

LEGAL FRAMEWORK OF PROPERTY OWNERSHIP FOR FOREIGN CITIZENS IN INDONESIA

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Abstract

Indonesia is rich with abundant natural resources. This wealth invites many foreign investors to come and develop their business in Indonesia. The presence of foreign nationals certainly requires a place to live in order to develop their business sustainably and requires a relatively long period of time. The purpose of this study is to analyze the regulations on property ownership in Indonesia for foreigners and to the best ways of property ownership for the foreigners in relation to increasing the investment in Indonesia. This study employs a normative juridical method to describe and analyze legal issues, facts, and other symptoms related to property ownership for foreigners in Indonesia, including the Job Creation Law and its implementing regulations to obtain a comprehensive understanding. The result of the research is that a notable issue arises from Agrarian Minister Regulation 18/2021, which allows for residential areas exceeding 2,000 m² for foreigners under "certain extraordinary circumstances." This provision is problematic due to its lack of a defined maximum limit, creating a legal vacuum ("empty norm"). This absence of clear restriction is seen as a violation of the principles of nationality and Article 33 of the 1945 Constitution, which prioritizes land for the welfare of Indonesian people. The study also identifies that foreigners often resort to "legal smuggling" practices, specifically nominee arrangements, to circumvent ownership restrictions and acquire *Hak Milik* (Freehold Title). In such arrangements, an Indonesian citizen registers the property title on behalf of a foreigner. However, Article 26 paragraph (2) of Law 5/1960 explicitly states that any direct or indirect transfer of property rights to foreigners is null and void by law. Consequently, if a nominee arrangement is discovered, the land title is cancelled and the land reverts to the State.

1. INTRODUCTION

Housing is one of the basic needs for every individual and plays an important role in the formation of each person's habits and personality.¹ Looking from another perspective, where you live also has a big influence on each individual's survival and shelter. The high role of housing for humans has resulted in an increase in demand for housing in Indonesia. With the very rapid increase in population in Indonesia, this has resulted in a high cycle of demand for housing, either for residential purposes or to be used as a place to increase income, namely by building a business.

On the other hand, the people who stop by in Indonesia are not only Indonesian citizens, but also many foreign nationals (*Warga Negara Asing/WNA*) who live in Indonesia in numbers which are certainly not small. Seeing developments, the number of foreigners living in Indonesia is increasing day by day, in fact the number is fluctuating and increasing. The presence of foreigners in Indonesia is not limited to just tourists visiting to see the natural beauty and culture that Indonesia has. The abundant natural wealth is the main trigger and attraction for foreigners to come to Indonesia through tourism. There are many foreign businesspeople who were originally tourists and are now competing to build residences in Indonesia to build and develop their businesses in this country.²

Seeing these supporting factors, Indonesia is in demand as a destination country that invites many foreign investors from competing countries to expand relations and business activities that they are planning to develop. Therefore, this has a big influence on the high volume of foreigners who stop by in Indonesia to run their business. The demands of current developments and the global market have resulted in all aspects surrounding property ownership rights by foreigners not being sufficiently accommodated by regulations in Indonesia. This is very important to study further in order to create a conducive foundation in terms of procurement

In order to accommodate foreigners who live in this country to own property and with the issuance of Law Number 6 of 2023 on Job Creation (hereinafter referred to as Job Creation Law), it strengthens the foundation regarding regulations which have a legal vacuum because it has changed around 80 laws and there are more than 1,200 Articles that have undergone improvements and adjustments include the areas of immigration and land, of course this relates to property ownership by foreigners.

In the immigration sector, to be precise, Article 105 and Article 106 of the Job Creation Law, one of which changes the destination of foreigners who stop by and/or come to Indonesia. In the Job Creation Law, foreigners are given the opportunity to stay in Indonesia for five or ten years in accordance with the applicable terms and conditions. Furthermore, foreigners are given facilities to extend their residence after fulfilling all conditions for foreigners and their families. This provision is regulated in more depth in Government Regulation Number 48 of 2021 on the Third Amendment to Government Regulation Number 31 of 2013 on Implementing Regulations of Law Number 6 of 2011 on Immigration.

¹ Yuli Heriyanti and Ahmad Zikri, "Pembinaan Dan Pengawasan Pemerintah Terhadap Penyelenggaraan Perumahan Dan Kawasan Permukiman Menurut Undang-Undang No.1 Tahun 2011 Tentang Perumahan Dan Kawasan Permukiman," *Jurnal ArTSip* 1, no. 2 (June 2019): 65, <https://journal.universitaspahlawan.ac.id/index.php/artsip/article/download/951/795>.

² Arsenius, "Pengaturan Kepemilikan Rumah Tempat Tinggal Bagi Warga Negara Asing Di Indonesia dalam Prespektif Hukum Agraria," *Jurnal Hukum Varia Bina Civika*, no. 75 (2009), <https://jurnal.untan.ac.id/index.php/civika/article/view/398>.

To avoid inequality in facilities and residence rights for Indonesian residents, the presence of foreigners as immigrants or foreign investors needs to be clearly regulated by law. Restrictions on area, quantity and time to a certain extent related to property ownership status really need to be paid attention to and regulated in Indonesian regulations so that foreigners have restrictions on stopping by and carrying out business development. Thus, it is felt that it is very necessary to carry out further analysis and study regarding the legal position and legal consequences for foreigners who wish to settle in Indonesia in order to create harmony and equal social balance regarding property ownership between foreigners and Indonesian citizens. With this background, the author wants to review further the legal concept regarding ownership of residence by foreigners. The purpose of this research is to analyze Indonesian regulation of property ownership for foreign citizens and the legal consequences of legal smuggling carried out by foreigners regarding property ownership in Indonesia.

2. METHOD

The research method used in this research is normative juridical method. This method is carried out by analyzing, reviewing and carrying out further comparisons regarding legal concepts, principles and theories and is not limited to the applicable laws and regulations related to this research. The author uses three legal materials to examine the results of this writing, namely primary legal materials (regulations that are closely related to the legal issues discussed), secondary legal materials (materials that provide explanations of primary legal materials, such as legal books including theses, theses, literature related to the legal issues discussed³), and tertiary legal materials (materials that provide guidance on primary legal materials, such as legal dictionaries).

Thus, this research will describe various legal issues and facts and other symptoms related to the ownership of residence for foreigners domiciled in Indonesia based on related laws and regulations including the Job Creation Law and its implementing regulations, then analyze them in order to obtain a complete and comprehensive picture of the problems.

3. RESULTS AND DISCUSSION

3.1 Regulations on Property Ownership in Indonesia for Foreigners

Looking from a business perspective, the presence of foreigners actually provides many benefits for the Indonesian economy. Moreover, most of the foreigners who attended were investors who invested their capital in Indonesia, which really helped increase national economic growth. Seeing the benefits provided by foreigners in Indonesia, the government issued a policy to allow foreigners to have residence in Indonesia. This is in accordance with Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency Regulation Number 13 of 2016 on Procedures for Granting, Relinquishing or Transferring Rights to Ownership of Residential or Residential Houses by Foreigners (hereinafter referred to as Agrarian Minister Regulation 13/2016). Apart from providing security for Indonesian citizens, the aim of regulations regarding residence ownership by

³ Peter Mahmud Marzuki, *Penelitian Hukum* (Jakarta: Prenadamedia Group, 2005), 155.

foreigners domiciled in Indonesia is to make it easier for foreigners to fulfil their needs for housing to support businesses that are being developed in Indonesia.⁴

Property ownership by foreigners in Indonesia has been regulated in many regulations since 1960, including:

a. Law of the Republic of Indonesia Number 5 of 1960 concerning Basic Agrarian Regulations (hereinafter referred to as Law 5/1960)

Article 42 of Law 5/1960 states that the parties who can have the right of use are Indonesian citizens, foreigners domiciled in Indonesia, legal entity established according to Indonesian law and domiciled in Indonesia; and foreign legal entities that have representatives in Indonesia.

Through this article, the author draws the meaning that foreigners can have use rights in the form of land or residence in Indonesia. However, if understood more deeply, foreigners who are given rights are foreigners who are domiciled in Indonesia, and legal entities that are given rights are legal entities established according to Indonesian law and domiciled in Indonesia. So, it can be concluded that the presence of foreigners in Indonesia is based on their position **must** be in Indonesia. Another thing is that if a foreigner uses the land to be used to build a residence, it is land controlled by the State, then, before using the right to use the land, the foreigner must obtain permission from an authorized official, this is in accordance with Article 43 paragraph (1) of Law 5/1960.

b. Agrarian Minister Regulation 13/2016 and Agrarian Minister Regulation 29/2016

Agrarian Ministerial Regulation Number 13/2016 is one of the implementing regulations. After being implemented and further evaluated, this regulation was deemed less than optimal.⁵ Furthermore, the Minister of Agrarian Affairs followed up more firmly and updated the ministerial regulation with Agrarian Minister Regulation 29/2016 with more comprehensive content with the same discussion.⁶ Through Article 3 of Ministerial Regulation ATR 29/2016, it regulates that foreigners domiciled in Indonesia can have rights to land or residence through sale and purchase, grant, exchange or auction.⁷ This regulation was deliberately created by the Indonesian Government to support the investment climate by encouraging and providing easy residence for foreigners domiciled in Indonesia. The presence of foreigners in Indonesia will attract foreign investment to invest in Indonesia and it is hoped that this foreign investment will continue in a sustainable manner.

c. Law Number 6 of 2023 on Job Creation

⁴ I Made Oka Pariawan and Ni Luh Gede Astariyani, "Legalitas Pemilikan Rumah Tempat Tinggal Oleh Orang Asing Yang Berkedudukan Di Indonesia," *Kertha Negara: Journal Ilmu Hukum* 6, no. 5 (November 2018): 1-12, <https://udayanetworking.unud.ac.id/lecturer/publication/1709-ni-luh-gede-astariyani/legalitas-pemilikan-rumah-tempat-tinggal-oleh-orang-asing-yang-berkedudukan-di-indonesia-4656>.

⁵ *Hukum Properti*, "Kepemilikan Rumah Orang Asing," accessed April 8, 2024, <https://hukumproperti.com/>.

⁶ *Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency Regulation Number 13 of 2016 on Procedures for Granting, Relinquishing or Transferring Rights to Ownership of Residential or Residential Houses by Foreigners*.

⁷ Herman Hermit, *Komentar Atas Undang-Undang Rumah Susun* (Bandung: CV Mandar Maju, 2009), 86.

In relation to foreigners' ownership of flats as residences, it is specifically regulated in the Job Creation Law from Article 143 to Article 145 in the fourth section with the title Land. Based on Article 145 of the Job Creation Law, it is stated that foreigners are allowed to own apartment units with Building Use Rights. The author is of the view that this provision could be editorially problematic because of its overlap with Law 5/1960. Law 5/1960 has limited foreigners' ownership of land rights to only include Use Rights and Rental Rights, with foreigners who actually make a profit, do business, work or invest in Indonesia. The provisions of Article 36 paragraph (1) of Law 5/1960 which only determines the subject of building use rights in the form of Indonesian citizens and legal entities established according to Indonesian law and domiciled in Indonesia, this quite clearly has closed the possibility for foreigners to have Right to Build (*Hak Guna Bangunan*/HGB) for all their uses.

d. Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency Regulation Number 18 of 2021 on Procedures for Determining Management Rights and Land Rights (Agrarian Minister Regulation 18/2021)

Article 186 paragraphs (1) and (2) of Agrarian Minister Regulation 18/2021 stipulates that:

- “(1) Ownership of residence by foreigners is granted with the following limitations:
 - a) for landed houses:
 - i. a house in the luxury house category in accordance with the provisions of statutory regulations;
 - ii. 1 (one) piece of land per person/family; and/or
 - iii. The land area is at most 2,000 m² (two thousand square meters);
 - b) for flats in the commercial flat category.
- (2) In terms of having a positive impact on the economy and society, the landed house as intended in paragraph (1) can be given on more than 1 (one) plot of land or an area of more than 2,000 m² (two thousand square meters), with the Minister's permission.”

Further analysis regarding these two articles, the granting of use rights to foreigners with an area exceeding 2,000 m² without determining the maximum limit shows the existence of a legal vacuum. This policy is contrary to the principles of nationality and nationality principles contained in the Law 5/1960 and Article 33 paragraphs (3) and (4) of the 1945 Constitution of the Republic of Indonesia which read:

- “(3) Earth and water and the natural wealth contained therein are controlled by the state and used for the greatest prosperity of the people.
- 4) The national economy is organized based on economic democracy with the principles of togetherness, efficiency, justice, sustainability, environmental insight, independence, and by maintaining a balance of progress and national economic unity.”

In this case, land in Indonesia should be prioritized for the welfare of the people. With this, the author believes that this legal vacuum needs to be regulated in more

detail regarding restrictions on granting use rights to foreigners with an area exceeding 2,000 m². This legal vacuum regarding restrictions on the area of residence for foreigners is not regulated in any regulations so it really needs to be regulated in the future.

3.2 Legal Consequences of Legal Smuggling Committed by Foreigners Regarding Residential Ownership in Indonesia

Legal smuggling is an act that aims to circumvent national law so that the party concerned obtains certain benefits according to his wishes, because for him foreign law applies.⁸ Legal smuggling is a foreign legal rule that is set aside and uses national law to achieve certain goals. In practice, especially when viewed through the eyes of a judge, legal smuggling actually results in the enactment of national law and declares that the smuggled foreign law does not apply.

In regulations in the agrarian sector, it is stipulated that only residents who have the status of Indonesian Citizens (*Warga Negara Indonesia*/WNI) are allowed to control their basic needs for natural resources in Indonesia, this is in accordance with what is mandated in Article 9 paragraph 1 of Law 5/1960. Apart from that, regulations in Indonesia have also been tightened that only Indonesian citizens can have ownership rights to assets located in Indonesia, foreigners only have limited land rights and these rights are granted as long as the foreigner still provides benefits for national economic development. In this case, the possibility of legal smuggling if a foreigner wants to own land with freehold status in Indonesia is very large.

As a policy to address the desire of foreigners to own a house and/or land in Indonesia, the Government has provided facilities through implementing regulations for foreigners related to the ownership of a house or place for foreigners domiciled in Indonesia. However, due to the desire of foreigners to own property for a longer period of time and also for wider use purposes, many practitioners try to commit legal smuggling by carrying out practices that get around existing international regulations and national regulations.

One of the legal smuggling practices is borrowing names or often referred to as nominees. A person who has been entrusted to act as an owner as if the person concerned is the actual owner, even though an agreement has been made between the parties which states otherwise or in theory is known as a simulation agreement as regulated in Article 1873 of the Civil Code which states "Further agreements, which are made in a separate deed, which is contrary to the original deed, only provide evidence between the participating parties, and their heirs or people who receive rights from them, but cannot apply to third parties." However, it should be remembered that Article 26 paragraph (2) of Law 5/1960 has been stipulated that "Every sale and purchase, exchange, gift, gift by will and other acts intended to directly or indirectly transfer property rights to foreigners, to citizens foreigners who, in addition to their Indonesian citizenship, have foreign nationality or belong to a legal entity, except as stipulated by the Government as intended in Article 21 paragraph 2, are invalid by law and their land falls to the State, provided that the rights of other parties encumbering them remain intact. and all payments received by the owner cannot be reclaimed."

⁸ Sudargo Gautama, *Pengantar Hukum Perdata Internasional Indonesia* (Bandung: Badan Pembinaan Hukum Nasional - Binacipta, 2012), 148.

Thus, it is clear that even though it can be done based on Article 1873 of the Civil Code, this still has legal impacts, namely that it is void because the law and the land falls to the State. This is of course very detrimental to foreigners who have spent their funds to invest. On the other hand, the legal position of foreigners can also be questioned by the Indonesian citizen whose name is borrowed. Even though in reality the Indonesian citizen did not spend any money to purchase the land, legally, formally, proof of rights in the form of a certificate is registered in the name of the Indonesian citizen. So that the Indonesian citizen whose name is used is the one who is recognized as the owner/holder of rights to freehold land based on the applicable laws and regulations.

Talking about legal consequences begins with the existence of legal relationships, legal events, and legal objects. According to Soedjono Dirdjosisworo, legal consequences arise because of the existence of legal relationships where in legal relationships there are rights and obligations.⁹ Events or occurrences that can give rise to legal consequences between parties who have a legal relationship, these legal events exist in various legal aspects, both public and private law.¹⁰

One of the legal consequences that arise from actions that use the nominee system is that it is null and void and then the land falls into land that is directly controlled by the state. This is of course very detrimental to foreigners who have spent their funds to invest. On the other hand, the legal position of foreigners can also be questioned by the Indonesian citizen whose name is borrowed. Even though in reality the Indonesian citizen did not spend any money to purchase the land, legally, formally, proof of rights in the form of a certificate is registered in the name of the Indonesian citizen. So that the Indonesian citizen whose name is used is the one who is recognized as the owner/holder of rights to freehold land based on the applicable laws and regulations. Legal problems that occur between the parties (Indonesian citizens and foreigners) can occur if one of the parties files a legal claim related to the preparation of the deeds that underlie the legal relationship between them. However, if there are no questions between Indonesian citizens and foreigners, the legal construction that is made will proceed as agreed.

3.3 Potential Conflict: Foreigners' Right to Build in Special Economic Zones and the Integrity of Law 5/1960

The question of whether provisions allowing foreign citizens to own HGB in Special Economic Zones (*Kawasan Ekonomi Khusus/KEK*) contradict Law 5/1960 is complex and hinges on the interpretation of both general agrarian law and specific regulations for KEK.

Law 5/1960's general stance is that as the foundational law, Law 5/1960 generally limits direct land ownership (*Hak Milik*) to Indonesian citizens. For foreigners, Law 5/1960 primarily grants Right to Use (*Hak Pakai*) and Right to Lease (*Hak Sewa*). While HGB is a stronger right than *Hak Pakai* (as it grants the right to erect and own buildings on land for a specified period), Article 36 paragraph 1 of Law 5/1960 fundamentally designates Indonesian citizens and legal entities established under Indonesian law and domiciled in Indonesia as subjects eligible for HGB. This implies a general restriction on HGB ownership for foreigners in standard circumstances.

Meanwhile, the rationale for KEK Provisions is that KEK are established to accelerate economic growth, attract investment, and create employment opportunities. To achieve

⁹ Soedjono Dirdjosisworo, *Pengantar Ilmu Hukum* (Jakarta: PT Raja Grafindo Tinggi, 2010), 131.

¹⁰ *Ibid.*, 131.

these goals, KEK often offer various incentives and facilitations, including more flexible land ownership regulations for foreign investors. The intent is to streamline business operations and provide legal certainty for long-term investments, which might necessitate stronger land rights than mere *Hak Pakai* for the structures they build.

If specific regulations for KEK allow foreigners to directly hold HGB, it could be argued to be in tension with the spirit of Law 5/1960 of limiting land rights for foreigners, especially if those HGB rights are for purposes beyond strictly business operations (e.g., direct personal residential ownership not tied to the investment). Law 5/1960 aims to protect national land control for the welfare of the Indonesian people (as echoed in Article 33 of the 1945 Constitution).

However, such provisions in KEK are often enacted through special laws or implementing regulations (e.g., related to investment or KEK establishment) that are intended to be *lex specialis derogat legi generali* (special law overrides general law). This means the specific KEK regulations might be seen as an exception to the general rules in Law 5/1960, tailored to achieve specific economic objectives. The argument would be that the government has the authority to make such exceptions for strategic national interests, provided they are within constitutional bounds.

The critical distinction lies in the purpose and duration of the HGB. If the HGB in KEK is granted to foreign entities (companies) or individuals primarily for investment, business development, and commercial operations within the KEK, it might be justified as a necessary incentive. If it extends to unrestricted personal residential ownership for foreigners (beyond the scope of *Hak Pakai* already allowed) or for speculative purposes, the conflict with Law 5/1960 and constitutional principles (like those in Article 33 of the 1945 Constitution) becomes more pronounced.

To mitigate conflict, any such HGB rights for foreigners in KEK would likely come with strict conditions on duration, purpose, transferability, and size, similar to the limitations seen in *Hak Pakai*, ensuring that the land ultimately remains under state control and serves the national interest. While a direct allowance for foreigners to hold HGB in KEK could appear to contradict Law 5/1960's general restrictions, it is typically an outcome of special legislative efforts to attract foreign investment. The legality and harmony with Law 5/1960 would depend on the precise wording of the KEK regulations, the specific conditions attached to the HGB, and the overarching legal interpretation—whether these provisions are seen as legitimate *lex specialis* exceptions for national economic benefit or as an undermining of core agrarian principles. It's an area that often requires careful legal balancing between investment promotion and national land control.

4. CONCLUSION

The regulatory framework governing residential property ownership for foreigners in Indonesia, anchored by Law 5/1960 and updated by subsequent laws like the Job Creation Law and Government Regulation Number 18 of 2021, strictly limits foreigners to Right to Use (*Hak Pakai*) and Right to Lease (*Hak Sewa*) titles. However, the provision in Agrarian Minister Regulation 18/2021 allowing for residential areas wider than 2,000 m² for foreigners in "certain extraordinary circumstances" is viewed as problematic because the lack of a defined size limit for such exceptions violates the principles of nationality and Article 33 of the 1945 Constitution, which mandates that land be optimized for the welfare of the Indonesian people, creating a legal gap (empty norm) that urgently requires future legislative restriction. Furthermore, the use of nominee arrangements—a form of legal

circumvention where an Indonesian citizen registers the *Hak Milik* (Freehold Title) on behalf of a foreigner – is legally categorized as a void transaction, resulting in the land title being cancelled and potentially falling to the state, thereby causing the foreigner to suffer a complete loss of investment despite the Indonesian nominee, who legally holds the certificate, not having spent any money on the purchase.

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