



Research Article

Legal Reconstruction as a Policy Bridge: Advancing Criminalization of Online Gambling Amid National Differences

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Abstract

Online gambling is a rapidly growing global phenomenon affecting countries across the world and creating complex legal, social, economic, and technological challenges. However, each nation adopts different domestic policies that shape how it regulates, monitors, and enforces online gambling laws, resulting in regulatory fragmentation and difficulties in addressing cross-border gambling activities. This study aims to develop an ideal legal reconstruction framework for the future criminalization of online gambling amid divergent domestic policies. This research uses a normative legal method with legislative, conceptual, and comparative approaches to examine existing regulations, legal principles, and comparative practices concerning online gambling criminalization. The results indicate that an ideal legal reconstruction to address online gambling in Indonesia must encompass three strategic dimensions. First, reform substantive criminal law by establishing primary and additional penalties for both organizers and individual perpetrators of online gambling, including classifying offences by scale small, medium, and large imposing fines proportionate to the offender's income, and applying supplementary sanctions such as fines and community service. Second, harmonization of domestic policies through international cooperation, extraterritorial enforcement, and alignment of national online gambling regulations to strengthen cross-border legal enforcement. Third, adoption of technological approaches in law enforcement through digital monitoring, private-sector involvement in blocking illegal gambling sites, and AI-based detection of suspicious transactions. These dimensions provide an integrated framework for strengthening Indonesia's legal response to the evolving challenges of online gambling.

Keywords

Criminalization, Domestic Policy, Legal Reconstruction, Law Enforcement, Online Gambling

1. Introduction

Technological advancements have profoundly transformed the nature of gambling, rendering it significantly more accessible and transparent compared to previous eras. Traditionally, gambling activities were confined to physical spaces or hidden venues, often operating in secrecy due to legal and social constraints. However, the advent of internet-

enabled devices such as computers and smartphones has enabled individuals to engage in gambling activities from virtually any location. This shift has not only expanded the reach of gambling platforms but also introduced new regulatory and enforcement challenges, particularly in the context of online gambling, which transcends traditional

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jurisdictional boundaries [1]. This innovation enables individuals to access various online gambling platforms from the comfort of their homes, without time or location restrictions. This convenience shows that technology has not only transformed how people gamble but has also expanded its reach and potential societal impact [2].

The global online gambling market has experienced rapid growth, driven by the relaxation of regulations across various jurisdictions, which has made access to gambling practices increasingly seamless in everyday life [3]. The industry is projected to generate global revenues of up to US\$531 billion by 2025, reflecting a massive wave of commercial expansion [4]. In the United States, the sports betting market alone is projected to grow to US\$6.5 billion over the next five years, despite limited understanding of bettors' psychographic characteristics [5]. The advent of the internet has revolutionized traditional gambling practices into more diverse and easily accessible online forms across international borders [6]. The digital transformation of gambling has concurrently facilitated the emergence of modern transnational crimes, notably cross-border online gambling activities that transcend geographical boundaries and legal jurisdictions. This phenomenon poses significant challenges to both international and national law enforcement agencies, complicating regulatory oversight and enforcement. Online gambling platforms are frequently exploited as conduits for illicit activities such as money laundering, fraud, and the misuse of personal data, thereby amplifying the risks associated with this sector. These developments underscore the urgent need for a comprehensive, adaptive, and responsive global legal and regulatory framework that can effectively address the complexities and evolving dynamics of the contemporary online gambling industry.

Gambling has existed for centuries; however, the internet has made it more accessible and diverse [6]. Cross-border online gambling represents a modern form of crime that has evolved alongside advances in information technology and globalization. This type of crime transcends geographical boundaries and traditional jurisdictions, thereby presenting new challenges for both international and national legal systems [7]. For instance, online gambling platforms operated in one country may involve players from multiple other countries, resulting in negative consequences such as financial losses, misuse of personal data, and cross-border money laundering [8].

Cross-border online gambling presents new challenges for ensuring consistent social and economic protections internationally [9]. This issue often triggers conflicts among countries because divergent policies and legal systems govern online gambling. Several nations have adopted liberal policies toward online gambling, choosing to legalize or regulate such activities as part of broader economic strategies. For example, countries like the United Kingdom, Canada, Germany, and Singapore [10], along with U.S. states such as Nevada and New Jersey, have implemented regulatory frameworks for

online gambling. These measures aim to mitigate the negative impacts of illegal gambling, enhance oversight through controlled channels, and generate substantial tax revenues, thereby reflecting a pragmatic approach to managing the complexities of the evolving online gambling industry.

Although several countries have adopted liberal policies toward online gambling, this approach presents significant challenges under international law. This is primarily because not all countries share the same perspective on the legality of gambling [10]. Conservative nations with strict regulations, such as Indonesia, Malaysia, and the majority of Muslim-majority countries, classify online gambling as an illegal activity that must be eradicated. This divergence creates a substantial gap between countries that legalize online gambling and those that categorically prohibit it. Consequently, online gambling operators often exploit these policy discrepancies by relocating their operations to jurisdictions where gambling is permitted. This phenomenon not only hinders global efforts to combat illegal online gambling but also complicates cross-border cooperation in addressing related transnational crimes. Legal analysis can facilitate the development of regulatory models by comparing laws across different scales, both macro and micro, based on predefined variables. A fundamental principle in such comparative studies is that the comparisons must be proportionate and equitable [11].

When a country attempts to prosecute offenders located outside its jurisdiction, regulatory gaps and limited international cooperation often pose significant obstacles. Consequently, law enforcement against such crimes becomes ineffective, allowing perpetrators to continuously exploit existing legal loopholes [12]. Moreover, cross-border online gambling has considerable social impacts; it not only causes financial harm to individuals but also contributes to increased gambling addiction [13], adversely affecting mental health [14] and family harmony [15]. This situation is further exacerbated by low public awareness of the risks and consequences associated with online gambling, especially those involving illegal sites [16]. In Indonesia, online gambling has emerged as a critical issue within both legal and social domains [17].

Based on the foregoing, online gambling has emerged as a critical issue in the era of globalisation, with its primary challenge rooted in divergent domestic policies on the legality of such practices. While some nations adopt a liberal approach by legalising and regulating online gambling as part of their economic strategy, others consider it illegal, conflicting with their laws, social norms, cultural values, and religious principles. This lack of harmony creates gaps in the global legal system that offenders often exploit to evade legal sanctions. Therefore, legal reconstruction is imperative to establish a more effective, harmonious, and adaptive legal framework that can address the cross-border challenges posed by online gambling. This study focuses on comprehensive criminalisation efforts and the importance of international cooperation, exploring approaches that strengthen law

enforcement while balancing national interests with global needs. Ultimately, the research seeks to develop an ideal legal reconstruction model to effectively manage the evolving dynamics of online gambling criminalisation amid policy disparities across countries.

This study uses a normative legal method with a conceptual, legislative, and comparative approach [18]. The conceptual approach constructs a theoretical framework on the criminalization of online gambling in domestic policies across countries, grounded in legal doctrines, principles, and both national and international legal substance. The legislative approach assesses the consistency of prevailing legal norms, while the comparative approach analyses online gambling policies in countries such as Germany and Singapore. The research data consist of primary, secondary, and tertiary legal materials collected through legal inventory processes, subsequently classified for in-depth analysis by examining the underlying principles, values, and norms. The normative legal data analysis follows several stages: first, formulating secondary data and positive law as the basis of legal principles; second, developing relevant legal understanding aligned with the research problem; third, establishing applicable legal standards; and fourth, detailing the legal obstacles identified during the analysis process.

2. Research Method

This study uses a normative legal research method, employing statutory, conceptual, and comparative approaches. The statutory approach examines the consistency and adequacy of legal provisions governing online gambling and its criminalization, while the conceptual approach analyses relevant legal doctrines, principles, and theories concerning criminalization, sanctions, jurisdiction, and law enforcement. The comparative approach examines the legal policies of Germany, Russia, and Indonesia to identify differences, strengths, limitations, and regulatory gaps. The legal materials consist of primary, secondary, and tertiary sources, collected through legal inventory and documentary research and subsequently classified by legal status, jurisdiction, substantive subject matter, and relevance to the research problem.

The collected legal materials are analyzed through qualitative normative legal analysis by examining legal principles, norms, coherence, and normative implications. The analysis proceeds in four stages: identifying relevant positive law and underlying legal principles; developing a legal understanding of the research problem; establishing applicable legal standards through comparative analysis; and identifying legal obstacles and regulatory gaps. The study adopts a prescriptive and reconstructive orientation to formulate an ideal framework for online gambling criminalization, focusing on three dimensions: (1) reformulation of criminal sanctions and offence classifications; (2) harmonization of domestic policies through international cooperation and extraterritorial enforce-

ment; and (3) integration of technological mechanisms, including digital monitoring, blocking measures, and AI-based detection of suspicious transactions.

3. Results and Discussion

3.1. Comparative Analysis of Domestic Policies in Germany, Russia and Indonesia on the Criminalization of Online Gambling

Gambling is legally permitted in over 80% of countries globally, with 164 out of 193 allowing forms such as lotteries and table games. Europe and the United States largely permit gambling, while Asia remains the most restrictive region, with only 28 of 45 countries (61%) allowing it. Between 2018 and 2021, 67 countries (35%) enacted new gambling-related regulations, primarily in Europe, where 21 of 48 jurisdictions (43.8%) tightened rules on advertising and marketing due to rising social and public health concerns. In contrast, Asia made few regulatory changes, reinforcing its stance against legal gambling [19].

Gambling encompasses various games such as [20] poker, blackjack, roulette, slot machines, sports betting, and bingo, many of which are accessible online. Government attitudes toward gambling significantly influence the gambling culture within a region. Legalization of gambling tends to increase gambling participation and may elevate the risk of underage individuals engaging in such activities. Conversely, government interventions often highlight the negative consequences of gambling, emphasizing substantial financial losses and its illegal nature in certain jurisdictions [21].

In Indonesia, online gambling is categorized as an activity that conflicts with prevailing social norms and legal frameworks, thus being classified as an unlawful act [22]. Although online gambling can provide entertainment, it inherently carries the potential to induce deviant behaviours and even criminal acts [23].

Over the past five years, there has been widespread recognition of the significant health, social, and economic harms experienced not only by major gamblers but also by their families, social networks, and broader communities [24]. Each country adopts distinct legal frameworks to address the rapidly growing phenomenon of online gambling. These policy differences reflect domestic cultural, economic, and political factors, as well as commitments to international principles. In this context, the national policies of countries such as Germany, Russia, and Indonesia vary significantly, particularly regarding the criminalization of online gambling. Despite divergent approaches, these policies fundamentally share the common objective of regulating and combating illegal gambling activities in the digital realm. Law enforcement in Germany adopts a comprehensive approach grounded in the principles of a democratic constitutional state (*Rechtsstaat*). The German legal system seeks to balance societal protection with

individual freedoms, particularly in regulating online gambling and casinos. Recognizing gambling as an activity with potential social and economic risks, Germany implements stringent regulations under the Strafgesetzbuch (StGB), the German Criminal Code. This legal framework not only criminalises certain forms of illegal gambling but also establishes

clear guidelines to ensure that gambling activities operate within a controlled and monitored environment. Such an approach reflects Germany's commitment to mitigating the adverse impacts of gambling while preserving fundamental rights, demonstrating a nuanced legal strategy that integrates prevention, regulation, and enforcement.

Table 1. Legal Policy Regarding Online Gambling in Germany.

Legal Aspect	Germany's Policy on Online Gambling
Legal Basis	German Criminal Code (Strafgesetzbuch - StGB)
Scope of Illegal Gambling	Article 24 StGB Organizers offering games of chance (including online casinos) without state approval face legal prosecution.
Sanctions Against Illegal	Under Article 284, which regulates unauthorized gambling operations: (1) Anyone openly organizing or operating hit-and-run gambling games or providing facilities without authorized permission shall be sentenced to imprisonment of up to 2 years or fined up to IDR 1 billion. (2) Games of chance in associations or private places considered public if held irregularly, with offenders facing imprisonment from 3 months to 5 years if acting commercially or as members of a group. (3) Public advertisement of gambling is punishable by imprisonment of up to 1 year or fines.
Penalties for Participation in Illegal Gambling	Article 285 stipulates that any person who participates in public gambling games is subject to a criminal penalty of imprisonment for up to six months or a fine not exceeding 180 times their daily income.

Germany's online gambling regulation reflects the government's strong commitment to controlling illegal gambling through a dual policy approach. First, it strongly emphasizes official licensing, requiring operators to obtain authorization from relevant authorities before offering gambling services. Second, sanctions also apply to participants in illegal gambling activities, though penalties are less severe than those imposed on organizers. The criminal law framework governing online gambling is primarily codified in Articles 24, 284, and 285 of the Strafgesetzbuch (StGB), providing a comprehensive legal structure for regulating gambling activities, including online casinos. This focus on state approval and punitive measures for both operators and participants illustrates a preventive strategy aimed at protecting society from the adverse effects of illegal gambling, while simultaneously ensuring that lawful gambling activities remain well-regulated and controlled.

In 2017, the Russian government blocked over 5,000 websites deemed to provide illegal gambling services [25]. Subsequently, on July 29, 2018, Federal Law No. 227-FZ amended and strengthened Article 171.2 of the Russian Criminal Code (KUHP). This legislative change aimed to enhance law enforcement against illegal gambling activities, particularly targeting unauthorized organizations and online gambling operators functioning without government approval. The policy responded to the surge of illicit online gambling threatening the integrity of Russia's legal market and social security. Article 171.2 outlines penalties for illegal organizations and unlawful gambling conduct, and the 2018 amendment emphasises regulating operators involved in both physical and online illegal gambling activities. The following section elaborates on Russia's legal framework addressing online gambling through Article 171.2 KUHP concerning illegal organizations and gambling offences.

Table 2. Legal Policy Regarding Online Gambling in Russia.

Legal Aspects	Russia's Policy on Online Gambling
Legal basis	Article 171.2 of the Criminal Code (as amended by Federal Law No. 227-FZ dated July 29, 2018) addresses illegal organizations and gambling-related offenses. This provision criminalizes the organization and conduct of unauthorized gambling activities, imposing stringent penalties to combat illicit gambling operations. The amendment reflects Russia's intensified legal efforts to regulate gambling and curb associated criminal behavior

Legal Aspects	Russia's Policy on Online Gambling
Scope of Illegal Gambling	The illegal gambling framework includes several specific violations: (1) the use of fixed outdoor gambling equipment without authorization; (2) operation without the requisite permits as mandated by prevailing laws and regulations; (3) provision of gambling facilities involving network and telecommunications services, including the internet and mobile communications, without proper licensing; (4) systematic provision of venues for illegal gambling activities; and (5) failure to comply with certain exemptions, such as interactive betting conducted exclusively at authorized locations. These criteria delineate the boundaries of lawful and unlawful gambling operations, reinforcing regulatory oversight and legal enforcement.
Sanctions for illegal gambling organizations	Individuals or entities engaged in the aforementioned illegal gambling activities face a range of sanctions including: (1) fines between 300,000 and 500,000 rubles, or an amount equivalent to the offender's wages or other income over 1 to 3 years; (2) social work penalties lasting 180 to 240 hours; (3) restriction of personal freedoms for up to four years; and (4) imprisonment for up to two years. These sanctions reflect a graduated punitive approach, aimed at deterring unlawful participation in gambling while allowing for proportionality based on the severity of the offense.
Large Scale Violation Sanctions	When violations are committed by a group acting with prior agreement or involve substantial financial gain, the penalties are correspondingly severe. These include: (1) fines ranging from 500,000 to 1 million rubles, or an amount equivalent to the convicted individual's wages or other income for 3 to 5 years; (2) imprisonment for up to four years; and (3) additional fines of up to 500,000 rubles or income equivalent for three years (optional). Such sanctions underscore the legal system's emphasis on deterring coordinated illegal gambling activities that generate significant profits.
Sanctions for Violations Committed by Organized Groups or Officials	When illegal gambling activities are conducted by an organized group or individuals holding official positions, and involve substantial profits, the sanctions are intensified. These include: (1) fines ranging from 1 to 1.5 million rubles, or an equivalent of wages or other income for 4 to 5 years; (2) imprisonment for up to six years; (3) additional fines up to 1 million rubles or income equivalent for five years (optional); and (4) disqualification from holding certain positions or participating in specific activities for up to five years (optional). These measures reflect the severity with which Russian law addresses organized and high-profit illegal gambling operations.

Article 171.2 mandates Russian authorities, including the Federal Security Service (FSB) and the Ministry of Internal Affairs, to intensify efforts in prevent and combat illegal gambling. Enforcement measures encompass: (1) Website Blocking, where Roskomnadzor is responsible for restricting access to illegal gambling sites operating domestically and internationally, collaborating with internet service providers to detect and block unauthorized platforms; (2) Financial Transaction Monitoring, involving cooperation with financial institutions to halt transactions linked to illegal gambling, obligating banks and payment systems operating in Russia to refuse processing such payments; and (3) International Cooperation, through partnerships with foreign governments to block illegal gambling operators functioning beyond Russian legal jurisdiction, addressing the cross-border nature of the illicit

online gambling market.

Indonesia currently relies on two updated legal frameworks to regulate online gambling: the amended Criminal Code of 2023 and the revised Electronic Information and Transactions Law of 2024. These statutes collectively form the core of Indonesia's policy on online gambling, with the Criminal Code addressing both physical and digital gambling offences through stricter sanctions targeting perpetrators, organizers, and participants. Meanwhile, the Electronic Information and Transactions Law serves as the primary legal instrument regulating all electronic transactions, including the distribution of electronic information related to online gambling. The 2024 amendments further strengthen prohibitions on online gambling and enhance measures to manage illegal content on electronic platforms.

Table 3. Legal Policies on Online Gambling in Indonesia.

Legal Aspects	Indonesian Policies on Online Gambling
Legal Basis	Law No. 1 of 2024 on the Second Amendment to Law No. 11 of 2008 concerning Electronic Information and Transactions Law No. 1 of 2023 on the Criminal Code (New Criminal Code)

Legal Aspects	Indonesian Policies on Online Gambling
Regulation on Online Gambling Distribution	Article 27 paragraph (2) of the ITE Law prohibits any person from intentionally and unlawfully distributing, transmitting, or making accessible electronic information and/or electronic documents containing gambling content. Article 45 paragraph (3) stipulates that violations of Article 27 paragraph (2) are punishable by imprisonment of up to 10 (ten) years and/or a fine of up to IDR 10,000,000,000 (ten billion rupiah).
Sanctions for Persons Engaging in Gambling Activities	Article 426 of the Criminal Code punishes anyone who, without permission, offers or provides opportunities to gamble and makes it a livelihood or participates in gambling businesses: (1) With a maximum imprisonment of 9 years or a maximum fine categorized under Category VI. (2) Additional penalties include the revocation of rights if the offense is committed in a professional capacity.
Sanctions for Gambling Participants	Article 427 of the New Criminal Code imposes a maximum imprisonment of 3 years or a fine up to Category III for any individual who participates in gambling activities without authorization.

The table above shows that the New Criminal Code (KUHP), effective from 2023, provides comprehensive regulations on gambling offences conducted both physically and online, with stricter sanctions for perpetrators, organizers, and participants in illegal gambling. Meanwhile, the Electronic Information and Transactions Law (ITE Law) is the primary legal framework governing electronic transactions, including the distribution of electronic information related to online gambling. Its 2024 amendment further strengthens the prohibition of online gambling and the management of illegal content on electronic platforms, reflecting a heightened regulatory focus on combating digital gambling activities.

Indonesian legal policies on online gambling are comprehensively regulated through several provisions that impose stringent sanctions on illegal gambling organisers, distributors of gambling-related information, and participants in unauthorised gambling activities. Articles in the Electronic Information and Transactions Law and the New Criminal Code reflect the government’s firm commitment to combating online gambling, particularly when conducted without official authorisation. The imposition of severe criminal penalties, including imprisonment and substantial fines, aims to deter public involvement in illegal gambling while giving law enforcement authorities a robust legal framework to address and sanction violations.

3.2. Reconstruction of Ideal Future Law for Online Gambling Criminalization Amid Divergent Domestic Policies

The debate surrounding the risks of gambling and its regulation is inherently complex, involving multiple perspectives. On one hand, the gambling industry tends to frame these risks primarily as issues of individual misuse of gambling products. Proponents argue that many gambling-related problems can be mitigated through education, clear information, and enhanced personal controls by players [26]. From this viewpoint,

the gambling industry is a legitimate commercial entity that provides entertainment and economic opportunities in an orderly, regulated manner; therefore, responsibility for problematic behaviour should not be placed solely on the industry but on individual users [27].

Online gambling, as a form of criminal activity, has emerged as a global phenomenon that poses significant transnational legal challenges. Divergent domestic policies on regulating or criminalizing online gambling create regulatory gaps that offenders can exploit [28]. Therefore, an ideal legal reconstruction is imperative to address these issues, taking into account the complexities of globalization, state sovereignty, and the evolving dynamics of information technology.

1) Regulation of Primary Criminal Sanctions and Supplementary Penalties for Online Gambling Organizers and Operators

Based on a comparative analysis of domestic policies on the criminalisation of online gambling in Germany, Russia, and Indonesia, an ideal future legal framework can be conceptualised by integrating their respective strengths. Germany’s structured licensing system emphasises stringent regulatory oversight, ensuring legal compliance through formal authorisation processes. Russia’s approach, characterised by strict enforcement including site blocking and extraterritorial jurisdiction, highlights the importance of robust punitive measures and cross-border cooperation. Meanwhile, Indonesia’s evolving legal landscape, incorporating both national legislation and technological enforcement mechanisms such as digital monitoring and access blocking, underscores the critical role of adaptive legal instruments in response to technological advancements. Synthesising these approaches suggests that an ideal legal framework should balance clear regulatory standards, stringent enforcement, international collaboration, and technological integration to effectively combat online gambling crimes in complex global and domestic contexts.

a) Policy through the Criminal Gambling Categorization Action Scale for Organizations and Individuals
One policy approach to addressing online gambling issues

is the categorization of gambling offences based on their scale and severity [28]. This policy aims to differentiate the gravity of offences according to the nature and extent of violations committed by organizers or individuals. Such an approach is crucial for establishing a more proportional and equitable sanctioning system. A notable example is the Russian legal framework, which classifies violations by the magnitude of the offence and the parties involved. Implementing a similar categorization system in Indonesia could improve law enforcement effectiveness against online gambling activities.

Following Russia's approach, Indonesia could adopt a similar categorisation policy to clarify how it handles online gambling offences, tailored to local characteristics and legal provisions. This framework may consist of three categories: (1) Light Category (Individuals), characterized by individuals engaging in online gambling without commercial intent (e.g., individuals gambling on illegal websites without involvement or coordination with organisers); (2) Medium Category (Small Groups/Commercial Organizations), involving providers or participants engaging in gambling for commercial purposes or financial gain without state authorisation (e.g., small groups offering unauthorized online betting or collaborating with others for profit); and (3) Severe Category (Organized Groups and Officials), encompassing organized groups or officials who possess the capacity and intent to operate illegal gambling on a large scale (e.g., organized networks running international online gambling or public officials facilitating illegal gambling activities). This categorisation would enable a more nuanced and effective legal response aligned with Indonesia's socio-legal context.

The advantages of implementing a future criminal categorization law for gambling offenses include: (1) enhanced law enforcement effectiveness, as categorization allows for more precise and equitable application of sanctions tailored to the severity of the violation; (2) the establishment of criminal actions based on the scale and actors involved, enabling differentiated penalties between individual offenders and organized groups, as well as between organizers and participants; (3) the incorporation of additional punitive measures, such as income-based fines or community service, which support crime reduction through rehabilitative approaches; and (4) a proportional approach, facilitating the use of sanctions commensurate with the capacity of individuals or groups, thereby strengthening deterrence while avoiding excessive penalties for minor offenses. This framework promotes a balanced, just, and effective response to online gambling crimes.

Categorising criminal gambling laws by the scale of violations and the parties involved is highly effective in differentiating sanctions for organisers and individuals. Adopting a system similar to Russia's can clarify how Indonesia handles online gambling offences. Through a more structured policy framework, Indonesia can improve law enforcement effectiveness against online gambling while mitigating the social impacts of these illegal activities.

b) Policy Through the Imposition of Fines Based on the

Convicted Person's Income

Indonesia currently regulates criminal fines for online gambling offences under Article 45 paragraph (3) of the ITE Law, imposing a fine of up to IDR 10,000,000,000. In contrast, the New Criminal Code does not distinguish between online and conventional gambling and applies fines based on Group III (IDR 50,000,000) and Group IV (IDR 200,000,000) classifications. These differing fine provisions in the ITE Law and the New Criminal Code for online gambling offences reflect divergent approaches in addressing gambling activities, highlighting the regulatory gap between online and conventional gambling enforcement [29].

The new Criminal Code stipulates lower fine categories for conventional gambling offenders, highlighting a misalignment in regulating online gambling, whereas the ITE Law imposes substantially higher fines. However, in many cases, convicted individuals unable to pay fines face imprisonment as a substitute [30]. To harmonize policies, it is crucial to clearly categorize online gambling offences by scale and ensure that fines and sanctions imposed are fair and proportional. Legal provisions governing online gambling require adjustment to better address contemporary challenges and the varying degrees of violations. Therefore, adopting income-based fines calculated over a set period, as practiced in Russia and Germany, is a highly relevant and effective step to combat online gambling in Indonesia. This approach introduces principles of justice and proportionality by aligning fines with both the severity of the offence and the offender's economic capacity.

Indonesia can adopt an income-based fine system similar to those implemented in Russia and Germany, classifying fines according to the severity of the offence: (1) Light category fines corresponding to a working period of 1 to 3 years; (2) Severe category fines aligned with a working period of 3 to 5 years; and (3) Officials or individuals holding official positions fines reflecting a working period of 4 to 5 years. The exact fine amounts should be adjusted in accordance with Indonesia's criminal procedural laws and the country's economic realities to ensure both fairness and effective deterrence.

Implementing an income-based fine system offers several advantages in combating online gambling in Indonesia. First, it ensures sanction proportionality by calculating fines relative to the offender's income, ensuring fair and appropriate penalties. Higher-income offenders face heavier fines, creating a stronger deterrent effect than fixed nominal fines. Second, this system mitigates social inequality by tailoring fines to individuals' economic capacity; for low-income offenders, fines remain affordable yet effective in deterring offences. Third, similar to Russia's approach, Indonesia can categorise online gambling offences as light, moderate, or severe, with corresponding income-based fines aligned with the gravity of the offence. Lastly, income-based fines have the potential to reduce abuse and involvement by organised groups, as those engaged in illegal online gambling operations, especially organised entities and officials, would face substantially higher pen-

alties proportional to their earnings, fostering greater awareness against misuse of authority and participation in illicit activities.

c) Policy through the implementation of Additional Criminal Procedure (Fines and Social Work)

Additional penalties, as implemented in Russia, specifically income-based fines calculated over a defined period and community service, represent a pertinent measure to enhance the enforcement of online gambling laws in Indonesia. To adopt this approach, Indonesia could amend existing regulations within the ITE Law or the revised Criminal Code to include optional additional sanctions such as fines and community service. Courts could impose these penalties alongside primary punishments like imprisonment or compulsory labour, with their application subject to judicial discretion. Higher fines are expected to exert a stronger deterrent effect, particularly against offenders from middle- to upper-income brackets. Furthermore, the collected fines could serve as a supplementary revenue source for the state, which can be allocated toward funding educational initiatives and preventive programs addressing online gambling.

The current ITE Law regulates crimes related to electronic information and transactions, including online gambling (Article 27 paragraph 2) [31]. However, the prescribed sanctions are generally limited to imprisonment and/or fines. Introducing optional additional fines would grant judges the discretion to impose harsher penalties tailored to the offender's circumstances and the severity of the violation, aligning with the principle of proportionality in criminal law. These additional fines could be imposed alongside imprisonment or compulsory labour, allowing for a more varied, effective, and equitable punishment system that better reflects justice [32].

Imposing community service as an additional penalty, ranging from 180 to 240 hours for offenders of illegal online gambling, represents a substantial duration that balances deterrence with the offender's ability to maintain daily activities such as primary employment or education. However, this duration should be calibrated according to the severity of the violation, considering factors such as the volume of transactions, network involvement, or the extent of societal harm caused. Community service not only punishes offenders but also allows them to contribute positively to society through activities like cleaning public facilities, supporting social programs, or engaging in community development efforts. This rehabilitative approach can foster offender awareness of the broader social consequences of their actions, thereby enhancing the overall effectiveness of criminal sanctions against online gambling offences.

Community service offers offenders an opportunity for rehabilitation, in contrast to imprisonment, which often results in social isolation. This reflects a legal approach that emphasises not only punishment but also education. Moreover, community service programs designed with community involvement can raise public awareness of the dangers of online gam-

bling, serving as part of broader educational and crime-prevention campaigns. Replacing imprisonment with community service for certain offences, such as online gambling violations, can reduce the burden on correctional institutions and improve the efficiency of state resource utilisation. However, effective community service requires a robust monitoring system to ensure the sanction is implemented properly and achieves its intended objectives. This oversight may involve government agencies or authorised non-governmental organisations tasked with supervising the community service process.

2) Harmonization of Domestic Policies Among Countries Against Online Gambling

Online gambling is a rapidly growing global phenomenon; however, legal approaches to its regulation vary significantly across countries. These differences in domestic policies influence how states regulate, supervise, and enforce laws related to online gambling. Legal harmonization, an effort to unify or standardized policies and regulations across nations, is crucial to ensure effective law enforcement in cyberspace, which inherently transcends national borders. To achieve an ideal legal reconstruction, political harmonization of domestic policies across countries becomes essential. Consequently, several measures are necessary, including but not limited to:

a) Strengthening international cooperation

Strengthening international cooperation with countries that legalize online gambling is a strategic measure to address the challenges posed by illegal online gambling. Many illicit operators are headquartered in jurisdictions where online gambling is legal but continue to conduct illegal activities in other countries, such as Indonesia. In this context, diplomatic and international relations play a critical role in combating online gambling, particularly when dealing with operators based abroad. Robust international collaboration is essential for effective law enforcement and the dismantling of online gambling networks, thereby safeguarding global security and the welfare of citizens [33].

Countries that legalize online gambling typically implement stringent regulations to govern such activities. Collaborating with these countries can help Indonesia understand their licensing mechanisms, supervision frameworks, and law enforcement practices, which may serve as valuable models for domestic policy development. Such cooperation can also facilitate efforts to trace and prosecute illegal online gambling operators who, while based in jurisdictions where gambling is legal, conduct unauthorized operations targeting Indonesia. Illegal online gambling operators often exploit differing jurisdictions to evade legal action. Therefore, Indonesia can establish extradition agreements with these countries to ensure perpetrators are brought to justice when violating Indonesian law. Furthermore, such cooperation enables the Indonesian government to request partner countries to block access to illegal gambling websites and freeze the assets of operators who infringe upon Indonesia's legal framework.

Strengthening cooperation can also be achieved through information and intelligence exchange. Countries that legalize. Online gambling operators typically maintain registries of licensed operators within their jurisdictions. This exchange may include (1) operator identities and locations, details about site management, including physical addresses and bank accounts; and (2) financial transactions, tracking cash flows derived from illegal online gambling involving Indonesia. Moreover, these countries often possess advanced technologies for monitoring online gambling activities. Consequently, cooperation may also encompass (1) real-time online activity monitoring and technology transfer to assist Indonesia in identifying and blocking illegal gambling sites, and (2) partnerships with technology providers that have collaborated with these countries to develop enhanced surveillance systems for implementation in Indonesia.

b) Implementation of the Principle of Extraterritoriality

The extraterritoriality principle allows a state to enforce its laws against crimes committed beyond its territorial jurisdiction, provided such offences have significant impacts within the state. In the context of cross-border online gambling, this principle is particularly relevant for addressing perpetrators who operate from abroad but affect the nation's citizens or domestic economy. Implementing extraterritorial jurisdiction, supported by bilateral and multilateral agreements, is a crucial step in law enforcement against transnational online gambling offenders. This approach requires adjustments to domestic legislation, stronger international cooperation, and coordinated efforts among countries to tackle the complex challenges posed by globalized digital crime.

The principle of extraterritoriality rests on several key doctrines of international law. First, the active nationality principle grants a state jurisdiction over its nationals regardless of location, allowing a country to prosecute its citizens for online gambling offences abroad. Second, the passive nationality principle empowers a state to protect its residents from crimes committed by foreign nationals, including illegal online gambling activities that affect its population. Third, the protective principle enables a state to take legal action against individuals whose conduct threatens national security or the domestic economy, even if such acts occur beyond its territorial boundaries. Together, these principles form the legal foundation for asserting jurisdiction in cross-border online gambling cases, facilitating the enforcement of domestic laws in an increasingly interconnected digital environment.

Implementing the extraterritoriality principle requires robust support through international agreements to ensure the effectiveness and legitimacy of cross-border law enforcement. This support can take the form of (1) bilateral treaties for the extradition of offenders, which enable countries to prosecute operators of illegal online gambling in the jurisdiction where the crime impacts, such as Indonesia. For example, Indonesia may establish such treaties with countries frequently serving as bases for illegal online gambling operations, including the Philippines and Malta. Complementing these treaties, mutual

legal assistance agreements are essential to allow access to data and evidence held by foreign jurisdictions relevant to illegal online gambling activities. (2) Multilateral agreements are also crucial, enabling multiple countries to collaborate in developing global protocols aimed at collectively combating illegal online gambling. Together, these legal instruments form a comprehensive international framework that enhances coordinated enforcement and judicial cooperation against cross-border online gambling crimes.

International cooperation based on the principle of extraterritoriality must encompass a broad spectrum of activities, ranging from intelligence sharing to coordinated legal enforcement actions. By implementing mutual legal assistance treaties, countries can strengthen collaboration among law enforcement agencies and ensure a more integrated response to illegal gambling operations. Such agreements facilitate the exchange of critical information and resources, enabling synchronized crackdowns on cross-border illicit gambling activities. Proactive international cooperation is essential to prevent suspects involved in online gambling crimes from evading justice through release or disproportionately lenient sentencing, thereby increasing prosecution success rates and reinforcing the integrity of regional legal systems [34].

3) Technological Approaches in Law Enforcement Against Online Gambling Amid Divergent Domestic Policies

Technology is a crucial element in legal reconstruction efforts to address online gambling amid divergent domestic policies across countries. Several technological approaches can effectively strengthen law enforcement in this domain. (1) The implementation of digital monitoring systems enables the detection of illegal online gambling activities by tracking digital transactions in real time. (2) The blocking of unauthorised gambling websites and applications can be facilitated through cooperation with internet service providers, ensuring restricted access to illicit platforms. (3) The development of artificial intelligence (AI) algorithms plays a vital role by analysing suspicious transaction patterns and issuing early warnings to preempt unlawful activities. Together, these technological interventions provide a comprehensive and adaptive framework to enhance regulatory effectiveness and address the complex challenges posed by online gambling.

First, developing digital monitoring systems is critical to improving online gambling law enforcement. Technological advancements enable a more integrated surveillance framework through digital monitoring, allowing authorities to detect and trace illegal online gambling activities with greater precision. By designing systems that identify suspicious digital transactions, law enforcement agencies can proactively target illicit operations. This approach involves integrating data from banks, fintech companies, and payment service providers, enabling real-time analysis and flagging of anomalous financial activities indicative of online gambling. Such a system not only strengthens regulatory oversight but also facilitates preventive measures by providing early warnings and actionable intelligence.

Second, blocking websites and applications is a common regulatory measure to restrict access to, or financial transactions with, illegal gambling platforms, alongside transaction monitoring and technologies that detect VPN usage and domain obfuscation to enhance the overall effectiveness of regulatory interventions.

Third, developing artificial intelligence (AI)-based algorithms to identify high-risk online gamblers is a strategic approach to addressing the challenges of illegal online gambling, particularly because AI can detect behavioural patterns imperceptible to conventional monitoring systems [35]. By leveraging historical data and real-time user behaviour such as login frequency, betting patterns, and financial transaction dynamics, AI can detect early signs of suspicious activity indicative of illegal online gambling. Its early-warning capacity offers a preventive advantage, enabling authorities to intervene before such activities escalate. However, AI effectiveness depends on data quality, shifting behavioural patterns, and the algorithm's adaptability to diverse legal and socio-cultural contexts. Hence, ongoing development and performance evaluation are essential to ensure that AI remains accurate, contextually relevant, and legally robust in supporting digital law enforcement.

AI in the surveillance and enforcement of laws against illegal online gambling has considerable potential to enhance the effectiveness of digital crime detection and prevention. AI enables rapid, efficient analysis of large-scale transactional data, helping identify suspicious patterns such as repeated small-value transfers or irregular cross-border transactions that may elude conventional monitoring methods. Machine learning (ML), a subset of AI, allows systems to continuously learn from historical data and improve their accuracy in detecting anomalies or trends indicative of legal violations. Moreover, integrating Natural Language Processing (NLP) extends analytical capabilities beyond financial transactions to include communication patterns within online gambling platforms, such as forums and chatrooms, by detecting keywords and phrases associated with illicit activities. Incorporating AI technologies thus fosters a more adaptive and proactive surveillance approach while strengthening cross-jurisdictional law enforcement capabilities in a comprehensive and responsive manner.

4. Conclusions

Online gambling is a significant global legal issue that has developed rapidly, requiring adaptive policy responses from individual countries. Although the overarching objective to control and eradicate illegal gambling practices is consistent across jurisdictions, domestic policies are shaped by differences in culture, legal systems, and socio-political contexts. Germany's approach to online gambling is characterized by a

structured regulatory framework emphasizing strict state licensing. In contrast, Russia adopts a more repressive strategy, blocking illegal websites and applying extraterritorial principles to enforce cross-border law. Meanwhile, Indonesia places greater emphasis on national legal instruments such as the Information and Electronic Transactions Law (UU ITE) and the newly revised Criminal Code (KUHP), while progressively integrating technological measures, including digital monitoring and blocking access to illegal gambling platforms. These divergences reflect the complexity of addressing online gambling and underscore the need for a comprehensive, contextual legal reconstruction that aligns with both global challenges and local dynamics.

An ideal future legal reconstruction for Indonesia in addressing the criminalization of online gambling amidst differing domestic policies across countries should encompass a comprehensive and adaptive approach. First, policies must clearly regulate principal and additional criminal sanctions for both organisers and participants of online gambling, incorporating a graduated classification of offences (minor, moderate, severe), proportional fines based on offenders' income, and supplementary penalties such as fines and community service. Second, countries should strengthen domestic policy harmonisation through international cooperation and apply extraterritorial principles to combat cross-border crimes effectively. Third, law enforcement should integrate technological approaches by developing digital monitoring systems, engaging private-sector participation to block illegal websites and applications, and advancing artificial intelligence (AI) capabilities to detect suspicious transaction patterns and provide early warnings.

Abbreviations

AI	Artificial Intelligence
NLP	Natural Language Processing
ML	Machine Learning
VPNs	Virtual Private Networks
ISPs	Internet Service Providers
ITE Law	Electronic Information and Transactions Law

Author Contributions

Muhammad Ali Nurhidayatullah: Conceptualisation, Resources, Validation, Writing – original draft, Writing – review & editing

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Conflicts of Interest

The authors declare no conflicts of interest.

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