli District Police.

This study employs two data collection methods: field research and library research. Field research was conducted through written interviews with the Head of Criminal Investigation at the South Tapanuli District Police to gather primary data related to the handling of unauthorized land use cases. Library research was conducted both offline by visiting bookstores and libraries, and online through internet searches to gather secondary data relevant to the study.

Result and Discussion

The Role of the South Tapanuli District Police in Handling Cases of Unauthorized Land Use

The police serve as a state apparatus for law enforcement, tasked with maintaining national security, upholding the law, and providing public protection and service. According to Article 30, paragraph (4) of the Constitution of the Republic of Indonesia, the role of the police is defined as follows: "The Indonesian National Police, as a state apparatus, maintains public security and order, protects, nurtures, and serves the community, and upholds the law."

Under this regulation, only the police and specially authorized civil servants can conduct investigations within the criminal justice system. This means that the police are directly involved in law enforcement for all criminal offenses, including unauthorized land use or land encroachment. As state apparatus responsible for maintaining public order and security, as well as for providing protection, nurturing, and service to the community, the police also play a crucial role in enforcing the law against perpetrators of land encroachment. This is explicitly stated in Article 3 of Law No. 2 of 2002 on the Indonesian National Police, which asserts that the police aim to establish the rule of law. The police occupy a central position in law enforcement due to their direct interaction with the community.

With its extensive network reaching down to the sub-district level, the police are more competent in addressing criminal offenses related to land encroachment or unauthorized land

use compared to other law enforcement agencies. Article 19 of Law No. 5 of 1960 on Basic Agrarian Principles (UUPA) stipulates that the authorities responsible for land registration are accountable for ensuring legal certainty over property. Registered land comes with proof of ownership attached, serving as a powerful tool to demonstrate ownership. In other words, a land rights certificate is crucial for the rightful holder, as it is a legitimate proof of ownership and a legally protected title.

Legal protection for the holders of basic rights certificates must be emphasized, as it constitutes a criminal offense regardless of the forgery of documents as outlined in Article 263, Paragraphs 1 and 2 of the Indonesian Criminal Code (KUHP). This applies to anyone who creates, falsifies, or modifies a document that can serve as evidence of a right, obligation, or agreement. For the purpose of using or directing others to use it, the penalty is six years of imprisonment if the use of the forged document results in harm. Furthermore, according to Paragraph (2), anyone who knowingly uses a false or forged document as if it were genuine is subject to the same penalty if the use of the document can cause harm.

Forgery, including signature falsification, is a critical concern addressed in this article. Land disputes, particularly involving duplicate certificates, can be resolved through various means. These include reaching an agreement through mediation facilitated by village heads, arbitration, and alternative dispute resolution mechanisms. However, it is not uncommon for such disputes to be taken to court multiple times. To effectively combat land mafia activities, especially with the increasing incidence of land disputes orchestrated by these criminal networks, the relevant laws must be applied effectively.

Several laws govern this matter, yet to protect landowners from the malicious actions of land mafias—especially when they resort to bribing government officials to secure favorable court decisions—there has been a lack of effective governmental intervention. Although the Agrarian Law has been enacted, its enforcement has not been effective in eradicating land mafia activities. Consequently, investigators frequently face numerous challenges in uncovering land mafia cases. They must not only resolve the cases but also address issues related to the legalization of land ownership documents.

In the face of these numerous issues, Presidential Regulation Number 18 of 2021 concerning Administrative Rights, Land Rights, housing units, and Land Registration, rights to land, residency, and other registered rights have also come into effect. This regulation provides legal certainty to rights holders, making it easier to identify oneself as the rightful owner of the relevant rights. Furthermore, protecting the general public as victims of land mafia activities necessitates criminal sanctions against individuals involved in land mafia activities who are seen to violate existing laws. Land itself is essentially a civil matter, and appropriate criminal enforcement will effectively eradicate land mafia activities, especially when the resulting losses can amount to hundreds of millions or billions. In essence, this underscores the importance of fair agricultural restructuring and reform (Sulistyaningsih, 2021) ^[19].

Handling of South Tapanuli Resort Police in Dealing with Cases of Unauthorized Land Use

Law enforcement, as the implementation of policy in combating the criminal act of land possession transferred without rightful ownership or authority, essentially utilizes criminal legal means (penal policy), known as "criminal legal policy" or "criminal legal policy," and non-penal means. This criminal legal policy is one component of modern criminal science alongside criminology and criminal law (Arif, 2004) ^[1]. Law enforcement against the criminal act of unauthorized land use within the jurisdiction of the South Tapanuli Resort Police includes, among others:

1. Every landowner or manager claiming ownership must have valid evidence of land rights, such as possessing a Land Ownership Certificate (SHM).
2. In every land transaction transferred to another party, the seller must provide the signature and identification card (KTP) of the rightful heir in addition to their own.

With such resolution, law enforcers find it easier to handle cases of Unauthorized Land Use Crime within the jurisdiction of the South Tapanuli Resort Police (Interview with AKP Rudy Saputra, Head of Criminal Investigation Unit of South Tapanuli Resort Police, 2023). Land rights held or owned by rights holders naturally come with certain limitations of authority. These limitations have been outlined by the Agrarian Law in accordance with the type of rights acquired and are stated in the Land Ownership Certificate. As indicated by the title, land rights not only entail authorities as a form of right but also carry obligations in defending those rights over a piece of land. The discrepancy between rights and obligations continually gives rise to legal issues associated with land known as disputes, conflicts, and land cases.

Unauthorized land use also falls within the realm of crime, synonymous with a legal violation. Crime is an intentional act (*dolus*) performed knowingly with a specific purpose to benefit oneself at the expense of others or society (Ramadhani, 2016) ^[10]. Unauthorized Land Use Crime is a violation of the law. Indonesia is a country governed by the rule of law, and individuals committing criminal acts will be subject to punishment. Within the jurisdiction of the South Tapanuli Resort Police, there have been 2 (two) cases of criminal law enforcement resulting in legally binding court decisions as follows:

▪ **Case in Decision Number 16/Pid.C/2021/PN. Psp**

This decision addresses the criminal offense of unauthorized land use by the defendant, Adiria Hulu. On Saturday, April 17, 2021, around 08:00 WIB in Parsadaan KUD Langkimat Village, Simangambat District, North Padang Lawas Regency, the defendant was found by the reporter, Kharani Nasution, and witnesses to have occupied the reporter's land. The defendant had extended the roof of his house onto the reporter's land, infringing an area of 1 x 15 meters, and had removed a wooden fence erected by the reporter. The defendant claimed his occupation of the land was based on a Sale and Purchase Agreement dated April 15, 2015, and had constructed his house entirely on that land. According to witness statements from Khairani Nasution, Karnel Harahap, Toga Langit Harahap (Head of Parsadaan KUD Hamlet), and Humala Pontas Harahap (Head of Langkimat Village), the defendant had occupied the reporter's land based on a Land Transfer Deed measuring 4 x 15 meters

given by Toga Langit Harahap to Khairani Nasution on April 15, 2016. As a result of the defendant's actions, the reporter was unable to use their land.

▪ **Case in Decision Number 16/Pid.C/2022/PN. Psp**

This decision adjudicates the criminal offense of unauthorized land use by the defendant, Risnawati Siregar. On Monday, January 24, 2022, around 09:00 WIB, the reporter, Ihwan, discovered that his land in Batu Nanggar Village, Batang Onang District, North Padang Lawas Regency, had been occupied by the defendant over an area of 1.3 hectares by tapping rubber trees belonging to the reporter. The defendant claimed the land as her own; however, according to a Compensation Agreement between Sarman Hasibuan (the defendant's husband) and Ihwan, signed by both parties and witnessed by Ali Muda Siregar, Markot, Hira Hasibuan, and the Head of Batunanggar Village, Pandapotan, on March 5, 2020, the land legally belonged to Ihwan. The defendant claimed ignorance of the sale of the land by her husband, Sarman Hasibuan. According to witness Nurholilah Harahap (Ihwan's wife), the Compensation Agreement had been provided to the defendant for her husband's signature. The Padang Sidempuan Panel of Judges found the defendant, Risnawati Siregar, guilty of using the land without authorization from the rightful owner and sentenced her to one month of imprisonment, which is suspended for a probationary period of two months unless otherwise directed by the judge.

Challenges Faced by the South Tapanuli Resort Police in Law Enforcement Against Unauthorized Land Use

The challenges in the legal structure for law enforcement against unauthorized land use in South Tapanuli Resort Police include the coordination between law enforcement agencies, specifically between the South Tapanuli Police and the prosecutors at the South Tapanuli District Attorney's Office, which does not operate effectively at both theoretical and normative levels, as well as in practice (Interview with AKP Rudy Saputra, Head of Criminal Investigation Unit, South Tapanuli Resort Police, 2023).

Both the police and the prosecutors play crucial roles in bringing cases before the court. They are jointly responsible for managing and controlling crime in society. The success of criminal case handling heavily depends on the effective collaboration of these two institutions. However, it is often reported that there is a lack of harmony between them in handling criminal cases. The police's investigation files are frequently delayed in receiving the P-21 form, indicating completeness, from the prosecutors. The P-19 form from the prosecutors, which requests additional information or corrections to the investigation files, can signal the prosecutors' doubts about the police's work. While the prosecutors are within their rights to request additional information, the back-and-forth exchange of case files hampers the efficiency of the criminal justice process (Elnizar, 2020).

Ideally, legal coordination is a crucial factor for empowering the public through the legal system. Due to the poor coordination between law enforcement agencies, there is a growing call from justice seekers and legal observers for a more integrated approach to justice, known as the integrated justice system (Prakoso, 2013) ^[9]. One of the main challenges in law enforcement against unauthorized land use in the jurisdiction of the South Tapanuli Resort

Police is the lack of evidence of ownership, specifically the absence of the Land Ownership Certificate (SHM), when reporters file complaints about unauthorized land use. This lack of documentation complicates the efforts of law enforcement officers in handling such cases.

Reporters in South Tapanuli Regency often only possess a Land Certificate (SKT) and land transfer rights. Additionally, there are instances of signature forgery on the land certificates, with witnesses being the only ones aware of the land's boundaries and objects. In the jurisdiction of the South Tapanuli Resort Police, unauthorized land use frequently occurs during law enforcement processes, particularly involving land ownership that lacks an SHM (Land Ownership Certificate), as many individuals do not possess this certificate. The BPN regulations assert that the SHM is the valid proof of land ownership. Therefore, in cases of unauthorized land use, the complainant must have an SHM to report the incident to the police to prevent unauthorized use of land without the true owner's permission (Interview with AKP Rudy Saputra, Head of Criminal Investigation Unit, South Tapanuli Resort Police, 2023).

The SKT (Land Certificate) serves as a basis for land ownership rights that have not been converted or for state lands occupied by the community, either intentionally or under the arrangement of the village head and endorsed by the sub-district head, as if the land were someone's property or fell under the category of customary rights. Based on the above explanation, it can be understood that the SKT represents ownership rights over cultivated land.

The SKT is issued by the sub-district head based on Article 11 of the Minister of Home Affairs Regulation No. 6 of 1972 concerning the Delegation of Authority for Granting Land Rights, which essentially grants the sub-district head the authority to permit land opening not exceeding 2 hectares. In cases where land ownership exceeds the maximum area stipulated by the government, it is not uncommon for landowners to possess land exceeding the prescribed limit. Sometimes, landowners hold extensive land, up to hundreds of hectares, by dividing ownership evidence (Kuncoro, 2020) ^[6].

Ownership is crucial for individuals to lead their lives effectively. The greater the value of ownership over an item, the higher the appreciation accorded to it. Land, in particular, holds significant value for humanity and is especially critical for the people of Indonesia. For Indonesians, land is a fundamental issue, as evidenced by the numerous civil and criminal cases related to land disputes brought before the courts. These disputes often involve inheritance conflicts, debt disputes with land as collateral, administrative disputes regarding land certificate issuance, and other unlawful acts. The prevalence of land-related cases underscores the central role land plays in Indonesian life and economy.

In line with this, the principle of nationality upheld by Indonesia regarding its land is reflected in the Basic Agrarian Law (UUPA). As a territory owned by a sovereign and united nation, the entire Indonesian archipelago is a unified homeland for all Indonesians, with an eternal bond. This principle has significant implications for land ownership in Indonesia, stipulating that only Indonesian citizens are allowed to own land. This is a consequence of sovereignty; land is a fundamental requirement for the existence of a state. Therefore, land can only be owned by

the citizens of a country that controls the entire territory. If foreign nationals were permitted to own land in Indonesia, the ownership of land would gradually shift to foreigners, jeopardizing the nation's sovereignty (Sutedi, 2009) ^[21].

Conclusion

The police play a direct role in law enforcement against criminal acts, including land encroachment, as stipulated in Article 3 of Law No. 2 of 2002 concerning the Indonesian National Police, which states that the police aim to uphold the law. As state apparatus responsible for maintaining public security and order, providing protection, guidance, and service to the community, the police also enforce laws against perpetrators of land encroachment. Several factors contribute to unauthorized land use within the jurisdiction of the Tapanuli Selatan Police. These include lands that have long been unused, leading others to clean and manage these lands without the owner's permission. Additionally, there is a suspicion that many people are aware that the owners or managers of the land do not have legitimate rights over it, thus feeling free to work on the land without authorization. Law enforcement against unauthorized land use in the Tapanuli Selatan Police jurisdiction has been ineffective due to several reasons. These include relatively low criminal penalties as stipulated in Law No. 51 of 1960, poor coordination between the Tapanuli Selatan Police and prosecutors at the Tapanuli Selatan District Attorney's Office, and numerous community reports lacking evidence of land ownership in the form of ownership certificates (SHM).

It is recommended that the Tapanuli Selatan Police carry out their roles in accordance with their main duties, functions, and authorities as regulated by applicable laws in handling cases of unauthorized land use in their jurisdiction. The community within this jurisdiction is also advised to respect and acknowledge each other's land ownership rights to prevent disputes. Furthermore, it is hoped that law enforcement officers can find effective and efficient solutions in handling unauthorized land use cases in the Tapanuli Selatan Police jurisdiction to resolve land disputes properly.

References

1. Arif BN. Kebijakan Hukum Pidana. Citra Aditya Bakti, 2004.
2. Butarbutar EN. Metode Penelitian Hukum. PT. Refika Aditama, 2018.
3. Efendi J, Ibrahim J. Metode Penelitian Hukum: Normatif dan Empiris. Prenada Media Group, 2018.
4. Elnizar NE. Polisi dan Jaksa dalam Sistem Peradilan Pidana, Kuasa di Tangan Siapa? Hukumonline.Com, 2020.
5. Ilhamdi. Tinjauan Yuridis Tentang Hak Atas Tanah Perusahaan di Kawasan Industri di Indonesia. DE LEGA LATA: Jurnal Ilmu Hukum, 2016;1(2):329–48. <https://doi.org/10.30596/DLL.V1I2.797>
6. Kuncoro W. 97 Risiko Transaksi Jual Beli Properti. Raih Asa Sukses, 2020.
7. Marbun J, Ginting RK, Harahap AZ. Tindak Pidana Penyerobotan Tanah Dalam Perspektif Hukum Pidana. Jurnal Rectum, 2021;3(2):226–38.
8. Marzuki PM. Penelitian Hukum, 2nd ed. Kencana Prenada Media Group, 2005.
9. Prakoso A. Kriminologi dan Hukum Pidana. Laksbang Grafika, 2013.
10. Ramadhani R. Penanggulangan Kejahatan Terhadap Tanah. Jurnal EduTech, 2016, 2(2).
11. Ramadhani R. Jaminan Kepastian Hukum yang Terkandung dalam Sertipikat Hak Atas Tanah. DE LEGA LATA: Jurnal Ilmu Hukum, 2017;2(1):139–57. <https://doi.org/10.30596/DLL.V2I1.1144>
12. Ramadhani R. Buku Ajar: Hukum Agraria (Suatu Pengantar). UMSU Press, 2018.
13. Ramadhani R. Konstruksi Hukum Kepemilikan Bangunan di Atas Tanah Hak Milik Orang Lain Berdasarkan Perjanjian Build Operate and Transfer (BOT). EduTech: Jurnal Ilmu Pendidikan Dan Ilmu Sosial, 2018, 4(1). <https://doi.org/10.30596/EDUTECH.V4I1.1885>
14. Ramadhani R. Dasar-Dasar Hukum Agraria. Pustaka Prima, 2019.
15. Saifuddin B, Widodo T. Penyelesaian Tindak Pidana yang Didalamnya Terdapat Perselisihan Perdata (Suatu Tinjauan Normatif). Jurnal Ilmu Hukum Dan Humaniora, 2020;7(1):30–6. <https://doi.org/10.31604/justitia.v7i1.30-36>
16. Silaban J, Minin D, Zul M. Peran Polri dalam Menyelesaikan Perkara Pemakaian Tanah Tanpa Izin dari yang Berhak atau Kuasanya yang Sah. ARBITER: Jurnal Ilmiah Magister Hukum, 2019;1(2):167–74. <https://doi.org/10.31289/arbiterv1i2.119>
17. Silitonga N, Lubis MA, Siregar SA. Analisis Yuridis Penegakan Hukum Terhadap Tindak Pidana Pemakaian Bidang Tanah Tanpa Izin Yang Berhak Atau Kuasanya Di Wilayah Hukum Kepolisian Daerah Sumatera Utara (Polda-Su). Jurnal Retentum, 2021, 3(1). <https://doi.org/10.46930/retentum.v3i1.904>
18. Siregar TA. Pendaftaran Tanah Kepastian Hak [Skripsi]. Universitas Sumatera Utara, 2011.
19. Sulistyaningsih R. Reforma Agraria di Indonesia. Perspektif, 2021;26(1):57–64. <https://doi.org/10.30742/perspektif.v26i1.753>
20. Sutedi A. Peralihan Hak Atas Tanah dan Pendaftarannya. Sinar Grafika, 2007.
21. Sutedi A. Hukum Perburuhan. Sinar Grafika, 2009.