



Legal Analysis of Marriage Annulment Due to Identity Forgery in Mixed Marriages (Case Study of Karawang Religious Court Decision Number 3465/Pdt.G/2024/Pa.Krw)

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Abstract: The present study examines the legal implications of the dissolution of marriages that have been caused by the fraudulent misrepresentation of identity in the context of mixed marriages, with a particular focus on the analysis of the Court of Religious Affairs in Karawang's decision number 3465/Pdt.G/2024/PA.Krw. The objective of this study is to examine the legal implications and consequences of the dissolution of marriage. The research methodology employed is of a juridical-normative nature, encompassing both an empirical and a theoretical dimension. The present study's findings suggest that marital unions founded upon false identities, as exemplified by the utilization of pseudonyms and the fabrication of citizenship status by one party, do not satisfy the criteria for legality as outlined in Law Number 1 of 1974 concerning Marriage. The dissolution of the marriage in question results in the non-recognition of the marital status and joint assets of the couple. However, the ruling affirmed the legitimacy of the offspring from the aforementioned marriage for the purpose of safeguarding their legal rights. The present study underscores the pivotal role of administrative integrity and transparency in the documentation of mixed marriages, in conjunction with the proactive involvement of state officials in the prevention of any transgressions during the matrimonial process. Data certainly leads to transparency and minimizes the potential for fraud in the 2024 elections.

Keywords: Marriage Annulment, Identity Forgery, Mixed Marriage, Civil Law, Islamic Law

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1. Introduction

Etymologically, marriage comes from the word "marriage" which means forming a family between a man and a woman, and includes sexual relations.(Prayogi & Jauhari, 2021),(Li'umah, 2024). In Arabic, the meaning used is an-nikah, which literally means union, sexual intercourse. According to Article 1 of the 1974 Marriage Law, it states that, "Marriage is a physical and spiritual bond between a man and a woman as husband and wife with the aim of forming a happy and eternal family (household) based on the One Almighty God."(Munawar, 2015),(Waluyo, 2020).

In the KHI, marriage is seen as a strong contract based on a vow to obey Allah's instructions, so that its implementation is a form of worship.(Hasibuan, Hasibuan, & Nasution, 2025),(Nely, 2024).

In order for a marriage to be considered valid, a series of conditions outlined in statutory regulations must be met.(RELIGION, nd),(Kholik, 2019). This has been regulated in Law No. 1 of 1974. Which includes: (a) There is an agreement from the prospective bride and groom; (b) There is permission from parents or guardians; (c) The minimum age for both prospective bride and groom is 19 years; (d) There is no blood relationship or family that is prohibited by law from marrying; (e) Both parties who will

marry are not currently bound by marriage to another person; (f) If the couple has been married, divorced, and plans to remarry, their religion or beliefs do not prohibit marriage for the third time; (g) For the prospective bride, she is not undergoing a waiting period (*idrah*) after a divorce or the death of her husband (Damayanti, 2023), (Purwoto et al., 2023).

For every individual who wants to get married, it is mandatory to check the completeness of the marriage requirements with the marriage registrar at the location where the wedding will be held. (Setianingsih, Purwanto, & Syarifah, 2024), (Hidayatulloh & Irsyadah, 2022). Marriage Registrar Officers (PPN) are obliged to carry out examinations regarding whether or not there are obstacles in the implementation of marriage, both obstacles caused by violations of the *Munakahat* law and violations of the provisions of marriage regulations. (Effendi, 2020), (Kusna, 2023).

Therefore, in the pre-marriage examination process, it is necessary to verify documents such as birth certificate extracts or birth certificates from prospective brides and grooms, accompanied by personal identity which includes marital status, age and religion. (Husni & Lendrawati, 2023), (Suryaningsih & Hayati, 2023). The Marriage Registrar is obliged to carry out checks on the prospective husband and the marriage guardian, and then the results of the checks are written down in a list which is then submitted to the authorized Marriage Registrar. The purpose and objective is to protect the institution of marriage which has an important and strategic meaning in society from various detrimental actions from irresponsible parties. (Kosasih & SH, 2021), (Wahdaniah et al., 2024).

KBBI defines "forgery" as rooted in the word "fake" meaning not original, which applies to items such as diplomas, certificates, and currency. Forgery is defined as an action, process, or method to make something that is not original, while "forger" means a person who carries out the action. (Mawaddah, Haikal, Saputra, Akbar, & Efendi, 2023), . Forgery is stated in the articles of the Civil Code related to agreements, according to Wirjono Prodjodikoro "Fraud in civil law does not need to be in the form of oral lies, but can also be in the form of providing misleading information or using a false identity in making an agreement." Regarding this, it can be seen in Article 1321 of the Civil Code which states "No agreement has any force if it is given due to error or obtained by coercion or fraud." The fraud in question occurs when one party manipulates to make an agreement. Forgery or fraud that misleads one of the parties in a marriage can cause the marriage to be annulled due to the absence of consent given voluntarily and honestly from the deceived party. Forgery of marriage is not only falsifying age or status, but falsifying citizenship is also included in it.

In this mixed marriage, there is no escape from fraud, one of which is identity falsification. Identity falsification in the context of this mixed marriage is a phenomenon that is very detrimental not only to the parties involved but also to the state in population administration and law enforcement.

One case that reflects this problem is Put. PA Karawang No. 3465/Pdt.G/2024/PA.Krw. This case began when Prasetyo and Aning Wahyuning Asih were married on August 28, 2015, which was officially recorded at the Religious Affairs Office of West Karawang District. After several years had passed, in July 2024, the Head

of the West Karawang KUA received a warning from the Karawang Immigration Office that Aning Wahyuning Asih had two different identities, by being summoned to the Karawang Immigration Office, he felt disadvantaged by the falsification of identity carried out by Aning Wahyuning Asih. After trying to find out the truth from Aning's own husband, Prasetyo, he finally admitted that his wife Aning Wahyuning Asih was a foreigner with Philippine citizenship. In the trial process, it was discovered that the identity falsification was carried out by Prasetyo's biological father to facilitate the marriage between Aning Wahyuning Asih and Prasetyo by creating documents for marriage requirements and a fictitious marriage guardian. The panel of judges opined that the marriage between the two was a mixed marriage, but not in accordance with what has been regulated in the applicable laws and regulations. In addition, the marriage guardian was not an authorized guardian, in Article 20 paragraph (2) of the KHI, it is explained that "marriage guardians consist of lineage guardians and judge guardians". Based on these considerations, the panel of judges decided that the marriage between Prasetyo and Aning Waningsih was annulled, and had no legal force Marriage Certificate Book Number: 0780/122/VII/2015.

Therefore, the author is interested in conducting research on "Legal Analysis of Marriage Annulment Due to Identity Falsification in Mixed Marriages (Case Study of Karawang Religious Court Decision Number 3465/Pdt.G/Pa.Krw)".

2. Materials and Methods

Normative legal research, also known as doctrinal legal research or literature-based legal studies, focuses on the analysis of legal principles, norms, applicable regulations, and structures in the legal system. Through a review of judges' decisions that have formed jurisprudence, the scope of the normative legal approach can be understood more comprehensively. Next, the main objectives of this normative legal research will be explained. This research is included in the type of development research, namely research that aims to identify and develop a legal problem. The primary data in this analysis is Put.PA Karawang Number 3465 / Pdt.G / 2024 / PA.Krw, supported by Law Number 1 of 1974 concerning Marriage (and its amendments) and the Compilation of Islamic Law (KHI). To sharpen the analysis, two complementary approaches are used. First, the statute approach to examine the legal framework governing the annulment of marriage. Second, the case approach to conduct an in-depth study of the court decisions that are the object of study. All collected data was analyzed descriptively qualitatively in order to draw conclusions on the legal issues studied.

3. Results and Discussion

3.1 Legal Provisions Regarding Annulment of Marriage in Mixed Marriages in Indonesia

In Indonesia itself, inter-national marriages are often referred to as mixed marriages, because there are foreign elements in the marriage. Provisions for marriages containing foreign elements This is regulated in Article 57 of the Marriage Law. In practice, the implementation of mixed marriages does not merely involve administrative

registration, but also concerns the integration of national legal norms, religious norms, and foreign legal systems if one of the parties is a foreign citizen (WNA).

The implementation of mixed marriages in Indonesia requires the fulfillment of a number of important requirements. In addition to valid proof of identity and a certificate from the embassy or country of origin, supporting documents are also required, such as a passport, marriage license, and legal recognition from a marriage registration institution, especially the KUA for Muslims or the Civil Registry Office for non-Muslims. Fulfillment of these documents is the basis for ensuring that the marriage is carried out legally, without coercion, and meets the elements of legality according to the rules derived from religion and state law.

Citizens who will later marry a partner of different citizenship are required to fulfill a number of requirements, including a certificate of fulfillment of marriage requirements from the embassy or country of origin, a passport, and an oath. These requirements are needed so that the marriage certificate extract can be issued legally. Thus, the marriage bond in the context of civil law has been clearly regulated in Law No. 1 of 1974 concerning Marriage. This aims to provide legal protection and legal certainty for Indonesian citizens. If the marriage occurs in the territory of Indonesia, then its implementation must follow the provisions of the Marriage Law.

A marriage can be dissolved or annulled if it meets the requirements set out in the marriage law. This provision also applies to legal subjects who are Indonesian citizens who embrace Islam. Article 38 of the Marriage Law states that a marriage can be terminated if there are several reasons, namely:

a. Death

In this case, there is no need for debate or proof process in court, because the death of a spouse automatically ends the marriage bond. With the death of one party, the marriage relationship between husband and wife ends legally. Especially for wives whose husbands have died, an iddah period of four months and ten days applies as part of the provisions of Islamic law.

b. Divorce

Divorce in the context of Islamic law can be interpreted as a separation between husband and wife that occurs through two mechanisms, namely talaq and divorce lawsuit. Talaq divorce is the process of dissolving a marriage relationship requested by the husband, while sued divorce is a request to end the marriage bond filed by the wife. Both forms of divorce can only be handled and resolved through a trial in the Religious Court. From an Islamic perspective, there are several actions that can damage the bonds of marriage. While annulment, which means considering a marriage invalid or as if it had never happened, is a legal concept that states that the marriage is null and void.

c. Court ruling

The end of a marriage certainly does not happen without a clear reason. There are various factors that can cause damage to a household. Divorce should not be done

without a strong basis and should only be used as a last resort in resolving marital conflicts. The divorce process in the Religious Court aims to create a peaceful, safe, orderly, and prosperous atmosphere for all parties. Judges in the Religious Court have an important role in receiving, analyzing, and trying divorce cases in the hope of restoring harmony and affection between disputing couples. In essence, marriage is the main foundation in social life and is an important element in creating a harmonious and balanced society.

Annulment of marriage is also included in the results of the end of marriage by court decision. The application to annul the marriage is submitted through the Religious Court which has the authority according to the jurisdiction where the marriage took place or the domicile of the parties. Zainuddin Ali explained that annulment of marriage is the elimination of the status of a husband and wife relationship that is carried out after the marriage contract is carried out. Court decisions regarding annulment of marriage require in-depth and careful consideration from the judge examining the case. This is important so that the decision can be a reference for other judges in similar cases, so that strong jurisprudence is formed. This kind of pattern is very much needed, considering that laws and regulations do not always regulate in detail or explicitly every legal problem, so that judges have an important role in filling the gaps or ambiguities in the law through proportional and contextual decisions.

The provisions for annulment of marriage in Indonesia are expressly regulated in Law No. 1 of 1974 concerning Marriage. Article 23 expressly mentions five groups who are legally authorized to file a request for annulment of marriage.

First, families in the direct line of the husband or wife, such as parents, can file an application if there is a violation of the requirements for a valid marriage, such as age that has not met the requirements, no consent from a guardian, or indications of coercion. The family has legal standing because the status and continuation of their child's marriage also have a direct impact on the honor and social structure of the family.

Second, the husband or wife themselves have the right to file for annulment if after the marriage it is discovered that there are elements of fraud, concealment of identity, dual marriage status, or coercion in the implementation process. This right is important to protect the principles of freedom and honesty that are the basis for the validity of a marriage.

Third, the marriage registrar, both from the KUA and the Civil Registry Office, has the authority to file for annulment of marriage provided that there is no court decision that has permanent legal force. This authority is given to uphold the integrity and validity of marriage registration.

Fourth, an official specifically appointed in Article 16 paragraph (2) of the marriage law. This official has a supervisory function in the implementation of marriage and has the authority to file an annulment if he finds any legal inconsistencies in the process or documents used.

Fifth, third parties who have a direct legal interest in the marriage, such as in terms of inheritance status, child status, or citizenship rights. However, this right can only be exercised after the marriage has been decided first by the court. This aims to prevent

abuse of authority and ensure that only parties who are truly legally interested can submit the application.

In the context of mixed marriages, it is important for all parties involved—both families, couples, and state officials—to understand that the annulment of a marriage is not merely a personal matter, but concerns broader legal interests. This becomes even more crucial when fake identities or administrative manipulation are used to facilitate cross-border marriages, which can then impact citizenship status, the legitimacy of children, and the legality of other civil documents. Annulment becomes an important legal mechanism to restore the situation to be in accordance with the principles of legality, honesty, and protection of citizens.

Based on the cases explained previously, it can be concluded that identity falsification has the potential to cause the annulment of a marriage. Termination or cancellation of a marriage is not the same as the cancellation of a regular agreement that has been previously regulated in a contract. In a regular agreement, the parties have the freedom to determine the content and form of the agreement. However, in marriage, the content and form of the relationship have been applied by existing law and cannot be changed unilaterally. In addition, a regular agreement usually has a certain period of time and ends after the goal is achieved or the validity period expires. Unlike marriage, it is eternal without a time limit, unless there are reasons beyond the will of the parties that cause the marriage to end, such as through divorce or annulment of marriage. In the Karawang PA Decision No. 3465 / Pdt.G / 2024 / PA.Krw also stated that one of the reasons for the annulment of the marriage was because the wife, a foreigner with Philippine citizenship, namely Serafica Arlene Jovellanos, falsified her name by claiming to be an Indonesian citizen named Aning Wahyuning Asih, which fulfilled the requirements for the annulment of her marriage.

3.2 PTUN Legal Consequences Regarding Marriage Annulment in Mixed Marriages in Indonesia

Legal protection is always closely related to the rights and obligations inherent in legal subjects. Before discussing further the legal consequences of annulment of marriage, it is important to first understand the legal consequences arising from a valid marriage. As regulated in Article 2 of the Marriage Law, "a marriage is declared valid if it is carried out according to the laws of each religion and belief of the parties, and is recorded according to the provisions of applicable laws and regulations". This valid marriage will later have legal consequences for the husband, wife, and children, especially those related to their legal status, the arrangement of joint property, and the relationship between children and parents, including the aspect of guardianship.

a. Rights and Obligations of Husband and Wife.

Rights and obligations are fully regulated in Law Number 1 of 1974 concerning Marriage, especially Chapter VI Articles 30 to 34. Article 30 emphasizes that "husband and wife have a great responsibility to build and maintain the household as a pillar of social order."

This provision shows that in terms of carrying out legal acts, the position of husband and wife is equal. However, in the civil context, if for some reason a wife does not obtain permission from her husband to carry out a legal act, then the court has the authority to grant such permission so that the wife can still carry out the legal act in question.

The affirmation of the husband's position as head of the family is a positive legal construction of Indonesia, which is not explicitly found in the customary law system or Islamic law. According to Prodjodikoro as quoted by Lili Rasjidi, the husband's position as head of the household is not explicitly formulated in the two legal systems, but is part of the norms affirmed by national legislation.

The provisions regarding the husband and wife's residence are regulated in Article 32, which states: (a) The husband and wife are obliged to determine a permanent residence; (b) The residence must be agreed to by both parties. What is meant by residence in this article is a house which is a place of shared shelter, which can be inhabited by husband, wife and their descendants. In addition, Article 33 stipulates that "husband and wife must love, respect, be faithful to each other, and provide each other with physical and spiritual support." Article 34 stipulates that the husband is obliged to protect his wife and fulfill the needs of the household according to his ability. Therefore, women are tasked with managing household responsibilities efficiently." If one party shows negligence in fulfilling legal obligations within the family, then the injured party has the right to file a lawsuit with the competent court.

b. Regarding Marital Property

Joint property is divided into 2 types, namely joint property and inherited property. Marital property or joint property according to Article 35 of the Marriage Law is "property obtained during the marriage. While inherited property is property brought by each husband and wife, either as a gift or inheritance, under their control, unless the parties agree otherwise". In terms of marital property, each spouse can act with the consent of their spouse. Meanwhile, the property of each husband and wife has complete legal rights (Article 36). In the event of a divorce, the division of joint property is regulated by certain laws. The related laws include religious law, customary law, and additional legal frameworks.

c. Regarding the Position of Children

Children are individuals who are legally not yet adults and are still in a development phase that requires guidance and supervision from parents, family, and the surrounding environment. In this context, the state has an important role and is responsible for providing protection to children from various forms of threats that can endanger their future. This protection includes aspects of security, welfare, fulfillment of basic rights, and all aspects related to the process of optimal child growth and development. Parenting greatly influences child development. However, external factors such as the social and cultural environment also contribute greatly to shaping children's mindsets, especially when they enter adulthood. Children will eventually become

individuals who are responsible for their own lives, so that appropriate protection and education from an early age are crucial factors in preparing them for the future.

d. Regarding the Rights & Obligations of Parents and Children

Parents have the primary responsibility to care for their children and have special rights related to their children. Although parental rights are not specifically defined in laws and regulations, these rights are normatively considered to be reflected in the obligations of children to their parents. This understanding is implicitly stated in Article 46 paragraph (1) which states that "children are obliged to respect their parents and obey their reasonable wishes." This provision implies that parents have the right to receive respect and obedience from their children as a form of devotion and appreciation for their role.

Furthermore, in paragraph (2) of the same article it is explained that "if the child has grown up, he is obliged to maintain, according to his ability, both parents and their family in a straight line upwards, if they need his help." Based on these provisions, it can be concluded that parents have the right to receive maintenance and care from their adult children, according to the ability of each child. This right arises as a logical consequence of the mutually beneficial relationship between parents and children in the family order regulated by positive law in Indonesia. In the relationship between parents and children, there are a number of obligations that arise as a manifestation of the principle of obedience and reciprocal responsibility. Normatively, the rights held by parents are basically obligations that must be fulfilled by children, while the rights of children are obligations inherent in the role of parents. This relationship is complementary and reflects the balance between parental authority and the need for protection and fulfillment of children's rights within a harmonious family framework.

The implications of annulling a marriage require consideration of the provisions regarding the commencement of the annulment, as regulated in Article 28 paragraph (1) of the Marriage Law, which states:

"The annulment of marriage begins when the court decision has permanent legal force and is valid from the time the marriage occurs." The annulment of marriage is valid from the time the court decision has permanent legal force and is valid from the time the marriage occurs.

a. Regarding the Position and Rights of Children

In the context of annulment of marriage, the protection of children's rights is a primary concern. Based on the provisions of Article 28 paragraph (2) letter (a), the legal status of a child born in a marriage is not affected by the annulment of his/her parents' marriage. This means that the annulment does not have a retroactive effect on the child. This is reinforced by the provisions in Articles 75 and 76 of the KHI which emphasize that "the child is still considered a legitimate child according to law. Thus, annulment of marriage does not eliminate the legal relationship between the child and both parents. Even though the marriage has been declared null and void by law based on a court

decision, both parents still have the responsibility to properly care for, guide, and educate their children in accordance with applicable legal provisions."

This condition occurs because marriage is an institution that must be based on the provisions of the applicable law. Viewed from a civil law perspective, marriage provides a guarantee of legal protection for all parties involved, including husband, wife, children, and other parties outside the nuclear family. As a form of legal action, marriage creates legal consequences that are indeed desired by the parties who carry it out.

Based on the provisions of Article 42, it is stated that "a legitimate child is a child born in or as a result of a legitimate marriage". The validity of a marriage greatly influences the legal consequences that arise, including the legal status and guarantees for family members, as well as the assets obtained during the marriage. Given that the legal consequences of marriage are closely related to the status of the child along with the rights and obligations of each party, the fulfillment of the requirements and pillars based on the rules in Law Number 1 of 1974 and the KHI is an absolute must for prospective husbands and wives. Therefore, the rules set by state institutions or those that develop in society will function optimally in realizing order and justice. When a marriage is annulled, this does not have a retroactive effect on the legal status of the child. The status of the child is maintained as a legitimate child by law, while the legal bond between the child and his father and mother continues without interruption. Basically, even though the court has annulled the marriage of both parents, the annulment decision has no impact at all on the legal position or rights of the child born from that marriage.

b. Regarding Joint Property

The division of joint assets (PHB) in the context of annulment of marriage is different from PHB when the marriage ends due to divorce. Article 28 paragraph (2) letter b of Law No. 1 1974 states that "the decision to annul a marriage does not apply retroactively to a husband and wife who act in good faith, except for joint assets if the annulment is based on a previous marriage". Thus, although the annulment of marriage does not have retroactive effects on a husband and wife who act in good faith, there are special provisions regarding PHB obtained during the marriage. After the annulment of marriage, each party has the right to obtain part of the joint assets under their control. If the annulment of marriage is based on bad faith or because one of the parties is still bound by a previous marriage, then the right to joint assets will not be recognized.

c. Regarding Husband and Wife Relationships

When the marriage has been annulled and has permanent legal force. This means that even though they physically live together as husband and wife, legally the relationship never existed. This is different from a regular divorce, where previously there was a legal husband and wife bond. In cases of annulment like this, the husband and wife relationship is legally completely terminated since the decision has permanent legal force.

In Islamic law, a woman whose marriage is annulled must still undergo an iddah period (waiting period before being allowed to remarry). This is done to ensure that

there is no pregnancy that could cause problems with lineage. However, according to experts such as Thalib, a woman whose marriage is annulled is not entitled to maintenance from her ex-partner, because an annulled marriage is considered invalid, and an invalid contract does not create an obligation for maintenance.

In the case that has been described previously, it is known that the couple Prasetyo and Aning Wahyuningsih Asih entered into a marriage based on bad faith, because they had falsified their citizenship identity which was a requirement for the marriage to be valid, this was discovered when the head of the KUA office received a warning from the Karawang Regency Immigration Office. The judge decided that their marriage was a mixed marriage; however, the judge did not comply with the provisions contained in Articles 57 to 62 of the Marriage Law. As a result, the Joint Property obtained during the marriage was considered not legally recognized, resulting in the annulment of the marriage. However, the judge still recognized the existence of descendants from the marriage.

4. Conclusions

Marriage is a sacred bond that is designed to last a lifetime. However, in reality, not every marriage can go as desired. Law No. 1 of 1974 concerning Marriage stipulates that a marriage can end for three main reasons: death, divorce, and court decision. Death is a natural event that explicitly terminates a marriage. Divorce, whether filed through a divorce lawsuit or a civil lawsuit, is a termination of legal relations that must be filed and decided by the Religious Court. A court decision is the last legal recourse when deliberation for consensus cannot be reached in a household dispute. Annulment of marriage is a legal procedure that legitimizes a void marriage due to failure to meet applicable legal standards. The provisions regarding this annulment are clearly stated in Law Number 1 of 1974 concerning Marriage, which has been revised by Law Number 16 of 2019 within the framework of Indonesian positive law. Article 22 of the Marriage Law provides a legal basis for annulment of marriage if the parties do not meet the criteria for a valid marriage bond. An application for annulment may be submitted by certain parties as referred to in Article 23 and Article 24, including direct descendants, one of the spouses, and third parties who have a direct legal interest. An application for annulment of marriage is submitted to the appropriate PA based on the position or location of the marriage ceremony. In mixed marriages, annulment of marriage is regulated by the provisions of Article 60 paragraph (1) which mandates the fulfillment of the national legal requirements of each party.

Under Indonesian law, a valid marriage results in legal consequences for the husband, wife, descendants, and joint property. A husband and wife obtain the same rights and responsibilities, including family leadership, domicile, and provision of household needs. Property is categorized as joint property and inheritance. In addition, children born from a valid marriage are entitled to comprehensive legal protection, including the right to be cared for and raised by their parents. Annulment of marriage has different legal consequences than divorce. According to Article 28 of the Marriage Law, annulment of marriage is effective from the time the marriage is conducted and directly affects the relationship between husband and wife and their joint property. However, annulment of marriage does not retrospectively affect the status of the child, as regulated in Article 28 paragraph (2) letter a and further supported by the KHI rules. Children are considered legitimate descendants, so that the legal bond between the child and their parents is fully recognized. Annulment of marriage allows for the division of joint property, if both par-

ties act in good faith. However, if the annulment is due to a previous marriage or identity fraud, the existence of joint property is not legally recognized. As a result, the marriage relationship is declared to have no legal force since the annulment decision has permanent legal force. Based on Islamic law, a wife is required to undergo an iddah period but is not entitled to maintenance, because the annulment of the marriage is considered invalid from the start. The case involving Prasetyo and Aning Wahyuningsih Asih is an example of how the annulment of a marriage based on falsification of citizenship identity in a mixed marriage has an impact on the non-recognition of assets obtained during the marriage, but still guarantees legal protection for children born from the marriage. This confirms that legal protection for children remains a priority, even though the marriage of both parents has been annulled by the court.

Pembatalan pernikahan akibat pemalsuan identitas dalam perkawinan campuran menunjukkan pentingnya reformasi administratif dan pengawasan hukum yang lebih ketat dalam proses pernikahan. Untuk itu, diperlukan digitalisasi sistem pencatatan dan validasi dokumen lintas instansi serta penguatan kapasitas petugas lapangan. Secara yuridis, pembatalan berdampak pada hilangnya status hukum pasangan WNA, pembatalan dokumen turunan, dan potensi sanksi keimigrasian, sementara anak tetap dijamin sebagai subjek hukum yang sah. Implikasi sosial dari kasus ini menekankan perlunya kebijakan protektif dan edukatif agar lembaga pernikahan tidak menjadi sarana manipulasi hukum, serta memastikan bahwa keadilan substantif tetap diberikan bagi semua pihak yang terlibat secara jujur dan beritikad baik.

The annulment of marriages due to identity forgery in mixed marriages shows the importance of administrative reform and stricter legal supervision in the marriage process. This requires digitizing the recording system and validating documents across agencies as well as strengthening the capacity of field officers. Juridically, annulment results in the loss of legal status of the foreign spouse, annulment of derivative documents, and potential immigration sanctions, while the child remains guaranteed as a legal subject. The social implications of this case emphasize the need for protective and educative policies to prevent the institution of marriage from becoming a means of legal manipulation, as well as ensuring that substantive justice is still provided for all parties involved honestly and in good faith.

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