

TABLE OF CONTENTS

COVER PAGE.....	i
APPROVAL PAGE	ii
ACKNOWLEDGMENT PAGE	iii
STATEMENT OF AUTHENTICITY	iv
PREFACE	v
DEDICATION PAGE.....	vii
TABLE OF CONTENTS	ix
ABSTRACT.....	xii
<i>INTISARI</i>	xiii
CHAPTER I INTRODUCTION	1
A. Background	1
B. Research Problems	11
C. Research Goal	12
D. Originality of Research	13
E. Benefits of the Study	14
CHAPTER II THEORETICAL REVIEW	16
A. Overview of Financial Technology (Fintech)	16
A.1 History of Fintech	16
A.2 Definition of Fintech	18
A.3 Types of Fintech.....	20
A.4 Benefit of Fintech.....	22
B. Overview of Peer-to-Peer Lending (P2P Lending)	25
B.1 History of P2P Lending.....	25
B.2 Definition of P2P Lending	28
B.3 Stakeholders in P2P Lending	29
B.4 Scheme of P2P Lending in Indonesia	32
C. Overview of Anti-Money Laundering and Counter-Terrorism Financing Program	33
C.1 FATF and “40+9 Recommendations”	33
C.2 Implementation of “40+9 Recommendations” in Indonesia	35

C.3	Anti-Money Laundering and Counter-Terrorism Financing Program Based On OJK Regulation Number 12/POJK.01/2017	40
D.	Overview of Money Laundering	42
D.1	Definition of Money Laundering	42
D.2	Crime of Money Laundering in Indonesia	44
D.3	Money Laundering Typology	45
E.	Overview of Financing of terrorism.....	50
E.1	Crime of Terrorism	50
E.2	Financing of Terrorism	52
E.3	Financing of Terrorism in Indonesia.....	53
CHAPTER III	RESEARCH METHOD	55
A.	Research Method.....	55
A.1	Type of Legal Research	55
A.2	Types of Research	55
A.3	Data Analysis.....	59
CHAPTER IV	RESEARCH RESULT AND ANALYSIS	61
A.	Implementation of Anti-Money Laundering And Counter-Terrorism Financing Program by Modalku Post-Enactment of OJK Regulation Number 12/POJK.01/2017	61
A.1	Regulation of Fintech P2P Lending in Indonesia	65
A.2	Implementation of AML/CTF Program by Modalku	79
B.	How does the Authority of the Financial Services Authority to prevent Money Laundering and Terrorism Financing in Peer-to-Peer Lending Transaction post-enactment of OJK Regulation Number 12/POJK.01/2017	111
B.1	OJK Role to Ensure P2P Lending Startups that have been licensed meet the requirements contained in OJK Regulation Number 12/POJK.01/2017	115
B.2	OJK Policy to Ensure the Implementation of AML/CTF Program on P2P lending After the 4 Years Grace Period.....	117
C.	The Obstacles That Have Been Faced by OJK and Modalku in dealing with the implementation of OJK Regulation Number 12/POJK.01/2017.....	119
CHAPTER V	CLOSURE	125
A.	CONCLUSION	125

B. RECOMMENDATIONS	127
BIBLIOGRAPHY	129
APPENDICES	134
Appendix 1: Cycle of Risk Based Approach	134
Appendix 2: Table of Risks Separation Associated with the Activities of The Financial Services Providers	135
Appendix 3: <i>Nota Dinas</i> from Financial Service Authority	138