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THE CRIMINAL RESPONSIBILITY FOR ABUSE OF AUTHORITY IN BLOCKING ONLINE GAMBLING BASED ON INDONESIAN CYBER LAW

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ABSTRACT

Online gambling in Indonesia has developed into a complex cybercrime involving not only players, operators, promoters, and site administrators, but also officials who control access-blocking systems. This study aims to examine criminal law regulation of online gambling involving state officials, analyze their criminal liability for abuse of blocking authority, and formulate a supervision and law enforcement model for protecting Indonesia's digital space. This study uses doctrinal legal research with statutory, case, and conceptual approaches. The findings show that online gambling regulation is constructed through the National Criminal Code, the ITE Law, the State Civil Apparatus Law, regulations on electronic systems and private electronic system providers, and the Money Laundering Law. State officials may be held criminally liable when abuse of authority is proven through intent, contribution to the continued accessibility of gambling sites, receipt of benefits, participation, assistance, or concealment of gambling proceeds. The formulated model combines access-based supervision, audit trails, digital records, periodic site verification, electronic evidence, role-based liability, and follow-the-money investigation. The novelty lies in linking public authority, digital access control, mens rea, role-based

	participation, economic benefit, and criminal enforcement within one integrated framework.

1. INTRODUCTION

The online gambling has become a serious challenge for the control of Indonesia's digital space because this crime no longer operates only through players, bookies, admins, or promoters, but also through websites, applications, payment channels, and access to digital content control systems.[1] The urgency of this issue increases when the authority to block online gambling sites, which should function as a state instrument to protect public order, is allegedly misused by parties connected to government authority. In a state based on law under Article 1 Paragraph (3) of the 1945 Constitution of the Republic of Indonesia, every exercise of public authority must remain within legal limits and be directed to the public interest. Abuse of site-blocking authority therefore raises a serious criminal law issue because state authority is no longer used to eradicate online gambling, but can become a means to maintain the operation of gambling sites.[2]

Criminal law has an important position in a state of law because it functions to maintain social order by formulating prohibitions, criminal threats, and accountability mechanisms for perpetrators of criminal acts.[3] The development of a society that is increasingly dependent on information technology has driven a shift in the form of crime from physical to digital spaces. Gambling, which previously took place through specific venues, local bookies, or closed networks, now operates through websites, apps, social media, instant messaging services, bank accounts, e-wallets, and QRIS. Online gambling is a form of digital crime that is eroding the community's economy, undermining family resilience, triggering further crime, and turning the digital space into a vibrant arena for illicit transactions.[4]

The prohibition of gambling in Indonesian criminal law is currently based primarily on Law Number 1 of 2023 concerning the Criminal Code. The National Criminal Code regulates the crime of gambling in Articles 426 and 427, which differentiate criminal liability between those who offer, provide opportunities, make gambling a livelihood, participate in gambling

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[1] Muh Alfikram Azis et al., Tindak pidana judi online sebagai kejahatan siber: Analisis normatif terhadap efektivitas regulasi di Indonesia, *Innovative: Journal of Social Science Research*, Vol.5, No.4 (2025), p.3912-3928, DOI: 10.31004/innovative.v5i4.20675

[2] Jamilah et al., Negara Hukum dan Hak Asasi Manusia di Indonesia, *AKSIOMA: Jurnal Sains Ekonomi dan Edukasi*, Vol.2, No.5 (2025), p.898-912, DOI:10.62335/aksioma.v2i5.1198

[3] Maulidya Winatasya dan Citra Dwi Rahayuningsih, Hukum Pidana: Kajian Literature Review, *Journal of Literature Review*, Vol.1, No.1 (2025), p. 154-160, DOI:10.63822/nrtk1447

[4] Krisna Indrawan and M. Ruhly Kesuma Dinata, Analisis Yuridis Tindak Pidana Perjudian Online di Indonesia dalam Putusan Nomor 244/Pid.B/2024/PN Kbu, *Arus Jurnal Sosial dan Humaniora*, Vol.5, No.1 (2025), p.683-687, DOI:10.57250/ajsh.v5i1.1108

enterprises, and those who use the opportunity to gamble.[5] These regulations indicate that gambling is positioned as a criminal offense that attacks public order, damages social life, and opens up space for the birth of unlawful economic profits. Advances in technology have brought about changes and rapid shifts in a life without limits.[6] Technological developments then expanded gambling facilities into electronic media, so that criminal regulations are also based on Law Number 1 of 2024 concerning the Second Amendment to the Electronic Information and Transactions Law. Article 27 Paragraph (2) of the ITE Law prohibits any person from intentionally and without authority distributing, transmitting, or making accessible electronic information and/or electronic documents containing gambling content, while Article 45 Paragraph (3) regulates the criminal threats for such acts.[7]

The scale of online gambling in Indonesia shows a significant threat level. PPATK recorded that the turnover of online gambling funds in 2025 reached IDR 286.84 trillion through 422.1 million transactions, with 12.3 million people making deposits through bank channels, e-wallets, and QRIS.[8] These figures demonstrate that online gambling has evolved into a financial crime octopus, siphoning off vast sums of public funds. The circulation of these funds also demonstrates that online gambling operates through a vast, obscure, and repetitive payment network, requiring law enforcement to collaborate with law enforcement officials, financial transaction supervisory agencies, electronic system providers, payment service providers, and ministries authorized to regulate the digital space.[9]

The government has positioned content blocking as a key tool in eradicating online gambling. The Ministry of Communication and Digital (Komdigi) recorded that from October 20, 2024, to September 16, 2025, more than 2.8 million pieces of negative content were processed for removal from Indonesia's digital space, 2.1 million of which were gambling content.[10] The data shows that the government is taking significant action to clean up the digital space of gambling-related sites, accounts, links, and content. Blocking acts as the first barrier to limit

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[5] Ignasius Yosanda Nono, Anak Agung Sagung Laksmi Dewi, and I. Putu Gede Seputra, Penegakan Hukum Terhadap Selebgram Yang Mempromosikan Situs Judi Online, *Jurnal Analogi Hukum*, Vol.3, No.2 (2021), p.235-239, DOI: 10.22225/ah.3.2.2021.235-239

[6] Andri Winjaya Laksana, Cybercrime Comparison Under Criminal Law In Some Countries, *Jurnal Pembaharuan Hukum*, Vol.V, No.2 (April-Agustus 2018), p.217-226 DOI: https://dx.doi.org/10.26532/jph.v5i2.3008

[7] Ridho Dwi Rahardjo and Wiwik Afifah, Kesesuaian Permenkominfo Nomor 05 Tahun 2020 dengan prinsip kebebasan berpendapat dan berekspresi dalam hak asasi manusia, *Bureaucracy Journal: Indonesia Journal of Law and Social-Political Governance*, Vol.2, No.2 (2022), p.472-486, DOI: 10.53363/bureau.v2i2.48

[8] Pusat Pelaporan dan Analisis Transaksi Keuangan, "Catatan Capaian Strategis PPATK Tahun 2025: Menjaga Kedaulatan dan Integritas Ekonomi Bangsa", 28 Januari 2026, https://www.ppatk.go.id/siaran_pers/read/1594/catatan-capaian-strategis-ppatk-tahun-2025-menjaga-kedaulatan-dan-integritas-ekonomi-bangsa-jakarta-28-januari-2026-b001hm0531i2026-.html, accessed on May 10, 2026

[9] Immanuel Maykael Martono Reinhard Hutagaol et al., Tanggung Jawab Hukum Perusahaan Penyedia Jasa Pembayaran (PJP) terhadap Penyalahgunaan Kanal Pembayaran untuk Transaksi Ilegal, *Corpus Juris: Jurnal Ilmu Hukum*, Vol.2, No.1 (2026), p.21-30, DOI:10.62335/corpusjuris.v2i1.2433

[10] Kementerian Komunikasi dan Digital, SAMAN Siap Operasi Penuh Oktober, 2,1 Juta Konten Judol Sudah Ditindak, 17 September 2025, https://www.komdigi.go.id/berita/siaran-pers/detail/saman-siap-operasi-penuh-oktober-21-juta-konten-judol-sudah-ditindak, accessed on May 10, 2026

public access to online gambling sites, while criminal enforcement is the way to pursue perpetrators, managers, financiers, promoters, and those who profit from these activities.[11]

The state's authority to eradicate online gambling depends heavily on the integrity of the civil servants carrying out government functions. Law Number 20 of 2023 concerning the State Civil Apparatus establishes ASN as a profession for civil servants and government employees with employment contracts who work for government agencies. The law also includes directions for strengthening merit system oversight, digitizing ASN management, and establishing a professional apparatus in the provision of public services. The status of the state apparatus determines the authority to block websites, monitor content, and control digital space by government institutions. The integrity of the apparatus is the main bulwark so that state authority works in the public interest, not to protect criminal networks.[12]

The legal issue in this case lies in the alleged abuse of site-blocking authority, which should have been used to block online gambling access, but was instead directed to protect certain sites from continuing to operate. The online gambling case within the Komdigi area demonstrates the link between electronic gambling crimes and the misuse of access to digital space control systems. In 2025, the South Jakarta District Court sentenced MN and HE to four years and eight months in prison, respectively, for their role in managing an online gambling site agent within the Komdigi area.[13] This case shows that online gambling does not only operate through ordinary players or operators, but can also be linked to parties who are close to state authorities in blocking digital content.

Another case in the Komdigi online gambling scandal also highlights the criminal dimension of money laundering. DA was sentenced to four years in prison for alleged money laundering related to the management of the Komdigi online gambling site, after prosecutors had previously demanded twelve years in prison. The series of cases involving coordinators, former Komdigi employees, online gambling site agent managers, and other parties suspected of money laundering demonstrates the connections between site managers, intermediaries, the flow of funds, and those with access to digital control.[14] This relationship places participation, assistance, intent, acceptance of benefits, and criminal responsibility based on the role of each perpetrator as criminal law issues that need to be analyzed in more depth.

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[11] Sartika Dewi et al., Implementasi Kebijakan Hukum dalam Pemberantasan Judi Online di Indonesia ditinjau dari Persfektif Politik Hukum, *Cendekia: Jurnal Hukum, Sosial dan Humaniora*, Vol.3, No.2 (2025), p.1057-1070, DOI: 10.70193/cendekia.v3i2.214

[12] Pika Sari et al., The Application of Criminal Sanctions to Law Enforcement Officers Involved in Online Gambling, from the Perspective of Legal Positivism, *Indonesian Journal of Innovation Studies*, Vol.24, (2023), p.1-13, DOI:10.21070/ijins.v25i.977

[13] ANTARA, "Terdakwa Pengelola Agen Situs Judol Kominfo Divonis Empat Tahun," 2 September 2025, https://www.antaranews.com/berita/5082857/terdakwa-pengelola-agen-situs-judol-kominfo-divonis-empat-tahun, accessed on May 10, 2026

[14] Tempo, "Terdakwa TPPU Judi Online Komdigi Divonis 4 Tahun Penjara," 27 Agustus 2025, https://www.tempo.co/hukum/terdakwa-tppu-judi-online-komdigi-divonis-4-tahun-penjara-2063711, accessed on May 11, 2026

The gap between applicable law and the reality of law enforcement is evident in the discrepancy between the state's mandate to eradicate online gambling and the alleged involvement of parties with access to the site blocking system. Criminal law has criminalized gambling, the ITE Law has threatened the content of electronic gambling, and state apparatus law has imposed a professional obligation on government administration. The online gambling case in Komdigi highlights issues regarding the criminal liability of state officials, proving the element of malicious intent (mens rea), the relationship between position and criminal acts, and the link between online gambling, abuse of authority, and money laundering.[15]

Previous research on online gambling has shown several directions. Khotimah's 2025 study discussed the criminal liability of online gambling content creators. The study focused on perpetrators who create and distribute online gambling content, thus emphasizing the criminal liability of perpetrators in the digital space.[16] Rangkuti and Rifaldi's 2025 research touched on the protection of online gambling sites by Komdigi employees, but the focus of the discussion was more on bureaucratic ethics, good governance, and violations of the law by active Komdigi employees.[17] Maulana's 2026 research discussed the authority of the Ministry of Communication and Digitalization in blocking online gambling applications and sites based on the ITE Law, with the main emphasis on administrative authority and cyber law.[18]

Based on these studies, the research gap in this study lies in the absence of studies that specifically position state officials as subjects of criminal responsibility for the abuse of authority to block online gambling sites. The analysis focuses on the relationship between official authority, intent, criminal acts, receipt of profits, forms of participation, and the possible link between electronic gambling and money laundering. This study aims to analyze the criminal law regulations for online gambling involving state officials, examine the forms of criminal responsibility of state officials for the abuse of authority to block online gambling sites, and formulate a model for strengthening supervision and criminal law enforcement against officials who have access to digital space control systems.

2. RESEARCH METHODS

This study uses doctrinal legal research with descriptive-analytical research specifications. Doctrinal legal research is used because the study focuses on examining legal norms, legal

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[15] Vaulus Julianta Nano et al., Analisis Teoritis Dolus dan Culpa dalam Konsep Kesalahan sebagai Dasar Pertanggungjawaban Pidana, *Al-Zayn: Jurnal Ilmu Sosial & Hukum*, Vol.4, No.2 (2026), p.6241–6251, DOI:10.61104/alz.v4i2.5100

[16] Khusnul Khotimah et al., Pertanggungjawaban Pidana Pembuat Konten Perjudian Online Berbasis Live Streaming Ditinjau Dari Kuhp dan UU ITE, *Jurnal Riset Multidisiplin Edukasi*, Vol.2, No.12 (2025), p.885-894, DOI:10.71282/jurmie.v2i12.1401

[17] Muhammad Yunus Rangkuti and Rio Rifaldi, Analisis Etika dan Hukum Dalam Perlindungan Situs Judi Online Oleh Pegawai Komdigi (Studi Kasus Klaster Pegawai di Kementerian Komunikasi dan Digital), *Jurnal Penelitian Ilmiah Multidisipliner*, Vol.1, No.04 (2025), p.1299-1303.

[18] Arnaz Maulana et al., Otoritas Kementerian Komunikasi dan Digitalisasi dalam Pemblokiran Aplikasi dan Situs Judi Daring Menurut Undang-Undang ITE, *Al-Zayn: Jurnal Ilmu Sosial & Hukum*, Vol.4, No.2 (2026), p.42-54, DOI:10.61104/alz.v4i2.4244

principles, criminal liability concepts, and the construction of abuse of authority in online gambling cases involving state officials. The approaches used in this study include a statutory approach, a case approach, and a conceptual approach. The statutory approach is applied by examining legal instruments related to online gambling, electronic information, state apparatus authority, access termination, and money laundering, including the National Criminal Code, the Electronic Information and Transactions Law, the State Civil Apparatus Law, Government Regulation on the Implementation of Electronic Systems and Transactions, regulations on Private Electronic System Providers, and the Money Laundering Law. The case approach is used to analyze online gambling cases within the Komdigi environment, especially those related to the misuse of access-blocking authority and the flow of gambling proceeds. The conceptual approach is used to examine the concepts of criminal liability, mens rea, actus reus, participation, assistance, abuse of authority, electronic evidence, and follow-the-money enforcement. The legal materials used consist of primary legal materials in the form of laws and regulations, secondary legal materials in the form of books, journals, research results, expert opinions, and legal articles, as well as tertiary legal materials in the form of legal dictionaries, encyclopedias, and other supporting sources. Legal materials were collected through library research and document study. The collected legal materials were analyzed qualitatively using grammatical, systematic, and teleological interpretation by linking legal norms with the role of state officials, the misuse of blocking authority, the continued accessibility of online gambling sites, receipt of benefits, and the possibility of money laundering. The analysis is directed at formulating a role-based criminal liability construction and a supervision and law enforcement model for protecting Indonesia's digital space.

3. RESULTS AND DISCUSSION

3.1. The Criminal Law Regulations for Online Gambling Involving State Apparatus

Online gambling in Indonesian criminal law is a development of the crime of gambling which uses electronic means as a space for the act to take place.[19] These acts include activities that open up opportunities for gambling, provide digital resources, manage access, distribute gambling content, receive profits, and maintain the continuity of gambling sites through electronic systems.[20] The status of online gambling as a crime rests on the series of acts that enable gambling activities to operate, be accessible, and generate economic profit. The element of the criminal act (actus reus) is evident in the act of creating, managing, distributing, transmitting, or making accessible electronic gambling content, while the element

[19] Reni Purba et al., Criminal Offence of Online Gambling: An Indonesian Criminal Law Perspective, *LAW & PASS: International Journal of Law, Public Administration and Social Studies*, Vol.2, No.4 (2025), p.238-247, DOI:10.47353/lawpass.v2i4.56

[20] Billy Sachio and Saptanti Noor, Pertanggungjawaban Hukum Influencer Judi Online Terhadap Masyarakat Yang Rugi Ditinjau Dari Hukum Perdata, *Aliansi: Jurnal Hukum, Pendidikan Dan Sosial Humaniora Учредители: Asosiasi Seni Desain dan Komunikasi Visual Indonesia*, Vol.1, No.3 (2024), p.172-185, DOI: 10.62383/aliansi.v1i3.188

of malicious intent or the perpetrator's mental state (mens rea) is evident in the perpetrator's knowledge and will in consciously carrying out the act.[21]

Conceptually, online gambling can be placed in the definition of a criminal act as stated by Moeljatno, where a criminal act is an act that is prohibited by legal regulations, accompanied by the threat of criminal penalties for anyone who violates this prohibition.[22] This view provides the basis for understanding online gambling not only as the act of gambling, but also as a series of actions that create opportunities, provide facilities, manage access, disseminate gambling content, and keep gambling sites accessible to the public. Maintaining open access to sites is directly linked to the continuation of criminal activity, as the digital space becomes a meeting place for perpetrators, players, promoters, site managers, and the flow of gambling proceeds.[23]

The regulation of gambling in Law Number 1 of 2023 concerning the Criminal Code represents an update to the national criminal law framework for gambling crimes. Articles 426 and 427 of the National Criminal Code differentiate the roles of perpetrators in gambling crimes, from those who create opportunities for gambling, those who make gambling a livelihood, those who participate in gambling businesses, to those who use the opportunity to gamble.[24] This role differentiation provides the basis for analyzing criminal liability based on the position and contribution of each actor within the gambling network. State officials suspected of using their official access to maintain the operation of online gambling sites can be legally charged with creating opportunities, assisting, or participating in the continuation of criminal gambling.[25]

An explanation regarding the validity period of the National Criminal Code is necessary because online gambling cases in the Komdigi environment are within the transitional period of national criminal law. The National Criminal Code came into effect on January 2, 2026, so acts occurring before that date are still assessed based on the principles of the validity period of criminal law (lex temporis delicti) and the principle of legality. This clarification prevents the misuse of the National Criminal Code for events that occurred before its enactment. The National Criminal Code remains relevant as a basis for criminal law reform, particularly because Articles 426 and 427 differentiate the roles of gambling perpetrators, including principal perpetrators, participants, accomplices, and those who profit from gambling activities. This

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[21] Beben Bentara, Legal Responsibility for Perpetrators of Online Gambling Crimes, *Journal of World Science*, Vol.4, No.5 (2025), p.512-521, DOI:10.58344/jws.v4i5.1408

[22] Andin Dwi Safitri and Khalimatuz Zuhriyah, Pengertian Tindak Pidana dan Unsur-Unsur Tindak Pidana, *Jurnal Hukum dan Keadilan*, Vol.14, No.1, 2025, p.34-47, DOI:10.55499/judiciary.v14i1.310

[23] Septu Haudli Bakhtiar and Azizah Nur Adilah, Fenomena Judi Online: Faktor, Dampak, Pertanggungjawaban Hukum, *Innovative: Journal of Social Science Research*, Vol.4, No.3 (2024), p.1016-1026, DOI:10.31004/innovative.v4i3.10547

[24] Anastasia Manik et al., Tindak Pidana Perjudian Online Pascapenerapan KUHP Nasional, *Judge: Jurnal Hukum*, Vol.6, No.8 (2026), p.1569-1576, DOI:10.54209/judge.v6i08.2188

[25] Ernita Kudadiri, Andi Najemi, and Erwin, Pertanggungjawaban Pidana Bagi Pelaku Tindak Pidana Perjudian Online, *PAMPAS: Journal of Criminal Law*, Vol.4, No.1 (2023), p.1-15, DOI:10.22437/pampas.v4i1.24607

distinction is useful for assessing the position of state officials suspected of using their official access to maintain the operation of online gambling sites.[26]

The provisions in the National Criminal Code are related to general provisions regarding criminal participation and aiding and abetting. State officials who do not act as the main players or managers can still be held criminally liable if their actions are related to the commission of a crime. This relationship can arise from the use of official authority, granting access, directed inaction, receiving profits, or other actions that support the continued access of gambling sites. Criminal liability in these circumstances rests on the causal contribution between the official's actions and the continued operation of online gambling sites. Position is not positioned as a justification, but rather as a factor that strengthens the relationship between authority, actions, and the perpetrator's malicious intent.[27]

Online gambling is also regulated by Law Number 1 of 2024 concerning the Second Amendment to the Electronic Information and Transactions Law. Article 27 Paragraph (2) of the ITE Law prohibits anyone who intentionally and without authority distributes, transmits, or makes accessible electronic information and/or electronic documents containing gambling content. Article 45 Paragraph (3) of the ITE Law provides a maximum prison sentence of 10 years and/or a maximum fine of IDR 10,000,000,000.00 for such acts. This regulation broadens the scope of criminal penalties from land-based gambling to digital access-based gambling. Parties who maintain open access to gambling sites can be analyzed under the definition of the act of making accessible electronic gambling content (making accessible gambling content), especially if such actions are carried out consciously and are related to certain benefits.[28]

The ITE Law provides the basis for government authority in controlling digital content. Article 40 of the ITE Law positions the government as the party protecting the public interest from the misuse of electronic information and electronic transactions that disrupt public order. The government has the authority to prevent the dissemination and use of electronic information and/or electronic documents containing prohibited content, including terminating access to unlawful content. This authority makes blocking online gambling sites a government action that supports criminal law enforcement. Blocking acts as an initial barrier to prevent the

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[26] Haris Asmarantaka et al., Tinjauan Yuridis terhadap Tindak Pidana Perjudian Online pada Putusan No. 3/Pid.B/2025/PN Sdn, *Al-Zayn: Jurnal Ilmu Sosial & Hukum*, Vol.4, No.2 (2026), p.2966-2972, DOI:10.61104/alz.v4i2.4743

[27] Pratolo Saktiawan et al., Pembantuan dalam Hukum Pidana Indonesia: Analisis Pasal 56 KUHP dan UU No. 1 Tahun 2023, *Innovative: Journal of Social Science Research*, Vol.5, No.4 (2025), p.8257–8269, DOI:10.31004/innovative.v5i4.20843

[28] Kresna Satria Wibowo and Brahma Astagiri, Criminal Liability for Online Gambling Practices Based on Chapter 27 Paragraph (2) and Chapter 45 Paragraph (2) of Law Number 1 of 2024, *International Journal of Science and Environment*, Vol.6, No.1 (2026), p.320–327, DOI:10.51601/ijse.v6i1.339

continued circulation of gambling content, while criminal prosecution serves as a means to prosecute those who create, manage, tolerate, or profit from such content.[29]

The technical provisions for terminating access are also based on Government Regulation No. 71 of 2019 concerning the Implementation of Electronic Systems and Transactions and Regulation of the Minister of Communication and Information Technology No. 5 of 2020 concerning Private Electronic System Providers. Regulation No. 5 of 2020 stipulates the obligation of Private Electronic System Providers to terminate access (take down) to prohibited electronic information and/or electronic documents, including content that facilitates access to prohibited electronic information and/or electronic documents.[30] Requests for termination of access can be submitted by the public, ministries or institutions, law enforcement officials, and judicial institutions. For pornographic and/or gambling content, requests for termination of access can be submitted to the Minister, and the Minister can order Private Electronic System Providers to terminate access. These technical provisions demonstrate that blocking online gambling sites is a series of administrative authorities that have criminal legal value when such access is misused to protect certain sites.[31]

The authority to block websites falls within the purview of government officials, which must be exercised according to the principles of legality and the limits of legitimate authority. State officials who have access to the blocking system hold a different legal standing than the general public because their actions are related to official authority. Abuse of authority in blocking online gambling sites can transform the issue from a mere digital content violation into a criminal case related to official authority. Such actions can be assessed through the relationship between authority, the perpetrator's inner will, the actions taken, and the benefits received from the gambling site's continued existence. This relationship between official position and criminal action is what distinguishes cases involving state officials from those involving ordinary online gambling players, admins, or promoters.[32]

The position of state apparatus in digital space control is related to Law Number 20 of 2023 concerning the State Civil Apparatus. ASN employees consist of PNS and PPPK (Permanent Personnel Personnel) working in government agencies. The ASN Law regulates strengthening merit system oversight, determining the need for PNS and PPPK, structuring honorary staff,

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[29] Nisa Amalina Adlina, Efektivitas Penegakan Hukum Perjudian Online di Indonesia: Mengatasi Hambatan Regulasi dan Implementasi, *Journal of Contemporary Law Studies*, Vol.2, No.2 (2025), p.197-208, DOI 10.47134/lawstudies.v2i2.3670

[30] Tundjung Herning Sitabuana et al., Measuring The Effectiveness of Private Electronic System Organizers Regulations In Developing Social Media Equilibrium, *Law Reform*, Vol.19, No.2 (2023), p.344-371, DOI: 10.14710/lr.v19i2.56534

[31] Rinalvin Achmad Wiryawan, Hak Warga Masyarakat terhadap Kebijakan Pemutusan Akses Penyelenggara Sistem Elektronik Lingkup Privat yang Tidak Terdaftar, *Jurnal Hukum & Pembangunan*, Vol.53, No.4 (2023), p.681-704, DOI:10.21143/jhp.vol53.no4.1533

[32] Ekky Aji Prasetyo et al., Pertanggungjawaban Pidana dan Penerapan Mens Rea dalam Tindak Pidana Intersepsi di Indonesia, *Collegium Studiosum Journal*, Vol.7, No.1 (2024), p.373–385, DOI:10.56301/csj.v7i1.1491

and digitizing ASN management.[33] This position provides the basis for apparatus carrying out government functions to exercise their authority for the public interest. The abuse of authority in blocking online gambling sites demonstrates the link between violations of official obligations and criminal liability if the act fulfills the elements of a crime. The term "state apparatus" in this discussion encompasses any party connected to the exercise of government authority, whether through ASN status, employment relationships, assignments, or specific access to digital space control systems. This limitation prevents the analysis from stopping at employee status but rather leads to the relationship between position, access, authority, and criminal acts.[34]

The involvement of state officials in online gambling is not only related to violations of criminal law in the field of electronic information, but also has an intersection with criminal offenses.[35] Public authority used for purposes outside the interests of government can open up the possibility of abuse of power, particularly when such actions involve the acceptance of money, gifts, facilities, or advantages. Accepting benefits due to one's position can lead to the crime of bribery, gratification, or other crimes related to malfeasance.[36] This section shows that the involvement of officials in online gambling does not stop at violating the ITE Law, but can move towards criminal liability for using their position to support a gambling network.

Apart from being related to criminal acts of office, online gambling involving state officials also has a close relationship with the crime of money laundering.[37] Online gambling generates economic profits that can be diverted, disguised, stored, or used through bank accounts, e-wallets, QRIS, and other payment methods. The National Criminal Code regulates money laundering in Articles 607 and 608, so that proceeds from electronic gambling crimes can be analyzed through the act of placing, transferring, diverting, spending, hiding, or disguising the origin of assets known or reasonably suspected to originate from criminal acts. Law Number 8 of 2010 remains the basis for preventing and eradicating money laundering, particularly in tracing financial transactions, reporting suspicious transactions, the role of the Financial Transaction Reports and Analysis Center (PPATK), and the repatriation of assets derived from criminal acts. Electronic gambling can be classified as a predicate crime if the profits are

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[33] Jawade Hafidz, Agus Prasetia Wiranto, and Resa Ayuning Maharanti, The Law No. 20 of 2023: Reform or Retreat? A Critical Analysis of Its Impact on The State Civil Apparatus (ASN) Personnel System in Indonesia, *Jurnal Daulat Hukum*, Vol.8, No.4 (2025), p. 1015-1033, DOI:10.30659/jdh.v8i4.50770

[34] Asfarina Amanda Putri et al., Transformasi Manajemen Sumber Daya Manusia ASN melalui Implementasi Reformasi Birokrasi di Indonesia, *Indonesia Economic Journal*, Vol.1, No.2 (2025), p.1631-1642., DOI:10.63822/0ckt4a65

[35] Made Ayu Adi Pradnyaningrat et al., Pertanggungjawaban Pidana terhadap Pelaku Penyalahgunaan Wewenang Tindak Pidana Korupsi, *Al-Zayn: Jurnal Ilmu Sosial & Hukum*, Vol.4, No.3 (2026), p.249–257, DOI:10.61104/alz.v4i3.5260

[36] Sindi Audia, Makna Penyalahgunaan Kewenangan dalam Perkara Tindak Pidana Korupsi, *Journal of Anti-Corruption*, Vol.1, No.1 (2025), p.36–51, DOI:10.30872/action.v1i1.1665

[37] Alda Satrya et al., Tindak Pidana Pencucian Uang terhadap Perjudian Online, *Al-Manhaj: Jurnal Hukum dan Pranata Sosial Islam*, Vol.4, No.2 (2022), p.287–296, DOI:10.37680/almanhaj.v4i2.1863

processed through financial transactions to disguise the source of the funds, including when the flow of funds is related to parties who have access to the online gambling site blocking system.[38]

The criminal law regulations regarding online gambling involving state officials demonstrate the interconnectedness of general criminal norms, electronic criminal norms, state apparatus law, the authority to terminate access, official crimes, and money laundering provisions. The National Criminal Code provides the basis for the distinction between the roles of gambling perpetrators, participation, assistance, and money laundering. The ITE Law provides the basis for the prohibition of electronic gambling content, criminal penalties, and the authority to terminate access. Government Regulation No. 71 of 2019 and Ministerial Regulation No. 5 of 2020 provide the technical basis for terminating access to prohibited electronic information. The Civil Servant Law provides the basis for the obligations of state officials in exercising government authority. The Money Laundering Law provides a way to trace the proceeds of crime. The interconnectedness of these regulations demonstrates that state officials who abuse their authority to block online gambling sites can be held accountable through the construction of criminal acts, malicious intent (mens rea), participation, assistance, abuse of authority, and receipt of profits from online gambling activities.

3.2. Criminal Responsibility of State Apparatus in Abusing the Authority to Block Online Gambling Sites

The criminal liability of state officials for misusing their authority to block online gambling sites can be explained through the theory of criminal liability, which requires the existence of a prohibited act, fault, capacity to be responsible, and the absence of justification or excuse. The prohibited act appears when official access is used to maintain, delay, remove, or protect access to online gambling sites. Fault is shown through intent or negligence that can be proven from knowledge of the gambling content, repeated access patterns, communication with site managers, receipt of benefits, or actions outside official procedures. The position of the state apparatus does not automatically create criminal liability, but it becomes legally relevant when the authority attached to that position is used as an instrument to support the continuation of online gambling crimes.[39]

According to Roeslan Saleh, criminal responsibility is related to the transfer of objective blame for a criminal act to the perpetrator due to his/her fault.[40] A person must not only be proven to

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[38] Martina, Penerapan Hukum terhadap Dugaan Fasilitasi Transaksi Judi Online oleh PT Espay Debit Indonesia Koe (DANA), *Presidensial: Jurnal Hukum, Administrasi Negara, dan Kebijakan Publik*, Vol.2, No.4 (2025), p.37–51, DOI:10.62383/presidensial.v2i4.1296

[39] Sherly Bantu et al., Criminal Liability of Online Gambling Perpetrators In Indonesia According To The Electronic Information And Transactions Law, *Jurnal Impresi Indonesia*, Vol.3, No.9 (2024), p.743-757, DOI:10.58344/jii.v3i9.5414

[40] Aris Munandar et al., Peran Niat (Mens rea) dalam Pertanggungjawaban Pidana di Indonesia, *Jimmi: Jurnal Ilmiah Mahasiswa Multidisiplin*, Vol.1, No.3 (2024), p.240-252, DOI:10.71153/jimmi.v1i3.140

have committed a prohibited act, but must also be legally blameworthy because the act was committed with awareness, will, or negligence that can be accounted for. In line with this, Moeljatno distinguishes between criminal acts and criminal liability, because a person can only be punished if, in addition to committing a prohibited act, there is also an element of fault inherent in that person. This perspective is important in analyzing state apparatus, because criminal liability does not arise solely from the position held, but also from the abuse of authority carried out with a certain mental attitude and resulting in the protection of online gambling networks.

The concept of criminal liability in criminal law rests on the existence of a criminal act and the fault of the perpetrator. A criminal act represents an outward action prohibited by law, while fault represents the inner attitude that accompanies the act. State officials can be held criminally liable if the use of their official access is related to the continued access of online gambling sites. This relationship can arise from adding a site to a safe list, removing a site from a blocked list, delaying access termination, providing information to site administrators, or connecting site administrators with parties with access to digital content control systems. These actions demonstrate that the criminal liability of state officials is not solely determined by their employment status, but also by their actual contribution to the perpetuation of the crime. State officials can be held criminally liable if they are proven to possess the capacity to be responsible, to have committed the act intentionally or negligently, and to be unable to justify or excuse themselves.[41]

The authority to block online gambling sites is a government authority with legal objectives. This authority is granted to cut off public access to electronic gambling content, as prohibited by the Electronic Information and Transactions Law. Officials within the blocking system are obligated to carry out this function in accordance with the principles of legality, public interest, and legitimate limits of authority. This authority becomes a criminal matter when it is used for the benefit of a gambling network, especially if the use of such authority is deliberate, repeated, and related to the receipt of benefits.[42] At this point the position is no longer just an administrative background, but rather part of how the crime works.

International regulations show that blocking online gambling is generally not treated only as an administrative measure, but as part of a broader enforcement system. Singapore regulates online gambling control through access blocking orders and payment blocking orders, so illegal gambling services can be cut off from both website access and financial channels.[43] Australia also applies blocking against illegal gambling sites through the Australian Communications and

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[41] Shulhan Iqbal Nasution, Mens Rea: Fondasi Pertanggungjawaban Pidana Dalam Sistem Peradilan Pidana Di Indonesia, *Iqtishaduna: Jurnal Ilmiah Mahasiswa Hukum Ekonomi Syari'ah*, Vol.7, No.1 (2025), p.790-804, DOI: 10.24252/iqtishaduna.v7i1.61542

[42] Dhema Oktakirana, Penyalahgunaan Kewenangan yang Dilakukan oleh Pejabat, *PESHUM: Jurnal Pendidikan, Sosial dan Humaniora*, Vol.4, No.6 (2025), p.8807–8815, DOI:10.56799/peshum.v4i6.11859

[43] Rattaphong Sonsuphap, Governance and Strategies of Gambling Business in Southeast Asia, *Corporate and Business Strategy Review*, Vol.3, No.2 (2022), p.55-64, DOI:10.22495/cbsrv3i2art5

Media Authority, supported by public complaints, regulatory investigations, and a list of blocked illegal gambling services. These comparative models[44] show that the abuse of blocking authority by state apparatus must be assessed not only from the aspect of administrative misconduct, but also from criminal liability when the abuse of access helps gambling sites remain accessible, protects the flow of profit, or prevents law enforcement from reaching the real perpetrators.[45]

The online gambling case in the Komdigi area illustrates the relationship between electronic gambling crimes, blocked access, and profit flows. The case demonstrates the division of roles between site managers, online gambling site searchers, site list collectors, depositors, parties connected to blocked access, and parties suspected of money laundering. This sequence of roles demonstrates that online gambling operates through a network that relies on digital access, relationships between actors, and the flow of funds. The South Jakarta District Court sentenced MN and HE to 4 years and 8 months each in a case involving the management of an online gambling site agent within the Ministry of Communication and Information Technology (Kominfo). DA was also sentenced to 4 years in prison for money laundering related to the management of an online gambling site within the Komdigi area. This case provides the basis for the analysis that criminal responsibility should not only be directed at site owners but also at those who maintain the site's existence in the digital space.

The elements of a criminal act (actus reus) by state officials can be found in actions directly related to access to blocked sites. These actions can include allowing the site to remain active, hindering the process of terminating access, removing the site from the block list, providing internal information to site administrators, or protecting certain sites so that they remain accessible to the public. These actions have criminal value when related to the formulation of "making accessible" electronic information and/or electronic documents containing gambling. Article 27 Paragraph (2) of Law Number 1 of 2024 places the act of making accessible gambling content as part of an electronic crime, while Article 45 Paragraph (3) regulates the criminal threats for such actions. Officials who use official access to keep gambling sites open can be placed in the construction of actions that support the availability of electronic gambling content to the public.[46]

The element of malicious intent (mens rea) in this case is assessed based on the perpetrator's knowledge and will. Knowledge is evident when officials know that a particular site contains gambling content and understand that their inherent authority will be used to block access to it. Intent is evident when officials continue to take actions that prevent the site from being

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[44] Chuasanga A., Ong Argo Victoria. Legal Principles Under Criminal Law in Indonesia and Thailand, *Jurnal Daulat Hukum*, Vol.2, No.1 (2019), p.131-138, DOI: https://dx.doi.org/10.30659/jdh.v2i1.4218

[45] Michael Egerer and Virve Marionneau, Blocking Measures against Offshore Online Gambling: A Scoping Review, *International Gambling Studies*, Vol.24, No.1 (2024), p.36-52, DOI:10.1080/14459795.2023.2190372

[46] Andi Tanwir Mappanyukki et al., Tinjauan Yuridis Penjatuhan Sanksi Pada Tindak Pidana Perjudian Online Pada Putusan Nomor 240/Pid. Sus/2024/PN Sgm, *Indonesian Journal of Intellectual Publication*, Vol.5, No.2 (2025), p.162-169, DOI:10.51577/ijipublication.v5i2.705

blocked, continue operating, or are protected from access being blocked. Evidence of communication, repeated patterns of action, system access records, relationships with site administrators, and the receipt of money or facilities can be used to assess intent. Official misconduct in this case ranges from procedural violations to the deliberate use of government authority to support the continuation of the crime.[47]

Abuse of power is a distinguishing element in the criminal liability of state officials. Abuse of power occurs when public authority is used for purposes contrary to the intent for which the authority was granted. The authority to block sites is granted to block access to gambling content, so using that authority to protect specific sites represents a deviation from the purpose of the position. Officials who use their positions to keep online gambling sites accessible use state authority as a tool to support digital crime. The relationship between authority, position, and criminal acts makes the actions of officials have a different legal weight than those of ordinary perpetrators.[48]

The relationship between position and crime forms the basis for assessing the level of criminal responsibility. Position grants access to systems, data, site lists, access termination mechanisms, and internal communication channels. Without such access, it is difficult for outsiders to influence the status of a site's blocking. Officials who use their official access to keep gambling sites operating serve as a liaison between state authorities and the interests of the gambling network. This relationship strengthens the evidence that the crime occurred through abuse of authority, not through personal actions independent of their position. Position in this situation serves as a means for the crime to proceed more smoothly, last longer, and be more difficult to detect by conventional blocking.[49]

Criminal liability of state officials can be established through acts of participation and aiding and abetting. Officials do not have to be the site owner or primary administrator to be held accountable. Their actions can be classified as participation or abetting if they contribute to the perpetuation of electronic gambling crimes. This contribution can take the form of providing access, providing inside information, protecting certain sites, managing site lists, directing access, or other actions that facilitate the continued access of gambling sites. Causal contribution is the basis for linking the actions of officials to the perpetuation of the crime.[50]

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[47] Adrianus Herman Henok, Konstruksi Motif dalam Pembuktian Perkara Pidana, *Honeste Vivere*, Vol.33, No.2 (2023), p.113–129, DOI:10.55809/hv.v33i2.242

[48] Sobirin Malian, Penyalahgunaan Wewenang Jabatan Oleh Pejabat Negara/Pemerintah: Perspektif Hukum Administrasi Negara Dan Hukum Pidana, *Jurnal Hukum Respublica*, Vol.20, No.1 (2020), p.102-121, DOI:10.31849/respublica.v20i1.5363

[49] Diwa Putra Fachri Hamzah, Efektifitas Undang-Undang Pemberantasan Tindak Pidana Korupsi terhadap Tindak Pidana Suap Menyuap oleh Pejabat Negara, *Maleo Law Journal*, Vol.8, No.1 (2024), p.78–91, DOI:10.56338/mlj.v8i1.4383

[50] Reisa Arrifa and Ade Adhari, Pembuktian Pemenuhan Unsur Kesengajaan Pembantuan Tindak Pidana pada Putusan Pengadilan Negeri Medan Nomor 882/Pid.B/2024/PN Mdn, *Indonesian Journal of Law and Economics Review*, Vol.21, No.1 (2026), p.1-10, DOI:10.21070/ijler.v21i1.1409

The relationship between officials and online gambling networks can be traced through the flow of money, facilities, or other benefits received through the protection of certain sites. Anything received through the protection of a site can reveal the motive, the perpetrator's relationship, and the direction of the action. Receiving benefits can reveal links to official crimes, especially if the benefits are granted because of the authority inherent in officials. Online gambling cases can overlap with bribery, gratuities, or other crimes related to abuse of office. The relationship between the provision of benefits and the authority to block them demonstrates that criminal acts arise not only from gambling activities but also from the exchange of benefits for the use of office.

The flow of funds in online gambling cases can lead to money laundering. Electronic gambling generates profits that can be transferred, stored, spent, or disguised through bank accounts, e-wallets, QRIS, or other payment methods. Online gambling can be classified as a predicate crime when the proceeds are processed through financial transactions to disguise the source of the funds.[51] Officials who receive, store, transfer, or use profits from protected sites can be linked to money laundering if they disguise or conceal the origin of the assets. This connection requires law enforcement in online gambling cases to trace not only the blocking action but also the trail of funds moving after the site receives protection.[52]

Proving the criminal liability of state officials for abusing their authority to block online gambling sites requires a clear link between their position, actions, malicious intent, and profit. System access history can reveal who opened, changed, suspended, or removed a site's blocking status. Internal documents reveal the limits of official authority and the proper procedures for terminating access. Financial transactions can indicate the receipt of benefits or the concealment of proceeds of crime. Witness testimony and digital forensic experts can explain how the system works, the electronic footprint, access patterns, and the relationship between the officials' actions and the continued operation of online gambling sites.[53]

Proving malicious intent (mens rea) in digital cases does not always depend on the perpetrator's confession. Intent can be inferred from a series of circumstances demonstrating knowledge, will, and a pattern of action. Repeatedly unblocked sites, lists of excluded sites, communications with site administrators, receipt of money, and use of access outside of established procedures can all form a picture of intent. Repeated, covert, and economic-benefit actions by officials provide a basis for assessing that the actions were committed with

[51] Reza Yolawtry Simalango et al., Tindak Pidana Pencucian Uang dalam Perjudian Online: Tantangan Hukum dan Penegakan di Era Digital, *Jurnal Pendidikan Tambusai*, Vol.9, No.1 (2025), p.7038–7042, DOI:10.31004/jptam.v9i1.25435

[52] Murshal Senjaya, Law Enforcement of the Crime of Money Laundering That Comes from Online Gambling, *International Journal of Social Science*, Vol.2, No.3 (2022), p.1641–1650, DOI:10.53625/ijss.v2i3.3626

[53] Aris Hardinanto et al., The Significance of Computer Forensics in Electronic Documents as Evidence in Criminal Law, *Jurnal Cakrawala Hukum*, Vol.14, No.2 (2023), p.155–166, DOI:10.26905/idjch.v14i2.10820

knowledge and will. This type of evidence allows law enforcement to construct a criminal liability structure through a series of mutually reinforcing facts.[54]

Determining criminal liability needs to be tailored to each perpetrator's role in the chain of actions. Those who grant access, manage the site list, receive deposits, connect site managers with internal parties, or prevent access from being terminated have varying degrees of responsibility. These differences in role determine the form of culpability, the status of involvement, the type of relevant crime, and the direction of punishment. Officials who merely know but do not take action are in a different position than those who actively provide protection, receive benefits, and control the site list. This role-based analysis ensures that criminal liability is assigned to those actors who have a concrete connection to the crime.[55]

The criminal liability of state officials for misusing their authority to block online gambling sites is established through the relationship between official authority, criminal acts, malicious intent, participation, receipt of profits, and the flow of gambling proceeds. The Komdigi case demonstrates that online gambling can operate through parties close to state authorities, so criminal law enforcement is directed at anyone who maintains the continuity of gambling sites, including officials who use blocking authority for unlawful purposes. This construction confirms that government positions carry criminal liability when public authority is used to support digital crimes based on economic gain.

3.3. Model for Strengthening Supervision and Enforcement of Criminal Law against Apparatus in Controlling Digital Space

The model for strengthening oversight and criminal law enforcement against officials in controlling digital space rests on securing authority, monitoring access, electronic evidence, and tracing the flow of funds. The online gambling case in Komdigi demonstrates that site blocking can be a vulnerable point when officials or parties connected to the digital content control system use their access for unlawful purposes. The authority that should act as a fence in digital space can become a gateway for gambling sites if it is not accompanied by sound governance, multi-layered oversight, and auditable digital records.[56] This strengthening model is directed at three main things, namely securing blocking access, law enforcement based on the role of the perpetrator, and tracing profits from online gambling.

[54] Dewa Gede Giri Santosa and Karell Mawla Ibnu Kamali, Acquisition and Presentation of Digital Evidence in Criminal Trial in Indonesia, *Jurnal Hukum dan Peradilan*, Vol.11, No.2 (2022), p.195–218, DOI:10.25216/jhp.11.2.2022.195-218

[55] Wahyu Dwi Oktafianto, Pertanggungjawaban Pidana Pelaku Turut Serta Dalam Tindak Pidana Korupsi Penerimaan Suap Oleh Hakim, *CENDEKIA: Jurnal Penelitian dan Pengkajian Ilmiah*, Vol.2, No.2 (2025), p.274-286, DOI:10.62335/cendekia.v2i2.967

[56] Nur Aminudin et al., A User-Driven E-Audit System for Improving Transparency and Efficiency in Regional Government Supervision, *Jurnal Teknik Informatika (JUTIF)*, Vol.6, No.4 (2025), p.2348–2366, DOI:10.52436/1.jutif.2025.6.4.5145

The first strengthening lies in the governance of site blocking authority. Terminating access to online gambling sites must be implemented through a clear division of duties between the parties who propose, review, approve, and implement the blocking.[57] Any action to block, delay, change a site's status, or delist it requires a valid order, legal justification, a responsible official, and administrative records. This division of roles provides clear boundaries for officials to prevent authority from being concentrated in one hand without multiple checks. The ITE Law provides the government with the authority to prevent the dissemination and use of electronic information or electronic documents containing prohibited content, including the authority to order the termination of access to unlawful content.

Oversight of the blocking system needs to be strengthened through role-based access control, digital logs, and audit trails. Any official who opens, changes, suspends, or deletes a site's blocked status must be recorded in an auditable system. This digital trail serves as an internal oversight tool and as evidence in the event of any alleged abuse of authority. The technical provisions for terminating access in Ministerial Regulation No. 5 of 2020 concerning Private Electronic System Providers indicate that requests to terminate access to electronic information or electronic documents containing gambling content can be submitted through a specific mechanism, and the Minister can order Private Electronic System Providers to terminate access.[58]

Regular checks on online gambling site lists should be conducted to prevent abuse within the blocking system. Lists of blocked sites, sites that failed to block, sites that changed domains, and sites exempted from blocking should be reviewed regularly to identify suspicious patterns early. Sites that repeatedly escape blocking, are late in their access cuts, or change status without legal justification could be signs of negligence.[59] These inspections are accompanied by easily traceable documentation so that every change in site status has both an administrative and digital footprint. Regular monitoring of the site list can reduce the dark spaces within the blocking system that are vulnerable to exploitation by those with internal access.

Oversight of officials holding blocking access is directed at strengthening job integrity and digital compliance. Officials working in the field of digital content control have strategic access because they can determine whether a site remains accessible to the public or has its access cut off. Internal oversight can be conducted through integrity checks, job rotations, conflict of interest checks, evaluations of direct superiors, examinations of asset reports, and restrictions on relationships with external parties related to the site's administrators. These mechanisms

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[57] Firza Prima Aditiawan et al., Implementasi Otomasi Proses Seleksi Inovasi Daerah Berbasis Web: Studi Kasus Kabupaten Pasuruan, *SINTA Journal: Science, Technology and Agriculture Journal*, Vol.6, No.2 (2025), p.373–386, DOI:10.37638/sinta.6.2.373-386

[58] Putranta Aswintama, Implementation of Role-Based Access Control, Multi Tenancy and Audit Logging in a Single Sign-On System, *Jurnal Mandiri IT*, Vol.14, No.1 (2025), p.119–128, DOI:10.35335/mandiri.v14i1.441

[59] Michael Egerer and Virve Marionneau, Blocking Measures against Offshore Online Gambling: A Scoping Review, *International Gambling Studies*, Vol.24, No.1 (2024), p.36-52, DOI:10.1080/14459795.2023.2190372

are important because abuse of authority often arises from the intersection of job access, hidden opportunities, and profit streams.[60]

Online gambling controls should be directed not only at cutting off access but also at cutting off transaction flows. Singapore can serve as a reference, as the Gambling Control Act 2022 regulates access blocking orders to block access to illegal remote gambling services and payment blocking orders to block payment transactions related to illegal gambling.[61] This model demonstrates that online gambling control is implemented through two channels simultaneously: cutting off access to the site and cutting off the financial flow that supports the site. This model is relevant for Indonesia because online gambling concerns not only the site's continued operation but also the flow of funds through bank accounts, e-wallets, QRIS, and other payment methods.

Online gambling oversight can also be strengthened through open blocklists, public complaints, and regulatory investigations. Australia can serve as a benchmark because online gambling oversight is carried out through the Australian Communications and Media Authority (ACMA), the communications regulator. The ACMA maintains a list of blocked illegal gambling sites, receives public complaints, and requests that internet service providers block sites that violate the law. According to ACMA records, since the first blocking request in November 2019, 1,564 illegal gambling sites and affiliated sites have been blocked, and more than 225 illegal services have exited the Australian market since new regulations were implemented in 2017. The Australian pattern demonstrates that open blocklists, public complaints, and regulatory investigations can strengthen oversight of sites that change domains or reappear in new forms.[62]

Indonesia can strengthen its control of online gambling by combining access control, transaction control, public complaints, and law enforcement. Singapore provides an example of strengthening transaction control through orders to financial institutions and payment providers, while Australia offers an example of open site listings, public complaints, and blocking based on regulatory investigations. Combining these two approaches can be achieved through collaboration between Komdigi, PPATK, OJK, Bank Indonesia, payment service providers, the National Police, the Attorney General's Office, and the courts. Komdigi plays a role in access control, PPATK investigates suspicious transactions, OJK and Bank Indonesia monitor financial channels, payment service providers terminate accounts or instruments used,

[60] Asep Muhyidin et al., An Effective Whistleblowing System Model for Regional Inspectorates: A Qualitative Study in Fraud Prevention, *Journal of Accounting Auditing and Business*, Vol.8, No.2 (2025), p.20-36, DOI:10.24198/jaab.v8i2.65078

[61] Adi Fahrudin et al., Online gambling addiction: Problems and Solutions for Policymakers and Stakeholders in Indonesia, *Journal of Infrastructure, Policy and Development*, Vol.8, No.11 (2024), p.1-17, DOI: 10.24294/jipd.v8i11.9077

[62] Johanna Järvinen-Tassopoulos, Virve Marionneau, and Michael Egerer, Strengthening channeling policy: the Finnish approach to protecting domestic online gambling market, *Frontiers in sociology*, Vol.8, (2024), p.1-10, DOI:10.3389/fsoc.2023.1272735

and law enforcement takes action against those who manage, protect, or profit from online gambling.

Follow the money tracking is central to law enforcement efforts against officials involved in protecting online gambling sites. Money flows can reveal the connections between site managers, intermediaries, officials holding access, and those disguising the proceeds of crime. Transactions through bank accounts, e-wallets, QRIS, digital assets, or holding accounts can reveal patterns of profit receipt. Fund tracking opens the door to money laundering if gambling proceeds are transferred, stored, used, or disguised. This approach allows law enforcement to address the economic proceeds of the crime, not just site blocking. Electronic evidence is a key element in cases involving abuse of authority to block sites.

Electronic evidence in the form of system access histories, metadata, electronic communications, lists of website status changes, and financial transactions needs to be secured from the outset. Digital forensic examination is necessary to read access traces, data change times, devices used, and relationships between accounts. Maintaining the chain of custody of evidence is necessary to ensure that electronic evidence remains valid and accountable during investigations, prosecutions, and court hearings. A well-organized digital footprint will facilitate the proof of the relationship between official authority, criminal acts, malicious intent, and the receipt of profits.[63]

Criminal penalties for officials who abuse their authority to block online gambling sites are directed at principal penalties, additional penalties, and administrative measures. Principal penalties can be imposed based on the proven crime, including electronic gambling, involvement, assistance, official crimes, and money laundering. Additional penalties can be directed at confiscation of the proceeds of crime and revocation of certain rights, particularly the right to hold public office related to the control of digital systems. Administrative measures can include dismissal, demotion, access restrictions, or prohibitions from managing digital government systems. Such penalties place office as a legal mandate that has serious consequences when used to protect crime. The first pillar is securing access to blocked sites through authority restrictions, digital logs, audit trails, and regular site checks. The second pillar is role-based law enforcement, so that penalties are directed at site managers, intermediaries, fund collectors, officials holding access, and parties disguising the proceeds of crime according to their contributions. The third pillar is tracing the flow of funds to identify gambling profits and assess the possibility of money laundering. This model places control of digital space as an area of state authority that must be maintained through official supervision, electronic evidence, and strict criminal accountability.

[63] Vanessa and Hery Firmansyah, Analysis of the Validity of Electronic Evidence in Criminal Trial Proceedings and the Implementation of Its Admissibility (Judgment Study): Analisis Keabsahan Bukti Elektronik dalam Pemeriksaan Persidangan Perkara Pidana dan Implementasi Admisibilitasnya (Studi Putusan), *Indonesian Journal of Law and Economics Review,* Vol.20, No.4 (2025), p.1-10, DOI: 10.21070/ijler.v20i4.1395

The novelty of this study lies in its specific construction of criminal liability for state officials who abuse online gambling site-blocking authority, a perspective that has not been comprehensively addressed in previous studies that mostly focus on online gambling perpetrators, content creators, administrative authority, or bureaucratic ethics. This study develops a new legal analysis by linking public authority, digital access control, mens rea, participation, assistance, receipt of benefits, and money laundering within one integrated framework of criminal liability. It also formulates a role-based supervision and enforcement model that combines access control, audit trails, digital records, electronic evidence, periodic site verification, and follow-the-money investigation, so that law enforcement does not only target players, operators, promoters, or site managers, but also reaches officials who use public authority to protect online gambling networks and weaken the integrity of Indonesia's digital space control.

4. CONCLUSION

Online gambling involving state officials must be understood not merely as an electronic gambling offense, but as a form of criminal liability arising from the misuse of public authority in digital space control. The findings show that Indonesian criminal law provides a basis for prosecuting such conduct through the National Criminal Code, the ITE Law, the State Civil Apparatus Law, regulations on electronic system implementation and private electronic system providers, and the Money Laundering Law. State officials may be held criminally liable when their authority to block online gambling sites is abused through intentional acts, participation, assistance, receipt of benefits, contribution to the continued accessibility of gambling sites, or concealment of gambling proceeds. Therefore, the purpose of this study is answered by constructing a role-based model of criminal liability and enforcement that combines access-based supervision, audit trails, digital records, electronic evidence, periodic site verification, and follow-the-money investigation to ensure that law enforcement reaches not only players, operators, promoters, and site administrators, but also officials who use state authority to protect online gambling networks and weaken the integrity of Indonesia's digital space control.

BIBLIOGRAPHY

Journals:

Adi Fahrudin et al., Online gambling addiction: Problems and Solutions for Policymakers and Stakeholders in Indonesia, *Journal of Infrastructure, Policy and Development*, Vol.8, No.11 (2024), DOI: 10.24294/jipd.v8i11.9077

Adrianus Herman Henok. Konstruksi Motif dalam Pembuktian Perkara Pidana, *Honeste Vivere*, Vol.33, No.2 (2023), DOI:10.55809/hv.v33i2.242

Alda Satrya et al., Tindak Pidana Pencucian Uang terhadap Perjudian Online, *Al-Manhaj: Jurnal Hukum dan Pranata Sosial Islam*, Vol.4, No.2 (2022), DOI:10.37680/almanhaj.v4i2.1863

Anastasia Manik et al., Tindak Pidana Perjudian Online Pascapenerapan KUHP Nasional, *Judge: Jurnal Hukum*, Vol.6, No.8 (2026), DOI:10.54209/judge.v6i08.2188

Andi Tanwir Mappanyukki et al., Tinjauan Yuridis Penjatuhan Sanksi Pada Tindak Pidana Perjudian Online Pada Putusan Nomor 240/Pid. Sus/2024/PN Sgm, *Indonesian Journal of Intellectual Publication*, Vol.5, No.2 (2025), DOI:10.51577/ijipublication.v5i2.705

Andin Dwi Safitri and Khalimatuz Zuhriyah, Pengertian Tindak Pidana dan Unsur-Unsur Tindak Pidana, *Jurnal Hukum dan Keadilan*, Vol.14, No.1 (2025), DOI:10.55499/judiciary.v14i1.310

Andri Winjaya Laksana, CYBERCRIME COMPARISON UNDER CRIMINAL LAW IN SOME COUNTRIES, *Jurnal Pembaharuan Hukum*, Vol.V, No.2 (April-Agustus 2018), page.217-226 DOI: https://dx.doi.org/10.26532/jph.v5i2.3008

Aris Hardinanto et al., The Significance of Computer Forensics in Electronic Documents as Evidence in Criminal Law, *Jurnal Cakrawala Hukum*, Vol.14, No.2 (2023), DOI:10.26905/idjch.v14i2.10820

Aris Munandar et al., Peran Niat (Mens rea) dalam Pertanggungjawaban Pidana di Indonesia, *Jimmi: Jurnal Ilmiah Mahasiswa Multidisiplin*, Vol.1, No.3 (2024), DOI:10.71153/jimmi.v1i3.140

Arnaz Maulana et al., Otoritas Kementerian Komunikasi dan Digitalisasi dalam Pemblokiran Aplikasi dan Situs Judi Daring Menurut Undang-Undang ITE, *Al-Zayn: Jurnal Ilmu Sosial & Hukum*, Vol.4, No.2 (2026), DOI:10.61104/alz.v4i2.4244

Asep Muhyidin et al., An Effective Whistleblowing System Model for Regional Inspectorates: A Qualitative Study in Fraud Prevention, *Journal of Accounting Auditing and Business*, Vol.8, No.2 (2025), DOI:10.24198/jaab.v8i2.65078

Asfarina Amanda Putri et al., Transformasi Manajemen Sumber Daya Manusia ASN melalui Implementasi Reformasi Birokrasi di Indonesia, *Indonesia Economic Journal*, Vol.1, No.2 (2025), DOI:10.63822/0ckt4a65

Beben Bentara, Legal Responsibility for Perpetrators of Online Gambling Crimes, *Journal of World Science*, Vol.4, No.5 (2025), DOI:10.58344/jws.v4i5.1408

Billy Sachio and Saptanti Noor, Pertanggungjawaban Hukum Influencer Judi Online Terhadap Masyarakat Yang Rugi Ditinjau Dari Hukum Perdata, *Aliansi: Jurnal Hukum, Pendidikan Dan Sosial Humaniora*, Vol.1, No.3 (2024), DOI: 10.62383/aliansi.v1i3.188

Chuasanga A., Ong Argo Victoria. Legal Principles Under Criminal Law in Indonesia and Thailand, *Jurnal Daulat Hukum*, Vol.2, No.1 (2019), p.131-138, DOI: https://dx.doi.org/10.30659/jdh.v2i1.4218

Dewa Gede Giri Santosa and Karell Mawla Ibnu Kamali, Acquisition and Presentation of Digital Evidence in Criminal Trial in Indonesia, *Jurnal Hukum dan Peradilan*, Vol.11, No.2 (2022), DOI:10.25216/jhp.11.2.2022.195-218

Dhema Oktakirana, Penyalahgunaan Kewenangan yang Dilakukan oleh Pejabat, *PESHUM: Jurnal Pendidikan, Sosial dan Humaniora*, Vol.4, No.6 (2025), DOI:10.56799/peshum.v4i6.11859

Diwa Putra Fachri Hamzah, Efektifitas Undang-Undang Pemberantasan Tindak Pidana Korupsi terhadap Tindak Pidana Suap Menyuap oleh Pejabat Negara, *Maleo Law Journal*, Vol.8, No.1 (2024), DOI:10.56338/mlj.v8i1.4383

Ekky Aji Prasetyo et al., Pertanggungjawaban Pidana dan Penerapan Mens Rea dalam Tindak Pidana Intersepsi di Indonesia, *Collegium Studiosum Journal*, Vol.7, No.1 (2024), DOI:10.56301/csj.v7i1.1491

Ernita Kudadiri, Andi Najemi, and Erwin, Pertanggungjawaban Pidana Bagi Pelaku Tindak Pidana Perjudian Online, *PAMPAS: Journal of Criminal Law*, Vol.4, No.1 (2023), DOI:10.22437/pampas.v4i1.24607

Firza Prima Aditiawan et al., Implementasi Otomasi Proses Seleksi Inovasi Daerah Berbasis Web: Studi Kasus Kabupaten Pasuruan, *SINTA Journal: Science, Technology and Agriculture Journal*, Vol.6, No.2 (2025), DOI:10.37638/sinta.6.2.373-386

Haris Asmarantaka et al., Tinjauan Yuridis terhadap Tindak Pidana Perjudian Online pada Putusan No. 3/Pid.B/2025/PN Sdn, *Al-Zayn: Jurnal Ilmu Sosial & Hukum*, Vol.4, No.2 2026, DOI:10.61104/alz.v4i2.4743

Ignasius Yosanda Nono, Anak Agung Sagung Laksmi Dewi, and I. Putu Gede Seputra, Penegakan Hukum Terhadap Selebgram Yang Mempromosikan Situs Judi Online, *Jurnal Analogi Hukum*, Vol.3, No.2 (2021), DOI: 10.22225/ah.3.2.2021.235-239

Immanuel Maykael Martono Reinhard Hutagaol et al., Tanggung Jawab Hukum Perusahaan Penyedia Jasa Pembayaran (PJP) terhadap Penyalahgunaan Kanal Pembayaran untuk Transaksi Ilegal, *Corpus Juris: Jurnal Ilmu Hukum*, Vol.2, No.1 (2026), DOI:10.62335/corpusjuris.v2i1.2433

Jamilah et al., Negara Hukum dan Hak Asasi Manusia di Indonesia, *AKSIOMA: Jurnal Sains Ekonomi dan Edukasi*, Vol.2, No.5 (2025), DOI:10.62335/aksioma.v2i5.1198

Jawade Hafidz, Agus Prasetia Wiranto, and Resa Ayuning Maharanti, The Law No. 20 of 2023: Reform or Retreat? A Critical Analysis of Its Impact on The State Civil Apparatus (ASN) Personnel System in Indonesia, *Jurnal Daulat Hukum*, Vol.8, No.4 (2025), DOI:10.30659/jdh.v8i4.50770

Johanna Järvinen-Tassopoulos, Virve Marionneau, and Michael Egerer, Strengthening channeling policy: the Finnish approach to protecting domestic online gambling market, *Frontiers in Sociology*, Vol.8, (2024), DOI:10.3389/fsoc.2023.1272735

Khusnul Khotimah et al., Pertanggungjawaban Pidana Pembuat Konten Perjudian Online Berbasis Live Streaming Ditinjau Dari Kuhp dan UU ITE, *Jurnal Riset Multidisiplin Edukasi*, Vol.2, No.12 (2025), DOI:10.71282/jurmie.v2i12.1401

Kresna Satria Wibowo and Brahma Astagiri, Criminal Liability for Online Gambling Practices Based on Chapter 27 Paragraph (2) and Chapter 45 Paragraph (2) of Law Number 1 of 2024, *International Journal of Science and Environment*, Vol.6, No.1 (2026), DOI:10.51601/ijse.v6i1.339

Krisna Indrawan and M. Ruhly Kesuma Dinata, Analisis Yuridis Tindak Pidana Perjudian Online di Indonesia dalam Putusan Nomor 244/Pid.B/2024/PN Kbu, *Arus Jurnal Sosial dan Humaniora*, Vol.5, No.1 (2025), DOI:10.57250/ajsh.v5i1.1108

Made Ayu Adi Pradnyaningrat et al., Pertanggungjawaban Pidana terhadap Pelaku Penyalahgunaan Wewenang Tindak Pidana Korupsi, *Al-Zayn: Jurnal Ilmu Sosial & Hukum*, Vol.4, No.3 (2026), DOI:10.61104/alz.v4i3.5260

Martina, Penerapan Hukum terhadap Dugaan Fasilitasi Transaksi Judi Online oleh PT Espay Debit Indonesia Koe (DANA), *Presidensial: Jurnal Hukum, Administrasi Negara, dan Kebijakan Publik*, Vol.2, No.4 (2025), DOI:10.62383/presidensial.v2i4.1296

Maulidya Winatasya dan Citra Dwi Rahayuningsih, Hukum Pidana: Kajian Literature Review, *Journal of Literature Review*, Vol.1, No.1 (2025), DOI:10.63822/nrtk1447

Michael Egerer and Virve Marionneau, Blocking Measures against Offshore Online Gambling: A Scoping Review, *International Gambling Studies*, Vol.24, No.1 (2024), DOI:10.1080/14459795.2023.2190372

Muh Alfikram Azis et al., Tindak pidana judi online sebagai kejahatan siber: Analisis normatif terhadap efektivitas regulasi di Indonesia, *Innovative: Journal of Social Science Research*, Vol.5, No.4 (2025), DOI: 10.31004/innovative.v5i4.20675

Muhammad Yunus Rangkuti and Rio Rifaldi, Analisis Etika dan Hukum Dalam Perlindungan Situs Judi Online Oleh Pegawai Komdigi (Studi Kasus Klaster Pegawai di Kementerian Komunikasi dan Digital), *Jurnal Penelitian Ilmiah Multidisipliner*, Vol.1, No.04 (2025).

Murshal Senjaya, Law Enforcement of the Crime of Money Laundering That Comes from Online Gambling, *International Journal of Social Science*, Vol.2, No.3 (2022), DOI:10.53625/ijss.v2i3.3626

Nisa Amalina Adlina, Efektivitas Penegakan Hukum Perjudian Online di Indonesia: Mengatasi Hambatan Regulasi dan Implementasi, *Journal of Contemporary Law Studies*, Vol.2, No.2, 2025, DOI 10.47134/lawstudies.v2i2.3670

Nur Aminudin et al., A User-Driven E-Audit System for Improving Transparency and Efficiency in Regional Government Supervision, *Jurnal Teknik Informatika (JUTIF)*, Vol.6, No.4 (2025), DOI:10.52436/1.jutif.2025.6.4.5145

Pika Sari et al., The Application of Criminal Sanctions to Law Enforcement Officers Involved in Online Gambling, from the Perspective of Legal Positivism, *Indonesian Journal of Innovation Studies*, Vol.24, (2023), DOI:10.21070/ijins.v25i.977

Pratolo Saktiawan et al., Pembantuan dalam Hukum Pidana Indonesia: Analisis Pasal 56 KUHP dan UU No. 1 Tahun 2023, *Innovative: Journal of Social Science Research*, Vol.5, No.4 (2025), DOI:10.31004/innovative.v5i4.20843

Putranta Aswintama, Implementation of Role-Based Access Control, Multi Tenancy and Audit Logging in a Single Sign-On System, *Jurnal Mandiri IT*, Vol.14, No.1 (2025), DOI:10.35335/mandiri.v14i1.441

Rattaphong Sonsuphap, Governance and Strategies of Gambling Business in Southeast Asia, *Corporate and Business Strategy Review*, Vol.3, No.2 (2022), DOI:10.22495/cbsrv3i2art5

Reisa Arrifa and Ade Adhari, Pembuktian Pemenuhan Unsur Kesengajaan Pembantuan Tindak Pidana pada Putusan Pengadilan Negeri Medan Nomor 882/Pid.B/2024/PN Mdn, *Indonesian Journal of Law and Economics Review*, Vol.21, No.1 (2026), DOI:10.21070/ijler.v21i1.1409

Reni Purba et al., Criminal Offence of Online Gambling: An Indonesian Criminal Law Perspective, *LAW & PASS: International Journal of Law, Public Administration and Social Studies*, Vol.2, No.4 (2025), DOI:10.47353/lawpass.v2i4.56

Reza Yolawtry Simalango et al., Tindak Pidana Pencucian Uang dalam Perjudian Online: Tantangan Hukum dan Penegakan di Era Digital, *Jurnal Pendidikan Tambusai*, Vol.9, No.1 (2025), DOI:10.31004/jptam.v9i1.25435

Ridho Dwi Rahardjo and Wiwik Afifah, Kesesuaian Permenkominfo Nomor 05 Tahun 2020 dengan prinsip kebebasan berpendapat dan berekspresi dalam hak asasi manusia, *Bureaucracy Journal: Indonesia Journal of Law and Social-Political Governance*, Vol.2, No.2 (2022), DOI: 10.53363/bureau.v2i2.48

Rinalvin Achmad Wiryawan, Hak Warga Masyarakat terhadap Kebijakan Pemutusan Akses Penyelenggara Sistem Elektronik Lingkup Privat yang Tidak Terdaftar, *Jurnal Hukum & Pembangunan*, Vol.53, No.4 (2023), DOI:10.21143/jhp.vol53.no4.1533

Sartika Dewi et al., Implementasi Kebijakan Hukum dalam Pemberantasan Judi Online di Indonesia ditinjau dari Persfektif Politik Hukum, *Cendekia: Jurnal Hukum, Sosial dan Humaniora*, Vol. 3, No. 2, 2025, DOI: 10.70193/cendekia.v3i2.214

Septu Haudli Bakhtiar and Azizah Nur Adilah, Fenomena Judi Online: Faktor, Dampak, Pertanggungjawaban Hukum, *Innovative: Journal of Social Science Research*, Vol.4, No.3 (2024), DOI:10.31004/innovative.v4i3.10547

Sherly Bantu et al., Criminal Liability of Online Gambling Perpetrators In Indonesia According To The Electronic Information And Transactions Law, *Jurnal Impresi Indonesia*, Vol.3, No.9 (2024), DOI:10.58344/jii.v3i9.5414

Shulhan Iqbal Nasution, Mens Rea: Fondasi Pertanggungjawaban Pidana Dalam Sistem Peradilan Pidana Di Indonesia, *Iqtishaduna: Jurnal Ilmiah Mahasiswa Hukum Ekonomi Syari'ah*, Vol.7, No.1 (2025), DOI: 10.24252/iqtishaduna.v7i1.61542

Sindi Audia, Makna Penyalahgunaan Kewenangan dalam Perkara Tindak Pidana Korupsi, *Journal of Anti-Corruption*, Vol.1, No.1 (2025), DOI:10.30872/action.v1i1.1665

Sobirin Malian, Penyalahgunaan Wewenang Jabatan Oleh Pejabat Negara/Pemerintah: Perspektif Hukum Administrasi Negara Dan Hukum Pidana, *Jurnal Hukum Respublica*, Vol.20, No.1 (2020), DOI:10.31849/respublica.v20i1.5363

Tundjung Herning Sitabuana et al., Measuring The Effectiveness of Private Electronic System Organizers Regulations In Developing Social Media Equilibrium, *Law Reform*, Vol.19, No.2 (2023), DOI: 10.14710/lr.v19i2.56534

Vanessa and Hery Firmansyah, Analysis of the Validity of Electronic Evidence in Criminal Trial Proceedings and the Implementation of Its Admissibility (Judgment Study): Analisis Keabsahan Bukti Elektronik dalam Pemeriksaan Persidangan Perkara Pidana dan Implementasi Admisibilitasnya (Studi Putusan), *Indonesian Journal of Law and Economics Review*, Vol.20, No.4 (2025), DOI: 10.21070/ijler.v20i4.1395

Vaulus Julianta Nano et al., Analisis Teoritis Dolus dan Culpa dalam Konsep Kesalahan sebagai Dasar Pertanggungjawaban Pidana, *Al-Zayn: Jurnal Ilmu Sosial & Hukum*, Vol.4, No.2 (2026), DOI:10.61104/alz.v4i2.5100

Wahyu Dwi Oktafianto, Pertanggungjawaban Pidana Pelaku Turut Serta Dalam Tindak Pidana Korupsi Penerimaan Suap Oleh Hakim, *CENDEKIA: Jurnal Penelitian dan Pengkajian Ilmiah*, Vol.2, No.2 (2025), DOI:10.62335/cendekia.v2i2.967

Internet:

ANTARA. "Terdakwa Pengelola Agen Situs Judol Kominfo Divonis Empat Tahun", 2 September 2025, https://www.antaranews.com/berita/5082857/terdakwa-pengelola-agen-situs-judol-kominfo-divonis-empat-tahun, accessed on May 10, 2026

Kementerian Komunikasi dan Digital, "SAMAN Siap Operasi Penuh Oktober, 2,1 Juta Konten Judol Sudah Ditindak", 17 September 2025, https://www.komdigi.go.id/berita/siaran-pers/detail/saman-siap-operasi-penuh-oktober-21-juta-konten-judol-sudah-ditindak, accessed on May 10, 2026

Pusat Pelaporan dan Analisis Transaksi Keuangan, "Catatan Capaian Strategis PPATK Tahun 2025: Menjaga Kedaulatan dan Integritas Ekonomi Bangsa", 28 Januari 2026, https://www.ppatk.go.id/siaran_pers/read/1594/catatan-capaian-strategis-ppatk-tahun-2025-menjaga-kedaulatan-dan-integritas-ekonomi-bangsa-jakarta-28-januari-2026-b001hm0531i2026-.html, accessed on May 10, 2026

Tempo, "Terdakwa TPPU Judi Online Komdigi Divonis 4 Tahun Penjara," 27 Agustus 2025, https://www.tempo.co/hukum/terdakwa-tppu-judi-online-komdigi-divonis-4-tahun-penjara-2063711, accessed on May 11, 2026