

Forgery of TNI Headquarters Land Documents by Dani Bahdani (A Case Study of Land Dispute Resolution by Unit 3, Sub-Directorate 2, Directorate of General Crimes, Bareskrim Polri)

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ABSTRACT

Land holds a crucial position in Indonesia both as a communal resource and a high-value economic asset, making disputes over land rights particularly those triggered by document forgery highly prevalent and socially impactful. Given this context, cases involving falsified land certificates often escalate into complex legal disputes requiring meticulous investigation. This research aims to analyze the chronology of Dani Bahdani's lawsuit against TNI Headquarters, the investigation process conducted by Unit 3, Sub-Directorate 2 Directorate of General Crimes, Bareskrim Polri, and the obstacles faced in handling the land document forgery case. Using qualitative methods with a case study approach through interviews, documentation, and source triangulation, the research found that Dani Bahdani used fake girik or Land Ownership Certificate and invalid power of attorney to sue state assets, while investigators successfully uncovered the forgery through investigation management and Scientific Crime Investigation (SCI) including forensic document examination. The research results show that the investigation ran effectively thanks to inter-agency coordination and facility support, but still faced obstacles in the form of weaknesses in the substance of Article 263 of the Criminal Code, lack of synchronization in land regulations, minimal integration of BPN data, and low public legal awareness. In conclusion, this case confirms the importance of strengthening document forgery regulations, integrating the national land system, and increasing legal education to the public to prevent similar cases from recurring.

Keywords: Bareskrim Polri, Land Document Forgery, Land Disputes, Scientific Crime Investigation

1. Introduction

In its function as a communal resource (a resource owned collectively by a group, not individually), land forms bonds that connect humans in daily interactions; meanwhile, in its function as a financial resource, land is recognized as a vital component in societal progress. Consequently, for the population of Indonesia, the existence of and the right to own land are extremely important, directly affecting their welfare; an increase in land ownership correlates directly with an improvement in living standards. This is because, in Indonesia, land can be owned by individuals, organizations, or communities, which allows these landowners to utilize their land according to its designated purpose (Rafie et al., 2024). Essentially, a person who holds a property right obtains benefits such as the right to use, the right to manage, the right to collect taxes, the right to capital, and the right to transfer (Sari et al., 2022). It is therefore not surprising that the importance of land for humans as individuals and for the state as the highest societal organization is regulated in Indonesian legislation, such as Article 33 paragraph (3) of the 1945 Constitution, which states: *"The earth, water, and natural resources contained therein are controlled by the state and shall be utilized to the greatest extent for the prosperity of the people,"*

and Law Number 5 of 1960 concerning Basic Agrarian Regulations as a follow-up to Article 33 paragraph (3) of the 1945 Constitution related to the earth or land.

Given the importance of land and the substantial financial value associated with its legal ownership, as humanity develops, the need for land increases, which triggers disputes and tensions among people. Various conflicts and disputes related to land often arise, such as disputes over land rights, illegal land seizure, illegal land occupation, assertion of ownership claims over another person's property, damage caused to agricultural products, destruction of another person's fence, and various other activities related to land issues (Cahyaningrum, 2021). Among these various types, disputes related to land rights are one of the most prevalent types of land dispute cases in Indonesia. The forgery of land certificates is one of the causes of disputes related to land rights.

Cases of document forgery, particularly land certificates, are the most frequent occurrences. In Indonesia, in 2007, it was revealed that there were approximately 7,491 land dispute cases, and 85 percent of the total cases were related to document forgery and false information (detikNews, 2008). At the same time, cases of document forgery in general are indeed common. Even the Indonesian National Police (Polri) estimated that there are about seven cases of document forgery that must be handled every day (Pusiknas, 2022). This indicates how frequently the phenomenon of document forgery occurs, and one of them is the forgery of land certificates itself.

The land dispute case between the Indonesian National Armed Forces Headquarters (Mabes TNI) and Dani Bahdani stems from the ownership of 485,030 m² of land in the Jatikarya area, Bekasi, which was initially acquired by the Department of Defense and Security (Dephankam) in 1971. This acquisition process was carried out through coordination with the Bekasi Regency Government and the local National Land Agency (BPN), accompanied by letters of statement of release of rights from approximately one hundred landowners who received compensation according to the agreement. All the *girik* (Land Ownership Certificate) documents and letters of release of rights were then submitted to Dephankam, so the land was administratively and factually under state/TNI control.

The problem reemerged in 2023 when Mabes TNI was sued by a group of residents, led by Candu bin Godo and 78 others. This lawsuit was known to be initiated by Dani Bahdani, who obtained blank *girik* forms from residents and filled them out without any verification process or witness testimony regarding the time and place of filling. The filled *girik* documents were then used as evidence of ownership in the lawsuit against the TNI, thereby triggering a demand for compensation of IDR 228 billion.

Through witness testimony and document tracing, Mabes TNI found that the *girik* used in the lawsuit were not authentic and had no legal validity. Based on this finding, Mabes TNI reported the case to the Indonesian National Police (Polri), which was then issued in Police Report Number LP/B/015/III/2023/SPKT/Bareskrim Polri on March 14, 2023. This report became the basis for the further legal process in resolving this dispute.

From the case chronology above, it can be understood that there is an alleged fraud committed by Dani Bahdani. Dani Bahdani attempted to file a lawsuit against Mabes TNI regarding resident-owned land in Jatikarya by giving blank *girik* forms to Candu bin Godo and 78 people, which he then filled out himself without the knowledge of the relevant residents. The blank *girik* forms filled out by Dani Bahdani were then used as 'proof of ownership' in the lawsuit against Mabes TNI. However, Mabes TNI found irregularities in the lawsuit, so they instead reported Dani Bahdani to the police. As a result, Dani Bahdani had to undergo a long legal process, although he was eventually acquitted.

Nevertheless, after the case proceeded, the trial results showed a different reality. The Bekasi City District Prosecutor's Office (Kejari) executed Dani Bahdani to the Bulak Kapal Correctional Institution (Lapas), Bekasi, on March 20, 2025. This action was taken after the Supreme Court (MA) upheld a prison sentence of 1 year and 6 months related to the case of document forgery in the dispute over land owned by Mabes TNI. This execution was carried out in accordance with the Supreme Court cassation decision Number 225K/Pid/2025 dated February 28, 2025. Simultaneously, this decision overturned the Bekasi District Court (PN) Decision Number 484/Pid.B/2023/PN Bks issued on August 14, 2024, where previously there was a different verdict that

acquitted Dani Bahdani (Editor Publik, 2025). With this decision, the status of this case has permanent legal force or *inkracht*, meaning that Dani Bahdani indeed committed an unlawful act in this case.

As a case that is already *inkracht*, it is essentially finished. All investigation and inquiry processes have also been completed. Therefore, essentially all obstacles or challenges faced by the investigators have been overcome (Indrawan & Munandar, 2022). However, information about the obstacles faced by the investigators was not published, so in facing similar cases, information about these potential obstacles is not widely known. For this reason, the researcher wants to reveal in more detail the factors that became obstacles in handling this land certificate forgery case by investigators at Unit 3, Sub-directorate 2, Dittipidum, Bareskrim Polri. Considering the complexity of this case, knowing the various possible obstacles will help the investigation process for similar cases in the future.

This case is quite complex because it highlights the intricate relationship between civil, administrative, and criminal law, and involves sensitive issues such as state asset land disputes and land mafia. Based on this, the researcher is interested in studying this case further, especially considering that the disputed land essentially belongs to the TNI, but after holding the land rights for so long, the TNI faced a lawsuit from Dani Bahdani. Based on this background, this research has several objectives, including: to analyze the event of the lawsuit by the perpetrator, analyze the process of handling the lawsuit case by Unit 3, Sub-directorate 2, Dittipidum, Bareskrim Polri, and analyze the factors that became obstacles in handling the case.

2. Methodology

This research uses a qualitative research type. Furthermore, the research design used is descriptive research. The choice of descriptive research in this study is because the researcher wishes to describe the conditions faced during the law enforcement process of the land certificate forgery case of Mabes TNI by Mr. Dani Bahdani handled by Unit 3, Sub-directorate 2, Dittipidum, Bareskrim Polri. This research also uses a case study research method based on the reason that this method is more intensive than other qualitative research, thus allowing for a deeper understanding of the phenomenon under study and obtaining a more complete picture of the research subject.

Primary data sources in this research come from interviews conducted with informants, namely members of Unit 3, Sub-directorate 2, Dittipidum, Bareskrim Polri, especially the Polri investigators involved in the law enforcement process of the land certificate forgery case of Mabes TNI by Dani Bahdani, ATR/BPN, and the Prosecutor's Office. In this research, the researcher will use secondary data in the form of Official Reports of Examination (BAP), as well as the Bekasi District Court (PN) Decision Number 484/Pid.B/2023/PN Bks and the Deed of Notification of the Supreme Court of the Republic of Indonesia Decision Number: 225 K/Pid/2025 Jo. Number: 377/Pid.B/2024/PN.Bks.

This research uses two main techniques for data collection. First, interviews, conducted with key informants namely Investigator Heru Saputra, S.H., and Dr. Yustinus Bowo Dwinugroho as the Head of Sub-unit 3, Sub-directorate II, Dittipidum, Bareskrim Polri. Both were chosen due to their direct involvement in the investigation process of the land certificate forgery case committed by Dani Bahdani. Second, this research uses documentation studies to obtain supporting data sourced from internal law enforcement documents, such as investigation files, as well as external documents like books, journals, news, and other relevant references. This technique helps strengthen the understanding and analysis of the case under study.

This research uses data source triangulation to ensure data validity. Triangulation is performed by comparing information from various sources, methods, and different times, so the truth of the data can be verified more robustly. Through the use of diverse sources such as interviews, observation, documents, archives, and official records, the researcher can obtain a more comprehensive view and ensure consistency among informants. Thus, data is considered valid if there is consistency of information from various different sources.

Data analysis is conducted qualitatively and occurs continuously from the initial research process until the end. Referring to the Miles & Huberman model, this analysis includes three main stages: data reduction, which involves filtering and selecting important information; data display, which involves structuring data

systematically for easy understanding; and verification and conclusion drawing, which involves connecting data with theory and producing valid findings. This approach allows the researcher to build a deep and descriptive understanding of the phenomenon under study.

3. Results and Discussion

3.1. Background of the Lawsuit Event by Dani Bahdani

The negotiation efforts and their agreement were carried out by paying an amount of money according to the agreement, and then the landowners surrendered their underlying rights (in the form of *girik*) and a Statement of Release of Rights Letter was made at the Jatikarya Village Hall Office. This was done so that the negotiation efforts and their agreement proceeded well and smoothly without disputes between the two parties, as required by the legislation regarding legal land ownership in Indonesia. The requirements for legal land ownership in Indonesia include two main aspects, namely 1) the legal aspect, related to the legality of land acquisition; and 2) the administrative aspect, related to the process of registration and recognition of land rights.

Thus, it can be said that the efforts made by Mabes TNI were in accordance with the legislation. Furthermore, Mabes TNI's efforts are also in line with what is stated in Article 23 of Government Regulation 24 of 1997, which states that to register land rights for land that emerged after the enactment of the Basic Agrarian Law (UUPA), it can be proven with:

- a. A decree granting rights over state land or management rights land from the authorized official;
- b. A deed granting Right of Use or Right to Build over Right of Ownership land from the Land Deed Official (PPAT);
- c. A deed of agreement;
- d. A deed of separation of ownership rights over a condominium unit; and
- e. A deed granting a mortgage right.

This conformity can be seen from the fact that after obtaining agreement and approval from the local community, Mabes TNI then registered the land to obtain ownership rights over it. The registration efforts then resulted in the issuance of Decree of the Head of the West Java Provincial BPN Office Number 174/HP/KWPBPN/1992 dated July 18, 1982, concerning the grant of Right of Use in the name of the Department of Defense and Security c.q. Directorate General of Material, Facilities, and Services for an area of 983,430 M2 located in Jatimamur and Jatisampurna Villages, Pondokgede Sub-district, Bekasi Regency, for the land in Jatikarya used for TNI senior officers' housing, which was then certified as Right of Use Certificate No. 1/Jatikarya Village with an area of 485,030 M2 in the name of Dephan c.q. Ditjen Matfasjasa, and for the land in Jatimakmur with an area of 498,400 m2 certified as Right of Use Certificate Number: 12 in the name of Dephan c.q. Ditjen Matfasjasa.

In the case of the lawsuit over Mabes TNI's land ownership in Jatikarya by Dani Bahdani, based on the Official Report of Examination, Dani Bahdani admitted that he was asked to assist the community in implementing the agreement with the TNI party, who wanted them to release their land to the TNI by signing a statement letter. After seeing the statement letter, the community objected because they felt they had never sold the land object. Then, it was also said that the TNI party who had faced Dani Bahdani withdrew, thus canceling the signing effort. At that time, the TNI was also said to have given a document signed by M. Adul to the community present there, but this was refuted by Adul, who said that he did not sign the letter. Seeing this, as the head of Jatikarya Village, M. Adul, then gave a mandate to Dani Bahdani to assist the residents in legally challenging the TNI and provided a statement letter explaining that he had never signed a sale and purchase deed and a statement of release of rights in the name of Hankam, Mabes TNI. After receiving the letter, Dani Bahdani then gathered with the residents to continue the resistance effort by collecting evidence in the form of documents and witnesses. After the resistance plan was mature, Dani Bahdani then asked Satin Atas Asih and Udin Bin H Sadja to collect residents' ID cards to create a power of attorney, which was then signed by 78 landowners in Jatikarya to file a civil lawsuit at the Bekasi District Court on October 31, 2000. From this lawsuit, the Bekasi District Court Decision Number 199/Pdt.G/2000/PN.Bks Jo. Bandung High Court

Decision No.: 208/Pdt/2002/PT.Bdg Jo. Supreme Court Cassation Decision Number 2630-K/PDT/2003 Jo. Supreme Court Peninjauan Kembali (PK) Decision Number 218-PK/Pdt/2008 Jo. Supreme Court PK II Decision No. 815-PK/Pdt/2018 was issued, which resulted in the Ministry of Defense/Mabes TNI having to pay land compensation to the Plaintiffs amounting to IDR 228,713,400,000 (two hundred twenty-eight billion seven hundred thirteen million four hundred thousand rupiah), and subsequently the land object had been made the object of a binding agreement as per the Deed of Binding Sale and Purchase and Power to Sell made before Notary Rawat Erawady, S.H, M.Kn, potentially causing loss to Mabes TNI and the potential loss of rights over the land.

The statement given by Dani Bahdani contradicts the statement given by Mabes TNI in the police report Number: LP/B/015/III/2023/SPKT/Bareskrim Polri, dated March 14, 2023, in the name of the Reporter ASEP SUPRIYATNA, S.H. In the report, it is stated that Dani Bahdani visited residents who owned land in Jatikarya, Mr. Satin, and then explained the condition of the Jatikarya land, stating that the Hankam party would seek a peaceful settlement with the residents and would provide a sum of money, so Mr. Satin was given the task of collecting residents' ID cards. Lured by the offer mentioned by Dani Bahdani, Mr. Satin joined the team of Mr. H. Dani Bahdani, S.H. along with Mr. H. Sa'aman Bin Laisan, Mr. Saja Bin Saenan, and Mr. Nemin H.S. During the process, Mr. Satin complained to Mr. H. Sa'aman Bin Laisan when he found out that after collecting residents' ID cards and making statements as landowners/heirs, the residents were directed to sign profit-sharing agreements and power of attorney letters appointing Mr. H. Dani Bahdani, S.H. as the residents' legal representative to sue Hankam. Satin was also given a *girik* document C 529 in the name of MINIM Bin KEBOEL made by Dani Bahdani.

Besides Satin, Dani Bahdani also visited the late H. Sa'aman Bin Laisan to ask the late H. Sa'aman Bin Laisan to become the team leader to invite the heir community to bring original ID cards, photocopies of ID cards, or ID card receipts, with the aim of creating heir certificates and power of attorney over the land to be used as evidence in order to sue the TNI Institution, which was considered not to have complete data on land ownership in Jatikarya Village. At that time, the defendant convinced the heirs not to worry about the *girik* evidence that was no longer available because it had been surrendered by their parents to PT. Usama Rahayu when receiving compensation. At that time, H. Saaman said, "The main thing is that residents who own land in the HANKAM block just follow along if indeed asked to be witnesses or provide information if it's unclear. Just ask the witness, if indeed someone asks for proof of ownership of a letter, the witness will give the photocopy of the fathers' ownership, for now what is available is only the statement and power of attorney for heirs."

To sue the TNI Institution over land ownership in Jatikarya, Dani Bahdani asked the late H. Sa'aman Bin Laisan to hand over blank *girik* forms to him to be filled out, but Mr. Sarom did not see when and where the forms were filled. These blank *girik* forms, filled out by Dani Bahdani, were then used as 'proof of ownership' in the lawsuit against Mabes TNI. Even both of them also promised that if the land takeover was successful, the proceeds from the land sale would be shared, 60% for the residents and 40% for Dani Bahdani. Although in reality, there were heirs who did not know and never gave approval to Dani Bahdani to create a power of attorney for him to file a civil lawsuit, Dani Bahdani and H. Saaman still endeavored to create a power of attorney that appeared to have been known and approved by all those heirs.

This statement clearly shows that Dani Bahdani intended and deliberately created a false power of attorney, making it seem as if the heirs knew and approved of the civil lawsuit effort he would undertake. In relation to this, Topo Santoso (in Santosa (2016)) explains that the act of forging a document is certainly done by fulfilling the element of intent, because this action is carried out through a conscious effort by the maker/user of the document itself for their benefit. The benefit here includes the interest in creating a certain desired right, creating an obligation or debt relief, or intending to use it as evidence. Furthermore, he also states that the act of forgery can be punished when there is intent from the perpetrator. The perpetrator here must have the intention or purpose to use an item whose condition is not true by portraying the condition of the item as if it were original, according to the perpetrator's intention, so that others believe in that portrayal. Although it needs to be accompanied by the element of benefiting oneself or others (this differs from the type of fraud), the act must cause a detrimental condition as formulated with the element "can cause loss" as a result of the writing or document (Santosa, 2016).

In relation to Dani Bahdani's lawsuit case, the mentioned detrimental condition refers to the potential loss experienced by Mabes TNI due to the lawsuit, both material and immaterial loss. In the Bekasi District Court Decision Number 199/Pdt.G/2000/PN.Bks, the total material loss that could be experienced by Mabes TNI due to the lawsuit reached IDR 10,000,642,686,000 (ten trillion six hundred forty-two million six hundred eighty-six thousand rupiah). Meanwhile, the potential immaterial loss that could be experienced by Mabes TNI due to the lawsuit refers to the loss of Mabes TNI's right to use the land.

After the inkraft decision from the Bekasi District Court, Mabes TNI received information from the Bekasi City Land Office and the Ministry of ATR/BPN RI that Right of Use Certificate Number 1/Jatikarya Year 1992 was not crossed out/canceled, thus the legality of Right of Use Certificate Number 1/Jatikarya Year 1992 in the name of Dephan c.q. Ditjen Matfasjasa until now is still legally valid because BPN Bekasi did not cancel it and acknowledges that Right of Use Certificate Number 1/Jatikarya Year 1992 remains validly owned by the Ministry of Defense/TNI. This then raised the suspicion that the 78 (seventy-eight) *girik* used as evidence by the Plaintiff in the Civil Lawsuit at the Bekasi District Court Number 199/Pdt.G/2000/PN.Bks were fake. This suspicion prompted Mabes TNI to gather information regarding the alleged document forgery (in this case, *girik*) used by the plaintiff Candu Bin Godo and 78 other plaintiffs in lawsuit Number 199/Pdt.G/2000/PN.Bks. From the investigation and inquiry conducted, several facts were discovered, including:

- a. The results of checking and examining 73 original *girik*/Letter C books in the land register located in Jatikarya Village for the TNI Senior Officers' Housing Complex, Jatikarya, and in that book, it was recorded that there were 87 (eighty-seven) *girik* which, since 1974, were known to have undergone a change of ownership from originally customary community land to Hankam project land. This means that administratively and in terms of land law, the land had legally become the property of the Hankam Project (now Right of Use Certificate No. 1/Jatikarya Village with an area of 485,030 M2 in the name of Dephan c.q. Ditjen Matfasjasa).
- b. The non-appearance of Notary Haji Abu Jusuf, S.H., who made Deed Number 11 of 1999, led Mabes TNI to coordinate with said Notary, who stated that it was true that he was not presented during the trial, thus weakening the evidence from the Ministry of Defense/Mabes TNI.
- c. The 78 (seventy-eight) *Girik* in the Civil Lawsuit at the Bekasi District Court Number 199/Pdt.G/2000/PN.Bks are suspected to be fake because all 78 (seventy-eight) *girik* should be at the Bekasi City Land Office as part of the file for right of use certificate 1/Jatikarya.
- d. Regarding the land object owned by Dephan c.q. Ditjen Matfasjasa according to Right of Use Certificate No.1/Jatikarya, starting from 1998, a Tax Object Number has been issued in the name of Dephan c.q. Ditjen Matfasjasa.
- e. There was additional evidence from the plaintiff as per number P-149, which contains a Statement Letter from "CORPS COMMANDER, SECURITY DEFENSE HEADQUARTERS" stating that if land of 50 Hectares was not purchased by the SERVICE, as of July 1, 1974, it was FULLY RETURNED TO ITS OWNER... etc. However, after checking the document at the Bureau of Administrative Affairs of the Secretariat General of the Ministry of Defense, it was found that the letter did not exist and was not recorded in the outgoing mail register, and upon checking, there were several irregularities in the writing and seal of the letter.
- f. There is land data registered with Right of Use Certificate No.1, Jatikarya Village, dated July 18, 1992, in the name of Dephankam Cq. Ditjen Matfasjasa with a land area of 485,030 M2, and the land has been recorded in the State Property Inventory of Mabes TNI since September 23, 1996, with land registration number 20203074 and recorded in SIMAK BMN No. KIB 2.01.01.01.002.21; and this data has never been crossed out or deleted.
- g. The existence of payment archives in the form of KU 17 three times with (1) No. PRIN/Staf-2/180/KPK/2/1973 dated February 20, 1973; (2) No. PRIN/Staf-2/214/KPK/2/1973 dated February 27, 1973; and (3) ABRI Staf Hankam and SP3 from and Korma Hankam dated May 12, 1999.

These data indicate that there is a discrepancy/difference between the lawsuit from Dani Bahdani's party and the data owned by the TNI. Based on TNI's data, the land object in Jatikarya is the property of Mabes TNI, obtained legally through its land acquisition efforts in 1972-1974. Whereas, based on Dani Bahdani's lawsuit,

it is known that Candu and 78 others used their respective *girik* to file a lawsuit against Mabes TNI. However, in reality, the *girik* used as evidence were still at the Bekasi City Land Office. Even from the in-depth investigation conducted by Mabes TNI, the existence of the Jatikarya Village Letter C Book was found, explaining that there were 70 Jatikarya Village Letter Cs whose names had already transferred from resident land to Hankam (Defense and Security) project land. This condition clearly shows that the land which is the object of dispute in Jatikarya had been acquired by Mabes TNI and was then used by Mabes TNI for the Hankam project's interests.

In the lawsuit, Dani Bahdani did not use the original *girik* documents as evidence. This means that the *girik* documents used by Dani Bahdani to sue Mabes TNI were not valid documents because they were not formal documents issued by BPN, as stated by legal positivism theory that positive law is the only valid source or highest authority, including regarding valid sources regulating land ownership rights. According to Land Law, land ownership rights can be proven through the possession of several pieces of evidence, such as land certificates, *girik* or Letter C documents, sale and purchase deeds, and so on. In this case, the land certificate related to land ownership in Jatikarya Village refers to the right of use certificate in the name of the Department of Defense and Security c.q. Directorate General of Material, Facilities, and Services, as stated by Heru Saputra, SH, investigator from ATR/BPN. Furthermore, the *girik* or Letter C documents regarding land ownership in Jatikarya Village are also known to have transferred ownership from resident land to Hankam project land, as stated by Heru Saputra, SH, investigator from ATR/BPN. Thus, the land certificate forged by Dani Bahdani violates positive law because the document is invalid and not issued by an official institution. Therefore, ownership based on a fake certificate, as happened with Dani Bahdani, is invalid.

In other words, the Jatikarya land dispute occurring from 1995 until now is an act carried out by Mr. H. Dani Bahdani, S.H. as the legal representative acting on behalf of the resident heirs, namely Candu bin Godo et al., 78 people. Based on these facts, Mabes TNI then reported it to Polri, which was then followed up by Polri by issuing Police Report Number: LP/B/015/III/2023/SPKT/Bareskrim Polri, dated March 14, 2023, in the name of the Reporter Asep Supriyatna, S.H.

3.2. The Process of Handling the Dani Bahdani Lawsuit Case by Unit 3, Sub-directorate 2, Dittipidum, Bareskrim Polri

The forgery of land certificates as carried out by Dani Bahdani in his lawsuit against Mabes TNI is a form of criminal act, as regulated in Article 263 of the Indonesian Criminal Code (KUHP) concerning Document Forgery. Therefore, the police apparatus has a role in enforcing the law against this case.

In handling the Dani Bahdani lawsuit case, these law enforcement efforts were carried out by Unit 3, Sub-directorate 2, Dittipidum, Bareskrim Polri. In its implementation, Unit 3, Sub-directorate 2, Dittipidum, Bareskrim Polri applied investigation management to conduct the investigation of the Dani Bahdani lawsuit case. Investigation management is a process carried out to plan, organize, and manage tasks, information, and people involved in the investigation process so that the investigation process can run smoothly and effectively. This investigation management is regulated in Chief of Police Regulation (Perkapolri) No. 14 of 2012 concerning the management of criminal offense investigations.

The investigation plan for the Dani Bahdani lawsuit case emphasized the use of evidence strategies to collect strong evidence to prove the suspect's actions. Evidence plays a crucial role in handling document forgery cases. Without sufficient and admissible evidence, a document forgery case cannot be successfully prosecuted. Traditionally, physical evidence and witness testimony have been the main types of evidence used to support investigations. However, such evidence, especially witness testimony, is highly vulnerable to inaccuracy due to human memory limitations, external pressure, and personal bias (Bakhtiar et al., 2025).

Manangin et al. (2022) stated that police officers need to have competence and master investigation/interrogation techniques, including effective interrogation techniques, to ensure that suspects can provide true statements that can be used as evidence. Furthermore, the limitations of conventional evidence also highlight the urgent need for the use of scientific methods in investigation. Relying solely on witness statements, confessions, or indirect evidence is no longer sufficient, as criminals increasingly utilize technology to obscure their activities and avoid detection. Thus, integrating forensic science into criminal investigations is essential to ensure accuracy, reliability, and fairness in the modern era. Therefore, in

investigating the Dani Bahdani lawsuit case, Unit 3, Sub-directorate 2, Dittipidum, Bareskrim Polri prioritized the use of Scientific Crime Investigation (SCI) to ensure the accuracy and reliability of both direct and indirect evidence collected.

Scientific Crime Investigation (SCI) is an evidence system in the investigation process that utilizes science and technology or utilizes forensic functions. Forensic functions in this context include forensic identification, forensic laboratories, forensic psychology, forensic medicine, and various other forensic science expertise (Putra R. M., 2021). Scientific Crime Investigation (SCI) is an approach in the investigation process that prioritizes various scientific disciplines in efforts to uncover criminal acts (Sativa, 2021). This SCI method emphasizes analysis involving various sciences to uncover criminal acts so that confessions given by suspects receive the last rank in the evidence to be presented in court, while findings from experts are considered more comprehensive evidence.

In Indonesia, the use of SCI has been regulated in the Regulation of the Chief of the Indonesian National Police Number 6 of 2019 concerning Criminal Offense Investigations, specifically Article 34, which explains that scientific proof or scientific crime investigation is a form of technical assistance for investigation that can be used by investigators in conducting criminal offense investigations. Several forensic activities are included in this technical investigation assistance, namely forensic laboratories, identification, forensic medicine, forensic psychology, and digital forensics. The forensic laboratory then becomes one of the crucial functions, which in Article 35 of the regulation is explained to function as a place for the examination and testing of evidence by investigators, especially evidence that requires special handling and/or treatment.

Forensic laboratories essentially provide three main outputs: testimony, laboratory reports, and documentation and data supporting the laboratory reports and testimony (Wickenheiser, 2021). Documentation and data in this context consist of various items but have one goal: to provide supporting data and documentation to support the interpretation found in the laboratory report and any potential testimony based on that report. Without such supporting data and documentation, the laboratory report would not be strong evidence and could not be produced in the first place. Documentation and data then become a supporting structure for the other laboratory outputs, namely testimony and laboratory reports. According to Wickenheiser (2021), this support is depicted with a pyramid showing testimony at the top, based on reports and data below it. This depiction can be observed in Figure 1.

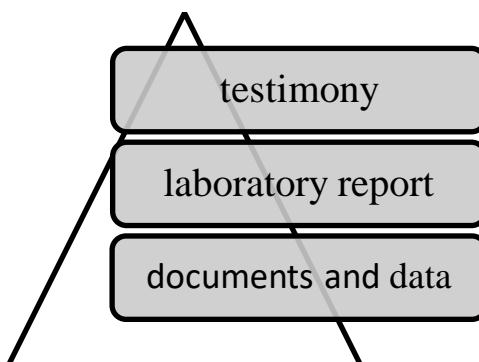


Figure 1. Forensic Laboratory Output Pyramid

Therefore, in investigating the Dani Bahdani lawsuit case, Unit 3, Sub-directorate 2, Dittipidum, Bareskrim Polri collaborated and coordinated with the Center for Forensic Laboratories (Puslabfor) to support the process of collecting valid and strong evidence.

Based on the Regulation of the Chief of the Indonesian National Police Number 6 of 2019 concerning Criminal Offense Investigations, the forensic laboratory relates to the function within the Indonesian National Police as an agency given the duty and obligation to produce evidence of criminal acts based on investigation activities carried out by utilizing various forensic technologies and sciences. This includes forensic chemistry, forensic medicine, and other supporting sciences (Nugroho & Heriyanto, 2020). The output of the forensic laboratory is in the form of results based on scientific principles. The forensic laboratory then serves the function of providing services that support the law enforcement process (Suwirno, 2021).

In its implementation, Puslabfor conducts physical document examinations using several analysis techniques, such as ink and paper analysis techniques, and forensic document examination (questioned document examination). Ink and paper analysis is usually performed to determine if documents were created at the same time, while forensic document examination (questioned document examination) is used to compare the authenticity of signatures, stamps, handwriting, and even the ink used. Forensic document examination (questioned document examination) is a unique branch of forensic science that continues to evolve with technological advancements. Moreover, document examination plays a very important role in resolving civil and criminal cases of fraud, forgery, and counterfeiting of security documents. This is because the forgery of certain types of signatures may be so successful that it cannot be detected by anyone, and especially cannot be detected by an inexperienced observer (Gupta, 2020). Therefore, knowledge of document examination is essential in the criminal justice process, as it helps identify and handle cases of document-related fraud.

Angel & Kelly (2020) stated that forensic document examination aims to determine the authorship or non-authorship of disputed and collected documents. This is because every document has physical characteristics and composition that scientists can analyze to determine how and why the document was created, who its author is, and whether the document can serve as evidence of a crime. Trained and skilled forensic document examiners in the science and art will analyze the disputed documents, then reveal the truth by obtaining scientific information during the forensic analysis of the disputed documents related to criminal cases of fraud and forgery. In relation to the Dani Bahdani lawsuit case, forensic document examination was conducted to analyze the authenticity of the disputed land certificate documents. The results of this analysis were then compared with witness statements and BPN document data so that the truth regarding the document's authenticity could be found.

In the investigation of the Dani Bahdani lawsuit case, forensic investigation techniques, including forensic document examination, successfully proved the use of fake *girik* by Dani Bahdani when the lawsuit was filed against Mabes TNI. Based on the results of the forensic document examination, discrepancies were also found between the disputed land ownership data held by ATR BPN and the statements given by Dani Bahdani.

Furthermore, in the implementation of the investigation, according to Sitorus & Amal (2022), formally and procedurally, an investigation process is considered to have started since the issuance of an Investigation Order (Surat Perintah Penyidikan) issued by an authorized official at the investigating agency, after the police receive a report or information about a criminal act, or know themselves about an event suspected to be a criminal act. Besides preventing abuse of authority by the police, the existence of an Investigation Order is a guarantee of protection for the rights possessed by the suspect (Husein, 1991). Similarly, in the investigation of the Dani Bahdani lawsuit case, the investigation process was carried out after Unit 3, Sub-directorate 2, Dittipidum, Bareskrim Polri received the report made by Mabes TNI in Police Report Number: LP/B/015/III/2023/SPKT/Bareskrim Polri, dated March 14, 2023, in the name of the Reporter Asep Supriyatna, S.H. The police report was then responded to and followed up by issuing an Investigation Order to conduct an inquiry and investigation into the incident. After the investigation process produced sufficient evidence, the investigators from Dittipidum Bareskrim Polri then named Dani Bahdani as a suspect.

The designation of Dani Bahdani as a suspect was based on at least two valid pieces of evidence in accordance with Article 184 of the Criminal Procedure Code (KUHAP), which includes witness testimony, expert testimony, documents, indications, and the defendant's statement. In cases of document forgery, original document evidence, witness testimony witnessing the process of making or using fake documents, and the results of forensic expert analysis of documents usually form a strong basis for naming someone as a suspect. This process must also fulfill the principle of due process of law, meaning the suspect has the right to provide a defense or further statement in the legal process. The suspect designation must be accompanied by a suspect designation letter, and the suspect has the right to be accompanied by legal counsel. If proven, the suspect can be proceeded to the prosecution stage by the prosecutor and then tried in court. In this case, the investigators used witness testimony, expert testimony (from academics, Puslabfor, and practitioners), documents, indications, and the defendant's statement as evidence to name Dani Bahdani as a suspect and to charge Dani Bahdani with committing the criminal act of making false documents and/or intentionally using false documents and/or participating in the criminal act as intended in the formulation of Article 263

paragraph (1) of the Indonesian Criminal Code (KUHP) and/or paragraph (2) of the KUHP Jo. Article 55 paragraph (1) 1e of the KUHP.

In the investigation process of the Dani Bahdani lawsuit case, supervision efforts were also carried out at every stage of the ongoing investigation. This is in line with what Sujamto (in Putra (2019)) said, that supervision is any effort or activity to know and assess the actual reality regarding the implementation of tasks or activities, whether it is in accordance with what it should be or not. Then, according to Mc.Ferland (in Putra, 2019), supervision is a process where a leader wants to know whether the results of the work carried out by subordinates are in accordance with the plans, orders, goals, or policies that have been determined (Putra, 2019). Thus, it can be concluded that supervision is an activity to obtain certainty whether the implementation of activities has been carried out according to plan.

Supervision activities essentially compare existing conditions with what should happen. In general, supervision helps management in three ways: (1) improving organizational performance, (2) providing an opinion on organizational performance, and (3) directing management to make corrections regarding existing performance achievement problems. This supervision is aimed at creating an efficient and effective organization oriented towards achieving its vision and mission. In its implementation, this supervision has two main objectives: accountability and the learning process. In terms of accountability, the supervision system will ensure that development funds are used in accordance with ethics and legal rules to fulfill a sense of justice. Whereas in terms of the learning process, the supervision system will provide information about the impact of the program or intervention carried out, so that decision-makers can learn about how to create more effective programs. Thus, through this supervision, it is hoped that input can be obtained for policymakers to: (1) eliminate mistakes, deviations, waste, obstacles; (2) prevent the recurrence of such mistakes, deviations, waste, obstacles; and (3) find better ways to achieve goals in carrying out the main tasks and functions of the organization and achieving the organization's vision and mission (Herbasuki, 2015).

Rahmawati et al. (2018) stated that supervision is one of the most important principles in criminal procedural law, stating that the parties are supervised by all criminal justice institutions in the interest of guaranteeing the rights and freedoms of citizens and the public interest, with the aim of ensuring the system runs well. This is because follow-up and criminal investigation in the criminal process require essential judicial measures, such as summons, prosecution, arrest, and obtaining statements from the defendant, indicating that all these actions are the meeting point between the rights and freedoms of the defendant and the public interest of the community and the rights of the perpetrator. These actions contradict the presumption of innocence principle, where the rights and freedoms of the defendant are restricted or negated before the crime is proven. Therefore, supervision of the criminal procedural process has an important role and position in a fair judicial process. To protect the rights of the defendant while also protecting the rights of victims and society, it is important to take special measures to control and monitor the implementation of fair judicial procedures in the criminal justice process.

This is what Dittipidum Bareskrim Polri did; to conduct a fair investigation process, the superiors of Unit 3, Sub-directorate 2, Dittipidum, Bareskrim Polri carried out supervision at every stage of the investigation process. This supervision effort by the superiors successfully made the investigation process of the Dani Bahdani lawsuit case carried out by Unit 3, Sub-directorate 2, Dittipidum, Bareskrim Polri run well and effectively, and in accordance with the Criminal Procedure Code and Chief of Police Regulation No. 6 of 2019 concerning investigation management. The effectiveness of the investigation process can be seen from the investigators successfully collecting all the evidence needed to bring the case to the next level, prosecution.

3.3. Factors Constraining Case Handling

In handling the Dani Bahdani lawsuit case, Unit 3, Sub-directorate 2, Dittipidum, Bareskrim Polri faced several factors that became constraints. According to Lawrence M. Friedman (in Razak, 2023), there are three factors that can influence the law enforcement process, including (Razak, 2023):

3.3.1. Structure

According to Lawrence M. Friedman, the legal system has a structure which is a permanent form that keeps the process within certain boundaries. The elements of this legal structure include institutions tasked with enforcing the law, such as the police, prosecution, courts, and correctional institutions. Furthermore,

Friedman (2019) explains that "structure also means how the legislative body is organized... what procedures are followed by police departments, and so on. Structure, in essence, is a kind of cross-section of the legal system... a kind of still photo, freezing the action." Ali (2002) also stated that structure is the pattern that shows how the law is implemented according to its formal provisions. This structure shows how courts, lawmakers, and legal bodies and processes operate and are run. In other words, this factor encompasses everything related to law enforcement institutions and the law enforcement processes they carry out, including their capacity, professionalism, integrity, and commitment in enforcing the law.

In relation to handling the Dani Bahdani lawsuit case, this factor refers to Unit 3, Sub-directorate 2, Dittipidum, Bareskrim Polri and the Prosecutor's Office, which play the roles of the main investigator and public prosecutor in the Dani Bahdani lawsuit case.

Interview results showed that the police and the Prosecutor's Office have cooperated and coordinated well; even the results of every stage of the case handling were reported periodically and continuously to monitor the development of the law enforcement of the case. If investigators and public prosecutors do not coordinate, it will affect the case resolution process or hinder the application of the coordination principle between investigators and public prosecutors. Therefore, communication and coordination between the police and public prosecutors are necessary to prevent overlap in carrying out their duties and authority obligations.

Saktiawan et al. (2025) stated that the effectiveness of law enforcement heavily depends on good coordination between the various elements involved, including law enforcement officials, judicial institutions, and the community. Yusuf DM et al. (2025) also stated that to achieve law enforcement effectiveness, synergy among various related parties is needed, especially law enforcement officials, so cooperation between the police, prosecution, and courts is very important to ensure that the legal process runs smoothly and is not hindered by excessive bureaucracy. Thus, the cooperation and coordination carried out by the police and the Prosecutor's Office have made the handling of the land certificate forgery case by Dani Bahdani run effectively. Therefore, it is not surprising that this case could be resolved well.

Furthermore, the law enforcement process carried out by the police and the Prosecutor's Office is also influenced by the budget resources and supporting facilities and infrastructure owned by these law enforcement institutions. These two factors are elements that determine the success of the law enforcement process implementation because without adequate budget, supporting law enforcement facilities and infrastructure cannot be fulfilled. This means that the availability of such supporting facilities and infrastructure also becomes inadequate. This inadequacy ultimately hinders the law enforcement process. Saputra (2025), in his journal article, stated that the limited supporting facilities and infrastructure, such as document forensic laboratories, have caused police officers to experience difficulties in obtaining technically valid evidence, which ultimately makes the evidence process less than optimal and the overall law enforcement process hindered. Nelson (2023), in his research on law enforcement in Indonesia, also stated that law enforcement officials, such as the police and prosecution, are often faced with resource constraints, both in terms of personnel and infrastructure, which make law enforcement implementation hindered, slow, and less effective.

These research results show that the availability of adequate budget and supporting facilities and infrastructure plays an important role in supporting the smoothness and effectiveness of the law enforcement process. Similarly, in handling the Dani Bahdani case, law enforcement officials were equipped with adequate budget and supporting facilities and infrastructure. As a result, the availability of these two aspects made the case handling process run well and smoothly.

3.3.2. Substance

Substance in the legal system can be understood as the provisions, norms, and actual behavior of individuals within the system. Additionally, substance is also interpreted as the output produced by people involved in the legal system, including decisions that have been issued or will be made. In this second aspect, Lawrence M. Friedman emphasizes the importance of living law, not just the provisions in written law (law books). Thus, legal substance relates to the laws and regulations in force, which are binding and function as guidelines for law enforcement officials. This also indicates that legal substance consists of substantive rules and how institutions should behave.

In relation to handling the Dani Bahdani lawsuit case, this factor refers to the legal rules and regulations used as the basis for carrying out law enforcement efforts in the land certificate forgery case committed by Dani Bahdani. The substance of law in Indonesia often does not reflect the principles of justice, certainty, and benefit of law proportionally due to basic problems such as inconsistency and multiple interpretations in the formulation of legislation. Many legal provisions are drafted with ambiguous language or open to double interpretation, thus creating legal uncertainty in their application. Besides that, overlapping regulations between sectors and between levels of government also often cause confusion for law enforcement officials, which not only complicates the law enforcement process but also has the potential to be exploited by certain parties to find legal loopholes.

In relation to this, Dr. Yustinus Bowo Dwinugroho, Head of Sub-unit 3, Sub-directorate II, Dittipidum, Bareskrim Polri, stated that "the legal basis used in handling this case is the Criminal Procedure Code (KUHAP), the Criminal Code (KUHP), and the Police Law."

Saputra (2025) stated that Article 263 of the Criminal Code (KUHP) concerning Document Forgery has substantive weaknesses, especially regarding the type of document meant in the Article. He said that Article 263 KUHP only stipulates the criminal act of document forgery in a general sense and has not elaborated specifically on the various types of documents intended, for example, land certificates, diplomas, powers of attorney, or other important documents. Furthermore, Article 263 KUHP concerning Document Forgery also has substantive weaknesses in the context of investigating land document forgery cases, often related to the difficulty of proving the "loss" element due to the non-specific formulation in the article. This is in line with what was put forward by Santosa (2016) that the difficulty in the legal process of forgery usually lies in proving the element of loss. Some law enforcers still view that loss is limited only to material loss, while immaterial loss is not considered a loss because it is difficult to determine.

This is because document forgery is essentially a crime that contains the element of an untrue or false condition of something (the object), where that something appears from the outside as if it looks true, but in reality, it is contrary to the actual situation, to realize its interest, ranging from the interest in creating a certain desired right, creating an obligation or debt relief, or intending to use it as evidence. Hendrawan (2015) stated that unlawful acts are caused by various elements, namely negligence and intent. In unlawful acts based on intent, the perpetrator has the intention to cause a specific loss to the victim or is convinced that their action can result in loss. Conversely, in cases of negligence, the perpetrator has no intention to cause loss and can even prevent the loss from occurring.

Chrysander & Gunadi (2022) stated that losses caused by unlawful acts are divided into two types: material and immaterial losses, which will be assessed monetarily. However, in the Criminal Code (KUHP), the loss element is not defined clearly and specifically; even in some articles of the KUHP, only the phrase "value of the loss" is used. As a result, in the law enforcement process, law enforcement officials tend to interpret the loss element only in the form of material loss and ignore immaterial loss. Consequently, if the reporter does not experience a loss that can be calculated with a nominal figure, their report cannot be processed (Santosa, 2016). Even if they do not experience material loss, the perpetrator is also acquitted, as happened in the Dani Bahdani lawsuit case in the Bekasi District Court (PN) Decision Number 484/Pid.B/2023/PN Bks. The judge stated that Dani Bahdani was not proven legally and convincingly guilty of committing the criminal act of document forgery because the lawsuit made by Dani Bahdani was deemed not to have caused real loss to Mabes TNI, such as transfer of rights or financial loss.

Next, the intent of the relevant national land regulations as conveyed by the Prosecutor's Office is the Land Law, namely the legislation regulating all matters related to land ownership rights, such as Law Number 5 of 1960, Government Regulation No. 10 of 1961, and Government Regulation No. 24 of 1997. In connection with this legal basis, the Prosecutor's Office revealed that law enforcement officials still face constraints related to the synchronization between the Land Law and the Criminal Code (KUHP), especially in terms of evidence collection due to the lack of integrated available land administration data. Moreover, the Criminal Procedure Code (KUHAP) does not specifically provide detailed guidance on procedures for investigating complex land documents, thus requiring investigators to coordinate with the National Land Agency (BPN), which has the potential to be a time-consuming process due to the complicated administrative and civil processes at the National Land Agency (BPN) or the administrative court. Therefore, the lack of an optimal coordination

mechanism between Police Investigators, the Prosecutor's Office, and BPN can hinder them in collecting valid evidence, thereby hindering the ongoing law enforcement process.

3.3.3. Culture

Legal culture refers to individuals' views toward the law and the legal system, including beliefs, values, thoughts, and expectations. Thus, it is part of the overall culture related to the legal system. Additionally, legal culture also includes the climate of social thought and social forces that influence how the law is applied, avoided, or misused. Without legal culture, the legal system would lose its power. Legal culture relates to the legal ethos that reflects the attitude of individuals (including the attitude of law enforcement officials) toward the law and its legal system. No matter how good the legal structure is designed to implement existing regulations and no matter how good the quality of the legal substance drafted, without support from the legal culture of all parties involved in the system and the community, law enforcement will not be effective.

In relation to handling the Dani Bahdani lawsuit case, this factor refers to the legal culture possessed by the community regarding the act of land certificate forgery and the community's legal awareness regarding the prevention and handling of such acts of land certificate forgery. In relation to the act of land certificate forgery, Dr. Yustinus Bowo Dwinugroho, Head of Sub-unit 3, Sub-directorate II, Dittipidum, Bareskrim Polri, stated that implicitly, communities with legal awareness tend to know and understand the applicable legal rules and apply the values contained in those legal rules into their actions and behavior in their daily lives, thus avoiding actions that are not in accordance with or contradict legal rules.

Then, the Prosecutor's Office added emphatically, stating that not all communities have the awareness that the action taken by Dani Bahdani was an act of document forgery, thus not realizing that such action could cause loss to others. This is in line with what was put forward by Saputra (2025) that many people still do not understand that document forgery is a serious criminal act because it can cause loss to other parties; it is often considered a common action rather than a crime. In other words, many Indonesians do not have knowledge and understanding regarding the criminal act of land certificate forgery, thus contributing to their vulnerability to becoming victims of land certificate forgery. In relation to the Dani Bahdani lawsuit case, the community became victims of Dani Bahdani by being used as subjects (plaintiffs) to obtain ownership rights over land in Jatikarya through the land certificate forgery efforts carried out by Dani Bahdani. Next, regarding the community's legal awareness of preventing and handling acts of land certificate forgery, Dr. Yustinus Bowo Dwinugroho, Head of Sub-unit 3, Sub-directorate II, Dittipidum, Bareskrim Polri, and the Prosecutor's Office interpreted that the community has good legal awareness and is willing to be involved in the law enforcement process of the Dani Bahdani land certificate forgery case.

In this context, the term awareness itself comes from the word conscious, which means aware, feel, know, or understand. Being aware means knowing, realizing, feeling. Awareness means consciousness, the state of a person who understands and comprehends the entirety of the constitution's content and values without any pressure, coercion, or command from outside to apply it in their daily life and to submit to all applicable laws (Rosana, 2014). Yoesana (2013) stated that legal awareness is then related to a person's attitude carried out voluntarily to obey all regulations and be aware of their responsibility. This will cause the person to be able to perform all their duties well without coercion. Furthermore, the person will be willing to comply with all regulations and carry out their duties.

A similar point was raised by Harisman (2021) that "public legal awareness greatly influences legal compliance, both directly and indirectly. Although sometimes a person's legal awareness does not automatically lead to compliance with the law because many social indicators influence it." Then Sudibya et al. (2022) also said the same thing, that legal awareness, legal compliance, and the effectiveness of legislation are three interrelated elements, where the awareness and compliance of the community with the law will make the implementation of applicable regulations effective. Massaro (1993) stated that one sign of citizens who have legal awareness is that they have constitutional literacy, which then guides and encourages them to participate in carrying out their duties as citizens, including their duty to participate in maintaining public security and order.

If linked to the law and the execution of police duties, then the manifestation of the application of legal awareness is that they will obey and implement all existing laws and regulations. If everyone obeys and

complies with the applicable legal rules properly, it can reduce or even eliminate unlawful actions or practices and crimes that occur in society. Furthermore, participation in the implementation of law enforcement to create public security and order can also be a form of realization of legal awareness. This condition clearly supports the execution of the duties and functions of the Indonesian National Police (Polri) to overcome and eradicate all legal violations and crimes that occur, ultimately allowing Polri to achieve its goal, which is to realize public security and order.

4. Conclusion

Based on the analysis of the research results, several conclusions can be drawn. The case originated from the legal land acquisition of Jatikarya in 1971, which resulted in Right of Use Certificate No. 1 in the name of the Department of Defense and Security, thereby establishing the land as a state asset. However, Dani Bahdani, together with Sama'an, collected resident signatures through power of attorney documents that were included without the heirs' consent and utilized fake girik to sue the Indonesian National Armed Forces Headquarters (Mabes TNI), despite the original girik remaining stored as state inventory. Regarding the use of these fraudulent documents, the Criminal Investigation Agency of the Indonesian National Police (Bareskrim Polri) conducted an inquiry and investigation based on Chief of Police Regulation No.14/2012 after receiving a report from Mabes TNI. Through a process of evidence collection that was both well-planned and supervised, the investigators ultimately named Dani Bahdani as a suspect. The investigation proceeded effectively, supported by a strong organizational structure, capable investigators, and adequate facilities; however, obstacles remained, including a lack of clarity in Article 263 of the Indonesian Criminal Code (KUHP), insufficient synchronization between land regulations and the Criminal Code, minimal integration of land data, and low public legal awareness concerning document forgery.

In connection with these research findings, several suggestions can be offered. The Indonesian National Police (Polri) needs to cooperate and coordinate with relevant government institutions to provide an integrated land administration data system, which would include data on ownership history and related documents, to facilitate the investigation of similar cases in the future. Furthermore, the Indonesian National Police should also cooperate and coordinate with pertinent government bodies to conduct legal socialization and education for the public. This initiative would focus on land ownership rights and proper land registration procedures, aiming to increase public understanding, knowledge, and legal awareness regarding land ownership, thereby helping citizens avoid becoming involved in behaviors and actions related to land certificate forgery.

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