

The Civil Rights of an Individual in a Certificate of Inheritance Proven to Have Been Based on Forged Documents

Candrika Arivia Apriliani^{1*}, Rachmi Sulistyarini¹, M. Sudirman¹

¹Faculty of Law, Brawijaya University Malang, Indonesia

*Corresponding Author E-mail candrikaarivia@student.ub.ac.id

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ABSTRACT

This study aims to analyze the civil rights of lawful heirs affected by a Certificate of Inheritance Rights proven to have been issued on the basis of forged documents and to examine the forms of civil liability arising from such unlawful conduct. This research employs a normative legal research method using both statutory and case approaches through the examination of legislation, legal doctrines, and the Supreme Court Decision Number 1470 K/Pid/2023. The findings demonstrate that document forgery in the preparation of a Certificate of Inheritance Rights gives rise to legal consequences in the form of the loss of inheritance rights, loss of recognition as a legal subject within inheritance relations, and deprivation of the right to control and enjoy the deceased's estate. Such conduct constitutes an unlawful act that contravenes the principles of legal protection and legal certainty. Civil liability toward the aggrieved lawful heirs is based on Article 1365 of the Indonesian Civil Code through the provision of compensation, the annulment of the legally defective Certificate of Inheritance, and the restoration of the original legal condition through the reinstatement of the lawful heirs' legal status. The novelty of this research lies in its focus on the restoration of heirs' civil rights resulting from the forgery of a Certificate of Inheritance from the perspective of legal protection and victims' rights recovery.

Keywords: Civil Rights, Certificate of Inheritance, Document Forgery, Unlawful Act, Civil Liability.

1. INTRODUCTION

Inheritance law constitutes an essential component of the Indonesian civil law system because it concerns the transfer of a person's rights and obligations to their heirs following death. Inheritance is not merely understood as a process of distributing property, but also as a legal mechanism aimed at ensuring legal certainty, protecting civil rights, and maintaining orderly administration within society. Article 830 of the Indonesian Civil Code stipulates that inheritance occurs solely as a consequence of death, meaning that a person's death directly gives rise to legal consequences for the parties concerned. Therefore, the process of determining and proving the status of heirs must be carried out carefully and based on legally accountable evidentiary grounds. (Peter Mahmud Marzuki, 2017).

In Indonesian legal practice, the determination of individuals who are legally entitled to inherit is established through a Certificate of Inheritance Rights. This document serves an important function as the basis for various legal acts, particularly those concerning the transfer of land rights through inheritance. The normative legitimacy of the Certificate of Inheritance Rights is recognized under Article 111 paragraph (1) letter c of the Regulation of the Minister of Agrarian



Affairs and Spatial Planning/Head of the National Land Agency Number 16 of 2021, which governs proof of heirship in land administration processes. Accordingly, the Certificate of Inheritance Rights serves not only an administrative function but also carries juridical consequences that determine the validity of legal actions undertaken based upon the document (Urip Santoso, 2015).

Nevertheless, in societal practice, the existence of a Certificate of Inheritance Rights does not always reflect the actual legal circumstances. Problems frequently arise when the document is prepared based on inaccurate information or even contains deliberate falsification of family lineage documents. Such falsification is commonly carried out to obtain particular benefits, especially regarding control over the deceased's estate. These actions demonstrate deviations from the principles of prudence and good faith that should serve as the foundation for the preparation of legal documents (Habib Adjie, 2014).

From a normative perspective, document forgery constitutes an unlawful act under criminal law as regulated in Law Number 1 of 2023 concerning the Criminal Code. However, the issue does not end within the criminal dimension alone. Under civil law, the use of documents containing false information as a basis for obtaining rights may be classified as an unlawful act when it causes losses to other parties. Consequently, forgery in the preparation of a Certificate of Inheritance Rights must be comprehensively understood by examining its implications for the civil legal relationships among the parties involved (Subekti, 2005).

The urgency of this issue becomes increasingly evident when linked to Supreme Court Decision Number 1470 K/Pid/2023, which revealed the provision of family lineage information inconsistent with factual circumstances as the basis for preparing a Certificate of Inheritance Rights. The document was subsequently used to gain control over land constituting part of the inheritance estate. In such circumstances, the Certificate of Inheritance Rights loses its fundamental function as an evidentiary instrument reflecting the truth and instead becomes an instrument for unlawfully acquiring rights (Teguh Prasetyo, 2012).

The issue becomes even more complex when lawful heirs are omitted from the Certificate of Inheritance Rights due to document forgery. Such actions directly violate civil rights guaranteed under Articles 1 to 3 of the Indonesian Civil Code. Fundamentally, every individual possesses inherent civil rights that cannot be arbitrarily deprived. The law even recognizes the rights of unborn children insofar as such recognition serves their interests. Therefore, excluding lawful heirs from the Certificate of Inheritance Rights constitutes a denial of civil rights and may be classified as an unlawful act (Subekti, 2005).

From the perspective of civil law, the loss of a person's status as an heir due to document forgery in a Certificate of Inheritance Rights not only causes material losses, but also results in the loss of legal recognition of the civil rights inherently attached to such person. In principle, inheritance rights constitute a part of civil rights arising from familial legal relationships and automatically emerge upon the opening of succession. When a person who legally possesses a blood relationship or legal relationship with the deceased is excluded from the Certificate of Inheritance Rights, such person consequently loses the ability to exercise various legal rights, including the right to obtain a share of the inheritance, the right to undertake legal actions concerning the inherited property, as well as the right to obtain legal protection regarding his or her status as an heir. This circumstance demonstrates that the forgery of inheritance documents essentially constitutes an unlawful deprivation of a person's civil rights, as it eliminates access to and legal recognition of rights that should otherwise be protected under civil law.

On the other hand, the absence of clear technical mechanisms concerning the form of legal claims, the responsible parties, and the categories of compensable damages in cases involving Certificates of Inheritance Rights prepared on the basis of forged documents further contributes to legal uncertainty. In fact, Article 1365 of the Indonesian Civil Code explicitly provides that any unlawful act causing loss obliges the perpetrator to compensate for such damages. The lack of clarity in implementing this norm has resulted in ineffective legal protection for heirs who suffer losses (Munir Fuady, 2013).

Based on these conditions, research concerning an individual's civil rights in a Certificate of Inheritance Rights proven to involve document forgery is both important and urgent. This study is intended not only to analyze the legal standing of the civil rights of disadvantaged heirs but also to examine the forms of civil liability that may arise from the use of a Certificate of Inheritance Rights prepared on the basis of forged documents. Accordingly, this research is expected to contribute both theoretically and practically to the development of inheritance law and civil law while simultaneously strengthening legal protection for injured parties through mechanisms of rights restoration and compensation (Peter Mahmud Marzuki, 2017).

2. RESEARCH METHODS

This study employs a normative juridical research method with a descriptive-analytical nature, focusing on the examination of legal norms embodied in statutory regulations, judicial decisions, and legal doctrines relating to an individual's civil rights in a Certificate of Inheritance Rights proven to involve document forgery. The research was conducted through library research, with the object of study consisting of legal provisions concerning inheritance law, document



forgery, and civil liability. This study was not carried out in a specific location, as it is oriented toward a normative examination of legal materials. The subjects or targets of the research are directed toward the legal standing of heirs as legal subjects, as well as parties involved in the issuance of a Certificate of Inheritance Rights based on documents proven to be falsified.

The approaches employed include the statutory approach and the case approach through an examination of the Civil Code, the Criminal Code, the Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency Number 16 of 2021, and the Supreme Court Decision Number 1470 K/Pid/2023. The research instruments consist of primary, secondary, and tertiary legal materials obtained through legal material tracing techniques and library studies of statutory regulations, books, journals, articles, and previous research. Subsequently, the collected legal materials were analyzed qualitatively using legal interpretation methods, particularly grammatical interpretation and systematic interpretation, in order to obtain a comprehensive understanding of the civil rights of heirs and the forms of civil liability arising from the use of a Certificate of Inheritance Rights prepared on the basis of forged documents.

3. RESULTS AND DISCUSSION

Civil Rights of an Individual in a Certificate of Inheritance Rights Proven to Involve Document Forgery.

The research findings indicate that the dispute in Decision Number 1470 K/Pid/2023 originated from the use of a family lineage document containing false information as the basis for the issuance of a Certificate of Inheritance Rights. In this case, the defendant was proven to have inserted false information into the document, which was subsequently used to obtain legitimacy as an heir. This legal fact demonstrates that the forgery did not merely occur at the administrative level but also targeted the substantive aspect of inheritance legal relations, specifically determining who is legally entitled to the deceased's estate. The Supreme Court's decision, which overturned the previous judgment and declared the defendant guilty, reflects judicial recognition of the element of material falsity in the documents used (Fikricinta et al., 2021).

Fundamentally, the Certificate of Inheritance Rights occupies a strategic position in civil law because it functions as evidence of the identity of heirs and serves as the legal basis for various legal acts, including inheritance distribution, banking administration, and the transfer of land rights. Therefore, the Certificate of Inheritance Rights is not merely an administrative document but also a legal legitimization instrument that determines recognition of an individual's status as an heir. Within the context of this research, the use of forged documents to obtain a Certificate of



Inheritance Rights has undermined this legitimizing function and generated legal uncertainty for parties who are legitimately entitled to inheritance rights (Bagaswara & Prananingtyas, 2023).

Based on the analyzed facts, the document forgery in the a quo case was carried out by omitting or excluding lawful heirs from the family lineage record. Such conduct produced a legal construction inconsistent with the actual circumstances and directly eliminated the juridical legitimacy of rightful heirs. These findings demonstrate that the violation extended beyond merely inserting false information and resulted in the denial of the existence of legal subjects who, normatively, possessed inheritance rights from the moment succession commenced. Accordingly, the research data reveal that family lineage forgery became an instrument for depriving civil rights through an administrative mechanism that appeared formally valid but was materially defective.

From the perspective of civil law, civil rights are rights inherently attached to every legal subject to own, control, and protect their interests in legal relations with others. The right to inherit falls within the category of civil rights that arise automatically under inheritance law. Such recognition is consistent with Articles 1 to 3 of the Indonesian Civil Code, which affirm that every person is recognized as a legal subject and may not arbitrarily lose their civil rights. Consequently, the omission of lawful heirs from a Certificate of Inheritance Rights constitutes a violation of the fundamental principle of recognition of civil rights itself (Neni & Hidayati, 2020).

The findings further demonstrate that although an heir's name may not be included in the SKHW, inheritance rights do not automatically cease to exist. Inheritance rights fundamentally arise from the legal relationship between the heir and the deceased, rather than solely from the existence of an administrative document. Accordingly, the Certificate of Inheritance Rights merely functions as an evidentiary instrument and not as the primary source of inheritance rights. This understanding is significant because, in practice, society often treats the Certificate of Inheritance Rights as though it were the sole determinant of inheritance rights, whereas legally the existence of heirs remains recognized insofar as it can be established through legitimate family relations and relevant legal grounds (Subekti, 2005).

An analysis of Decision Number 1470 K/Pid/2023 demonstrates that the defendant's actions fulfilled the characteristics of providing false information in an authentic deed as contemplated under criminal law. However, the most significant consequences emerged within the civil law dimension, namely the loss of entitlement to an inheritance share, non-recognition of heir status, and restricted access to the deceased's estate. This condition illustrates the close interrelationship between criminal and civil dimensions in inheritance disputes involving document forgery. While criminal punishment of the offender is essential, it does not automatically restore the victim's civil rights.



Viewed through the theory of legal protection, these facts indicate a failure of preventive legal protection in the process of issuing the Certificate of Inheritance Rights. Ideally, verification of heirs' identities and examination of supporting documents by authorized officials, including notaries, should prevent the use of false information. Procedures involving the examination of birth certificates, family cards, marriage certificates, and death certificates serve as mechanisms to ensure the validity of the legal relationship between the deceased and the heirs. When such procedures are inadequately implemented or manipulated through forged documents, the risk of producing a Certificate of Inheritance Rights with legal defects becomes significantly heightened (Virginia Sekar Rizky & Flora Dianti, 2022).

Furthermore, legal protection theory explains that protection is not solely preventive but also repressive in nature. In this case, repressive protection was manifested through criminal proceedings culminating in a cassation decision by the Supreme Court. However, the findings reveal that the criminal judgment did not automatically invalidate the Certificate of Inheritance Rights nor restore the legal position of the aggrieved heirs. Therefore, effective legal protection requires additional measures in the form of civil litigation aimed at annulling the legally defective a Certificate of Inheritance Rights and restoring the rights that have been unlawfully deprived. This view is consistent with previous studies recognizing civil claims based on Article 1365 of the Indonesian Civil Code as a mechanism of protection for victims of forged document usage (Wijaya et al., 2023).

The losses suffered by lawful heirs in such cases are not confined to material damages, such as deprivation of inheritance shares and economic benefits derived from the deceased's estate, but also encompass immaterial damages. Family conflict, reputational harm, psychological suffering, and a sense of injustice constitute consequences that cannot be disregarded. These circumstances explain why inheritance disputes arising from document forgery frequently develop into prolonged conflicts. Within legal protection theory, such losses provide the basis for state legitimacy to establish fair and effective mechanisms of legal recovery (Satjipto Rahardjo, 2000).

Based on the overall analysis, this study confirms that document forgery in the issuance of a Certificate of Inheritance Rights constitutes a serious violation of the civil rights of lawful heirs. The facts established in Decision Number 1470 K/Pid/2023 demonstrate that forgery not only threatens the validity of legal documents but also creates legal uncertainty and disrupts the balance of familial and inheritance relationships. Therefore, legal protection for heirs cannot end with the criminal punishment of offenders alone but must also be realized through the reaffirmation of heir status, annulment of legally defective documents, and restoration of the resulting rights and losses.



In this manner, the objectives of law justice, legal certainty, and utility may be substantively achieved.

Forms of Civil Liability That May Be Imposed Upon the Legitimate Heirs as a Consequence of a Certificate of Inheritance Rights Prepared on the Basis of Forged Documents.

The existence of a Certificate of Inheritance Rights occupies a highly strategic position in civil law practice, as this document serves as the basis of legitimacy for heirs to undertake various legal actions concerning the deceased's estate, including the transfer of land rights, disbursement of bank funds, and administration of other assets. In Decision Number 1470 K/Pid/2023, which constitutes the focus of this research, it was established that forged family genealogy documents had been used as the basis for the issuance of a Certificate of Inheritance Rights. Such forgery resulted in an individual who was not legally an heir being listed as the sole heir, thereby excluding the position of the legitimate heirs. This fact demonstrates that the Certificate of Inheritance Rights, which should function to provide legal certainty, instead becomes an instrument generating legal uncertainty and disputes when prepared based on inaccurate information. This condition highlights the importance of accuracy and verification in the preparation process of a Certificate of Inheritance Rights by authorized officials (Rezanda & Paramita, 2023).

From the perspective of civil law, the forgery of documents used in the preparation of a Certificate of Inheritance Rights cannot merely be regarded as an administrative violation, but rather constitutes an act that directly infringes upon an individual's civil rights. Civil rights, as fundamental rights of legal subjects, are guaranteed under Articles 1, 2, and 3 of the Indonesian Civil Code, which affirm the recognition of every person's civil rights without the existence of civil death. In inheritance law, these rights manifest in the entitlement to inherit based on a legal relationship with the deceased. Therefore, when family genealogy documents are falsified and the existence of legitimate heirs is deliberately omitted, the violation concerns not merely administrative formalities but also the civil rights inherently attached to those heirs. This circumstance is evident in the case under study, where the perpetrator constructed a legal narrative inconsistent with reality in order to obtain benefits over the inherited property.

The forgery occurring in this case illustrates that irregularities in the preparation of a Certificate of Inheritance Rights may arise in various forms, including falsification of heirs' identities, forgery of supporting documents, falsification of statements, and forgery of signatures or approvals of heirs. In Decision Number 1470 K/Pid/2023, the dominant form of misconduct involved the use of a forged family genealogy to obtain legal legitimacy over inheritance status. The defendant presented genealogical data inconsistent with factual circumstances, resulting in an erroneous inheritance declaration deed and conferring legal status as heir upon an unauthorized



party. Such practices demonstrate that weak document verification procedures and the reliance of deed-making officials on formally submitted information may create opportunities for legal abuse (Virginia Sekar Rizky & Flora Dianti, 2022).

Through Decision Number 1470 K/Pid/2023, the Supreme Court ultimately declared that the defendant had been lawfully and convincingly proven guilty of ordering the insertion of false information into an authentic deed and imposed a sentence of one year imprisonment. This decision carries significant legal meaning because it judicially confirms that the documents used as the basis for issuing the Certificate of Inheritance Rights indeed contained elements of forgery. Accordingly, this legal fact, having obtained permanent legal force (*inkracht*), provides a strong basis for establishing the violation of the legitimate heirs' rights. The criminal judgment also demonstrates that criminal law functions as a repressive instrument against perpetrators, yet does not automatically resolve the issue of restoring the victims' civil rights.

From the perspective of legal protection theory, this condition indicates the necessity for legal protection that is not only repressive through criminal punishment but also restorative through the restoration of victims' rights. According to the legal protection concept developed by Philipus M. Hadjon, legal protection is fundamentally intended to guarantee the rights of legal subjects whose rights have been violated. In this case, the legitimate heirs suffered losses because their inheritance rights could not be exercised due to the existence of a forged Certificate of Inheritance Rights. Therefore, legal protection cannot be adequately achieved solely through punishing the offender but must also be accompanied by legal measures aimed at restoring the actual status and rights of the legitimate heirs (Vivi Carolin Wijaya et al., 2023).

The forgery of a Certificate of Inheritance Rights examined in this research also fulfills the characteristics of an unlawful act (*onrechtmatige daad*) as regulated under Article 1365 of the Indonesian Civil Code. The first element, namely the existence of an act, is evident from the perpetrator's active conduct in falsifying the family genealogy for the Certificate of Inheritance Rights application. The second element, namely the existence of damages, is reflected in the deprivation of legitimate heirs' rights and the substantial material losses incurred. The third element, namely unlawfulness, is satisfied because the conduct contravened the law, violated the rights of others, and conflicted with the principles of propriety and honesty. Meanwhile, the causal relationship is clearly established because the victims' losses arose directly from the use of forged documents in the Certificate of Inheritance Rights issuance process. Since all these elements are fulfilled, the perpetrator bears not only criminal liability but also civil liability (Syaiful Badri et al., 2024).

The validity of a Certificate of Inheritance Rights issued based on forged documents also constitutes a fundamental issue in this case. In principle, a deed or document originating from false statements loses its legal legitimacy because it contradicts the requirements for the validity of legal acts. Article 1869 of the Indonesian Civil Code stipulates that a deed defective due to an unauthorized or incompetent official, or due to formal defects, no longer possesses the evidentiary force of an authentic deed. In the context of the present case, the legal defect arose not solely from notarial error but from the falsified substance of the supporting documents. Consequently, the Certificate of Inheritance Rights may be challenged and annulled through judicial proceedings, and all legal actions derived from it, including transfers of land rights, may in principle be declared invalid (Nikita Fikricinta et al., 2021).

The primary form of civil liability toward legitimate heirs in cases of this nature is realized through compensation mechanisms. Under civil law, compensation constitutes the juridical consequence of an unlawful act causing harm to another party. Such damages encompass both material and immaterial losses. Material losses may include deprivation of inheritance shares, reduction in asset value due to transfers to unauthorized parties, and litigation and legal service expenses incurred by victims in pursuing their rights. Immaterial losses include psychological suffering, loss of the sense of justice, and disruption of familial relationships caused by prolonged inheritance disputes. Accordingly, compensation claims serve as an important legal instrument in restoring the victims' position to the condition existing prior to the violation (Syaiful Badri et al., 2024).

Furthermore, the research findings demonstrate that although criminal sanctions have been imposed, protection for legitimate heirs remains incomplete if the Certificate of Inheritance Rights and its derivative documents have not been annulled. In practice, certificates of land ownership and other administrative documents issued based on a forged Certificate of Inheritance Rights often remain registered in the perpetrator's name until a civil court decision invalidates them. This condition explains why victims must still pursue civil litigation even after the offender has been criminally convicted. Such circumstances reveal a functional separation between criminal law, which focuses on punishment, and civil law, which emphasizes the restoration of rights, thereby necessitating that both mechanisms operate complementarily (Adtlah Almuntas et al., 2024).

Ultimately, the discussion of Decision Number 1470 K/Pid/2023 demonstrates that the forgery of a Certificate of Inheritance Rights generates extensive legal implications, including violations of civil rights, defects in document validity, criminal and civil liability, and the necessity for comprehensive legal protection of legitimate heirs. The ultimate objective in resolving disputes of this nature is to realize the principle of *restitutio in integrum*, namely restoring the legal and



social condition of victims to the state existing prior to the violation. This principle may be achieved through the annulment of the forged Certificate of Inheritance Rights, restoration of inherited property, reaffirmation of the status of legitimate heirs, and the provision of proportional compensation. Thus, the law functions not merely to punish offenders but also to ensure the realization of substantive justice for injured parties.

4. CONCLUSION

Document forgery in the preparation of a Certificate of Inheritance Rights, as reflected in Decision Number 1470 K/Pid/2023, constitutes a serious violation of the civil rights of lawful heirs. The falsification of a family genealogy that omits or negates the existence of legitimate heirs not only creates administrative defects but also substantively undermines the legitimacy of inheritance legal relations and deprives legally entitled persons of recognition as subjects of law with rights to the deceased's estate. This research confirms that inheritance rights arise from a legal relationship with the deceased and do not solely depend upon the existence of a Certificate of Inheritance Rights. Consequently, the exclusion of lawful heirs from a Certificate of Inheritance Rights does not extinguish inheritance rights that have normatively attached to them. Nevertheless, the existence of a forged Certificate of Inheritance Rights produces tangible consequences, including restricted access to inheritance, denial of recognition of heirship status, and the emergence of both material and immaterial losses suffered by the aggrieved parties. From the perspective of legal protection, a criminal judgment convicting the perpetrator constitutes a form of repressive legal protection; however, such protection remains insufficient to comprehensively restore the victim's rights. Therefore, further measures are required, including strengthening document verification mechanisms by authorized officials during the Certificate of Inheritance Rights issuance process and pursuing civil legal remedies to annul legally defective documents and restore the status of lawful heirs, thereby ensuring that the objectives of law justice, legal certainty, and legal utility are substantively realized.

The form of liability owed to lawful heirs arising from a Certificate of Inheritance Rights prepared on the basis of forged documents cannot be fulfilled solely through the criminal punishment of the perpetrator but must also be comprehensively implemented through mechanisms of civil liability. Decision Number 1470 K/Pid/2023 demonstrates the use of forged family genealogy documents that generated erroneous legal legitimacy and caused harm to lawful heirs. Such conduct fulfills the elements of an unlawful act as regulated under Article 1365 of the Indonesian Civil Code, namely the existence of an unlawful act, loss or damage, causal relationship, and fault, all of which give rise to legal responsibility on the part of the perpetrator.



Consequently, injured heirs are entitled to seek the annulment of the Certificate of Inheritance Rights and its derivative documents, restitution of inherited property, re-recognition of their status as heirs, and compensation for both material and immaterial losses incurred. This research further demonstrates that a final and binding criminal judgment does not automatically invalidate the Certificate of Inheritance Rights or restore the victim's rights, rendering settlement through civil litigation an inseparable necessity. Accordingly, future measures require harmonization between criminal and civil legal mechanisms, as well as the strengthening of supervisory and verification systems in the issuance of Certificate of Inheritance Rights, so that protection for lawful heirs is not merely repressive in nature but also restorative through the restoration of conditions to their state prior to the violation (*restitutio in integrum*).

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