

Marriage annulment in Bandung Religious Court: justice and legal certainty analysis

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Abstract : Marriage annulment remains a significant juridical issue concerning rights protection and legal certainty within marital institutions. Previous studies have mainly examined annulment from a normative legal perspective, with limited attention to the interaction between justice and legal certainty in judicial reasoning. This study aims to analyze the legal grounds and judicial considerations of marriage annulment decisions at the Bandung Religious Court through the perspectives of justice and legal certainty. The research employs a normative juridical method using statutory, case, and legal theory approaches, with qualitative analysis of primary legal materials, including Law Number 1 of 1974 on Marriage and the Compilation of Islamic Law. The findings show that the principal cause of annulment was a violation of Article 9 of the Marriage Law, where one party was still legally bound in a previous marriage, compounded by administrative negligence of the Office of Religious Affairs (KUA) in verifying marital status. The decision reflects corrective justice and Rawlsian justice as fairness by protecting the injured spouse while restoring legal order. The novelty lies in presenting marriage annulment as a mechanism for balancing substantive justice and legal certainty in family law adjudication in Indonesia.

Keywords : Marriage Annulment; Justice Theory; Legal Certainty; Religious Court.

Abstrak : Pembatalan perkawinan tetap menjadi isu yuridis penting yang menyangkut perlindungan hak dan kepastian hukum dalam lembaga perkawinan. Studi-studi sebelumnya sebagian besar meneliti pembatalan perkawinan dari perspektif hukum normatif, dengan perhatian terbatas pada interaksi antara keadilan dan kepastian hukum dalam penalaran yudisial. Studi ini bertujuan untuk menganalisis dasar hukum dan pertimbangan yudisial dari keputusan pembatalan perkawinan di Pengadilan Agama Bandung melalui perspektif keadilan dan kepastian hukum. Penelitian ini menggunakan metode yuridis normatif dengan pendekatan hukum perundang-undangan, kasus, dan teori hukum, dengan analisis kualitatif bahan hukum primer, termasuk Undang-Undang Nomor 1 Tahun 1974 tentang Perkawinan dan Kompilasi Hukum Islam. Temuan menunjukkan bahwa penyebab utama pembatalan adalah pelanggaran Pasal 9 Undang-Undang Perkawinan, di mana salah satu pihak masih terikat secara hukum dalam perkawinan sebelumnya, ditambah dengan kelalaian administratif Kantor Agama (KUA) dalam memverifikasi status perkawinan. Keputusan tersebut mencerminkan keadilan korektif dan keadilan Rawls sebagai keadilan dengan melindungi pasangan yang dirugikan sekaligus memulihkan ketertiban hukum. Kebaruan terletak pada penyajian pembatalan perkawinan sebagai mekanisme untuk menyeimbangkan keadilan substantif dan kepastian hukum dalam peradilan hukum keluarga di Indonesia.

Kata kunci : Pembatalan Perkawinan; Teori Keadilan; Kepastian Hukum; Pengadilan Agama.

INTRODUCTION

The phenomenon of marriage and its annulment is a global issue that continues to receive attention from legal and social academics, considering that marriage is a fundamental institution in human life (Reconstruction of Polygamy Justice, 2025). Internationally, the issue of marriage validity is often linked to issues of human rights, gender justice, and child protection, as reflected in the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), which requires states to guarantee legal certainty in marriage (Hapriyanto & Syamsiah, 2024). In an academic context, the study of the validity of marriage is important because it is related to the legitimacy of state law regarding social practices in society and the protection of the rights of the parties involved in family relationships.

In Indonesia, the legality of a marriage is regulated by Law Number 1 of 1974 concerning Marriage and the Compilation of Islamic Law (KHI). Article 2 of this law stipulates that a marriage is considered valid if it is conducted according to the laws of each respective religion and is officially registered by the state. This registration is not merely administrative but also serves to provide legal certainty for the husband, wife, and any children born of the marriage. However, in practice, there are still numerous cases of marriages being annulled by religious courts due to failure to meet formal or material requirements (Quthny & Muzakki, 2022).

Nationally, marriage annulment cases continue to be quite high. According to a report by the Directorate General of Religious Courts of the Supreme Court of the Republic of Indonesia, in 2023, more than 4,500 marriage annulment cases were filed with religious courts across Indonesia for various reasons, including underage marriage, lack of parental consent, unauthorized polygamy, and identity fraud (Badilag, 2023). This situation demonstrates that despite clear marriage regulations, their implementation in social practice still faces various problems that lead to legal disputes.

Several previous studies have examined marriage annulment from various perspectives. Turatmiyah *et al.* (2015), examined the legal consequences of marriage annulment from the perspective of child and women's protection, but focused more on the social impact than on normative analysis of justice and legal certainty. Aswira and Santoso (2019), discussed marriage annulment due to identity fraud, but their study was limited to analyzing a single court decision without linking it to a theoretical framework of justice. Meanwhile, Nurmah *et al.* (2025) highlighted legal certainty in applications for expired marriage annulment, but did not specifically examine the context of the Bandung Religious Court.

Based on this study, it is clear that research on marriage annulment tends to be descriptive of court decisions or focused on their social impact. Studies specifically analyzing the causes of marriage annulment using the perspectives of justice and legal certainty theories are still relatively limited. Yet, the tension between justice and legal certainty is a classic issue in legal philosophy that has strong relevance in judicial practice, including in family cases in religious courts (Nur, 2023).

Furthermore, research specifically examining the causes of marriage annulments in the Bandung Religious Court is still rare. Yet, as a major city with complex social dynamics, Bandung is an important context for analysis due to the potential for diverse family law conflicts. The increasing number of marriage annulment cases in this region indicates problems in the implementation of marriage law, related to administrative, social, and substantive legal factors.

Therefore, this study aims to examine the legal causes of marriage annulments in the Bandung Religious Court using the perspectives of justice and legal certainty theory. This analysis

is expected to provide a more comprehensive understanding of how religious courts balance the application of legal norms with the demands of justice in deciding marriage annulment cases, while also providing a theoretical contribution to the development of family law studies in Indonesia.

This research focuses on the Bandung Religious Court decision Number 1038/Pdt.G/2025/PA.Badg to analyze the causes of marriage annulment and review it based on the theory of justice and legal certainty. This research aims to identify the factors underlying the occurrence of marriage annulment and analyze the judge's considerations in the decision through the perspective of the theory of justice and legal certainty. Thus, this research is directed to answer two research questions, namely: what are the factors that cause the annulment of marriage in the Bandung Religious Court decision Number 1038/Pdt.G/2025/PA.Badg? and how are the judge's considerations in the decision reviewed based on the theory of justice and legal certainty?

METHOD

This research uses a normative legal approach with a *normative legal analysis model with a case-based judicial reasoning approach*. This approach is used to examine positive legal norms and critically analyze the legal considerations used by judges in a court decision. The focus of the research is not only on the text of the legislation, but also on how these norms are interpreted and applied by judges in deciding cases of marriage annulment. This approach was chosen because the issue studied relates to the application of marriage legal norms in religious court practice, specifically through an analysis of the Bandung Religious Court decision Number 1038/Pdt.G/2025/PA.Badg.

The data sources in this study consist of primary, secondary, and tertiary legal materials. Primary legal materials include the Decision of the Bandung Religious Court Number 1038/Pdt.G/2025/PA.Badg, Law Number 1 of 1974 concerning Marriage, and the Compilation of Islamic Law (KHI) as the normative basis for marriage annulment cases. Secondary legal materials consist of literature relevant to family law, justice theory, and legal certainty theory, such as textbooks, scientific articles, and previous research. Tertiary legal materials are used to help explain legal terms or concepts, such as legal dictionaries and encyclopedias (Salim & Nurbani, 2013).

Data collection was conducted through documentation studies by reviewing, inventorying, and classifying legal materials relevant to the research focus. In the context of this research, the primary documents analyzed were court decisions, which were systematically studied to identify legal facts, the basis for the judge's considerations, and the verdicts rendered. This technique aligns with the characteristics of normative legal research, which relies on secondary data in the form of legal documents as the primary source of analysis (Ibrahim, 2008).

The data analysis process was conducted qualitatively and legally through several stages. First, identifying the structure of the court decision, including the chronology of the case, the legal facts found by the judge, the legal basis used, and the considerations behind the decision. Second, examining the judge's considerations to identify the *judicial reasoning patterns* used in deciding the annulment of marriage. Third, linking these considerations to the applicable legal norms in the Marriage Law and the Compilation of Islamic Law to assess their compliance with positive law provisions. Fourth, applying the theoretical framework of justice and legal certainty as an analytical tool to assess whether the judge's considerations reflect an effort to balance substantive justice and legal certainty in judicial practice.

Through this approach, the research not only describes the content of the decision but also critically analyzes the legal rationale used by judges to justify marriage annulments. Thus, this method allows researchers to identify the factors causing marriage annulments and evaluate how the principles of justice and legal certainty are applied in religious court practice.

RESULTS AND DISCUSSION

Result

Based on an analysis of the Bandung Religious Court Decision Number 1038/Pdt.G/2025/PA.Badg, the annulment of the marriage in this case was based on the discovery that one of the parties was still bound by a valid marriage when conducting the new marriage contract. This condition contradicts the basic principle of marriage law in Indonesia which prohibits a person from entering into a new marriage while still bound by a previous marriage without court permission. In their consideration, the panel of judges deemed that the violation of this principle rendered the marriage not meeting legal requirements and therefore subject to annulment.

Research findings indicate several key factors contributing to the annulment of marriages in these cases. First, one party's marital status was still active, resulting in the marriage contract not meeting the legal requirements for marriage. Second, dishonesty in providing information regarding their marital status to the marriage registrar. This concealment of marital status resulted in the registration process being based on information that did not align with the actual legal conditions. Third, weaknesses in the administrative verification process by the Office of Religious Affairs (KUA), resulting in the prospective bride and groom's marital status documents not being thoroughly examined before the marriage was registered.

In addition to these causal factors, the research results also reveal the pattern of legal considerations used by the panel of judges in deciding cases of annulment of marriage. The judge emphasized that registration of a marriage at the Office of Religious Affairs (KUA) does not automatically render a marriage valid if it substantively violates the legal requirements of marriage. Therefore, the existence of a marriage certificate in this case cannot be used as a basis for the validity of the marriage because the marriage was legally flawed from the outset. In his consideration, the judge stated that violating the prohibition on marrying while still in another marriage constitutes a fundamental violation, making annulment the appropriate legal step to restore legal order.

From the perspective of the theory of justice and legal certainty, this decision demonstrates the judge's effort to balance these two principles. From a legal certainty perspective, the annulment of a marriage is carried out to uphold the legal rule prohibiting multiple marriages without court permission. Meanwhile, from a justice perspective, the decision provides protection to parties harmed by concealment of marital status. Thus, annulment is seen not only as a formal application of legal norms but also as a form of correction for legal violations that could harm one of the parties in the marital relationship.

Overall, the research results indicate that the annulment of the marriage in this case was based on legal grounds, namely violations of the substantive requirements of marriage, particularly regarding the active marital status. Furthermore, dishonesty on the part of the married parties and weaknesses in administrative verification at the Office of Religious Affairs (KUA) also contributed to the incident. These findings demonstrate that annulment is not only triggered by individual violations, but also relates to institutional aspects of the marriage registration process.

Discussion

Reasons for Marriage Annulment in the Bandung Religious Court Reviewed Based on the Theory of Justice

In Bandung District Court Decision No. 1038/Pdt.G/2025/PA.Badg, the annulment was carried out because it was revealed that at the time of the contract and registration at the Office of Religious Affairs (KUA), one of the parties was still bound by a previous marriage. This fact indicates a material violation of the requirements for a valid marriage (Wirnyaningsih, 2018). From a justice theory perspective, this annulment serves as a corrective instrument so that the injured party does not continue to bear the burden of a flawed contract. This is supported by research by Tisch & Lersch (2021), which emphasizes that corrective justice restores balance when errors occur.

In Bandung Religious Court Decision No. 1038/Pdt.G/2025/PA.Badg, the panel of judges annulled the marriage because it was proven that at the time of the marriage contract and registration at the Office of Religious Affairs (KUA), one of the parties was still bound by a previous marriage. This fact was the primary basis for the judge's consideration that the marriage did not meet legal requirements and was flawed from the outset. Therefore, annulment was taken as a legal step to correct the violation of the substantive requirements of marriage (Wirnyaningsih, 2018).

From the perspective of Aristotle's theory of justice, the judge's considerations in annulling the marriage reflect the concept of corrective justice, which is an attempt to correct an imbalance arising from an unlawful act. In this case, the imbalance arose because one party concealed their marital status, leaving the other party disadvantaged. By annulling the marriage, the judge attempted to restore the legal situation to its proper state and restore the rights of the injured party. This finding aligns with the view that corrective justice functions to restore legal balance when a violation occurs in a legal relationship (Tisch & Lersch, 2021).

Furthermore, the element of justice is also evident in the judge's consideration of not using administrative registration as the sole basis for validating a marriage. Although the marriage has been registered with the Office of Religious Affairs (KUA), the judge considered that the existence of a marriage certificate cannot maintain the validity of the marriage if there is evidence of a violation of the substantive requirements of marriage. This consideration demonstrates that the judge adheres not only to administrative formalities but also considers substantive justice for the parties involved (Margono, 2019).

Another perspective can be seen through the theory of justice as fairness proposed by John Rawls. In this theory, a just decision is one that protects the party in a weaker or disadvantaged position. In this decision, the judge considered that one party was unaware of their partner's true marital status at the time of the marriage ceremony. Therefore, annulment of the marriage is seen as a form of legal protection for the party harmed by dishonest information during the marriage process. Thus, the judge's considerations in this case demonstrate the application of the principle of justice, which places protection for the disadvantaged party as a crucial part of enforcing marriage law.

Overall, an analysis of this decision shows that the annulment of a marriage is not solely based on a violation of legal norms, but also reflects the judge's attempt to uphold justice in marital relations. Through the annulment, the judge seeks to restore legal balance while also providing protection to parties harmed by the concealment of marital status. *difference* principle, proposed by John Rawls, states that inequality can only be justified if it benefits the most

vulnerable party. In the context of the Bandung Religious Court decision No. 1038/Pdt.G/2025/PA.Badg, marriage annulment is seen as an effort to protect parties harmed by concealment of their previous marital status. If a substantively flawed marriage is maintained simply because it has been administratively registered, then the party unaware of its true status will suffer greater legal losses (Marune, 2023). Therefore, annulment can be understood as a step to prevent uncertainty about legal status that could potentially harm one of the parties in a continuous manner.

However, upon closer examination, the decision is not entirely free from issues of justice. While annulment of a marriage restores the legal standing of the injured party, it can also have social and legal consequences for other parties involved. For example, if a child has been born during the marriage, annulment has the potential to raise issues regarding the child's civil status, inheritance rights, and social acceptance. Furthermore, annulment can also impact legal relationships related to joint property and other civil rights that may have been established during the marriage. Therefore, while the decision is normatively intended to uphold justice, the resulting social and legal impacts still need to be considered within the broader framework of justice.

From a procedural justice perspective, the theory states that the judicial process must be conducted fairly, transparently, and provide equal opportunities for all parties to present their defenses (Raden, 2024). In this case, the panel of judges carried out the case examination procedure by summoning the parties and examining evidence such as the divorce certificate, marriage certificate extracts, and marriage registration documents. However, the fact that one of the parties was not present at the hearing raises questions about the effectiveness of the application of procedural justice, particularly regarding the access and participation of the absent party. This condition indicates that although legal procedures have been carried out in accordance with regulations, there is still room to examine the extent to which the process truly provides equal opportunities for all parties involved in the case.

The theory of substantive justice places greater emphasis on whether the final outcome reflects moral values and real conditions, rather than simply adherence to the text of the law. The Bandung decision to overturn the case despite the issuance of an administrative deed demonstrates that the judge prioritized substantive justice over mere formality. Gustav Radbruch's theory of justice states that if positive law is in direct conflict with justice, it loses moral validity and must be ignored. In the Bandung case, although the registration at the KUA was administratively valid, when the material of the contract contradicted the principles of marriage law, the judge prioritized justice over administrative certainty.

However, the theory of justice also recognizes the importance of legal certainty as a fundamental principle (*justice, certainty, utility*). In the Bandung decision, the judge declared that annulment is valid *ex tunc*, thus deeming the marriage status invalid. This decision provides legal certainty that the deed cannot be used for future legitimacy, while also restoring justice to the injured party.

Weak verification at the Office of Religious Affairs (KUA) is the primary cause of defective marriage certificates. In the theory of institutional justice, state institutions such as the KUA should function as guardians of justice, not as sources of injustice. Administrative marriage certificate annulment is a remedy for this institutional failure. Status concealment or dishonesty by one party contributes to information asymmetry. In justice theory, a party with superior status should not exploit its information advantage to the detriment of another party (Addinur, 2024). This annulment decision sanctions unfair information behavior.

The absence of a marriage confirmation or court validation prior to registration increases the possibility of a marriage certificate legalizing a flawed marriage contract. Within the framework of procedural and substantive justice, validation through the courts serves as a check to prevent the legitimization of a contract that actually violates material requirements. The annulment in this decision is in accordance with the principle of corrective justice, which states that the injured party should not be forced to maintain a flawed legal status. In the local context of Bandung, this decision demonstrates that judges consider the justice of the societal context and legal facts, not merely formalities.

In conclusion, the reasons for the annulment of marriage in the Bandung District Court Decision, namely the old marital status, weaknesses in KUA verification, dishonest information, and the lack of legal validation must be viewed through the lens of justice theories: Aristotle (corrective, distributive), Rawls (*fairness* and *difference*), *Radbruch* (justice as a priority), and procedural and substantive justice. This decision emphasizes that judges not only apply the law, but also prioritize the value of justice so that decisions do not cause structural injustice. Based on the preceding analysis, the following table systematizes the relationship between legal issues, justice considerations, and legal certainty in the annulment decision.

Legal Issue	Justice Dimension	Legal Certainty Dimension
Existing prior marriage at the time of remarriage	Protects the good-faith spouse from deception and unequal treatment	Confirms that marital status must comply with statutory requirements
Concealment of marital status	Applies corrective justice against dishonest conduct and abuse of trust	Invalidates consent formed on false information and defective legal capacity
Inadequate verification by the Office of Religious Affairs (KUA)	Reflects institutional unfairness resulting from administrative negligence	Weakens the reliability and credibility of marriage registration records
Judicial annulment of marriage	Restores fairness, equality, and protection of the injured party	Re-establishes legal order, valid status, and certainty of future rights

The table illustrates that judicial annulment is consistently positioned at the intersection of corrective justice and legal certainty, indicating a deliberate effort by the court to reconcile normative legality with equitable outcomes.

Reasons for Marriage Annulment at the Bandung Religious Court Reviewed Based on Legal Certainty

One of the root causes of the annulment in Decision No. 1038/Pdt.G/2025 was the uncertainty of the legal status of the marriage at the time of the marriage contract and registration at the Office of Religious Affairs (KUA), namely that one party was still bound by another marriage. This uncertainty undermines the legal certainty mandated by Law No. 1/1974 concerning Marriage; therefore, the court annulled the deed that caused the confusion of legal status (Faishol, 2019).

Legal certainty requires formal evidence that guarantees the status of the parties (divorce certificate, marriage certificate extract, or itsbat decision, if necessary). If KUA registration is issued without adequate status verification, the certificate creates a false sense of certainty, which

can actually harm third parties and give rise to legal litigation. This is supported by research emphasizing the role of registration as a pillar of legal certainty (Virahmawaty & Rahim, 2022).

In the Bandung ruling, the discrepancy between the material facts of the marriage contract (one party is still married) and the administrative documents recorded at the Office of Religious Affairs (KUA) created a conflict between formal legality and material truth. Legal certainty demands that formal legality (KUA records) truly reflect material truth; otherwise, that certainty backfires (Imam Faishol, 2019).

Enforcing legal certainty in the realm of marriage is also related to the function of *itsbat nikah* (marriage confirmation) as a mechanism that provides certainty for unregistered marriages. Annulment decisions emphasize that if the original status is inconsistent, administrative registration cannot replace a court decision that provides true certainty (*itsbat* or annulment). This aligns with research on the role of *itsbat* in ensuring marital status certainty (Nazah & Husnia, 2018).

Weaknesses in verification procedures at the Office of Religious Affairs (KUA) (e.g., insufficient cross-checking of divorce certificates/registers with other KUAs) are a practical factor that erodes legal certainty. If the KUA does not implement strict verification procedures, the issued certificates are vulnerable to subsequent revocation, thus compromising long-term legal certainty for the parties involved. Empirical research consistently demonstrates this administrative weakness (Khotimah, 2024).

Legal certainty also relates to the certainty of legal consequences (child status, inheritance, and maintenance). A decision to annul an *ex-tunc marriage certificate* has serious legal implications; therefore, the court is obliged to consider the impact of legal certainty on third parties (e.g., children). Academic documents emphasize that the purpose of registration is to provide certainty for these rights (Virahmawaty & Rahim, 2022).

From a juridical-normative perspective, the principle of legal certainty requires clear rules and procedures regarding who is authorized, what documents are required, and correction mechanisms (e.g., cancellation, *itsbat*). The Bandung Decision upheld this correction mechanism, namely cancellation, to restore certainty damaged by inaccurate administrative documents. This aligns with theoretical studies of legal certainty (Julyano, 2019).

Several studies have emphasized that legal certainty extends beyond formal certainty to institutional practices. If practices in the field (such as the Office of Religious Affairs (KUA) and registrars) are inconsistent, legal certainty in society will decline. Decisions to annul marriage certificates registered without verification are a judicial response to improve the certainty of these practices (Yasmin *et al.*, 2024).

Legal uncertainty often arises from *information asymmetry*. (one party conceals their status) resulting in misleading records. Legal certainty requires document transparency and material truth. When these are compromised, court decisions tend to restore certainty of rights by annulling administrative documents. This is supported by studies on the impact of dishonesty on the legal certainty of marriage (Mamonto, 2024).

The other side of certainty is procedural certainty, where disputes must be resolved through predictable mechanisms (summons, evidentiary hearings). The Bandung decision demonstrates that the court applied procedures (summons, evidentiary hearings) before annulling a case, thus ensuring procedural certainty remains even if the outcome changes the legal status. Research on procedural certainty reinforces the importance of these steps (Julyano, 2019).

Several articles highlight that upholding legal certainty also means providing guidance to the Office of Religious Affairs (KUA) and policymakers to improve SOPs (verification standards).

Annulment decisions serve as a signal that legal certainty requires administrative improvements to ensure that issued deeds are truly final and not easily challenged. Research on the implementation of registration emphasizes the need for such SOPs (Imam Faishol, 2019).

In some cases, legal certainty can conflict with social certainty (e.g., delays in prosecution, the interests of children). Courts must weigh long-term legal certainty against individual and public rights. The Bandung decision, which declared a marriage null and void, demonstrates that judges considered true legal certainty (a certain status) more important than maintaining misleading administrative documents. Similar analyses emerge in studies of legal certainty regarding the phenomena of polyandry, inter-national marriage, and others (Rafiqi & Kartika, 2023).

Several empirical studies emphasize that fragile legal certainty in the realm of marriage generates significant social and legal costs: disputes over property, child status, and access to protection (Faishol, 2019; Khotimah, 2024). Annulment decisions, as a correction, have the effect of preventing these costs from continuing, so that decisions that appear to reduce short-term certainty actually restore long-term certainty (Moho, 2019).

Analytical conclusions, the causes of the annulment in Decision No. 1038 are primarily rooted in: (a) uncertainty of the parties' legal status at the time of the contract (b) weaknesses in administrative verification at the Office of Religious Affairs (KUA) (c) concealment of status by the parties (d) lack of court validation (*itsbat*) prior to registration. All of these factors undermine the principle of legal certainty, so the court acted to annul the marriage to restore formal and material certainty. This is in line with various studies that emphasize the role of registration, verification, and *itsbat* in ensuring certainty (Nazah & Husnia, 2018; Virahmawaty & Rahim, 2022).

CONCLUSION

Based on the analysis of Bandung Religious Court Decision Number 1038/Pdt.G/2025/PA.Badg, this study concludes that marriage annulment primarily resulted from violations of substantive marriage requirements, particularly where one party remained legally bound by a prior marriage at the time of the marriage contract. The case also reveals contributory administrative weaknesses in marital-status verification by the Office of Religious Affairs (KUA), compounded by dishonesty in disclosing legal status. These findings indicate that marriage annulment arises not only from individual misconduct but also from institutional deficiencies in marriage registration. Theoretically, this study demonstrates that marriage annulment functions as a corrective legal mechanism through which judges restore legal balance while upholding statutory marriage norms. The decision further confirms that justice and legal certainty are not inherently contradictory; rather, both principles can operate complementarily in judicial reasoning. Practically, the study highlights the urgent need to strengthen document verification procedures, improve coordination between registration authorities and religious courts, and prevent future disputes arising from defective marriages. This research also provides a basis for broader comparative studies on annulment practices and judicial reasoning in religious courts across Indonesia.

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