

Constitutional Law Accountability for the Forgery of Public Officials' Documents

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ABSTRACT

The authenticity of documents submitted by public officials constitutes a fundamental element of constitutional governance, administrative legitimacy, and the rule of law. In a democratic legal system, official documents serve not merely as administrative requirements but also as instruments that establish public trust and validate the constitutional authority exercised by state officials. The emergence of allegations involving forged educational or identity documents has raised significant constitutional and administrative concerns, as such misconduct extends beyond criminal liability and directly affects the legitimacy of public office and democratic governance. This study aims to examine the forms of constitutional law accountability applicable to public officials involved in document forgery and to analyze the existing mechanisms for administrative verification and legal responsibility within the Indonesian constitutional framework. The research employs a normative legal method using statutory, conceptual, and case approaches. Primary legal materials consist of the 1945 Constitution of the Republic of Indonesia, Law Number 30 of 2014 concerning Government Administration, Law Number 7 of 2017 concerning General Elections, the Indonesian Criminal Code, and relevant electoral regulations, which are examined through qualitative legal analysis using grammatical, systematic, and teleological interpretation. The findings indicate that constitutional accountability may be implemented through three principal mechanisms: administrative sanctions, the revocation or annulment of administrative decisions based on the *contrarius actus* principle, and judicial review before the State Administrative Court (*Pengadilan Tata Usaha Negara*). Nevertheless, the absence of an integrated verification system among state institutions creates legal uncertainty and weakens preventive oversight. This study concludes that strengthening institutional coordination, enhancing the authority of electoral and supervisory bodies, and integrating public administrative databases are essential to ensuring the authenticity of official documents and reinforcing constitutional accountability, legal certainty, and public confidence in state institutions.

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1. INTRODUCTION

The principle of the rule of law requires every exercise of governmental authority to be founded upon legal norms, accountability, and respect for constitutional values. In Indonesia, this principle is explicitly recognized in Article 1 paragraph (3) of the 1945 Constitution of the Republic of Indonesia, which affirms that Indonesia is a state governed by law. Consequently, every public official, regardless of the office held, is required not only to comply with substantive legal obligations but also to fulfill the administrative requirements prescribed by law. These requirements are intended to ensure that public office is occupied by individuals who possess legitimate qualifications and who obtain authority through lawful procedures (Hoxha & Miti, 2025).

The authenticity of official documents has become one of the essential elements in guaranteeing constitutional legitimacy and public confidence in state institutions. Documents such as educational certificates, identity records, and other administrative requirements are not merely procedural formalities; rather, they constitute legal evidence demonstrating that an individual satisfies the qualifications established by legislation. The submission of forged documents by a public official therefore represents more than an administrative irregularity. It undermines the constitutional principle of legality, weakens democratic legitimacy, and erodes public trust in governmental institutions (Subrata, Arifin, & Maarif, 2025).

In recent years, allegations concerning forged educational certificates and other administrative documents submitted by candidates for public office have attracted considerable public attention in Indonesia. These issues have generated extensive legal and political debates because they involve constitutional rights, electoral integrity, and public accountability. In many cases, discussions surrounding document authenticity have shifted from objective legal examination toward political narratives and public opinion formed through mass and social media. Such circumstances frequently complicate the legal process, particularly when allegations are not accompanied by comprehensive administrative verification or legally admissible evidence (Yusdiansyah, 2023).

From a legal perspective, document forgery is generally addressed within the framework of criminal law because it constitutes an offense against the authenticity of written evidence. Nevertheless, limiting the issue solely to criminal liability does not adequately resolve the broader constitutional implications arising from the appointment or election of public officials who obtained office through allegedly invalid administrative documents. Constitutional Law and Administrative Law provide additional mechanisms aimed at preserving the legitimacy of state administration, including administrative sanctions, annulment of administrative decisions, and judicial review before the State Administrative Court (Armstrong, 2005).

Despite the availability of these legal instruments, Indonesia's current regulatory framework remains fragmented. Various statutes regulate document authenticity from different perspectives, including the Criminal Code, Law Number 30 of 2014 concerning Government Administration, Law Number 7 of 2017 concerning General Elections, and legislation governing population administration. However, these regulations do not comprehensively establish a constitutional accountability mechanism specifically designed to address document forgery committed by public officials (Maccarthaigh, Painter, & Yee, 2016). As a result, uncertainty frequently arises regarding the competent institution, the applicable legal procedure, and the relationship between criminal responsibility and constitutional or administrative accountability.

Another significant challenge concerns the verification process itself. Electoral management bodies generally conduct formal administrative examinations based on the completeness of submitted documents rather than verifying their substantive authenticity through integrated governmental databases. Consequently, forged documents may remain undetected until after an individual has assumed public office (Melo & Fernandes de Lima, 2024). This situation reflects institutional weaknesses in administrative supervision and demonstrates the need for stronger coordination among agencies responsible for education records, civil registration, electoral administration, and public oversight.

Previous studies have predominantly examined document forgery from criminal law, forensic evidence, or electoral dispute perspectives. Comparatively limited scholarly attention has been devoted to constitutional accountability arising from forged documents submitted by public officials, particularly regarding the legal consequences for the validity of administrative decisions and the constitutional legitimacy of public office (Hohnerlein, 2024). This research therefore seeks to address that gap by examining the constitutional dimensions of document forgery and identifying legal mechanisms capable of safeguarding public trust and ensuring compliance with constitutional principles.

Accordingly, this study addresses two principal research questions. First, what forms of constitutional law accountability may be imposed on public officials who submit forged documents? Second, how should administrative verification mechanisms and constitutional sanctions be implemented to ensure legal certainty, accountability, and protection of democratic governance? By answering these questions, this study proposes a constitutional framework that integrates administrative responsibility, judicial control, and institutional coordination to strengthen the integrity of public administration and uphold the rule of law in Indonesia.

2. METHODS

This study employs a normative legal research approach, which examines legal issues through statutory provisions, legal doctrines, judicial decisions, and scholarly literature. Normative legal research is considered appropriate because the primary focus of this study is to analyze the constitutional and administrative accountability of public officials involved in document forgery by interpreting existing legal norms rather than investigating empirical social phenomena.

The research applies three complementary approaches. First, the statutory approach examines the legal framework governing public administration, constitutional accountability, and document authenticity in Indonesia. The principal legal materials include the 1945 Constitution of the Republic of Indonesia, Law Number 30 of 2014 concerning Government Administration, Law Number 7 of 2017 concerning General Elections, the Indonesian Criminal Code, and regulations issued by the General Elections Commission (KPU) concerning candidate verification procedures. These legal instruments are analyzed to identify the constitutional basis and administrative consequences of submitting forged official documents.

Second, the conceptual approach is employed to examine legal doctrines and constitutional principles relevant to the study. Particular attention is given to the principles of legality, accountability, transparency, good governance, and the *contrarius actus* doctrine, which recognizes the authority of an administrative body to revoke or annul its own administrative decisions when legal defects are subsequently identified. These concepts provide the theoretical foundation for evaluating constitutional responsibility beyond the scope of criminal liability.

Third, the case approach is utilized to examine selected judicial decisions concerning administrative disputes, candidate eligibility, and constitutional review related to public office qualifications. Relevant decisions of the Constitutional Court (*Mahkamah Konstitusi*) and the State Administrative Court (*Pengadilan Tata Usaha Negara*) are analyzed to understand how Indonesian courts interpret administrative legality and constitutional accountability in cases involving disputed official documents.

The study relies exclusively on secondary legal materials, consisting of primary legal sources such as statutes and judicial decisions, secondary sources including academic books, peer-reviewed journal

articles, legal commentaries, and official government publications, as well as tertiary materials such as legal dictionaries and encyclopedias that support the interpretation of legal concepts. These materials were collected through an extensive literature review and systematic document analysis.

Data were analyzed qualitatively using grammatical, systematic, and teleological methods of legal interpretation. Grammatical interpretation was employed to examine the ordinary meaning of statutory provisions, systematic interpretation was used to understand the relationship among constitutional and administrative regulations within the broader legal system, and teleological interpretation was applied to identify the legislative purpose underlying legal norms concerning public accountability and administrative integrity. The findings were then synthesized to formulate a comprehensive framework of constitutional law accountability for public officials who submit forged documents, while emphasizing legal certainty, institutional responsibility, and the protection of democratic governance.

3. FINDINGS AND DISCUSSION

Findings

The findings of this study reveal that Indonesia's constitutional and administrative legal framework does not provide a single, comprehensive mechanism for addressing document forgery committed by public officials. Instead, legal accountability is dispersed across several statutory regimes, including constitutional law, administrative law, criminal law, and electoral law. This fragmented regulatory structure creates uncertainty regarding institutional authority, verification procedures, and legal consequences when forged documents are discovered before or after a public official assumes office.

The analysis of statutory provisions, judicial decisions, and legal doctrines identifies three principal findings. First, administrative accountability constitutes the primary constitutional response to document forgery involving public officials. Second, the authority to revoke administrative decisions based on the *contrarius actus* principle serves as an important mechanism for restoring administrative legality. Third, judicial review before the State Administrative Court provides legal protection for citizens seeking to challenge administrative decisions issued on the basis of invalid or forged documents.

3.1. Constitutional Position of Administrative Documents in Public Office

The study finds that administrative documents submitted during the nomination or appointment process possess constitutional significance because they determine the legality of an individual's eligibility to hold public office. Educational certificates, identity documents, and other statutory requirements are not merely administrative formalities but constitute legal evidence demonstrating compliance with constitutional and legislative qualifications.

The review of Indonesian legislation indicates that every candidate for public office must satisfy objective administrative requirements established by applicable laws and implementing regulations. Consequently, the authenticity of these documents directly influences the validity of administrative decisions issued by competent state institutions.

The constitutional implications identified in this study include:

1. The legality of public office depends upon compliance with statutory administrative requirements.
2. Authentic administrative documents form part of the constitutional legitimacy of governmental authority.
3. Forged documents may invalidate the legal basis upon which administrative decisions are issued.

Table 1 summarizes the constitutional functions of administrative documents identified in this study.

Table 1. Constitutional Functions of Administrative Documents in Public Office

Administrative Document	Constitutional Function	Legal Consequence if Forged
Educational Certificate	Demonstrates educational qualification	Potential annulment of appointment decision
Identity Document	Confirms legal identity of the candidate	Administrative invalidity
Supporting Documents	Eligibility Establish statutory eligibility	Administrative sanctions and judicial review

3.2. Forms of Constitutional Accountability

The research identifies three principal mechanisms through which constitutional accountability may be imposed when forged documents are used by public officials. The first mechanism consists of administrative sanctions imposed by the competent administrative authority in accordance with applicable legislation governing public administration and public office.

The second mechanism is the revocation or annulment of administrative decisions under the *contrarius actus* doctrine. Under this principle, the administrative authority that issued an appointment or certification decision possesses the authority to revoke that decision upon discovering that it was based on unlawful or fraudulent documentation. The third mechanism involves judicial review before the State Administrative Court (PTUN). Citizens whose constitutional rights or public interests are adversely affected may challenge administrative decisions that were issued on the basis of forged documents. The identified accountability mechanisms are summarized in Table 2.

Table 2. Constitutional Accountability Mechanisms

Accountability Mechanism	Responsible Institution	Legal Basis	Primary Objective
Administrative Sanctions	Government Administrative Authority	Government Administration Law	Administrative discipline
Revocation of Administrative Decision (<i>Contrarius Actus</i>)	Issuing Administrative Authority	Principle of <i>Contrarius Actus</i>	Restoration of legality
Judicial Review before PTUN	State Administrative Court	State Administrative Court Law	Judicial control of administrative action

3.3. Institutional Verification of Official Documents

Another important finding concerns the institutional verification process implemented by state agencies. The analysis demonstrates that existing verification mechanisms primarily focus on the formal completeness of submitted documents rather than their substantive authenticity.

Several government institutions possess partial authority over document verification; however, their responsibilities remain fragmented. Educational databases, civil registration systems, electoral administration, and public oversight institutions operate independently with limited interoperability. Consequently, forged documents may not be detected during the nomination process.

The findings indicate that current verification practices exhibit several institutional limitations:

1. Verification procedures are predominantly administrative and documentary.
2. There is no fully integrated national verification platform connecting relevant government databases.
3. Institutional coordination among supervisory bodies remains limited.
4. Material verification frequently occurs only after legal disputes arise.

3.4. Legal Gaps in Constitutional Accountability

The final finding concerns the existence of regulatory and institutional gaps that reduce the effectiveness of constitutional accountability mechanisms.

Although criminal law criminalizes document forgery, constitutional and administrative legislation does not specifically regulate a comprehensive accountability model applicable to public officials who obtain or maintain office through forged administrative documents. Existing legal provisions primarily regulate procedural requirements rather than establishing an integrated constitutional response when administrative fraud is subsequently discovered.

The research identifies four major legal gaps:

1. The absence of a unified legal framework governing constitutional accountability for document forgery.
2. Limited authority for substantive verification during administrative screening.
3. Lack of integrated digital verification among relevant state institutions.
4. Overlapping competencies between criminal justice institutions and administrative authorities.

These findings demonstrate that strengthening institutional coordination and improving administrative verification mechanisms are essential prerequisites for ensuring constitutional legitimacy, legal certainty, and public confidence in state institutions.

Discussion

This study demonstrates that document forgery committed by public officials cannot be viewed solely as a criminal offense because it also produces constitutional consequences. Forged administrative documents affect the legality of public office, undermine democratic legitimacy, and weaken public confidence in government institutions (Rosenbloom, 2022). Therefore, constitutional accountability must complement criminal liability to ensure that the exercise of public authority remains consistent with the rule of law (Alli, 2026; Simanungkalit & Vanny Vanny, 2025).

The findings answer the first research question by showing that constitutional accountability operates through three interrelated mechanisms: administrative sanctions, the revocation of administrative decisions under the *contrarius actus* principle, and judicial review before the State Administrative Court. These mechanisms do not replace criminal proceedings but function alongside them to restore constitutional legality and maintain institutional integrity.

This interpretation is consistent with constitutional theory, which emphasizes that governmental authority derives its legitimacy from lawful procedures rather than merely from political support. According to Sun, (2025), the rule of law requires every public office to be established and exercised in accordance with constitutional and statutory provisions. Consequently, appointments obtained through forged documents cannot be regarded as fully legitimate, even if criminal liability has not yet been established.

Previous studies have largely examined document forgery from the perspective of criminal law or forensic evidence. Comparatively little attention has been devoted to its constitutional implications, particularly regarding the validity of public office and administrative legitimacy (Pazhamalai, 2025). This study therefore extends existing scholarship by positioning document forgery as an issue of constitutional governance that requires integrated legal accountability rather than a purely punitive response (Ukey & Variath, 2023).

The findings further indicate that administrative sanctions represent the most immediate constitutional response once forged documents have been legally verified. Unlike criminal punishment, administrative sanctions aim to correct unlawful governmental actions and restore legal certainty within public administration. Their primary objective is to ensure that administrative decisions continue to comply with constitutional and statutory requirements.

An important mechanism supporting this objective is the *contrarius actus* principle, which authorizes an administrative body to revoke or annul its own decisions when legal defects are subsequently identified. In cases involving forged documents, this doctrine enables the issuing

authority to withdraw an appointment or administrative decision without waiting for the completion of criminal proceedings. Such authority strengthens the preventive function of administrative law in protecting constitutional legitimacy (Lindquist & Huse, 2017).

This interpretation reflects the broader principles of good governance, particularly legality, accountability, transparency, and legal certainty. Administrative authorities are expected not only to issue lawful decisions but also to correct them whenever new evidence reveals that the original decision was based on false or fraudulent information (Muñoz, 2025). Consequently, constitutional accountability requires continuous administrative supervision rather than a one-time verification process.

The present findings support previous administrative law scholarship that recognizes the importance of correcting defective administrative decisions. However, this study expands that perspective by emphasizing that the *contrarius actus* doctrine also serves as a constitutional safeguard (Pszczynski, 2020). Its function extends beyond procedural correction to preserving public trust and ensuring that governmental authority remains legally valid throughout the tenure of public officials.

The second research question concerns the effectiveness of existing verification mechanisms for official documents. The findings reveal that Indonesia's verification system remains fragmented because different government institutions maintain separate databases and verification procedures. As a result, administrative examinations frequently emphasize documentary completeness rather than the substantive authenticity of the submitted documents.

This institutional fragmentation creates significant constitutional risks. Forged documents may escape detection during the nomination process and only become the subject of legal disputes after an individual has assumed public office. Such situations not only prolong legal uncertainty but also reduce public confidence in electoral administration and constitutional governance.

The findings are consistent with international discussions on digital governance, which highlight the importance of integrated public databases in strengthening administrative accountability. Modern administrative systems increasingly rely on interoperability among government institutions to improve verification accuracy and prevent fraudulent practices (Yani, 2025). Therefore, constitutional accountability should also incorporate technological and institutional reforms capable of supporting more reliable administrative verification (Petrov, 2024; Koliba, 2025).

Compared with earlier studies that primarily evaluate administrative efficiency, this research demonstrates that ineffective verification mechanisms produce broader constitutional consequences. Weak coordination among electoral authorities, educational institutions, civil registration agencies, and oversight bodies ultimately affects the legality of governmental authority itself. Accordingly, institutional integration should be regarded as a constitutional necessity rather than merely an administrative improvement (Al'Anam & Prabowo, 2025; Hafidz, Fitri, Azam, Arifullah, & Wiranto, 2024).

The broader implication of this study is that constitutional accountability should prioritize preventive governance rather than relying exclusively on corrective legal action. Criminal prosecution remains essential for punishing unlawful conduct, yet it cannot by itself restore constitutional legitimacy once an individual has exercised public authority based on forged documents (Eko Satria, Nur, & Samsul, 2025; Kishan, 2025). Preventive administrative mechanisms therefore become equally important in protecting democratic institutions.

Strengthening institutional cooperation among the General Elections Commission (KPU), the Election Supervisory Agency (Bawaslu), the Ombudsman of the Republic of Indonesia, the Ministry of Education, and the Directorate General of Civil Registration would significantly improve the effectiveness of document verification. Integrated digital databases would enable substantive verification at an earlier stage, thereby reducing legal disputes and enhancing public confidence in governmental institutions (Loi & Spielkamp, 2021; Zapata, 2023).

From a theoretical perspective, this study contributes to the development of constitutional law by integrating constitutional accountability with administrative law principles. Rather than treating

document forgery solely as a criminal offense, this research demonstrates that constitutional legitimacy depends upon lawful administrative procedures, institutional accountability, and effective judicial oversight. These dimensions collectively reinforce the constitutional principle that public authority must always be exercised within the framework of legality.

Future research may expand this study by examining empirical implementation within electoral administration or by conducting comparative analyses with constitutional accountability models adopted in other democratic jurisdictions. Such comparative research would provide broader insights into how integrated verification systems and constitutional safeguards can further strengthen democratic governance and the rule of law.

4. CONCLUSION

This study examined the constitutional law accountability applicable to public officials who submit forged administrative documents and analyzed the effectiveness of existing verification and accountability mechanisms within Indonesia's constitutional framework. The findings demonstrate that constitutional accountability should not be limited to criminal prosecution, as document forgery directly affects the legality of public office, administrative legitimacy, and public trust in democratic institutions. A comprehensive accountability framework therefore requires the integration of administrative sanctions, the revocation of unlawful administrative decisions through the *contrarius actus* principle, and judicial review by the State Administrative Court to restore constitutional legality.

The study also reveals that Indonesia's current verification system remains institutionally fragmented, resulting in legal uncertainty and reducing the effectiveness of preventive oversight. Although various institutions possess partial authority to examine official documents, the absence of an integrated verification mechanism weakens the state's ability to detect forged documents before public officials assume office. Strengthening institutional coordination and digital interoperability among relevant government agencies is therefore essential to improving constitutional accountability and safeguarding the integrity of public administration.

The principal contribution of this research lies in its development of a constitutional law perspective that complements the existing criminal law approach to document forgery. By positioning administrative accountability as an essential component of constitutional governance, this study provides a broader legal framework for protecting democratic legitimacy, ensuring legal certainty, and reinforcing the rule of law. These findings may serve as a reference for policymakers in formulating more coherent regulations governing the verification of public officials' qualifications and the legal consequences of administrative fraud.

Future research is encouraged to adopt empirical or comparative approaches in order to evaluate the practical implementation of document verification mechanisms across public institutions and electoral processes. Comparative studies involving constitutional accountability models from other democratic jurisdictions may also provide valuable insights for strengthening Indonesia's administrative governance and institutional oversight.

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