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Application of the Plantation Law in Cases of Occupation of Cultivation Rights Land: Case Study of the Occupation of Cultivation Rights Land No.34 of 1999 Belonging to PT.SPS

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Abstract

This research aims to analyze how the implementation of Law No. 39 of 2014 concerning Plantations (hereinafter referred to as the Plantation Law) As amended by Law No. 6 of 2023 concerning the Determination of Government Regulations in Lieu of Law No. 2 of 2022 concerning Job Creation into Law in cases of land grabbing with HGU status . This is intended so that in future cases of land grabbing on other parties' land (especially if the land is

already certified) we can know which provisions must be applied. so that it is easier to prove and the principle of simple, fast justice and low costs can be realized as expected. This is important because in some cases the criminal act of land grabbing is quite difficult to apply the law, so that the defendant is acquitted or free from all legal charges.

Keywords: Land Grabbing, Confiscation of Cultivation Rights (HGU), Plantations

Introduction

The issue of Cultivation Rights (HGU) in Law No. 5 of 1960 concerning Basic Agrarian Principles Regulations (which is usually called the Basic Agrarian Law and abbreviated as UUPA), is regulated in Articles 28 to Article 34 of the UUPA. The granting of HGU according to Article 28 and Article 29 of the UUPA is intended for businesses in the fields of agriculture, animal husbandry or fisheries. Then the period for which HGU is granted is 25 years or 35 years and is granted on state land, namely on land that is directly controlled by the State. Furthermore, the HGU period can still be extended if the right holder still requires a period of 25 years. Regarding the size of the HGU that can be granted according to Article 28 (2) UUPA, it is a minimum of 5 (five) hectares,¹ so it is not possible if the HGU is granted for less than 5 (five) hectares.

HGU is one of the land rights that must be registered and in Government Regulation (PP) no. 24 of 1997 concerning Land Registration is included as one of the objects of land registration, in addition to other land rights. Land registration itself is intended to provide legal certainty and certainty of land rights (HGU) as well as to provide legal protection for HGU holders.

The implementation of land registration according to Article 19 (2) UUPA includes measuring, mapping and bookkeeping, registration of rights and transfer of rights as well as providing evidence of rights in the form of a certificate of title known as a certificate. Thus, a certificate is proof of rights that can be used by land rights holders (HGU holders) to prove that they are the holder of the HGU in question. Because the HGU certificate is made by an authorized official in accordance with applicable laws, the certificate is an authentic deed which acts as perfect evidence to prove that the holder of the certificate is the one who has the rights to the HGU in question. This is what is called legal certainty and legal protection given to land rights holders which is a mandate from the UUPA and PP No. 24 of 1997.²

¹ Mazwar, *et al.*, Position of Physical Land Tenure Certificate (Sporadic) Above Cultivation Rights, *International Journal of Advanced Multidisciplinary Research and Studies*, 2024; 4(3): 1670-1674.

² Della Rafiqqa Utari, Suhaimi, Pendaftaran Tanah Yang Dikuasai Oleh Tempat-Tempat Ibadah Umat Islam Di Kecamatan Kuta Alam Banda Aceh, *Syiah Kuala Law Journal*, 2020; 4(3): 310-322.

Based on this description, it can be explained that as long as the HGU holder controls the land and the HGU holder has a certificate of proof of control, then during that time the HGU holder is the right holder of the HGU (in the sense that as long as the control is within the period stated in the certificate and has never been transferred to other third parties, then the other party does not have any rights to the HGU land. And this is a concrete form of legal protection for land rights holders as referred to in UUPA and PP No. 24 of 1997. Likewise for the rights holders who concerned has obtained legal certainty in the control of the HGU in question.

Even though in principle the HGU certificate holder is the party entitled to the HGU in question, where the HGU has not been and has never been transferred to another party, in practice it is still common for other parties to control the HGU land. There are various reasons and backgrounds for this control, some say that the land is the right to cultivate (arable land)³ in question. Then there are those who say that the land was inherited from their parents and there are also those who state that the person concerned controls the land on the basis of a Statement of Physical Control over a plot of land (Sporadic Letter).

One of the following examples shows the control of other parties over HGU land based on the Sporadic Letter, namely HGU land belonging to PT Surya Panen Subur (PT.SPS) 2, which is located in Pulo Kruet Village, Darul Makmur District, Nagan Raya Regency. In this case PT.SPS 2 controls the land based on its rights HGU No.34 of 1999, then there is another party named IH who since October 2022 has controlled the land by clearing and planting oil palm trees and building huts on the land.

IH's action of cleaning and planting oil palm trees and building huts on the land is one of IH's ways of controlling HGU land belonging to PT.SPS 2, supported by a Sporadic Letter signed by the Village Head (Keuchik) Kayee Unoe, Darul Makmur District, Nagan Regency Raya. Even though the land is an HGU owned by PT. SPS 2 and has been registered at the Land Office and has a Certificate with HGU Certificate No. 34 of 1999. Meanwhile, IH controlled the land on the basis of the Sporadic Letter dated 14 August 2012, so long before the Sporadic Letter existed, PT. SPS 2 had controlled the land since 1997 with the 1999 HGU certificate No. 34 dated 19 April 1999.

The grabbing of HGU land (land) belonging to PT.SPS 2 by IH's brother is an unlawful act and is included in the criminal act of land grabbing as regulated in: Article 385 1st of the Criminal Code (KUHP). The criminal act of land grabbing is an act of seizing or controlling someone else's land against their rights or illegally.⁴ Apart from that, if we look at Law no. 39 of 2014 concerning Plantations (hereinafter referred to as the Plantation Law) As amended by Law No.6 of 2023 concerning the Determination of Government Regulations in Lieu of Law No.2 of 2022 concerning Job Creation into Law, land grabbing is included in plantation crimes as regulated in Article 107 letter a of the Plantation Law. So the Public Prosecutor in his indictment charged defendant IH with an alternative charge, namely the

first alternative as regulated in Article 107 letter a of the Plantation Law, in which case defendant IH is threatened with a maximum prison sentence of 4 years or a maximum fine of Rp. 4,000,000,000,- Meanwhile, Article 385 1 of the Criminal Code also carries a maximum prison sentence of 4 years.

From the description above, it is interesting to study in depth how the Plantation Law is applied in cases of land grabbing with HGU status. This is intended so that in future cases of land grabbing on other parties' land (especially if the land is already certified) we can know which provisions must be applied. so that proof is easier and the principles of simple, fast justice and low costs can be realized as expected by Law No. 48 of 2009 concerning Judicial Power.⁵

Research Methods

This research is normative legal research or also known as doctrinal legal research. This type of research is used because the main data from this research is in the form of documents, namely the Suka Makmue District Court Decision Number 7/Pid. Sus/2024/PN-Skm. To support the discussion, other documentation studies are added in the form of textbooks, journals, reports, applicable laws and regulations and so on. All of these documents are primary data from this research and are also supported by secondary and tertiary data that are directly and indirectly related to this research. Next, the data is processed and presented qualitatively and analyzed prescriptively.

Results and Discussion

1. Position Case

The defendant in the case of usurping HGU land belonging to PT.SPS 2 was named IB bin Alm. TB, place and date of birth is Alue Jampak on January 15 1997, resides in Alue Jampak Village, Darul Makmur District, Nagan Raya, religion is Islam and occupation is Farmer/Grower. The chronology of the defendant carrying out the action of grabbing HGU land belonging to PT.SPS 2 is as follows:

- a. That the defendant IH bin Alm. TB since October 2022 until now has been located in Pulo Kruet Village, Darul Makmur District, Nagan Raya Regency, precisely on HGU No. 34 of 1999 belonging to PT.SPS 2 or at least in a place that falls within the jurisdiction of the Suka Makmue District Court which has the authority to examine and adjudicate this case, illegally working on, using, occupying and/or controlling plantation land. This act was carried out by the defendant when witness Dhery Amanda together with witness Anis Ali, witness Suardi and other colleagues who were employees of PT. .SPS 2 whose aims and objectives are unknown. Then in January 2023, after completing the opening of the road to the plasma site, witness Dhery Amanda together with witness Anis Ali, witness Suardi and other colleagues found out that defendant IH had been working without permission from PT.SPS 2.

⁵ Ikhbal Gusri, Optimalisasi Asas Peradilan Cepat, Sederhana, dan Biaya Ringan Dengan Mekanisme Pemanggilan Melalui Surat Tercatat, <https://badilag.mahkamahagung.go.id/artikel/publikasi/artikel/optimalisasi-asas-peradilan-cepat-sederhana-dan-biaya-ringan-dengan-mekanisme-pemanggilan-melalui-surat-tercatat-oleh-ikhbal-gusri-s-h-20-7>.

³ Mazwar, *et al.*, *Op. Cit.*

⁴ Zainudin Hasan, *et al.*, Penegakkan Hukum Terhadap Tindak Pidana Penyerobotan Tanah Di Kabupaten Tanggamus Lampung, *Jurnal Review Pendidikan dan Pengajaran*, 2024; 7(2): 4277-4285.

- b. That then witness Dhery Amanda together with witness Suardi in March 2023 met defendant IH at the location of the HGU land belonging to PT. SPS 2, where at that time the defendant was working on the land. Next, witness Suardi together with witness Dhery Amanda asked the defendant "on what basis did brother IH work on the land?" then defendant IH showed photocopies of 20 (twenty) sporadic letters, one of the letters was in the name of IH, signed by the Head of Kaye Unoe Village. (Jamal AR) in 2012. Seeing this, witness Suardi together with witness Dhery Amanda explained to the defendant that the land being worked on by defendant IH was HGU land belonging to PT.SPS 2 but the defendant continued to cultivate it.
- c. A. That defendant IH illegally worked on or controlled plantation land which belonged to PT. SPS 2 is around 5 (five) hectares where on the land there is proof of ownership of HGU Certificate No. 34 of 1999 from PT.SPS 2 while the defendant does not have proof of legal land ownership in accordance with statutory regulations.
- d. Whereas Muhammad Jamal, as the head of Kayee Unoe Village for the period 2007 to 2014, admitted that he had never issued a statement of physical possession of land parcels (sporadic) for defendant IH and during his tenure as Village Head, witness Muhammad Jamal only issued sporadic statements in 2010 for residents. in 4 (four) villages, namely Kayee Unoe Village, Gelanggang Gajah Village, Puloe Kruet Village and Kuta Trieng Village, the four villages are included in the Makmue Mulia farmer group, while defendant IH is not included in the Makmue Mulia farmer group.
- e. That based on the minutes of field identification No.205/BAIL/11.15/VII/2023 on Thursday 6 July 2023 issued by the Ministry of Agrarian Affairs and Spatial Planning/National Land Agency of the Nagan Raya Regency Land Office which was signed by the Head of the Nagan Raya Regency Land Office on name Shafwan, S.H. explained the results of field identification of PT.SPS 2 No. HGU land. 34 of 1999 which alleged land grabbing activities that occurred in Pulo Krut Village, Darul Makmur District, were as follows: (1) That the location of the land plot designated by the party present at the activity was in the HGU No. 34; (2) The area of the identification results indicated by the parties present is 180,000 m² or 18 Ha; (3) That the description of the Overlay results between HGU No. 34 with the identification results expressed in the form of a situation map.
- f. That the defendant's actions are as regulated and punishable by crime in Article 385 1 of the Criminal Code with a maximum penalty of 4 years in prison. Apart from that, it also violates Article 107 letter a of the Plantation Law which carries a maximum penalty of 4 years or a maximum fine of IDR 4,000,000,000.

From the description above, it can be seen that Defendant IH has deliberately taken over the HGU land belonging to PT. under the control of another party, namely HGU No. 34 of 1999 belonging to PT.SPS 2. The defendant took over HGU land No. 34 of 1999 belongs to PT. SPS 2 on the grounds that he has the right to work on it because the land is his land by submitting evidence of the Sporadic Letter dated 14 August 2012 which was signed by the Village Head (Keuchik) of Gampong Kayee Unoe, Darul Makmur

District, Nagan Regency Raya. Even though the land is an HGU owned by PT. SPS 2 and has been registered at the Land Office and has a Certificate with HGU Certificate No. 34 of 1999. Meanwhile IH controlled the land long before the Sporadic Letter came into existence. PT. SPS 2 has controlled the land since 1997 with the 1999 HGU certificate No. 34 dated 19 April 1999.

2. Application of the Plantation Law in Cases of Confiscation of Cultivation Rights Land

As explained previously, PT. SPS 2 has controlled the HGU land located in Pulo Kruet Village, Darul Makmur District, Nagan Raya Regency since 1997. And the HGU has been registered with the National Land Agency (BPN) with certificate No. 34 of 1999 on 19 April 1999. Then from October 2022 until now, precisely on HGU land No. 34 of 1999 belonging to PT.SPS 2 or at least in a place that falls within the jurisdiction of the Suka Makmue District Court which has the authority to examine and adjudicate this case, IH bin the late TB illegally worked on, used, occupied and/or controlled the land The plantation which has HGU status belongs to PT.SPS 2. The defendant carried out these actions by working on, occupying, cultivating and controlling by planting oil palm plants on the HGU land.

As a result of the actions of the defendant IH in grabbing the HGU land belonging to PT. SPS 2, the defendant IH was finally arrested by the police and accused of having committed the act of grabbing the land. The Police action was to arrest Defendant IH because PT.SPS objected to Defendant IH's action of taking over his HGU land, and asked the Police to process it in accordance with applicable legal regulations.⁶ Apart from that, legally PT. SPS also has the right to file a lawsuit for compensation based on a civil lawsuit to the District Court based on Article 1365 of the Civil Code.⁷

Then, after carrying out an investigation, it was concluded that it was true that HGU land no. 23 of 1999 belonging to PT.SPS 2 by Defendant IH. So investigators processed the case until it was completed and then handed it over to the Public Prosecutor to be submitted to the Suka Makmue District Court, Nagan Raya Regency. In this case, the Public Prosecutor in his lawsuit asked the Panel of Judges at the Suka Makmue District Court, who examined the funds to try the case, to decide:

- State that the defendant IH bin Alm. TB was legally and convincingly proven guilty of committing a criminal act of illegally controlling plantation land as referred to in the first alternative indictment of the Public Prosecutor;
- Sentenced the defendant IH bin Alm TB to prison for 1 (one) year with the order that the defendant be immediately detained;
- Declare evidence in the form of minutes of field identification results No.210/BAIL/11.15/V/2024 dated 21 May 2024, signed by Rinaldi Djauhari, S.H. as head of the survey and mapping section (along with its attachments).

⁶ Laporan Polisi Nomor: LP/B/18/III/2023/SPKT/POLRES NAGAN RAYA/POLDA ACEH/Tanggal 13 Maret 2023.

⁷ Emir Dhia Isad (Konsultan Hukum ILS Law Firm), Langkah Hukum Penyerobotan Tanah Milik Orang Lain, ILS Law Firm, 13 November 2023, <https://www.ilslawfirm.co.id/langkah-hukum-penyerobotan-tanah-milik-orang-lain/>, diakses tanggal 17 Juli 2024.

d. Determine that the defendant pay court costs in the amount of Rp. 3,000,- (three thousand rupiah).

The first alternative charge of the public prosecutor is violating Article 107 letter a of Law No. 39 of 2014 concerning Plantations as amended by Law No. 6 of 2023 concerning the Determination of Government Regulations in Lieu of Law No. 2 of 2022 concerning Job Creation become law. In other words, in short, it can be said that the Defendant's actions violated Article 107 letter a of the Plantation Law.

The judge who examined and tried the case, after hearing the public prosecutor's indictment, statements from witnesses, expert statements, statements from the defendant and evidence in the form of Minutes of field identification results No.210/BAIL/11.15/V/2024 dated 21 May 2024 which was signed by Rinaldi Djauhari, S.H. as head of the survey and mapping section of the Nagan Raya Land Office, as well as a field hearing (descente) on May 20 2024 involving experts from BPN, finally gave the following considerations:⁸

- a. that the Defendant has been charged by the Public Prosecutor with alternative charges, so that the Panel of Judges, taking into account the legal facts, directly chooses the first alternative charge as regulated in Article 107 letter a of the Plantation Law, the elements of which are as follows: (1) Each person; (2) Illegally working on, using, occupying and/or controlling plantation land.
- b. that regarding these elements the Panel of Judges considers the following: (1) Every Person Considers that based on article 1 point 15 of the Plantation Law, it is explained that every person is an individual or corporation, whether a legal entity or not a legal entity. The element "everyone" here refers to the subject of criminal law, where every person is an individual and/or corporation which refers to the legal subject who commits a criminal act, namely every person without exception who is physically and mentally healthy, and has the skills and understands what carried out, so that they can be seen to be held legally accountable. In this case, the Public Prosecutor confronted the Defendant IH bin Alm TB, and after being asked about his identity, which was also confirmed by the witnesses, it turned out to be the same as that stated in the indictment, so the Defendant was the person referred to in the indictment and there was no error. in person), and during the trial the Defendant was able to follow and answer questions well, so that the Panel of Judges concluded that the Defendant was in good health and could be held accountable for the actions he committed, thus the Panel of Judges was of the opinion that the "every person" element had been fulfilled according to the law.
- c. That the element is illegally working, using, occupying and/or controlling plantation land, is proven by 3 (three) questions which must be answered in accordance with the facts revealed at trial, namely: (1) Whether the Defendant is working, using, occupying and/or controlling the land and (2) Whether the land being worked on, used, occupied and/or controlled is

Plantation land and (3) Whether the act of working on, using, occupying and/or controlling the Plantation land is carried out illegally or otherwise.

- d. that the act of carrying out, using, occupying and/or controlling this element consists of several acts whose nature of proof is alternative so that, if only one of these acts has been proven, then this element is deemed to have been proven according to law, and the other elements no need to prove it anymore. Thus, based on the facts revealed at trial, it is known that the defendant IH bin Alm TB has been cultivating without permission the HGU land belonging to PT. SPS 2 by means of the defendant cleaning and planting oil palm trees and building a hut. So, according to the facts of the trial from the statements of witnesses both presented by the Public Prosecutor and the de charge witnesses presented by the Defendant, the Defendant's statement at trial was in essence that it was true that the Defendant was working on, using, occupying and/or controlling land covering an area of approximately 4 (four) hectares located in Pulo Krut Village, Darul Makmur District, Kab. Nagan Raya.
- e. that based on the facts at trial it was discovered that it was true that the defendant was working on, using, occupying and/or controlling land covering an area of approximately 4 (four) hectares located in Pulo Krut Village, Darul Makmur District, Kab. Nagan Raya. Next, it is considered whether the land being worked on, used, occupied and/or controlled is Plantation land or not; Considering, that based on article 1 point 7 of the Plantation Law, it is explained that plantation land is a plot of land used for plantation businesses. And at the trial it was revealed that the land being worked on by the defendant IH bin Alm TB was HGU land belonging to PT. SPS 2.
- f. that the results of the identification are further strengthened by the official report on the results of the field identification at the time of the Field Session (Descente) on 20 May 2024, which is essentially as follows: Minutes of Field Identification Results No.210/BAIL/11.15/V/2024 which is signed by the Head Survey and Mapping Section at the Nagan Raya Regency Land Office on 21 May 2024 which basically explained that the results of the land identification shown and controlled by Brother IH bin Alm TB were within the 18 Ha identification area within the Cultivation Rights No.34 of 1999 belonging to PT .SPS as stated in the attached situation map along with the coordinate points of the identification land parcel boundary angles (overlay).
- g. that the sporadic letter shown by the Defendant as basic evidence of his control over the land, it is considered that the sporadic letter issued by witness Muhammad Jamal is no longer valid because in 2018 the PT. SPS has paid peunayah/compensation through witness Mazri AB as head of the farmer group; Considering that Witness Muhammad Jamal as Keuchik Gampong Kaye Unoe also denied having signed the Sporadik made by the Defendant IH bin the late TB. Considering, that based on the considerations above, the Panel of Judges is of the opinion that the land worked on, used, occupied and/or controlled by the Defendant is PT.SPS Plantation land.

⁸ Putusan Pengadilan Negeri Suka Makmue No.7/Pid.Sus/2024/PN Skm tanggal 29 Mei 2024.

- h. that the Panel of Judges was of the opinion that the Defendant had committed acts of working on, using, occupying and/or controlling land, which land was Plantation land which was formally located in the HGU No. 34 PT.SPS 2 in Pulo Krue Village, Darul Makmur District, Nagan Raya Regency, by planting oil palm on it where the processing, use, occupation and/or control was carried out illegally, thus the Panel of Judges was of the opinion that the 2nd element above has been fulfilled according to law.
- i. that because all the elements of Article 107 letter a of the Plantation Law have been fulfilled, the Defendant must be declared to have been legally and convincingly proven to have committed the criminal act as charged in the first alternative indictment.
- j. that during the trial no factors were found that revealed justification (*rechtvaardigingsgrond*) and forgiving reasons (*schulduitsluitingsgrond*) which could eliminate the Defendant's guilt, so that the Defendant's guilt could also be proven, therefore the Defendant must be declared capable of taking responsibility for his actions and be sentenced to an appropriate crime. with his actions.
- k. that the imposition of punishment on the Defendant is not merely retaliatory, but is intended so that the Defendant can improve his attitude, behavior and actions in the future after serving the sentence imposed on him. The aggravating circumstance is that the Defendant's actions have harmed PT SPS. Meanwhile, the mitigating circumstances are that the defendant has never been convicted, the defendant behaves politely in court, the defendant has a family that still needs the defendant as head of the family. Because the defendant has been sentenced to a crime, he must also be burdened with paying the court costs.
- l. Pay attention to Article 107 letter a of the Plantation Law and Law no. 8 of 1981 concerning Criminal Procedure Law and other relevant laws and regulations, the Panel of Judges who examined and tried the case finally stated:⁹
- 1) The defendant IH bin AlmTB mentioned above has been legally and convincingly proven guilty of committing the crime of "illegally working on, using, occupying and/or controlling plantation land" as stated in the first alternative indictment;
 - 2) Sentencing the defendant to imprisonment for 6 (six) months;
 - 3) Determine evidence in the form of minutes of field identification results No.210/BAIL/11.15/V/2024 dated 21 May 2024 which was signed by Rinaldi Djauhari, S.H. as head of the survey and mapping section (along with attachments) Attached to the case file.
 - 4) Charge the Defendant to pay court costs in the amount of IDR 3,000.00 (three thousand rupiah).

Thus, it is clear that in cases of land grabbing, the rule that is applied is Article 107 letter a of the Plantation Law. This article is applied because the public prosecutor's indictment contains 2 (two) charges, namely:

- 1) The first charge violates Article 107 letter a of Law No. 39 of 2014 concerning Plantations as amended by Law

no. 6 of 2023 concerning the Stipulation of Government Regulations in Lieu of Law No. 2 of 2022 concerning Job Creation into Law.

- 2) The second charge violates Article 385 1 of the KUHP. Because the charges are alternative (the First Indictment and the Second Indictment), when the First Indictment has been legally and convincingly proven that the defendant is guilty of committing the crime, the Panel of Judges will no longer consider the other alternative indictment, namely the Second Indictment. Thus, in accordance with the First Indictment, the defendant was legally and convincingly proven to have committed a criminal act in the plantation sector, namely "Illegally working on, using, occupying and/or controlling plantation land". It is said that illegally means without rights (violating the law) working on, using, occupying and/or controlling plantation land, because it is known that the plantation land is HGU No. 34 of 1999 belonging to PT.SPS 2.

The indictment is prepared in the form of alternative charges, usually the defendant is charged with committing several criminal acts.¹⁰ So, for the first criminal offense, they are charged with violating the first indictment, the second criminal offense with the second indictment and so on. Thus, the application of the Plantation Law in cases of criminal acts of land grabbing by the Panel of Judges at the Suka Makmue Court, Nagan Raya Regency is correct and in accordance with applicable regulations.

Conclusion

In the case of land grabbing of HGU No. 34 of 1999 belonging to PT. SPS The Public Prosecutor prepared his indictment alternatively (First Indictment and Second Indictment). So the Panel of Judges in their evidence considered that if the First Charge had been proven legally and convincingly that the defendant was guilty of committing the crime, then the Panel of Judges would not consider the other alternative charge, namely the Second Charge. Thus, in accordance with the First Indictment, the defendant was legally and convincingly proven to have committed a criminal act in the plantation sector, namely "Illegally working on, using, occupying and/or controlling plantation land". The indictment is prepared in the form of alternative charges, usually the defendant is charged with committing several criminal acts. So, for the first criminal offense, they are charged with violating the first indictment, the second criminal offense with the second indictment and so on. Thus, the application of the Plantation Law as the first indictment in the criminal case of land grabbing by the Panel of Judges at the Suka Makmue Court, Nagan Raya Regency is correct and appropriate.

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1. Mazwar, *et al.* Position of Physical Land Tenure Certificate (Sporadic) Above Cultivation Rights,

¹⁰ Annisa, Jenis-jenis Surat Dakwaan Dalam Proses Hukum Pidana, Fakultas Hukum UMSU Medan, [⁹ Putusan Pengadilan Negeri Suka Makmue No.7/Pid.Sus/2024/PN Skm tanggal 29 Mei 2024.](https://fahum.umsu.ac.id/jenis-jenis-surat-dakwaan-dalam-proses-hukum-pidana/#:~:text=Dakwaan%20alternatif%20adalah%20dokumen%20dakwaan,relevan%20dengan%20bukti%20yang%20ada, diakses tanggal 29 Juli 2024.</p>
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