

Money Laundering, Labor Exploitation, and Human Trafficking within the Online Gambling Network: An Interdisciplinary Approach to Transnational Crime in Southeast Asia

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Abstract

The online gambling industry in Southeast Asia has become a strategic platform for transnational criminal syndicates to commit crimes such as money laundering, labor exploitation, and human trafficking. This study uses an interdisciplinary approach—including legal analysis, criminology, and social studies—to examine the involvement of Indonesian citizens (WNI) as the main victims in exploitation networks operating in countries such as Cambodia, Myanmar, and Malaysia. Although most of the literature and discussions reflect the broader Southeast Asian regional context, this research focuses specifically on the situation of Indonesian migrant workers. The study highlights the criminal methods employed by syndicates, regulatory weaknesses at both national and international levels, and the challenges facing effective cross-border cooperation. In addition, important aspects of increasing the capacity of law enforcement, especially in tracking digital transactions and protecting victims, are also discussed. The findings show that exploitation of Indonesian citizens occurs systematically and involves various actors across jurisdictions. Therefore, a comprehensive legal approach, stronger regional cooperation under ASEAN, and policies for the protection of migrant workers based on human rights are needed. The policy implications of this study focus on concrete steps that the Indonesian government can take to effectively respond to the complexity of this crime.

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Introduction

Online gambling has rapidly evolved into a global phenomenon, generating significant impacts on vulnerable populations, particularly women and children. Women are often more susceptible to gambling-related problems due to unique emotional and social factors, such as seeking an escape from stress and social isolation, which they tend to experience more

frequently than men.¹ Children and adolescents are also increasingly vulnerable targets, as they are more easily exposed and influenced by aggressive online gambling advertisements, which are strategically designed to infiltrate social media platforms they use daily.² Early exposure to online gambling may lead to the development of addictive behaviors in children, potentially resulting in long-term mental and social health consequences.³

Online gambling can also exacerbate household financial instability, especially in families already struggling economically, as women often bear additional financial burdens caused by their partner's or their own gambling behavior.⁴ Women engaged in online gambling are further burdened by greater social stigma, which deters them from seeking help and exacerbates the negative impacts they endure. For children, involvement in online gambling may interfere with their academic and⁵ or children, involvement in online gambling may interfere with their academic and social development, as time meant for learning or play is frequently consumed by gambling activities.⁶ Ultimately, children raised in families affected by online gambling face a higher risk of adopting gambling behaviors in adulthood, perpetuating a cycle of harm across generations.⁷ Overall, online gambling inflicts deep and multifaceted harm on vulnerable groups, with interrelated social, economic, and health consequences.

The exploitation of Indonesian migrant workers (WNI) within the online gambling industry in Cambodia and Myanmar has emerged as a serious concern in recent years. Many Indonesians are lured by promises of high-paying jobs abroad, only to face drastically different working conditions upon arrival—marked by excessive working hours, extreme pressure to meet unrealistic targets, and threats of violence for non-compliance.⁸ In Cambodia, the illegal online gambling industry has flourished by exploiting regulatory loopholes and weak law enforcement, subjecting migrant workers—including Indonesians—to forced labor and the confiscation of personal documents.⁹ In Myanmar, particularly in border areas controlled by armed groups, the industry often operates beyond the reach of the state, turning migrant workers into easy targets for exploitation under the constant threat of physical and psychological

¹ Nerilee Hing et al., "Risk Factors for Gambling Problems: An Analysis by Gender," *Journal of Gambling Studies* 32, no. 2 (2016): 511–34, <https://doi.org/10.1007/s10899-015-9548-8>.

² Daniel L. King and Paul H. Delfabbro, *Internet Gaming Disorder: Theory, Assessment, Treatment, and Prevention* (UK & USA: Elsevier, 2018), 181, <https://doi.org/10.1016/c2016-0-04107-4>.

³ Jeffrey L. Derevensky, Rina Gupta, and Giuseppe Della Cioppa, "A Developmental Perspective of Gambling Behavior in Children and Adolescents," *Journal of Gambling Studies* 12, no. 1 (1996): 49–66, <https://doi.org/10.1007/bf01533189>.

⁴ Nicki Dowling, David Smith, and Trang Thomas, "The Family Functioning of Female Pathological Gamblers," *International Journal of Mental Health and Addiction* 7, no. 1 (2009): 29–44, <https://doi.org/10.1007/s11469-007-9126-0>.

⁵ Louise Holdsworth, Elaine Nuske, and Helen Breen, "All Mixed Up Together: Women's Experiences of Problem Gambling, Comorbidity and Co-Occurring Complex Needs," *International Journal of Mental Health and Addiction* 11, no. 3 (2013): 325, <https://doi.org/10.1007/s11469-012-9415-0>.

⁶ Daniel King, Paul Delfabbro, and Mark Griffiths, "The Convergence of Gambling and Digital Media: Implications for Gambling in Young People," *Journal of Gambling Studies* 26, no. 2 (2010): 175–87, <https://doi.org/10.1007/s10899-009-9153-9>.

⁷ Nerilee Hing et al., "Gambling Responsibly: Who Does It and To What End?," *Journal of Gambling Studies* 33, no. 1 (2017): 149–65, <https://doi.org/10.1007/s10899-016-9615-9>.

⁸ Lindsey Kennedy and Paul Southern, "Inside Southeast Asia's Casino Scam Archipelago," *The Diplomat*, last modified 2022, https://www.viet-studies.net/kinhte/SEACasinoScams_Diplomat.pdf; Jason Tower and Priscilla Clapp, "Myanmar's Casino Cities: The Role of China and Transnational Criminal Networks," United States Institute of Peace, last modified 2020, <https://www.usip.org/publications/2020/07/myanmars-casino-cities-role-china-and-transnational-criminal-networks>.

⁹ Naparat Kranrattanasuit, *ASEAN and Human Trafficking: Case Studies of Cambodia, Thailand, and Vietnam*, vol. 109 (Leiden: Martinus Nijhoff Publishers, 2014), 90.

violence.¹⁰ These two countries have become major destinations for human trafficking networks that ensnare Indonesian citizens into the online gambling industry, where they are not only economically exploited but also frequently subjected to torture and captivity.¹¹ This situation illustrates the urgent need for stronger interventions by the Indonesian government and the international community to protect its citizens from such threats.

Online gambling in Southeast Asia has become a key mechanism for transnational crime syndicates to conduct various illicit activities, including money laundering, labor exploitation, and human trafficking. This phenomenon is facilitated by weak regulations and inadequate law enforcement in several countries in the region—such as Cambodia, Myanmar, and Malaysia—which effectively serve as fertile grounds for the operations of international criminal networks. Their modus operandi often involves labor fraud, where migrant workers—especially from Indonesia—are enticed with lucrative overseas job offers, only to be forced into inhumane working conditions as online gambling operators. Secondary sources reveal that these workers endure extremely exploitative conditions, including long working hours without proper compensation, threats of physical violence, and confinement that restricts their freedom.¹²

Moreover, online gambling has become a powerful tool for syndicates to launder proceeds from other crimes, including drug trafficking and corruption. Financial transactions conducted on gambling platforms—particularly those involving cryptocurrencies—offer high levels of anonymity, making them difficult for law enforcement authorities to trace.¹³ This allows criminal networks to obscure the origins of their funds through complex, multi-jurisdictional transaction chains. Data from the United States Department of State shows that in Cambodia, for instance, the online gambling industry has been linked to numerous cases of human trafficking and money laundering, where migrant workers are exploited to facilitate these illicit operations.¹⁴ In Myanmar's border regions—especially areas like Myawaddy—numerous gambling complexes are reportedly run by armed groups¹⁵ further endangering migrant workers, who risk violent retaliation if they attempt to escape or report the crimes.

The vulnerability of these migrant workers is often exacerbated by rampant corruption in the destination countries, where local officials are complicit in shielding the operations of online gambling syndicates for personal gain. This corruption creates significant barriers to law enforcement efforts, which not only require coordination among domestic institutions but also demand robust international cooperation. Although ASEAN has adopted the ASEAN Convention Against Trafficking in Persons, Especially Women and Children (ACTIP), its implementation is frequently hindered by the principle of non-intervention and inconsistent commitments among member states.¹⁶

¹⁰ Abraham D. Sofaer, "United States Department of State: Memorandum from Judge A. D. Sofaer, Legal Adviser," in *Maritime Terrorism and International Law*, ed. Natalino Ronzitti (Leiden: Brill | Nijhoff, 2024), 171–73, https://doi.org/10.1163/9789004640146_018.

¹¹ Lisa Denney et al., "Addressing Exploitation of Labour Migrants in Southeast Asia: Beyond a Counter-Trafficking Criminal Justice Response," *ODIGlobal*, 2023, http://cdn-odi-production.s3.amazonaws.com/media/documents/Thematic_brief_2_Final.pdf.

¹² Lindsey Kennedy and Nathan Paul Southern, "Modern Slavery in the Mekong's Casinos," *Global Initiative*, July 25, 2022, <https://globalinitiative.net/analysis/modern-slavery-mekong-casinos/>.

¹³ ISP Myanmar, "Drowning in the Vicious Cycle of Gambling," *ISP Insight Email*, no. 22 (2023): 1–12.

¹⁴ Department of State US, "Office to Monitor and Combat Trafficking In Persons: Human Trafficking and Cyber Scam Operations," Department of State US, last modified June 2023, www.state.gov.

¹⁵ La Seng Aung, Seo Ah Hong, and Sariyamon Tiraphat, "A Descriptive Study of Gambling Practices and Problem Gambling among Internal Migrants in Muse, Northern Shan, Myanmar," *Nagoya Journal of Medical Science* 81, no. 1 (2019): 133–41, <https://doi.org/10.18999/nagjms.81.1.133>.

¹⁶ ASEAN, "ASEAN-China Joint Statement on Combating Telecommunication Network Fraud and Online Gambling," ASEAN Main Portal, last modified October 10, 2024, <https://asean.org/asean-china-joint-statement-on-combating-telecommunication-network-fraud-and-online-gambling/>.

The socio-economic impact of such exploitation is severe. According to reports compiled by the U.S. Department of State, exploited migrant workers in online gambling operations suffer not only physical and psychological harm, but also face extreme economic hardship as their wages are often withheld and their identity documents are seized by criminal syndicates. These crimes also have broader implications for social and economic stability in the region, as laundered funds are frequently used to finance other criminal enterprises such as arms trafficking and narcotics. Therefore, a more coordinated and assertive approach is required to address this issue, including enhanced international cooperation, stronger regulatory frameworks, and advanced law enforcement training in digital forensic technologies to trace illicit financial flows. Table 1 illustrates the patterns of exploitation and money laundering within the online gambling industry in Southeast Asia.

Table 1. Patterns of Exploitation and Money Laundering in the Online Gambling Industry in Southeast Asia

Country	Modus Operandi	Types of Exploitation	Impact
Cambodia ¹⁷	Recruitment of migrant workers for online gambling operations	Long working hours, confinement, physical abuse	Money laundering, human trafficking
Myanmar ¹⁸	Gambling complexes in border areas	Forced labor under armed threat	Funding of armed groups
Malaysia ¹⁹	Online gambling call centers	Economic and physical exploitation	Corruption of local officials, money laundering
Indonesia ²⁰	Recruitment through fake job advertisements	Labor fraud targeting migrant workers	Financial losses for victims' families

Considering the complexity and interconnection between money laundering, online gambling, and the exploitation of migrant labor in Southeast Asia, a holistic, human rights-based policy framework is urgently needed. This response must involve stronger regional and international cooperation, including regulatory harmonization and enhanced law enforcement capacity, to ensure justice for victims and disrupt the increasingly sophisticated operations of criminal syndicates.

Online gambling is intricately linked to money laundering in the context of transnational crime, as the financial transactions it facilitates are often used to obscure the origins of illicit funds. Transnational crimes such as drug trafficking, human trafficking, and corruption frequently exploit online gambling platforms for money laundering, owing to the anonymous

¹⁷ United States Department of State, "2023 Trafficking in Persons Report: Cambodia," United States Department of State, last modified 2023, <https://www.state.gov/reports/2023-trafficking-in-persons-report/cambodia/>.

¹⁸ Aung, Hong, and Tiraphat, "A Descriptive Study of Gambling Practices and Problem Gambling among Internal Migrants in Muse, Northern Shan, Myanmar," 137.

¹⁹ Guru Dhillon et al., "Online Gambling in Malaysia: A Legal Analysis," *Pertanika Journal of Social Sciences and Humanities* 29, no. 1 (March 2021): 210, <https://doi.org/10.47836/pjssh.29.1.12>.

²⁰ H. Ramadhani, M. Fauzi, and A. M. Tiga, "Law Enforcement in Eradicating Online Gambling Sites in Indonesia," *Lex Suprema Journal* 2, no. 2 (2020): 74.

and multi-jurisdictional nature of such transactions.²¹ Online gambling presents an ideal channel for laundering illegal proceeds due to the ease of transferring funds through multiple accounts, digital payment platforms, and untraceable cryptocurrencies.²² Moreover, organized criminal networks use online gambling to integrate illicit funds into the legal economy, capitalizing on the complexities of international law and the weak cross-border enforcement mechanisms.²³ In many instances, the proceeds from online gambling are transferred to bank accounts in jurisdictions with lax banking regulations and subsequently reintegrated into the originating country as legitimate earnings—making detection and enforcement increasingly difficult.²⁴ This connection illustrates that online gambling functions not only as a form of entertainment but also as a strategic tool for transnational criminal networks to conduct illicit financial operations, posing a significant challenge to global law enforcement efforts.

The legal frameworks applicable to the perpetrators of labor exploitation, human trafficking, and money laundering within the online gambling industry are rooted in an interrelated set of international and national legal instruments aimed at combating these transnational crimes.²⁵ At the international level, one of the primary legal instruments is the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children (Palermo Protocol), adopted as part of the United Nations Convention against Transnational Organized Crime.²⁶ This protocol provides definitions and legal frameworks for the prevention, prosecution, and protection of victims of trafficking, emphasizing the necessity of international cooperation. The United Nations Convention against Corruption (UNCAC) is also highly relevant, particularly as many of these crimes involve the complicity or direct participation of corrupt officials in facilitating criminal syndicate operations. Regionally, the ASEAN Convention Against Trafficking in Persons, Especially Women and Children (ACTIP) strengthens the commitment of Southeast Asian nations to collaborate in preventing human trafficking and protecting victims, offering provisions tailored to the regional context.²⁷

At the national level, Southeast Asian countries have enacted legal provisions designed to target crimes associated with the online gambling industry. In Indonesia, for instance, Law No. 21 of 2007 on the Eradication of the Crime of Human Trafficking (UU TPPO) provides a robust legal framework to prosecute traffickers. In addition, Law No. 8 of 2010 on the Prevention and Eradication of the Crime of Money Laundering (UU TPPU) addresses money laundering crimes and grants law enforcement the authority to seize assets linked to illegal activities (Fauzi, 2021). In Malaysia, the Anti-Trafficking in Persons and Anti-Smuggling of Migrants Act 2007 (ATIPSOM) serves as a key legal basis for prosecuting human trafficking offenses, while the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act

²¹ Diogo Machado Teixeira da Mota Dá Mesquita, “A Digital Euro’s Relationship with Data Protection, Anti-Money Laundering and Combating the Financing of Terrorism” (Master’s thesis, Lisbon, Universidade Católica Portuguesa, 2022), 76, <https://ciencia.ucp.pt/en/studentTheses/a-digital-euros-relationship-with-data-protection-anti-money-laun>.

²² Shousheng Li, “Research on the Application of Criminal Law to Cross-Border Online Gambling in China,” *Communications in Humanities Research* 33, no. 1 (2024): 106–15, <https://doi.org/10.54254/2753-7064/33/20240059>.

²³ Graham Brooks, “Online Gambling and Money Laundering: ‘Views from the Inside,’” *Journal of Money Laundering Control* 15, no. 3 (2012): 310, <https://doi.org/10.1108/13685201211238052>.

²⁴ Majid Yar, “Transnational Governance and Cybercrime Control: Dilemmas, Developments and Emerging Research Agendas,” in *A Research Agenda for Global Crime*, ed. Tim Hall and Vincenzo Scalia (UK & USA: Edward Elgar Publishing, 2019), 97, <https://doi.org/10.4337/9781786438676.00012>.

²⁵ Catherine Renshaw, “Human Trafficking in Southeast Asia: Uncovering the Dynamics of State Commitment and Compliance,” *Michigan Journal of International Law* 37 (2016): 611.

²⁶ I. Nelson Rose and Martin D. Owens, “Regulation of Online Gambling Outside the United States,” *Internet Gaming Law Second Edition* (2009): 157, <https://doi.org/10.1089/9781934854006.157>.

²⁷ Gemala Hapsari, Fahmi Sidiq, and Sani Sufyan Bature, “Law Enforcement Efforts by the Police in Eradicate Action Criminal Gambling on Line,” *International Journal of Humanities, Law, and Politics* 1, no. 4 (2024): 86, <https://doi.org/10.46336/ijhlp.v1i4.52>.

2001 (AMLA) governs money laundering offenses and empowers authorities to trace and confiscate criminal assets.²⁸

Additionally, national penal codes targeting illegal gambling often form the legal basis for prosecuting actors in the online gambling industry. For example, in Thailand, Section 12 of the Gambling Act 1935 provides legal grounds for punishing all forms of illegal gambling, including online gambling, which is frequently linked to money laundering and labor exploitation.²⁹ These countries have also adopted supplementary regulations aimed at tackling specific aspects of these crimes, such as laws governing banking, telecommunications, and information technology—sectors commonly exploited by criminal syndicates to obscure financial trails.

Despite the availability of these legal frameworks, enforcing them remains a significant challenge. Transnational crimes such as labor exploitation, human trafficking, and money laundering require close international cooperation and effective coordination among law enforcement agencies across jurisdictions.³⁰ However, gaps often exist between legal provisions and state capacity for enforcement—particularly in countries with limited law enforcement resources or high levels of corruption.³¹ Criminal syndicates involved in the online gambling industry tend to be highly organized and adept at exploiting legal loopholes and the lack of coordination between states to evade prosecution. Thus, although legal tools are available to prosecute offenders, the success of efforts to combat these crimes depends heavily on improving law enforcement capacity, addressing corruption, reforming regulations, and strengthening international and regional cooperation. Recent research by Zan and Kyaw Min (2025)³² highlights how the expansion of illegal online gambling in Myanmar has become a central mechanism for syndicates to commit transnational crimes such as money laundering and human trafficking—incorporating elements of cybercrime, document confiscation, and victim coercion. Further, Runturambi and Arifin (2025)³³ explore the phenomenon of “hybrid crimes” combining online fraud with the exploitation of Indonesian migrant workers through forced labor and confinement in online gambling centers. Meanwhile, Langdale (2023)³⁴ in a report for the Asian Racing Federation, demonstrates that the illicit online betting market in the Mekong region has become a vehicle for money laundering and cross-border corruption. Complementing these findings, Chen et al. (2023),³⁵ in *Telematics and Informatics* examine the

²⁸ Antonius P. S. Wibowo et al., *Penanggulangan Tindak Pidana Perdagangan Orang: Kajian Hukum Dalam perspektif Nasional dan Internasional* (Jakarta: Penerbit Universitas Katolik Indonesia Atma Jaya, 2020), 12.

²⁹ Zul Imran Ahmad, Mohd Azul Mohamad Salleh, and Normah Mustaffa, “Preventive Measures in Problematic Gaming in Asia: A Systematic Literature Review,” *Jurnal Komunikasi: Malaysian Journal of Communication* 39, no. 2 (2023): 140, <https://doi.org/10.17576/jkmjc-2023-3902-08>.

³⁰ Libo Wang, “‘Broken Link’ Southeast Asian Money Laundering Channel, Strengthening AML Compliance Management,” *International Journal of Management and Education in Human Development* 1, no. 4 (2023): 159–66.

³¹ Emka Farah Mumtaz, Safendri Komara Ragamustari, and Fajar Bambang Hirawan, “The Impact of the E-Sport Curriculum Toward Online Game Addiction,” *Tazkiya Journal of Psychology* 9, no. 1 (2021): 29–39.

³² Thant Thura Zan and Soe Thaw Tar Kyaw Min, “Cybercrimes and the Illicit Financial Flows in Myanmar,” *Journal of Academics Stand Against Poverty* 6, no. 1 (2025): 43–69, <https://doi.org/10.5281/zenodo.15467435>.

³³ Arthur Josias Simon Runturambi and Ridwan Arifin, “New Patterns and Trends of Migration: Hybrid-Crimes among Indonesian Migrant Workers in Southeast Asia,” *Regional Science Policy & Practice* 17, no. 10 (2025): 44, <https://doi.org/10.1016/j.rspp.2025.100215>.

³⁴ John Langdale, “Transnational Crime, Money Laundering and Illegal Online Betting in Southeast Asia.” *Asian Racing* 9, no. 1 (2023): 1–15.

³⁵ Hongliang Chen, Yunsha Pu, and David Atkin, “Migration Stress, Risky Internet Uses, and Scam Victimization: An Empirical Study among Chinese Migrant Workers,” *Telematics and Informatics* 83 (2023): 332, <https://doi.org/10.1016/j.tele.2023.102022>.

psychological and social vulnerabilities of migrants to online fraud, revealing the link between migration-related stress and victimization in digital criminal schemes.

Additionally, a criminal law study by Li (2024)³⁶ examines how cross-border online gambling has evolved into a component of complex organized crime networks, particularly in East and Southeast Asia. Li underscores the hierarchical structure and systematic role distribution within these criminal enterprises, along with their use of digital technologies to conceal illegal activities such as money laundering and forced recruitment. Li argues that fragmented national regulations are no longer adequate to confront these challenges and calls for comprehensive criminal law reforms that explicitly criminalize cross-border online gambling and reinforce international cooperation in financial tracking and extradition. These findings reinforce the argument that online gambling is a critical element within the ecosystem of transnational crime, demanding a more systemic and integrated legal response. This study differs from previous research that primarily focused on the impacts of online gambling on vulnerable groups such as women and children. While online gambling has been examined from mental health, social, and economic perspectives, limited attention has been paid to the exploitation of labor—particularly involving Indonesian citizens—in this sector. To date, very few studies have explored how Indonesian nationals are recruited, transported, and coerced into inhumane working conditions within Southeast Asia’s online gambling operations. This research gap is especially concerning given the growing number of transnational labor exploitation cases involving Indonesian workers. Therefore, this study aims to address that gap by documenting exploitation practices and analyzing labor dynamics in the online gambling industry. By taking this approach, the study seeks to broaden the understanding of the darker dimensions of the digital economy and contribute meaningfully to the development of more comprehensive migrant labor protection policies.

This research employs a socio-legal method to analyze the exploitation of Indonesian labor in the online gambling industry across Southeast Asia, specifically in Cambodia, Myanmar, Malaysia, and Indonesia. The socio-legal approach³⁷ allows the researcher to examine law not merely as a set of formal rules but within the broader social, cultural, and economic contexts in which it is applied. In this context, the study explores how regulation—or the lack thereof—in these countries affects the vulnerability of Indonesian workers to exploitation. It also investigates the interaction between legal norms and social practices, including how both formal and informal legal mechanisms are employed by actors in the online gambling industry to recruit and control labor. As such, the socio-legal method provides a comprehensive framework for understanding the relationship between legal norms, power structures, and the socio-economic conditions shaping the experiences of Indonesian labor in this sector.

Results and Discussion

To comprehend the complexity of organized crime operating through the online gambling industry, this discussion is structured into five main sections. First, it examines the socio-economic impact of the online gambling industry on vulnerable groups, including migrant workers who become targets of exploitation and labor fraud. Second, it outlines the modus operandi of organized crime, including recruitment techniques, victim control, and how syndicates evade legal detection through cross-border digital systems. Third, it specifically discusses how the exploitation of migrant workers, including Indonesian nationals, takes place in the form of forced labor, confinement, and systematic human rights violations. Fourth, it explores legal dimensions and regulatory weaknesses at both national and international levels

³⁶ Li, “Research on the Application of Criminal Law to Cross-Border Online Gambling in China.”

³⁷ Sulistyowati Irianto et al., “Kajian Sosio-Legal (Seri Unsur-Unsur Penyusun Bangunan Negara Hukum),” UB, last modified 2012, 34, <http://ikuswahyono.lecture.ub.ac.id/files/2015/10/bbrl-socio-legal-studies-final.pdf>.

that result in a serious gap between existing legal norms and the capacity of states to enforce them effectively. Finally, the discussion highlights the importance of international cooperation and law enforcement capacity building as key strategies to address this phenomenon, along with policy recommendations grounded in interdisciplinary and human rights-based approaches.

Socio-Economic Impact of Online Gambling on Vulnerable Communities

Online gambling has caused significant socio-economic consequences for vulnerable groups, particularly women, children, and low-income families. Studies show that women are more likely to experience gambling-related problems that negatively impact their emotional and financial well-being. This is often exacerbated by social conditions that isolate them from support networks, making them more susceptible to the destructive effects of gambling.³⁸ Children and adolescents exposed to online gambling demonstrate increased risks of behavioral disorders and early addiction,³⁹ academic performance and future psychosocial well-being.⁴⁰ Low-income families are particularly impacted as limited financial resources are diverted into gambling, deepening poverty and increasing household economic instability.⁴¹ Moreover, online gambling is often accompanied by other social issues such as domestic violence and rising debt, which further worsen the conditions of vulnerable populations.⁴² Research also indicates that these socio-economic impacts extend beyond the individuals who gamble, affecting family members and communities, creating a cycle of poverty and vulnerability that is difficult to break.⁴³ Thus, online gambling is not merely an individual issue but a complex social problem with far-reaching implications for community well-being.

Previous research has consistently demonstrated that online gambling has profound negative impacts on women and children, who are among the most vulnerable to social and psychological harm.⁴⁴ For women, online gambling often serves as a coping mechanism for emotional difficulties in daily life, such as work-related stress, financial pressure, or domestic violence. Women are more likely to gamble in secrecy, exacerbating their social isolation and limiting access to social support and mental health services.⁴⁵ This creates a dangerous cycle that deepens addiction and increases the risk of depression, anxiety disorders, and other mental health issues.⁴⁶ Research by Gainsbury et al.⁴⁷ also shows that women engaged in online

³⁸ Simone McCarthy et al., "Women and Gambling-Related Harm: A Narrative Literature Review and Implications for Research, Policy, and Practice," *Harm Reduction Journal* 16, no. 1 (2019): 18, <https://doi.org/10.1186/s12954-019-0284-8>.

³⁹ Dika Sahputra et al., "Dampak Judi Online Terhadap Kalangan Remaja (Studi Kasus Tebing Tinggi)," *Islamic Counseling: Jurnal Bimbingan Konseling Islam* 6, no. 2 (2022): 139, <https://doi.org/10.29240/jbk.v6i2.3866>.

⁴⁰ King and Delfabbro, *Internet Gaming Disorder: Theory, Assessment, Treatment, and Prevention*, 104.

⁴¹ Natale Canale et al., "The Efficacy of a Web-Based Gambling Intervention Program for High School Students: A Preliminary Randomized Study," *Computers in Human Behavior* 55 (2016): 946–54, <https://doi.org/10.1016/j.chb.2015.10.012>.

⁴² Nerilee Hing et al., "The Stigma of Problem Gambling: Causes, Characteristics and Consequences," *Victoria, Australia: Victorian Responsible Gambling Foundation*, 2015, 849, <https://acquire.cqu.edu.au/ndownloader/files/25791374>.

⁴³ Heather Wardle et al., *Measuring Gambling-Related Harms: A Framework for Action* (Birmingham, UK: Gambling Commission, Birmingham, UK, 2018), 810, <https://eprints.gla.ac.uk/239102/>.

⁴⁴ Roberta Boughton and Olesya Falenchuk, "Vulnerability and Comorbidity Factors of Female Problem Gambling," *Journal of Gambling Studies* 23, no. 3 (June 2007): 328, <https://doi.org/10.1007/s10899-007-9056-6>; Hing et al., "Risk Factors for Gambling Problems: An Analysis by Gender," 2140.

⁴⁵ McCarthy et al., "Women and Gambling-Related Harm."

⁴⁶ Holdsworth, Nuske, and Breen, "All Mixed Up Together."

⁴⁷ Sally M. Gainsbury et al., "The Prevalence and Determinants of Problem Gambling in Australia: Assessing the Impact of Interactive Gambling and New Technologies," *Psychology of Addictive Behaviors* 28, no. 3 (2014): 769–79, <https://doi.org/10.1037/a0036207>.

gambling have high rates of comorbidity with other disorders, such as substance abuse and eating disorders, further compounding the negative health impacts.

On the other hand, children exposed to online gambling—either directly or indirectly—also face serious consequences. Children whose parents gamble online often experience emotional and physical neglect, which can negatively affect their psychosocial development.⁴⁸ Studies show that these children are at higher risk of developing addictive behaviors later in life, particularly because they internalize gambling as a normal response to stress or financial difficulties.⁴⁹ Furthermore, research by Pitt et al.⁵⁰ reveals that exposure to online gambling through advertisements or games with gambling elements can distort children's perceptions of gambling risks and benefits, increasing the likelihood of future involvement. This impact is compounded by social environments that promote gambling as a normal recreational activity, often accompanied by inadequate supervision and education about its dangers.⁵¹

Research further shows that women and children involved in online gambling often suffer severe economic consequences. Women who gamble tend to spend more on luck-based games, which carry higher odds of losing, increasing their financial vulnerability.⁵² This often leads to burdensome debt and diminished quality of life.⁵³ Meanwhile, children who begin gambling at a young age are more likely to face financial difficulties in adulthood, especially if they develop uncontrolled gambling habits.⁵⁴ These factors suggest that the impact of online gambling extends beyond the individual gambler, affecting families and communities as a whole.⁵⁵

Studies also highlight gender differences in gambling experiences, where women are more likely to engage in luck-based gambling like bingo or slot machines—forms more closely associated with negative outcomes compared to skill-based games.⁵⁶ This reflects a greater susceptibility to financial and emotional harm. Additionally, children and adolescents involved in online gambling frequently develop impulsive behavioral patterns that negatively affect their academic and social development.⁵⁷ Thus, the impact of online gambling on women and

⁴⁸ Julie Vachon et al., “Adolescent Gambling: Relationships with Parent Gambling and Parenting Practices,” *Psychology of Addictive Behaviors* 18, no. 4 (2004): 398–401, <https://doi.org/10.1037/0893-164X.18.4.398>.

⁴⁹ Georgios D. Floros et al., “Adolescent Online Gambling: The Impact of Parental Practices and Correlates with Online Activities,” *Journal of Gambling Studies* 29, no. 1 (2013): 135, <https://doi.org/10.1007/s10899-011-9291-8>.

⁵⁰ Hannah Pitt et al., “Factors that Influence Children’s Gambling Attitudes and Consumption Intentions: Lessons for Gambling Harm Prevention Research, Policies and Advocacy Strategies,” *Harm Reduction Journal* 14, no. 1 (2017): 11, <https://doi.org/10.1186/s12954-017-0136-3>.

⁵¹ Jeffrey L. Derevensky and Rina Gupta, “Internet Gambling Amongst Adolescents: A Growing Concern,” *International Journal of Mental Health and Addiction* 5, no. 2 (2007): 98, <https://doi.org/10.1007/s11469-007-9057-9>; Sally M. Gainsbury et al., “An Exploratory Study of Interrelationships Between Social Casino Gaming, Gambling, and Problem Gambling,” *International Journal of Mental Health and Addiction* 13, no. 1 (2015): 136–53, <https://doi.org/10.1007/s11469-014-9526-x>.

⁵² Hing et al., “Risk Factors for Gambling Problems.”

⁵³ Hanne Gro Wenzel, Anita Øren, and Inger Johanne Bakken, “Gambling Problems in the Family – A Stratified Probability Sample Study of Prevalence and Reported Consequences,” *BMC Public Health* 8, no. 1 (2008): 412, <https://doi.org/10.1186/1471-2458-8-412>.

⁵⁴ Vachon et al., “Adolescent Gambling,” 400.

⁵⁵ Gill Valentine and Kahryn Hughes, “Ripples in a Pond: The Disclosure to, and Management of, Problem Internet Gambling with/in the Family,” *Community, Work & Family* 13, no. 3 (2010): 288, <https://doi.org/10.1080/13668803.2010.488107>; McCarthy et al., “Women and Gambling-Related Harm: A Narrative Literature Review and Implications for Research, Policy, And Practice.”

⁵⁶ Iqbal Kamalludin, “Women and Children as Victims of Financial-Based Violence in Online Gambling Circles: A Criminological Approach to Criminal Law and Rehabilitation Policy in Indonesia,” *Sawwa: Jurnal Studi Gender* 19, no. 1 (2024): 25, <https://doi.org/10.21580/sa.v19i1.22628>.

⁵⁷ Lynn Blinn-Pike, Sheri Lokken Worthy, and Jeffrey N. Jonkman, “Disordered Gambling among College Students: A Meta-Analytic Synthesis,” *Journal of Gambling Studies* 23, no. 2 (2007): 175–83, <https://doi.org/10.1007/s10899-006-9036-2>; Floros et al., “Adolescent Online Gambling: The Impact of Parental Practices and Correlates with Online Activities,” 144.

children not only affects individuals but also produces broad and long-term consequences for overall community welfare.

Various Criminal Methods in Criminological Review: Labor Exploitation in the Online Gambling Industry

The online gambling industry in Southeast Asia has long been recognized as fertile ground for various forms of labor exploitation, including human trafficking. In many cases, migrant workers from countries such as Indonesia are lured by promises of high-paying jobs, only to find themselves trapped in dire working conditions without rights and under threats of violence. These workers are often forced to labor in conditions akin to modern slavery, with no freedom to leave and under constant intimidation, extortion, and harassment.

Online gambling in the region has expanded significantly, particularly in countries such as Cambodia, Myanmar, and Malaysia, which serve as major hubs for illegal operations. In many cases, the criminal syndicates that operate these gambling businesses are not only engaged in illegal gambling but also in human trafficking and migrant labor exploitation. The workers—many of them foreign nationals, including Indonesians—are often subjected to inhumane conditions such as long working hours without adequate pay, no access to healthcare, and tight surveillance under the threat of physical violence.⁵⁸

The Southeast Asian online gambling industry has evolved not only into a widespread entertainment medium but also into a fertile ground for criminal syndicates to execute a variety of operations involving money laundering, labor exploitation, and human trafficking. From a criminological perspective, the various methods employed by criminal syndicates in this industry can be analyzed using several criminological theories to understand the complex dynamics underlying these illegal operations. One common method is labor fraud, where syndicates exploit the economic vulnerability of migrant workers from countries like Indonesia.⁵⁹ They are recruited through fake job advertisements promising high salaries abroad but are eventually forced to work under conditions resembling modern slavery upon arrival in Cambodia or Myanmar. Conflict theory in criminology, rooted in Marxian ideas, highlights how such exploitation arises from social and economic inequalities that benefit the powerful—namely, the criminal syndicates exploiting regulatory loopholes in countries with weak law enforcement.

Another frequent method is digital manipulation and the use of advanced technology to launder money through online gambling platforms. Rational choice theory provides a framework to understand how criminal syndicates carefully calculate the risks and benefits of their operations. Online gambling is favored due to its cross-border nature and the anonymity of financial transactions involving cryptocurrency, which allows perpetrators to conceal the origins of funds obtained from other crimes such as drug trafficking and arms sales.⁶⁰ Offenders exploit gaps in international regulation and jurisdictional differences to transfer money freely without detection. Profits from online gambling operations are then integrated into the formal

⁵⁸ Abby L. Goldstein et al., “Mood, Motives, and Money: An Examination of Factors That Differentiate Online and Non-Online Young Adult Gamblers,” *Journal of Behavioral Addictions* 5, no. 1 (2016): 68–76, <https://doi.org/10.1556/2006.5.2016.003>.

⁵⁹ Nelson Moura, “Southeast Asia Faces Escalating Threat from Illegal Online Gambling and Cyber Fraud,” *Asia Gaming Brief*, October 8, 2024, <https://agbrief.com/intel/deep-dive/08/10/2024/southeast-asia-faces-escalating-threat-from-illegal-online-gambling-and-cyber-fraud-un/>; United Nations, “Hundreds of Thousands Trafficked to Work as Online Scammers in SE Asia, Says UN Report,” *United Nations*, 2023, <https://www.ohchr.org/en/press-releases/2023/08/hundreds-thousands-trafficked-work-online-scammers-se-asia-says-un-report>.

⁶⁰ Tower and Clapp, “Myanmar’s Casino Cities: The Role of China and Transnational Criminal Networks,” *United States Institute of Peace*,” 37.

financial system through a complex series of transactions that are difficult for law enforcement to trace.

Strain theory, developed by Robert K. Merton, is also relevant in analyzing how social and economic pressures can drive vulnerable individuals to become involved in illegal activities.⁶¹ Many migrant workers exploited in the online gambling industry are initially motivated by the urgent need to secure better livelihoods, but the lack of access to legitimate employment opportunities pushes them to accept seemingly lucrative but high-risk job offers. Once trapped, they are forced to work under threats of physical or psychological violence and, in many cases, are denied the freedom to leave or even contact their families.⁶²

Another method worth noting is the misuse of digital technology by criminal syndicates to recruit workers and target victims via social media and messaging apps. In this context, contemporary criminological theories such as routine activity theory help explain why certain individuals are more often targeted. This theory posits that crime occurs when a motivated offender, a suitable target, and the absence of capable guardians converge. In the online gambling industry, victims are typically isolated from social support networks and placed in tightly controlled environments by syndicates, allowing perpetrators to exploit them without interference.

Feminist criminology is also relevant in analyzing the exploitation of female labor in this industry, where women often experience sexual violence, harassment, and worse treatment than male workers.⁶³ This perspective emphasizes that labor exploitation in the online gambling industry involves not only economic but also gendered dimensions that intensify female victims' vulnerability. Women are frequently forced to work in harsher, riskier conditions without access to adequate protection or assistance. This reveals that labor exploitation in the online gambling industry is intersectional—economic, social, and gender factors interact to worsen victims' conditions.⁶⁴

The various methods employed by criminal syndicates in the online gambling industry reveal systemic exploitation patterns encompassing economic, social, and technological dimensions. The combination of these criminological theories offers a comprehensive framework for understanding how these syndicates exploit structural inequality and gaps in international regulation to operate with impunity. This study emphasizes the need for stronger international cooperation, enhanced law enforcement capacity, and better protections for

⁶¹ Robert K. Merton and Jacqueline Schneider, "Social Structure and Anomie," in *Gangs*, 1st ed. (London: Routledge, 2017), 3–13, <https://doi.org/10.4324/9781351157803-1>; Francis T. Cullen and Pamela Wilcox, "Merton, Robert K.: Social Structure and Anomie," in *Encyclopedia of Criminological Theory*, ed. Francis T. Cullen and Pamela Wilcox (Thousand Oaks, California: SAGE Publications, Inc., 2010), 12, <https://doi.org/10.4135/9781412959193.n171>; Robert Agnew and Timothy Brezina, "General Strain Theory," in *Handbooks of Sociology and Social Research*, ed. Marvin D. Krohn et al. (Cham: Springer International Publishing, 2019), 146, https://doi.org/10.1007/978-3-030-20779-3_8.

⁶² UNODC, "Casinos, Cyber Fraud, and Trafficking in Persons for Forced Criminality in Southeast Asia Policy Report," UNODC, last modified 2023, 43, www.unodc.org/roseap.

⁶³ Alexandra Smith, "Sexual Violence is an Intersectional, Feminist Issue," *Women Advance*, April 21, 2021, <https://www.womenadvancenc.org/2021/04/21/sexual-violence-is-an-intersectional-feminist-issue/>; Sabrina Alimahomed-Wilson, "Invisible Violence: Gender, Islamophobia, and the Hidden Assault on U.S. Muslim Women," *Women, Gender, and Families of Color* 5, no. 1 (2017): 87, <https://doi.org/10.5406/womgenfamcol.5.1.0073>; M. Ali Zaidan, "Perempuan dalam Perspektif Hukum Pidana," *Jurnal Yuridis* 1, no. 2 (2014): 217–31, <https://doi.org/10.35586/v1i2.152>; Marie-Alice D'Aoust, "Sexual and Gender-Based Violence in International Criminal Law: A Feminist Assessment of the Bemba Case," *International Criminal Law Review* 17, no. 1 (2017): 208–21, <https://doi.org/10.1163/15718123-01701006>.

⁶⁴ Robert Jensen, "Getting Radical: Feminism, Patriarchy, and the Sexual-Exploitation Industries," *Dignity: A Journal of Analysis of Exploitation and Violence* 6, no. 2 (2021): 6, <https://doi.org/10.23860/dignity.2021.06.02.06>.

vulnerable migrant workers to prevent continued exploitation in this increasingly organized crime network.

In Cambodia, the online gambling industry has grown rapidly in cities such as Sihanoukville, where many gambling companies operate illegally. Numerous Indonesian citizens have reportedly become victims of human trafficking in this area, where they are forced to work as online gambling operators under highly exploitative conditions. The victims often experience confinement, physical violence, and sexual abuse, and are compelled to work long hours without pay or for extremely low wages.⁶⁵

In Myanmar, similar conditions are also found, particularly in border regions like Myawaddy.⁶⁶ Some online gambling companies operated by criminal syndicates employ illegal migrant workers from Indonesia to run their operations. These workers are often held in heavily guarded compounds, where they are forced to work relentlessly under threats of violence.

Malaysia has also become a hub for labor exploitation within the online gambling industry, with many reports emerging of Indonesian nationals being deceived into working in this sector.⁶⁷ Under the threat of deportation or physical punishment, they are forced to work in call centers or other parts of online gambling operations, where they are exploited both economically and physically. Labor exploitation in the online gambling industry violates various international and national legal frameworks designed to protect human rights and combat human trafficking. Internationally, the United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children (the Palermo Protocol), is a key instrument regulating human trafficking. This protocol sets standards for prevention, protection, and law enforcement against human trafficking, including labor exploitation. At the national level, countries like Indonesia, Cambodia, and Malaysia have laws prohibiting human trafficking and labor exploitation, although implementation is often hindered by corruption and a lack of effective law enforcement.

In Indonesia, although Law No. 21 of 2007 on the Eradication of the Crime of Human Trafficking was established to combat human trafficking and labor exploitation, its implementation is frequently stalled by complex bureaucracy and weak coordination among institutions such as BP2MI, the National Police (Polri), and the Ministry of Foreign Affairs—especially in cases of digital exploitation by transnational syndicates exploiting the online gambling industry.⁶⁸ Cambodia and Myanmar,⁶⁹ although possessing similar laws, often struggle to enforce them, particularly in the context of online gambling operations run by powerful criminal networks.⁷⁰ In Malaysia, despite the government's introduction of measures to curb human trafficking, such as the Anti-Trafficking in Persons and Anti-Smuggling of

⁶⁵ Jing Jing Luo, "The Grey Zone of Chinese Capital: Online Gambling in Cambodia's Sihanoukville," *Contemporary Southeast Asia* 45, no. 3 (2023): 414–41.

⁶⁶ Tower and Clapp, "Myanmar's Casino Cities: The Role of China and Transnational Criminal Networks, United States Institute of Peace," 111.

⁶⁷ Dhillon et al., "Online Gambling in Malaysia," 210.

⁶⁸ Gema Ramadhan Bastari, "How Patriarchal Culture Localizes Human Trafficking Eradication Norm: Case Study on the Implementation of Human Trafficking Eradication Law in Indonesia," *Politik Indonesia: Indonesian Political Science Review* 8, no. 1 (2023): 91–106, <https://doi.org/10.15294/ipsr.v8i1.38869>.

⁶⁹ Noah McDaniel, "A Case Study of Cambodia as an Emerging Center of Modern Human Trafficking and Organized Crime," George Mason University, last modified 2022, 332. <https://tracc.gmu.edu/wp-content/uploads/2023/02/McDaniel-PUBP-764-Final-Paper-for-Publication.pdf>.

⁷⁰ USIP Senior Study Group, "Transnational Crime in Southeast Asia: A Growing Threat to Global Peace and Security," *United States Institute of Peace*, May 13, 2024, 87, <https://www.usip.org/publications/2024/05/transnational-crime-southeast-asia-growing-threat-global-peace-and-security>.

Migrants Act 2007,⁷¹ weak implementation and corruption remain major barriers to eliminating labor exploitation in the online gambling sector.

Labor exploitation in the online gambling industry can be analyzed through several criminological theories that explain how and why this phenomenon occurs, as well as who the perpetrators and victims are. Conflict theory in criminology, rooted in Marxian thought, argues that labor exploitation is the result of structural inequality in capitalist societies. In the context of the online gambling industry, migrant workers recruited to work in countries like Cambodia and Myanmar often come from economically disadvantaged backgrounds, making them vulnerable to deception and exploitation. The powerful actors—in this case, criminal syndicates and online gambling companies—use their power to impose unfair working conditions, pay meager wages or no wages at all, while profiting enormously from forced labor.

In addition to conflict theory, the strain theory developed by Robert K. Merton is also relevant in understanding why individuals from vulnerable groups become trapped in labor exploitation within the online gambling industry. Strain theory posits that the discrepancy between widely accepted societal goals (such as economic success) and the available means to achieve them can push individuals toward deviant alternatives. In this case, migrant workers seeking economic opportunities abroad often face realities that differ starkly from their expectations. Lacking access to legal and decent employment, they are forced to accept jobs in the online gambling industry despite being aware of the risks. This situation is exacerbated by legal and social conditions in their home countries that fail to protect them from exploitation by criminal syndicates.⁷²

Contemporary criminological theories such as rational choice theory also provide insight into how labor exploitation in the online gambling industry operates. According to this theory, criminal behavior is based on rational calculations of risks and rewards. In cases of labor exploitation, criminal syndicates running online gambling platforms exploit workers because they assess the risk of being caught or punished as lower than the financial gains they receive. The low level of law enforcement and collusion with authorities in some countries allow these criminals to operate with impunity, while their victims have no access to justice or assistance.⁷³

Social control theory also offers an important perspective on why labor exploitation in the online gambling industry persists. This theory argues that deviant behavior, including crime, occurs when an individual's social bonds to society are weakened.⁷⁴ Migrant workers in the online gambling industry are often isolated from their families and communities, weakening the social ties that might prevent them from entering exploitative labor conditions. Moreover, they frequently work under threats of physical or psychological violence, further diminishing their ability to escape or seek help.

Feminist criminology emphasizes that labor exploitation in the online gambling industry cannot be separated from gender dynamics. Many female workers are recruited and exploited in this industry, experiencing sexual violence, harassment, and inhumane working conditions. This perspective highlights that labor exploitation in this context involves not only economic

⁷¹ Sahanah Kathirvelu and Mohamad Rizal Abd Rahman, "Analysis on the Online Gambling Laws in Malaysia," *UUM Journal of Legal Studies* 15, no. 1 (2024): 341, <https://doi.org/10.32890/uumjls2024.15.1.14>.

⁷² Mythily Subramaniam et al., "Gambling and Family: A Two-Way Relationship," *Journal of Behavioral Addictions* 6, no. 4 (2017): 689–98, <https://doi.org/10.1556/2006.6.2017.082>.

⁷³ Goldstein et al., "Mood, Motives, and Money," 72.

⁷⁴ Quang Anh Phan, "The Introduction of Internet to Vietnam as the Technological Foundation for Online Gaming: An Analysis," *Asia-Pacific Social Science Review* 19, no. 3 (2019): 34, <https://doi.org/10.59588/2350-8329.1236>.

exploitation but also gender exploitation, with women often suffering double victimization from both social and gender injustices.⁷⁵

Thus, labor exploitation in the online gambling industry should be understood as a complex and multidimensional phenomenon involving economic, social, and gender injustice. The combination of these criminological theories provides a framework to analyze how the system operates, who benefits, and who suffers. This exploitation is not merely an individual issue but reflects structural failures in the international legal and economic systems that enable such harmful crimes to occur.

Money Laundering and Online Gambling as Transnational Crimes and Their Implications on Legal Principles

Money laundering and online gambling have become among the most concerning forms of transnational crime in the era of digital globalization.⁷⁶ Money laundering is the process by which funds obtained from illegal activities—such as drug trafficking, human trafficking, or online gambling—are converted into seemingly legitimate assets. Online gambling, with its cross-border nature and internet-based operations, provides fertile ground for money laundering activities, allowing criminal syndicates to conceal the origin of their funds and integrate them into the global economy. As a transnational crime, these activities involve violations of law across multiple jurisdictions, posing major challenges for international law enforcement and raising critical questions about the application of legal principles.⁷⁷

Online gambling offers various mechanisms for money laundering, including the use of fake accounts, unusual betting patterns, and cross-border fund transfers that are difficult to trace. For instance, illegal funds can be laundered through large bets placed on online gambling platforms, where the winnings are then claimed as legitimate income. This is exacerbated by weak regulations in certain countries that lack stringent policies to monitor and regulate financial transactions within the online gambling industry. The presence of electronic payment systems and cryptocurrencies further complicates efforts to track the flow of funds, allowing criminal syndicates to move money through various jurisdictions undetected.⁷⁸

As transnational crimes, money laundering and online gambling not only challenge national law enforcement capacities but also test the effectiveness of international cooperation. The United Nations Convention against Transnational Organized Crime, also known as the Palermo Convention, underscores the importance of inter-state cooperation in combating transnational crimes. However, in practice, differences in laws and regulations across countries often hinder effective coordination efforts. For example, countries with lax regulations or those acting as safe havens for online gambling operations often obstruct efforts to combat money laundering effectively.⁷⁹

The implications of money laundering and online gambling as transnational crimes on legal principles are significant. First, they challenge the principle of territoriality, which holds that a country has jurisdiction over crimes committed within its borders. In the context of money laundering and online gambling, these territorial boundaries become blurred due to the cross-border nature of the crimes. This creates difficulties for states in determining jurisdiction and legal responsibility, especially when illegal funds pass through multiple countries with different

⁷⁵ Kaye Sung Chon and Cathy Hc Hsu, *Casino Industry in Asia Pacific: Development, Operation, and Impact* (New York: Routledge, 2012), 120, <https://doi.org/10.4324/9780203050378>.

⁷⁶ Dhillon et al., "Online Gambling in Malaysia," 210.

⁷⁷ Anne T. Gallagher, *The International Law of Human Trafficking*, 1st ed. (Cambridge: Cambridge University Press, 2010), 452, <https://doi.org/10.1017/cbo9780511761065>.

⁷⁸ Hapsari, Sidiq, and Sufyan Bature, "Law Enforcement Efforts by the Police in Eradicate Action Criminal Gambling on Line," 84.

⁷⁹ Elena Shih, "Life Interrupted: Trafficking into Forced Labor in the United States," *Contemporary Sociology: A Journal of Reviews* 44, no. 6 (2015): 780, <https://doi.org/10.1177/0094306115609925d>.

legal systems. Second, these crimes challenge the principle of legality, which requires that a person's actions must be deemed illegal under the law at the time they were committed. When online gambling and money laundering occur in countries with weak regulations or legal loopholes, it becomes difficult for law enforcement to administer justice effectively.

Legal loopholes often exploited in online gambling and money laundering crimes include the absence of explicit legal provisions regulating cross-border online gambling. Indonesia's Information and Electronic Transactions Law (ITE Law) and the Criminal Code (KUHP) remain insufficient to prosecute perpetrators who operate from abroad while targeting Indonesian citizens. Furthermore, Law No. 8 of 2010 on the Prevention and Eradication of Money Laundering Crimes relies heavily on reports from formal financial institutions, while perpetrators often use unregistered digital wallets or foreign platforms not supervised by Indonesia's Financial Services Authority (OJK) or the Financial Transaction Reports and Analysis Center (PPATK). A study by Bastari (2023)⁸⁰ also highlights weaknesses in the implementation of Law No. 21 of 2007 on the Eradication of the Crime of Human Trafficking, noting that authorities struggle to identify digital forced labor exploitation as part of human trafficking. This enables perpetrators to operate with impunity due to the legal difficulty of proving such cases. In addition, the lack of extradition treaties and limited access to cross-border data pose further obstacles when the victims are Indonesian nationals but the crimes occur in jurisdictions such as Cambodia or Myanmar.⁸¹

Third, these crimes also affect the principle of proportionality, which demands that punishments be proportionate to the offenses committed. In money laundering cases involving massive sums of money and affecting multiple countries, the main challenge is imposing sufficiently severe sanctions to deter future violations while remaining within a fair and proportional international legal framework. Moreover, money laundering and online gambling challenge the principle of protection, which states that the law must safeguard the rights and interests of the public. These crimes undermine the integrity of the global financial system and pose a real threat to national economic stability and security, thus requiring stronger and more coordinated legal responses at the global level.⁸²

In summary, money laundering and online gambling as transnational crimes demand a holistic and integrative legal approach, involving enhanced international cooperation, stronger regulations, and more effective and equitable law enforcement. Without such measures, these crimes will remain a serious threat to the integrity of the international legal system and the application of fundamental legal principles in a globalized context.

Victimological Review of Money Laundering, Labor Exploitation, and Human Trafficking within the Online Gambling Network: Who Should Act?

In Indonesia, although legal instruments such as Law No. 21 of 2007 on the Eradication of the Crime of Human Trafficking (UU TPPO) and Law No. 8 of 2010 on the Prevention and Eradication of Money Laundering (UU TPPU) are already in place, their implementation in the field continues to face various challenges, creating a serious gap between formal regulations and actual practice.

First, from the standpoint of law enforcement resources, many officers lack the technical expertise to identify cases of human trafficking and money laundering integrated with digital technology such as online gambling. Cases involving the exploitation of Indonesian citizens abroad are often treated merely as ordinary job fraud, rather than as part of transnational crime

⁸⁰ Bastari, "How Patriarchal Culture Localizes Human Trafficking Eradication Norm," 100.

⁸¹ McDaniel, "A Case Study of Cambodia as an Emerging Center of Modern Human Trafficking and Organized Crime," 122.

⁸² Greg Bankoff, "Redefining Criminality: Gambling and Financial Expediency in the Colonial Philippines, 1764–1898," *Journal of Southeast Asian Studies* 22, no. 2 (1991): 270, <https://doi.org/10.1017/s002246340000388x>.

networks. This occurs due to the lack of training on cross-border investigative techniques, digital financial tracking, and the use of cyber forensics.

Second, institutional fragmentation worsens the state's weak response. For example, the authorities of BP2MI (formerly BNP2TKI), the Ministry of Foreign Affairs, the National Police, and PPATK are not yet integrated into a unified system responsive to victims of exploitation working overseas. This weak coordination results in many reports or field findings failing to lead to legal action, as each institution operates in silos, often duplicating efforts or even blaming one another.

Third, corruption and conflicts of interest at local and regional levels are also major obstacles. In some cases, there are allegations of involvement by rogue officials in the illegal recruitment of migrant workers or in allowing Indonesian citizens to depart without complete documentation. This reduces the effectiveness of enforcing the UU TPPO and UU TPPU, as the main perpetrators may obtain informal protection.

Fourth, from the legal perspective itself, there remains legal ambiguity in defining and criminalizing the involvement of Indonesian citizens in transnational online gambling schemes, especially when offenses occur in another country's jurisdiction. Law enforcement is often hindered by the absence of adequate extradition agreements with countries like Cambodia or Myanmar, where this industry is flourishing.

As a result, although Indonesia normatively has adequate legal frameworks, effective enforcement cannot function optimally without reforms in law enforcement training systems, enhanced international cooperation, and the establishment of an integrated inter-agency task force specifically tasked with addressing digital exploitation and cross-border crimes. Without these measures, the gap between written law and field reality will continue to hinder protection for Indonesian migrant workers who fall victim to the online gambling industry.

Victims of exploitation in the online gambling industry often live in extremely dire and inhumane conditions. They are usually housed in overcrowded and unfit dormitories or facilities, where dozens to hundreds of workers are forced to live together in cramped, unsanitary spaces. The victims frequently endure severe restrictions on their freedom, prohibited from leaving the premises without permission from guards working for the criminal syndicates. These conditions are often exacerbated by tight surveillance, including the use of security cameras and armed guards, designed to prevent escape or appeals for help. In addition, victims face threats of physical violence if they disobey orders or attempt resistance, and in some cases, are brutally assaulted as a form of intimidation for other workers.⁸³

Moreover, victims' living conditions are unhygienic and unfit for habitation, marked by poor sanitation, limited access to clean water, and chronic food shortages. They are often forced to work for hours on end without proper rest, sleeping only a few hours in uncomfortable places such as on the floor or in rickety bunk beds.⁸⁴ One victim reported receiving little or no leisure time, with rest periods constantly disrupted by relentless work demands. Such treatment indicates total exploitation of their labor, where their lives and health are disregarded and treated merely as expendable resources without regard for humanity.⁸⁵

In some cases, victims are also forced to live under constant threats to their families back home. Criminal syndicates operating these facilities often use threats against victims' loved

⁸³ Jing Shi et al., "A Perspective on Age Restrictions and Other Harm Reduction Approaches Targeting Youth Online Gambling, Considering Convergences of Gambling and Videogaming," *Frontiers in Psychiatry* 11 (2021): 601712, <https://doi.org/10.3389/fpsy.2020.601712>.

⁸⁴ Runturambi and Arifin, "New Patterns and Trends of Migration"; Farhan Zarbiyani and Benny Djaja, "Perlindungan Hukum Terhadap WNI Pekerja Migran Non Prosedural yang Menjadi Pekerja Judi Online Di Luar Negeri," *Gorontalo Law Review* 6, no. 2 (2023): 379–87, <https://doi.org/10.32662/golrev.v6i2.2802>.

⁸⁵ Kim-Kwang Raymond Choo and Russell G. Smith, "Criminal Exploitation of Online Systems by Organised Crime Groups," *Asian Journal of Criminology* 3, no. 1 (2008): 37–59, <https://doi.org/10.1007/s11417-007-9035-y>.

ones as a means of control, ensuring that the victims do not attempt to escape or report the crimes they are subjected to. Furthermore, they are often coerced into signing unfair contracts or providing personal information later used to blackmail them if they refuse to work. These conditions leave the victims feeling hopeless, believing they have no choice but to comply with all demands—even if it means risking their health, well-being, and even their lives.⁸⁶

This exploitation is not only physically damaging but also results in deep psychological trauma. Many victims experience mental health disorders such as depression, anxiety, and post-traumatic stress disorder (PTSD) due to the abuse and violence they endure. The long-term effects of this trauma often persist even after they are freed from exploitation, affecting their ability to return to normal life and function socially.⁸⁷ Much inhumane treatment represents the most severe form of exploitation, where victims lose their fundamental human rights and are treated solely as tools for profit by criminal syndicates that show no concern for their welfare.

Victimology, as the study of crime victims and their relationship with perpetrators and the criminal justice system, is essential for understanding the social impacts of money laundering, labor exploitation, and human trafficking within the online gambling network. In this context, victims are not only those who directly suffer physical violence or extortion but also those trapped in the complex networks of economic exploitation, social injustice, and legal powerlessness. Online gambling has evolved into an industry that not only causes financial loss but also entails severe violations of human rights through various forms of exploitation and transnational crime.⁸⁸

Within the scope of online gambling, money laundering is often inseparable from other crimes such as labor exploitation and human trafficking. Labor exploitation in this industry often begins with deceptive recruitment, where individuals are promised high-paying jobs abroad but are ultimately forced to work under severely adverse conditions—often without pay and under threat of violence. These victims not only lose their freedom but also become part of the global money laundering chain, with profits from their exploitation used to fund further illegal activities.

Victimology emphasizes the importance of understanding who the victims are and the extent to which the legal and social systems can provide protection and recovery for them. In online gambling cases, victims are often in highly vulnerable positions, including migrant workers, women, and children who are recruited or trafficked from countries with weak legal protections. Victims of these crimes face tremendous barriers in accessing justice, particularly due to lack of legal support, social stigma, and fear of retaliation from criminal syndicates.

However, a victimological review also prompts us to ask: who should take action in confronting these crimes? States have a responsibility to protect their citizens from transnational crimes through effective law enforcement and international cooperation. Yet often, governments fail to provide adequate protection due to corruption, lack of resources, or indifference. This raises fundamental questions about global responsibility and how the international community can work together to combat this exploitation. International organizations such as the UN and INTERPOL also play key roles in facilitating cross-border

⁸⁶ Mohammad Rubaiyat Rahman, “Gambling with Humanity at Sea: States’ Legislative and Policy Responses to Irregular Migration in the Indian Ocean,” *Journal of the Indian Ocean Region* 17, no. 3 (2021): 310, <https://doi.org/10.1080/19480881.2021.2001984>.

⁸⁷ Daria Ukhova et al., “Public Health Approaches to Gambling: A Global Review of Legislative Trends,” *The Lancet Public Health* 9, no. 1 (2024): e57–67, [https://doi.org/10.1016/S2468-2667\(23\)00221-9](https://doi.org/10.1016/S2468-2667(23)00221-9).

⁸⁸ Mingkwan Prasertsiwaporn and Thoedsak Chomtohsuwan, “Poverty, Gambling, and Law in the Digital Economy,” *Corporate Law & Governance Review* 5, no. 2 (2023): 112.

cooperation and establishing global standards for preventing and enforcing laws against human trafficking and money laundering.⁸⁹

Non-governmental organizations and civil society also play crucial roles in providing assistance to victims and raising awareness of the harms caused by these crimes. International NGOs are often at the forefront of efforts to rescue and rehabilitate victims and pressure governments to act more decisively in enforcing laws and protecting victims' rights. Thus, victimology reveals the importance of collective responsibility in addressing these crimes, emphasizing that victim protection and offender prosecution must be a global priority involving all stakeholders.

Strategies and Challenges in Addressing Money Laundering, Labor Exploitation, and Human Trafficking in the Online Gambling Network: Opportunities and Challenges

Addressing and combating the crimes of money laundering, labor exploitation, and human trafficking within the online gambling network requires an integrated and multidimensional approach. Various ideas have been proposed in international academic literature to tackle these challenges, ranging from strengthening regulatory frameworks to enhancing international cooperation. One primary approach is the reinforcement of national and international legal frameworks that are more effective and responsive to the evolving modus operandi of criminal actors. For instance, regulatory reforms that allow law enforcement authorities to proactively detect and prevent the flow of illicit funds through global banking systems and digital payment platforms have become a central focus in the fight against money laundering connected to online gambling.⁹⁰ Additionally, there are calls for tighter oversight of financial institutions and digital payment service providers to improve the detection of suspicious transactions and ensure they are reported promptly to relevant authorities.⁹¹

Beyond regulatory approaches, the importance of international cooperation is frequently highlighted. Given the transnational nature of these crimes, collaboration among countries and international organizations such as INTERPOL, the Financial Action Task Force (FATF), and the United Nations Office on Drugs and Crime (UNODC) is vital to coordinating law enforcement and prevention efforts across jurisdictions. Research has shown that collective efforts among nations in sharing information, extraditing perpetrators, and harmonizing regulations can significantly improve the effectiveness of addressing cross-border crimes related to online gambling.⁹² In this regard, the development of secure and efficient information exchange mechanisms between countries has also been proposed to ensure that intelligence data related to money laundering and human trafficking can be accessed globally by authorized parties.

In addition to legal and international cooperation strategies, capacity-building and training for law enforcement are crucial elements in combating these crimes. Law enforcement officers often face technical challenges in tracking illicit fund flows involving advanced technologies; thus, proper training in the use of financial analysis tools and digital forensics is highly necessary. Technological literacy and the ability to understand and identify suspicious

⁸⁹ Michael G. Peletz, "Neoliberalism and the Punitive Turn in Southeast Asia and beyond: Implications for Gender, Sexuality, and Graduated Pluralism," *Journal of the Royal Anthropological Institute* 26, no. 3 (2020): 614, <https://doi.org/10.1111/1467-9655.13317>.

⁹⁰ Hai Thanh Luong, "Transnational Crime and Its Trends in South-East Asia: A Detailed Narrative in Vietnam," *International Journal for Crime, Justice and Social Democracy* 9, no. 2 (2020): 88–101, <https://doi.org/10.3316/informit.171497886086925>.

⁹¹ David W. Miller, "The Oxford Handbook of the Economics of Religion," *Religious Studies Review* 44, no. 1 (2018): 45, <https://doi.org/10.1111/rsr.13408>.

⁹² Shi et al., "A Perspective on Age Restrictions and Other Harm Reduction Approaches Targeting Youth Online Gambling, Considering Convergences of Gambling and Videogaming."

transaction patterns on online gambling platforms are key to increasing the effectiveness of law enforcement.

ASEAN, as a regional organization representing ten Southeast Asian nations, holds significant potential to address labor exploitation and human trafficking linked to the online gambling industry within its territory. As a bloc dedicated to promoting peace, stability, and economic prosperity in Southeast Asia, ASEAN possesses various mechanisms and instruments to address these cross-border crimes. One of ASEAN's key strengths lies in its ability to facilitate cooperation among member states through jointly agreed conventions and frameworks. For example, ASEAN adopted the ASEAN Convention Against Trafficking in Persons, Especially Women and Children (ACTIP) in 2015, a key legal instrument aimed at strengthening efforts against human trafficking in the region. This convention establishes minimum standards for prevention, law enforcement, and victim protection, and emphasizes the importance of regional collaboration in addressing these transnational challenges.⁹³

In addition, ASEAN holds great potential through the ASEAN Political-Security Community (APSC) and the ASEAN Economic Community (AEC), which provide platforms for its member states to coordinate and take collective action against transnational crime. APSC, for instance, serves as a forum for ASEAN countries to discuss regional security issues, including organized crime, and to develop joint policies for addressing them. Through APSC, ASEAN has facilitated dialogues and cooperation in the area of law enforcement, which is crucial in confronting the threats posed by criminal syndicates involved in labor exploitation and human trafficking. Furthermore, AEC functions to enhance regional economic integration, which in turn can help reduce vulnerability to economic exploitation by creating more legitimate employment opportunities and strengthening labor market regulation across the region.

Nevertheless, although ASEAN has a strong framework in place, one of the main challenges faced by the organization is the uneven implementation and varied commitment among its member states. The principle of non-intervention that underpins inter-state relations in ASEAN often becomes a barrier to the effective execution of regional policies, especially in terms of cross-border law enforcement. Despite this, ASEAN has the potential to overcome these challenges by increasing engagement with civil society and international organizations, and by developing more effective oversight mechanisms to ensure that all member states comply with their commitments. This approach could strengthen ASEAN's capacity to act as a collective force capable of comprehensively and coherently addressing labor exploitation and human trafficking.⁹⁴

ASEAN also has a vital role in strengthening judicial and law enforcement systems in its member countries through capacity-building and training programs for law enforcement personnel. ASEAN has launched several initiatives to enhance regional collaboration in law enforcement, including the ASEAN Ministerial Meeting on Transnational Crime (AMMTC), which facilitates coordination among member states in combating various forms of transnational crime, including human trafficking and money laundering associated with the online gambling industry. The success of these initiatives depends on adequate political commitment and technical capacity from each member state, as well as sustained support from international partners.⁹⁵

ASEAN's strength in tackling labor exploitation and human trafficking in the context of the online gambling industry lies in its ability to combine legal, economic, and social

⁹³ Rahman, "Gambling with Humanity at Sea."

⁹⁴ Jing Jing Luo and Kheang Un, "Cambodia: Hard Landing for China's Soft Power?," *Perspective* 111 (2020): 1-8.

⁹⁵ Iqbal Kamalludin et al., "Criminal Law Treats for Online Gambling Performers: Investment Fraud Modes," *Dialogia Iuridica* 14, no. 1 (2022): 32, <https://doi.org/10.28932/di.v14i1.5252>.

approaches within a cohesive framework for regional cooperation. While challenges remain in implementation and coordination, ASEAN holds considerable potential to be a driving force in the collective effort to eradicate these transnational crimes, ensure better protection for vulnerable migrant workers, and promote stability and security throughout the Southeast Asian region.

This study affirms the importance of strengthening early detection mechanisms and rapid response systems in protecting victims through Indonesia's overseas representations (embassies and consulates), especially in addressing Indonesian citizens who are victims of job scams. Urgent policy implications include the establishment of integrated service units abroad specifically dedicated to handling digital exploitation cases, as well as social and psychological reintegration programs for victims repatriated to Indonesia. Victim care must also be a top priority in efforts to address these crimes. Various recovery strategies, including psychological rehabilitation, legal assistance, and social reintegration, have been proposed in the literature. A human rights-based approach to dealing with victims of labor exploitation and human trafficking is indispensable, considering the vulnerability and trauma experienced by victims.⁹⁶ The provision of continuous support services and access to justice are key elements that must be prioritized in public policy to ensure that victims are not only rescued but also empowered to rebuild their lives.

In the long-term prevention perspective, both the government and civil society must promote digital literacy and awareness of online crime risks among prospective migrant workers, including through BP2MI training curricula and public campaigns. The implication of this approach is increased social and legal resilience against illegal recruitment practices that entrap Indonesians in transnational crimes. Educational campaigns targeting vulnerable groups, including migrant workers and communities at risk of exploitation, can help prevent them from falling into these traps. Education should also emphasize the importance of reporting suspicious activities and supporting victims in accessing the assistance they need.⁹⁷ Therefore, the fight against money laundering, labor exploitation, and human trafficking within the online gambling network must be a collective effort involving various stakeholders—from government to civil society—within a holistic and sustainable framework.

Conclusion

The online gambling industry has become a vehicle for criminal syndicates to engage in various forms of exploitation, particularly targeting migrant workers from Indonesia who are often lured by promises of lucrative employment but are subsequently forced to work under inhumane conditions. The impact of online gambling on women and children not only affects individuals but also brings about far-reaching and long-term consequences for the overall well-being of society. Labor exploitation within the online gambling industry is not merely an individual problem; it reflects structural failures in the global economic and legal systems that enable the persistence of such highly detrimental crimes. Law enforcement is challenged not only by the transnational nature of these crimes but also by the complexity of inter-state coordination. A holistic and integrative approach is crucial in addressing money laundering and online gambling as transnational crimes—this includes strengthening regulations, enhancing international cooperation, and developing the capacity of law enforcement to tackle crimes involving advanced technologies. A human rights-based approach is also essential in addressing victims of labor exploitation and human trafficking. Public education and raising awareness about the risks and consequences of online gambling are integral components of a sustainable

⁹⁶ Michael Tonry, *Crime and Criminal Justice*, Oxford Handbooks Online (Oxford: Oxford University Press, 2011), 232, <https://doi.org/10.1093/oxfordhb/9780195395082.013.0001>.

⁹⁷ Louise Shelley, *Human Trafficking: A Global Perspective* (Cambridge: Cambridge University Press, 2010).

counter strategy. To overcome the challenges posed by money laundering, labor exploitation, and human trafficking within the online gambling ecosystem, a unified and collaborative approach involving multiple stakeholders—both at the national and international levels—is imperative.

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