

Legal Analysis of the Modus Operandi of Terrorism Funding Under the Guise of Charity

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Abstract

Terrorist funding is an important part of a series of terrorist acts. Various methods are used by terrorist groups to obtain funds as an effort to continue to exist to spread radicalism and carry out acts of terror. According to data, the population in Indonesia has a high level of generosity in the world, this makes terrorist groups take advantage of opportunities by using the guise of charity by using non-profit organizations (NPOs) to obtain funds with structured methods and without using violence. This study aims to analyze the mode used by NPOs in carrying out the guise of charity as a medium for collecting funds and the form of formulation for eradicating terrorism

funding that has been taken by the government, as well as to evaluate the effectiveness of these policies and actions in the national context. This study uses a normative legal research method with a statute approach. This study emphasizes the aspect of fundraising carried out by NPOs in a series of terrorism funding activities. The Indonesian government must always control NPOs by coordinating with related institutions. This is a step in overcoming terrorism funding under the guise of charity in order to create safe and responsible fundraising activities which will be explained in this study.

Keywords

Terrorism Funding, NPO, Charity

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Submitted: 26/07/2023 **Revised:** 29/08/2023; 11/09/2023 **Accepted:** 17/09/2023

I. Introduction

Every act of terrorism that occurs essentially requires great support, both in terms of the supply of weapons and ammunition

owned, vehicles for mobilization, residence, and facilities for the needs of terrorist members. All of these things can be categorized as a form of terrorism financing as stated in Law No. 9 of 2013 concerning the Prevention and Eradication of Criminal Acts of Terrorism Financing. There are three stages in terrorist financing, namely fundraising, fund transfer, and use of funds¹. Funds collected by terrorist groups will support the preparation of every planned act of terror. In addition, these funds are used to support the families of convicted terrorists. For example, the terrorist group Jamaah Islamiyah (JI) uses funds to send young JI cadres to study and train in conflict countries such as Syria and Afghanistan². With this, the funds collected are increasingly unclear because they are not used directly for acts of terror.

A series of activities carried out by terrorist groups to plan attacks are very structured and complex and have developed significantly, threatening national security. In the research conducted by Firmansyah & Myharto, they pay more attention to the threat of national and international integrity³. The study emphasized that terrorism funding is the initial foundation that supports the sustainability of the terrorist network, and terrorism

¹ Luthfi Hafidz Rafsanjani, "Konsep Pembuktian Terbalik Sebagai Strategi Pencegahan Dan Pemberantasan Tindak Pidana Pencucian Uang Pada Sektor Pasar Modal Untuk Sarana Pendanaan Terorisme," *Ikatan Penulis Mahasiswa Hukum Indonesia Law Journal* 1, no. 2 (December 31, 2021): 130–41, <https://doi.org/10.15294/ipmhi.v1i2.53264>.

² Ghufuran Afif and Untung Sumarwan, "Analisis Pencegahan Pendanaan Terorisme Melalui Kotak Amal Berdasarkan Situational Crime Prevention Theory," *Jurnal Kertha Semaya* 12, no. 9 (2024): 2290–2307, <https://doi.org/https://doi.org/10.24843/KS.2024.v12.i09.p22>.

³ Rizal Firmansyah and Wiend Sakti Myharto, "Penegakan Hukum Terhadap Kriminologi Pendanaan Terorisme Dalam Perspektif Hukum Nasional (Studi Kasus Putusan No.7/Pid.Sus/2021/PN.Jkt.Tim)," *Jurnal Ilmiah Publika* 10, no. 2 (November 29, 2022): 380, <https://doi.org/10.33603/publika.v10i2.7814>.

funding is an important element in the implementation of various acts of terror.

Referring to the report of the Institute for Economics and Peace (IEP) entitled Global Terrorism Index (GTI) 2024 which shows that Indonesia is still vulnerable to acts of terrorism, in the report Indonesia is ranked fourth in the Asia Pacific region below Myanmar, the Philippines, and Thailand⁴. Therefore, the Indonesian government is expected to always be fully vigilant and not provide any space for terrorist organizations to develop. Then in the eradication of terrorism carried out by the government, it must emphasize that it is not just an effort to handle terrorist perpetrators. However, it is also necessary to pay attention to the factor of terrorism funding, which actually has an important role in sponsoring various forms of crime that are intensified by terrorist networks.

Funds obtained by terrorist networks can come from various sources, one of which is under the guise of charity carried out by humanitarian aid institutions or charitable organizations using charity boxes or through social media. Based on the results of the updated risk assessment of terrorist financing crimes, collecting donations under certain pretexts to attract funding from external terrorist personnel is by spreading charity boxes in various regions in Indonesia. Collecting funds using charity boxes is difficult to detect by the PPATK (Financial Transaction Reports and Analysis Center) because it does not include banking institutions⁵. The

⁴ Dian, "BNPT Ungkap Data Global Terorisme, Indonesia Peringkat 31 Di Dunia," GATRA, 2024, <https://www.gatra.com/news-598720-nasional-bnpt-ungkap-data-global-terorisme-indonesia-peringkat-31-di-dunia.html>.

⁵ Ayu Putu Mira Fajarini, I Made Minggu Widyantara, and I Nyoman Utama, "Peran Pusat Pelaporan Dan Analisis Transaksi Keuangan (PPATK) Dalam Pencegahan Dan Pemberantasan Tindak Pidana Pendanaan Terorisme," *Jurnal Konstruksi Hukum* 3, no. 1 (January 24, 2022): 104–9, <https://doi.org/10.22225/jkh.3.1.4408.104-109>.

charity funds that have been collected are then misused to support acts of terrorism.

The existence of terrorism funding under the guise of charity because society itself is accustomed to donating its assets without first screening the recipients of the funds. This is based on the reality in society that does not pay much attention to the actual destination of the funds being distributed. Charity can be said to be a good deed that receives continuous rewards without interruption, the practice will not run out even though the person who did it has died. The reward of charity will continue to flow to him as long as the living person uses the results of his deeds while in the world⁶. That terrorist groups exploit the label of charity by using NPOs to obtain funds and use them. Levitt explains that terrorist groups hold the concept of "jihad rhetoric: a call for charity", this religious-based rhetoric is carried out to facilitate the course of terror actions⁷.

The rhetoric is also used by terrorist group leaders and religious figures to persuade donors, whether consciously or unconsciously, to give charity and contribute to the related NPO. Cases of terrorism funding under the guise of charity include in October 2022, when 400 charity boxes were successfully secured by the Densus 88 Team in connection with the arrest of three suspected Jamaah Islamiyah terrorists in Lampung. All three were high-ranking officials of the Baitul Maal Abdurrahman Bin Auf Zakat Institution (LAZBM-ABA). The funds collected from public donations using the charity boxes reached IDR 70 million in a month⁸. With the events that occurred above, a deep

⁶ Hafidz Muftisany, *Syarat Sebuah Amal DiTerima* (Intera, 2021).

⁷ Matthew Levitt, *Hamas: Politics, Charity, and Terrorism in the Service of Jihad* (London: Yale University Press, 2006).

⁸ Andita Rahma, "Penangkapan Terduga Teroris Di Lampung, Densus 88 Sita 400 Kotak Amal," *Tempo*, 2021,

understanding is needed regarding charity practices that can be misused for terrorist activities.

The case of terrorism funding in Indonesia shows that philanthropic institutions or non-profit organizations (NPOs) are vulnerable to being used as sources of terrorism funding. Based on the results of the assessment conducted by PPATK, it was revealed that community or non-profit organizations were built only to function as manipulative actions of terrorist organizations to collect or distribute funds by riding on good deeds in the name of ongoing charity⁹. The non-profit organization plays a role in disguise and has been associated with terrorist networks in Indonesia.

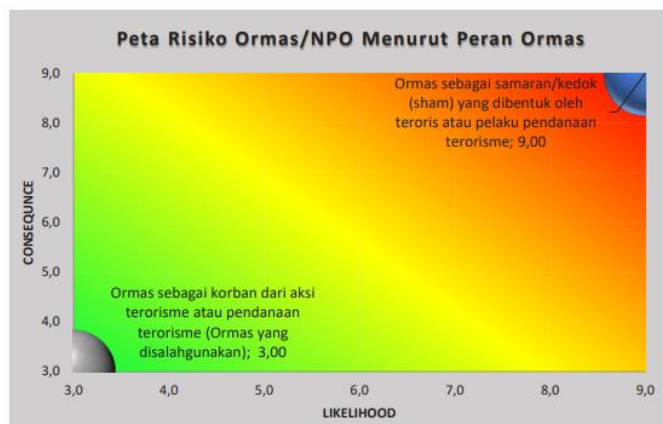


Figure 1 Risk Map of Mass Organizations/NPOs According to the Role of Mass Organizations

<https://www.tempo.co/hukum/penangkapan-terduga-teroris-di-lampung-densus-88-sita-400-kotak-amal--457677>.

⁹ PPATK, “Pengkinian Penilaian Risiko Organisasi Kemasyarakatan Disalahgunakan Sebagai Sarana Tindak Pidana Pendanaan Terorisme” (Jakarta, 2022), <https://www.ppatk.go.id/publikasi/read/166/pengkinian-penilaian-risiko-organisasi-kemasyarakatan-disalahgunakan-sebagai-sarana-pendanaan-terorisme-tahun-2022.html>.

Note: In the above values, values 3 to 5 = Low Risk; >5 to 7 = Medium Risk; >7 to 9 = High Risk.

Source: PPATK Report 2022

Based on the image, it can be seen that the likelihood parameter or the possible frequency of the identified event shows a figure of 9.00, which indicates that the potential for terrorist funding using non-profit organizations to disguise itself is very high. Meanwhile, the consequence parameter or threat shows a figure of 9.00, which means that the danger of non-profit organizations disguised to fund terrorists has a very large impact.

It is recorded that terrorist groups utilize legal philanthropic institutions, even unlicensed ones, to fund their activities. What is concerning is that terrorist groups can create fake funding institutions to fund their activities. Data from the PPATK (Financial Transaction Reports and Analysis Center) of the Republic of Indonesia states that there are 22 NPOs listed in the DTTOT (List of Suspected Terrorism and Terrorist Organizations), 18 are legal entities, and four are not registered (illegal). As of June 2022, there were 488,669 NPOs registered with the Ministry of Law and Human Rights of the Republic of Indonesia. In addition, there are 2,604 organizations registered with the Ministry of Home Affairs of the Republic of Indonesia and 55 foreign organizations registered with the Ministry of Foreign Affairs¹⁰. The large number of Non-Governmental Organizations (NGOs) or NPOs in Indonesia has the potential to be a threat because it can be exploited by terrorist groups.

The terrorist network in Indonesia consisting of Jemaah Islamiah (JI), Jemaah Ansharut Daulah (JAD), Jemaah Ansharusy Syariah (JAS) has connectivity with several NPOs obtained from

¹⁰ Novi Dwi Nugroho et al., "Two Philanthropic Institutions for One Purpose in Different Ways: Utilisation of Religious Philanthropy in Terrorism Financing in Indonesia," *Cogent Social Sciences* 11, no. 1 (December 31, 2025), <https://doi.org/10.1080/23311886.2024.2428370>.

various terrorism and terrorism financing court decisions in 2022 with the following details:

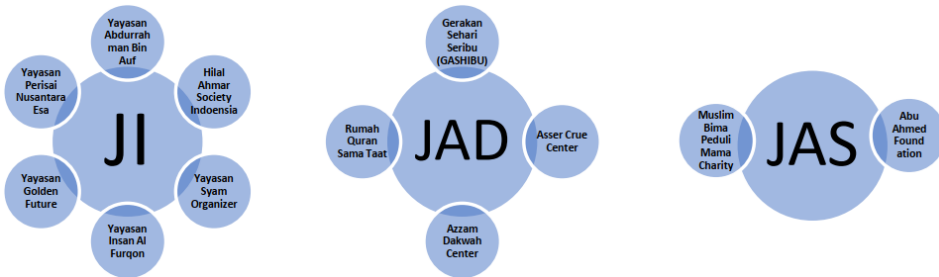


Figure 2 NPO Affiliation with Terrorist Groups in Indonesia
Source: PPATK Report 2022

This research was conducted considering that Indonesian people have a high level of social awareness. The World Giving confirmed that Indonesia in 2021 was named the most generous country in the world, this is proof of the willingness of Indonesian people to donate, especially for religious activities. With the majority of the population in Indonesia being Muslim, it provides excellent potential for fundraising for Islamic institutions or religious activities such as zakat, infaq, shadaqah, and waqf (ZIFWAF) in 2022, which is estimated to reach 22.4 trillion rupiah¹¹. However, as previously explained, this raises the risk of radicalism of activists and terrorist networks that can take advantage of philanthropy or donations intended for humanitarian aid activities, disaster management, war victims to fund acts of terrorism. Given the FATF recommendation No. 8 emphasizes that all member countries must protect legitimate non-profit

¹¹ Sri Yunanto et al., "Misuse of Islamic Charity for Terrorism in Indonesia: Modus, Countermeasures, and Challenges," *Studies in Social Science Research* 4, no. 3 (June 30, 2023): p1, <https://doi.org/10.22158/sssr.v4n3p1>.

organizations and encourage the development of systems that encourage transparency and integrity, thereby preventing non-profit organizations from becoming safe havens for terrorist activities¹².

In a study by Tika Yulianti and Gunawan Nachrawi in 2022 entitled "Modus Operandi of Fundraising for Terrorist Networks during the Covid-19 Pandemic Related to Terrorist Crimes in Indonesia" describes the various modes of terrorism funding used by terror groups. In general, terrorism anxiety after the Covid-19 outbreak has become increasingly difficult to detect. This is because it minimizes contact in funding terrorism. Based on interviews with Densus 88 Anti-Terror, it was found that the modus operandi of terrorism carried out during the Covid-19 pandemic had changed. They have changed the anxiety that led to online activities.

The article studied by Tryantoro Cipto and Iskandar in 2022 entitled "Efforts to Eradicate Islamic Radicalism and Terrorist Funding in Indonesia". The study began by explaining the causes of the birth of radical Islamic movements, which were influenced by two factors, namely disappointment and shallow Islamic religious knowledge and understanding of Islam. And explains the sources of funding for terrorist organizations that can come from legal and illegal sources. As well as efforts to eradicate terrorism in Indonesia. Namely by implementing the concept of wasathiyah Islam in the field of education and issuing regulations on preventing terrorism.

Research conducted by Faisal Mufti Zulfikar, Andina Mustika Ayu, and Pradono Budi Saputro in 2024 entitled "Effectiveness of Implementation of Anti-Terrorism Funding Policy in Indonesia in Reducing Transnational Terrorism Cases, which explains the development of the terrorist groups Jamaah

¹² FATF, "International Standards on Combating Money Laundering and The Financing of Terrorism & Proliferation : The FATF Recommendations." (Paris, 2025), <https://www.fatf-gafi.org/en/publications/Fatfrecommendations/Fatfrecommendations.html>.

Islamiyah and Jamaah Ansharut Daulah and the characteristics related to funding in Indonesia originating from activities involving or as a whole. the issuance of Law No. 9 of 2013. However, looking at the development of terrorist groups in Indonesia, they still exist. Because they change and apply funding patterns that are carried out covertly. From the three previous studies, it contains information that the modes used in collecting funds are very diverse and have their own characteristics and different levels of vulnerability, and efforts to eradicate them generally only refer to the regulations of Law No. 9 of 2013.

This study will discuss more specifically the *modus operandi* of terrorist perpetrators of terrorism by using the guise of charity that uses non-profit institutions as a place to shelter in obtaining funds. This is not without reason, considering that the mode of fundraising using non-profit institutions has the highest risk of being misused by terrorist groups. And what is unique about this study is explaining the ideal formulation in dealing with terrorism under the guise of charity. In terms of enforcing regulations regarding the existence of non-profit institutions in Indonesia and related to strengthening regulations regarding the fundraising ecosystem that is outdated and irrelevant to current developments. That the tendency of Indonesian people who are enthusiastic about charity or donating, especially in religious and humanitarian matters, and the government of the Republic of Indonesia has not been optimal in preventing terrorism funding. Therefore, it is important to conduct this research in an effort to overcome the practice of non-profit institutions that use the name of charity as a medium for collecting funds for terrorist organizations.

II. Method

This study uses a normative legal research method which is also known as doctrinal legal research using a statute approach and a

conceptual approach. The data source that the author uses in this study is secondary data with a literature study approach. By collecting information that is relevant to the topic or problem being studied. This information can be obtained from books, reports issued by the government, scientific papers, regulations, provisions, encyclopedias, and other written sources related to the research. The collected data will be analyzed by searching for and determining the relationship between the data obtained from the research and the problems raised in this study. Data analysis in this study was carried out using the analytical descriptive method, which is a method used to describe a condition or whose purpose is to provide data on the object of research so that it is able to explore things that are ideal, then analyzed based on legal theory or applicable laws and regulations.

III. Result & Discussion

A. Modus operandi of terrorist financing perpetrators

Terrorists need money to finance their actions, including buying weapons, explosives, falsifying documents, preparing soldiers, and providing financial assistance to terrorist families. In the past two decades, terrorism financing has become increasingly complicated and complex because it involves individuals, organizations and international networks. The methods used for financing are increasingly diverse, ranging from charity boxes, hawala, hacking online investment sites to using crypto accounts. Groups such as ISIS and Al Qaeda use methods such as seeking donations, carrying

out robberies, and utilizing technology¹³. Based on The Financial Action Task Force in 2018 as an independent institution that forms policies related to anti-money laundering and terrorism financing¹⁴, it states that some of the origins of terrorism funds include:

- a. Funds provided by the center of terrorist organizations or funds from abroad, this injection of funds is given in large amounts which are used for various terrorist activities. Starting from recruiting new members to expanding the group's network from various regions.
- b. Through digital platforms such as crowd funding and crowd lending. With the rapid development of technology and globalization, this situation has many positive and negative impacts. In this case, the advancement of technology is misused for criminal acts of financing terrorism, and funds obtained from this virtual access pass through countries.
- c. Donations through social media or directly initiated by non-profit organizations such as foundations or charities targeting the community. In addition, it can also be through donations from other non-profit organizations that also support the terror activities.

¹³ Adhitya Yuda Prasetya, Athor Subroto, and Amanah Nurish, "Model Pendanaan Terorisme Melalui Media Cryptocurrency," *Journal of Terrorism Studies* 3, no. 1 (May 30, 2021), <https://doi.org/10.7454/jts.v3i1.1030>.

¹⁴ FATF, "Financing of Recruitment for Terrorist Purposes" (Paris, France, 2018), www.fatf-gafi.org/publications/methodsandtrends/documents/financing-recruitment-terrorist-purposes.html.

- d. Using fraudulent practices and money laundering carried out by members of terrorist groups as a means to obtain and hide illegal funds.

In National Risk Assessment Indonesia Against Terrorism Financing Crimes 2021 explained that currently fundraising carried out by terrorist groups is carried out by utilizing legal means such as through accumulated terrorist group member funds, fundraising collected from NPOs, and through legitimate trade. For details on the application of the mode to obtain funds with the following details¹⁵:

1. Funds originating from legal activities

- a. Selling personal property or property of terrorist family members, whether owned in their own name or through the ownership of their wives and other relatives who are fighting for the terrorist movement.
- b. Through financial donations by terrorist sympathizers in other countries.
- c. Fundraising is also pursued by working as a trader or business owner in a small form or with an official legal entity. In addition to that, to avoid suspicion from law enforcement officers, terrorist groups also carry out fundraising activities legally by establishing a place of business to trade.

¹⁵ V Annisa, "Penilaian Risiko Indonesia Terhadap Tindak Pidana Pendanaan Terorisme Dan Pendanaan Proliferasi Senjata Pemusnah Massal" (Jakarta, 2021), <https://www.ppatk.go.id/publikasi/read/151/penilaian-risiko-indonesia-terhadap-tindak-pidana-pendanaan-terorisme-dan-pendanaan-proliferasi-senjata-pemusnah-massal-tahun-2021.html>.

- d. Terrorist groups place charity boxes in shopping centers in various regions in Indonesia. Terrorist groups use the charity label as propaganda that is easily spread by influencing people to voluntarily donate funds for victims of conflict or natural disasters.
2. Efforts to obtain funds through online media
 - a. Rapid globalization, especially regarding internet networks, has created websites and social media accounts on various applications with branding for fundraising that is very easy to access.
 - b. Organizations use public fundraising driven by NPOs with or without legal status, which displays the perpetrator's account number on the social media account held by the NPO as the beneficiary of the public, by controlling fictitious social media accounts or by manipulating the legitimate/legal social media realm.
 - c. Not only NPOs as a scope, social media is also used to collect funds through accounts in the name of other people or prominent figures as a method to spread radicalism as well as an effort to obtain funds.

However, although silent efforts to obtain funds are often carried out continuously, it does not rule out the possibility that in collecting funds using criminal acts, for example Another case uncovered by Densus 88/AT was the arrest of Salim Salyo in Pontianak, West Kalimantan, in 2019 (Decision Number 1113/Pid/Sus/2019/ PN.Jkt.Tim). The funds obtained from the robbery carried out at a bank in East Java were used to buy firearms and assemble bombs which were handed over to the East Indonesia Mujahidin (MIT) terror network.

That the characteristics of funding are also likely to use electronic payment systems¹⁶. The emergence of Financial Technologies (Fintech) in Indonesia is also blamed for terrorist fundraising. Fintech is used to fund their group activities with social media acting as a humanitarian charity for victims of humanitarian conflict and natural disasters. However, non-bank licensed fund transfer services still exist and are used because of their speed and wide reach. Some of these institutions are the Islamic State of Indonesia (NII), the Indonesian Mujahidin Council (MMI), Jemaah Islamiyah (JI), Jemaah Ansharut Daulah (JAD), and Jemaah Ansharut Khilafah (JAK)¹⁷.

The many modes that can be carried out by perpetrators of funding crimes in Indonesia are disturbing to the public. And what is highlighted in this study is funding with the mode of charity carried out by terrorist networks. This is a concern for the Indonesian people because it is very vulnerable to becoming a source of funding for terrorist groups because it carries religious doctrines and humanitarian issues. And the crime of funding terrorism under the guise of charity is still being investigated by the task force for the list of suspected terrorists and terrorist organizations. Based on the Sectoral Risk Assessment (SRA) of Terrorist Financing Crimes in 2023, it shows that the trend of

¹⁶ Nelin Dias Pratiwi, Ika Riswanti Putranti, and Marten Hanura, "Kerjasama Indonesia-Filipina Dalam Menangani Pendanaan Terorisme Berbasis Money Laundering," *Journal of International Relations Diponegoro* 8, no. 4 (2022): 613–28, <https://doi.org/https://doi.org/10.14710/jirud.v8i4.35450>.

¹⁷ Yudho Taruno Muryanto, Dona Budi Kharisma, and Anjar Sri Ciptorukmi Nugraheni, "Prospects and Challenges of Islamic Fintech in Indonesia: A Legal Viewpoint," *International Journal of Law and Management* 64, no. 2 (January 27, 2022): 239–52, <https://doi.org/10.1108/IJLMA-07-2021-0162>.

collecting funds using the charity label has a high level of risk for funding terrorist acts¹⁸.

In addition to that, corporate institutions that are profit-oriented also carry out actions to collect funds aimed at fundraising and distributing humanitarian aid to groups in need through non-profit institutions, community organizations, or registered foundations to carry out fundraising activities by labeling their activities for charity. That the NPO in carrying out its actions uses the media of charity boxes placed in certain locations which are then distributed to terrorist networks¹⁹.

There are several terrorism funding scandals uncovered by the Densus 88 AT team. As mentioned above, in the first case example, the Jamaah Islamiyah (JI) network received funds of Rp 70 billion per year. Referring to the report of the Baitul Maal Abdurrahman Bin Auf Zakat Charity Institution (LAZ BM ABA), it was stated that the Rp 70 billion collected was not only obtained directly from one source but from many sources²⁰. It was also revealed that there was a foundation active in the social and humanitarian fields that was involved in the terrorism funding

¹⁸ PPAATK, "Penilaian Risiko Sektoral Tindak Pidana Pencucian Uang Dan Pendanaan Terorisme Pada Teknologi Finansial Tahun 2023" (Jakarta, 2023), <https://www.ppatk.go.id/publikasi/read/214/penilaian-risiko-sektoral-tindak-pidana-pencucian-uang-dan-pendanaan-terorisme-pada-teknologi-finansial-tahun-2023.html>.

¹⁹ I Made Wisnu Wardhana, "An Indonesian Perspective on Terror Financing Investigation," *Journal of Defence & Policy Analysis* 1, no. 1 (2021): 80–88, <https://doi.org/http://ir.kdu.ac.lk/handle/345/5268>.

²⁰ Adhyasta Dirgantara, "Raup Rp 70 Juta/Bulan, Teroris JI Sebar 2.000 Kotak Amal Yayasan Di Lampung," *detikNews*, 2021, <https://news.detik.com/berita/d5796680/raup-rp-70-juta-bulan-teroris-ji-sebar-2-000-kotak-amal-yayasan-dilampung>.

chain, namely the Syam Organization. Based on the Densus 88 AT report, the funds collected amounted to Rp 124 billion which had accumulated since 2014. Of the total funds, around Rp 1.2 billion had been transferred to the Jamaah Islamiyah group.

The funds controlled by Syam Organizer come from public donations and companies engaged in logistics. From 2016 to 2021, there were 4,093 complaints about terrorism funding to PPATK. Of these complaints, 207 were analyzed to be handled by the National Police and State Intelligence Agency²¹. The existence of the Syam Organizer Foundation cannot be separated from its association with the Jamaah Islamiyah group. The method of collecting funds used is by distributing charity boxes in the form of piggy banks to the community. They take advantage of winning the hearts of the community using the label of charity and humanitarian issues in Palestine and Syria. To donate funds, send food and drink supplies, clean water, build houses and public facilities. So that people who see the charity box media are moved to do charity and donate some of their wealth to help those affected by the humanitarian conflict.

LAZBM ABA and Syam Organizer act as the main fundraising institutions for the JI group. Although both collect, store, transfer, and utilize funds for the group, there are several similarities and differences between the two. The methods used are both having branch offices in the regions, programs with religious nuances, using charity boxes-donation cans-proposals-bank

²¹ Karin Nur Secha, "Densus 88 Ungkap Pengumpulan Dana Kelompok Teroris JI Capai Rp 124 M," detikNews, 2021, <https://news.detik.com/berita/d-5690638/densus-88-ungkap-pengumpulan-dana-kelompok-teroris-ji-capai-rp-124-m>.

accounts, targeting the general public and JI members, and producing output in the form of money. Despite their similarities, LAZBM ABA and Syam Organizer also have differences, especially in terms of the strategies used. It is known that LAZBM ABA uses offline fundraising methods by sending proposals to well-off community leaders under the guise of humanitarian programs in Indonesia. For example, they sent a proposal to the Ciputra Cimone Taklim Assembly which generated funds of IDR 30,000,000 for the natural disaster in Lombok in 2018²². Meanwhile, Syam Organizer tends not to only rely on charity boxes and piggy banks. But it is also accompanied by targeting donors by sending proposals and organizing many large tables. There are 17 charity boxes and 201 piggy banks used by Syam Organizer to collect funds for the community and its members²³.

However, if the funds from the number of charity boxes are not too strategic for Syam Organizer, they will use fundraising media. The fundraising carried out has one significant strength through the grand tabligh. The grand tabligh involves religious lectures delivered by JI preachers who are experts in the field of da'wah, together with religious figures from Palestine and individuals who have experience in Syria and Palestine. That these actions appear to be carried out by a single perpetrator, but these actions actually have a base of supporters and ideology that can legalize or justify their actions²⁴. These lectures are intended to

²² Nugroho et al., "Two Philanthropic Institutions for One Purpose in Different Ways: Utilisation of Religious Philanthropy in Terrorism Financing in Indonesia."

²³ Nugroho et al.

²⁴ Ali Masyhar and Ridwan Arifin, "Urgensi Pembentengan Masyarakat Dari Radikalisme Dan Terorisme (Upaya Terhadap Jamiyyah Nahdlatul Ulama

encourage the public to sympathize with the situation in Syria and Palestine. Among them is the action of raising funds for the " Water for Syam " project by sending clean water supplies to Palestine. In addition, other actions are " Save Children of Syam " in Syria and Palestine, then there is also fundraising in the form of a " Winter Aid Project " namely by providing jackets and building houses in Syria during the winter²⁵. The preachers delivered their sermons in a peaceful manner, which tended to make the public and the security forces of the Republic of Indonesia more sympathetic to these goals.

It is interesting to observe how this institution raises funds and attracts public support. They use religious methods as the main means of obtaining funds, such as charity boxes, shodaqoh, infaq and tabligh akbar. LAZBM ABA relies on popular Ustadz or influential figures in society, while Syam Organizer uses Ustadz who are experienced in Syria or Syam. It can be concluded that the allocation of terrorist funds by these two institutions is different. Although both are for the JI group, LAZBM ABA tends to allocate funds for the Indonesian region, while Syam Organizer tends to allocate funds for the Syrian region.

The mode of funding terrorism under the guise of charity is a common problem because it is easy to implement and difficult to trace. Given that donations can be made in cash and distributed to

Kecamatan Bonang Kabupaten Demak)," *Jurnal Pengabdian Hukum Indonesia (Indonesian Journal of Legal Community Engagement)* 1, no. 1 (2018): 1–12, <https://doi.org/https://doi.org/10.15294/jphi.v1i01.27259>.

²⁵ Adhyasta Dirgantara, "Polri: Syam Organizer Yayasan Amal Milik JI, Alirkan Dana Untuk Terorisme," *detikNews*, 2021, <https://news.detik.com/berita/d-5684369/polri-syam-organizer-yayasan-amal-milik-ji-alirkan-dana-untuk-terorisme>.

members, it is difficult to detect funds for terrorist activities. In addition, the fundraising activities are carried out through legal activities and are carried out by institutions that have received permission from the relevant institutions. This is due to the camouflage carried out so that it succeeds in deceiving the public and even ministries and government agencies²⁶. The ease of fundraising and camouflage through religious activities is what caused Syam Organizer, which has been operating since 2013, to only be included by law enforcement officers in the List of Suspected Terrorists and Terrorist Organizations in 2022. This shows that the guise of charity for humanitarian aid is easy to manipulate and its handling is not easy.

B. The ideal formulation to overcome the modus operandi of terrorism funding under the guise of charity

The rise of institutions with religious and humanitarian backgrounds in order to support terrorist groups is an indicator that the government has not been fully optimal in handling terrorism funding. That Indonesia's efforts to criminalize the crime of terrorism funding by ratifying *the International Convention for the Suppression of the Financing of Terrorism 1999* which has been ratified as Law Number 6 of 2006 concerning the ratification of *the International Convention for the Suppression of the Financing of Terrorism 1999*, thus requiring Indonesia to

²⁶ Ali Masyhar et al., "Digital Transformation of Youth Movement for Counter Radicalism," 2022, 030010, <https://doi.org/10.1063/5.0109808>.

include and synchronize the convention in positive law in Indonesia.

Referring to Law Number 9 of 2013 concerning the Prevention and Eradication of Criminal Acts of Terrorism Financing, the approach used in this law is to *follow the money*, with the intention of cutting off plans for acts of terror. Before the law, the approach used was to *follow the suspect* in accordance with the law on terrorism. This shift in approach was made on the grounds that many events had been revealed during terrorism investigations, namely the source of excessively large funds coming from unknown accounts or parties suspected of being the main suppliers of funds for terrorist networks.

Referring to the opinion of Prof. Bill Tupman as an Australian anthropologist, he revealed that after the terror incident at the WTC building in the United States, millions of US dollars had been confiscated. Experts agree that preventing terrorism begins with efforts to overcome and break the chain of the funding path ²⁷. In Law Number 9 of 2013, in detecting the flow of funds used, it is necessary to involve financial service providers, providers of goods and services, law enforcement officers and international cooperation. As stated in the study entitled "Counter Intelligence Strategy in Facing the Transformation of Jamaah Islamiyah Terrorism Funding", a comprehensive coordination mechanism is needed and involves many policy makers to overcome criminal acts of terrorism funding ²⁸.

²⁷ Djoko Sarwoko, *Pendanaan Terorisme: Pergeseran Politik Hukum Pencegahan Dan Pemberantasannya Di Indonesia* (Yogyakarta: Genta Publishing, 2018).

²⁸ Ika Veni Anisa and Muhamad Syauquillah, "Strategi Kontra Intelijen Dalam Menghadapi Transformasi Pendanaan Terorisme Jamaah Islamiyah," *Syntax Literate; Jurnal Ilmiah Indonesia* 7, no. 11 (November 20, 2022): 17055–69, <https://doi.org/10.36418/syntax-literate.v7i11.11944>.

Law Number 9 of 2013 expands the scope of potential threats of terrorism financing, regulates the principles of recognizing financial service users, monitoring cash carrying, reporting compliance monitoring, blocking schemes, and placement on the list of suspected terrorists and terrorist organizations, as well as establishing national and international cooperation in dealing with activities that support criminal acts of terrorism²⁹. Several forms of prevention against terrorism financing are stated in Article 11 of Law 9 of 2013, including:

- a. Application of Authorization Principles for Financial Services Users.
- b. Reporting and Monitoring of Financial Service Provider Compliance.
- c. Monitor fund transfer activities through money transfer systems or fund transfers using other systems.
- d. Monitor the movement of cash and/or other payment instruments entering and leaving the Indonesian customs area.

That terrorism funding will be very risky when compared to other crimes due to the strategy of using NPOs as a source of fundraising and expertise in breaking through the financial system of developing countries. Not limited to that, the origin of terrorism funds can also come from legal and halal businesses which have an impact on the increasing difficulty of tracking and proving terrorism funds. With the many non-profit institutions carried out in the community, in addition to having a positive impact if the use of these non-profit institutions is operated by administrators wisely. However, it will be a complex problem of the manipulation carried out so that it is not easy to overcome. In

²⁹ Iqlillah Febriana, "Pengaruh Kerja Sama Indonesia Dan Filipina Terhadap Penanggulangan Terorisme Tahun 2014 - 2017," *Jurnal Ilmu Hukum Dan Politik* 1, no. 3 (2023): 197–209, <https://doi.org/https://doi.org/10.51903/perkara.v1i3.1368>.

the Counter Terrorism Financing Summit Forum in Sydney, it was explained regarding the obstacles experienced by the Indonesian government with the investigation mechanism, there are challenges, namely:

- a. The financial transaction patterns carried out by terrorists are generally carried out in cash with relatively small transaction amounts.
- b. In order to move funds, terrorists carry the money in cash across national borders.
- c. Inclusion of False Identity.
- d. Specific characteristics found in terrorist financing.
- e. A series of transaction patterns that can be read from the bank's transaction documents.
- f. Cash withdrawal at ATM.
- g. The implementation of new payment methods discovered and used by terrorists to fund the activities of radical groups

³⁰.

Therefore, related to the problematic mode of fundraising under the guise of charity carried out by NPOs, a formulation is needed that can be implemented by the authorities. In this case, the government has issued Law Number 17 of 2013 concerning Community Organizations, but the law only regulates the administrative aspects and general management of NPOs. Therefore, as mandated by FATF Recommendation Number 8 and as part of Indonesia's commitment to protecting the non-profit sector, the government in this case updated Law 17 of 2013 with the issuance of Law 16 of 2017 which regulates in more detail the prohibition and sanctions against NPOs that support terrorism.

However, seeing Indonesia as a place for at least six types of

³⁰ Sarwoko, *Pendanaan Terorisme: Pergeseran Politik Hukum Pencegahan Dan Pemberantasannya Di Indonesia*.

NPOs. The six types are distinguished based on their respective characteristics. Such as community organizations, foundations, zakat institutions, associations, foreign community organizations and social welfare institutions. Of the six NPOs, they are supervised by several ministries in Indonesia. Thus, there is no centralized system to monitor NPOs in Indonesia, and when referring to Othman & Ameer has identified this problem and emphasized that the current decentralized NPO registration and management system is ineffective ³¹. In order to address this issue, the Indonesian government created an integrated non-decentralized institution. The NPO task force is coordinated by the Ministry of Home Affairs based on Presidential Regulation No. 18 of 2017 concerning Procedures for Receiving and Providing Donations by Community Organizations in the Prevention of Criminal Acts of Terrorism Financing, which functions as a formal mechanism for sharing information between institutions.

This step is taken as an ongoing effort by the Indonesian government to change its strategy from a decentralized model to a semi-centralized model that regulates NPOs. By building a centralized data management system for NPOs in accordance with Law 16 of 2017, Indonesia adapts to the situation and modernizes its system to address the problems of decentralized NPO registration and control. As explained in the Terrorism Financing Risk Assessment, several related ministries provide web-based public access as authorized ministries. The existence of this platform can be used as monitoring for the public and policy

³¹ Radiah Othman and Rashid Ameer, "Institutionalization of Risk Management Framework in Islamic NGOs for Suppressing Terrorism Financing," *Journal of Money Laundering Control* 17, no. 1 (January 7, 2014): 96–109, <https://doi.org/10.1108/JMLC-02-2013-0006>.

makers against NPOs involved in terrorism financing actions.³²

The rampant manipulative actions carried out by non-profit organizations using the guise of charity create their own challenges in overcoming them. Given the challenges that have been described above, the characteristics of the charity mode are something that must be watched out for. For this reason, the government in this case should make efforts to handle this mode, by tightening supervision of non-profit institutions and organizations in the community, both for registration and during the running of non-profit organizations.

So that it can be a control for overcoming criminal acts of terrorism financing. That the government must identify non-profit organizations and assess the risks related to terrorism financing actions. In addition, the government must also have structured, focused, proportional and risk-based steps without disrupting or hindering the activities of legal non-profit organizations. The purpose of these steps is an effort to protect so that the charity guise mode that is often used by non-profit organizations can be resolved properly. Given that terrorist organizations often disguise themselves as legal organizations by utilizing them as terrorist funding channels.

With the existence of Law Number 9 of 2013, it shows that Indonesia has prioritized the prevention of terrorism financing, through this regulation requiring several policy makers to proactively monitor, filter and report various suspicious forms that lead to terrorism financing. With an asset freezing mechanism as a quick step to blacklist individuals and organizations that provide financial support for terrorist organizations. In addition, related to the guise of charity that is often carried out by NPOs,

³² PPATK, "Penilaian Risiko Indonesia Terhadap Kejahatan Pendanaan Teroris Tahun 2015 Yang Diperbarui" (Jakarta, 2019), <https://www.ppatk.go.id/publikasi/read/93/pengkinian-penilaian-risiko-indonesia-terhadap-pendanaan-terorisme-tahun-2015.html>.

the government in this case uses various formulations starting from forming regulations that become a legal umbrella for NPOs, such as Law Number 17 of 2013 concerning Community Organizations which was later amended by Law Number 16 of 2017, which contains articles that regulate prohibitions, administrative sanctions, and criminal behavior of organizations that assist terrorism.

Basically, Presidential Regulation Number 18 of 2017 aims to supervise and control the movement of funds from and to non-profit institutions in order to prevent terrorism funding. However, the deficiency is the lack of information regarding the Presidential Regulation in the community regarding the procedures for receiving and distributing donations for NPOs in order to prevent terrorism funding. Therefore, socialization and education are needed for the community, especially regarding terrorist funding under the guise of charity through NPOs. As a community or NPO member, we must always adhere to "*know your donors*" and "*know your beneficiaries*" in order to prevent terrorism funding from entering the NPO sector, as referred to in Presidential Regulation Number 18 of 2017.

In addition to strengthening the aspects of NPO control and supervision. Regulations are also needed to strengthen the practice of collecting donations with the label of charity or humanity (philanthropy). That the legal protection that underlies the fundraising ecosystem in Indonesia is Law Number 9 of 1961 concerning the Collection of Money or Goods. Referring to Article 1 of Law Number 9 of 1961, it is determined that the collection of money or goods is "*every effort to obtain money or goods for development in the fields of social welfare, mental/religious/spiritual, physical and cultural fields*". Based on this definition, it is in line with the meaning of philanthropy. However, by looking at the substance of the Law Number 9 of 1961, it is no longer in accordance with current advances. This is

due to the rapid transformation of philanthropy which increasingly utilizes existing technology and the increasingly diverse mechanisms for distributing money or goods. There are several points that must be updated regarding the Law Number 9 of 1961, including:

- a. The Law Number 9 of 1961 has a paradigm of temporary public fundraising permits and does not yet consider the form of sustainable philanthropic institutional activities.
- b. Not anticipating the use of digital technology, such as *crowdfunding* or *crowdsourcing* including social media.
- c. Has not accommodated the diversity of philanthropy, fundraising modes and funding sources.
- d. The burden of accountable and transparent reporting, supervision and coaching is not yet strong.
- e. Not oriented towards preventing and eradicating criminal acts of terrorism financing and money laundering.
- f. The criminal provisions are very light, namely three months in prison and a fine of IDR 10,000.

Based on the description above, it reflects that Law Number 9 of 1961 cannot be said to be ideal for reducing the misuse of funds for terrorist activities today. Therefore, efforts are needed to revise Law Number 9 of 1961 so that the regulations made follow current developments. This is done as a preventive measure for terrorist groups using the name of charity as a medium to collect funds in Indonesia. Although the Minister of Social Affairs Regulation No. 8 of 2021 concerning the Implementation of the Collection of Money or Goods has been issued. However, this regulation only focuses on licensing and does not cover the complexity of collecting money and goods. Considering that based on the Constitutional Court Decision Number 82/PUU-XI/2013 concerning the judicial review of Law Number 17 of 2013 concerning Community Organizations which in essence gives authority to NPOs in Indonesia. So that

this creates a threat to the handling of criminal acts of terrorism financing in Indonesia. According to data, cases of fundraising with the status of unregistered organizations are often involved in fundraising for the distribution of terrorist funds.

So to prevent the operation of unregistered NPOs in collecting funds, regulations are needed that can accommodate a comprehensive fundraising system in order to prevent modes that use the name of charity as a shortcut in obtaining funds distributed to terrorist networks. One way is to revise Law No. 9 of 1961 so that it can follow the various existing transformations, tightening the system. And collaborating between state institutions to eradicate the guise of charity as a supplier of funds for terrorists to help identify and mitigate opportunities for misuse of donation funds. Given that terrorist activities in a country operate as if there is no connectivity with international organizations, it can be ascertained that if examined more deeply there is a real connection³³. And ensure that the funds collected are used for positive activities and create a safer and more responsible fundraising ecosystem.

IV. Conclusion

Based on the findings of the researcher in this study, the researcher concluded that the *modus operandi* in the act of collecting terrorist funds can be carried out using various existing methods. One that is very vulnerable to being exploited by terrorist organizations is by using non-profit institutions as a camouflage medium through religious activities as a fundraiser for terrorist

³³ Ali Masyhar, "Rekonstruksi Cegah Tangkal Dalam Bingkai Penanggulangan Tindak Pidana Terorisme," *Seminar Nasional Hukum Universitas Negeri Semarang* 3, no. 1 (2017): 1–14, <https://journal.unnes.ac.id/sju/index.php/snh%0D>.

activities. By using charity boxes or using online media, terrorist networks are very active in carrying out their actions in collecting funds. In addition, it was also found that terrorist organizations through the non-profit institutions they founded in attracting public support can take the form of religious events such as holding a grand tabligh. The substance of the lecture is aimed at encouraging the public to sympathize with the conditions in Syria or Palestine and be moved to donate their wealth.

In handling terrorist funding involving non-profit institutions, the government has a central role in issuing policies as a countermeasure. The actions that have been taken are to regulate the registration system for non-profit institutions which were previously decentralized into a semi-centralized system coordinated by the Ministry of Home Affairs. This system can overcome problems regarding supervision and control for non-profit institutions. And there is a platform that can be used by the public and policy makers for non-profit institutions that have an existence in terrorist funding activities. However, massive socialization to the public regarding the policy is still needed, so that they are more aware of non-profit institutions that carry out fundraising activities in the public sphere. In addition to strengthening the non-profit institution sector, efforts are needed to strengthen the philanthropic ecosystem in Indonesia. Given that existing regulations are no longer relevant today to be used as a reference. The government in this case needs to update regulations related to collecting money and goods so that philanthropic activities are created that are in accordance with legal procedures and not just any party can raise funds in the community.

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Acknowledgment

None

Funding Information

None

Conflicting Interest Statement

There is no conflict of interest in the publication of this article.

Publishing Ethical and Originality Statement

All authors declared that this work is original and has never been published in any form and in any media, nor is it under consideration for publication in any journal, and all sources cited in this work refer to the basic standards of scientific citation.