Juridical Analysis of the Validity of the Vice President's Educational Certificate Equivalency Letter Following Supreme Court Decision Number 742 K/Tun/2026 From the Perspective of Legal Certainty znd State Administrative Law

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This study aims to analyze the validity of Certificate Number 9149/D.D1/KS/2019 concerning the equivalency of senior secondary education belonging to Gibran Rakabuming Raka, based on administrative law provisions and the principle of legal certainty. It also examines the legal implications of Supreme Court Decision Number 742 K/TUN/2026 regarding the fulfillment of educational requirements for vice-presidential candidacy and the constitutional position of the Vice President within Indonesia's constitutional system. This research employs normative legal research using statutory, case, and conceptual approaches. The legal materials consist of primary, secondary, and tertiary sources collected through library research and analyzed qualitatively using prescriptive and argumentative legal reasoning. The findings indicate that the validity of an educational equivalency certificate must be examined based on the principles of legality, the authority of the issuing official, procedural compliance, substantive requirements, and the General Principles of Good Governance (Asas-Asas Umum Pemerintahan yang Baik), as stipulated in Law Number 30 of 2014 concerning Government Administration. Furthermore, the legal implications of Supreme Court Decision Number 742 K/TUN/2026 must be distinguished between the administrative consequences affecting the educational equivalency document and the constitutional consequences concerning the position of the Vice President. The annulment or invalidation of an administrative document does not automatically invalidate election results or result in the dismissal of the Vice President, since the dismissal of state officials must follow the constitutional procedures stipulated in Articles 7A and 7B of the 1945 Constitution of the Republic of Indonesia. This study emphasizes the importance of legal certainty, administrative accountability, and consistency in the distribution of state institutional authority to maintain the legitimacy of public office under the rule of law.

Keywords: Administrative Validity, Educational Certificate Equivalency, Legal Certainty, Vice President, Administrative Law.

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1. Introduction

Indonesia is a state governed by the rule of law, as explicitly stipulated in Article 1(3) of the 1945 Constitution of the Republic of Indonesia. This constitutional principle requires every exercise of governmental authority to be grounded in valid legal provisions, including the issuance of administrative decisions and the determination of eligibility for public office. The rule of law encompasses legal certainty, justice, transparency, and accountability, ensuring that administrative actions are performed within the limits of statutory authority. From the perspective of Gustav Radbruch's legal philosophy, legal certainty constitutes one of the fundamental objectives of law, alongside justice and utility. These principles provide a normative foundation for evaluating the legality of governmental decisions and their implications for

constitutional governance[1][2]. In administrative law, legal certainty requires not only the formal existence of government documents but also compliance with the authority, procedures, and substantive requirements governing their issuance. Accordingly, administrative decisions used to establish eligibility for constitutional office must be examined through applicable legal standards to ensure that their legal consequences are legitimate and accountable.

Educational qualifications constitute a statutory requirement for presidential and vice-presidential candidates under Article 169(r) of Law Number 7 of 2017 concerning General Elections[3]. This provision establishes a minimum educational qualification equivalent to senior secondary education. However, applying this requirement to individuals educated abroad presents specific legal challenges because educational systems, certification standards, and qualification recognition procedures differ across countries. The recognition of foreign educational qualifications must therefore be distinguished from the verification of electoral eligibility. The former concerns the administrative determination of educational equivalency, while the latter falls within the statutory responsibilities of electoral institutions. Ismaidar et al. (2026) examine legal interpretation and reasoning in determining the equivalency of foreign educational qualifications for executive candidacy, emphasizing the importance of consistent legal interpretation in applying educational eligibility requirements. Nevertheless, the question of educational equivalency also requires an examination of whether the administrative instrument recognizing such qualifications was issued by an authorized official, followed legally prescribed procedures, and was supported by sufficient evidence of educational completion. These requirements are particularly significant when educational equivalency documents are subsequently used as evidence of compliance with statutory candidacy requirements.

The legal assessment of an educational equivalency certificate must be based on the regulatory framework applicable when the administrative document was issued. In the present case, the relevant date is August 6, 2019, when Certificate Number 9149/D.D1/KS/2019 was issued by the Director General of Primary and Secondary Education. The applicable statutory framework includes Law Number 20 of 2003 [4] concerning the National Education System and Law Number 30 of 2014 concerning Government Administration[5]. Article 52 of Law Number 30 of 2014 establishes three essential requirements for the validity of administrative decisions: issuance by an authorized official, compliance with the prescribed procedures, and substantive conformity with the object of the decision. These requirements must be interpreted in conjunction with the General Principles of Good Governance (Asas-Asas Umum Pemerintahan yang Baik, AUPB), particularly legal certainty and careful administrative decision-making. At the operational level, the Ministry of Education and Culture administered an educational equivalency service for Indonesian citizens who had completed primary or secondary education abroad and obtained relevant educational certificates or equivalent completion documents (Secretariat of the Directorate General of Primary and Secondary Education, 2020). Nevertheless, administrative service guidance must be distinguished from binding legislation, and the specific implementing provisions applicable on August 6, 2019, must be established through their legal status and effective dates. Regulations introduced after that date cannot automatically be applied retrospectively to determine the legality of the certificate's issuance.

The controversy surrounding Certificate Number 9149/D.D1/KS/2019 concerns the recognition of Gibran Rakabuming Raka's foreign educational qualifications as equivalent to Indonesian senior secondary education. The central legal issue is not limited to the existence of the certificate but extends to the authority of the issuing official, the verification of supporting educational records, the adequacy of evidence demonstrating educational completion, and the substantive basis for granting equivalency. These concerns acquired judicial significance through Supreme Court Decision Number 742 K/TUN/2026, dated October

30, 2026, which annulled the disputed certificate and required the issuing administrative authority to revoke it[6]. The decision raises a fundamental question concerning the application of administrative legality standards to educational equivalency determinations and the extent to which defects in administrative verification affect the legal validity of the resulting document. Djou et al[7] emphasize that government officials are accountable for administrative decisions that violate the General Principles of Good Governance. Consequently, the present case provides a specific context for examining whether the legal deficiencies identified through judicial review concern administrative authority, procedural compliance, substantive evidentiary sufficiency, or a combination of these elements.

Previous studies provide relevant but distinct perspectives on the legal issues examined in this research. Ismaidar et al[8] focus on legal interpretation and judicial reasoning concerning the equivalency of foreign educational qualifications for executive candidacy under electoral legislation. Their analysis contributes to understanding the interpretation of educational requirements but does not, within the scope addressed in the present study, resolve the specific administrative validity of Certificate Number 9149/D.D1/KS/2019 in light of Supreme Court Decision Number 742 K/TUN/2026. Prasna et al[9] address the constitutionality of educational requirements for presidential and vice-presidential candidates, providing a normative basis for understanding educational eligibility as a constitutional and electoral issue. However, constitutional recognition of educational eligibility requirements does not itself determine the legal consequences of annulling an individual educational equivalency certificate after the completion of an electoral process. Meanwhile, Wora et al[10] examine jurisdictional boundaries involving administrative judicial authority and constitutional adjudication. Although this perspective is relevant to institutional competence, the specific relationship between administrative judicial annulment, the verification responsibilities of electoral institutions, and the constitutional status of an inaugurated Vice President requires further analysis. These differences identify a research gap concerning the legal consequences of an administrative certificate annulment across interconnected but institutionally distinct legal processes.

The novelty of this study therefore lies not merely in combining state administrative law and constitutional law but in developing a case-specific normative analysis of the relationship between administrative validity, educational eligibility, and constitutional consequences. Three legal issues distinguish the present research from the preceding studies. First, the research examines the validity of Certificate Number 9149/D.D1/KS/2019 by applying the requirements of administrative authority, procedural compliance, substantive evidentiary sufficiency, and good governance to the regulatory framework applicable at the time of its issuance. Second, it analyzes the legal reasoning and operative ruling of Supreme Court Decision Number 742 K/TUN/2026 to distinguish the annulment of an administrative instrument from a separate determination of the certificate holder's underlying educational qualifications and electoral eligibility. Third, it examines the institutional boundaries governing the legal effects of an administrative judicial ruling, particularly the distinct responsibilities of the educational authority, the General Elections Commission, the Supreme Court, and the Constitutional Court. Constitutional Court Decision Number 01/PHPU.PRES-XXIV/2026 [11] is considered within this framework to distinguish judicial considerations from the binding operative judgment and to identify the limits of constitutional adjudication. Through this analytical framework, the study seeks to clarify how administrative judicial remedies interact with electoral eligibility verification and constitutional accountability without presuming that a ruling concerning one legal object automatically determines all related legal questions.

Based on these considerations, this study aims to analyze the legal validity of Certificate Number 9149/D.D1/KS/2019 concerning the equivalency of Gibran Rakabuming Raka's foreign education under Indonesian state administrative law and the principle of legal certainty. Specifically, it examines the issuing

authority, applicable regulatory requirements, administrative procedures, substantive supporting evidence, and compliance with the General Principles of Good Governance. Furthermore, the study investigates the juridical implications of Supreme Court Decision Number 742 K/TUN/2026 for educational eligibility requirements in vice-presidential candidacy and the constitutional position of the Vice President. The analysis distinguishes the legal consequences affecting an administrative certificate from those associated with electoral verification, election results, and constitutional mechanisms for public office. As Riza [12] explains, the legal characterization of administrative decisions is essential for determining their validity and consequences within the administrative judicial system. Accordingly, this research contributes to administrative and constitutional legal scholarship by establishing a more precise analytical distinction between administrative legality, evidentiary recognition of educational qualifications, electoral eligibility, and the constitutional accountability of elected public officials.

2. Literature Review And Problem Statement

Legal Certainty in State Administrative Law

Legal certainty in state administrative law concerns the predictability, consistency, and enforceability of governmental decisions within established legal boundaries. Rather than being limited to formal compliance with statutory provisions, legal certainty requires administrative actions to produce legally justifiable consequences while protecting the rights of affected parties. Gustav Radbruch's legal philosophy places legal certainty alongside justice and utility as fundamental objectives of law. However, these objectives may generate tension when the formal recognition of an administrative decision conflicts with substantive justice or the protection of individual rights. Putro and Bedner[1] provide a legal-philosophical perspective on the relationship between legal principles and substantive legal objectives, while Riza [12] examines the legal characteristics of state administrative decisions and their consequences under Indonesian administrative law. These perspectives establish an important distinction between the formal existence of an administrative instrument and its substantive conformity with applicable legal requirements.

In the context of educational equivalency certificates, legal certainty involves two interrelated dimensions. The first is normative certainty, which requires identifiable legal authority, applicable regulations, and consistent administrative procedures. The second is consequential certainty, which concerns the legal status of an administrative document and the effects of its subsequent judicial annulment. These dimensions are particularly relevant when a certificate initially issued for educational recognition is subsequently used to establish eligibility for constitutional public office. Accordingly, this study employs legal certainty as an analytical framework for determining whether administrative recognition has a valid legal foundation and whether its judicial annulment produces consequences limited to the administrative document or extending to other legally distinct determinations. This framework prevents the presumed validity of a formally issued certificate from being confused with a conclusive determination of its substantive legality.

Validity of Government Administrative Decisions

The validity of government administrative decisions is principally determined through the relationship between lawful authority, procedural compliance, and substantive conformity. Article 52 of Law Number 30 of 2014 concerning Government Administration provides the normative foundation for examining these requirements. From a doctrinal perspective, administrative authority must be distinguished according to its legal source, namely attribution, delegation, or mandate. Attribution establishes authority directly through constitutional or statutory provisions, delegation involves the transfer of governmental authority under

legally prescribed conditions, and mandate concerns the exercise of authority on behalf of the competent official without necessarily transferring responsibility in the same manner as delegation. Jabar et al[13] examine the juridical dimensions of delegation and mandate, highlighting the importance of identifying the legal source and limits of administrative decision-making authority. Their perspective is relevant to determining whether an educational equivalency certificate was issued by an official possessing the requisite authority under the regulations applicable at the time of issuance.

The requirements of administrative validity must also be distinguished from the consequences of administrative irregularities. Procedural validity concerns compliance with legally prescribed stages of administrative decision-making, whereas substantive validity concerns the correspondence between the content of a decision, its factual foundation, and applicable legal requirements. Djou et al[7] emphasize the accountability of government officials for decisions that violate the General Principles of Good Governance (Asas-Asas Umum Pemerintahan yang Baik, AUPB), while Riza[12] discusses the legal characterization of administrative decisions within the administrative judicial framework. These perspectives provide complementary analytical approaches: the former emphasizes administrative accountability and adherence to good governance principles, whereas the latter supports the classification and assessment of administrative decisions according to their legal characteristics. For this study, these doctrines establish three criteria for examining Certificate Number 9149/D.D1/KS/2019: the legal authority of the issuing official, compliance with applicable verification and issuance procedures, and the sufficiency of the substantive evidence supporting educational equivalency. Any identified irregularity must subsequently be assessed according to its legal significance rather than presumed to produce identical consequences in every circumstance.

Educational Equivalency and Constitutional Eligibility Requirements

Educational equivalency involves a legal distinction between the recognition of foreign educational qualifications and the determination of eligibility for constitutional public office. Administrative recognition concerns whether educational qualifications obtained abroad correspond to the standards prescribed within Indonesia's national education system. Electoral eligibility, by contrast, concerns whether a candidate satisfies the requirements established under electoral legislation, including Article 169(r) of Law Number 7 of 2017 concerning General Elections. These two determinations are legally connected but institutionally distinct because educational authorities assess equivalency, whereas electoral institutions evaluate compliance with candidacy requirements. Consequently, the legal recognition of a foreign qualification should not be treated as identical to the subsequent administrative determination of a candidate's eligibility. Ismaidar et al[8] examine legal interpretation and reasoning concerning the equivalency of foreign educational qualifications for executive candidacy. Their analysis emphasizes interpretative consistency in determining whether foreign educational credentials satisfy Indonesia's statutory educational requirements. Prasna et al.[9], meanwhile, examine the constitutionality of educational requirements for presidential and vice-presidential candidates, directing attention to the constitutional justification and legal application of eligibility standards. These approaches address different dimensions of the same legal problem. The former concerns the interpretation and recognition of educational qualifications, whereas the latter concerns the constitutional position of educational requirements within the electoral framework. Building upon this distinction, the present study treats educational equivalency as an administrative determination that must be supported by lawful authority, documentary evidence, and applicable regulatory standards. The analytical issue is therefore not merely whether an educational qualification may be considered equivalent but whether the administrative decision granting that recognition satisfies the legal requirements governing

its issuance. This distinction provides a doctrinal basis for evaluating the certificate independently from the electoral eligibility determination for which it was subsequently used.

Judicial Authority and the Legal Consequences of Administrative Decisions

The legal consequences of judicial decisions must be determined according to the jurisdiction of the adjudicating institution, the object of the dispute, the court's legal reasoning, and the operative provisions of its judgment. Within Indonesia's judicial framework, administrative courts examine disputes concerning government administrative decisions within their statutory competence, whereas the Constitutional Court exercises constitutionally specified powers, including adjudication of disputes concerning general election results. Wora et al[10] examine jurisdictional boundaries involving administrative judicial authority and constitutional adjudication, emphasizing the importance of maintaining institutional competence. Firdaus et al[14] analyze the scope of the Constitutional Court's competence in resolving general election result disputes. Although both studies address the limits of judicial authority, they provide distinct analytical perspectives: the former concerns the boundaries of administrative judicial review, whereas the latter focuses on the constitutional jurisdiction governing electoral disputes.

A further doctrinal distinction concerns the relationship between judicial reasoning (ratio decidendi) and the operative judgment (amar putusan). Judicial reasoning provides the legal justification for a decision, while the operative judgment determines the judicial disposition of the dispute and serves as the principal reference for identifying the obligations and legal consequences established by the court. This distinction is essential when an administrative decision is connected to other legal processes outside the immediate object of litigation. Annulment of an educational equivalency certificate concerns the legal status of the disputed administrative instrument, whereas electoral eligibility determinations and the constitutional tenure of an elected official involve additional legal standards and institutional procedures. Articles 7A and 7B of the 1945 Constitution establish specific grounds and mechanisms for the removal of a President or Vice President from office. Accordingly, the relationship between administrative annulment and constitutional consequences requires an examination of the governing legal provisions rather than an assumption that the consequences of one judicial decision automatically extend to all related legal matters. These doctrinal distinctions provide the analytical foundation for examining Supreme Court Decision Number 742 K/TUN/2026. The decision must be assessed by identifying the disputed administrative object, the legal grounds underlying the judgment, the binding operative provisions, and the consequences arising within the administrative legal framework. Any additional implications for electoral eligibility or constitutional office must be evaluated separately according to the competent institution and applicable statutory or constitutional procedures. Such an approach enables the study to distinguish the legal consequences established by an administrative judicial decision from those requiring independent legal determinations.

Problem Statement

Based on the foregoing doctrinal framework, this study examines the relationship between the administrative validity of educational equivalency certificates and the legal consequences of judicial decisions concerning documents used to establish electoral eligibility. The analysis focuses on two principal research questions:

1. How should the legal validity of Certificate Number 9149/D.D1/KS/2019 concerning the educational equivalency of Vice President Gibran Rakabuming Raka be assessed based on the applicable regulations, administrative authority, procedural requirements, substantive validity, and the principle of legal certainty under Indonesian state administrative law?

2. What are the juridical implications of Supreme Court Decision Number 742 K/TUN/2026 for compliance with educational eligibility requirements in vice-presidential candidacy and the constitutional status of the Vice President within Indonesia's constitutional system?

3. Method

Research Design

This study employs normative legal research to examine the validity of Certificate Number 9149/D.D1/KS/2019 concerning the recognition of Gibran Rakabuming Raka's foreign educational qualifications as equivalent to Indonesian senior secondary education and the juridical implications of Supreme Court Decision Number 742 K/TUN/2026. Normative legal research focuses on identifying, interpreting, and evaluating legal norms, statutory provisions, judicial decisions, and relevant legal doctrines to formulate legally justified conclusions. According to Marzuki[15], legal research involves examining legal rules, principles, and doctrines to resolve specific legal issues through systematic legal reasoning. Accordingly, this study applies a prescriptive legal research design that evaluates administrative validity based on lawful authority, procedural compliance, substantive requirements, and the General Principles of Good Governance (Asas-Asas Umum Pemerintahan yang Baik, AUPB). The analysis also considers the relationship between state administrative law and constitutional law to distinguish the legal consequences of administrative judicial decisions from those affecting electoral eligibility and constitutional public office.

Research Approaches

This research applies three complementary approaches: the statute approach, case approach, and conceptual approach. The statute approach examines the hierarchy, substance, applicability, and temporal validity of legal provisions governing educational equivalency, government administration, electoral eligibility, and judicial authority. Particular attention is directed toward identifying the regulations applicable on August 6, 2019, when Certificate Number 9149/D.D1/KS/2019 was issued. Each relevant regulation is examined according to its enactment date, effective date, legal status, scope of authority, substantive requirements, and transitional provisions, where applicable. Subsequent regulations are considered only when legally relevant to interpreting or determining the continuing consequences of earlier administrative actions. Marzuki[15] emphasizes the importance of examining statutory consistency and legal applicability when resolving normative legal issues.

The case approach focuses on Supreme Court Decision Number 742 K/TUN/2026 and Constitutional Court Decision Number 01/PHPU.PRES-XXIV/2026. Both decisions are examined according to their respective legal objects, factual backgrounds, procedural histories, judicial considerations, ratio decidendi, and operative judgments (amar putusan). Supreme Court Decision Number 742 K/TUN/2026 is analyzed to determine the legal grounds and administrative consequences concerning the disputed educational equivalency certificate. Constitutional Court Decision Number 01/PHPU.PRES-XXIV/2026 is examined to identify the scope of constitutional adjudication and distinguish judicial considerations from binding operative provisions. Meanwhile, the conceptual approach examines doctrines of administrative legality, legal certainty, governmental authority, administrative accountability, and constitutional competence. Ridwan HR[16] provides a doctrinal foundation for understanding governmental authority and the principle of legality, while Hadjon et al[17] emphasize administrative legal protection and the exercise of governmental powers. These approaches collectively establish the normative framework for evaluating administrative validity and the limits of judicial consequences.

Sources of Legal Materials

The research utilizes primary, secondary, and tertiary legal materials selected according to their legal authority, substantive relevance, temporal applicability, authenticity, and relationship to the research questions. Primary legal materials include the 1945 Constitution of the Republic of Indonesia[18]; Law Number 30 of 2014 concerning Government Administration[5]; Law Number 7 of 2017 concerning General Elections and its relevant amendments[19]; Law Number 5 of 1986 concerning State Administrative Courts and its amendments[20]; Law Number 48 of 2009 concerning Judicial Power[21]; and Law Number 20 of 2003 concerning the National Education System[22]. The primary materials also encompass the implementing regulations governing foreign educational equivalency, Certificate Number 9149/D.D1/KS/2019, Supreme Court Decision Number 742 K/TUN/2026, and Constitutional Court Decision Number 01/PHPU.PRES-XXIV/2026. Regulations are selected based on their legal force and applicability to the relevant administrative action, particularly the regulatory provisions effective on August 6, 2019. Judicial decisions are selected according to their direct relevance to the disputed certificate, the legal questions examined, and the jurisdiction of the adjudicating institution.

Secondary legal materials consist of academic books, peer-reviewed journal articles, legal commentaries, and scholarly doctrines concerning administrative validity, foreign educational equivalency, constitutional eligibility, and judicial authority. These materials are selected based on their relevance to the research questions, scholarly credibility, identifiable authorship, publication information, and contribution to legal interpretation. Hadjon et al[17] provide a doctrinal perspective on administrative authority and legal protection, while Riza [12]examines the legal characteristics of state administrative decisions under Indonesian legislation. Tertiary legal materials comprise legal dictionaries, encyclopedias, legal indexes, and the Indonesian Dictionary (Kamus Besar Bahasa Indonesia, KBBI), which support the interpretation and clarification of legal terminology. Primary legal materials serve as the principal basis for determining applicable legal obligations, while secondary and tertiary materials support doctrinal analysis without replacing authoritative legal provisions.

Legal Material Collection Techniques

Legal materials are collected through systematic library research involving identification, inventory, selection, verification, and classification of relevant legal documents. Statutory regulations are traced through official government legal documentation systems, including the National Legal Documentation and Information Network (Jaringan Dokumentasi dan Informasi Hukum Nasional, JDIHN) and the relevant ministerial legal documentation repositories. Judicial decisions are obtained or verified through official judicial information systems, particularly the Supreme Court Decision Directory and the Constitutional Court's official publication facilities. Academic literature is identified through scholarly journals, academic repositories, and recognized legal publications. These sources are prioritized to ensure that the legal materials possess identifiable origins and can be independently examined.

The selection and verification process applies five criteria. First, substantive relevance is established by assessing whether each material directly concerns administrative authority, educational equivalency, electoral eligibility, or judicial competence. Second, temporal applicability is examined by identifying whether the relevant regulation was legally effective when the disputed administrative certificate was issued. Third, normative authority is assessed through the hierarchy of legal instruments and the competence of the issuing institution. Fourth, documentary authenticity is evaluated by comparing document numbers, issuance dates, institutional origins, and available official versions. Fifth, analytical relevance is determined by examining whether each material contributes directly to answering one or both research questions. For judicial decisions, verification includes identifying the case number, adjudicating institution, parties, disputed legal object, procedural history, judicial reasoning, and operative judgment.

Materials that cannot be authenticated or whose legal applicability cannot be established are not treated as conclusive evidence of the disputed administrative action. The selected materials are subsequently classified into statutory provisions, administrative documents, judicial decisions, and supporting legal doctrines to facilitate systematic normative analysis.

Legal Material Analysis Techniques

This study employs qualitative normative legal analysis using prescriptive and argumentative legal reasoning. The analysis integrates grammatical, systematic, and teleological interpretation to determine the meaning, consistency, and legal objectives of relevant statutory provisions. Grammatical interpretation examines the wording of legal provisions, systematic interpretation evaluates their relationship within the broader regulatory framework, and teleological interpretation considers the legal purposes underlying administrative and constitutional requirements. As explained by Marzuki[15], normative legal analysis requires coherent legal argumentation grounded in authoritative legal materials and established legal principles. These interpretative methods are applied to distinguish the substantive requirements governing educational equivalency from the administrative procedures through which official recognition is granted.

The analysis of the first research question begins by identifying the legal provisions applicable to Certificate Number 9149/D.D1/KS/2019 on August 6, 2019. The certificate is then assessed using three principal validity criteria derived from Article 52 of Law Number 30 of 2014: the authority of the issuing official, compliance with legally prescribed procedures, and substantive conformity with the requirements governing educational recognition. The examination of authority involves identifying the legal basis and scope of the official's decision-making power, including attribution, delegation, or mandate. Procedural analysis evaluates the legally required stages of application, documentary examination, verification, and issuance against the available administrative evidence. Substantive analysis examines whether the educational records and supporting documents satisfy the applicable equivalency requirements. These assessments are subsequently evaluated in relation to the General Principles of Good Governance, particularly legal certainty, impartiality, and careful administrative decision-making. Each criterion is classified according to whether compliance is established, noncompliance is established, or the available legal materials are insufficient to support a definitive determination.

The analysis of judicial decisions follows five sequential stages. First, the factual and procedural background of each decision is identified, including the parties, disputed legal object, claims, and procedural history. Second, the relevant legal considerations are examined to identify the statutory provisions, facts accepted by the court, and arguments supporting its determination. Third, the ratio decidendi is identified by distinguishing the legal reasoning necessary to support the judgment from supplementary observations or considerations not essential to the decision. Fourth, the operative judgment (amar putusan) is analyzed to establish the judicial disposition, legal status of the disputed administrative instrument, and obligations expressly imposed on the relevant parties or institutions. Fifth, the identified legal consequences are evaluated according to the jurisdiction of the deciding court and the statutory provisions governing their implementation. This procedure ensures that legal conclusions are derived from the actual judicial reasoning and operative provisions rather than from interpretations extending beyond the scope of the judgment.

To answer the second research question, the findings from Supreme Court Decision Number 742 K/TUN/2026 are examined in relation to the electoral eligibility requirements established under Law Number 7 of 2017 and the constitutional provisions governing the position of the Vice President. Particular attention is given to distinguishing the administrative consequences affecting the educational equivalency certificate from separate determinations concerning substantive educational qualifications, electoral

eligibility, election results, and constitutional tenure. Constitutional Court Decision Number 01/PHPU.PRES-XXIV/2026 is analyzed according to its actual legal reasoning and operative provisions without treating judicial observations as independent determinations beyond the Court's jurisdiction. The findings are further interpreted in relation to Articles 7A and 7B of the 1945 Constitution and the legal competence of the relevant electoral and judicial institutions. Finally, the results are synthesized through prescriptive legal reasoning to formulate conclusions that directly address both research questions while distinguishing established legal findings from matters requiring additional documentary or judicial verification.

4. Results and Discussion

Legal Validity of Certificate Number 9149/D.D1/KS/2019 under State Administrative Law and the Principle of Legal Certainty

a. Legal Status of the Educational Equivalency Certificate as a Government Administrative Instrument

The examination of Certificate Number 9149/D.D1/KS/2019, dated August 6, 2019, establishes that the disputed document constituted an administrative instrument issued by the Directorate General of Primary and Secondary Education to recognize Gibran Rakabuming Raka's foreign educational qualifications as equivalent to Indonesian secondary education. Its legal significance extended beyond educational administration because the certificate was subsequently associated with the documentary requirements for vice-presidential candidacy. Accordingly, the certificate must be distinguished from the underlying foreign educational records and from the separate determination of candidate eligibility conducted by the electoral authority.

Under Article 52 of Law Number 30 of 2014 concerning Government Administration, the validity of an administrative decision depends on the authority of the issuing official, compliance with applicable procedures, and substantive conformity with the object of the decision. Riza[12] explains that administrative decisions must be examined according to their legal characteristics and the statutory framework governing their issuance. Applying this doctrine to the disputed certificate requires an assessment of whether the administrative recognition was supported by the legally required educational evidence rather than merely whether an official document had been issued.

The decisive development occurred through Supreme Court Decision Number 742 K/TUN/2026, dated October 30, 2026. The Supreme Court granted the cassation appeal filed by H.M. Subhan, overturned the earlier administrative court judgments, adjudicated the dispute itself, and declared Certificate Number 9149/D.D1/KS/2019 annulled. The Court also ordered the relevant administrative authority to revoke the certificate[6]. These findings establish that the certificate's invalidity is no longer merely a hypothetical legal question but the subject of an operative judicial determination.

However, the annulment must be interpreted according to its specific legal object. The Supreme Court's ruling concerns the administrative certificate and the legality of its issuance. It does not, by that operative ruling alone, constitute a separate adjudication of election results or a constitutional decision concerning tenure in public office. This distinction forms the basis for examining the relationship between administrative legality and constitutional consequences.

b. Examination of Administrative Legality, Authority, Procedures, and Substantive Validity

The administrative legality of Certificate Number 9149/D.D1/KS/2019 is assessed through three interconnected criteria: the issuing authority, procedural compliance, and substantive validity. These criteria allow the applicable legal norms to be tested against the available case-specific evidence.

Regarding authority, the certificate was issued under the institutional identity of the Director General of Primary and Secondary Education. The relevant legal issue is whether that official possessed the necessary authority to determine equivalency at the secondary education level on August 6, 2019. Ridwan HR[16] distinguishes the legal foundations of governmental authority, while Jabar et al[13] discuss the significance of delegation and mandate in administrative decision-making. The identification of the issuing institution provides evidence of the administrative origin of the certificate, but it does not independently establish the precise legal instrument conferring authority or its scope. Consequently, a finding that the issuing official acted without authority would require identification of the applicable delegation, mandate, or attribution provisions. The available materials support identification of the issuing institution but do not independently establish an absence of institutional authority.

The procedural assessment produces a more specific finding. Reports reproducing the Supreme Court's legal considerations indicate that the administrative certificate was issued on the basis of documents including a certificate of attendance, academic records, and an explanation of grades. The Court considered these records insufficient to demonstrate successful completion of a particular educational level. The distinction is legally significant because documentary evidence of participation in educational activities does not necessarily establish graduation or completion of an educational qualification. The examination therefore concerns not merely the existence of supporting documents but their legal and evidentiary adequacy for the particular form of recognition granted.

This finding is directly relevant to the principle of careful administrative decision-making under Article 10 of Law Number 30 of 2014. Djou et al [7] emphasize the responsibility of public authorities to ensure compliance with the General Principles of Good Governance. In the present case, the deficiencies described in the judicial reasoning concern the relationship between the documents examined and the administrative conclusion reached by the issuing authority. An equivalency determination based on records that do not establish educational completion creates a discrepancy between the factual foundation of the decision and the educational status recognized through it.

The substantive assessment reinforces this finding. Article 169(r) of Law Number 7 of 2017 concerning General Elections establishes completion of senior secondary education or an equivalent qualification as an eligibility requirement. Ismaidar et al[8] emphasize the importance of legal interpretation in determining the equivalency of foreign educational qualifications for executive candidacy. However, the distinction between possessing educational knowledge comparable to a particular level and holding evidence of completion of that level remains legally material. The judicial assessment indicates that the administrative recognition was unsupported by sufficiently persuasive documentation demonstrating completion of the relevant foreign educational qualification.

Accordingly, the principal case-specific finding is that the disputed certificate was annulled following judicial examination of the adequacy of its substantive evidentiary foundation and the care exercised in administrative decision-making. The available reported reasoning supports a finding of evidentiary and administrative-care deficiencies. It does not justify an additional assertion that the issuing official lacked legal authority unless that defect is separately established from the applicable regulations and judicial findings.

c. Applicable Educational Equivalency Regulations and Temporal Legal Validity

The legality of Certificate Number 9149/D.D1/KS/2019 must be examined according to the regulatory framework applicable when it was issued on August 6, 2019. This temporal requirement is necessary to prevent subsequent regulations from being applied retrospectively without an express legal basis. Law

Number 20 of 2003 concerning the National Education System provides the general statutory framework for educational recognition, while Law Number 30 of 2014 concerning Government Administration establishes the requirements governing lawful administrative decisions.

The regulatory instruments identified in the literature require distinction according to their substantive scope. Minister of Education and Culture Regulation Number 29 of 2014 principally concerns the legalization and replacement of educational certificates and related documents at the primary and secondary levels. Minister of Education and Culture Regulation Number 14 of 2017 concerns educational certificates and national examination result certificates. Although these regulations formed part of the regulatory environment preceding the issuance of the disputed certificate, their relevance to a foreign educational equivalency determination must be established through the specific provisions governing the administrative action.

Minister of Education, Culture, Research, and Technology Regulation Number 58 of 2024, concerning certificates at primary and secondary education levels, came into force after the disputed certificate was issued. Therefore, it cannot be applied directly as the governing standard for an administrative action performed in August 2019. Its relevance is confined to subsequent regulatory developments or transitional provisions that expressly address earlier administrative instruments. The regulation's later recognition of foreign educational documents does not, by itself, establish that its provisions governed the issuance of the certificate in 2019.

The decisive distinction concerns the legal requirements for recognizing foreign educational completion. Official educational equivalency services distinguish documents demonstrating educational completion from documents providing information about attendance or academic performance. In applying the administrative legality test, an equivalency certificate must therefore be supported by evidence appropriate to the particular status being recognized. The judicial dispute illustrates the legal consequences of failing to distinguish evidence of educational participation from evidence of completion of a prescribed qualification.

The analysis consequently identifies two separate regulatory questions. The first concerns whether the issuing institution acted within the authority conferred by the legal instruments applicable in August 2019. The second concerns whether the documentary basis for recognition satisfied the substantive educational requirements applicable at that time. The judicial annulment provides a definitive outcome regarding the validity of the disputed administrative certificate. Nevertheless, identification of the exact implementing regulation and its operative provisions remains necessary to establish a complete explanation of the administrative requirements applicable to its original issuance.

d. Educational Equivalency Certificates from the Perspective of Legal Certainty

The judicial annulment of Certificate Number 9149/D.D1/KS/2019 demonstrates that legal certainty in administrative decision-making depends upon both documentary reliability and substantive conformity with applicable legal requirements. Riza (2018) emphasizes the importance of the legal characterization of administrative decisions, while Djou et al highlight accountability when governmental decisions fail to comply with good governance principles. In this case, these doctrines are directly relevant to the consequences of relying on an official administrative document whose supporting educational evidence was subsequently subjected to judicial scrutiny.

An important distinction emerges between the legal status of the certificate and the underlying educational history of its holder. Annulment of administrative recognition means that the annulled certificate cannot continue to be treated as an unaffected administrative determination. However, the legal consequences of that annulment must not be confused with a comprehensive judicial determination of every aspect of the

individual's educational history. A conclusion concerning the possession or absence of a particular qualification requires examination of the educational records and applicable evidentiary standards.

The finding therefore concerns the reliability of administrative recognition as a legal instrument. Administrative authorities must be able to demonstrate the factual and legal basis supporting the qualifications they recognize. Where a court determines that the administrative recognition rests on insufficient evidence, corrective measures serve to restore legality and administrative accountability. This relationship between evidentiary adequacy, judicial correction, and legal certainty provides the foundation for assessing the subsequent implications of the Supreme Court's decision.

Juridical Implications of Supreme Court Decision Number 742 K/TUN/2026 for Vice-Presidential Educational Eligibility and Constitutional Status

a. Educational Eligibility Requirements for Presidential and Vice-Presidential Candidates under Indonesian Law

The juridical implications of the annulled educational equivalency certificate must be assessed within the statutory requirements governing presidential and vice-presidential candidacy. Article 169(r) of Law Number 7 of 2017 concerning General Elections requires candidates to have completed at least senior secondary education or an equivalent qualification, while Article 227(l) concerns documentary evidence demonstrating compliance with educational requirements. Prasna et al[9] examine educational qualifications within the constitutional framework of presidential and vice-presidential candidacy, while Ismaidar et al[8] emphasize the interpretation of foreign educational equivalency in applying electoral legislation.

The findings establish a distinction between three legally connected matters: completion of the required educational qualification, administrative recognition of that qualification, and verification of the qualification during the electoral nomination process. These matters are related but are not interchangeable. A document recognizing educational equivalency may serve as evidence during candidate registration, but the issuing educational authority and the General Elections Commission (Komisi Pemilihan Umum, KPU) perform different legal functions.

The educational authority determines the administrative recognition of foreign qualifications within its regulatory competence. The KPU examines compliance with candidacy requirements according to electoral legislation and implementing regulations, including General Elections Commission Regulation Number 19 of 2023 concerning the nomination of presidential and vice-presidential candidates. Consequently, the legality of the underlying equivalency certificate and the legality of the electoral verification process must be assessed according to their respective legal standards.

The distinction becomes significant because Constitutional Court Decision Number 01/PHPU.PRES-XXIV/2026 discusses the evidentiary adequacy of documents associated with the educational qualification in question. In its legal considerations, the Constitutional Court distinguished documents recording educational attendance or academic performance from documents demonstrating completion of the relevant educational level. The Court also examined the administrative verification conducted by the KPU, including the circumstances under which clarification of candidate documentation may be appropriate.

These considerations indicate that formal acceptance of an administrative document and substantive verification of the underlying qualification are not necessarily identical processes. However, the legal significance of the Constitutional Court's observations must be distinguished from its final disposition of

the electoral dispute. The Court's assessment of educational evidence did not result in an operative judgment invalidating the candidate's election or determining the constitutional termination of public office.

b. Facts, Ratio Decidendi, and Operative Judgment of Supreme Court Decision Number 742 K/TUN/2026

Supreme Court Decision Number 742 K/TUN/2026 originated from an administrative dispute brought by H.M. Subhan against the governmental authority responsible for issuing Certificate Number 9149/D.D1/KS/2019. The disputed object was the educational equivalency certificate dated August 6, 2019, concerning Gibran Rakabuming Raka's foreign educational qualifications. The initial dispute was examined by the Jakarta State Administrative Court in Case Number 62/G/2026/PTUN.JKT, decided on May 21, 2026. The subsequent appeal was examined by the Jakarta State Administrative High Court in Case Number 130/B/2026/PT.TUN.JKT, decided on August 12, 2026. The case subsequently reached the Supreme Court at the cassation stage[6]

The Supreme Court's cassation decision, dated October 30, 2026, overturned the earlier judgments and adjudicated the administrative dispute directly. The reported judicial considerations identify several interconnected issues concerning administrative legality, the evidentiary basis of educational recognition, and the legal significance of findings made in the related Constitutional Court proceedings.

First, the Supreme Court addressed the corrective function of administrative judicial review in circumstances where alleged administrative irregularities became the subject of litigation beyond the ordinary electoral dispute process. This reasoning concerns the institutional capacity of administrative courts to examine governmental decisions as distinct legal objects, even where those decisions are connected to electoral processes. The legal issue was therefore the legality of the administrative certificate rather than a direct request to determine electoral results.

Second, the Supreme Court considered the documentary foundation of the disputed administrative certificate. The reported considerations indicate that documents such as a certificate of attendance, academic records, and an explanation of grades did not establish completion of the relevant educational qualification. The distinction between attendance and educational completion was essential because the legal effect of the certificate depended on whether its underlying evidence supported the recognized qualification.

Third, the Court's reasoning addressed the principle of administrative carefulness. Issuing an educational equivalency determination without adequate evidence of educational completion was considered inconsistent with the care required in governmental decision-making. The deficiency concerned the relationship between the supporting factual documentation and the legal conclusion expressed through the administrative certificate.

Fourth, the Supreme Court referred to the legal considerations arising from Constitutional Court Decision Number 01/PHPU.PRES-XXIV/2026. These considerations were relevant to the evidentiary questions surrounding the disputed educational certificate. Their significance must nevertheless be understood within the distinct jurisdictional functions of the two courts. The Constitutional Court's treatment of educational evidence did not transform its inadmissibility ruling into a substantive judgment annulling an administrative certificate.

The operative judgment of Supreme Court Decision Number 742 K/TUN/2026 establishes four material consequences. The Court granted the cassation appeal, overturned the earlier administrative court judgments, granted the plaintiff's claim, and declared Certificate Number 9149/D.D1/KS/2019 annulled. It

further ordered the defendant administrative authority to revoke the certificate and imposed the relevant litigation costs (Supreme Court of the Republic of Indonesia, 2026).

The relationship between the Court's reported reasoning and its operative judgment identifies the principal administrative-law finding of the case. The evidentiary deficiencies concerning educational completion and the resulting failure of careful administrative verification provide the reported substantive justification for correcting the disputed administrative decision. The operative judgment then establishes the specific judicial remedy: annulment of the certificate and an obligation imposed on the issuing administrative authority to revoke it.

The consequences must be interpreted according to the judicial object and the relief granted. The ruling directly affects the administrative certificate. It does not expressly contain a separate operative order cancelling the presidential election results or terminating the constitutional status of the Vice President. Therefore, further legal consequences cannot be attributed to the Supreme Court without identifying an additional statutory or constitutional mechanism authorizing them.

c. Relationship Between Supreme Court and Constitutional Court Decisions

Supreme Court Decision Number 742 K/TUN/2026 and Constitutional Court Decision Number 01/PHPU.PRES-XXIV/2026 concern legally related issues but were issued within different judicial proceedings. The Supreme Court examined the legality of an administrative certificate, whereas the Constitutional Court considered a petition concerning the results of the 2024 presidential and vice-presidential election. This distinction is consistent with the importance of institutional competence discussed by Wora et al. (2026) and Firdaus et al. (2024).

Constitutional Court Decision Number 01/PHPU.PRES-XXIV/2026, pronounced on October 6, 2026, contains substantive legal considerations concerning the documentation submitted to support the educational qualification in question. The Court considered whether the records available during the proceedings demonstrated completion of a foreign educational qualification equivalent to Indonesian senior secondary education. It also examined the relationship between documentary recognition and the verification responsibilities of the electoral authority (Constitutional Court of the Republic of Indonesia, 2026).

Nevertheless, the operative judgment must be distinguished from these considerations. The Constitutional Court upheld the objection concerning the petitioners' lack of legal standing and declared the petition inadmissible. Therefore, the decision cannot accurately be characterized as an operative judicial determination cancelling the election results, disqualifying the candidate, or terminating the constitutional office.

The Supreme Court's decision subsequently addressed a different legal object: the administrative certificate itself. Although the Supreme Court's reported legal reasoning referred to the Constitutional Court's findings concerning educational evidence, the legal consequences of the Supreme Court's ruling originated from its own exercise of administrative judicial authority and the remedies expressed in its operative judgment.

This comparison produces an important doctrinal finding. Judicial considerations concerning the sufficiency of educational evidence may be relevant across related legal proceedings, but their legal effect depends on the jurisdiction, disputed object, procedural circumstances, and operative judgment of each case. Accordingly, the Constitutional Court's observations cannot be treated as an independent operative annulment of the certificate, just as the Supreme Court's administrative annulment cannot be treated as an operative constitutional judgment concerning election results.

d. Constitutional Implications for the Legal Status of the Vice President

The consequences of an annulled educational equivalency certificate for constitutional public office require examination of the relationship between the electoral nomination process and the legal status of an official following election and inauguration. Article 6A of the 1945 Constitution governs the election of the President and Vice President, while Law Number 7 of 2017 regulates statutory candidacy requirements and electoral administration. These provisions establish the legal framework within which educational documentation is verified before candidates participate in an election.

At the nomination stage, documentary verification falls within the competence of the electoral institutions according to the applicable electoral legislation. The annulment of a document subsequently used in the verification process may raise questions concerning the reliability of the earlier eligibility determination. However, the existence of such questions does not itself establish a judicial determination that the election results have been annulled. That consequence requires a separate legal basis and a decision made by the institution competent to determine the relevant electoral dispute.

The distinction becomes more significant after the completion of electoral stages and the inauguration of the elected officials. Constitutional Court Decision Number 01/PHPU.PRES-XXIV/2026 identified procedural limitations concerning the petitioners' legal standing and ultimately declared the petition inadmissible. Although the Court examined questions surrounding educational evidence, its operative judgment did not provide a mechanism for removing an inaugurated Vice President from office.

The constitutional framework governing presidential and vice-presidential tenure is distinct from the framework governing the issuance and judicial review of administrative certificates. Article 7A of the 1945 Constitution establishes grounds for removal, including specified constitutional violations and circumstances involving the requirements for holding office. Article 7B prescribes a constitutional procedure involving the House of Representatives (Dewan Perwakilan Rakyat, DPR), the Constitutional Court (Mahkamah Konstitusi, MK), and the People's Consultative Assembly (Majelis Permusyawaratan Rakyat, MPR).

Accordingly, a legal assessment of possible constitutional consequences must consider the substantive grounds alleged, the evidence supporting those grounds, the competence of the relevant constitutional institutions, and the prescribed procedural stages. The annulment of an educational certificate may constitute legally relevant information for such an assessment, but it does not substitute for the constitutional determination required under the applicable legal framework.

This analysis supports a limited but significant conclusion. Supreme Court Decision Number 742 K/TUN/2026 establishes the invalidity of the disputed administrative certificate and the obligation to revoke it. Constitutional Court Decision Number 01/PHPU.PRES-XXIV/2026 establishes the inadmissibility of the petition before that Court, notwithstanding its discussion of educational evidence. Neither operative judgment, considered independently, constitutes an order removing the Vice President from office. Any additional constitutional consequences require independent examination of the applicable legal grounds, institutional powers, and procedures.

Synthesis of Findings and Theoretical Implications

The analysis identifies three principal findings concerning the relationship between administrative legality, educational eligibility, and constitutional governance. First, the judicial annulment of Certificate Number 9149/D.D1/KS/2019 demonstrates that an official educational equivalency document remains subject to review of its legal and evidentiary foundations. The reported deficiencies concerning the proof of educational completion establish the importance of careful administrative verification and substantive

consistency in the exercise of governmental authority. These findings are consistent with the administrative legality principles discussed by Riza[12] and the accountability framework examined by Djou et al[7].

Second, the relationship between educational equivalency and electoral eligibility involves distinct administrative functions. Recognition of a foreign educational qualification and verification of candidacy requirements are legally interconnected but are performed under different statutory competences. The annulment of the underlying equivalency certificate therefore affects the reliability of that administrative instrument without automatically resolving every separate legal question concerning electoral eligibility or election results. This distinction extends the discussion of educational recognition developed by Ismaidar et al and the constitutional dimensions of educational requirements examined by Prasna et al.

Third, the examination of the Supreme Court and Constitutional Court decisions demonstrates that legal consequences must be determined according to the disputed object, judicial reasoning, operative judgment, and jurisdiction of the deciding institution. The Supreme Court's decision provides a direct administrative remedy concerning the disputed certificate, while the Constitutional Court's decision resolves the petition according to the procedural requirements governing constitutional electoral adjudication. These findings reinforce the importance of institutional competence discussed by Wora et al and Firdaus et al.

The theoretical contribution of this study lies in distinguishing four levels of legal determination: the validity of an administrative educational certificate, the substantive evidence of educational completion, the verification of electoral eligibility, and the constitutional consequences concerning public office. Although these determinations may arise from the same factual controversy, they cannot be treated as legally identical. Each involves different legal standards, evidentiary requirements, competent institutions, and available remedies.

The practical implication is the need for educational authorities to maintain complete and verifiable documentary records supporting foreign educational equivalency determinations. Electoral institutions must also apply appropriate documentary verification standards when administrative certificates are submitted as evidence of candidacy requirements. Judicial decisions, in turn, must be implemented according to their actual operative provisions, while questions extending beyond the immediate administrative dispute must be addressed through legally authorized procedures.

Consequently, the findings demonstrate that legal certainty requires both effective correction of unlawful administrative decisions and adherence to the institutional boundaries governing their broader legal consequences. The annulment of Certificate Number 9149/D.D1/KS/2019 provides a concrete illustration of administrative judicial accountability, while the separate constitutional questions arising from its earlier use in electoral candidacy require analysis within the applicable electoral and constitutional frameworks.

5. Conclusion

The findings establish that Certificate Number 9149/D.D1/KS/2019, concerning the educational equivalency of Gibran Rakabuming Raka, was annulled through Supreme Court Decision Number 742 K/TUN/2026. The judicial outcome indicates that the certificate did not satisfy the legal requirements necessary to maintain its administrative validity. The principal deficiencies identified in the available analysis concern the adequacy of supporting educational documents and the careful verification of evidence demonstrating completion of the relevant educational qualification. These deficiencies are relevant to the substantive validity and administrative carefulness requirements established under Law Number 30 of 2014 concerning Government Administration. However, the available evidence does not independently establish that the issuing official lacked legal authority. Regarding the second research question, the

Supreme Court's decision directly affects the legal status of the disputed certificate and requires its revocation by the competent administrative authority. Nevertheless, the annulment does not, by itself, constitute a judicial determination invalidating election results or terminating the Vice President's constitutional office. Any further constitutional consequences require separate legal grounds and procedures under the applicable electoral legislation and Articles 7A and 7B of the 1945 Constitution.

Based on these findings, educational authorities should strengthen documentary verification by distinguishing evidence of school attendance from legally sufficient proof of educational completion before issuing foreign educational equivalency certificates. The issuing institution must also ensure that every determination is supported by identifiable regulatory authority, documented verification procedures, and adequate substantive evidence. Furthermore, the General Elections Commission should establish clearer procedures for verifying educational equivalency documents submitted by presidential and vice-presidential candidates, particularly when their validity is subsequently challenged or annulled. These recommendations directly address the evidentiary deficiencies and institutional coordination issues identified in the analysis. Strengthening these mechanisms is necessary to improve administrative legality, ensure reliable electoral eligibility verification, and maintain legal certainty without extending judicial consequences beyond the jurisdiction and operative provisions of the relevant decisions.

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