

# Between Permit and Title: Legal Reconstruction of Apartment Ownership and Licensing Systems

Zaki Achmad Syamsuddin<sup>1</sup>✉, Salsabila Shafa Khairunnisa<sup>2</sup>

<sup>1</sup> Universiti Utara Malaysia, Kedah, Malaysia

<sup>2</sup> Universitas Negeri Semarang, Semarang, Indonesia

✉ Corresponding email: [zaki.syamsuddin@uum.edu.my](mailto:zaki.syamsuddin@uum.edu.my)

---

## Abstract

The dispute between residents and the management of the Solo Paragon Apartment demonstrates that legal protection for consumers in vertical housing is ineffective. This study aims to analyze the forms of legal protection available to apartment residents as consumers in the face of management's actions that restrict access to shared facilities. This study uses a normative juridical approach, using a case study of the dispute at the Solo Paragon Apartment. The results indicate that the management's actions are inconsistent with Law Number 8 of 1999 concerning Consumer Protection and the Government Regulation on Apartments. The court ruling stated that the management had committed an unlawful act, and residents are entitled to restored access to facilities. The study concludes that there is a need to strengthen regulations and oversight in apartment management to ensure legal protection for consumers. This protection must be active and comprehensive, both in terms of prevention and enforcement of violations. This case serves as a clear example of the weakness of

consumer protection in apartment management practices and the importance of regulatory reform and legal assistance for consumers.

## Keywords

*Consumer protection, apartments, unlawful acts.*

## A. Introduction

In recent years, apartments have developed very rapidly in major urban centers in Indonesia. This arises as a response to increasing population growth and limited space in urban areas. Solo is a rapidly developing city, reflecting the cause of this phenomenon with the emergence of several apartment projects, including the Solo Paragon Apartment. This multi-functional complex combines residential, retail, and hotel functions, offering a unique approach to urban living that goes beyond conventional living spaces. This type of development is subject to additional legal considerations beyond those applicable to purely residential apartments. For example, licensing procedures, zoning plans, and management structures can become more complex due to the numerous aspects of activities occurring within a building.<sup>1</sup>

The emergence of multi-purpose developments such as Apartments raises complex questions regarding the legal framework governing ownership and management in Indonesia. The legal landscape must be adapted to accommodate the combined nuances of residential and commercial functions. Residents of such complexes may have different rights and obligations from residents of traditional residential buildings. Therefore, in-depth knowledge of the applicable laws regarding property ownership, such as the "*Strata Title Certificate*" (SHMSRS), is required. This detailed framework explains the rights of

---

<sup>1</sup> Wongso, Sinta, Yuhelson Yuhelson, and Bernard Bernard. "Perlindungan Hukum Bagi Penguni Apartemen Terkait Dengan Dualisme Pembentukan Perhimpunan Penghuni Rumah Susun." *Jurnal Multidisiplin Indonesia* 2, no. 8 (2023): 2073-2089; Saputri, Elsa Mellinda, Waspiyah Waspiyah, and Ridwan Arifin. "Perlindungan Hukum Terhadap Konsumen dalam Hal Pengembang (Developer) Apartemen Dinyatakan Pailit." *Jurnal Hukum Bisnis Bonum Commune* 2, no. 2 (2019): 151.

individual residential unit owners, influences property management regulations, and establishes procedures for resolving disputes between residents and between residents and management.<sup>2</sup>

The purpose of this legal review is to classify several key questions regarding one of the apartments in Solo, namely the Solo Paragon Apartment. What is the relevant legal basis for owning and managing real estate in apartments in Indonesia? Furthermore, the nature of the permits and approvals required for the construction of Solo Paragon Apartment is being reviewed to determine whether these permits and approvals comply with city planning. An examination of the emphasis on SHMSRS can explain the law of individual ownership rights in this complex environment, which ultimately influences the strategic position of real estate investment.<sup>3</sup> Besides that, it is important to conduct research on the existing legal mechanisms in the management and regulation of apartments, related to the role of the Association of Apartment Unit Residents (PPPSRS). This organization plays an important role in effective building management, from enforcing regulations to resolving tenant disputes. It is important for residents and investors to understand how these entities operate and what legal authority they possess.<sup>4</sup>

The legal guarantees and protections provided to owners and residents of the Solo Paragon Apartment are another important aspect that needs to be considered. A key issue is how the Indonesian legal system protects these stakeholders from potential conflicts or problems

---

<sup>2</sup> Martin, Abraham Yazdi, et al. "The development concept of law certainty on the building cadastral toward the rights of ownership on the strata title rights based on property law in Indonesia." *International E-Journal of Advances in Social Sciences* 5, no. 14 (2019): 956-966.

<sup>3</sup> Setiawati, Anda. "Shifting the Concept of Flats Ownership in Indonesia." *3rd Borobudur International Symposium on Humanities and Social Science 2021 (BIS-HSS 2021)*. Atlantis Press, 2022; Yuniyanti, Salma Suroyya. "The philosophical foundation of the coherence of regulations concerning apartment in Indonesia." *Journal of Morality and Legal Culture* 1, no. 1 (2020): 18-23.

<sup>4</sup> Lesmana, Marsella, and Sri Laksmi Anindita. "Perlindungan Hukum Pembeli Apartemen Terkait Transparansi Informasi Status Hak Atas Tanah Bersama Apartemen: Legal Protection of Apartment Buyers Related to Transparency of Shared Land Rights Status Information." *Reformasi Hukum* 25, no. 2 (2021): 202-221.

that may arise related to housing, management responsibilities, and shared facilities. This study will specifically focus on the legal challenges or issues related to the Solo Paragon Apartment and its broader implications, such as consumer protection and regulatory compliance. To achieve the objectives of this legal analysis, it is important to define and interpret the legal framework for apartment housing in Indonesia. This framework includes the necessary permits and regulations that comply with local building codes, zoning plans, and environmental standards. Furthermore, an in-depth analysis of the role of SHMSRS will clarify how this legal instrument is applied in the context of the Solo Paragon Apartment. The operational dynamics of management entities such as PPPSRS reflect the complexity of maintaining a harmonious living environment in mixed-use developments, especially in dealing with tenant issues and ensuring compliance with established regulations. By discussing these topics, we gain valuable insights into the legal landscape that governs the management and ownership of apartments in Indonesia. Ultimately, this contributes to a better understanding of the dynamics of housing in the region.<sup>5</sup>

By examining the specific legal challenges surrounding the Solo Paragon Apartment in depth, important insights are gained regarding the effectiveness of contemporary revolution and its impact on the sustainability of vertical life in Indonesian cities. This observation forms the basis for a broader discussion on urban development policy, consumer rights and the overall development of housing law in the country. Understanding this is very important because Indonesia is increasingly striving to accommodate its urban population growth within limited geographical boundaries. The hope is that this analytical framework will result in a complex relationship between stakeholders in urban residential complexes such as the Solo Paragon Apartment. Understanding the legal aspects of this relationship is essential to

---

<sup>5</sup> Zamil, Yusuf Saepul. "Perlindungan Hukum Pembeli Apartemen Atau Rumah Susun Di Atas Tanah Hak Pengelolaan." *Arena Hukum* 10, no. 3 (2017): 441-461; Wongso, Sinta, Yuhelson Yuhelson, and Bernard Bernard. "Perlindungan Hukum Bagi Penguni Apartemen Terkait Dengan Dualisme Pembentukan Perhimpunan Penghuni Rumah Susun." *Jurnal Multidisiplin Indonesia* 2, no. 8 (2023): 2073-2089.

creating a sustainable urban living environment that meets residents' needs while complying with broader national and local laws. In conclusion, a review of the legal framework surrounding the Solo Paragon Apartment will not only reveal the specific challenges faced by this development, but also contribute to a broader discussion of the extent to which law can be adapted to the complexities of urban development in Indonesia.<sup>6</sup>

This research applies a normative juridical approach, which is a theoretical legal research method that examines library materials or secondary data as the foundation of research. This approach involves a search guided by relevant legal literature and written regulations on the topic discussed. The normative juridical approach aims to conduct an in-depth analysis of the relevant positive legal regulations. This legal research methodology applies systematic steps in the implementation of research. This study uses library research or literature research methods that focus on aspects of legal protection for apartment or condominium consumers.

## **B. Legal Basis of Apartment in Indonesia**

Law Number 20 of 2011 concerning Apartments provides the legal basis for regulating apartments, or condominiums, in Indonesia. Article 1 paragraph 1 defines a condominium as a multi-story building constructed within a structured environment, whose parts have separate individual rights functionally separated from each other, both horizontally and vertically. The specific characteristics of Condominiums are further explained in Article 1 number 2 which states that Apartment Units (Sarusun) are units designed for individual use, with the main purpose as a place of residence. Individual ownership rights over apartment units are recognized through the Certificate of Ownership Rights for Apartment Units (SHMRS), as explained in Article 1 number 3. SHMRS includes individual ownership rights and rights over the interior, common property, and common land, as regulated in Article 1 numbers 4, 5, and 6.

---

<sup>6</sup> Rimardhani, Rakhma. *Pelaksanaan Jual Beli dan Status Kepemilikan Hak Atas Tanah Apartemen di Solo Paragon*. Diss. Universitas Muhammadiyah Surakarta, 2010.

Furthermore, the Apartment Law classifies several types of apartments, including general apartments, special apartments, state apartments, and commercial apartments (Article 1 numbers 7-10). In the context of the Solo Paragon Apartment, the management that combines residential, commercial, and hotel spaces, especially classifies it as a Commercial Flat or mixed-use element. This issue relates to government supervision and regulations, which can vary depending on the specific classification of the apartment complex. Ultimately, this can have implications for ownership, management, and the rights of apartment residents.<sup>7</sup>

In addition to the Condominium Law, there are various Government Regulations (PP) that serve as implementation guidelines. One important regulation is PP Number 13 of 2021 concerning the Administration of Condominiums which replaces PP Number 4 of 1988. This regulatory change is an adjustment of the legal approach towards more modern condominium management, referring to aspects such as land rights, the issuance of SHMSRS, and management by appointed managers. These regulations apply to all types of apartments, including commercial apartments, and therefore can have direct implications for the management of the Solo Paragon Apartment which is included in it.

In addition, PP No. 18 of 2021 which regulates land management rights related to SHMSRS and its registration provides guidelines and provisions for the consolidation of condominium development. This will provide legal clarity for developers and apartment owners and increase transparency regarding the ownership and operation of apartment complexes. In a legal context, the transition from the old PP to the newer PP provides an opportunity to implement stricter and more relevant standards regarding apartment management in the broader social and environmental context in Indonesia, which also applies to complexes such as Solo Paragon.<sup>8</sup>

---

<sup>7</sup> Wongso, Yuhelson, and Bernard. "Perlindungan Hukum Bagi Penguni Apartemen Terkait Dengan Dualisme Pembentukan Perhimpunan Penghuni Rumah Susun."

<sup>8</sup> Maharani, Meisya, Achmad Busro, and Ery Agus Priyono. "Analisis Perbuatan Melawan Hukum (*Tortius Act*) dalam Sengketa Apartemen Mangga Dua Court

At a more specific level, there are several Ministerial Regulations (Permen) which also provide further details regarding the technical and operational aspects of apartment management. Ministry of Public Works Regulation Number 60/PRT/1992 sets the technical requirements for the construction of condominiums which are absolutely necessary to ensure building safety, durability, and habitability. Compliance with these regulations is very important in the context of the Solo Paragon Apartment, especially to reduce the risk of construction violations that can lead to sanctions or legal problems in the future.

Ministry of Public Housing Regulation Number 14 of 2007 regulates the management of primary rental apartments, although it does not directly apply to commercial apartment complexes such as Solo Paragon. The general principles of governance established in the regulation provide a useful basis for understanding how spatial governance and management responsibilities work for the welfare of residents and contribute to the sustainability of housing development in accordance with government standards.<sup>9</sup>

Regional regulations (Perda) also play an important role in regulating apartments at the local level. In Solo, the city where the Solo Paragon Apartment is located, Perda can make specific regulations to adapt national regulations to local situations and needs. Local regulations that may be relevant to the management of apartment complexes include regulations regarding spatial planning, building permits, and site management. For example, the existence of regional regulations regarding the management of large condominiums can provide additional context regarding the provisions or obligations that

---

(Studi Kasus Putusan Mahkamah Agung Nomor 364 PK/Pdt/2016)." *Diponegoro Law Journal* 10, no. 2 (2021): 387-402. See also Taufiq, Fida Nabilah, Mohammad Hamidi Masykur, and Supriyadi Supriyadi. "Challenges Arising from Article 22 (2) of Ministerial Regulation ATR/BPN No. 6/2018 on Complete Systematic Land Registration (PTSL) Pertaining to Insufficient or Missing Evidence of Community Land Ownership." *Unnes Law Journal* 9, no. 2 (2023): 419-440.

<sup>9</sup> Fauzia, Rini. "Pengaruh Pembangunan Apartemen Solo Paragon Terhadap Kondisi Lingkungan Sekitarnya." *Thesis*. Surakarta: Universitas Sebelas Maret, 2010.

must be followed by owners and managers of condominiums to ensure a healthy and prosperous environment is maintained.

It is important to further investigate whether there are regional regulations in Solo that specifically regulate the development, management or establishment of PPPSRS for apartments. This will provide more in-depth information on how local laws adapt to the dynamics of urban development and influence the management and transportation of life in complexes such as Solo Paragon. Of course, this research must consider all aspects of local socio-culture and traditions that can influence management policies and spatial planning.<sup>10</sup> A strong legal foundation, although there is potential for complaints, also offers the opportunity to create a sustainable framework for real estate management in Indonesia. By integrating regulations at the central and regional levels, apartment development can consider the interests of the entire community, such as the rights of owners and residents, as well as the impact on the environment and society. In the context of the Solo Paragon Apartment, the application of these laws and regulations is an effort so that all stakeholders receive fair and equitable protection in the property market.

The application of these regulations can also pose several challenges, especially in the fields of compliance and supervision. The legal framework must be flexible enough to respond to changes in society and the needs of residents, but also strict enough to prevent obstacles or violations that can harm residents or the environment. This poses a challenge for local governments to ensure that every project, such as Solo Paragon, complies with applicable regulations, without ignoring the rights and interests of the local community.

The implications of the licensing status of the Solo Paragon Apartment are very important in understanding the legality of operating this commercial and residential complex. After the construction of Solo Paragon Mall was halted in 2012, accurate information regarding condominium permits is still unclear. The report found that there was no clear detail regarding apartment permits, thus raising important

---

<sup>10</sup> Marpaung, Beny Octofryana Yousca. "Socio-cultural impacts in the formation of urban village." *IOP Conference Series: Materials Science and Engineering*. Vol. 180. No. 1. IOP Publishing, 2017.

questions about legal compliance and governance. To study the legal framework comprehensively, it is necessary to study the specific legal requirements for the development of urban housing in Indonesia. This is particularly important because legal standards continue to change.

Throughout 2025, the main focus of available information has shifted significantly to the actions of the Corruption Eradication Commission (KPK) regarding asset seizures, rather than clarifying the licensing status of the apartment itself. This development requires closer supervision of the licensing process and compliance with relevant laws and regulations regarding the development and management of real estate in Surakarta. Various housing regulations impose specific requirements for certification, operating permits, and building permits. This should be reviewed as part of Solo Paragon's compliance review. The lack of current and accessible permit data creates uncertainty about overall compliance and the legal status of the property. This can affect investor confidence and user stability.

It is very important to obtain a specific status for these permits, especially because the historic decision to halt the construction of the shopping center in 2012 is a sign that deviations from the originally granted permits can occur. By emphasizing transparency in local government, a clearer path can be mapped for future accountability. Based on national and regional urban development regulations, local governments are responsible for maintaining up-to-date records and providing relevant information to the public about ongoing projects, including requirements for building permits, environmental impact assessments, and compliance with zoning.<sup>11</sup>

To obtain an accurate picture of the licensing status, research should be conducted on the current public list of the Surakarta city government. This public data includes tracking valid permits, changes

---

<sup>11</sup> Lesmana, Marsella, and Sri Laksmi Anindita. "Perlindungan Hukum Pembeli Apartemen Terkait Transparansi Informasi Status Hak Atas Tanah Bersama Apartemen: Legal Protection of Apartment Buyers Related to Transparency of Shared Land Rights Status Information." *Reformasi Hukum* 25, no. 2 (2021): 202-221. *See also* Akbar, Fergi Firoso. "Judge Decision Analysis on Civil Cases Against Counterfeiting Land Deed Decision Number 350 K/Pdt/2017 Mataram District Court." *Indonesian Journal of Environmental Law and Sustainable Development* 1, no. 1 (2022): 69-92.

to the initial agreement, and the risk of non-compliance with local regulations that can endanger the legal status of the property. In addition, these steps can stimulate dialogue between stakeholders such as current residents, prospective buyers, and local governments and ensure better communication regarding the structural and legal aspects of real estate ownership and management in Solo Paragon.

The complexity surrounding building permits has become a focus of attention in real estate development regulations in Indonesia, especially regarding its implications for city planning and regional governance. A recent study highlights the importance of regulatory compliance and best practices to promote legitimate housing initiatives. By specifically examining the efforts of local governments in obtaining and enforcing permits, insights can be gained regarding their efficiency and ability to adapt to emerging urban challenges.

The licensing status of the Solo Paragon Apartment shows a clear relationship between legal and operational implications. Researching such data can not only provide clarity on the status of individual apartments, but also indicate how much community involvement is needed to improve regulatory compliance in urban housing projects in Indonesia. Local governments must prioritize the preparation and dissemination of relevant licensing information to ensure compliance, transparency, and smooth communication with stakeholders. This multifaceted approach from legal research, public record reviews, and community conversations can produce significant insights into collaborative practices that encourage legitimate urban housing development.

### **C. Status of Ownership of Subsidized Apartments (SHMSRS) Solo Paragon Apartment**

The concept of SHMSRS (Certificate of Ownership Rights for Condominiums) is very important in the legal framework regarding apartments in Indonesia, especially concerning the determination of individual ownership rights in multi-unit buildings, which allows individuals to maintain ownership not only of their own homes, but also of common areas, including rights to facilities and common land.

This is a strong form of ownership rights that is important for real estate transactions and financing security.

The introduction of SHMSRS creates a comprehensive legal framework in which the rights of homeowners are clearly established. This structured ownership model is particularly important for homeowners in urban areas facing the complexities of city life. By creating a clear separation between private and communal property, SHMSRS emphasizes the importance of maintaining common facilities and services inherent in apartment life. In addition, SHMSRS emphasizes that compliance with condominium regulations and community rules is very important to maintain a cooperative living environment in community ownership developments, which contributes to the stability of the broader community.

The issuance of SHMSRS in Indonesia is regulated by various laws and regulations, indicating that this system is not merely a documentation process but is an important part of protecting ownership rights. Protecting these rights facilitates the formation of effective dispute resolution mechanisms for conflicts between owners and management. This legal structure ensures that buyers and investors have greater confidence in their property investments, especially in busy metropolitan areas such as Solo.

SHMSRS also embodies the important principles of transparency and accountability in real estate management. Local governments have the responsibility to ensure that all project developers comply with the provisions regarding the registration of apartment rights. In this way, they help maintain standards that protect consumer interests. A trusted status for unit buyers creates a positive perception among prospective residents, which ultimately ensures a healthy real estate market in the urban environment.

Understanding the implications of SHMSRS is consistent with the broader goals of urban sustainability and regulatory compliance as cities grow. As the population shifts to urban areas, the need for clear ownership rights becomes increasingly important; ownership must be legally and socially transparent. By laying a solid foundation based on SHMSRS, we encourage a path towards efficient real estate development, respecting individual rights and common interests.

For Solo Paragon, the structure built within the SHMSRS framework is a commentary on the ever-changing urban settlement landscape. By promoting a balanced approach where individual and collective responsibilities coexist, the SHMSRS framework does not only focus on direct ownership rights, but also expands perspectives on the dynamics of community life in densely populated areas. Recent literature and available data indicate that SHMSRS is indeed issued for individual units in Solo Paragon. References to units sold or rented verify ownership based on SHMSRS designation. However, some documents indicate that these units can also be subject to alternative ownership classifications, depending on the underlying land ownership structure. In academic discourse on real estate transactions at Solo Paragon, the duality between ownership rights and rental rights is emphasized. This increases understanding of how SHMSRS works in various units, especially in multi-purpose buildings such as Solo Paragon.

A discussion like this about unit ownership in Solo Paragon contributes to a comprehensive understanding of how property rights work in an urban environment. While most units are under SHMSRS, different legal categories highlight the importance of understanding the details of the land rights behind this classification. By researching how units interact with strata ownership rights and main property ownership, you can gain valuable insights into the complexity involved in navigating various ownership structures.

Scientific research indicates that the launch of SHMSRS together with the real estate management system clearly highlights the unique possibilities of urban housing. By emphasizing the integration of community facilities, residents can seamlessly transition from private ownership to collective management, which is important for overall apartment life efficiency. Structural integrity such as this is particularly relevant in densely populated areas, where the need for clarity and governance effectiveness increases. The presence of SHMSRS in Solo Paragon indicates the potential for engagement with various ownership models involving units structured for hotels, such as condotels. The hybrid nature of these services requires accurate ownership classification so that investors and users can clearly understand the legal landscape.

It is very important for all prospective buyers and stakeholders involved in Solo Paragon to continue receiving information during the SHMSRS issuance process. Although the recognition of ownership rights based on SHMSRS provides significant benefits to investors, understanding the implications associated with this ownership is very important to ensure compliance with local regulations. In addition, community outreach to residents and potential buyers can strengthen community participation in property rights protection regulations.

Therefore, an in-depth understanding of SHMSRS in the context of Solo Paragon becomes important, because it covers ownership structure, allocation of rights, and broader implications of urban life in a high-density environment. The commitment to implementing SHMSRS indicates our true commitment to maintaining real estate integrity and community stability, especially as the real estate industry continues to develop. Obtaining SHMSRS for units in Solo Paragon is very important, because this process determines the path by which ownership rights can be legally established. Information about the specific procedures required to obtain SHMSRS requires further documentation in the available data collection. It is generally considered that the construction process requires the division of buildings into individual units, followed by registration at the land registration office, with the condition of obtaining the required building completion certificate.

This multi-step process forms the basis for verifying ownership rights. Developers usually require these units to be registered separately, thereby facilitating the transfer, sale, and rental of property and creating a more efficient real estate market. It is important for prospective buyers to know this process so they can make the right decisions about their investments. This is especially true in competitive housing markets where ownership clarity is a determining factor in real estate valuation.

Prospective homeowners should also be aware that there are legal consequences associated with the issuance of SHMSRS, such as maintaining common facilities and complying with community management regulations. These rules not only ensure that individual ownership rights are protected, but also encourage active participation in collective practices, which encourage harmonious coexistence among

residents. Recognizing the intrinsic responsibilities that accompany property ownership based on SHMSRS is as important as understanding one's rights.

Although there is some confusion about the procedural steps to obtain SHMSRS at Solo Paragon, evidence of completed registration shows that residents can make legitimate claims to their units. This claim is strengthened by collective rights associated with facilities and common spaces, which in turn involve individual owners in broader community life. Understanding this dynamic has a major impact on the residents' experience as they carry out their roles in a multi-housing environment.

Clarifying the steps required to obtain SHMSRS at Solo Paragon will help avoid potential misunderstandings and conflicts among current residents. Compliance with the regulatory framework encourages effective housing governance, where individual and collective interests align. A better understanding of this process will greatly assist in protecting owners' investments and improving overall living conditions by facilitating legitimate ownership transfers through efficient channels.

While current information emphasizes the availability of SHMSRS for Solo Paragon units, more detailed documentation of the process for obtaining this certificate will allow stakeholders to clearly and confidently understand their ownership rights. This paper highlights the importance of institutional support in defining property rights and responsibilities in a complex urban landscape. This ensures that every owner in the Solo Paragon community can thrive within a regulatory framework designed to encourage collaboration and stability.<sup>12</sup>

## D. Conclusion

In the dispute between residents and the management of the Solo Paragon Apartment, it was found that the position of consumers as the weaker party has not received optimal legal protection. The dispute began with the restriction of facility access by the manager to the

---

<sup>12</sup> Prasetya, Andreas Hendri Eka Yogi. *Perencanaan Apartemen Solo Paragon*. Diss. UAJY, 2009.

residents, which was considered contrary to the principle of justice and the provisions in the Consumer Protection Law. The manager is considered to have violated the rights of residents as consumers who have purchased apartment units and have rights to the use of common facilities. This research reveals that the form of legal protection for apartment residents still depends on the courage and fighting power of the residents in pursuing legal efforts, such as filing a lawsuit to the court. Although the Panel of Judges finally decided that the manager's actions were contrary to the law and ordered the restoration of residents' rights, this case shows a gap in the implementation of legal protection that should be more proactive. In addition, there are weaknesses in the regulation and supervision of apartment managers, which allow deviations in management practices to arise. It is necessary to strengthen regulations and form independent supervisory institutions to ensure the fulfillment of residents' rights. Legal protection must not only be present in a normative form, but must also be preventive and repressive in its implementation.

## E. References

- Akbar, Fergi Firosa. "Judge Decision Analysis on Civil Cases Against Counterfeiting Land Deed Decision Number 350 K/Pdt/2017 Mataram District Court." *Indonesian Journal of Environmental Law and Sustainable Development* 1, no. 1 (2022): 69-92.
- Fauzia, Rini. "Pengaruh Pembangunan Apartemen Solo Paragon Terhadap Kondisi Lingkungan Sekitarnya." *Thesis*. Surakarta: Universitas Sebelas Maret, 2010.
- Lesmana, Marsella, and Sri Laksmi Anindita. "Perlindungan Hukum Pembeli Apartemen Terkait Transparansi Informasi Status Hak Atas Tanah Bersama Apartemen: Legal Protection of Apartment Buyers Related to Transparency of Shared Land Rights Status Information." *Reformasi Hukum* 25, no. 2 (2021): 202-221.
- Maharani, Meisya, Achmad Busro, and Ery Agus Priyono. "Analisis Perbuatan Melawan Hukum (*Tortius Act*) dalam Sengketa Apartemen Mangga Dua Court (Studi Kasus Putusan Mahkamah

- Agung Nomor 364 PK/Pdt/2016)." *Diponegoro Law Journal* 10, no. 2 (2021): 387-402.
- Marpaung, Beny Octofryana Yousca. "Socio-cultural impacts in the formation of urban village." *IOP Conference Series: Materials Science and Engineering*. Vol. 180. No. 1. IOP Publishing, 2017.
- Martin, Abraham Yazdi, et al. "The development concept of law certainty on the building cadastral toward the rights of ownership on the strata title rights based on property law in Indonesia." *International E-Journal of Advances in Social Sciences* 5, no. 14 (2019): 956-966.
- Prasetya, Andreas Hendri Eka Yogi. *Perencanaan Apartemen Solo Paragon*. Diss. UAJY, 2009.
- Rimardhani, Rakhma. *Pelaksanaan Jual Beli dan Status Kepemilikan Hak Atas Tanah Apartemen di Solo Paragon*. Diss. Universitas Muhammadiyah Surakarta, 2010.
- Saputri, Elsa Mellinda, Waspih Waspih, and Ridwan Arifin. "Perlindungan Hukum Terhadap Konsumen dalam Hal Pengembang (Developer) Apartemen Dinyatakan Pailit." *Jurnal Hukum Bisnis Bonum Commune* 2, no. 2 (2019): 151.
- Setiawati, Anda. "Shifting the Concept of Flats Ownership in Indonesia." *3rd Borobudur International Symposium on Humanities and Social Science 2021 (BIS-HSS 2021)*. Atlantis Press, 2022.
- Taufiq, Fida Nabilah, Mohammad Hamidi Masykur, and Supriyadi Supriyadi. "Challenges Arising from Article 22 (2) of Ministerial Regulation ATR/BPN No. 6/2018 on Complete Systematic Land Registration (PTSL) Pertaining to Insufficient or Missing Evidence of Community Land Ownership." *Unnes Law Journal* 9, no. 2 (2023): 419-440.
- Wongso, Sinta, Yuhelson Yuhelson, and Bernard Bernard. "Perlindungan Hukum Bagi Penguni Apartemen Terkait Dengan Dualisme Pembentukan Perhimpunan Penghuni Rumah Susun." *Jurnal Multidisiplin Indonesia* 2, no. 8 (2023): 2073-2089.

- Yuniyanti, Salma Suroyya. "The philosophical foundation of the coherence of regulations concerning apartment in Indonesia." *Journal of Morality and Legal Culture* 1, no. 1 (2020): 18-23.
- Zamil, Yusuf Saepul. "Perlindungan Hukum Pembeli Apartemen Atau Rumah Susun Di Atas Tanah Hak Pengelolaan." *Arena Hukum* 10, no. 3 (2017): 441-461.

\*\*\*

### Acknowledgment

None

### Funding Information

None

### Conflicting Interest Statement

The authors state that there is no conflict of interest in the publication of this article.

### Publishing Ethical and Originality Statement

All authors declared that this work is original and has never been published in any form and in any media, nor is it under consideration for publication in any journal, and all sources cited in this work refer to the basic standards of scientific citation.

### Generative AI Statement

In this paper, authors emphasize the importance of acknowledging AI usage to maintain ethical standards. Clearly attributing authorship ensures transparency, fostering responsible AI integration. This approach safeguards the integrity of both the creative process and the final output, encouraging accountability while respecting the contributions of human creators and AI technologies.