

Analysis Of Cancellation Of Land Rights Certificates In Certificate Overlapping Cases

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Abstract.

This study aims to determine and analyze how the cancellation of a land title certificate due to an overlapping certificate. This case study examines Mataram State Administrative Court Decision No.54/G/2022/PTUN.MTR Jo. State Administrative High Court Decision No.25/B/2023/PTUN.MTR uses the perspective of equitable legal certainty to find out and analyze the overlapping problems that are still often encountered in Indonesia. The problem of the research is the background of the occurrence of an overlapping certificate in Decision No.54/G/2022/PTUN.MTR and what implications arise against the disputed object land. The research method used is normative legal research using a case approach and using primary legal materials including Decision No.54/G/2022/PTUN.MTR on the occurrence of an overlapping certificate. The result of this research is that the certificate issued by the National Land Agency has been deemed defective and must be canceled so as not to harm the Plaintiff as the legitimate holder of the Certificate of Ownership with evidence in the form of a Sale and Purchase Letter between the Plaintiff's parents and the Defendant's parents.

Keywords: *Overlapping, Cancellation, and Certificate of Title.*

I. INTRODUCTION

In Indonesia, a country governed by laws, every aspect of daily life is regulated. The actions of the community are bound by laws, and as such, every action taken carries legal consequences. It is imperative for the public to comprehend that their actions will have repercussions in accordance with the law. The legal concept of "land" refers to the earth's surface, as defined in Article 1 of the 1960 Agrarian Principles Law. Land is pivotal to human life, representing the primary form of capital, and in most of Indonesia, the sole capital. This emphasizes the close and essential relationship between humans and land, as land predates human existence and is indispensable for human life to thrive. Land holds significant social symbolism in society where ownership represents honor, pride, personal success, and economic, social, and cultural value. It becomes a source of life and identity, signifying rights to honor and dignity for its owners. Therefore, land registration arrangements are necessary to establish ownership rights over the land. The topic of land issues is always intriguing to discuss because every aspect of human life is interconnected with land. Land serves as the cornerstone for human existence and provides livelihood, and even in death, our connection to the land persists. Similar to the regulation of land ownership in Indonesia, it is also governed by Indonesian law. Many Indonesians are not fully aware of the significance of land ownership for housing and other purposes, leading to various issues related to land ownership. Therefore, in the author's thesis, there is a desire to provide a more comprehensive explanation of the challenges associated with land ownership, aiming to help readers understand its importance in daily life.

Land ownership can be acquired through various methods. The first is by way of transfer, where the right to buy and sell land can be transferred from one person to another. The second method is through statutory provisions, including customary laws and government regulations. In the specific case being examined in the thesis, land ownership can be obtained through the use of a fraudulent grant deed. Government Regulation no. 24 of 1997 addresses Land Registration. In Chapter 1, Article 1, Paragraph 1, it is stated that land registration involves a continuous series of activities conducted by the government, encompassing the collection, management, bookkeeping, and maintenance of both physical and juridical data in the form of maps and lists related to land parcels, apartment units, and associated rights. Moreover, the regulation explains in Articles 3 and 4 that the primary purposes of land registration include providing legal

certainty and protection to rights holders, offering information to interested parties, facilitating orderly land administration, issuing land rights certificates, making data open to the public, and ensuring the registration of all land transfers and ownership rights. Land rights refer to the right to use the land exclusively, excluding other elements on the land such as mineral resources and oil. This is specifically governed by various regulations, particularly the law concerning Basic Mining Provisions.

By granting rights to the land, a legal relationship is established. With the principle options intended to ensure the realization of these goals, Combined with several other concrete factors, including the challenging economic conditions faced by the middle and lower classes, this has led to the emergence of different kinds of irregularities, such as the creation of fraudulent grant deeds to illegally transfer land title certificates from one person to another. On the one hand, the UUPA wants to encourage the progress of the agricultural and industrial economies by giving individual land rights to each person or company on a large scale and requiring them to produce optimally. However, on the other hand, UUPA tries to prevent negative socio-economic-political impacts from the process of achieving progress by imposing social functions on land rights, land conservation obligations, special treatment for weak groups, accommodation in cooperatives for large-scale businesses, and prohibitions on monopolies. In light of various representations presented by the aforementioned author, the forthcoming discussion is anticipated to center around the spurious conveyance of a deed of gift, purportedly employed for the transference of a certificate of ownership from an individual, thereby giving rise to the issuance of duplicated certificates. The author aims to delve deeper into the existing issues and provide comprehensive answers by conducting a thorough study. This will be presented in a thesis titled "Analysis of Land Title Certificate Cancellations in Cases of Overlapping Certificates (A Study of the State Administrative Court Decision No. 54 /G/2022/PTUN.MTR)."

II. RESULT AND DISCUSSION

A. Background to Overlapping (Case Study of District Court Decision No.54/G/2022/PTUN.MTR)

1. *Background to Overlapping Certificates in case No.54/G/2022/PTUN.MTR*

The plaintiff acquired the disputed land from his parents, Pe Aisyah and Pe Aisyah, who obtained it through a sale and purchase transaction with Amaq Jasmi (parents of Sarappudin) as evidenced by Sale and Purchase Certificate Number: 12/1977 dated May 6, 1997. The plaintiff has been in possession of the land since 1980. The land is part of Hj. Huriyah, and Hj. Huriyah's brothers obtained other parts of the land in different locations. Since obtaining this part of the land, Hj. Huriyah has exercised control and worked on the land and has never transferred control either through pledging or through buying and selling up to the present time. On August 25, 2022, the Plaintiff was informed that his land had been issued an Ownership Certificate in the name of Sarappudin after reporting a raid to the East Lombok Police. Subsequently, the Plaintiff requested the Investigator, in the presence of Brother Burhanudin S.H. and his Attorney, to present the certificate for the Plaintiff's land, and for the Selong Police Investigator to issue and present a photocopy of the land ownership certificate in the name of Sarappudin with regard to the Object of the Dispute. The Plaintiff recently discovered that his land had been registered as SHM. Based on the aforementioned, on August 25, 2022, the Plaintiff, within the legal timeframe stipulated in Article 55 of Law Number 5 of 1986, filed a lawsuit in this matter.

The plaintiff attempted to identify Sarappudin's brother as the holder of the SHM and subsequently visited the East Lombok Land Office, the authority responsible for State Administrative Decisions, to seek clarification or an explanation concerning the truth and existence of the Object of the Lawsuit in the current case. The plaintiff was initially advised that the East Lombok Regency National Land Agency (BPN) would visit Sarappudin to retrieve the certificate. However, Sarappudin refused to hand it over. The second recommendation was for the plaintiff to pursue mediation mediated by the East Lombok Regency Land Office. Even though mediation was directed by the office, it never took place as Sarappudin consistently declined the invitation. The plaintiff has never transferred the land, and has always been in control of it, making tax payments. Additionally, the plaintiff possesses proof of ownership in the form of a sales agreement between the plaintiff's parents and Sarappudin's parents dated May 6, 1977.

The defendant has been established to have contravened the provisions outlined in government regulation no. 10 of 1961, Article 3, paragraph (2) concerning land registration, which specifies: "prior to the measurement of a plot of land, it is necessary to first:

a) investigation of the history of the land plot and

b) The boundaries in question are related to government regulation no. 10 of 1961 Article 3 paragraph (2). It has come to light that the Defendant did not investigate the history of the land plot, failed to determine its boundaries, and neglected to carry out measurements of the land requested for SHM by Sarappudin.;

The Defendant argues that the Plaintiff's lawsuit is based on the acquisition of land through a Sale and Purchase agreement between Amaq Jasmi and Pe Aisyah Number 12/1977. However, it is claimed that Amaq Jasmi, the seller as specified in the Plaintiff's documentation, passed away seven years prior to the date of the sale as per the death certificate issued by the Head of Pringgasela Village Number: 474.3/347/PRISEL/2019. Therefore, the Defendant asserts that the Plaintiff's claim for the disputed land is unfounded and should be entirely rejected. As per the Defendant's argument, the Plaintiff's initial evidence is in the form of a statement letter dated November 10, 2022, which asserts the plaintiff's ownership of the disputed land. However, the letter was authored and signed by the plaintiff's attorney, and is considered administrative evidence that does not meet the requirements to be deemed as valid administrative support. The evidence lacks legal basis and objectivity, and appears to be subjective in nature.

Consequently, the evidence presented by the Plaintiff does not carry the legal weight required for proof and should be rejected. Defendant II intervenes to support and confirm the arguments presented in the Defendant's answer (National Land Agency of East Lombok Regency), as outlined in the plaintiff's lawsuit at point 13. The plaintiff's arguments regarding Regulation of the Head of the National Land Agency Number 12 of 1992 and the articles concerning the Structure of the Duties of the Land Inspection Committee (Committee) are to be rejected, as per Defendant II's intervention. Additionally, in response to the plaintiff's point 14 argument regarding article 19 of Law Number 5 of 1950 and Government Regulation Number 24 of 1997, Defendant II acknowledges and supports the Defendant's stance. The National Land Agency of East Lombok Regency's position aligns with the Laws and Regulations, as well as the factual details related to the issuance of a certificate of ownership in the name of Defendant II Intervention (SARAPPUDIN). The Defendant has conducted Land registration activities in accordance with the applicable Laws and Regulations and the Technical Instructions for Implementing PTSL Activities.

2. *Position Case*

On August 25, 2022, Hj. Huriah, as the Plaintiff, reported to the East Lombok Police with a Certificate of Ownership Rights (SHM) for the Plaintiff's land in the name of Sarappudin. Upon further investigation at the East Lombok Land Office, it was discovered that the certificate was based on a right claimed by Sarappudin as Defendant II Intervention. The East Lombok Regency National Land Agency sought to revoke the certificate from Sarappudin, but Sarappudin declined to hand it over to them. As mediation with BPN failed, the Plaintiff's attorney filed an Administrative Appeal regarding the Dispute Object to the Head of the West Nusa Tenggara National Land Agency Regional Office on October 26, 2022. Subsequently, on November 14, 2022, the West Nusa Tenggara BPN Regional Office responded to the Administrative Appeal Letter, suggesting legal action through the Judicial Institution to ensure that the Plaintiff's land had not been transferred through sale and purchase, pawn, or grant.

a. Principal of the Plaintiff's Claim

- Object of the lawsuit

The subject of the State Administrative Lawsuit in question pertains to the PROPERTY RIGHTS CERTIFICATE (SHM) with Lawsuit Number: 01687, located in South Pringgasela Village/Subdistrict, dated 23/05/2018. This property spans an area of 2,321 square meters and is associated with Measurement Letter Number: 01719/2018 dated 07/ 05/2018 under the name of SARAPPUDIN. The property is situated in South Pringgasela Village, East Lombok Regency, West Nusa Tenggara. It is important to note that the disputed property is currently in the possession of SARAPPUDIN's brother, who will be referred to as the subject of the lawsuit moving forward.

- Concerning the Authority of the State Administrative Court (PTUN)

The subject of the dispute put forth by the Defendant is a State Administrative Decree, which fulfills the requirements outlined in article 1 number 9 of Law Number 51 of 2009 regarding the second amendment to Law No. 5 of 1986 concerning State Administrative Courts. According to the statute, State Administrative Decisions are written rulings issued by State Administrative Bodies or Officials that involve State Administrative Law actions based on relevant statutory regulations. These decisions must be Concrete, Individual, and Final, leading to legal consequences for an individual or Civil Legal Entity. The explanation of Concrete, Individual, and Final is as follows:

Concrete: In this case, the Defendant's decision letter was definite and in writing, indicating specific actions to be taken. The Defendant issued a State Administrative Decree that is clearly tangible, even though the land for which the Defendant issued the land certificate belongs to the Plaintiff, located in South Peringgasela Village, formerly Masbagik District, now Peringgasela District, Regency of East Lombok.

Individual: The decision letter issued by the Defendant applies specifically to an individual or legal entity and not to the general public. In the Certificate of Ownership Rights issued by the Defendant, the address or location of the land is clearly stated. The land was previously located in Pringgasela Village, Masbagik District, and is now situated in South Pringgasela Village, Pringgasela District, East Lombok Regency. This address indicates the location of the Plaintiff's land.

Final: The decision letter issued by the Defendant is final and has legal implications. The Defendant's action of publishing the subject of the lawsuit is clearly erroneous, and as a result, has definitely led to legal consequences. This means that the Plaintiff may risk losing ownership rights to the land.

- Regarding Deadlines and Administrative Efforts

Based on Article 55 of Law Number 5 of 1986 concerning State Administrative Courts, lawsuits must be submitted within 90 (ninety) days from the time the Decision of the State Administrative Body or Official is received or announced, as stipulated in the law. The plaintiff became aware of the subject matter of the lawsuit on August 25, 2022, when it was identified as the object under dispute. When the Certificate of Ownership Rights (SHM) was discovered, the Plaintiff was informed that their land had been encroached upon by Mr. SARAPPUDIN. This information was reported to the East Lombok Resort Police, and upon investigation, it was revealed that the land had been certified in the name of SARAPPUDIN. During the examination, the ownership certificate in the name of SARAPPUDIN was presented by the investigator and witnessed by BURHANUDIN, SH. Following the presentation of the SHM, the Plaintiff proceeded to verify the authenticity of the SHM by consulting the East Lombok Regency Land Office. Hence, the aforementioned legal action was initiated within the statutory time frame and presented to the appropriate State Administrative Court, which holds jurisdiction over the Defendant's residence. Article 55 of Law Number 5 of 1986 concerning State Administrative Courts reads: "A lawsuit can only be filed within a period of 90 (ninety) days from the time the decision of the State Administrative Agency or Official is received or announced"; The discovery and acceptance of the Decree issued by the Defendant by the Plaintiff occurred on August 25, 2022 when Mr. SARAPPUDIN was reported to the East Lombok Police Station.

That after the Plaintiff together with BURHANUDIN, SH and his Attorney were visited by East Lombok Police Investigators, they showed a photocopy of the Certificate of Ownership (SHM) of the Plaintiff's land and on that basis the Plaintiff knew that there was a Certificate of Ownership of the Plaintiff's land issued by the Defendant in his name. SARAPPUDIN ; Upon discovering the existence of an SHM issued by the Defendant, the Plaintiff proceeded to the East Lombok Regency Land Office to ascertain the veracity of the SHM issuance. After clarifying the matter with the East Lombok Regency Land Office, it was revealed that the Certificate was based on rights fabricated by Mr. SARAPPUDIN. Consequently, the Head of the East Lombok Regency National Land Agency (BPN) issued an order for the revocation of the certificate from SARAPPUDIN. Despite multiple attempts by the East Lombok Regency National Land Agency (BPN) to retrieve the Certificate, SARAPPUDIN refused to hand it over. In accordance with the publication of the Object of Dispute, HJ. HURIAH (the Plaintiff), represented by their legal counsel, submitted a formal objection to the National Land Agency (BPN) of East Lombok district on August 25, 2022, concerning the aforementioned publication.

In order to take action following the objection letter regarding the publication of the Object of Dispute, the East Lombok Regency National Land Agency has issued two summonses to SARAPPUDIN. The summonses were dated 14 October 2022 (Letter Number: 443/MP.01/X/2022) and 20 October 2022 (Letter Number: 454/MP.01/X/2022), with the aim of engaging in mediation. However, SARAPPUDIN did not attend the scheduled mediation sessions conducted by the East Lombok Regency National Land Agency. It should be noted that Mr. SARAPPUDIN consistently declined to attend all mediation summons at the National Land Agency Office of East Lombok Regency. Consequently, on October 25, 2022, the National Land Agency of East Lombok Regency responded to our written objection regarding the publication of the object of dispute. They conveyed their inability to resolve our objection through mediation. Following the response from the East Lombok Regency National Land Agency, on October 26, 2022, the Plaintiff's Attorney filed an Administrative Appeal concerning the publication of the Object of Dispute with the Head of the Regional Office of the National Land Agency in West Nusa Tenggara. On November 14, 2022, the Head of the Regional Office of the National Land Agency of West Nusa Tenggara responded to the Administrative Appeal Letter concerning the publication of the Dispute Object. The response indicated that legal action should be pursued through the Judicial Institution in accordance with the relevant regulations.

3. *Considerations and Instructions of the Panel of Judges from the perspective of Legal Certainty Theory*

The following are legal facts that are relevant to legal considerations:

- The Defendant has issued a Certificate of Ownership Rights with the number 01687 for a property spanning 2,321 square meters in South Pringgasela Village, dated 05/23/2018, along with Measurement Letter Number 01719/2018, dated 05/07/2018, in the name of SARAPPUDIN. The property is situated in South Pringgasela Village, East Lombok Regency, West Nusa Tenggara Province (refer to Evidence T.II.Intervention-2 and T-1) obtained through the Complete Systematic Land Registration Certification Program.
- The Defendant has officially released the minutes concerning Juridical Data Research and Boundary Determination, representing the involved party, Sarappudin, NIB: 23.03.12.07.01730, on 22 May 2018 (refer to exhibit T-7).
- In accordance with the ownership certificate number 01687 for South Pringgasela Village, Subdistrict, dated 23/05/2018, issued at the request of Sapparudin on 5-2-2018 (vide evidence T-3), it is important to remember the aforementioned information for academic and administrative purposes.
- The request for the Certificate of Ownership for the land is based on a Statement Letter from Sarafudin/Sarappudin (Defendant II Intervention), acknowledging that he received a gift of a 2500 square meter (25 acres) plot of rice field from Hj. Huriah in Orong Jumila Subak Otak Reban, South Pringgasela Village, Pringgasela District, dated 14 December 2016 (vide evidence P-11 = T-5).
- Hajjah Huriah acquired a piece of land, part of which was claimed for a Certificate of Ownership by Sarappudin. This claim was based on the Statement of Sale and Purchase of Rice Field Land between seller Hajjah Marhamah/Hajjah Mardiah and buyer Hajjah Huriah for a land area of 7,400 square meters on 19 August 2002 (refer to Exhibit P-12 and T 6). Furthermore, a Tax Return for Land and Building Tax (PBB-P2) with NOP: 52.03.140.006.012-0060.0 has been issued under the name of Hajjah Huriah for the aforementioned land (refer to evidence P-12 and T-4).
- A Sale and Purchase Certificate bearing Number 12./1977 attests to the transaction between Amaq Jasmi as the Seller and Pe Asyiah as the Buyer, for the garden land no. 577 pcl, no. 93 class II area of 0.740 hectares located in Orong Jumila, dated 6 May 1977 (supported by evidence P-1).
- The plaintiff has filed an objection (refer to evidence P-7) and pursued an administrative appeal (refer to evidence P-8) with respect to the issuance of Certificate of Ownership Number: 01687/Village/Kelurahan Pringgasela Selatan in the name of Sarappudin.

Based on the author's analysis, overlapping certificates occurred in case No.54/G/2022/PTUN.MTR Jo. 25/B/2022/PTTUN.MTR due to the East Lombok Regency National Land Agency (BPN) negligently issuing a Certificate of Ownership (SHM) in the name of Sarappudin without conducting a proper historical

investigation of the land plot and defining its boundaries. With reference to Government Regulation No. 10 of 1961 article 3 paragraph (2) (now revoked by Government Regulation No. 24 of 1997 concerning Land Registration), it is evident that the Defendant failed to determine the boundaries and conduct the necessary land measurements as requested by SHM. This violation by the East Lombok Regency National Land Agency of the General Principles of Good Government (AUPB) including the Principle of Accuracy, the Principle of Legal Certainty, and the Principle of Professionalism has been identified. To uphold the theory of legal certainty, the East Lombok Regency BPN is required to revoke SHM Number: 01687 in the name of Sarappudin to ensure that the existence of guaranteed legal certainty does not prejudice the Plaintiff.

C. Implications of Cancellation of Land Title Certificates in Overlapping Certificate Cases: A Case Study of State Administrative Court Decision No.54/G/2022/PTUN.MTR

1. Announcement of Case Decision No.54/G/2022/PTUN.MTR

a) Eksepsi

State the exception of the Defendant and Defendant II. Intervention is not accepted;

b) Main Case

- Granted the Plaintiff's lawsuit in its entirety.

- Declaring Canceled Ownership Certificate Number: 01687, South Pringgasela Village/Subdistrict, dated 05/23/2018, Area 2,321 M2 with Measurement Letter Number: 01719/2018, dated 05/07/2018, in the name of SARAPPUDIN, located in Pringgasela Village South, East Lombok Regency, West Nusa Tenggara Province.

- Require the Defendant to revoke Certificate of Ownership Number: 01687, South Pringgasela Village/Subdistrict, dated 23/05/2018, Area 2,321 M2 with Measurement Letter Number: 01719/2018, dated 07/05/2018, in the name of SARAPPUDIN, located at South Pringgasela Village, East Lombok Regency, West Nusa Tenggara Province.

- Sentenced the Defendant and Defendant II to intervene jointly to pay court costs amounting to Rp. 470,000.00. (Four Hundred and Seventy Thousand Rupiah

2. Announcement Decision on Appeal Case No.25/B/2023/PTUN.MTR

- Accept the appeal request from the original Appellant as Defendant and the original Appellant as Defendant II Intervention;

- Strengthen the decision of the Mataram State Administrative Court Number 54/G/2022/PTUN.MTR, dated April 14 2023, which is requested to be appealed

- Sentenced the original Appellant as Defendant and the original Appellant as Defendant II to intervene jointly to pay the case costs at both court levels, which for the appeal level was set at Rp. 250,000.00 (two hundred and fifty thousand rupiah);

3. Cancellation of Certificate of Ownership Rights (SHM) Number: 01687

a. Request for cancellation to the National Land Agency of East Lombok Regency

1) In the realm of public administration, there exists the possibility that a decision by the Public Administration Tribunal (PTUN) may encounter non-implementation by state administrative authorities. This can be attributed to a combination of technical legal constraints and the disposition of said authorities.

2) From a technical juridical perspective, it is noteworthy that Law No. 5 of 1986 and several principles in administrative law do not encompass provisions regulating instruments that can compel state administrative officials to implement PTUN decisions.

3) Officials who fail to execute PTUN decisions demonstrate a lack of reverence for the principles of the rule of law and a failure to recognize their role as public servants entrusted with pursuing the public interest."

4) To be able to break through this, jurisprudence is needed and created by the PTUN judges.

b. The limitations of the PTUN Law

1) If a legally binding decision is not implemented, the PTUN Law allows for administrative sanctions to be imposed by the superior of the relevant TUN Agency/Official. These sanctions serve as coercive measures to ensure enforcement of the decision.

2) Please take note of the following text: Other measures outlined in the PTUN Law include the use of fines and public announcements through mass media. According to Article 116, paragraph (5) of the PTUN

Law, officials who fail to execute the court's decision will have their non-compliance announced in the local print media by the court clerk when the 90-day deadline is not met. After this deadline, the plaintiff can request the court's head to compel the defendant to carry out the decision.

3) According to Article 116, paragraph (6) of the PTUN Law, the chairman of the court is required to report instances of non-compliance to the President, who holds the highest government authority, and to the DPR to fulfill its oversight role. This underscores the President's power to compel TUN officials to execute decisions.

III. CONCLUSION

Based on the findings and analysis presented by the author in the preceding chapter, several conclusions can be formulated:

In the case examined by the author, the overlap was attributed to the negligence of the National Land Agency (BPN) in issuing a Certificate of Ownership Rights (SHM) based on a fraudulent grant deed. The National Land Agency (BPN) was found to be negligent in issuing Certificate of Ownership Rights (SHM) Number: 01687, South Pringgasela Village/Subdistrict, dated 23/05/2018, Area 2,321 M² with Measurement Letter Number: 01719/2018 dated 07/05/2018 in the name of Sarappudin, who has been shown to have violated the General Principles of Good Government (AUPB), particularly the Principle of Accuracy and the Principle of Legal Certainty. Therefore, according to Decision No.54/G/2022/PTUN.MTR and Decision No.25/B/2023/PTUN.MTR, the certificate issued by the National Land Agency (BPN) has been deemed flawed and must be invalidated to prevent harm to the Plaintiff, who holds a valid Certificate of Ownership (SHM) supported by a Sale and Purchase Agreement between the owners, Aisyah (Plaintiff's parents) as the buyer and Amaq Jasmi (Sarappudin's parents) as the seller on May 6, 1977.

It is important to note that the Certificate of Ownership (SHM) bearing the Number: 01687 has been invalidated and therefore holds no legal weight. The true evidence of ownership lies in the Sale and Purchase Certificate with the Number: 12/1977, dated 6 May 1977. In the future, it is crucial to ensure that the National Land Agency (BPN) conducts thorough investigations into the history of the land before issuing certificates. This level of diligence and supervision will help to minimize instances of overlapping that may result from oversights by the National Land Agency (BPN). In fulfilling its functions as a Land Agency, the National Land Agency (BPN) must adhere to the commitment that, in cases of negligence in the issuance of a certificate, it is obligated to execute the revocation of the certificate in adherence to the relevant court ruling.

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