

## Smart Policing Strategy in Efforts to Eradicate Illegal Online Loan Cases (Pinjol) through the Establishment of an Investment Alert Task Force (SWI)

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### Abstract

*The rise of online loans (pinjol) from fintech peer to peer (P2P) occurs due to inevitable technological development. The number of complaints submitted to the Jakarta Legal Aid Institute (LBH) has more than doubled in 6 months. Based on data from LBH Jakarta, there were 4,500 complaints regarding fintech lending as of June 2019. This figure increased from the number of complaints as of early December 2018 which was 1,330 complaints. Due to the fact that many complaints of illegal loans victims, the establishment of cooperation with several relevant agencies including the Indonesian National Police (Polri) formed an Investment Alert Task Force (SWI) to tackle and prevent illegal online loans. This study uses a qualitative case study approach to analyze the negative effects of this phenomenon and answer question related to the strategy of the Indonesian National Police (Polri) through the implementation of Smart policing as an effort to overcome and prevent online loan-based crimes.*

### Keywords

illegal online loans; financial technology; smart policing; swi; polri



## I. Introduction

Technology is currently developing rapidly in various industries. Furthermore, the government is preparing to usher in the Industrial Revolution 5.0 which is assisted by the presence of Artificial Intelligence (AI). The financial or banking industry is one area that has experienced substantial changes due to the current advances in digital technology. Various financial tasks can now be carried out more easily and practically, saving time and effort due to technological advances. The emergence of Financial Technology or fintech which is a combination of technology and financial or financial systems which is an advancement in the field of financial services which is currently a trend in Indonesia is one of these shifts (Sinaga, Irawat, & Kurniawan, 2019).

Fintech emerged as an answer to the shift in people's lifestyles which are now dominated by users of information technology and the demands of a fast-paced lifestyle. Fintech has an impact on the wider community by providing access to financial products that make transactions more convenient and effective, such as transacting via smartphones, paying with e-Money, even making investments, as well as buying and selling transaction problems and payments, such as not having enough time to search stuff elsewhere. Shopping centers, trips to the bank/ATM to transfer funds, and the reluctance to visit a location because of poor service can all be reduced, and everything can now be done quickly. So, what used to require face-to-face meetings or face-to-face transactions can now be completed remotely in seconds. In other words, fintech enables more efficient and cost-effective buying and selling transactions and payment systems (Sinaga, Irawat, & Kurniawan, 2019).

Peer to peer lending or online loans is one of the financial technology or fintech products in Indonesia. The term Technology-Based Borrowing and Borrowing Services is

used to define online loans in POJK No. 77 /POJK.01/2016, namely regarding Information Technology-Based Lending and Borrowing Services. Technology-Based Borrowing and Borrowing Services, according to POJK, are financial services that bring together lenders and loan recipients to enter into lending and borrowing agreements in rupiah currency directly through an electronic system using the internet network (Kharisma, 2020).

Online loans are currently one of the financial options for people who need cash in a hurry, and they can quickly get a loan by downloading an application to their cell phone. In most cases, collateral is not required in an online loan application. Users can apply for loans with values starting from Rp. 500,000 to Rp. 3,000,000 just by preparing a personal data sheet and filling out an online form. The verification process is also fairly fast; On average, the verification process takes less than 48 hours to complete, and loans are disbursed immediately.

The market response is increasing due to the convenience provided by online loans, and now welcomes the presence of the online loan organization. As a result, more and more peer-to-peer lending organizations have emerged, both licensed (legal) and unlicensed (illegal), and according to OJK statistics, there are currently 164 registered and licensed companies in Indonesia as of December 20, 2019 (OJK, 2019).

The rapid expansion of this online loan company is accompanied by reports of internet lending organizations violating the law. As of June 2019, LBH Jakarta has received around 4,500 complaints about internet loans. Even in 2019, there were cases of suicide committed by illegal fintech victims due to depression becoming victims of fraud. The cases that occur are usually due to a lack of public understanding of fees, interest, loan periods, fines and the risk of borrowing from online loan companies, especially if people make loans to illegal companies. The higher the company's leverage, the company tends to generate less cash, this is likely to affect the occurrence of earning management. Companies with high debt or leverage ratios tend to hold their profits and prioritize the fulfillment of debt obligations first. According to Brigham and Ehrhardt (2013), the greater the leverage of the company, it tends to pay lower dividends in order to reduce dependence on external funding. So that the greater the proportion of debt used for the capital structure of a company, the greater the number of liabilities that are likely to affect shareholder wealth because it affects the size of the dividends to be distributed. (Yanizzar, et al. 2020)

These illegal companies usually take advantage of people's ignorance such as providing very easy loans, large and even unlimited interest, unlimited fines, access to all data on mobile phones, then customers who cannot pay on time will be terrorized, humiliated, defamation and threats when billing. This illegal company does not follow the rules set by the OJK such as the maximum interest rate of 0.8% per day and the maximum accumulated fine of 100% of the principal value. So that people who are in debt and unable to pay on time will find the debt burden more and more doubled due to unlimited interest and fines. The latest case in 2021 is the case of KSP Cinta Damai where the perpetrators slandered and even threatened their customers so that their customers could provide personal data and some money to the illegal fintech company.

Due to the large number of complaints related to fintech violations, the Investment Alert Task Force (SWI) was formed through the collaboration of several relevant agencies from regulatory and law enforcement agencies such as the OJK and the Indonesian National Police. This is where the role of the Police that is commensurate with technological progress is needed in handling illegal online loan cases that harm the Indonesian people. In this case, the role of the National Police has been good because it succeeded in arresting the perpetrators of illegal lending and the articles that will be imposed on the perpetrators of illegal lending fraud have also been regulated in Indonesian

legislation. In this study, the author uses a case study approach to illegal lending, for example in the case of the Cinta Damai Savings and Loans Cooperative, to understand more deeply about illegal fintech and what penalties will ensnare the perpetrators as well as the role of the Police in eradicating and efforts to prevent similar cases from happening again.

## II. Review of Literature

### 2.1. Smart Policing Concept

Police are required to be smart in policing (smart policing) to maintain and realize social order in the face of many potential conflicts, social problems facing society in the era of the Industrial Revolution 4.0 towards 5.0. Smart policing is not just the use of IT, but the police have become super (supercops) of competence, even their authority which is able to serve the community even in extreme conditions. Therefore, the police are required to improve competence in providing excellent services to the public that are fast, precise, accurate, transparent, accountable, informative and easily accessible. humanity (Hanjar, 2021).

Smart words are indeed a choice or hope for change. The mandate of the nation's constitution is to educate the nation's life. Smart leaders always think about what is new, what makes the community proud, which has an effect on high public trust. This is the impact of professional work supported by police modernization and trust is the fruit of excellent service. In some countries Smart policing has been used, for example in America. Smart policing is intelligent policing using data and analytics including improved analysis, performance measurement, and evaluation research. Meanwhile, the State of India, Prime Minister Shri Narendra Modi stated that Smart policing is a police performance that is professional, efficient, technologically capable, and socially sensitive, upholds supremacy and human rights in all situations and also engages optimally with the community.

Meanwhile, the goals of smart policing themselves include (Hanjar, 2021):

1. The spirit of the police service is proactive, problem solving, prioritizing prevention, empowerment and integrating various stakeholders, and improving the quality of life of the community. In addition, the presence of the police can become an icon or symbol of an intelligent police officer.
2. Building smart policing (smart policing) in the digital era requires intelligent political will. Smart policies are visionary policies and are able to anticipate and be developed into solutions. This policy is an inspirational milestone which is a fundamental and generally accepted principle. One principle a thousand styles. His subordinates can carry out developments in accordance with existing local values. Or according to the pattern of society and culture.
3. Smart policing aims as one of the police solutions in dealing with various contingency problems, as well as a smart, moral, modern and professional policing solution in order to maintain and realize social order in the face of many potential conflicts, social problems.

The factors that influence the realization of Smart policing include:

1. The role of the community as stakeholders to support the realization of smart police.
2. Structure includes human resources, professional bureaucratic governance system and funding.
3. Infrastructure, of course a very vital thing is a stable internet connection.

4. Superstructure, in this case is regulatory support which is the basis for implementing the smart police program.

## **2.2. Financial Technology Concept**

Roy S. Freedman states the definition of financial technology in his book *Introduction to Financial Technology* which translates: "Financial technology is concerned with building systems that model, value, and process financial products such as bonds, stocks, contracts, and money. At a minimum, financial products are represented by dimensions price, time, and credit. Like commercial systems, financial systems combine trading systems and trading technologies to enable buying and selling of products at different times and in different market spaces" (Kharisma, 2020).

This fintech user has also increased, increasing from 7% in 2006-2007 to 78 percent in 2017. Until 2017, there were 135-140 companies as users. According to statistics, the total number of fintech transactions in Indonesia last year was estimated at US\$15.02 billion (Rp202.77 trillion). This figure increased 24.6 percent from the previous year. In Indonesia, the number of fintech users has increased to around 260,000 as of January 2018. (Sikapuangmu, 2019). Fintech loans reached IDR 25.92 trillion as of January 2019, according to data from the Financial Services Authority (OJK). The total amount of payments increased by 14.36% from the beginning of 2018 of Rp. 22.67 trillion. In 2017, the Fintech market is expected to generate a total transaction value of US\$ 18.65 billion (Rp 251.775 trillion) (Sinaga, Irawat, & Kurniawan, 2019).

OJK issued OJK regulation no. 77/POJK.01/2016 which discusses information technology-based lending and borrowing services, which are often called peer to peer lending, as an answer to the rapid growth of fintech startups in Indonesia (P2P). Fintech organizations, ranging from market aggregators to peer to peer lending, offer online loans. This article regulates the requirements for fintech operators to apply for and obtain permits from the Financial Services Authority. The following are the differences in the characteristics of legal and illegal fintech according to Ariyanti, among others (Ariyanti, 2019):

## **2.3. General Study on Liability of Illegal Loans**

The issue of online loans or better known as financial technology peer to peer lending (P2P fintech) is increasingly popular. Finally, because of the debt collection, this fintech issue claimed the lives of consumers who chose to commit suicide because of depression. Unfortunately, there is still no legal answer to this dilemma, so similar cases keep popping up. Fintech companies have committed various violations. These issues are alleged to have occurred, ranging from intimidating billing to the release of personal data to sexual harassment. The alleged violations, among others, stemmed from public complaints received by the Jakarta Legal Aid Institute (LBH) over the past year (Rizki, 2019).

According to Jeanny Silvia Sirait as a public lawyer for LBH Jakarta, every form of illegal fintech violation is the responsibility of the Financial Services Authority related to Articles 4.5 and 6 of the OJK Law. So if you say what legal aspect is ensnaring the loan, it is clear that the OJK itself has rules there, whether he is registered or not. There are other rules for fintech companies that are proven to have violated the law. For example, he explained that fintech companies that commit violations in the form of sharing personal data may be subject to Article 32 juncto (jo) Article 48 of Law no. 11 of 2008 Juncto Law no. 19 of 2016 concerning Information and Electronic Transactions (ITE) (Pardosi & Primawardani, 2020). Then, the threat of fintech companies to customers can be charged

with Article 368 of the Criminal Code (KUHP) and Article 29 in conjunction with Article 45B of the ITE Law. Various forms of fintech violations can be criminally charged, including:

- a. Dissemination of personal data (Article 32 in conjunction with Article 48 of the ITE Law)
- b. Threats in billing (Article 368 of the Criminal Code and Article 29 in conjunction with 45 of the ITE Law)
- c. Fraud (Article 378 of the Criminal Code)
- d. Slander (311 Paragraph 1 of the Criminal Code)
- e. Sexual harassment through electronic media (Article 27 Paragraph 1 jo 45 Paragraph 1 UU ITE)

### **III. Research Method**

In conducting this research, the author uses a qualitative case study method. Qualitative research is a descriptive research method and tends to seek meaning from the data obtained from the results of a study. This method is usually used when someone will research related to social and cultural problems. Sugiyono said that qualitative research methods are often called naturalistic research methods because the research is carried out in natural conditions (Sugiyono, 2014).

#### **3.1 Research Approach**

One of the types of approach proposed by Creswell is a case study. This type of case study approach is a type of approach used to investigate and understand an event or problem that has occurred by collecting various kinds of information which is then processed to obtain a solution so that the problems revealed can be resolved. Susilo Rahardjo & Gudnanto in 2010 also explained that the case study is a method for understanding individuals that is carried out in an integrative and comprehensive manner in order to obtain a deep understanding of the individual and the problems he faces with the aim of solving the problem and obtaining good self-development (Rahardjo, 2010). 2011).

As for what distinguishes research with a case study approach with other types of qualitative research approaches, it is found in the depth of analysis in a particular case that is more specific. Data analysis and triangulation are also used to test the validity of the data and find the real objective truth. This method is very appropriate to analyze certain events in a certain place and at a certain time. In this study, we will discuss the case of the Cinta Damai Savings and Loan Cooperative (KSP). Where they make messages, writings that may be defamatory in nature. An example is something like this as if the borrower is a methamphetamine dealer, a drug dealer and threatens to slander and report it to the authorities.

#### **3.2 Data Source**

Because this research is mainly conducted on secondary data in libraries, the data used are secondary data, such as library research or document studies (Marzuki, 1983). This type of library study is often known as empirical research inversion (Field Research). The types and sources of data needed in this study are secondary data sources which are interpreted as legal materials that are not binding but explain primary legal materials which are the result of processed opinions or thoughts of experts or experts who study a particular field specifically that will provide guidance. where the researcher will lead. What is meant by secondary material here by the author is the doctrines contained in legal books and journals (Amiruddin, 2006).



In this case, the authors use journals and mass media that are relevant to the case of illegal borrowing activities to analyze the types of accountabilities of the perpetrators and to find out the role and efforts of the Police in tackling and preventing similar crimes.

### **3.3 Data Collection Techniques**

In the context of collecting primary legal materials, secondary legal materials and tertiary legal materials, the author uses the following data collection methods:

- a. Research library (library research) The collection of library data is obtained from as data related to the things studied, in the form of books and literature related to research. Besides that, the data taken by the author comes from important documents as well as from applicable laws and regulations (Soekanto, 2004).
- b. Field research method  
Field data needed as supporting data is obtained through information and opinions from respondents determined by purposive sampling (determined by the researcher based on his will) and / or random sampling (determined by the researcher at random).

## **IV. Result and Discussion**

### **4.1 Details of KSP Cinta Damai Illegal Online Loan Fraud Cases**

Brigadier General Helmy Santika, Director of Special Economic Crimes at the National Police Criminal Investigation Agency, said the perpetrators used SMS to distribute money-borrowing services. According to him, the perpetrators took advantage of the financial needs of the community during the COVID-19 outbreak. However, once the victim seeks a loan, the perpetrator sends it to the victim in a way that is not in accordance with the agreement. After that, the loan interest does not match the original arrangement. If the victim spends Rp. 1 million loans, the perpetrator will send Rp. 600,000 (Fajri, 2021).

If the victim is unable to repay the loan, his/her personal information will be published on social media. Where do they leave messages and perhaps defamatory posts. For example, the perpetrator will slander the borrower to make it look like the borrower is a shabu-shabu dealer, or a drug dealer. If she is a woman, then it is possible that her photo will be pasted or edited with inappropriate images, and so on. For this reason, the police have carried out further investigations. The police investigated and found a network in Medan, North Sumatra, based on previous disclosures of pinjol in the North Jakarta area and the victim's account (Sutiawan & Ramdhani, 2021).

From there, it was discovered that the perpetrators were related to several KSPs other than PT SCA. Saving and loan cooperative. According to Helmy, the network goes by various names, including green savings and loan cooperatives, peace-loving, happy islands, emergency funds, quick disbursements, super surprise loans, and others. If the victim does not pay immediately, the debt collector who provided the photo threatens to send it to all of the victim's phone contacts. In addition, debt collectors who contact victims via WhatsApp use aggressive language.

The Director of Special Economic Crimes at the National Police Criminal Investigation Agency, Brigadier General Helmy Santika, today released the arrest of 8 suspects for illegal online loans from the Cinta Damai Savings and Loans Cooperative (KSP) application. Helmy explained that eight suspects were arrested in different locations. Two people were arrested in Medan, North Sumatra (Maharani, 2021).

Deyana Rossa aka Dea, a debt collector, and Yuri Baramudia aka Yuri, a table gathering leader, are among the criminals. Then, in Tangerang City, Banten, one person, Christopher, was arrested. He is the party in charge of supervising, ordering, and

distributing the names of customers from all KSPs to Dea and Yuri. Meanwhile, five more people were detained in West Jakarta: Elroy, Benedictus, Alfonsius, Sidharta, and Rizky. They perform the functions of a sim card operator. Thousands of sim cards, as well as several cell phones and laptops, were confiscated during this arrest. There is also the facility of sending SMS in bulk. There are several smartphones and laptops whose purpose is to monitor the flow of transactions and communication of the perpetrators. Meanwhile, two more people are still being chased as of this writing. They are citizens of other countries (foreigners). The two men were on the wanted list (DPO) and banned, according to Helmy. He also stated that the police would be involved. He also stated that the police would continue to investigate incidents of unauthorized borrowing. This is due to public dissatisfaction with lending and borrowing activities that violate the law (Maharani, 2021).

#### **4.2 Smart policing Mechanism in Combating Illegal Loans through the Establishment of SWI**

The number of public complaints related to online loan activities by agencies that do not have clarity and even threatens the existence of their customers, an Investment Alert Task Force was formed or known as SWI. The Task Force for Handling Alleged Unlawful Actions in the Field of Public Funds and Investment Management was established based on the Decree of the Board of Commissioners of the Financial Services Authority Number: 01/KDK.01/2016 dated January 01, 2016. This Investment Alert Unit is the result of the collaboration of several related agencies, which includes (Pardede, 2018):

• **Regulators:**

- a. Financial Services Authority
- b. Ministry of Trade
- c. Capital Investment Coordinating Board
- d. ministry of cooperatives and SMEs
- e. Ministry of Communication and Information

• **Law enforcer:**

- a. Prosecutor of the Republic of Indonesia
- b. Indonesian National Police

The Investment Alert Task Force is a communication forum between ministries and institutions in the context of preventing and handling alleged unlawful acts in the field of raising public funds and managing investment, in accordance with the Memorandum of Understanding. The act against the law in question is in the form of collecting public funds and managing investments, which have the potential to harm the community, so it requires cooperation between regulators, supervisory agencies, law enforcement, and other related parties. These ministries and institutions signed a Memorandum of Understanding for the Coordination of Prevention and Handling of Alleged Unlawful Acts in the Field of Community Fund Raising and Investment Management in Jakarta. The task of the Investment Alert Task Force, according to Article 5 of the Memorandum of Understanding, is to prevent and investigate alleged criminal acts in the field of raising public funds and managing investment. From these results it can be seen that the revival of the application of the Investment Alert Task Force is divided into three parts (Pardede, 2018):

1. Preventive: Coordination between the Investment Alert Task Force in order to improve education and understanding of the scope of financial transactions that have the potential to harm the public; Socialization to community components, law enforcement, local government and academics; Identify and evaluate and take necessary actions on

investment offers through various marketing means not limited to internet delivery; and Streamlining the means of complaints from the Investment Alert Task Force.

2. Curative: Cooperation in the issuance of crowd permits / implementation of investment offering activities; and provide guidance in the form of warnings to companies that make investment offers that have the potential to harm the public in order to obtain permits and operate in accordance with applicable regulations.
3. Repressive: Taking legal action against violations of provisions and laws and

The chairman of the Investment Alert Task Force (SWI), Tongam L Tobing, supports the steps of the Police in taking legal action against illegal online borrowers (pinjol). He said these efforts must continue because it is very detrimental to the community. According to him, law enforcement actions by the Criminal Investigation Unit of the Police against the perpetrators of the illegal KSP Cinta Damai loan and the Rp Fast application must continue to be carried out to eradicate illegal online loans that are very detrimental to the community. Law enforcement against the perpetrators of illegal lending is very necessary to eradicate and provide a deterrent effect for the perpetrators.

Online lending sites and agencies are closed and banned by the Investment Alert Task Force (SWI). On these sites, SWI also publishes a list of fraudulent and unlawful borrowing sites, as well as a description of each type. The closure and blocking, according to OJK SWI Chairman Tongam L Tobing, was driven by a number of lending businesses that did not have official permits from various agencies and could disturb the public, causing fraud and intimidation of billing. SWI uncovered and closed several illegal online loan sites circulating digitally via SMS, mobile applications, and the internet in July. These sites have the potential to harm the public because of non-transparent interest and loan deadlines, as well as threats and intimidation in collection. SWI has tightened the scope of unlawful online lending by refusing to authorize it in an effort to combat it.

Because restricting sites and applications has little deterrent effect against these criminals, SWI encourages law enforcement to pursue these law-breaking online loan violators. These illegal loans are a broad issue that we must all work together to protect society. SWI also blocked 11 activities of companies suspected of operating without permission from the relevant authorities, as well as duplicating or on behalf of permitted entities, which could harm the public.

In order to support the National Police, SWI which consists of 12 ministries and institutions also continues to carry out various prevention efforts (Putri, 2021). One of them is through cyber patrols to close illegal loans that operate via short messages, the AppStore or Play Store and social media. SWI will also continue to intensify education to the public not to use illegal loans and utilize fintech lending registered with the OJK. In addition, SWI also reminds the public to recognize several characteristics of illegal online loans. Information on the legality of online loans can be checked via [bit.ly/ListfintechlendingOJK](http://bit.ly/ListfintechlendingOJK) or contact OJK Contact 157. People caught in illegal lending can also report to Polda and Polres throughout Indonesia, or through the website <http://patrolisiber.id> and email [info@cyber.polri.go.id](mailto:info@cyber.polri.go.id).

## V. Conclusion

Based on the description above, it can be concluded that criminal acts through online loan motives cannot be underestimated, and even took a toll due to the victim feeling depressed and committing suicide. This reflects how much damage is caused by this online loan-patterned crime. One example of this case, which was only revealed last July, was carried out by the Cinta Damai Corruption Savings and Loans (KSP) from the RpCepat



application and in the end eight of the perpetrators were arrested by the police. Furthermore, in order to eradicate this crime, the police of the Republic of Indonesia have a major role and contribution in it, apart from arresting the perpetrators, but also seeking preventive or preventive measures. So that an effective effort is needed against online crime based on technological advances, in this case a smart policing strategy is needed.

One of the efforts made against the background of the large number of reports from online loan victims, the Investment Alert Task Force (SWI) was formed which is a collaborative program of several related agencies including the Indonesian National Police. As an effort to prevent online loan-based crimes, SWI seeks to find and pursue business entities on behalf of online loans (fintech) that are not registered with the OJK agency and then close and prohibit these businesses. However, the implementation of smart policing will not be effective without the contribution and concern of the Indonesian people.

As mentioned earlier, the role of the community as stakeholders is also important to support the smart policing. Superior police resources and sophisticated infrastructure will be in vain if the community is apathetic to issues that occur in the community. For this reason, SWI has provided links or official government websites that can be accessed by the general public and to educate the public more deeply regarding financial technology/fintech-based crimes or in this case online loans.

## References

- Amiruddin. (2006). Pengantar Metode Penelitian Hukum. Jakarta: PT Raja Grafindo Persada.
- Ariyanti, F. (2019). Sama-sama Beri Pinjaman Online, Ini. Retrieved 2021, from Fintech: <https://www.cermati.com/artikel/sama-sama-beri-pinjaman-online-ini-bedanya-fintech-lending-ilegal-dan-legal>
- Fajri, R. (2021). Polisi Bongkar Jaringan Pinjol Ilegal, 2 WNA Buron. Retrieved 2021, from <https://mediaindonesia.com/megapolitan/421969/polisi-bongkar-jaringan-pinjol-ilegal-2-wna-buron>
- Hanjar, T. R. (2021). SMART POLICING. SEKOLAH INSPEKTUR POLISI , 6-43.
- Kharisma, D. B. (2020). PROBLEMATIKA MEKANISME PENYELESAIAN PINJAMAN GAGAL BAYAR PADA PINJAMAN ONLINE DI INDONESIA. RechtsVinding Online, 1-7.
- Maharani, T. (2021). Ketua Satgas Waspada Investasi: Pinjol Ilegal adalah Kejahatan. Retrieved 2021, from <https://nasional.kompas.com/read/2021/07/29/15585481/ketua-satgas-waspada-investasi-pinjol-ilegal-adalah-kejahatan?page=all#page2>
- Marzuki. (1983). Metodologi Riset. Yogyakarta: PT. Hanindita Offset.
- OJK. (2019). Penyelenggara Fintech Terdaftar dan Berizin di OJK per 30 Oktober 2019. Retrieved 2021, from <https://ojk.go.id/id/berita-dankegiatan/publikasi/Pages/Penyelenggara-FintechTerdaftar-dan-Berizin-di-OJK-per-30-Oktober2019.aspx>
- Pardede, F. B. (2018). IMPLEMENTASI PENGAWASAN SATGAS WASPADA INVESTASI TERHADAP PERUSAHAAN PENYEDIA PERJALANAN TRAVEL LUAR NEGERI STUDI KASUS FIRST TRAVEL di INDONESIA. DEPARTEMEN HUKUM EKONOMI, 1-27.
- Pardosi, R. O., & Primawardani, Y. (2020). PERLINDUNGAN HAK PENGGUNA LAYANAN PINJAMAN ONLINE DALAM PERSPEKTIF HAK ASASI MANUSIA. JURNAL HAM Volume 11, Nomor 3, Desember 2020, 1-16.
- Putri, I. (2021). Satgas Waspada Investasi Dukung Polri Tindak Tegas Pinjol Ilegal.

- Retrieved 2021, from detikFinance: [https://finance.detik.com/fintech/d-5664663/satgas-waspada-investasi-dukung-polri-tindak-tegas-pinjol-ilegal?\\_ga=2.73892759.460206124.1627781628-242004215.1627781628](https://finance.detik.com/fintech/d-5664663/satgas-waspada-investasi-dukung-polri-tindak-tegas-pinjol-ilegal?_ga=2.73892759.460206124.1627781628-242004215.1627781628)
- Rahardjo, S. &. (2011). Pemahaman Individu Teknik Non Tes. Kudus : Nora Media Enterprise.
- Rizki, M. J. (2019). Pasal-pasal Pidana yang Bisa Jerat Perusahaan Fintech Ilegal. Retrieved 2021, from Hukum online: <https://www.hukumonline.com/berita/baca/lt5c6cacf0c858c/pasal-pasal-pidana-yang-bisa-jerat-perusahaan-fintech-ilegal/?page=2>
- Sinaga, H. D., Irawat, N., & Kurniawan, E. (2019). FINANCIAL TECHNOLOGY: PINJAMAN ONLINE, YA ATAU TIDAK. Jurnal TUNAS: Jurnal Ilmiah Pengabdian kepada Masyarakat, Vol 1 No 1, November 2019, Page 14 – 19 e-ISSN: 2715-2715, 1-6.
- Soekanto, S. (2004). Faktor - Faktor yang Mempengaruhi Penegakan Hukum. Jakarta: PT.Raja Grafindo Persada.
- Sugiyono. (2014). Metode Penelitian Kuantitatif, Kualitatif, dan Kombinasi (Mixed Method). Bandung: Alfabeta.
- Sutiawan, I., & Ramdhani, A. (2021). Polisi Sebut KSP Cinta Damai Sebar Fitnah untuk Menagih Korban. Retrieved 2021, from Gatra: <https://www.gatra.com/detail/news/518350/hukum/polisi-sebut-ksp-cinta-damai-sebar-fitnah-untuk-menagih-korban>
- Waluyo, B. (2002). Penelitian Hukum Dalam Praktek. Jakarta: Sinar Grafika.
- Yannizar, et al. (2020). Analysis of Good Corporate Governance, Free Cash Flow, Leverage towards Earning Management, and Shareholder Wealth in Service Sector Companies Listed on the Indonesia Stock Exchange. Budapest International Research and Critics Institute-Journal (BIRCI-Journal).P. 2567j-2567v.