

Criminal Liability of Perpetrators of Fake Marriage (Marriage Fraud) as a Form of Human Trafficking Crime

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Abstract: *The phenomenon of marriage fraud is increasingly widespread and has become one of the new schemes in human trafficking practices, particularly targeting women under the pretext of matchmaking or cross-border marriage. This modus operandi not only violates social and moral norms but also threatens human rights and involves elements of exploitation, which are essential components of human trafficking crimes as regulated in the United Nations Palermo Protocol and Law No. 21 of 2007 on the Eradication of the Crime of Human Trafficking. This study aims to analyze juridically and normatively how criminal liability can be imposed on perpetrators of marriage fraud, whether as the main offenders, recruiters, or parties facilitating this practice. By examining the provisions of the Criminal Code (KUHP), the Human Trafficking Law (UU TPPO), and other related regulations, it is found that the practice of marriage fraud can fulfill the elements of recruitment, transfer, harboring, and exploitation, which legitimately qualify as human trafficking crimes. In the context of criminal law, the liability of perpetrators includes not only individuals but also legal entities or agencies involved in organizing fake marriages. This study encourages the need for a progressive interpretation of the definition of exploitation in the Human Trafficking Law as well as strengthening protection mechanisms and education for vulnerable groups, especially women and migrant workers. With an appropriate legal approach, the practice of marriage fraud can be suppressed, and perpetrators can be held criminally accountable fairly and effectively.*

Keywords: Marriage fraud, human trafficking crimes, criminal liability.

INTRODUCTION

The phenomenon of marriage fraud has become one of the complex crime schemes within the dynamics of modern human trafficking (Arini, 2024). Marriage, which is essentially a legal and sacred institution, is abused as a tool for exploitation, deception, and even the deprivation of an individual's freedom (Priyambodo, 2023). Perpetrators of this crime use the guise of marriage to gain economic or sexual benefits from victims who are generally in vulnerable positions (Fitriyanti, 2021). Cases of marriage fraud are not only found in domestic contexts but also cross-border, where women often become the primary victims in fake matchmaking schemes promising a better life (Bachtiar, 2022). This reality indicates a deviation from the legal meaning of marriage itself.

Amid the prevalence of this practice, public legal awareness regarding the existence and legal impact of marriage fraud remains very limited. Many victims do not realize that they are becoming objects of exploitation because the relationship is packaged in the form of a marriage bond that appears formally legitimate (Juraidi, 2024). When marriage is used as an instrument to enslave or exploit a partner, the boundary between a personal relationship and criminal offense becomes blurred (Ismaidar, 2024). This poses a significant challenge for law enforcement in identifying and proving the elements of the crime within a context that is laden

with social and cultural norms. The lack of public knowledge also increases the opportunities for perpetrators to commit their crimes systematically and covertly.

The urgency for clear legal regulation against the practice of marriage fraud is growing stronger alongside the increasing number of cases and the complexity of its modus operandi (Septiyani, 2022). Current laws have not explicitly regulated marriage fraud as a form of human trafficking crime, even though the elements of exploitation inherent in this practice are actually encompassed within the definition of human trafficking offenses (Maulana, 2024). Effective law enforcement requires an adaptive and progressive legal interpretation so that law enforcement officers do not get trapped in a narrow definition of human trafficking (Sumaya, 2024). The existence of relevant regulations, including general and special criminal law, must be re-examined to be able to cover new modus operandi like this.

Within the framework of national law, marriage is regulated under Law No. 16 of 2019 as an amendment to Law No. 1 of 1974 on Marriage (Sebyar, 2022). This law regulates the conditions for a valid marriage, the rights and obligations of husband and wife, as well as the purpose of the marriage institution itself (Jahwa, 2024). However, this regulation has not explicitly anticipated deviations against the marriage institution that are carried out for criminal purposes. When the marriage bond is only used as a guide to traffic humans, legal protection for the victims becomes suboptimal. Understanding marriage fraud as a crime requires a linkage between family law and criminal law (Angela, 2024).

Terminologically, marriage fraud can be understood as a marriage conducted dishonestly or falsely, with the primary purpose of exploiting the spouse for certain benefits (Mulqiatama, 2025). The motives underlying this crime are varied, ranging from sexual exploitation, forced labor, to cross-border trafficking with the modus operandi of marriage sponsorship (Mulia, 2021). This practice not only harms the victims physically and psychologically but also places them in legal vulnerability because their position is not recognized or difficult to prove within the legal system. In some cases, perpetrators use fake documents or manipulate legal status to obscure the crimes committed. This adds difficulty to the law enforcement process against perpetrators of marriage fraud (Syaripudin, 2021).

In international law, marriage fraud can be analyzed through the lens of human trafficking crimes, particularly as regulated in the 2000 Palermo Protocol. This protocol defines human trafficking as the recruitment, transportation, transfer, harbouring, or receipt of persons by means of threat or use of force, abduction, fraud, and abuse of power for the purpose of exploitation (Sahetapy, 2022). Such exploitation includes, among others, sexual exploitation, forced labor, and deprivation of liberty (Sari, 2021). When marriage fraud contains these elements, it can be positioned as a form of trafficking that requires serious legal treatment. This protocol has been ratified and serves as a primary reference in the development of national laws in various countries, including Indonesia.

Law No. 21 of 2007 on the Eradication of the Crime of Human Trafficking is a national legal instrument that explicitly regulates and criminalizes various forms of human trafficking (Mawardi, 2020). Although it does not specifically mention marriage fraud, elements such as recruitment, deception, and exploitation within interpersonal relationships are sufficient to qualify this practice as a human trafficking crime. The articles in this law enable law enforcement officers to prosecute perpetrators if it is proven that marriage is used as a modus operandi for exploitation. The challenge lies in proving the intent and power relations within the relationship, which often occur covertly and are difficult for the public and authorities to access.

Criminal responsibility for perpetrators of marriage fraud must be placed within the context of Indonesian criminal law, which systematically regulates the concept of individual

responsibility. The Criminal Code (KUHP) as the basis of general criminal law, as well as the Draft Criminal Code (RKUHP) which will replace it, provide the foundation to assess the fault, acts, and responsibility of perpetrators in a crime (Muksin, 2023). In the context of marriage fraud, the main perpetrators can be sanctioned for their actions, while others such as recruiters, facilitators, or even matchmaking agencies can also be held accountable if proven to have participated in or assisted the crime. The principles of legality and justice become important principles in assessing the involvement of the parties.

The role of perpetrators in the crime of marriage fraud can be classified based on Articles 55 and 56 of the Criminal Code (KUHP), which distinguish between the direct perpetrators, the instigators, and those who participate or assist. The main perpetrators are those who commit the acts with full awareness of the exploitation purpose within the marriage. The assisting parties may not be directly involved in carrying out the crime but provide means, information, or facilities that enable the fraud to occur (Astuti, 2021). In many cases, marriage fraud networks consist of more than one perpetrator, working in an organized and cross-jurisdictional manner. This requires a comprehensive legal approach and not only focus on a single perpetrator.

This accountability mechanism shows that Indonesian criminal law is quite flexible in handling new crime methods as long as there is a progressive interpretation of existing regulations. Marriage fraud can no longer be seen merely as a violation of moral or family norms but as a form of systematic violence that can completely destroy a person's life. The law must be present not only to punish perpetrators but also to protect and restore victims in a fair process. The need for legal reform, officer training, and public education becomes an important agenda to comprehensively address this crime.

RESEARCH METHODS

This study uses a normative juridical method, which is a legal approach relying on library research to examine the positive legal norms applicable to the criminal liability of perpetrators of marriage fraud as a form of human trafficking. This approach aims to identify, review, and analyze legislation, legal principles, doctrines, and relevant jurisprudence related to the topic discussed. Data were obtained from primary legal materials such as Law Number 21 of 2007 on the Eradication of the Crime of Human Trafficking, the Criminal Code (KUHP), the latest Draft of the Criminal Code (RKUHP), Law Number 16 of 2019 concerning Amendments to Law Number 1 of 1974 on Marriage, as well as international legal instruments such as the 2000 Palermo Protocol. Secondary legal materials used include scientific literature, journal articles, and the views of criminal law and human rights experts that support the juridical analysis of the marriage fraud phenomenon. The analytical technique is qualitative, interpreting legal provisions systematically and comprehensively to find the appropriate legal construction of criminal liability of the perpetrators. This approach also accommodates progressive interpretation of elements of exploitation and power relations within marriage, considering social context and human rights protection of victims of human trafficking.

RESULT AND DISCUSSION

Marriage Fraud as a Modus of Human Trafficking Offense

The practice of marriage fraud as a modus of human trafficking has increasingly come to light through reports from state institutions and media coverage. According to data from the National Commission on Violence Against Women (Komnas Perempuan) and the Indonesian Migrant Workers Protection Agency (BP2MI), a number of Indonesian women—particularly

from regions with low levels of education and economic status—have been recruited by agents or individuals who promise marriage to well-off domestic or foreign men. After entering into either formal or informal marriages, these women are sent to other regions or abroad and are then forced to work without pay, subjected to sexual violence, or even sold to third parties. Such cases do not occur in isolation but form part of a chain involving recruitment, transfer, harboring, and exploitation—core elements of the crime of human trafficking. In this context, marriage fraud functions as a gateway to hidden exploitation that is difficult to detect at an early stage.

A distinctive characteristic of marriage fraud is the use of a marital relationship as a shield to protect perpetrators from legal detection. Most victims do not realize they are being exploited, as they are formally recognized as legal wives—yet without legal protection or basic rights as spouses. The exploitation experienced by the victims includes forced labor, domestic violence, and systematic sexual exploitation. In some cases, victims also lose their identity documents and access to legal aid or public services, further deepening their isolation. This practice demonstrates that marriage fraud may contain all the elements of human trafficking as defined in Article 1, point 1 of Law No. 21 of 2007 on the Eradication of the Crime of Human Trafficking.

The elements of human trafficking as stipulated in Articles 1 and 2 of the Law on the Eradication of Human Trafficking (UU TPPO) are highly relevant in qualifying marriage fraud as a criminal act of trafficking in persons. Article 1 point 1 defines human trafficking as the act of recruiting, transporting, harboring, sending, transferring, or receiving a person through threats of violence, use of force, abduction, confinement, forgery, fraud, abuse of power or vulnerable position, debt, or payment, for the purpose of exploitation. Marriage fraud almost always involves deception and the abuse of a vulnerable position, where the victim is promised a decent life but instead ends up in an exploitative situation. In many cases, the act, means, and purpose elements as described in Article 2(1) of the UU TPPO (which has been repealed by Article 455 of Law No. 1 of 2023) are fulfilled in the practice of marriage fraud.

Exploitation in marriage fraud manifests in various forms explicitly mentioned in Article 1 point 7 of the UU TPPO, including sexual exploitation, forced labor, slavery, and other similar practices. In several cases, victims are forced to work without pay in the husband's family home or are commercialized for sexual purposes without their consent. This exploitation not only violates fundamental human rights but also demonstrates the perpetrator's absolute control over the victim. The power imbalance in marriage fraud is often extreme, with victims further isolated socially and made economically dependent. These elements indicate that marriage fraud can be categorized as a form of human trafficking when viewed substantively, and not merely through the formal lens of a marital relationship.

Law enforcement against marriage fraud cases in Indonesia still faces numerous challenges, particularly in enforcement and evidentiary aspects. In practice, handling of cases at the level of the National Police (Polri), the Prosecutor's Office, and the Courts reveals that many law enforcement officers still struggle to identify elements of human trafficking (TPPO) in fraudulent marriages. This is exacerbated by the absence of specific regulations that explicitly define marriage fraud as a criminal offense. Some cases are even processed merely as ordinary fraud or immigration administrative violations, without addressing the dimension of exploitation. This situation weakens victim protection and results in minimal deterrent effects for the perpetrators.

One of the main obstacles in proving marriage fraud as a form of TPPO is the difficulty in legally demonstrating the element of exploitation. Many victims are reluctant to speak out due to fear of their spouse, feelings of shame, or lack of awareness that their situation qualifies

as trafficking in persons. Proving TPPO cases requires establishing a causal relationship between the act of recruitment and the purpose of exploitation, which is often concealed within a marital relationship. In addition, the provisions of the Indonesian Criminal Procedure Code (KUHP) do not yet provide optimal space for a victim-centered approach, causing victim testimony to often be considered insufficient without additional supporting evidence. This highlights the urgent need for a reformed approach in handling marriage fraud cases.

Current regulations have yet to provide a specific definition or protection mechanism for victims of marriage fraud within the context of human trafficking. In fact, the Indonesian Anti-Trafficking Law (UU TPPO), through Articles 18 to 30, guarantees victims the right to rehabilitation, restitution, and compensation. However, in practice, these rights are rarely granted because marriage fraud is often not recognized as a form of trafficking. The absence of technical provisions guiding law enforcement in handling marriage as a trafficking modus renders the law ineffective. As a result, many victims do not receive proper recovery and are even forced to return to exploitative environments due to a lack of adequate state support.

Effective law enforcement against perpetrators of marriage fraud requires a comprehensive understanding of the intersection between family law and criminal law. Marriage fraud is not merely a violation of moral commitments, but a serious crime that manipulates the institution of marriage for exploitative purposes. The Anti-Trafficking Law, the Indonesian Criminal Code (KUHP), and international legal instruments such as the Palermo Protocol should be interpreted in an integrated manner to effectively reach and prosecute perpetrators of this crime. A multidisciplinary and collaborative approach involving law enforcement, women's protection agencies, and civil society is essential to uncover and break the chain of exploitation under the guise of marriage. Marriage as a sacred institution must be restored to its fundamental values—free from coercion, exploitation, and violence.

Criminal Liability of Perpetrators of Marriage Fraud

Criminal liability for perpetrators of marriage fraud must be understood through a broad and flexible approach, given that this modus operandi often involves multiple actors and operates within a complex structure. In practice, the perpetrator is not limited to the individual who directly “marries” the victim, but may also include recruiters, financiers, intermediaries, and even third parties who facilitate the victim's departure or placement. This construction of criminal liability can be applied through the provisions of Article 55 paragraph (1) of the Indonesian Criminal Code (KUHP), which states that those who commit, order to commit, or participate in committing an act are all punishable as perpetrators of a criminal offense. These forms of involvement require an individual analysis of each actor's role to ensure that the criminal sanctions imposed are proportional and aligned with their contribution to the crime.

The role of accomplices, as described in Article 55 paragraph (1) point 2 of the KUHP, is particularly relevant in addressing parties who do not directly engage in the act of fraudulent marriage, but who participate in the recruitment or organization of the victim. For example, agents who provide facilities or false information regarding a prospective spouse and the purpose of the marriage may be categorized as accomplices. Meanwhile, Article 56 of the KUHP regulates assistance in criminal acts, which may apply to parties who provide the means or opportunity for marriage fraud to occur, such as rogue civil registry officers or illegal service agents. Understanding these two articles is crucial so that law enforcement does not stop at the main perpetrator but is able to ensnare the entire criminal network.

Criminal sanctions against perpetrators of marriage fraud who are proven to meet the elements of human trafficking can be applied based on the provisions of Law No. 21 of 2007. Article 2 paragraph (1) of the Anti-Trafficking in Persons Law (which has been repealed by

Article 455 of Law No. 1 of 2023) stated that perpetrators of human trafficking may be punished with imprisonment of at least 3 years and up to 15 years, as well as a fine ranging from category IV (up to IDR 200,000,000) to category VII (up to IDR 5,000,000,000). In addition to these principal punishments, Articles 18 to 20 of the same law also regulate the imposition of additional penalties, including the revocation of business licenses, public announcement of the court's verdict, and confiscation of criminal proceeds. These provisions provide a strong legal basis to create a deterrent effect, especially when the perpetrator is part of a structure oriented toward economic gain.

In cases where marriage fraud is carried out by an institution or corporation—such as a matchmaking agency or labor placement company—such entities may also be held criminally liable. Article 13 of the Anti-Trafficking Law allows for legal entities to be subject to both administrative and criminal sanctions. This concept of corporate criminal liability has also been incorporated into the 2023 Draft Criminal Code (RKUHP), particularly Article 45, which affirms that a corporation can be held criminally responsible if the offense is committed in the interest or for the benefit of the corporation. This demonstrates that the Indonesian legal system already provides a sufficient foundation for addressing non-individual entities involved in exploitation through fraudulent marriages.

The imposition of criminal sanctions on corporations also reflects the development of modern criminal law thinking, which not only focuses on individuals but also considers the systemic role of institutions or organizations. For instance, if a matchmaking agency is proven to have engaged in fraudulent marriage practices with the intent to exploit victims, it may be subject not only to administrative sanctions such as license revocation, but also to substantial fines. This approach aims to dismantle human trafficking practices that hide behind legal entities. On the other hand, law enforcement officers must be encouraged to be more proactive in developing evidence tools and legal interpretations to ensure collective and structural accountability.

Analyzing jurisprudence is important to understand how courts interpret and classify marriage fraud within the criminal law framework, particularly human trafficking. Although explicit rulings on marriage fraud are still limited, there are several human trafficking cases that reveal exploitative patterns through personal relationships such as dating or short-term marriages. In such rulings, judges generally focus on evidence of coercion, deception, and exploitation—regardless of marital status. This pattern provides an interpretive foundation that marital status does not automatically negate the possibility of a crime but instead must be examined to determine whether the relationship was used as a tool to control and exploit the victim.

Judicial interpretation of the element of “exploitation” has also evolved, extending beyond sexual exploitation to include forced labor, economic abuse, and systematic social isolation. In this context, *marriage fraud* can be understood as a subtle form of exploitation, carried out through relationships that are legally and socially recognized as legitimate. Courts are required to adopt a substantive approach in examining facts that reveal power imbalances, restrictions of freedom, and the extraction of benefits from the victim's suffering. Strengthening judges' capacity to understand gender contexts, power relations, and the dynamics of domestic violence is crucial to uncovering exploitative motives behind sham marriages.

The absence of strong legal precedent regarding marriage fraud should not be a reason to refrain from prosecuting perpetrators under relevant provisions of the Anti-Trafficking Law (UU TPPO) and the Criminal Code (KUHP). On the contrary, this situation should motivate law enforcement officials and legal scholars to develop a progressive and responsive legal construction to address emerging forms of crime. An interdisciplinary approach—combining

criminal law, family law, and international law—can serve as a new model in formulating criminal liability for perpetrators. Clear legal construction of accountability also ensures legal certainty and maximum protection for victims who have lost their rights through painful, deceptive marriages. Building legal doctrine through progressive jurisprudence is a vital step in confronting crimes that continue to evolve in form and method.

CONCLUSION

The issue of *marriage fraud* as a new *modus operandi* in human trafficking highlights the urgent need for a renewed approach in criminal law—one that goes beyond the formalities of social relationships and instead focuses on the substance of exploitation occurring within them. This research demonstrates that the practice of marriage fraud in Indonesia meets the elements stipulated in Article 1 and Article 2 of Law No. 21 of 2007 on the Eradication of Human Trafficking (which was repealed by Law No. 1 of 2023, Article 455), particularly in terms of recruitment through deception and exploitation through forced labor, sexual violence, and the deprivation of victims' liberty. Marriage, as a legal institution meant to uphold individual rights and dignity, has instead become a loophole exploited by perpetrators of crime. While the existing legal framework is relatively adequate, its implementation continues to face major challenges—especially in proving elements of exploitation and comprehensively identifying all actors involved. Administrative disorder, lack of understanding among law enforcement, and the limited development of jurisprudence reinforce the urgency to strengthen the legal system's capacity to effectively address this phenomenon.

This study recommends the harmonization of laws, including the Criminal Code (KUHP), the Anti-Trafficking Law (UU TPPPO), and other sectoral regulations, as well as the enhancement of specialized training for investigators, prosecutors, and judges in identifying and prosecuting marriage fraud cases. The government should also establish additional technical regulations that explicitly define and regulate sham marriages as part of human trafficking crimes. Furthermore, increasing public legal literacy is vital to prevent the emergence of new victims, particularly in areas with high migration rates and limited access to information. Collaborative efforts between the government, civil society organizations, and international institutions must be strengthened to enhance victim protection and create a law enforcement system that is responsive to the evolving tactics used in human trafficking. Legal action against perpetrators of marriage fraud must be grounded in a gender justice and human rights perspective, ensuring that victims receive proper redress and perpetrators are held accountable with appropriate penalties.

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