
The Legal Position Of The Will Given To The Adopted Child As Proof Of Ownership In The Gorontalo Religious Court

Meriyani Hinele

¹ Faculty of Law, Universitas Negeri Gorontalo, Indonesia. E-mail: meriyanihinele6@gmail.com

ARTICLE INFO

Keywords :
Position; Will; Dispute

How To Cite :
Meriyani H. (2019). The Legal Position Of The Will Given To The Adopted Child As Proof Of Ownership In The Gorontalo Religious Court *Estudiante Law Journal*. Vol. 1 (3): 625-

DOI :

ABSTRACT

The purpose of this study is to find out and analyze the Juridical Analysis of Religious Court Decision Number: 403/PDT. G/2019/PA. Gtlo Concerning the Determination of Probate Disputes and the Legal Position of the Will as proof of rights in the judgment of the Judge. Research Uses this type of normative-empirical research. Using several approaches, namely: the legal approach (*statue approach*), the case approach (*case approach*). The results of this study show that: *First*, that based on juridical analysis of religious court decision number: 403/PDT. G/2019/PA. Gtlo About the Determination of Will Disputes has been in line with the provisions of the event law, where the first condition that must be met by the plaintiff is regarding material conditions, while the plaintiff in his lawsuit is wrong in occupying defendant 1 and defendant 2 (two). *Second*, that the legal position of the Will as proof of rights in the judge's consideration is not used as a balance material by pa judges because there are defects as intended by the researcher, therefore the judge ruled the lawsuit is unacceptable (*Niet Onvoantkelijke Verklaard*) which means that the case has not been completed with a positive verdict in the sense that it has not touched the subject matter and if the plaintiff wants to re-apply must complete the terms of the formil in question

@2019 Meriyani H.

Under the license CC BY-SA 4.0

1. INTRODUCTION

Nur Mohamad Kasim argues that: Every legal product that has shortcomings and weaknesses, cannot be expected to realize the ideal legal objectives. The purpose of the law to be realized, oriented to the values of justice, expediency and legal certainty in all the joints of life in society. The purpose of the law can only be realized through the implementation, application and enforcement *of law (law enforcement)*. The purpose of the law is oriented towards equal rights, obligations and standing before the law (*equality before the law*), and is not discriminatory.¹

Regarding the role of this law, Salim HS stated, that: "In this reform era there have been many laws and regulations that are in accordance with the wishes of the Indonesian people. This can be seen in Law No. 22 of 1999 on local government, Law No. 25 of 1999 on Financial considerations between central and regional governments, Law no. 28 of 1999 on the maintenance of a clean and bebbas state from corruption, collusion and nepotism, law number 30 of 1999 on arbitration and settlement of disputes outside the court, Law No. 41 Taghun 1999 on Forestry and others."²

One of the purposes of the law governing human relations established by God include the rules about inheritance and wills, namely property and ownership that arise as a result of a death. A treasure left behind by someone who has died requires an arrangement of who is entitled to receive it, how much and how to obtain it. The rules of inheritance and will are established by Allah through His word contained in the Qur'an. Basically, God's provision regarding the beanancy and will is clear its purpose and direction.

In civil law, wills are important, because disputes between heirs over inheritance can be avoided by the last message. With a will, the heir can determine who will be the heir. With a will can also inheritance is intended to a certain person, either in the form of certain objects or a number of objects that can be replaced. A testament containing some or all of the wealth, is merely a promise from the testament maker to the recipient of the testament. The promise could only be fulfilled after the testament maker died.³

Various things that still require explanation, both affirming and detailing, conveyed by the Prophet through his hadith. Nevertheless, its application still gives rise to discourse of thought and discussion among Islamic jurists who are then formulated in the form of

¹ Nur Mohamad Kasim, Jurnal: *Studi Komparatif Waris Menurut Hukum Islam dan Hukum Adat*, Universitas Negeri Gorontalo, hlm. 1.

² Salim HS, 2011, *Pengantar Hukum Perdata Tertulis (BW)*, Penerbit: Sinar Grafika, jakarta, hlm. 3.

³ Anisitus Amanat, 2001, *Membagi Warisan Berdasarkan Pasal-Pasal Hukum Perdata BW*, Penerbit: PT RajaGrafindo Persada Jakarta, hlm. 81-82.

normative teachings. The rule is then written and enshrined in the pages of the book of jurisprudence and becomes a guideline for Muslims in solving problems related to inheritance and wills.

In connection with the preparation of this scientific work, prospective researchers limit the question of will. A will is one way of transitioning property from one person to another. This system of wills has been running since ancient times, not only the religion of Islam that regulates, but every community has an understanding of the will. These probate systems have differences in their implementation.

All of them have their own provisions on how legitimate the implementation of the will. Similarly, in Indonesia, the same has its own rules about this will. Among them is regulated in the Civil Law Code for non-Muslims who are not subject to customary law, while for Muslims it is regulated in the Compilation of Islamic Law (KHI).

As we know together, the legal basis of the will is contained in *kuhpdt* precisely in Article 874 whose contents and core, regulating all the relics of someone who died, belongs to the heirs. So that formalities can be understood if the will must be written in front of a notary and deposited or stored by a notary.

As for the deed under the hand that is entirely handwritten and dated and signed by the heir can be categorized as a will. But such a will is only given for the appointment of the executors of burials, clothing, certain body jewels, and special household utensils. In other words, a will made with a deed under the hand, not for goods or property other than those regulated by the Act, especially article 935 *kuhpdt*.

A will should only be declared, either by a self-written deed (*olographic testament*), either by a general deed (*openbaar testament*), or a secret or closed deed (*geheimtestament*).⁴ So the will according to its form there are three, namely: a self-written will (*olographic testament*), a general will (*openbaar testament*) and a secret will or closed will (*geheimtestament*). Regarding the self-written will (*olographic testament*) the law explains that a written will itself must be entirely written and signed by the one who bequeaths himself. Such a will by the bequeather must be delivered to a notaries.⁵

Notary is in charge and obliged to make a list of deeds relating to the will in the order of time of making the deed each month; send a list of deeds or nil lists relating to wills to the Will List Center at the ministry that organizes government affairs in the field of law within 5 (five) days of the first week of each following month.⁶

⁴ Pasal 931 Kitab Undang-Undang Hukum Perdata.

⁵ Pasal 932 Kitab Undang-Undang Hukum Perdata.

⁶ Pasal 16 huruf (i) dan (j) Undang-Undang Nomor 2 Tahun 2014 tentang Perubahan Atas Undang-Undang

If the notary neglects to carry out his responsibilities related to the will, it can harm the recipients of the will and consequently the notary can be prosecuted in court by the will recipients. The notary may be sanctioned in the form of: written warning; temporary stop; respectful dismissal; or dismissal with disrespect.⁷

Based on the facts that exist in society and in everyday life, there are often disputes and problems that arise including will disputes conducted before a Notary. Due to *Ruth Hefelbower* is a condition that occurs when two or more parties consider there are differences in positions that are not aligned, not enough sources and actions of one party obstruct, or interfere or in some ways make the other party's goals less successful.⁸ The resolution of will disputes conducted before notaries even leads to judicial proceedings.

2. PROBLEM FORMULATION

Based on the background description of the above problem, it can be formulated the problem in this study, namely How to Analyze Juridical Religious Court Decision Number: 403 / PDT. G/2019/PA. Gtlo About The Determination of Will Disputes? And what is the legal position of the Will as proof of rights in the judgment of the Judge?

3. RESEARCH METHODS

Research Uses this type of normative-empirical research. Using several approaches, namely: the legal approach (*statue approach*), the case approach (*case approach*). while in this study using deductive-inductive analysis techniques that are the withdrawal of conclusions that are general to statements that are specific.

4. ANALYSIS AND DISCUSSION

A. Analysis of Religious Court Decision Number: 403/PDT. G/2019/PA. Gtlo On The Determination of Will Disputes

Judges of the Religious Court have the main duty to accept, examine and resolve cases by conducting a case. The settlement of the case was reached by a verdict from the judge. In making a decision, the judge must be sourced from the results of the examination in the trial recorded in full in the News of the Trial Event (BAP). The verdict shall contain legal considerations that illustrate the subject of the judge's mind in qualifying the proven facts in the trial and finding the law for the event. Here the

Nomor 30 Tahun 2004 Tentang Jabatan Notaris.

⁷ Pasal 16 ayat (11) Undang-Undang Nomor 2 Tahun 2014 tentang Perubahan Atas Undang-Undang Nomor 30 Tahun 2004 Tentang Jabatan Notaris.

⁸ Anita Kamilah dan M. Rendy Aridhayandi, "Kajian terhadap Penyelesaian Sengketa Pembagian Harta Warisan Atas Tanah Akibat tidak Dilaksanakannya Wasiat oleh Ahli Waris Dihubungkan dengan Buku II Kitab Undang-Undang Hukum Perdata tentang Benda (*Van Zaken*)" : Jurnal Wawasan Hukum, Vol. 32, No. 1, Februari 2015, hlm. 26.

judge must formulate in detail, chronologically, and relationship with each other based on the law or regulation that the judge expressly mentions.

Before discussing further about the judge's consideration in deciding the case of decision Number: 403 / PDT. G/2019/PA. Gtlo, then first explained about the consideration of the judge in the ruling it is listed in legal considerations. Legal considerations are one part of the content of the verdict that must be in a verdict. This is in accordance with Articles 178, 182, 183, 184 and 185 HIR and Articles 194, 195 and 198 RBg, where a judge's decision consists of 6 (six) parts, namely:

- a. Head of verdict;
- b. The identity of the parties;
- c. Sitting things;
- d. Regarding legal considerations;
- e. Amar Verdict (*Dictum*);
- f. Closing section

Based on the description, the judge's consideration is a part that is important in a verdict. The consideration of the judge in the ruling is in legal considerations or about the law that contains the reason and basis of the ruling and also contains certain articles of the relevant laws and regulations or unwritten legal sources that serve as the basis for adjudication. This is in accordance with Article 25 paragraph 1) of Law No. 4 of 2004 concerning the Power of Justice. In this legal consideration the judge will consider the proposition of the lawsuit regarding matters that are recognized and disputed by the parties.

Legal considerations contain matters that are the subject matter, juridical analysis of all the facts that occur in the trial regarding the evidence and application of legal provisions to events that have been put forward by the parties or in other words, legal considerations that can be applied in the case. The reasons for the consideration of the law must be loaded or arranged logically (objectively), systematically and interconnectedly. All parts of the claim or petitum shall be considered one by one so that the judge can draw conclusions about whether or not the claim is proven. This is where the judge's main task is to coordinate all events that occur in the trial. It must also be contained the basis and reason of the ruling, the Articles and the law are not written in the subject matter and oblige the judge because his position completes all legal reasons not stated by the parties. Judges are prohibited from handing down verdicts on cases that are not prosecuted or pass more than what is required. This is stipulated in Article 178 paragraph (1) and Article 184 HIR, Article 189 paragraph (1) of the RBg and Article 25 of Law No. 4 of 2004 concerning the Power of Justice.

In Perkata *a quo* as the researchers explained above, related to the case of the will dispute, then the researcher saw there are several things that are a record of the decision Number: 403 / PDT. G/2019/PA. The gtlo, among others:

1. Related to the judge's consideration of the formil requirement that is not fulfilled, according to the researcher is appropriate because the formil requirement is a fundamental condition in occupying the case as a legal provision of the event, where the consideration is the party who is used as a defendant does not meet the provisions that should be used as the subject of the lawsuit. Legal subject conditions referred to by legal subjects are the parties who deserve to be placed as plaintiffs and defendants in the lawsuit, namely there is a shortage that sells land to defendant I who has died, then that must be withdrawn as a party is his son, Amir Niode and Rusdi Niode, this is intended so that the lawsuit can be understood the position of their respective legal subjects.
2. Regarding the will that is used as evidence by the plaintiff is not at all considered by the judge in deciding the case *a quo*, which related to the will should be considered by the judge, but researchers can understand that the judge's consideration is then reasoned because the formil requirement is not fulfilled by the plaintiff. But the judge should be bolder in the case *a quo* to find the material truth which is rarely important in finding substantive justice in a case heard in court, especially *a* religious court that will decide a will.

Based on the considerations as stated above, the researcher concluded that in the case of the probate dispute the judge in deciding the case has been in accordance with the legality of the event in the religious judiciary where the first requirement that is made a benchmark is the fulfillment of the requirements for the case which in this case is case Number: 403 / PDT. G/2019/PA. Gtlo about the will dispute by the defendant, this formil requirement is important to occupy a case in the civil court, especially religious prosecution. However, the condition of formil does not become a guarantee of justice because if the formil requirement is not fulfilled then material considerations in deciding the case will not be made as an unacceptable alias consideration (*Niet Onvankelijke Verklaard*) which means that this case has not been completed with a positive verdict in the sense that it has not touched the subject matter and if the plaintiff will to reapply must complete the requirements formil.

B. The Legal Position of Will as Proof of Property Rights in Religious Courts

The habit that has long been practiced by man on his wealth is to be established at the time of his death, namely through the Will. This means that in the habit of society something like the implementation of a will has become commonplace, this is referred

to as the last mandate that is the implementation after the maker of the Will dies. The essence of the contents of the Will is to describe all the treasures, the ordinances of division, and determine who receives and the form of division.⁹

People who have property sometimes want his property later if he dies can be used according to the needs of the heirs. Therefore, the law allows the owner of the property to give his property according to his own wishes which deviates from the provisions of inheritance law, this is natural because in principle a property owner is free to treat his property as he wishes. However, in reality there is not a little conflict in terms of the division of property left behind or also called relics by the owner of the object.¹⁰

Habits that are repeatedly practiced in society then form a generally accepted ordinance and norm which then forms an order that then becomes a form of written law. This also happens with this Will, because the effect of the will is very much in contact with the sense of justice, which then results in the law. So in other words, the Will is a legal act because it results in the law. Seeing from the legal consequences attached to the Will, arrangements against it are made to maintain order in public life.¹¹

Developments in state life in the concept of the modern state lead to arrangements to avoid chaos in public life, including normative restrictions on various human actions.¹² Frans Magnis Soseno argues that normative restrictions presupply reason because it requires understanding,¹³ He also added that the arrangement through the institution of normative structuring of society is law.¹⁴

In the Kuh Civil recognizes the rules of this will grant by the name of *testament* set out in Book II Chapter XIII. About the general provisions of a will, a person's ability to

⁹ Al-Alaby, M. M. (2021). Analisis Terhadap Fatwa Dewan Syari'ah Nasional Majelis Ulama Indonesia No. 29 Tahun 2002 Tentang Wakaf Uang (Telaah Wakaf Saham).

¹⁰ Fanny Levia & Erni Agustin, Hasil Penelitian atas Tanggung Gugat Notaris dalam Pelaksanaan Pendaftaran Wasiat secara Online, dalam jurnal hokum ARENA HUKUM Volume 10, Nomor 1, April 2017, Halaman 141

¹¹ Hayati, N. (2014). Kajian Hukum Pertanggungjawaban Pidana terhadap Notaris dalam Menjalankan Jabatan Terkait Ketiadaan Sanksi Pidana pada Undang-Undang Nomor 30 Tahun 2004 Tentang Jabatan Notaris. *Lex Jurnalica*, 11(1), 18052.

¹² Ahmad, A., & Nggilu, N. M. (2020). Denyut Nadi Amandemen Kelima UUD 1945 melalui Pelibatan Mahkamah Konstitusi sebagai Prinsip the Guardian of the Constitution. *Jurnal Konstitusi*, 16(4), 785-808.

¹³ Lay, J. (2019). Kedudukan Surat Wasiat (Testament) Sebagai Bukti Kepemilikan Yang Sah Menurut Pasal 875 Kuhperdata. *Lex Privatum*, 7(3).

¹⁴ *Ibid*

make a will or to enjoy the benefit of a will, the form of a will, inheritance inheritance, will grant, revocation and fall of the will.

The understanding of the Will is regulated in Article 875 of the Civil Code which states that:

"A testament is a deed that contains a person's statement of what he wishes will happen after he dies and can be revoked."

From the above understanding, it can be drawn the core that must be fulfilled from a Will in accordance with the mandate of the Law, namely:

1. The Will is in the form of an Act which means written;
2. Contains a statement from a person while still alive;
3. His wish after he died;
4. His statement can be retracted.

The fulfillment of point (1) to point (3) then the Will is legally valid so that it has the power of law, and if it has the power of law it is valid evidence in the eyes of the law. While point (4) is an inherent right to the will maker in the event that he is still alive, then he can revoke the will.

The element of a will is "in the form of a deed", where the will must designate a writing, a written one.¹⁵ Given that a will has far-reaching consequences and only applies after the will-maker dies, then a will is bound to strict conditions. Doesn't a new will become a problem after the person who made it die and therefore can no longer be asked about what he really wants.¹⁶ The second element of the will is "containing the last statement of will which means unilateral legal action". Unilateral legal action is the action or statement of one person alone is sufficient for the onset of the desired legal consequences. The third element is "What happens after he dies", meaning that the new will applies and has legal consequences when the maker dies.¹⁷

In case Number: 403/PDT. G/2019/PA. Gtlo about the probate dispute in the ruling on the case, the PA judge did not consider at all about the evidence submitted by the plaintiff, while the researcher understood that in the case of the will dispute, the

¹⁵ Thalib, M. C. (2020). Refleksi Perlindungan Hak Anak Butuh Kasih di Kota Gorontalo. *Jurnal Obsesi: Jurnal Pendidikan Anak Usia Dini*, 5(1), 566.

¹⁶ Junus, N., & Mamu, K. Z. (2019). Kebijakan penataan dan pengaturan kawasan danau (arrangement and regulation of lake area policy). *Jurnal Yuridis Vol*, 6(2), 136-156.

¹⁷ Lay, J. (2019). Kedudukan Surat Wasiat (Testament) Sebagai Bukti Kepemilikan Yang Sah Menurut Pasal 875 Kuhperdata. *Lex Privatum*, 7(3).

evidence of the will is one of the premier or main evidence tools in the event of a dispute.

Therefore, according to the researchers, the PA judge should consider the existence of a will granted by the deceased to his adopted son as proof of legitimate ownership where it has also been made the basis by the BPN of Gorontalo City which does not issue a land certificate requested behind the name of the certificate from Ratna Puloo to Defendant I on the grounds that there must be approval from the Plaintiff who is the recipient of the will of the deceased Marie Puloo. as the initial owner of the object of the dispute. The BPN rejected the request for a name submitted by Defendant I, because it had been revealed the existence of a will from the deceased Marie Puloo.

The reason as described by the researcher above is based on the consideration that a will (*testamen*) must be a written form made with a deed under the hand or with an authentic deed. This act contains a statement of will as a unilateral legal action, which means that the statement comes from one party only. In other words, *testament* is a statement about something after he died. So, a new *testament* has consequences after the heir dies.

For researchers physically, the Will must be a qualified deed. Meanwhile, when viewed from its contents or materially, the will (*testamen*) is a statement of will, which only has an effect or applies after the testamen dies. Statements on the letter can be retracted unilaterally as long as the testator is still alive. In the exception of the plaintiff into an authentic deed as a means of evidence in the trial, but the case of this inheritance dispute has not entered the stage of proof because the Court considers there is a formal case in the trial that is not filled by the defendant's lawsuit therefore the trial cannot continue in the proof stage.

Meanwhile, if referring to the provisions as stipulated in the law that the authentic Deed is made the purpose is to prove in the future in the event of a dispute. Legally, there are two functions of authentic deeds, namely to declare the existence of a legal act and for proof. The power of Proof of Authentic Deed is regulated in Article 165 HIR, Article 1870 and Article 1871 of the Civil Code, it can be argued that the power of proof of notary deed as a perfect proof tool, then the authentic deed has all the power of proof whether born, formal, or material.

Article 1870 of the Civil Code:

For the interested parties and their heirs or for those who get their rights, an authentic deed provides a perfect proof of what is contained in it.

Article 1871 of the Civil Code:

However, an authentic deed does not provide perfect evidence of what is contained in it as mere narration, unless it has a direct relationship with the subject matter. If what is contained in the deed is only a mere speech that has no relation to the subject of the deed, then it can only be used as a beginning of proof with writing.

Thus, the researchers saw the legal position of the will as evidence of property rights in the Gorontalo Religious Court in the trial was not made the basis in the judge's consideration because the judge of the Gorontalo Religious Court judged that there was a flaw in the lawsuit filed by the plaintiff, this was reflected in the verdict read by the judges of the Religious Court who in no way made the will as authentic evidence upfront. the trial, only considering the non-fulfillment of the formil conditions by the plaintiff so that the judge ruled the lawsuit was unacceptable (*Niet Onvankelijke Verklaard*) which means that the case has not been completed with a positive verdict in the sense that it has not touched the subject matter and if the plaintiff wants to reapply must complete the conditions formil.

5. CONCLUSION

Referring to the discussion, as described by the researcher in the sheets in the previous chapter (chapter 4), the researcher can give the following conclusion: *First*, that based on juridical analysis of religious court decision Number: 403 / PDT. G/2019/PA. Gtlo About the Determination of Will Disputes has been in line with the provisions of the event law, where the first condition that must be met by the plaintiff is regarding material conditions, while the plaintiff in his lawsuit is wrong inuduudu defendant 1 and defendant 2. *Second*, that the legal position of the Will as proof of rights in the judge's consideration is not used as a balance material by pa judges because there are defects as intended by the researcher, therefore the judge ruled the lawsuit is unacceptable (*Niet Onvankelijke Verklaard*)) which means that the case has not been completed with a positive verdict in the sense that it has not touched the subject matter and if the plaintiff wants to re-file must complete the terms of the formil in question.

6. RECOMMENDATIONS

Here are some suggestions or recommendations that researchers want to convey as a form of findings from several problems raised by researchers. Research Recommendations are as follows: *First*, before entering into the preliminary hearing, there should be a mechanism of dismissive procedure, where this procedure will be the basis of whether a case listed is qualified formil or not so that there are no cases that are not decided before the validity of all series of trials up to the verdict, in addition it will also eliminate the buildup of religious cases. *Second*, the Judge in formulating the verdict of course there is a principle of freedom of judges therefore, the judge should be more courageous in digging for the truth in order to achieve substantive justice in a verdict.

REFERENCE

Book:

- Anisitus Amanat, 2001, Membagi Warisan Berdasarkan Pasal-Pasal Hukum Perdata BW, Penerbit: PT RajaGrafindo Persada Jakarta.
- Al-Alaby, M. M. (2021). Analisis Terhadap Fatwa Dewan Syari'ah Nasional Majelis Ulama Indonesia No. 29 Tahun 2002 Tentang Wakaf Uang (Telaah Wakaf Saham).
- Nur Mohamad Kasim, Jurnal: *Studi Komparatif Waris Menurut Hukum Islam dan Hukum Adat*, Universitas Negeri Gorontalo.
- Salim HS, 2011, *Pengantar Hukum Perdata Tertulis (BW)*, Penerbit: Sinar Grafika, Jakarta.

Journal:

- Ahmad, A., & Nggilu, N. M. (2020). Denyut Nadi Amandemen Kelima UUD 1945 melalui Pelibatan Mahkamah Konstitusi sebagai Prinsip the Guardian of the Constitution. *Jurnal Konstitusi*, 16(4).
- Al-Alaby, M. M. (2021). Analisis Terhadap Fatwa Dewan Syari'ah Nasional Majelis Ulama Indonesia No. 29 Tahun 2002 Tentang Wakaf Uang (Telaah Wakaf Saham).
- Anita Kamilah dan M. Rendy Aridhayandi, "Kajian terhadap Penyelesaian Sengketa Pembagian Harta Warisan Atas Tanah Akibat tidak Dilaksanakannya Wasiat oleh Ahli Waris Dihubungkan dengan Buku II Kitab Undang-Undang Hukum Perdata tentang Benda (*Van Zaken*)" : Jurnal Wawasan Hukum, Vol. 32, No. 1, Februari 2015
- Fanny Levia & Erni Agustin, Hasil Penelitian atas Tanggung Gugat Notaris dalam Pelaksanaan Pendaftaran Wasiat secara Online, dalam jurnal hokum *ARENA HUKUM Volume 10, Nomor 1, April 2017*.
- Hayati, N. (2014). Kajian Hukum Pertanggungjawaban Pidana terhadap Notaris dalam Menjalankan Jabatan Terkait Ketiadaan Sanksi Pidana pada Undang-Undang Nomor 30 Tahun 2004 Tentang Jabatan Notaris. *Lex Journalica*, 11(1).
- Junus, N., & Mamu, K. Z. (2019). Kebijakan penataan dan pengaturan kawasan danau (arrangement and regulation of lake area policy). *Jurnal Yuridis Vol*, 6(2).
- Lay, J. (2019). Kedudukan Surat Wasiat (Testament) Sebagai Bukti Kepemilikan Yang Sah Menurut Pasal 875 Kuhperdata. *Lex Privatum*, 7(3).

- Thalib, M. C. (2020). Refleksi Perlindungan Hak Anak Butuh Kasih di Kota Gorontalo. *Jurnal Obsesi: Jurnal Pendidikan Anak Usia Dini*, 5(1).
- Wantu, Fence M., and Dian Ekawaty Ismail. "Constitutional Dialogue In Judicial Review At The Indonesian Constitutional Court: The Future Prospects." *Journal of Legal, Ethical and Regulatory Issues* 25 (2022): 1-8.
- Wantu, Fence M., Novendri M. Nggilu, and Mellisa Towadi. "Indonesian Constitutional Interpretation: Constitutional Court Versus The People's Consultative Assembly." *Journal of Legal, Ethical and Regulatory Issues* 24.6 (2021): 1-11.
- Wijaya, Ahmad, and Nasran Nasran. "Comparison Of Judicial Review: A Critical Approach To The Model In Several Countries." *Jurnal Legalitas* 14.2 (2021): 85-106.
- Wijaya, Ahmad, and Nasran Nasran. "Comparison Of Judicial Review: A Critical Approach To The Model In Several Countries." *Jurnal Legalitas* 14.2 (2021): 85-106.