

Implementation of Religious Marriage Registration Before and After the Issuance of SEMA Number 2 of 2023 at the Yogyakarta City District Court.

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ABSTRACT

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The issuance of SEMA has an impact on interfaith marriage couples in Indonesia, especially on marriage registration. It should be noted that marriage registration is mandatory to obtain administrative documents such as marriage certificates, family cards and others. Prior to the SEMA, the Yogyakarta City District Court had granted the application for registration of interfaith marriages. The existence of the legalization of interfaith marriages by the Yogyakarta City District Court which then comes SEMA Number 2 of 2023 which clearly and explicitly prohibits interfaith marriages is interesting to be studied further. This research uses empirical legal research method with legislative approach and case approach. The results of this study show the basis of the judge's consideration in granting the registration of interfaith marriages in the Yogyakarta City District Court, including judges assessing the existence of a legal vacuum, the potential for misuse of social values, and providing legal certainty for children of interfaith marriage couples. The judge's consideration in granting this case is contrary to the provisions of Article 2 paragraph (1) of the Marriage Law. The implementation of this SEMA makes interfaith marriages unable to be registered at the Yogyakarta City District Court. The validity of the registration of interfaith marriages that have been carried out remains valid and applicable because a regulation is not retroactive. The implementation of this SEMA can be declared effective as evidenced by the absence of requests for registration of interfaith marriages at the Yogyakarta City District Court.

1. Introduction

Marriage is expressly regulated in the Indonesian legal system through Law Number 1 of 1974 concerning Marriage, which was later amended by Law Number 16 of 2019. This law aims to provide legal certainty and solutions to various problems that may arise in the context of marriage in Indonesia. Article 2 paragraph (1) of the law states that a marriage is considered valid if it is conducted in accordance with the religion of the couple getting married. This indicates that couples of the same religion will have a strong legal basis for marriage. However, in the context of interfaith marriage, existing regulations tend to provide significant challenges. Article 8 letter (f) of the Marriage Law explicitly prohibits interfaith marriages (Muhyidin, 2019).

With this provision, it becomes difficult for interfaith marriages in Indonesia to be legally performed and registered. On the other hand, Law No. 24/2013 on Population Administration, particularly Article 35 letter (a), is considered to provide an opportunity for interfaith couples to register their marriages on the condition that there is a determination by the local court (Dewi Andriani, et al., 2023). This has encouraged a number of couples of different faiths to apply for marriage registration in court. Several court decisions have granted such applications, such as the number assignment 916/Pdt.P/2022/PN.Sby dan No. 12/Pdt.P/2022/PN.Ptk (Dhermawan, dkk, 2022).

The registration of interfaith marriages in Indonesia continues to increase, as shown by data from the *Indonesian Conference on Religion and Peace* (ICRP), which recorded 1,655 interfaith marriages until 2023. This phenomenon has led to controversy regarding the judge's decision to grant the registration, given the conflict of norms between the Marriage Law and the Population Administration Law. To respond to this situation, the Supreme Court on July 17, 2023 issued Supreme Court Circular Letter (SEMA) No. 2 of 2023 directing judges to reject applications for registration of interfaith marriages. This SEMA emphasizes that courts are not allowed to grant marriage registration applications involving couples of different religions (Hendrikus Suyatno, 2023).

The problem is that the existence of SEMA Number 2 of 2023 also still causes controversy. The important thing to question is related to SEMA which is compelling for judges, but SEMA Number 2 of 2023 has contradictions with Article 35 of the Population Administration Law which also still exists and is legally recognized today. Another legal problem is the legal effect of the issuance of the SEMA on the registration of marriages of different religions considering that there are still many potential applications for registration of marriages of different religions in Indonesia. The Yogyakarta City District Court is one of the institutions that had granted applications for registration of marriages of different religions before the issuance of SEMA Number 2 of 2023. Decisions such as Number 378/Pdt.P/2022/PN.Yyk and Number 141/Pdt.P/2023/PN.Yyk, Number 174/Pdt.P/2023/PN.Yyk, Number 180/Pdt.P/2023/PN.Yyk are the basis for seeing how this SEMA is implemented in the field. Therefore, this research is important to examine whether the Yogyakarta City District Court continues to comply with the provisions of SEMA Number 2 of 2023 in rejecting requests for registration of marriages of different religions, as well as assessing the legal validity of marriage registration that was carried out before the SEMA was enacted. This research will examine "The Implementation of Interfaith Marriage Registration Before and After the Issuance of SEMA Number 2 of 2023 in the District Court of Yogyakarta City" to provide a deeper understanding of the legal implications of this new regulation.

2. Method

This research uses empirical legal research, which aims to understand how the law works in real practice and see the law that occurs in the community. The approach used is a statutory approach and a case approach, with the aim of analyzing regulations related to interfaith marriages and examining cases of interfaith marriage registration, including several decisions of the Yogyakarta City District Court on applications for interfaith marriage registration. (Soerjono Soekanto & Sri Mamudji, 2010).

The data used consists of primary data and secondary data. Primary data was obtained through direct interviews with resource persons, namely Junior Associate Judges at the Yogyakarta City District Court and Policy Analysts for Civil Registration Services at the Yogyakarta City Population and Civil Registration Office. Secondary data includes laws and circulars, secondary legal materials in the form of supporting literature, and tertiary legal materials that provide additional explanations. Data collection techniques include structured interviews and literature studies. The data collected was then analyzed using qualitative analysis methods to produce a systematic and comprehensive understanding of the issues studied (Sugiyono, 2016).

3. Analysis or Result

3.1. Judges' Considerations in Granting the Registration of Interfaith Marriages at the Yogyakarta City District Court

Marriage is one of the fundamental human needs that is juridically regulated in Indonesia through Law Number 1 of 1974 concerning Marriage (Tinuk, 2020). However, religious differences in marriage often cause complex problems. In Indonesia, the Marriage Law does not explicitly regulate marriages of different religions, Article 2 paragraph (1) of the Marriage Law leaves it entirely to the religious law of each party (Dany, 2022). However, problems then arise when Article 35 letter (a) of the Population Administration Law is considered to provide an opportunity for interfaith couples to register their marriages on the condition of obtaining a prior determination from the court (Dewi, 2023). Interfaith marriages occur in the city of Yogyakarta, as reported by the Indonesian Supreme Court Decision Directory data, there are 4 court decisions, namely Stipulation Number 378/Pdt.P/2022/PN Yyk, Stipulation Number 141/Pdt.P/2023/PN Yyk, Stipulation Number 174/Pdt.P/2023/PN Yyk, and Stipulation Number 180/Pdt.P/2023/PN Yyk. The process of registering interfaith marriages in Yogyakarta faces challenges, both in terms of legal recognition and social acceptance. In addition to requiring approval from their respective religious institutions, couples must also obtain a court order.

Marriages of different religions, such as those in Yogyakarta City, often face norm conflicts between the Marriage Law and the Population Administration Law. Article 2 paragraph (1) of the Marriage Law requires marriage to be conducted in accordance with the religion of each partner, which often becomes an obstacle to legal recognition for interfaith marriages. On the other hand, Article 35 letter (a) of the Population Administration Law requires civil registration and official documents to recognize the status of interfaith marriages. This has implications for interfaith marriage couples including difficulties in obtaining marriage certificates, impacts on legal and administrative rights, and social challenges for the couples involved who often face stigma and rejection from both the community and official institutions such as the Population Office. The application for a different religion marriage registration is one of the solutions taken by couples of different religions to obtain their rights. Marriage registration is theoretically an official process by the government to produce a marriage certificate as authentic evidence in the form of a marriage certificate (Rachmadi, 2019). However, problems arise when the registrar is reluctant to issue a marriage certificate because it is not in accordance with Article 2 of the Marriage Law and there are no clear procedures in Government Regulation No. 9 of 1975 implementing Law No. 1 of 1974 on marriage (Zamroni, 2019). As a result, interfaith couples often apply to judges for a decree in lieu of a certificate. In the Yogyakarta City District Court, there are four court decisions on the registration of interfaith marriages. The factors behind the application for registration of interfaith marriages at the Yogyakarta City District Court are as follows:

Table 1. Factors in Filing an Application for Recording a Non-Religious Marriage at the Yogyakarta District Court

Court Stipulation Number	Application Submission Factor
378/Pdt.P/2022/PN Yyk	The applicants have different religions (Islam and Catholicism), to be able to apply for a marriage certificate and the identity of the child born
141/Pdt.P/2023/PN Yyk	The applicants are of different religions (Islam and Catholicism), to obtain a marriage certificate or state recognition of the marriage
174/Pdt.P/2023/PN Yyk	The applicants are of different religions (Catholic and Christian), to be able to issue a marriage certificate for a marriage that has already taken place.
180/Pdt.P/2023/PN Yyk	Petitioners of different religions (Catholic and Christian), to be able to register a marriage at the population and civil registry office

Source: Secondary Data, processed 2024

Based on the above decision of the Yogyakarta City District Court regarding the registration of marriages of couples with different religions, it can be concluded that the applicants faced difficulties in registering marriages at administrative agencies due to their different religions. The Yogyakarta City District Court, based on the available evidence and testimony, has granted the petitioners' request by affirming that religious differences do not prevent administrative registration after obtaining a court decision.

The determination of the registration of marriages of different religions in the Yogyakarta District Court certainly cannot be separated from the judge's consideration. The judge's consideration plays a crucial role. Judges must balance the applicable legal provisions in the Marriage Law and the Population Administration Law and consider the principle of social justice for interfaith marriage couples. These considerations often include an assessment of the validity and compatibility of religious documents, the legitimacy of the marriage according to different religious norms, as well as the legal impacts that may arise for the couple and their offspring. In addition, judges must also consider the social and cultural aspects that affect the community's acceptance of the interfaith marriage.

Table 2: Judges' Considerations at the Yogyakarta City District Court

Stipulation Number	Judges' Consideration	Legal Basis for Judges' Consideration
378/Pdt.P/2022/PN Yyk	To provide legal certainty for children and marriages entered into by the applicants; to prevent legal smuggling.	-
141/Pdt.P/2023/PN Yyk	There is a legal vacuum related to interfaith marriages in Indonesia and to prevent deviations in social values such as cohabitation or living together without a legal marriage bond	-
174/Pdt.P/2023/PN Yyk	There is a legal vacuum and it is feared that it will lead to deviations in social values such as living together without a marriage bond.	-
180/Pdt.P/2023/PN Yyk	There is conformity between the letters of evidence and the testimonies of witnesses (successfully proving the arguments of the petition).	Article 35 of Law Number 23 of 2006 concerning Population Administration

Source: Secondary Data, processed 2024

The author's analysis of the four cases is that judges have different views in granting the application for registration of interfaith marriages. First, the judges assessed the legal vacuum of interfaith marriage. If examined further, interfaith marriage in Indonesia is not allowed as stipulated in Article 2 paragraph (1) of the Marriage Law. Therefore, this condition

cannot be declared as a legal vacuum. Second, judges are concerned about the misuse of social values such as cohabitation. This consideration is like a double-edged knife because the more interfaith marriages that are granted, the more interfaith marriages in Indonesia. Third, the judge's step in providing legal certainty to children born from interfaith marriages, given that this consideration cannot apply to all applicants for interfaith marriage registration.

In the judge's consideration, there is a conflict of norms between Article 2 paragraph (1) of the Marriage Law and Article 35 letter (a) of the Population Administration Law. This is what then led to the large number of applications for registration of interfaith marriages as occurred in the Yogyakarta City District Court. It should be noted that judges in granting applications for registration of interfaith marriages do not always explicitly and clearly consider the articles where there is a conflict of norms. Despite the conflict of norms, judges should further consider the rule of law and social norms prevailing in society in order to minimize the increasing number of interfaith marriages in Indonesia.

3.2. Implementation of SEMA Number 2 Year 2023 on the validity of recording interfaith marriages at the Yogyakarta City District Court

The issuance of Supreme Court Circular Letter Number 2 of 2023 concerning Guidelines for Judges in Adjudicating Cases of Application for Registration of Interfaith Marriages and Beliefs clearly closes the gap that has been wide open especially since the enactment of Law 23 of 2006 concerning Population Administration. This is because the justification that has been used by judges in deciding on interfaith marriages lies in Article 35 letter a of Law Number 23/2006 on Population Administration. It should be noted that the power of SEMA for the internal Supreme Court of Indonesia is as a guideline or interpretative guide issued by the Supreme Court to establish legal practices in courts throughout Indonesia (Bintang, 2023).

The substance of SEMA Number 2 Year 2023 stipulates that a marriage is considered valid if it is carried out in accordance with the religious laws and beliefs of each party, as stipulated in Law Number 1 Year 1974 concerning Marriage. Courts are not allowed to grant requests for marriage registration between couples with different religions and beliefs. This SEMA provides guidance to judges on how to adjudicate cases of marriage registration between people of different religions and beliefs. Therefore, if a judge violates it, he or she may be subject to sanctions under the judge's code of ethics. In addition, registrar and secretarial officials who violate it will be subject to disciplinary punishment according to the violation committed.

Bagir Manan argues that the binding legal force of SEMA is not directly legally binding, but contains legal relevance. Policy regulations are addressed to the state administration itself so that the first to implement

the provisions are state administrative bodies or officials. Therefore, policy regulations such as SEMA cannot affect the general public but are internally binding (Ridwan, 2011). The existence of SEMA is expected to help minimize differences of opinion or different legal interpretations. Therefore, judges who handle interfaith marriage cases should be obliged to follow the provisions of the SEMA. After the issuance of SEMA No. 2 of 2023, the Yogyakarta City District Court has not received any requests for registration of interfaith marriages. Based on an interview conducted by the author, the judge of the Yogyakarta District Court stated as follows: "After the issuance of the SEMA, there have been no requests for registration of interfaith marriages. If there is an application later, the court may not reject the application. The court will still accept the application but the judge will decide by referring to the applicable laws and regulations. Since the existence of SEMA Number 2 Year 2023, it is clear that judges are prohibited from granting registration of interfaith marriages. So it is mandatory for the judge to reject the application" (Djoko, 2024).

From the results of the interviews above, it can be concluded that the judges of the Yogyakarta District Court apply the provisions of Supreme Court Circular Letter Number 2 of 2023 concerning Guidelines for Judges in Adjudicating Cases of Application for Registration of Interfaith Marriages and Beliefs by not granting applications for interfaith marriages. This is because judges are obliged to follow the applicable statutory provisions and implement the SEMA.

The author also conducted an interview at the Population and Civil Registry Office of Yogyakarta City, considering that the Population Office is the institution that plays a role in registering interfaith marriages after being legalized by the District Court. "It is true that in the city of Yogyakarta after the presence of SEMA, there is no registration. We don't really understand whether or not there is a submission at the Yogyakarta City District Court. We can assure you that since the issuance of SEMA, the Dispenduk of Yogyakarta City has not handled the registration of interfaith marriages. If there is a case that needs to be registered, we will obviously consider it because the SEMA has rejected it. But again, the Dispenduk is only authorized to record, not legalize" (Nur Kumala, 2024). Based on the results of the interview, it can be seen that the Yogyakarta City Dispenduk has not handled the registration of interfaith marriages after the presence of SEMA Number 2 Year 2023. The registration of interfaith marriages after the presence of Supreme Court Circular Letter Number 2 of 2023 concerning Instructions for Judges in Adjudicating Cases of Application for Registration of Interfaith Marriages and Beliefs certainly has legal implications or legal consequences. Legal consequences can be explained as the result of legal actions taken by a person against a legal object, or other impacts arising from a certain event that has been regulated by law to produce legal consequences (Jane, 2013). The legal consequences of the stipulation of recording a marriage of

different religions are related to whether or not the marriage can be registered. In addition, the legal consequences of this marriage determination are also found in the rights and obligations of husband and wife, marital property, and inheritance issues in the context of interfaith marriages (Mardalena, 2023).

The judge's decision to grant the registration of an interfaith marriage certainly has legal consequences for both the couple and other parties. For couples in an interfaith marriage that is granted by the judge as found in the Stipulation of the North Jakarta District Court Number 423/Pdt.P/2023/PN Jkt. Utr, as a result of the marriage registration, there are rights and obligations between husband and wife that must be fulfilled. Articles 30 to 34 of the Marriage Law regulate the rights and obligations between husband and wife as a result of marriage. The details of the rights and obligations as a legal consequence of the determination of the registration of interfaith marriages are as follows:

- a. Article 31 of the Marriage Law
 - 1) The rights and position of the wife are equal to the rights and position of the husband in household life and social life together in society.
 - 2) Each party is entitled to perform legal acts.
 - 3) The husband is the head of the family and the wife is the housewife.
- b. Article 32 of the Marriage Law
 - 1) Husband and wife must have a fixed place of residence.
 - 2) The residence referred to in paragraph (1) of this article shall be determined by the husband and wife together.
- c. Article 33 of the Marriage Law which states that husband and wife must love each other, respect, be loyal and provide physical and mental assistance to one another.
- d. Article 34 of the Marriage Law
 - 1) The husband is obliged to protect his wife and provide all the necessities of household life according to his ability.
 - 2) The wife is obliged to manage household affairs as well as possible.
 - 3) If the husband and wife neglect their obligations, each of them can file a lawsuit with the Court.

The stipulation of interfaith marriage granted by the judge has legal consequences for the couple, including the rights and obligations of husband and wife and the legal status of children born from the marriage. If the registration of an interfaith marriage is not granted, then the marriage cannot be legally registered. As a result, the couple does not have rights and obligations recognized by law, such as inheritance rights or rights to joint property. In addition, children born from unregistered marriages only have a legal relationship with their mother and are considered as out-of-wedlock children. However, SEMA Number 2 Year 2023 does not apply retroactively, so that interfaith marriages that have

been registered before the enactment of the SEMA are still recognized as legal and valid according to state law. Couples who had registered their marriages before the SEMA are still legally recognized as husband and wife, and their rights and obligations, such as inheritance rights, rights to joint property, and rights in public administration, are still recognized. Children born from marriages that were registered prior to the SEMA also continue to have their legal status fully recognized, including their rights to inheritance, surnames, and legal protection (Ida, 2016).

Furthermore, all official documents that have been issued based on marriage registration before the SEMA, such as marriage certificates and child birth certificates, remain valid and applicable. Couples who have married differently before the SEMA are still eligible for services and benefits provided to married couples, such as health insurance, retirement benefits, and spousal visa rights. Court decisions that have recognized the validity of interfaith marriages prior to this SEMA also remain valid and will not be modified by the new regulation.

Thus, SEMA No. 2 of 2023 is binding on judges hearing cases of interfaith marriages, obliging them to refuse registration of such marriages. However, this SEMA has no retroactive effect, so that interfaith marriages that were registered before the SEMA remain valid and recognized by the law. However, the registration of interfaith marriages can no longer be done after the enactment of the SEMA, given the substance of the SEMA which prohibits judges from granting requests for registration of interfaith marriages.

4. Conclusion

Based on the results of the analysis that has been described, this study concludes as follows:

- a. This research shows that prior to the issuance of SEMA Number 2 Year 2023, judges at the Yogyakarta City District Court granted the registration of interfaith marriages with the consideration of a legal vacuum, potential misuse of social values, and legal certainty for children of interfaith couples. However, this decision contradicts Article 2 paragraph (1) of the Marriage Law and has the potential to encourage an increase in the number of interfaith marriages in Indonesia. After the enactment of SEMA Number 2 Year 2023, the registration of interfaith marriages can no longer be done at the Yogyakarta City District Court, but the registration documents that have existed before the SEMA remain valid because the regulation is not retroactive.
- b. The implementation of this SEMA can be declared effective because there are no more applications for registration of interfaith marriages submitted at the Yogyakarta District Court, and judges firmly reject the application in accordance with applicable regulations. The public is urged not to enter into an interfaith marriage because it cannot be legally registered, which has an impact on the marital status and children of the marriage. The

government is expected to issue firmer regulations and provide clear solutions to overcome the phenomenon of interfaith marriages in Indonesia.

5. Suggestions

Suggestions that the author can convey from this research include the following points:

- a. For judges in the District Court who handle cases of applications for registration of different religions, it is hoped that they will comply with the rules of SEMA Number 2 of 2023 by not granting the application.
- b. For the community, it is expected not to enter into an interfaith marriage considering that the marriage cannot be registered and will have an impact on the marriage and children of the marriage.
- c. For the government, it is expected to provide firmness on the prohibition of interfaith marriages through higher regulations such as laws. The government is also expected to provide a solution to the phenomenon of interfaith marriage that still often occurs in Indonesia.

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