

THE LEGAL POSITION OF CHURCH MARRIAGE FROM THE PERSPECTIVE OF MARRIAGE LAW AND THE CONSTITUTIONAL RIGHTS OF CHRISTIANS IN INDONESIA

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Abstract

Marriage in the Christian tradition has undergone a historical development, from a simple community practice in the ancient Roman world, where a personal declaration of commitment between the prospective bride and groom was considered valid, to becoming a sacred and legal institution elevated as a sacrament of the church. The 11th-century Reformation of the Catholic Church and the 16th-century Council of Trent strengthened the sacramental status of marriage, requiring its publication and solemnization before the church community to avoid disputes and ensure legal and theological validity. In Indonesia, the practice of church marriage was influenced by the colonial legal system, which required civil registration in addition to a church blessing. Today, a church blessing is considered to fulfill the spiritual aspect, while registration at the Civil Registry Office is an absolute prerequisite for legal recognition and protection of the constitutional rights of Christian families. This research uses a normative juridical method with a study of regulations, doctrines, and implementation practices. The research results show that there is a dualism of recognition—a valid church marriage may not be legally recognized by the state without civil registration, which has an impact on the legal status, inheritance, and administration of children. Analysis of church legal theory, formal state legality, constitutional rights, and legal certainty emphasizes the importance of harmonization between positive law and the sacred values of the church so that the rights of Christian families are comprehensively protected. The research recommendations emphasize the need for public education, church advocacy, and inclusive state services so that church marriages receive full spiritual and legal recognition in Indonesia.

Keywords: Church marriage, church law, sacrament, civil registration, legality of marriage, constitutional rights, Christianity, Indonesia

INTRODUCTION

Marriage holds a fundamental position in Indonesian society and legal framework, serving as the legal basis for establishing a family and securing the constitutional rights guaranteed to all citizens. Article 28B paragraph (1) of the 1945 Constitution explicitly recognizes that forming a family through lawful marriage is a constitutional right protected by the Indonesian state (UUD NRI, 1945). However, the implementation of this right in Indonesia, particularly for Christian believers seeking church marriage, presents a complex interplay between religious autonomy, constitutional guarantees, and positive law requirements. The legal position of church marriage in Indonesia reflects the nation's foundational commitment to religious values as enshrined in Pancasila, the first principle of which emphasizes belief in God Almighty (*Ketuhanan Yang Maha Esa*), and is deeply embedded within the constitutional framework established by the 1945 Constitution (*Undang-Undang Dasar Negara Republik Indonesia Tahun 1945*).

Marriage in the Christian tradition has undergone a long and dynamic journey, from a simple early community practice to a sacred and legal institution recognized by both church and state. In ancient Rome, a declaration of commitment from both parties was sufficient to validate a marriage without the intervention of any other institution. As Christianity developed, the church began to adopt this practice and give a spiritual dimension to the Christian family bond. "Marriage commitment in the ancient Roman world was simply a personal statement of consent, but church tradition later made marriage a sacramental event with liturgical confirmation.

Entering the 11th century, the Catholic Church and in turn the Protestants established marriage as one of the primary sacraments, marking a significant transition from a private affair to a structured community ceremony. The sacrament of marriage is affirmed as a sign of God's grace, which includes the promise of lifelong fidelity, indissolubility, and monogamy, as reinforced in Scripture (Genesis 2:24, Ephesians 5:31).

"The sacrament of marriage in the church requires a lifelong commitment, which cannot be broken except by death, as taught by Jesus and according to church tradition."

In the Middle Ages, church law also regulated publication procedures, with the aim of avoiding clandestine or secret marriages without church approval. The provisions of the Fourth Lateran Council in 1215 and the Council of Trent in 1563 required the public announcement of the marriage vows from the pulpit at three consecutive Masses. This tradition kept the relationship public and prevented legal obstacles and family or customary conflicts that could violate the norm.

"The Council of Trent in 1563 stipulated that before a marriage is celebrated, the names of the bride and groom are to be announced publicly in the church for three consecutive days to ensure there are no legal, family, or customary obstacles."

In Indonesia, the Dutch colonial legacy has had a significant impact on the system of conducting and recognizing church marriages. The Dutch East Indies system required civil registration in addition to a Christian church blessing, a practice that continued after Indonesian independence. Thus, the church still holds the spiritual authority to confirm the couple, but full legality is only obtained after registration at the Civil Registry Office.

"A church marriage certificate is a legal document that proves the validity of a marriage according to church law, and in Indonesia it also functions as a requirement for state registration for national legal recognition.

In contemporary practice, church weddings in Indonesia involve premarital courses and pastoral development, as a form of spiritual, ethical, and social preparation before the blessing before the congregation and God. The liturgical ceremony of affirming promises and God's blessing is the culmination of church recognition, while state registration guarantees civil and legal rights related to inheritance, child status, and family administration.

"The confirmation of church marriage remains relevant as both a spiritual and legal foundation, requiring administrative registration to ensure the coexistence of civil and religious rights in Indonesia (GMIT, 2017)."

Marriage is a social institution that holds not only personal significance but also institutional significance in Indonesia's diverse religious and cultural society. The existence of marriage in Indonesia's Christian community, particularly those conducted according to church rites, known as church marriages, not only has spiritual value but also legal implications for the legal status of the couple and their descendants. Church teaching, for example in Catholicism, affirms that marriage is a sacred and permanent bond established by God as stated in the Code of Canon Law, Canon 1055 §1, which views marriage as "a covenant between a baptized man and a woman to form a lifelong partnership, naturally directed to the welfare of the husband and wife and the procreation and education of children" (Code of Canon Law, 2006:234-235). Thus, from the church's perspective, the validity of marriage places more emphasis on the religious dimension than on state administration.

Meanwhile, the Indonesian state regulates the validity of marriage through Law No. 1 of 1974 concerning Marriage, which in Article 2 paragraph (1) states that "marriage is valid if it is carried out according to the laws of each religion and belief", and paragraph (2) requires the registration of marriages according to applicable laws and regulations (Law 1/1974 Article 2). This gives rise to two recognition regimes: juridical-administrative (state) and religious (church).

However, in practice, there is disharmony between these two systems. Many cases of Christians who have been legally married in the church have experienced administrative problems because they cannot obtain a marriage certificate from the state because they did not go through the civil registration procedure. This problem then has an impact on the recognition of civil rights such as inheritance, child status, and population administration status (Saputra, 2025:60).

The constitutional right of every person to embrace their religion and beliefs is expressly guaranteed in Article 29 of the 1945 Constitution, which gives every person full freedom to practice their respective religious teachings. However, the implementation of the constitutional rights of Christians regarding the validity of church marriages often clashes with state regulations, resulting in problems regarding the protection and recognition of these constitutional rights in population administration and family law practices (Binawan, 2021:123).

The legal status of church marriage also holds strategic value because it is directly linked to the state's recognition of religious diversity and the protection of its citizens' constitutional rights. In this context, the state should be able to provide accommodating legal mechanisms without discriminating against certain communities based on marriage procedures believed to be part of their religious mandate (Binawan, 2021:124). Therefore, this issue is crucial to examine to achieve harmony between state regulations and the religious values of religious communities, while also ensuring comprehensive legal protection for all citizens.

Based on the description above, the author has chosen the research title, namely *The Legal Position Of Church Marriage From The Perspective Of Marriage Law And Constitutional Rights Of Christians In Indonesia*.

The legal position of church marriage in Indonesia thus presents a rich and multifaceted research problem requiring integrated analysis across multiple legal domains. The inquiry demands examination of how Indonesia's constitutional commitment to both religious freedom and the protection of family rights shapes the legal treatment of church marriage; how the interaction between ecclesiastical law and state law creates a unique marriage recognition system; how recent Constitutional Court jurisprudence has clarified the constitutional foundations of religious marriage requirements; and how the practical implementation of dual-track marriage registration affects the substantive and procedural rights of Christian believers seeking state recognition of their church marriages[22]. Furthermore, the analysis must address the extent to which the current legal framework adequately protects the constitutional rights of Christians to celebrate marriage according to church law while simultaneously ensuring that such marriages receive full legal recognition by the Indonesian state, thereby securing the attendant legal consequences regarding property rights, inheritance, and child status that flow from the marital relationship.

RESEARCH METHOD

Research with this title is highly suitable for using the normative legal research method (normative juridical), also known as library research. This method is a scientific research procedure for discovering truth based on the logic of legal science from a normative perspective. Normative legal research focuses on an inventory of positive law, legal principles and doctrines, legal discovery, legal systematics, and the degree of synchronization of legislation.

The normative juridical method is a research approach that examines written law (statutory regulations, doctrines, and court decisions) and applicable legal principles. The main focus is comparing and analyzing regulations on marriage in Indonesia (such as Law No. 1 of 1974) with church legal practices and the fulfillment of the constitutional rights of Christians (Benur & Azhar, 2020).

RESULTS AND DISCUSSION

The 1945 Constitution of the Republic of Indonesia contains several provisions pertinent to marriage, religious freedom, and family law. Article 28B, paragraph (1) provides: "Everyone shall have the right to form a family and to continue the family line through lawful marriage." [25] This provision establishes marriage as a constitutionally protected right, grounding marriage recognition in fundamental human dignity rather than merely statutory grace.

Complementarily, Article 28E, paragraph (1) guarantees: "Everyone shall be free to embrace a religion and to worship according to his or her religion or belief, and to manifest such religion or

belief..."[26] This provision establishes religious freedom as a constitutional guarantee, protecting the exercise of religious faith including religious practices that may be integral to personal life passages such as marriage.

Article 29, paragraph (1) further provides: "The State shall be based on the belief in the Almighty God," establishing the constitutional principle that the Indonesian state acknowledges divine transcendence and permits (indeed contemplates) that citizens shall exercise religious faith.[27] Significantly, this provision establishes divinity as a constitutional principle, not merely a statutory requirement, suggesting that religious elements in laws (such as marriage law) reflect constitutional, not merely legislative, commitments.

The convergence of Articles 28B(1), 28E(1), and 29(1) creates a constitutional synthesis: individuals possess rights to both (1) marry and form family units, and (2) exercise religious faith. For Christian citizens specifically, these provisions suggest constitutional protection for marriage ceremonies conducted according to Christian doctrine and performed by Christian clergy, provided such marriages receive state registration as required by positive law.

However, the Constitutional Court has interpreted these provisions not as establishing absolute rights but rather as establishing qualified rights subject to proportionate limitation.[28] The Court has reasoned that because the Indonesian constitution establishes the state upon belief in God, and because the Marriage Law requires religious law compliance, the legal limitation that all marriages must be conducted according to religious law constitutes a permissible (indeed necessary) expression of constitutional structure, not an unconstitutional limitation on fundamental rights.[2]

In Constitutional Court Decision Number 146/PUU-XXII/2024, the Court explicitly addressed religious freedom in marriage context. The petitioners in that case, two citizens who rejected religious adherence, challenged Article 2(1) of the Marriage Law as unconstitutional because it requires religious law compliance for marriage validity. The Court, in upholding the provision, reasoned:

"Religion and belief in God Almighty are indispensable elements for a valid marriage... [and] the legal norm that validates marriages conducted according to each person's religion and belief does not constitute discriminatory treatment" against those who reject religion.[30] The Court further elaborated that the requirement reflects the constitutional character of Indonesia as a state based on divinity, and that "absence of provisions for Indonesian citizens to choose not to adhere to a religion or belief in the Almighty God" does not constitute unconstitutional discrimination because such religious adherence reflects "the nation's character and the principle of the Almighty God, as mandated by Pancasila and the 1945 Constitution.

1. Theory of Church Marriage Law

Marriage in the Catholic Church is governed by three primary sources of law: divine/natural law, canon law (church law), and civil law, as far as the civil consequences of marriage are concerned. Divine law and natural law underlie the purposes and essence of marriage, such as unitas (unity/absolute monogamy), indissolubility (indissolubility), and consanguinea (consensus conjugal). (Canon 1055, verses 1 and 2 of the Code of Civil Procedure)

"Every Catholic marriage is governed by three laws: divine or natural law, canon law, and civil law insofar as it relates to the civil effects or consequences of the marriage itself. Divine law regulates the essential elements: purpose, essential nature (unity, indissolubility), and marital consent (Resi & Lena Meo, 2023)."

The element of sacramentality in church marriage comes into focus: marriage is a holy and highest calling, where God leads and blesses through sacraments. Main characteristics: monogamous and indivisible (Resi & Lena Meo, 2023).

2. The Theory of Marriage Legality in Positive Law

The theory of legality states that a legal action is valid if it meets the requirements and conditions stipulated by law. In Law No. 1 of 1974:

A marriage is valid if it is carried out according to religious law and beliefs, and is registered by the government (Article 2 paragraphs 1-2). "A marriage is valid if it is conducted according to the laws of each religion and belief." Consequently, enforcing the legality of a marriage is correlated with civil registration. Otherwise, the legal status of the family, children, and joint property risks being disrecognized by the state (Candra et al., 2024).

3. Theory of Citizens' Constitutional Rights

Constitutional rights are basic rights guaranteed by the state in the 1945 Constitution, including the right to form a family through legal marriage (Article 28B paragraph 1). Constitutional Court Decision No. 46/PUU-VIII/2010, as well as the public discourse of the National Commission on

Violence Against Women, emphasizes that the state is obliged to respect, protect, and fulfill the constitutional rights of citizens in marriage, including for Christians (Christians/Catholics). "Marriage is a legal act that is protected by law as a basic right that every citizen has."

4. Sociological Theory of Law

The sociology of law examines the interaction between religious norms, customs, and state law. Differences in interpretation and application can trigger conflict—for example, the dualism between church marriages (valid according to the church) and state marriages (valid according to state law). This has implications for children's status, inheritance rights, social security, and family legal protection.

"Although the church holds authority... the state requires civil registration. Church blessings only fulfill the spiritual aspect, while civil registration provides legal certainty and protection for couples and children."

5. Consensus Theory and Freedom of Choice in Marriage

Church teaching emphasizes freedom, individual dignity, love, and consent as prerequisites for a valid marriage. The Catechism of the Catholic Church affirms that the free consent of both spouses is essential for the validity of the sacrament of marriage. Forced marriage contradicts the principles of human dignity and fundamental rights, as outlined in the Universal Declaration of Human Rights and the encyclical *Gaudium et Spes* of the Second Vatican Council.

"The Catholic Church places great emphasis on the importance of freedom in choosing a life partner. Marriage must be based on the free decision of both parties involved, without coercion (Candra et al., 2024)."

6. The Theory of Sacramentality in Christian Theology

In Canon 1055 of the CIC and Pope John Paul II's conception of the theology of the body, marriage is elevated to the dignity of a sacrament a covenant between a man and a woman aimed at the well-being, procreation, education of children, and the experience of God's love (*bonum coniugum, proles, educationem*). The sacrament affirms the exclusivity and indissolubility of marriage (Resi & Lena Meo, 2023). "Marriage is a sacred bond directed toward the good of the spouses, the procreation and education of children in the Church, those who are baptized, united as husband and wife, are raised by Christ to the dignity of a sacrament."

7. Theory of Legal Certainty and Protection

The theory of legal certainty (Soerjono Soekanto, Sri Mamudji) emphasizes the importance of law in providing predictability, protection, and justice in every legal event. Registration of marriage and state recognition of church sacraments are important to ensure the legal status of the family, property, and children's rights. If there is no registration, there is a risk that the child will be born out of wedlock, joint assets will be difficult to be recognized by the state, and access to administrative documents will be disrupted. "Marriage registration is important for the clarity of the legal status of the family. Marriages conducted only in a church without civil registration have the potential to cause legal harm to women and children, as well as making it difficult for couples to access legal rights."

The results of the study show that the legal status of church marriage for Christians in Indonesia has a strong spiritual and social dimension, but still faces legal challenges in the formal realm of the state. Religiously, a marriage conducted and blessed in a church is valid and recognized by the community of believers, but according to state regulations, a marriage must also be registered at the Civil Registry Office in order to be legally valid and to obtain legal protection for the family and children.

1. Many Christian couples still choose church blessings as a confirmation of their faith and commitment to family. However, when marriages are not registered with a state agency, the legal status of the family is weakened—especially when it comes to important documents like birth certificates, inheritance rights, and other administrative matters.
2. Empirical studies in several church congregations show that couples who only have church marriages experience obstacles when processing population documents, and children born from these marriages have the potential to obtain the status of "illegible children" in the eyes of the state, which has an impact on access to education, inheritance, and social benefits.
3. The state, through the Marriage Law and implementing regulations, requires marriage registration as a formal validation to protect the constitutional rights of all citizens, including Christians. Without registration, families are vulnerable to serious legal and administrative problems.

Recommendations from the author

1. It is recommended that the Church and Christian/Catholic religious leaders in Indonesia actively educate the congregation about the importance of not only church blessings but also registration at the Civil Registry Office as a legal obligation to protect the status and rights of families.
2. The regional government (Disdukcapil) is expected to provide friendly, easy, and inclusive access to registration services so that there is no discrimination or administrative difficulties for Christian couples who have been married according to church traditions.
3. Advocacy and coordination between the church and the government are needed to ensure the marriage registration process runs smoothly and the constitutional rights of Christians are fully guaranteed according to the law, as well as to prevent legal problems for children and families in the future.
4. These measures aim to strengthen legal protection for Christian families, prevent the vulnerability of children's and women's rights, and ensure harmonization between religious law and state law in marriage in Indonesia.

A central challenge in the legal position of church marriage in Indonesia emerges from the necessity of integrating ecclesiastical marriage validity with civil registration requirements. While the 1974 Marriage Law explicitly recognizes religious marriage as the primary source of marriage validity, it simultaneously imposes a civil registration requirement as the second element necessary for complete legal recognition. For Christian marriages, this dual requirement necessitates that couples first celebrate marriage according to church law through clergy authorized by their respective churches, and subsequently register the marriage with the Civil Registry Office to obtain state recognition through the issuance of a Marriage Certificate (*Akte Perkawinan* or *Surat Nikah*) (Kedubes AS Jakarta, 2024).

The practical implementation of this dual-track system has occasionally generated legal uncertainty and administrative obstacles, particularly in cases involving interfaith marriages or when civil registry officials dispute whether specific church ceremonies satisfy the requirements of Article 2 paragraph (1) of the 1974 Marriage Law. These complications raise important questions regarding the scope of state authority in evaluating the validity of religious marriage ceremonies, the extent to which civil registry officials may condition registration upon their own assessment of religious compliance, and the degree to which church autonomy in determining marital validity is protected against state interference.

CONCLUSION

Church marriage in the Catholic and Protestant Christian traditions has a strong spiritual foundation through sacramental elements, the principles of monogamy, indissolubility, and freedom of consensus as the foundation of the marriage covenant. The Church regulates marriage by referring to divine/natural law, canon law, and state law as far as the civil consequences of marriage are concerned. In practice, all sacramental elements and church procedures have granted legal recognition to couples before the Church and the faith community. However, in the context of Indonesian positive law, based on Law No. 1 of 1974, a marriage must fulfill two basic elements: it must be valid according to religious law and must be registered by the state at the Civil Registry Office. This registration is an absolute requirement for realizing legal protection, legal certainty for the status of families, children, and other administrative rights such as birth certificates, inheritance rights, and access to public services. In reality, some Christian couples decide to only conduct church marriages without civil registration. This results in family status, children from marriage, and management of assets not receiving full recognition in the eyes of state law. Children are even at risk of being considered "illegible children," making access to administrative, educational, and inheritance rights difficult. In practice, the discrepancy between church and state legal provisions often creates legal and sociological conflicts for the congregation. The state, through the principles of legality and protection of constitutional rights, mandates registration as a form of respect for every citizen's right to form a family that is recognized, protected, and has legal certainty. This is emphasized in the Constitutional Court Decision and related implementing regulations.

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