

## LEGAL PROTECTION OF HOUSING CONSUMERS DUE TO DEVELOPER'S UNLAWFUL ACT IN BENTIRING VILLAGE, BENGKULU CITY

**Emelia Kontesa**

Faculty of Law, Universitas Bengkulu, Indonesia  
Correspondence author email: [ekontesa@unib.ac.id](mailto:ekontesa@unib.ac.id)

### Abstract

Legal protection places an emphasis on the state or government fulfilling the obligations of the community. In the concept of legal protection, there is a demand for the right to legal protection to be fulfilled if the obligation for the law to fulfill the law is carried out, and there will be restrictions on the legal protection of a person who performs legal acts. Legal protection rests on and originates from the concept of the recognition and protection of human rights. This research is grouped in the humanities field if it is related to the RIP of Bengkulu University. It is very relevant to be examined in accordance with the development of the general principles of good governance, which together can be said to be the principles of good governance. The government must protect the interests of housing consumers who are in good faith because they have made house payments both in installments and in cash and have even obtained certificates of land rights. The final effort is a result of the Criminal Court decision, which states that the developer's unlawful actions have now reached the cassation level. If this decision is legally binding, it will result in the loss of land rights for consumers of Grand Korpri Bentiring housing because the land has become an asset of the Bengkulu city government. This research focuses on the consequences of the developer's unlawful act and his responsibility, as well as what efforts the government can make in relation to the protection of housing consumers. Similarly, the criminal acts committed by the developer should not be charged to consumers or result in the elimination of consumer land rights because the land falls to the state due to the proof of unlawful acts (PMH) from the developer. This is in accordance with the adage *nemo punitur pro alieno delikto*, which means that no one is punished for the actions of others. While civil law liability based on tort (*onrechtmatige daad*) is based on the existence of a legal relationship between housing consumers and developers through a sale and purchase agreement.

**Keywords:** Legal Protection, Housing Consumer, Unlawful Acts, Bengkulu, Indonesia.

### INTRODUCTION

Land acquisition was carried out by the government around 1995–1996; the total area of land acquired was 62.9 ha (sixty-two point nine hectares) located in Bentiring Village and Semarang Village, Bengkulu City. Based on the Decree of the Mayor of the Municipality of Bengkulu Level II No. 01/B.V/PAD/1994 on the Approval of the Project funded from the Regional Budget "Pembangunan" of the Municipality of Bengkulu Level II for the 1994/1995 fiscal year. The amount of APBD funds amounted

to Rp. 150,000,000 (one hundred and fifty million rupiah), which was used for compensation costs to landowners.<sup>1</sup>

With the acquisition, the status of land rights has been transferred from the landowner to the Government of Kotamadya Tingkat II Bengkulu (currently administratively the City of Bengkulu). Juridically, this land becomes a regional asset and is included in the Bengkulu Municipal Government's asset list. Furthermore, this land is planned for low-income civil servants.<sup>2</sup> So through this mechanism, the government provides housing for the community, especially low-income civil servants. Until now, in 2021, around 400 housing units have been built on the land, but in 2015, a legal case originated from complaints from the community, which felt aggrieved because one person sold land and housing commercially to the community, covering 8.7 hectares of the total land of the Bengkulu City Government, covering approximately 62.9 hectares, in Bentiring Permai Village, Muara Bangkahulu District, Bengkulu City.<sup>3</sup> The residential building has been issued a Building Rights Title Certificate in the name of PT TPM. This land is prioritized for the construction of "Grand Korpri" housing. Currently, it has entered the realm of criminal law and is being processed up to the cassation level.

Starting from this case, this research does not focus on criminal law but on the perspective of civil law. This is a very important study related to the legal protection of housing consumers who have paid the price of the house in good faith. In the civil perspective, the rights of the parties to a valid agreement have the value of law for the parties who make it (regulated in Article 1338, paragraph (1) of the Civil Code: "All agreements made legally shall apply as laws for those who make them").(Zainudin, 2020) Because the agreement is a law for the parties, their rights, particularly the rights of housing consumers, obtain legal protection.(RED, 2018) But there is a big problem when the subject and object of a criminal case, let's say the legal subject, is PT. TPM (in the Bengkulu District Court Decision, PT. TPM was found to have committed an unlawful act by attempting to enrich itself). The big problem is that the District Court decision will result in the annulment of the land that has been purchased by consumers who have good faith. Furthermore, housing consumers own the land and houses in dispute, so a court decision with permanent legal force (*in kracht van gewijsde*)(Gustaaf Kusno, 2017) would result in the loss of their rights. The state controls the land, returning it to the assets of the Bengkulu City Government.

---

<sup>1</sup>Data collected from pre-research results in Bentiring Permai Village October 13, 2020.

<sup>2</sup>Low-income people, hereinafter abbreviated as MBR, are people who have limited purchasing power, so they need government support to obtain housing. (Article 1, Point 24) Law Number 1 of 2011 concerning Housing and Settlement Areas. LN 2011 Number 7.

<sup>3</sup>A house is a structure that serves as a livable residence, a means of family development, a reflection of the dignity of its occupants, and an asset for the owner. Amendments to Government Regulation Number 14 of 2016 concerning the Implementation of Housing and Settlement Areas under Number 12 of 2021

Land disputes are caused by differences in values, interests, opinions, and perceptions between individuals or legal entities regarding the status of control, ownership status, and the status of use or utilization of certain land parcels by certain parties.(Hersperger et al., 2015) Parties in disputes feel disadvantaged in their land rights use and control, which are resolved through deliberation or the courts.(Ashar Sinilele, 2017).

## **RESEARCH METHOD**

This addressing the issue of land disputes involving "Grand Korpri" housing consumers and developer PT. TPM, this research uses empirical legal research typology.(Bhat, 2020) The purpose of this research is to explain and explore, in depth and objectively, unlawful acts committed by housing developers, as well as review the legal steps that can be taken by the government to restore consumer rights. The research site is located in Bentiring Permai Village, Muara Bangkahulu District. The approach used in this research is a sociological juridical approach, which aims to understand the applicable law in the social context of society by treating law as real behavior, which is a social symptom.(Kaharuddin, 2023) As respondents, this research involved various parties related to the issue, including housing consumers, the local government of Bengkulu City, the Head of the Bengkulu City Agrarian and Spatial Planning Office/National Land Agency, the Head of Government, the Head of Asset, the Bentiring Sub-District Head, the Bentiring Village Head, Sutardi as the former Village Head, Rizal as the former Head of RT 13 Bentiring Village, as well as ten community members consisting of land and house owners and witnesses who have knowledge of the history of the disputed land. Interviews collected primary data, while relevant documents and regulations provided secondary data. This research uses qualitative analysis methods for data analysis, which take place continuously from the beginning of data collection in the field until the research ends.(Zamrud et al., 2021)

## **RESULT AND DISCUSSION**

### **Analysis/Discussion**

#### **Legal Protection of Housing Consumers Due to Developer's Wrongful Actions**

In her book "Economic Law," Sri Redjeki clearly outlines the concept of consumers as individuals or groups who use goods or services for personal or family purposes without the aim of resale.(Sri Redjeki, 2000) This explanation emphasizes that everyone, both individually and in groups, will position themselves as consumers at some point in any situation. The concept covers a broad spectrum of consumption activities, ranging from the use of everyday products to more complex services, highlighting the universal role of consumers in the economy. This definition not only recognizes the existence of consumers in various life scenarios but also emphasizes

the importance of protecting their rights under economic law, given their critical position in the supply chain of products and services.(Sudanto et al., 2022)

In the context of Indonesia's Consumer Protection Law (UUPK), the definition of consumers is expanded to include not only individuals or groups who use goods and services for personal or family purposes, but also the use of such goods for the benefit of other living beings, such as animals and plants. This is a broad view of consumers, according to Ahmad Amiru, who believes that the Consumer Protection Law has taken a very appropriate step in providing the widest possible protection to consumers.(Ahmad Amiru, 2013) This approach recognizes that consumption activities are not limited to human needs but also include the needs of other living beings that depend on humans to fulfill their needs. Thus, the Consumer Protection Law provides an inclusive and comprehensive legal framework that not only focuses on protecting the rights of human consumers in economic transactions but also protects the interests of other living beings who indirectly become consumers in the consumption ecosystem. This demonstrates the legislature's awareness of the relationship between humans, animals, and the environment, as well as the importance of maintaining balance and fairness in all consumption ecosystems. The importance of maintaining balance and fairness in all aspects of life.

Consumer protection is a crucial issue that occupies a central position in the dynamics of national development in various countries, including Indonesia. This issue demands a comprehensive regulation that receives serious attention from all levels of society. In the Indonesian context, current consumer protection efforts aim to emphasize and strengthen the position of consumers as users, users, or beneficiaries of goods and services, which require a shield of legal protection. This initiative reflects the state's commitment to ensuring that consumer rights are not only recognized but also actively protected by law. Through this approach, consumer protection is not only seen as the responsibility of the government but also as a common interest that must be pursued and maintained by all elements of society in order to create a fair and sustainable consumption environment.

The importance of legal protection for consumers is regulated by law to prevent problems in the future because everyone, both alone and together, under any circumstances, must become a consumer of a certain product or service. Article 1 point 1 of Law Number 8 of 1999 concerning Consumer Protection (UUPK) defines consumer protection law as all efforts aimed at ensuring legal certainty and providing protection to consumers. In this case, the consumers are the buyers of land and buildings in Grand Korpri Bentiring Housing.

The issue of consumer protection in various sectors of goods and services, including housing, is still a problem that is difficult to resolve effectively and efficiently based on the applicable laws and regulations. Meeting the housing needs of all levels of society is essential and must be done to the best of our ability.(Yusuf Shofie, 2003)

As is the case in property transactions, if a consumer suffers a loss that results in a loss, then he or she has the right to demand reimbursement of the loss from the housing developer concerned. Therefore, the local government of Bengkulu City is expected, through these laws and regulations, to provide guidance and supervision of all activities related to the implementation of housing and protect the rights of consumers of Grand Korpri Housing from ongoing problems.

The field's occurrences differ from expectations. In this case, consumers of Grand Korpri Bentiring housing have not felt protection either from the government or from the developer due to the developer's illegal actions. According to an interview with Joko, who explained that until now, the consumer community of Grand Korpri Housing in general has not felt either legal protection or real concern from the government or developers, This is evidenced by the absence of an approach to the community from both the government and the developer.<sup>4</sup> Besides that, consumers of Grand Korpri housing have also never felt the Thousand Roads program of the Bengkulu City government, which resulted in the access road in the housing being a path in damaged and unpaved condition. This issue is a very serious problem because it involves the rights of consumers of Grand Korpri Bentiring Housing. Therefore, a solution is needed that can provide real benefits so that consumers of Grand Korpri Bentiring Housing feel comfortable living in their housing regardless of the ongoing conflict.

Related to unlawful acts based on Article 1365 of the *Burgelijk Wetboek*, which states that every unlawful act that brings harm to another person obliges the person whose fault caused the loss to compensate for the loss. With the widespread understanding of the notion of unlawful acts, a theory of relative *tas* or *schutznormtheorie* emerged that teaches that actions that are contrary to legal norms and therefore are against the law will cause the perpetrator to be held liable for losses caused by the act if the norms violated are intended to protect the sufferer, and furthermore that this theory is not only about legal norms regulated in the law but also unwritten laws such as norms of decency, norms of decency, and so on. Legal protection for consumers is an important thing in maintaining the harmony and balance of legal relations between producers and consumers, so it is very necessary to have a concept of legal protection for consumers that can be a direction in providing protection to consumers. So by putting forward various laws and regulations that are a reflection of the principles of consumer protection in Indonesia, it is hoped that they can help the government or developer, in this case, PT. Tiga Putra Mandiri, in an effort to maintain and fulfill the legal protection of the rights of consumers in Grand Korpri Bentiring Housing.

Aristotle also distinguishes between distributive justice and corrective justice. (Simmonds, 2009) Distributive justice, according to him, is justice that applies in public law, which focuses on the distribution, honoraria of wealth, and other goods obtained by members of society. Corrective justice, on the other hand, is concerned with righting wrongs, compensating the wronged party, or punishing the wrongdoer. So it can be mentioned that compensation and sanctions are corrective justice, according to Aristotle. (Hyronimus Rheti, 2015) Similarly, criminal acts committed by developers should not be charged to consumers or result in the elimination of consumer land rights because the land falls to the state due to the proof of unlawful acts (PMH) from the developer. This is in accordance with the adage *nemo punitur pro alieno delikto*, which means that no one is punished for the actions of others. (Eddy O.S. Hiariej, 2015) While civil law liability based on tort (*onrechtmatige daad*) is based on the existence of a legal relationship in this right legal relationship between housing consumers and developers in the sale and purchase agreement, which gives birth to rights and obligations, The conception of tort in Indonesia is based on Article 1365 of the Civil Code: "every act that violates the law and brings harm to others obliges the person who causes the loss due to his fault to replace the loss," so that an act is said to be an unlawful act and can be held liable to pay compensation if the act committed is intentional (done actively) and acts that are negligence (passive or do not intend to do it); besides that, the act is against the law.

Unlawful acts are defined not only as acts that violate written rules, namely acts that are contrary to the legal obligations of the perpetrator and violate the rules of subjective rights of others, but also as acts that violate unwritten rules, namely rules governing morals, decency, accuracy, and prudence that a person should have in the association of life in society or against the property of community members. The development of the Grand Korpri housing construction project in Bentiring village, Muara Bangkahulu sub-district, and Bengkulu City has become a big polemic for some time now, so the Grand Korpri Housing Community in Bentiring, Bengkulu City, has made various efforts to demand and defend their rights as consumers. The community's efforts as consumers of Grand Korpri Bentiring housing are outlined below:

1. Establishing the Bengkulu City Grand Korpri Bentiring Housing Community Forum (FMPGKB)

The community became furious about the unclear housing land in Bengkulu City, specifically Perum Grand Korpri Bentiring. Finally, around 2020, the community formed an association called the Bengkulu City Grand Korpri Bentiring Housing Community Forum (FMPGKB). According to Samsani, it is

hoped that this forum can help the community in terms of accommodating aspirations and demands from those responsible for the conflict.<sup>5</sup>

## 2. Making a Complaint

In June 2020, the community sent an online complaint letter through the website <https://pengaduan.pu.go.id/>. The contents of the community complaint are:

- a. Poor public facilities in the form of a residential entrance shaft road that is currently in badly damaged condition and disturbs the comfort of housing residents. Until now, the road condition is still in the form of hardening the soil, and there has been no improvement from the developer, either in the form of patching or other actions;
- b. Problematic drainage channels at several points, especially in block E, which is unable to accommodate water discharge. This problem has resulted in flooding in residents' homes, especially in the event of heavy rainfall. Until now, the government has not responded to and implemented these complaints, despite the community's strong hope for attention to the conflicts in the Grand Korpri Bentiring housing estate as per the submitted complaints.

## 3. Holding an Open Discussion

Regarding the unclear rights to housing in Bengkulu City, namely Perum Grand Korpri Bentiring Bengkulu City, troubling housing consumers, the Grand Korpri Bentiring Housing Community Forum (FMPGKB) in Bengkulu City, together with the city government, developers, and members of the council, held an open discussion to discuss finding solutions and certainty to the resolution of this problem. This was conveyed by Joko, one of the residents of Grand Korpri Bentiring Housing. He explained that around July 2020, the Grand Korpri Bentiring Housing Community Forum (FMPGKB) held an open discussion with: 1). Waka 1 DPRD Bengkulu City; 2). Head of the Bengkulu City Government Bureau; 3). Representative of Bengkulu City Land Agency; 4). Representative of BTN Bank; 5). Developer of Grand Korpri Housing from PT Tiga Putra Mandiri; 6). Representative from Muara Bangkahulu sub-district; 7). Representative of Bentiring Sub-district Muara Bangkahulu; and 8). Residents of Grand Korpri Housing Approximately 150 residents In the discussion, representatives of community leaders explained that residents felt uneasy due to the news related to problems in their housing, where the community has been paying for KPR houses for approximately 3 years.<sup>6</sup> Therefore, residents of Grand Korpri

---

<sup>5</sup>Interview with Samsani, a resident of the Grand Korpri Housing Complex, Bentiring Village, in Bengkulu, on September 25, 2021

<sup>6</sup>Interview with Joko, a resident of the Grand Korpri Housing Complex, Bentiring Village, in Bengkulu, on September 25 2021

Housing, Bentiring Village, and Muara Bangkahulu Subdistrict requested accelerated legality related to land and housing ownership status. The demands of the Bentiring Grand Korpri Housing community, namely: requesting an accelerated process of handing over land and buildings in the Grand Korpri Bentiring housing estate between the developer and the Bengkulu City government so that their land has legal status; further requesting an accelerated process of issuing building construction permits (IMB) as a condition of transferring the name; requesting an accelerated case settlement. Thus, they will be able to enjoy various development programs from the government so that they can live in a comfortable atmosphere.

### **Legal Actions that the Government Can Take to Resolve Issues that Harm Housing Consumers Due to the Loss of Land Rights of Grand Korpri Housing Consumers**

The violations that occurred to consumers at the Grand Korpri Bentiring Housing complex were related to a land dispute between PT. Tiga Putra Mandiri as a developer and the Bengkulu City regional government, which has harmed consumers. The losses experienced by consumers can be in the form of no legal certainty regarding the status of control of land and buildings due to ongoing land disputes, while consumer obligations for housing credit installments remain to be paid by consumers. Due to the losses felt, people who are consumers of Grand Korpri housing hope that the developer can take responsibility for the losses felt by consumers or be legally responsible.

Looking at the issue of the developer's unlawful actions from a criminal law perspective, it is in the process of being resolved at the District Court stage based on decision 25/Pid.SusTPK/2020/PN.Bgl; High Court Number No. 2/Pidsus/TPK/2021/PTBGL. The Supreme Court even upheld the decision of the District Court and High Court, further strengthening the evidence of unlawful acts committed by the Grand Korpri Housing developer. Through efforts to provide legal protection for consumers who will lose their rights to land, the regional government can provide grants of regional land assets to consumers so that consumers are not harmed. Moreover, the land use remains residential. In Article 68(1), grants of state or regional property are carried out with consideration for social, cultural, religious, humanitarian, non-commercial educational interests, and the administration of state, regional, or village government. Meanwhile, developers based on sales and purchase agreements where consumers have good intentions can ask for compensation for the developer's actions, which not only violate written rules but also violate the principles of propriety, which are contrary to the values that live in society. Acts against the law: both in the perspective of criminal law and in civil law, the meaning of "against the law" has been interpreted broadly (formally and materially), namely covering all acts that are considered reprehensible by society. As in the development of doctrine and jurisprudence in the

field of civil law, the development of criminal law doctrine in Indonesia also accepts the broad meaning of "against the law," namely actions that are contrary to objective law (*in strijd met het objectief recht*), contrary to the subjective rights of other people (*in strijd met het subjectief recht van een ander*), without rights (*zonder eigen recht*), without authority (*onbevoegdheid*), and contrary to unwritten law (*ongeschreven recht*). (Shinta Agustina et al, 2016) This broad meaning of going against the law is manifested in various regulations on criminal acts of corruption, including disgraceful acts, because they conflict with the sense of justice or the norms of social life in society.

Peaceful dispute resolution means resolving disputes between the parties with or without a proxy or companion for each party through peaceful means. Negotiations are conducted through deliberation and consensus between the parties concerned. Dispute resolution in this way is called "family settlement." By using this peaceful method of resolving disputes, we actually want to strive for a form of resolution that is "easy, cheap, and relatively faster". (Shinta Agustina et al, 2016) Article 45 paragraph (2) of the UUPK states that the UUPK requires that peaceful resolution be a legal effort that is prioritized by the parties to the dispute before the parties choose to resolve their dispute through a judicial body or the Consumer Dispute Resolution Agency (BPSK). Dispute resolution through certain institutions or agencies is dispute resolution through general courts or through institutions specifically created by law, namely the Consumer Dispute Resolution Agency (BPSK). Then, according to Susanti Adi Nugroho, in her book entitled Consumer Dispute Resolution Process in View of Procedural Law and Implementation Obstacles, it is explained that if peace efforts have failed to reach an agreement or the parties are no longer able to take an alternative route to peace, then the parties can take the dispute resolution by: (Susanti Adi Nugroho, 2008)

1. Civil legal instruments and procedures resolve a civil lawsuit;  
Settle through civil channels by filing a lawsuit in the district court. This process begins with the registration of a lawsuit, followed by a trial where both parties have the opportunity to present their arguments and evidence. The judgment rendered by the court will seek to recover the losses suffered by the aggrieved party. If the judgment of the district court is not satisfactory to either party, they have the option to appeal or even cassation to get the justice they seek.
2. Criminal resolution of consumer disputes.  
If there is an element of criminal offense in the dispute, resolution can be done through criminal channels by filing a report to the police for investigation. If sufficient evidence is found, the case will be forwarded to court through prosecution by the public prosecutor. In a criminal trial, the judge will decide whether the defendant is guilty and determine the appropriate punishment. Both civil and criminal proceedings offer a mechanism to fight for the rights of

aggrieved consumers and ensure that justice is served in accordance with the law.

## **CONCLUSION**

Legal protection for consumers is important for maintaining harmony and balance in the legal relationship between producers and consumers. The government, which plays the role of regulator, protector, and supervisor, must carry out its role to protect the dignity and worth of consumers so that they are not harmed, as regulated in statutory regulations, which are a reflection of the principles of consumer protection in Indonesia. Currently, protection has not been carried out optimally for the rights of consumers. consumer rights at Grand Korpri Bentiring Housing, Bengkulu City. The developer in this case, PT. Tiga Putra Mandiri, has harmed consumers. The losses experienced by consumers can be in the form of no legal certainty regarding the status of land and building control because the developer has manipulated the assets of the Bengkulu City regional government, meaning that the object agreed upon is contrary to the law because the building being erected is on land that already has Bengkulu City Regional Government asset status. Due to this action, the developer is obliged to compensate Grand Korpri housing consumers for their losses. The developer must be civilly responsible for the losses incurred. There are legal actions that the government can take to resolve problems that are detrimental to housing consumers. The Bengkulu City Regional Government can grant land assets. Legal protection efforts for consumers who will lose land rights. The regional government can make grants of regional land assets to consumers so that consumers are not harmed. Moreover, the land use remains residential. Grants of state or regional property are carried out with consideration for social, cultural, religious, humanitarian, non-commercial educational purposes, and the administration of state, regional, or village governments. This is very much in line with justice because housing consumers are victims of the developer's unlawful actions.

## **Suggestion**

The lack of optimal legal protection for housing consumers in Bengkulu City should be evaluated so that similar cases are not repeated in the future. The first step that needs to be taken is to better manage regional assets, including closely monitoring the use of these assets. Developers handling housing development licenses should coordinate well on land rights, from the initial stage to the issuance of land certificates. This coordination is important to ensure that there are no legal loopholes that can be exploited to conduct activities that harm consumers. As a solution, local governments can improve transparency in asset management and the housing development licensing process. This can be done by providing easy and open access to information for the public regarding ongoing housing projects, including the

legal status of land and the licensing procedures involved. In addition, the strengthening of independent oversight institutions that function to monitor and evaluate the housing development process also needs to be considered, so as to prevent irregularities that harm consumers. Thus, the role of public services can be run efficiently and effectively, ensuring consumer rights are protected and increasing public confidence in housing development projects.

## REFERENCES

- Ahmad Amiru. (2013). *Prinsip-Prinsip Perlindungan Konsumen bagi Konsumen Di Indonesia*. RajaGrafindo Persada.
- Ashar Sinilele. (2017). Tinjauan Yuridis terhadap Pelaksanaan Pengadaan Tanah bagi Pembangunan untuk Kepentingan Umum di Kota Makassar. *Jurnal Al-Qadau: Peradilan dan Hukum Keluarga Islam*, 4(1), 1–24. <https://doi.org/10.24252/AL-QADAU.V4I1.4972>
- Bhat, P. I. (2020). Empirical Legal Research: Nature, Features, and Expanding Horizons. In P. I. Bhat (Ed.), *Idea and Methods of Legal Research* (hal. 303–325). Oxford University Press. <https://doi.org/10.1093/oso/9780199493098.003.0010>
- Eddy O.S. Hiariej. (2015). *Prinsip-prinsip Hukum Pidana*. Cahaya Atma Pustaka.
- Gustaaf Kusno. (2017). Menggugat “Inkraht” di Pengadilan Tata Bahasa - *Kompasiana.com*. <https://www.kompasiana.com/gustaafkusno/555c1f5df092732b13f9f86b/menggugat-at-incraht-di-pengadilan-tata-bahasain-kracht-van-gewijsde-keputusan-final>
- Hersperger, A. M., Ioja, C., Steiner, F., & Tudor, C. A. (2015). Comprehensive Consideration of Conflicts in the Land-Use Planning Process: A Conceptual Contribution. *Carpathian Journal of Earth and Environmental Sciences*, 10(4), 5–13.
- Hyronimus Rhiti. (2015). *Filsafat Hukum Edisi Lengkap (Dari Klasik ke Postmodernisme)*, Cet. Kelima. Universitas Atma Jaya.
- Kaharuddin, K. (2023). Legal Sociology Approach: A Critical Study on Understanding the Law. *Veteran Law Review*, 6(Special Issues), 54–69. <https://doi.org/10.35586/VELREV.V6ISPECIALISSUES.4955>
- Peraturan Pemerintah Republik Indonesia Nomor 28 Tahun 2020 Tentang Perubahan Atas Peraturan Pemerintah Nomor 27 Tahun 2014 Tentang Pengelolaan Barang Milik Negara/Daerah
- Peraturan Pemerintah Republik Indonesia Nomor 28 Tahun 2020 Tentang Perubahan Atas Undang-Undang Nomor 1 Tahun 2011 Tentang Perumahan Dan Kawasan Permukiman.LN TAHUN 2011 NOMOR 7.
- Peraturan Pemerintah. Nomor 12 TAHUN 2021 Tentang Perubahan Atas Peraturan Pemerintah Nomor 14 Tahun 2016 Tentang Penyelenggaraan Perumahan Dan Kawasan Permukiman
- RED. (2018). *Pelaksanaan Suatu Perjanjian*. *Hukumonline.com*. <https://www.hukumonline.com/berita/a/pelaksanaan-suatu-perjanjian-1t5a5c2fbdae8c4>
- Shinta Agustina et al. (2016). *Penjelasan Hukum: Sifat Melawan Hukum Dalam Kasus Korupsi*. LelP Puri Imperium Office Plaza.

- Simmonds, N. E. (2009). *Corrective and Distributive Justice: From Aristotle to Modern Times*. By Izhak Englard. [Oxford: Oxford University Press. 2009. xiii, 224 and (Table of Cases and Index) 12 pp. Hardback £52.00. ISBN 9780195380071.]. *The Cambridge Law Journal*, 68(3), 655–657. <https://doi.org/10.1017/S0008197309990195>
- Sri Redjeki. (2000). *Hukum Ekonomi*. Mandar Maju.
- Sudanto, Saiin, A., & Zaitun. (2022). Legal Protection of Consumer Rights in The Concept of Human Rights. *Bilancia: Jurnal Studi Ilmu Syariah dan Hukum*, 16(1), 1–20. <https://doi.org/10.24239/BLC.V16I1.769>
- Susanti Adi Nugroho. (2008). *Proses Penyelesaian Sengketa Konsumen Ditinjau dari Hukum Acara Serta Kendala Implementasinya*. Kencana.
- Yusuf Shofie. (2003). *Perlindungan Konsumen dan Instrumen-instrumen Hukumnya*. PT. Citra Aditya Bakti.
- Zainudin, M. (2020). Kajian Pasal 1338 Kitab Undang-Undang Hukum Perdata tentang Akibat Suatu Perjanjian dalam Sewa Menyewa Lahan Garam (Studi Kasus Desa Karanganyar). *Jurnal Jendela Hukum*, 7(1), 41–47. <https://doi.org/10.24929/FH.V7I1.1567>
- Zamrud, W. O., Muskur, L. O. M., & Fitriani, F. (2021). Fungsi Kantor Pertanahan Sebagai Pelaksana Percepatan Pendaftaran Tanah Sistematis Lengkap (PTSL). *Jurnal Ilmu Hukum Kanturuna Wolio*, 107–119. <https://doi.org/10.55340/JKW.V2I2.750>