

LEGAL CONSEQUENCES OF THE JUDGE'S DECISION ON BIOLOGICAL CHILDREN FROM SIRI MARRIAGE

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Abstract

Children born from a siri marriage can apply for the origin of children to obtain legal protection, as is the application for determination of the origin of children from siri marriage in the Karawang Religious Court Number: 440/Pdt.P/2023/PA.Krw. This raises the legal consequences between the biological father and the biological child determined by the Judge. The purpose of this study is to examine the legal consequences of the judge's determination of biological children from a siri marriage. The research used is normative legal research. The results of the study found that children from siri marriage who are determined as biological children should get the following rights: right to have an identity; right to sustenance and maintenance in the form of right to obtain education, health services, and obtain welfare; and inheritance rights through mandatory will. The obligation of the biological father to the biological child should be determined as sociologically obliged to protect the biological child so that the child is guaranteed and fulfilled the rights of the child so that the child can live, grow and participate optimally according to the dignity of humanity and get protection from violence and discrimination, the child becomes quality, good personality, and prosperous.

Keywords: Biological Children, Children's Rights, Siri Marriage

INTRODUCTION

Marriage is a voluntary union based on a mutual agreement between the parties that ultimately results in the creation of rights and obligations. As such, marriage is a right enjoyed by every Indonesian citizen and should not be forced by other parties, according to Article 28B paragraph (1) of the 1945 Constitution, which states that "everyone have the right to start a family and raise their offspring by getting married legally" (Gemail et al., 2019). Article 1 of the Marriage Law states that "marriage is a physical and mental tie formed by a man and a woman as husband and wife, with the goal of creating a joyful and eternal family (household) based on the almighty God". This law governs marriage in Indonesia and was amended by Law Number 16 of 2019 concerning Amendments to Law Number 1 of 1974 concerning Marriage. This makes it extremely evident that religion and spirituality are closely related to marriage, meaning that marriage has both an outside (physical) and an interior (spiritual) component.

Every person who enters into a marriage must fulfill the requirements set by the Marriage Law such as the age limit, the marriage must be of the same religion, and the marriage is recorded. This is so that every marriage does not violate the prevailing norms and is also an administrative order (Ikhtiarina et al., 2020). In order to establish legal order, marriage registration authorities administer the administrative data collecting of marriages. Residents are required to record legal marriage based on laws and regulations to the implementing agency where the marriage event takes place within 60 (sixty) days after the marriage date. Marriage registration is in principle a basic right in the family as well as an effort to protect the wife and children in obtaining family rights such as marital property, reciprocal relationships between parents and children, child maintenance obligations, and inheritance (Mahera & Rahim, 2022). Marriage registration is needed by someone to obtain legality for their marriage. This marriage certificate is proof that a marriage has actually taken place.

The existence of marriage needs to be protected by Indonesian law in accordance with applicable laws and regulations, so that the marriage performed has legal force. However, in practice, some people still opt to get married in a manner that defies the

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norms of positive law, such as getting married in accordance with one's religion and beliefs without getting official government registration, or what is known as a "siri marriage." A marriage that is performed in secret or covertly and isn't recorded with the marriage registration officer is known as a siri marriage, because the marriage takes place without being officially registered with the authorities, the government is unaware of the legal activity, so the marriage has no legal action (Amalia et al., 2022).

Children born from unregistered marriages (siri marriages) do not immediately receive legal protection, however, the parents of these children can apply for the origin of the child. Determination of the origin of the child is very important, because with the determination, the legal relationship between the child and the father and the legal consequences of the relationship can be known. As there is a request for determination of the origin of children in the Karawang Religious Court Number: 440/Pdt.P/2023/PA.Krw which determines the application for the origin of children from a siri marriage. Starting on August 04, 2019, Applicant I and Applicant II entered into a siri marriage, from this siri marriage they were blessed with a daughter who was born on January 24, 2020. The applicants had remarried and registered the marriage at the KUA (Office of Religious Affairs) of East Karawang District on June 19, 2023. Then, the applicants applied for a determination of the origin of the child to the Karawang Religious Court because the applicants' child, Jannifer Ainaya Afni Maramis, was born earlier than the issuance of the marriage certificate quotation book. The judge of the Karawang Religious Court decided to grant the applicants application and determined that the applicants child was the biological child of the applicants born in a siri marriage.

The determination of the application for the origin of the child is a form of regulating the benefit of world life regulated by the government so that the benefit can be felt by biological children born from a siri marriage, but the determination of the application for the origin of the child the court judge did not consider the benefit of the child and did not consider the protection of children's rights oriented to the principle of the best interests of the child related to the rights as a biological child of a siri marriage. As with the determination of the origin of children who are determined as biological children do not directly have rights attached to them, as this is different from legal children who automatically have rights attached to them because legal children are children born in or as a result of a legal marriage. Thus, the law must provide protection related to the rights that exist in these biological children. The law must be able to protect all parties because everyone is in the same position ahead of the law; every law enforcement officer must be able to enforce the law in accordance with the function of the rule of law; and the law must be able to protect every legal relationship or aspect of community life governed by law. Legal protection is a description of the operation of the legal function to realize legal objectives, namely ensuring order, justice, benefit, and legal certainty, in this case which must be accepted by biological children from siri marriage and cannot be released from the responsibility of the parents of these biological children (Toif, 2024).

METHODS

Normative research methodologies are used in this study. Examining legal materials obtained from different laws and regulations as well as other materials from diverse literary works is the process of doing normative research. employed the deductive approach of analysis, which involved describing and tying together the legal documents gathered for this investigation. The results were then methodically presented in order to address the issues raised. Both a conceptual and a statutory approach are used in this study strategy. Primary and secondary legal materials are the two categories of legal materials that are employed. The process of gathering legal documentation involves a review of the literature. (Marzuki, 2019).

RESULTS AND DISCUSSION

A. Legal Consequences Of The Judge's Decision On Biological Children From Siri Marriage

Every child should be given their legal rights without having to ask for them, and every kid deserves to have their dignity upheld. This is in accordance with the terms of the Convention on the Rights of the Child, which was approved by the Indonesian government by Presidential Decree Number 36 of 1990 about the Ratification of the Convention on the Rights of the Child. The main principles of child protection nondiscrimination, the child's best interests, survival and growth, and respect for the child's participation are outlined in these clauses (Ibrahim et al., 2018). The birth of a child from a marriage gives rise to rights and obligations with legal subjects including the father, mother, and child. Every child has civil rights, which are rights that are legally given to every child in relation to the legal relationship with their parents. The legal relationship results in reciprocity related to the rights and obligations inherent between children and their parents.

Children's rights are human rights that are valued and safeguarded by the law even from the moment of unborn child according to Article 52 paragraph (2) of Law Number 39 of 1999 concerning Human Rights. Among a child's fundamental rights are the right to care and education, the right to know their origins, the right to legal representation in court and out of it, the right to manage their property, and the right to inherit. Law Number 35 of 2014 on the Amendment to Law Number 23 of 2002 on Child Protection affirms a child's rights to a name as a self-identity and citizenship status, as well as their freedom to practice their religion, think and behave according to their age and intelligence level under parental guidance, know and be raised by their own parents, and have their identity listed on their birth certificate (Baihaki, 2023).

Children from siri marriages that are designated as biological children do not directly have rights attached to them, as this is different from legal children who automatically have rights attached to them, because legal children are children born in or as a result of a legal marriage. In order for children born from siri marriages to also be entitled to justice and protection, the biological child must be granted his rights and protection under the state's guarantee of the welfare of all its people, including the protection of children's rights, which are human rights.

Protection of children's rights has not been given to biological children born from siri marriage as determined by the Karawang Religious Court number 440/Pdt.P/2023/PA.Krw. The Judge's stipulation does not specify what rights biological children of a siri marriage must possess; rather, it just offers legal certainty regarding the status of children born of a siri marriage. Through the provision of legal clarity and certainty regarding the child's legal status and the civil rights attributed to him, the Religious Court should be able to contribute to the implementation of legal protection for children who are determined to be biological offspring of siri marriage. Indirectly, the law must be able to protect all legal relationships and aspects of community life that are governed by it. It must also be able to provide justice and serve as a means of achieving welfare for the entire community. As a result, every apparatus should be able to enforce the law in accordance with the rule of law (Muhlashin, 2021). Protection, justice and welfare are aimed at the subject of law, namely the supporters of rights and obligations, in this case aimed at biological fathers and biological children established from the siri marriage.

Legal consequences are any and all outcomes of all actions taken by legal subjects against legal objects, as well as any additional effects of specific occurrences that the applicable law has defined or deemed to be legal consequences. Legal consequences give rise to rights and obligations for legal subjects (Yuhelson, 2017). Thus, the legal subjects in the determination have rights and obligations between the biological father

and the biological child of the siri marriage. The rights that should be given to the biological child of a siri marriage determined by the judge are as follows:

1. Right to Identity: The ownership of a child's name is a right that must be given to the child, as affirmed in Article 53 paragraph (2) of Law Number 39 of 1999 concerning Human Rights which states that "Every child have the right to a name and citizenship status from the moment of their birth". In relation to this, one of the state's obligations to protect its citizens, especially to protect Indonesian children, is to ensure that every Indonesian child has the right to obtain an identity in the form of a birth certificate. Birth certificates are very important to protect legal personal identity and other rights (Mahesti & Ramasari, 2022). The Karawang Religious Court's decree, number 440/Pdt.P/2023/PA.Krw, grants biological offspring of siri marriages the right to an identity. One of the tenets of the Convention on the Rights of the Child, specifically the right to life, survival, and growth as stated in Article 2 of Law Number 23 of 2002 Concerning Child Protection, has been reflected in the provision. The concept of the right to life, survival, and development in this context refers to a child's entitlement to life, access to the necessities of life, and the opportunity to fulfill their potential in all spheres of existence. As stated in Presidential Decree Number 36 of 1990 concerning the Ratification of the Convention on the Rights of the Child, which explains that children have the right to live with their parents, this principle is a part of the most fundamental human rights for children that are protected by the state and parents. The Karawang Religious Court, bearing case number 440/Pdt.P/2023/PA, so determined the biological child of a siri marriage. The Karawang Regency Population and Civil Registration Office may utilize Krw as legal justification to issue Jannifer Ainaya Afni Maramis' birth certificate. As a result, the biological child of the Siri marriage has been granted legal protection and clarity with regard to their identification rights.
2. Right to Maintenance and Sustenance: Sustenance is a person's obligation that arises as a result of actions that contain the burden of responsibility in the form of everything that has a beneficial value or material value that a father can provide to his child. A child has the right to maintenance from his father, which includes clothing, housing, and other necessities. A father is obligated to provide for his child, in order to grow up to be a moral citizen, every child has the right to services that facilitate the growth of their skills and social life in line with national ideals. Both in the womb and after birth, children have the right to care and protection. Children also have the right to be shielded from environments that could be detrimental to their development and growth (Lestari, 2017). Every child is entitled to the right to maintenance as it is part of the right to maintenance. Child maintenance is basically the child's interest for physical, spiritual, intellectual and religious growth. Child maintenance is a parental responsibility to supervise, provide proper services and fulfill the living needs of a child by parents. The rights of maintenance and maintenance towards children as regulated in the legislation are as follows:
 - a. Law No. 4 of 1979 concerning Child Welfare, as contained in art:
 - 1) Article 2 paragraph (1), " Every child has the right to be cared for, nurtured, and guided by love in both their families and in special care settings so that they can naturally grow and develop".
 - 2) Article 2 paragraph (2), "Every child has the right to services that support the development of their abilities and social life so they can grow up to be good and helpful citizens, in line with the national culture and personality". These services are intended to provide opportunities for education and health.
 - 3) Article 2 paragraph (3), "Every child has are entitled to care and protection from the moment they are conceived until they are born."

- 4) Article 2 paragraph (4), "Every child has the right to be protected from an environment that could harm or hinder their proper growth and development".
- b. Law Number 39 of 1999 on Human Rights, as contained in art:
- 1) Article 55, "Every child has the right to freely practice religion and to think and express themselves in ways that are appropriate for their age and intellectual capacity while being watched over by their parents or guardians".
 - 2) Article 57 paragraph (1), "Every child has the right to have his or her parents or legal guardians raise, nurture, care for, educate, direct, and guide them throughout life in compliance with the laws and regulations in effect until they reach adulthood".
 - 3) Article 58 paragraph (1), "Every child has the right to legal protection against all sorts of abuse, including sexual abuse, neglect, and physical or mental violence, while in the care of their parents, guardians, or other caregivers".
 - 4) Article 60 paragraph (1), "Every child has the right to education and instruction so that their personality can develop in line with their interests, abilities, and level of intelligence".
 - 5) Article 60 paragraph (2), "Every child has the right, for the benefit of their own development, to seek, receive, and impart information appropriate to their age and intellectual ability, as long as it complies with decency and propriety norms".
 - 6) Article 61, "Every child has the right to play, sleep, mingle with peers their age, and express themselves creatively in accordance with their interests, aptitudes, and degree of intelligence for the benefit of their own development".
 - 7) Article 62, "Every child has the right to health care and social security benefits based on their physical, mental, spiritual, and social requirements".
- c. Law Number 23 of 2002 on Child Protection, as contained in art:
- 1) Article 4, "Every child has the right to be free from discrimination and violence, as well as the right to a life that is reasonable, growth-oriented, and respectful of human dignity".
 - 2) Article 8, "Every child has the right to health care and social security benefits based on their physical, mental, spiritual, and social requirements".
 - 3) Article 10, "Every child has the right to express themselves, to be heard, and to receive, seek out, and give knowledge appropriate to their age and intellectual level in order to support their development in line with moral principles of propriety and decency".
 - 4) Article 11, "Every child has the right to rest and spend leisure time with other children their age, to play, recreate, and be creative in accordance with their hobbies, abilities, and intellect level in order to develop themselves".
- d. Law Number 35 of 2014 concerning Amendments to Law Number 23 of 2002 concerning Child Protection, as contained in article:
- 1) Article 6, "Every child under the supervision of parents or guardians, has the right to worship in accordance with their faith, to think, and to express themselves in accordance with their age and degree of intelligence. This clause aims to provide children with the freedom to grow in terms of their creativity and intellectual capacity (such as reasoning ability) in proportion to their age. The clause also stresses that parental or guardian supervision is still necessary for this kind of growth".
 - 2) Article 9 paragraph (1), "Every child has the right to instruction and learning in order to develop their intelligence and personality in line with their interests and abilities".

- 3) Article 14 paragraph (1), "Every child has the right to be raised by his or her own parents, unless there are good reasons and/or legal criteria indicating that the child's best interests and ultimate consideration are best served by separation".

These rights should also be obtained by children of siri marriage who are designated as biological children. The realization of these rights is very important because of the obligations of the biological father towards the livelihood, maintenance and education of the child to the biological child of the siri marriage. Thus, the judge should consider giving punishment to the biological father who caused the birth to meet the needs of the child's life as based on the Fatwa of the Indonesian Ulema Council Number 11 of 2012 concerning the Position of Children of Zina and the Treatment of Them, dated March 10, 2012 and the results of the Coordination Meeting of the Directorate General of Religious Courts, Chambers of Religion and High Courts of Religion/Aceh Syar'iyah Courts on September 17, 2019 in the field of material law number 1 related to civil relations in Constitutional Court Decision Number 46/PUU-VIII/2010 dated February 17, 2012, the civil relationship is included in a limited civil relationship, which is limited to fulfilling the needs of the child (sustenance, education costs, health costs and shelter), so that children born from a siri marriage who are determined to be biological children have the right to sustenance and maintenance attached to them based on a court decision.

3. Right to Inheritance: One of the rights of children in a family is to get inheritance. Inheritance rights are rights that must be obtained by the heirs that come from the heir's property. Which comes from the heir's estate. Heirs are people who entitled to receive the inheritance (inherit) of the person who died, either because of family or marriage. Family or marital relationship. Of course the heirs have rights that have been determined based on religious rules. The principle of equality before the law means that every citizen has the same position in law and government. The state has the obligation to protect every citizen from all forms of discrimination. So that equality before the law must be interpreted dynamically that is balanced with the equal treatment of every person (Rusydi, 2019). According to Article 49 letter b of Law Number 50 of 2009 on the Second Amendment of Law No. 3 of 2006 Concerning the Amendment to Law No. 7 of 1989 Concerning Religious Courts "Inheritance is defined as identifying the heir, determining the inheritance, identifying each heir's share, and distributing the inheritance. It also includes a court ruling on an individual's request to identify the heir and determine each heir's share". Inheritance is defined in the Compilation of Islamic Law as the body of law that governs the distribution of property ownership rights that an heir leaves behind, ascertains what the heir left behind, and establishes who is eligible to inherit inherit property and how much of it is distributed (Jarchosi, 2020). Children's inheritance rights are inseparable from a previous marriage bond. In relation to the inheritance rights of a child born from a siri marriage to his biological father, until whenever the child remains as a child. to his biological father, at any time the child remains as a child who has a civil relationship with his father. Thus what is meant by civil rights of children born from siri marriages in inheritance relationships is the status of children obtained from the interpretation of the Constitutional Court Decision Number 46/PUU-VIII/2010 (Nama, 2014). Related to the determination of the Karawang Religious Court number 440/Pdt.P/2023/PA.Krw The judge has determined the child from the siri marriage as a biological child, so that the biological child should get protection against inheritance rights obtained by him. The biological child should be protected from the acquired inheritance rights since legal protection safeguards the rights of the injured child and human rights that are violated by the child, it

also allows the child to benefit from all legal rights bestowed upon them.

The judge in determination number 440/Pdt.P/2023/PA.Krw should have consider giving punishment to the biological father who caused his birth by giving property after the biological father through a mandatory will (wajibah) as based on the Fatwa of the Indonesian Ulama Council No. 11/2012 on the Status of Children Born of Indonesian Ulama Council No. 11 of 2012 on the Position of Zina's Children and the Treatment of Them, dated 10 March 2012. Treatment of them, dated 10 March 2012 and the results of the Coordination Meeting of the Directorate General of Religious Courts, Chambers of Religious Affairs and High Courts of Religious Courts/Aceh Courts Syar'iyah on 17 September 2019 in the field of law materill number 1 related to civil relations in the Constitutional Court Decision Number 46/PUU-VIII/2010/2010 dated 17 February 2012, as well as Supreme Court Circular Letter Number 3 of 2023. Supreme Court Circular Letter Number 3 Year 2023 Formulation of Religious Chambers, on the basis of this basis, the civil relationship is included in the civil relationship limited civil relationship, which is limited to giving property after the biological father dies through a will world through a will, so that children born from a siri marriage which is determined as a biological child has inheritance rights through a mandatory will (wajibah) inheritance rights attached to him based on a stipulation of the court.

Thus, compulsory bequest is the the absolute right of the owner of the property who will bequeath his property because Islamic law recognises the freedom of choice and guarantees for every Muslim in doing legal deeds on his rights, therefore if the biological father of the biological child will bequeath his property. Biological child will bequeath his property, then no one can prevent it. prevent it. Islamic law only helps the rights of the child by determining not to let the mandatory will exceed 1/3 (one third) of the property or should not be less 2/3 (two thirds) of the biological father's estate which is the right of biological children from siri marriage (Aprianto, 2019).

The biological father has a socially established obligation to protect his biological child in order to ensure that the child's rights to life, growth, and development are upheld. Children's rights must be respected in order to allow children to live, grow, develop, and participate as fully as possible in accordance with human dignity. To grow up to be polite, successful children, they must also be shielded from discrimination and acts of violence.

These rights and obligations are inherent in each individual and are derived from the clear determination. The determination of a child's origin has a very important role in determining a person's legal status. Determining the legal status of children has significant implications for their lives, including legal status of the child has significant implications in their lives, including the right to have an identity, the right to alimony and maintenance, and the right to inheritance. Protection of children's rights related to their origins is a necessity that cannot be ignored. Every child has the right to know their identity and relationship with their parents. This right is not only important for the child's personal interest, but also to safeguard their overall welfare, to safeguard their overall wellbeing, hence the need for a child origin determination of a child's origins that ensures the fulfilment of these rights and obligations in a fair.

CONCLUSION

The legal consequences of the Judge's finding of the biological child of a marriage siri places the child does not have a legal relationship based on the law of marriage. Thus the legal consequences of the biological child should get the rights regulated in the legislation, should get the rights regulated in the legislation in terms of child protection consisting of in terms of child protection which consists of: a. the right to have an identity; b. the right to sustenance and maintenance in the form of the right to get proper maintenance, the right to obtain education, the right to obtain health services,

the right to be cared for by the biological father, the right to obtain welfare, the right to receive guidance to grow and to grow and develop, the right to a proper environment, and the right to an adequate standard of living; and c. inheritance rights through mandatory wills. Obligations of the biological father to biological children that should be determined as sociologically obliged to protect his biological child so that the child is guaranteed and fulfilled the rights of the child so that it can be and fulfil the rights of children so that they can be protected from violence and discrimination, grow, develop, and participate as best they can in accordance with human dignity, and so that the child grows up to be prosperous and of high quality.

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