

Criminal Responsibility Of Owners Of Cross-Country Online Gambling Platforms In The Indonesian Legal System (Decision Study Medan High Court No. 1018/PID/2023/PT MDN)

Agus Pian¹⁾ & Anis Mashdurohatun²⁾

¹⁾ Faculty of Law, Universitas Islam Sultan Agung (UNISSULA) Semarang, Indonesia,
E-mail: aguspian.std@unissula.ac.id

²⁾ Faculty of Law, Universitas Islam Sultan Agung (UNISSULA) Semarang, Indonesia,
E-mail: anism@unissula.ac.id

Abstract. *The development of information technology has shifted gambling practices from conventional forms to the digital sphere through websites and applications, giving rise to new patterns of crime that are fast, anonymous, and often involve infrastructure and controllers located outside Indonesia's jurisdiction. This situation creates serious challenges for law enforcement, particularly when the owners or controllers of online gambling platforms (operators/beneficial owners) are based abroad while the impacts and users are within Indonesia. This study aims to analyze the legal regulation of gambling offenses especially online gambling within Indonesia's criminal law system and to examine the obstacles and challenges of cross-border law enforcement against online gambling platform owners, including the possibility of extending criminal liability based on the principle of fault and the concept of liability for actors who control the means by which criminal acts are carried out. This research employs a normative legal approach with a descriptive qualitative legal research design. The approaches used include the statutory approach and the conceptual approach. The data are qualitative and derived from primary and secondary sources, with secondary data consisting of legislation, literature, and scholarly journals. Data collection is conducted through library research, while data analysis uses a descriptive-analytical method. The findings indicate that Indonesia's gambling regulatory framework is essentially available through the Criminal Code (KUHP) for conventional gambling and the Electronic Information and Transactions Law (UU ITE) for gambling-related content in electronic systems, and it is further reinforced by the National Criminal Code (National Criminal Code) as part of criminal law reform. However, in a cross-border context, law enforcement faces major obstacles, including difficulties in identifying the*

true “owner” behind a platform, jurisdictional differences, the placement of servers and domains overseas, digital payment mechanisms that complicate financial tracing, and the need for international cooperation (MLA/extradition) that is not always effective in practice. Using the Theory of Criminal Liability as an analytical framework, platform owners/controllers who exercise control and obtain economic benefits may be positioned as accountable subjects, provided that fault (intent/negligence) and a real connection to their role in providing or making accessible gambling facilities can be proven. Therefore, stronger enforcement strategies based on digital evidence, clearer mapping of offender roles (operator, promoter/affiliate, fund collector), asset tracing (follow the money), and enhanced cross-border cooperation are required so that enforcement does not stop at field-level actors but reaches the platform's primary controllers.

Keywords: *Criminal Liability, Platform Owner; Cross-Border; Indonesian Legal System; Online Gambling.*

1. Introduction

Indonesia is a state based on law, as stipulated in Article 1 paragraph (3) of the 1945 Constitution of the Republic of Indonesia (UUD 1945). This emphasizes that all aspects of national and social life must be based on applicable laws and regulations. Consequently, both the government and citizens are bound by law, with the aim of upholding justice, legal certainty, and protecting individual rights and freedoms. Within this framework, all forms of activity that violate positive law, including criminal acts of gambling, should be prevented and prosecuted firmly.

Gambling is a criminal offense that occurs in society. Gambling in Indonesia has a long history. Over time, gambling in Indonesia has grown rapidly. Gambling is the deliberate wagering of something of value or perceived value, with the awareness of the risks and speculative expectations of events such as games, matches, competitions, and events with uncertain outcomes. This practice extends beyond conventional methods such as card games, animal games, number guessing, and so on.¹

Kartini Kartono defines gambling as a deliberate bet, namely risking a value or something that is considered valuable by realizing that there are certain risks and hopes for events, games, matches, competitions and incidents that have uncertain/uncertain results.²

In general, gambling is an act that goes against religion, decency, and the Pancasila moral code and can harm society, the nation, and the nation's survival. Gambling is included in criminal law as a form of crime against morality, and gambling causes moral and psychological harm, especially to the younger generation.³

2. Research Methods

Method is the process, principles and procedures for solving a problem, while research is a careful, diligent and thorough examination of a phenomenon to increase human knowledge. Therefore, research methods can be interpreted as the process of principles and procedures for solving problems faced in carrying out research.⁴The aim of legal research is to broaden insight and increase the depth of the substance of legal science.⁵

¹Wirjono Prodjodikono, *Certain Criminal Acts in Indonesia*, First edition Eresco, Bandung, 1986, p. 129.

²Kartini Kartono, *Social Pathology*, Volume I, PT Raja Grafindo Persada Jakarta, 2014, p. 56

³Muh. Miqdad Al-Qifari, *Legal Certainty of the Use of Article 27 Paragraph (2) of the ITE Law in Online Gambling* (Study of Decision Number: 95/Pid.P/2021/Pn.Sby), *Bureaucracy Journal*, Vol. 3.

⁴Soerjono Soekanto, 1985, *Introduction to Legal Research*, UI-Press, Jakarta, p. 6.

⁵Artidjo Alkostar, 2018, *Prophetic Legal Research Methods*, UII Press, Yogyakarta,

3. Results and Discussion

3.1. Legal Regulations Regarding Criminal Acts Of Gambling, Especially Online Gambling, In The Indonesian Criminal Law System

This subsection addresses the first problem formulation, namely how to regulate gambling crimes, with an emphasis on online gambling, within the Indonesian criminal justice system. Online gambling is essentially still gambling, but its methods have changed: access via devices, promotion via social media, transactions via accounts/e-wallets, and system management from servers that may be located overseas. This shift in *modus operandi* requires a multi-layered reading of norms: the Criminal Code (both the old and the National Criminal Code), gambling control policies, and the latest ITE Law as a tool to ensnare gambling charges in the digital space.

Gambling has long been viewed as a disruptive activity within Indonesian criminal law. This stance is evident in the state's choice to regulate gambling not only through criminal laws but also through licensing policies and administrative action.⁶

Law Number 7 of 1974 concerning the Regulation of Gambling affirmed the direction of regulation and also provided the basis for strengthening criminal penalties for gambling. This law is important because it demonstrates that the state does not view gambling as a purely private matter, but rather as a public order issue that deserves to be addressed.⁷

The strengthening of this policy was then issued through Government Regulation Number 9 of 1981. This Government Regulation essentially prohibits the granting of permits for gambling operations and states that permits that have been granted are revoked, so that the element of "without a permit" in the crime of gambling has a strong policy context.⁸

As gambling moves into the digital space, the policy context remains relevant. Claiming "licensed" from another jurisdiction does not automatically eliminate its illegality under the Indonesian legal system, especially if the service targets Indonesians and lacks legitimacy from national authorities.⁹

p. 21.

⁶ Law of the Republic of Indonesia Number 7 of 1974 concerning the Regulation of Gambling.

⁷ Ibid.

⁸ Government Regulation of the Republic of Indonesia Number 9 of 1981 concerning the Implementation of Gambling Regulation.

⁹ Ibid.

Several criminal law policy studies warn that criminalization will be ineffective without a consistent enforcement strategy and the ability of authorities to adapt to changing methods. This is a crucial consideration for online gambling, which is fast-moving and adaptable.¹⁰

1. Formulation of Gambling Crimes in the Old Criminal Code and the National Criminal Code (Law 1/2023)

At the codification level, the old Criminal Code regulated gambling primarily through Articles 303 and 303 bis. Article 303 punishes those who offer or provide the opportunity to gamble, make it a livelihood, or participate in an unlicensed gambling enterprise; while Article 303 bis regulates the form of participation in gambling at an unlicensed event.¹¹

The old Criminal Code also contains a working definition of gambling in Article 303 paragraph (3): a game in which the chances of winning generally depend on luck, including betting on the outcome of a race or game. This definition serves as the basis for assessing whether an application/website containing bets meets the characteristics of gambling.¹²

The National Criminal Code (Law 1/2023) reformulates the crime of gambling in Articles 426 and 427. Structurally, the National Criminal Code still distinguishes between parties who 'open opportunities/organize' (facilitators) and parties who 'use opportunities' (players).¹³

A significant change is the criminalization technique, particularly the fines imposed. In the context of profit-oriented online gambling, fines and confiscation of the proceeds of crime have the potential to be more severe than mere imprisonment, especially for operators or network managers.¹⁴

The National Criminal Code does not come into effect immediately; its closing provisions establish a transitional period before it takes effect. Therefore, online gambling enforcement for the current period still relies heavily on the old Criminal Code and the Electronic Information and Transactions Law, while the National Criminal Code serves as a reference for future reform and harmonization.¹⁵

¹⁰ Lefri Mikhael, & Yuber Lago. (2022). Criminal law policy in combating gambling crimes in Indonesia. *Badamai Law Journal*, 7(2), 301–318.

¹¹ Criminal Code Article 303.

¹² Criminal Code Article 303 paragraph (3)

¹³ Law of the Republic of Indonesia Number 1 of 2023 concerning the Criminal Code. (2023). Articles 426–427.

¹⁴ *Ibid.*

¹⁵ *Ibid.* Article 624

2. Gambling Content Crimes in the Latest ITE Law (Law 1/2024)

Online gambling stands out not only because of its 'games', but because of the way its content is distributed. The latest ITE Law (Law 1/2024) places gambling content as an object that is prohibited from being distributed, transmitted, or made accessible through electronic systems (Article 27 paragraph (2)).¹⁶

The criminal penalties are stipulated in Article 45 paragraph (3). With this construction, enforcement can reach actors working in the promotion and distribution sector, such as affiliates, community admins, digital marketers, or those who routinely share registration links, referral codes, and deposit guides.¹⁷

In terms of proof, the three forms of action in Article 27 paragraph (2) need to be understood practically. 'Distributing' and 'transmitting' generally relate to the sending or dissemination of content; while 'making accessible' often relates to the provision of links/channels that open the way for the public to access gambling services.¹⁸

The assessment of "gambling content" should not be based solely on terms or appearance, but should be linked to the actual context of gambling: deposit mechanisms, betting, odds, and payouts. Without due care, enforcement could be drawn into content that is educational or journalistic in nature.¹⁹

Research on online gambling law enforcement generally considers Article 27 paragraph (2) to be effective as an entry point, because the digital trail of promotion and distribution is relatively easy to trace compared to dismantling the core operator structure which often hides outside the jurisdiction.²⁰ In the literature, criminal liability is commonly understood to require:

- a. the ability to be responsible,
- b. the existence of an error (intentional or negligent), and

¹⁶ Law of the Republic of Indonesia Number 1 of 2024 concerning the Second Amendment to Law Number 11 of 2008 concerning Electronic Information and Transactions Article 27 paragraph (2).

¹⁷ Ibid. Article 45 paragraph (3)

¹⁸ Omega Putri Yesika Mawei, Herlyanty Yuliana A. Bawole, & Victor Demsi Denli Kasenda. (2025). Law enforcement of online gambling based on Article 27 paragraph (2) of the ITE Law. *Lex Administratum*, 13(1), 1–12.

¹⁹ Marsudi Utoyo, Kinaria Afriani, Rusmini, & Husnaini. (2020). Intentional and unintentional in Indonesian criminal law. *Lex Librum: Journal of Legal Studies*, 7(1), pp. 75–85.

²⁰ M. Aenur Rosyid. (nd). Criminal law textbook. UIN KHAS Jember. Principles of guilt and criminal responsibility, pp. 51–57

- c. There is no excuse for the crime. This framework ensures that punishment is not based solely on the consequences, but on the perpetrator's deplorable nature.²¹

If this framework is applied to online gambling, the analysis steps become more measurable. First, identify the perpetrator's role: operator/core manager, promoter/affiliate, fundraiser, or player. Second, match each role's actions with the relevant articles (the Criminal Code or the Electronic Information and Transactions Law). Third, test their culpability: whether they knew, intended, or were at least aware of the consequences of their actions.²²

For operators, intent is usually evident in system management: game setup, account management, customer service, and payment integration. For affiliates or community admins, intent is often demonstrated through promotional posting patterns, referral link usage, or commission receipt. For players, however, evidence focuses more on the use of gambling opportunities and transaction flow.²³

Proof in online gambling cases ultimately relies on electronic evidence and transaction records. Access traces, upload history, digital conversations, and account/e-wallet transactions are key to linking the crime to the perpetrator, as well as demonstrating the level of control and intent.²⁴

With the aid of criminal liability analysis, enforcement can avoid simply "catching the easy ones." Focus can be directed at the nodes most crucial to the network's survival, without neglecting the principles of legal certainty and proportionality of punishment.²⁵

Because online gambling combines substantive crimes (gambling) and medial crimes (gambling content), the issue of harmonizing articles is unavoidable. The Criminal Code (both the old and the National Criminal Code) addresses the core of organizing and participating in gambling; the ITE Law addresses the distribution and accessibility of gambling content in the digital space.²⁶

²¹Ibid.

²² Marsudi Utoyo, Kinaria Afriani, Rusmini, & Husnaini. (2020). *Lex Librum: Journal of Legal Studies*, 7(1), pp. 75–85.

²³ Law of the Republic of Indonesia Number 1 of 2023 concerning the Criminal Code. (2023). Articles 426–427.

²⁴ Law Number 11 of 2008 concerning Electronic Information and Transactions. (2008). Provisions on electronic evidence and systems, pp. 6–8.

²⁵ Lefri Mikhael, & Yuber Lago. (2022). *Badam Law Journal*, 7(2), 301–318.

²⁶ Law of the Republic of Indonesia Number 1 of 2024 concerning the Second Amendment to Law Number 11 of 2008 concerning Electronic Information and Transactions. Article 27 paragraph (2).

In prosecution practice, prosecutors can formulate alternative or cumulative charges, but must ensure that there is no double punishment for essentially the same act. Therefore, the selection of articles should be based on the perpetrator's role and the strongest evidentiary facts. Going forward, when the National Criminal Code comes into effect, the categorical fine system will open up more adaptive sentencing opportunities. For perpetrators who enjoy significant profits from online gambling, high fines, asset confiscation, and profit disruption may be more effective than imprisonment alone. Conversely, for perpetrators with peripheral roles and small profits, proportionality considerations need to be prioritized to ensure that punishment is not counterproductive and does not obscure the primary targets of enforcement: the operators and networks providing gambling opportunities.

The regulation of online gambling in the Indonesian criminal law system is multi-layered: the gambling offense in the Criminal Code (the old and the National Criminal Code/Law 1/2023) is reinforced by regulatory policies (Law 7/1974 and Government Regulation 9/1981), and is complemented by the gambling offense in the latest ITE Law (Law 1/2024). The theory of criminal responsibility is used as an analytical tool to ensure that punishment is directed at perpetrators who have intent and actual control over the organization, promotion, or facilitation of online gambling, while maintaining legal certainty and proportionality of punishment.²⁷

3.2. Obstacles and Solutions Faced in Law Enforcement Against Owners of Cross-Border Online Gambling Platforms in Indonesia

In the process of investigating and investigating online gambling crimes, the police investigative task force often finds various obstacles that hinder the handling of online gambling cases, both internal and external obstacles which of course hinder the implementation of law enforcement in accordance with its duties and responsibilities under applicable laws and regulations.²⁸

Although enforcement efforts against online gambling crimes can be considered effective, investigators often encounter certain difficulties. These include the requirement for perpetrators to be apprehended in action, the need for concrete evidence at the time of arrest, and the presence of objects that explicitly promise profits for both perpetrators and online gamblers. These obstacles demonstrate

²⁷Ibid.

²⁸Barkatullah, Abdul Halim. 2017. *Electronic Transaction Law in Indonesia*. Bandung: Nusa Media Publisher, p. 67.

the complexity of handling online gambling cases, which requires an integrated and multifaceted law enforcement strategy.²⁹

In enforcing the law against online gambling crimes, law enforcement officers face a number of obstacles that can be categorized as internal and external obstacles.

1. Internal obstacles are closely related to the internal capacity and infrastructure of law enforcement agencies.
 - a. The limited human resources with specialized expertise in handling cybercrime is a major obstacle, given the ever-growing complexity and dynamics of these crimes alongside technological advancements. Cybercrime requires specialized technological expertise, requiring human resources to understand programming, hacking methods, and in-depth knowledge of ever-evolving network systems. Furthermore, training in this area is often inadequate, out of step with developments in the cyber world, hindering the identification, investigation, and prosecution of cybercrime cases, including online gambling.
 - b. Lack of funding and costs are also significant inhibiting factors. Handling online gambling cases requires significant funding, particularly for the technology and human resources involved. Budget constraints can limit the ability of law enforcement agencies to deploy all necessary resources to handle online gambling cases.
 - c. The lack of sophisticated information technology equipment is due to the complexity of these crimes, which often involve technological advancements. Inadequate equipment can hinder the ability to trace digital footprints for effective investigations, which can support the process of gathering evidence for arrests and prosecutions.
 - d. Weaknesses in the internal oversight system impact the effectiveness of handling online gambling cases. An inefficient system complicates the detection of illegal online activity, including online gambling. Without a robust system to monitor online activity, criminals can easily infiltrate and operate undetected by authorities. This impacts the ability of law enforcement agencies to gather evidence and prosecute online gambling perpetrators, which can result in perpetrators escaping accountability.
 - e. Lack of Budget for Handling Gambling Crimes: The limited budget will hamper the implementation of programs for conducting investigations and inquiries.

²⁹Kartini, Kartono 1997, *Gambling and Its Consequences*, Jakarta: PT. Rajawali Grafindo Persada. P. 76

Facilities and infrastructure require maintenance and upkeep, so additional funding is needed to meet maximum needs.³⁰

2. External barriers

- a. The increasingly sophisticated dynamics of online gambling crimes, including the use of encryption technology and servers located outside national jurisdictions, can complicate the identification and prosecution processes. The use of encryption technology, which allows criminals to conceal their digital footprints, can make it difficult for law enforcement officials to track and monitor illegal online gambling transactions. Furthermore, servers located outside national jurisdictions provide legal protection for perpetrators, as the rules and regulations of other countries may be different or more lenient than those of their home country. This, in turn, encourages law enforcement to seek cooperation with foreign authorities to address crimes where extradition and prosecution of perpetrators operate in different jurisdictions.
- b. Limited international cooperation in addressing transnational crime also hampers the arrest of online gambling perpetrators. This is because online gambling often involves perpetrators from various countries operating in different jurisdictions, limiting the exchange of information and policies on cybercrime handling during arrests. Furthermore, cultural, language, and political differences create loopholes that hinder effective law enforcement. Consequently, perpetrators exploit these loopholes to escape punishment.
- c. For online gamblers, the main obstacle is the high risk of arrest and punishment. This is because they realize that illegal activity can lead to serious legal consequences, leading to anxiety that interferes with their online gambling activities. Second, there is the challenge of accessing safe and reliable gambling platforms amidst attempts to close and block them by authorities. Legal action by law enforcement agencies forces gamblers to access new platforms without hindrance, while considering the security risks they intend to exploit.

These barriers highlight the need for a comprehensive strategy and cross-sectoral and international collaboration to improve the effectiveness of law enforcement against online gambling crimes. Taken together, these barriers create an unstable and stressful environment for online gamblers, with a high risk of arrest and

³⁰Tri Wahyudi, Obstacles to Investigation of Gambling Crimes, Scientific Journal, 2015

conviction, and difficulties in finding and accessing safe and reliable gambling platforms.³¹

An effort to enforce crime through rational criminal law enforcement, namely fulfilling a sense of justice and effectiveness. In the context of enforcing crime, namely means as a reaction that can be given to perpetrators of crime, in the form of criminal means or non-criminal law, which can be integrated with one another. If criminal means are called for enforcing crime, it means that criminal law will be implemented, namely holding elections to achieve criminal legislation results according to various circumstances and situations at a time and for the future. An effort to enforce crime through rational criminal law enforcement, namely fulfilling a sense of justice and effectiveness.

In the context of enforcing crime, the means as a response that can be given to perpetrators of crime, in the form of criminal and non-criminal law means, which can be integrated with one another. If criminal means are called upon to enforce crime, it means that criminal law will be implemented, namely holding elections to achieve criminal legislation results according to various circumstances and situations at a certain time and for the future.

What crime prevention policy should be implemented with non-penal means? Basically, it only includes the use of social means to improve certain social conditions, but indirectly influences efforts to enforce the occurrence of crime. In order for the legal system to function, there needs to be integration between legal substance, legal structure, and legal culture.

Criminal action prevention efforts are an effort to overcome crime through the enforcement of criminal law, which is rational, namely fulfilling a sense of justice and effectiveness. In order to overcome crime, various means as a reaction that can be given to perpetrators of crime are preventive and repressive, which can be integrated with one another. If criminal means are called upon to overcome crime, it means that criminal law policy will be implemented, namely holding elections to achieve criminal legislation results that are appropriate to the circumstances and situations at a certain time and for the future.³²

The essence of law enforcement is that it is part of legal policy regarding crime occurring in the social environment, inseparable from public policy. It is implemented within the criminal justice system, thus serving a dual function. Law

³¹Ahadi Fajrin Prasetya, Law Enforcement Against Online Gambling Based on Law Number 19 of 2016 Concerning Electronic Information and Transactions, *Justicia Sains: Journal of Legal Studies*, Vol 8, 1, p. 17

³²Sudarto. *Selected Chapters on Criminal Law*, Alumni, Bandung, 1986, pp. 22-23

enforcement, on the one hand, plays a role in controlling crime, while on the other, it can prevent or reduce crime.³³

The efforts and role of law enforcement are crucial in eradicating all criminal acts. The police, as one of the law enforcement agencies, are expected to prevent, address, and eradicate online gambling. This is the primary duty of the Indonesian National Police (Polri) as stipulated in Law Number 2 of 2002 concerning the Indonesian National Police. The primary duties of the Indonesian National Police are regulated in Article 13 of Law Number 2 of 2002 concerning the POLRI, which states: "Maintaining public security and order, enforcing the law, and providing protection, guidance, and services to the community."

Gambling itself is usually driven by economic factors, which drive perpetrators to take shortcuts through online gambling to gain profits. Furthermore, unemployment drives people to seek income from online gambling, as does a consumerist lifestyle. Other contributing factors include easy access to technology, weak social values, principles, and education, which can lead individuals to engage in illegal behavior.³⁴

In fact, in the process of enforcing the law against perpetrators of online gambling crimes, law enforcement agencies not only face internal and external obstacles, but also undertake various efforts to address the obstacles related to the prosecution of online gambling, which is rampant in society.³⁵

1. Efforts to Overcome Internal Barriers:

a. Human Resources.

Conducting regular recruitment and training to increase the number of personnel with specialized expertise in handling cybercrime. Here, law enforcement agencies collaborate with educational institutions to develop training programs and curricula relevant to the latest technological developments.

This can support the ability of individual law enforcement officers to carry out their duties. The government can also provide incentives or rewards for personnel with

³³J. E Sahetapy in Abdul Wahid, 2002, *Contemporary Criminology and Crime*, Faculty of Law Publishing Institute, Unisma, Malang.

³⁴Rosidah, Nikmah. 2016. *Construction of Gambling Prevention in Indonesia*. Semarang: Pustaka Magister Semarang.

³⁵Badruzaman, D. (2019). Legal Review of Mobile Internet in an Effort to Prevent the Negative Impacts of Information and Communication Technology in Indonesia. *Adjudication: Journal of Legal Studies*, Vol. 3, 2, pp. 135-152.

specialized skills to attract and retain talent in the technology sector and their expertise in apprehending online gambling perpetrators.

Human resources in efforts to eradicate online gambling crimes are an important factor, because if there is a lack of understanding and mastery of personnel in the information technology sector, it can affect the performance of police officers in eradicating cybercrime, because online gambling relies heavily on internet facilities as a means of carrying out its criminal acts.

b. Information Technology Equipment

Increase the budget for the procurement of sophisticated and cutting-edge information technology equipment. By collaborating with the private sector to gain access to and utilize the latest technology in combating cybercrime, law enforcement agencies can not only develop integrated internal systems and applications to support investigations and prosecutions, but also improve the tools they utilize in carrying out their duties as law enforcement agencies.

c. Internal Control System

Establish and implement an effective and efficient internal oversight system to monitor online activity in real time. This will be achieved by improving coordination between law enforcement agencies to strengthen monitoring and early detection systems, and by raising awareness through public education about the dangers of online gambling and how to report it to authorities.

4. Conclusion

Online gambling crimes pose a complex challenge to Indonesia's law enforcement system due to their detrimental economic and social impacts, particularly among students. Therefore, law enforcement must consider the principles of the theory of dignified justice, which draws on existing legal frameworks such as the Electronic Information and Transactions Law (UU ITE) and the Criminal Code. Their enforcement must be firm and fair, while still respecting the human rights of perpetrators by providing opportunities for rehabilitation and proportionate case handling. This requires cross-sectoral and cross-national collaboration, along with the advancement of increasingly sophisticated information technology in this digital era. Thus, law enforcement can be based on dignified justice, resulting in effective, fair, and sustainable law enforcement. Law enforcement efforts against online gambling crimes continue to face a number of obstacles, both internal and external. Internal obstacles include limited human resources with expertise in cybercrime, a lack of advanced technology, and weaknesses in internal cyber oversight systems. External obstacles include the increasingly sophisticated dynamics of online gambling crimes, limited cooperation between countries with

differing legal and political systems, and the risks to perpetrators associated with arrest and punishment. Overcoming these obstacles requires an integrated and collaborative law enforcement strategy across sectors and internationally. Law enforcement against online gambling crimes involves a series of efforts by law enforcement agencies to overcome various obstacles, both internal and external. This requires efforts to improve human resources, procure advanced information technology equipment, strengthen internal oversight systems, enhance international cooperation, and implement firm law enforcement policies. With this comprehensive effort, it is hoped that online gambling law enforcement will be more optimal, with comprehensive and collaborative efforts across sectors and internationally, resulting in effective and efficient enforcement, ensuring firm action against online gambling perpetrators, guided by the theory of dignified justice.

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