

THREAT INTELLIGENCE INVESTIGATION · INDONESIA

The Architecture of Indonesia's Online Gambling Economy

Money, people, infrastructure and enforcement across Southeast Asia

DIVISION

CloudSEK STRIKE

REGION

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Prologue: The Tower on Hayam Wuruk

On Saturday, 9 May 2026, Indonesian police announced the arrest of 321 foreign nationals inside an office tower on Jalan Hayam Wuruk, at the edge of Jakarta's old Chinatown. Two hundred and twenty-eight were Vietnamese and fifty-seven were Chinese. The others came from Myanmar, Laos, Thailand, Cambodia and Malaysia.

Investigators described an operation run like a mid-sized company, with divisions for customer service, telemarketing and finance. It had been active for about two months and was linked to more than 70 online gambling websites. According to police, those websites were marketed to players outside Indonesia.

Earlier the same week, immigration officers in Batam detained 210 more foreign nationals from Vietnam, China and Myanmar in a suspected online investment fraud operation. Asked what lay behind the arrivals, Untung Widyatmoko, secretary of Indonesia's Interpol bureau, pointed to the rest of the region. After enforcement measures in Cambodia, he told reporters, "we started to see a shift toward Indonesia."

That shift is the starting point of this report. Between July 2024 and October 2025, the Philippines outlawed its offshore gaming industry, Cambodia launched nationwide raids on scam compounds, Myanmar's military moved against KK Park, and Timor-Leste revoked all of its online gambling licences. Each action closed one door. The people, capital and equipment moved to the next.

Indonesia offered them a market of unusual depth. In 2025, PPATK, the country's financial intelligence unit, recorded Rp286.84 trillion in online gambling turnover across 422.1 million transactions, and 12.3 million people made deposits. Its cumulative total since 2017 stands at Rp1,163 trillion. Most players earn less than Rp5 million a month. Government figures put the number of players under the age of ten at around 80,000.

The chapters that follow trace the system layer by layer: the money, the regional movement of operators, the people who play, the infrastructure that keeps the websites online, and the institutional gaps that allow it to persist. Chapter 6 then connects those layers and sets out nine patterns that become visible only when the evidence is read together.

Executive Summary: Bent, Not Broken

Rp1,163Tcumulative turnover recorded
by PPATK since 2017**12.3M**people made gambling
deposits in 2025**78.5%**of 2025 deposit transactions
carried by QRIS**321**foreign nationals detained in
one Jakarta tower

Indonesia's illegal online gambling economy, known locally as judol, is adapting to enforcement rather than retreating from it. Recorded turnover fell in 2025 for the first time since PPATK began tracking it in 2017, but the market that remains is more fragmented, more mobile and more deeply embedded in everyday payment systems. At the same time, enforcement elsewhere in Southeast Asia has pushed operators into Indonesia, which now serves as a base for operations aimed at other countries as well as a destination market.

Seven findings that change the picture

- 1 The market is compressing, not collapsing.** Turnover fell 20.3% to Rp286.84 trillion in 2025 and a further 12.9% year on year in the first half of 2026. Over that half year, however, deposits rose 26% and the number of deposits rose almost 140%. PPATK attributes part of the rise to better detection; either way, money is moving in smaller, more frequent amounts. QRIS carried 78.5% of deposit transactions in 2025, at an average of about Rp63,400, roughly a third of the average bank or e-wallet deposit.
- 2 Regional enforcement has displaced operators into Indonesia.** Indonesia's Interpol bureau has linked the arrival of foreign operators to enforcement in Cambodia. In May 2026, police detained 321 foreign nationals at a single gambling hub in Jakarta.
- 3 Indonesia has become a host as well as a market.** The Jakarta hub ran more than 70 websites marketed to players outside the country. Indonesia's risk now includes exporting gambling operations, not only consuming them.
- 4 Financial signals of human trafficking rose as operators arrived.** PPATK recorded Rp10.20 billion in transactions indicated as linked to human trafficking in 2025, and Rp406.80 billion in the first half of 2026 alone. The rise coincides with the arrival of foreign-run operations; part of it may also reflect improved detection.
- 5 The player base is financially fragile.** Seventy-one percent of players identified in the first quarter of 2025 earned under Rp5 million a month. In 2024, 3.8 million of 8.8 million identified players also held loans outside banks, cooperatives and credit cards.
- 6 Financial action has outperformed physical raids.** After Myanmar's raid on KK Park, independent satellite analysis found most of its buildings still standing, and 14 of 21 known compounds in the same township had expanded during 2025. The October 2025 US and UK action against Cambodia's Prince Group designated 146 targets and sought forfeiture of about 127,271 bitcoin. In Indonesia, gambling funds forfeited by final court rulings total Rp588.62 billion, equal to about 1.6% of the deposits recorded in 2025 alone.
- 7 The blocking system proved vulnerable from the inside.** In 2024, people working within the ministry process for blocking gambling sites kept around 1,000 sites online in exchange for payment. Four defendants were convicted in November 2025.

1. Follow the Money: Rp1,163 Trillion and Counting

A market that grew 179-fold in seven years

PPATK's records show online gambling turnover rising every year, from Rp2.01 trillion in 2017 to Rp359.81 trillion in 2024. In 2025 it fell to Rp286.84 trillion, roughly US\$17 to 18 billion at 2025 exchange rates, and total deposits fell from Rp51.3 trillion to Rp36.01 trillion. PPATK described the decline as the first since 2017. Indonesia's National Economic Council (DEN) had estimated that online gambling reduced economic growth by as much as 0.3% in 2024. PPATK's cumulative total for 2017 to 2025 is Rp1,163 trillion.

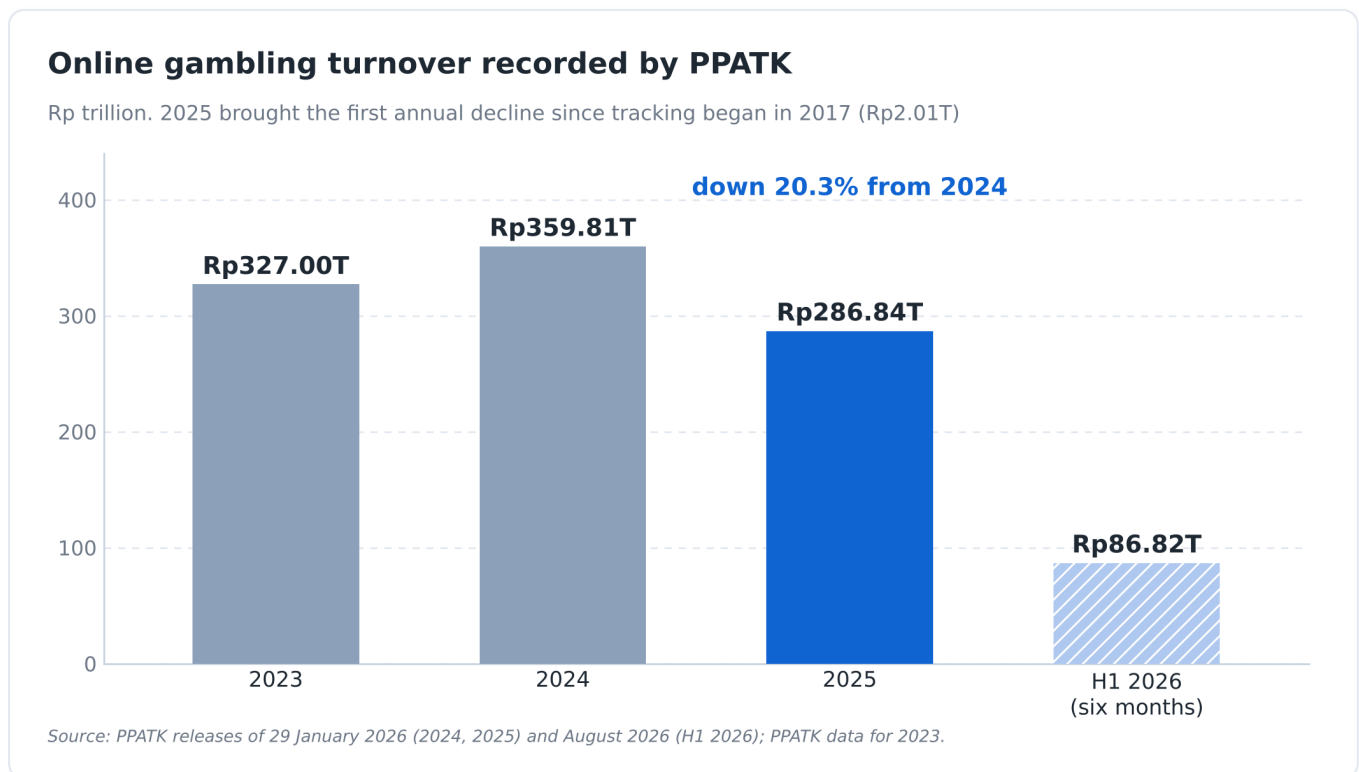


Figure 1. Online gambling turnover recorded by PPATK, 2023 to the first half of 2026.

Smaller, faster, harder to see

The fall in value did not mean the activity had stopped. PPATK's analysis, published in July 2026, found that transactions had become more frequent, more widely dispersed and smaller. The first half of 2026 recorded Rp86.82 trillion in turnover, 12.9% less than a year earlier, yet deposits rose 26% to Rp22.05 trillion and the number of deposits rose almost 140% to 226.76 million. PPATK noted that part of the increase reflects improved detection of small, repeated transactions.

The clearest evidence is in how players deposit money. In 2025, QRIS, Bank Indonesia's national QR payment standard, handled 305.35 million gambling deposits worth Rp19.35 trillion, or 78.5% of all deposits by count. Bank transfers and e-wallets handled 83.79 million deposits worth Rp16.67 trillion. The average QRIS deposit was therefore about Rp63,400, against roughly Rp199,000 through banks and e-wallets. In the first half of 2026, QRIS carried 56.04% of deposit value and 87.66% of deposits by count. PPATK has stressed that this dominance does not mean QRIS itself is a problematic instrument.

QRIS carried most gambling deposits in 2025, in much smaller amounts

305.35M QRIS deposits worth Rp19.35T, against 83.79M bank and e-wallet deposits worth Rp16.67T

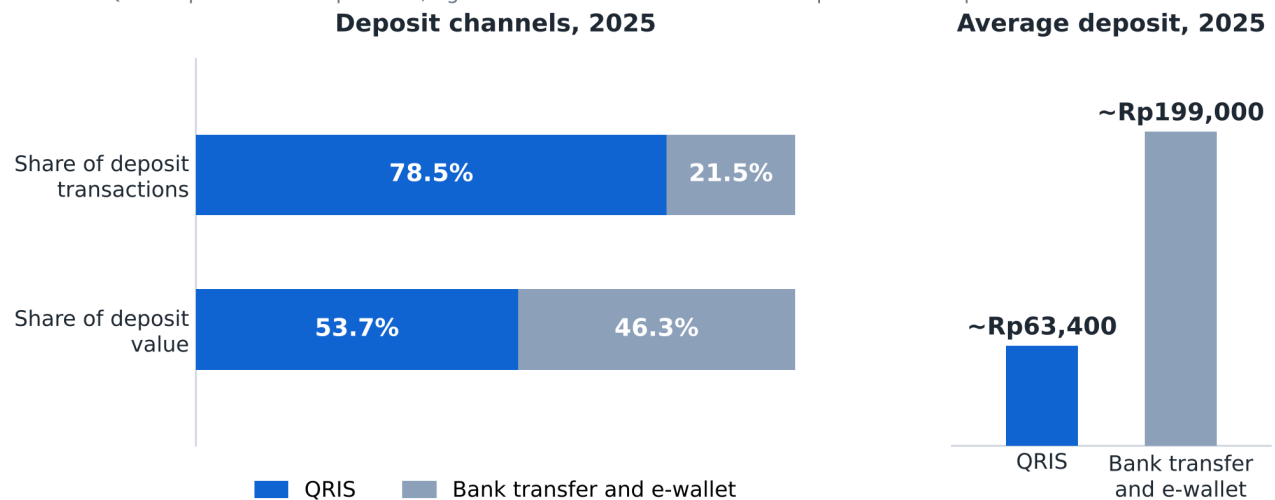


Figure 2. Deposit channels and average deposit size, 2025.

For transaction monitoring, this matters more than the headline decline. Systems calibrated to catch large or unusual transfers will see less of a market whose typical deposit is smaller than a restaurant bill. PPATK has identified proxy accounts and fictitious merchants among the methods now used to route gambling funds through QRIS.

The World Cup: six million deposits in a month

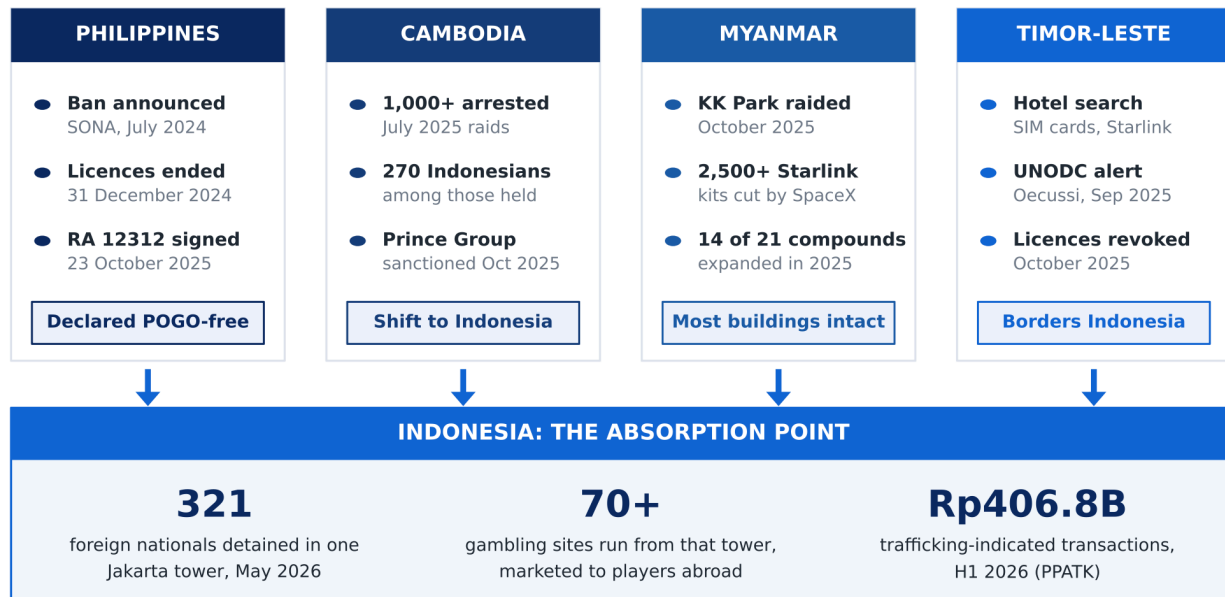
Major football tournaments reliably lift betting demand. From mid-June to July 2026, during the FIFA World Cup, PPATK identified Rp1.02 trillion in World Cup-linked gambling deposits across 6,001,352 transactions and temporarily suspended 2,815 accounts holding Rp325.43 billion. The surge shows demand that still responds quickly to events, which is the behaviour of a resilient market rather than a declining one.

2. The Waterbed Effect: Press Here, It Rises There

Enforcement against offshore gambling and scam compounds in Southeast Asia has a consistent side effect. When one jurisdiction closes, operators, workers, equipment and capital move to another, a dynamic often described as the waterbed effect. The stakes are large: UNODC has estimated that scam operations in the region cost victims up to US\$37 billion in 2023. Between 2024 and 2026, four jurisdictions around Indonesia acted almost at once.

The waterbed effect: regional enforcement, 2024 to 2026

Each closure pushed operators, capital and labour toward Indonesia



Sources: Philippine DOJ; AP; Al Jazeera; US Treasury; AFP; C4ADS; UNODC; Indonesian National Police; PPATK (August 2026).

Figure 3. Regional enforcement actions and their effect on Indonesia, 2024 to 2026.

Philippines: from tax base to crime scene

President Ferdinand Marcos Jr. announced a ban on Philippine Offshore Gaming Operators (POGOs) in his State of the Nation Address in July 2024. Executive Order No. 74 followed in November 2024, and licensed operations ended on 31 December 2024. On 23 October 2025 he signed Republic Act No. 12312, the Anti-POGO Act, which repealed the 2021 law that had taxed the industry and classified offshore gaming as unlawful activity under the Anti-Money Laundering Act. Alice Guo, the former town mayor at the centre of the POGO scandal, was arrested in Indonesia in September 2024 after fleeing the Philippines. On 6 April 2026, Justice Secretary Fredderick Vida said no licensed or illegal POGOs remained, adding that monitoring would continue.

Cambodia: raids, sanctions and airstrikes

Cambodian authorities arrested more than 1,000 people in nationwide raids in July 2025, including at least 270 Indonesians detained in Poipet on the Thai border. On 14 October 2025, the United States and the United Kingdom took what the US Treasury called the largest action ever against cybercriminal networks in Southeast Asia: 146 designations linked to the Prince Group, an indictment of its chairman Chen Zhi, and a civil forfeiture complaint covering about 127,271 bitcoin, then worth around US\$15 billion. When fighting resumed on the Thai-Cambodian border in December 2025, Thai airstrikes hit several casino and scam compounds, beginning with O'Smach on 8 December. Thailand said some sites doubled as military facilities, which Cambodia rejected. Amnesty International had earlier identified the O'Smach resort as

a scam compound. On 6 January 2026, Cambodia arrested Chen Zhi and deported him to China. From mid-January, Indonesia's embassy recorded a surge of Indonesian workers leaving scam syndicates, described below.

Myanmar: the raid that left the walls standing

Myanmar's military announced in October 2025 that it had raided KK Park, one of the most notorious compounds on the Thai border. State media said troops found nearly 2,200 workers at the site and seized 30 sets of Starlink equipment. Days later, SpaceX said it had disabled more than 2,500 Starlink kits near suspected scam centres in Myanmar. Independent satellite analysis told a more limited story: AFP found about a quarter of KK Park damaged or destroyed by early November, and Associated Press analysis found most buildings wholly or partially intact on 4 December. The research group C4ADS found that 14 of 21 known compounds in Myawaddy township had been built or expanded during 2025. The Thai military said about 1,500 KK Park workers crossed into Thailand through official channels, a fraction of a workforce estimated in the tens of thousands. The whereabouts of the rest are unknown.

Timor-Leste: the enclave that rang the alarm

Timor-Leste had positioned itself as a new hub for regulated online gambling. In the Oecussi enclave, several people were detained on suspicion of illegal gambling and computer fraud, and a hotel search on 25 August 2025 seized SIM cards and Starlink devices. On 11 September 2025, UNODC issued an Organised Crime Threat Alert on criminal infiltration of Timor-Leste through foreign investment, focused on Oecussi and its digital free-trade zone. The alert described links to the 14K Triad, including Wan Kuok-koi, a former Macau gang leader. In early October 2025 the Council of Ministers revoked all online gambling licences and halted new applications.

CloudSEK Researcher Insight: a crime hub on Indonesia's doorstep

Oecussi is enclosed on land entirely by West Timor, part of Indonesia's East Nusa Tenggara province. In 2025, a UN-documented organised crime presence operated there inside a jurisdiction that was, at the time, licensing online gambling. Regional coverage has treated Oecussi as a Timorese story. Its geography makes it an Indonesian border and financial monitoring question as well.

Indonesia: from customer to host

The May 2026 raid showed two things. First, the displacement described by Indonesia's Interpol bureau was operational, not theoretical. Second, the Jakarta hub was not serving Indonesian players: its websites were marketed abroad, and the Batam operation detained the same week was an investment fraud operation. Police said similar operations had recently been uncovered in Surabaya and Bali. Indonesia is now a place where regional crime groups run businesses, not only a place where they find customers.

A two-way street for labour

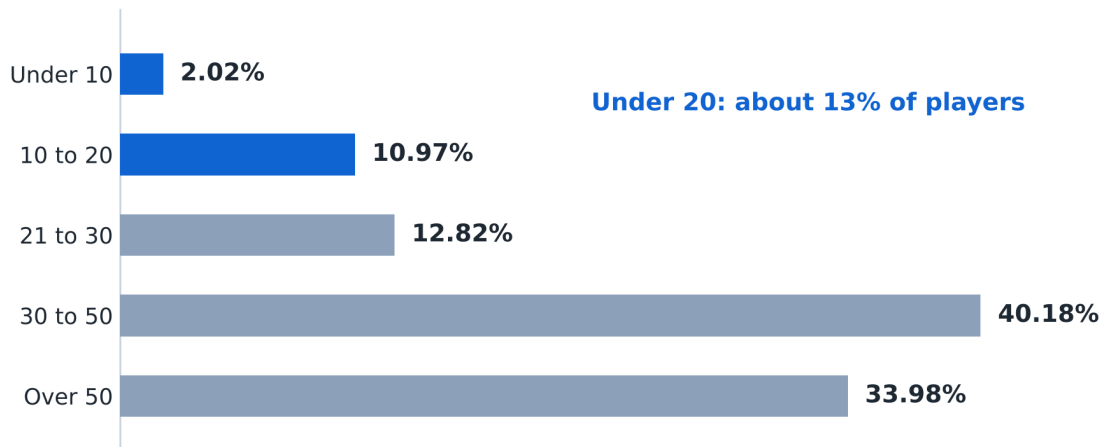
Indonesia also supplies labour to the regional industry. At least 270 Indonesians, including 45 women, were detained in Poipet during Cambodia's July 2025 raids, and on 31 August 2024 a raid on a resort in Cebu, in the Philippines, carried out at the Indonesian Embassy's request, found 70 Indonesians among 162 foreign nationals. In December 2024, Indonesia's Foreign Ministry said Cambodian immigration records showed 89,000 Indonesians holding residence permits there, while only 17,212 had registered with the embassy in 2023. Of the embassy's 2,321 legal cases in 2024, 77% involved online fraud, and the ministry noted a growing number of Indonesians taking such work voluntarily. In the two weeks to 29 January 2026, 2,752 Indonesians leaving scam syndicates asked the embassy in Phnom Penh for help to return home; the embassy said assessments of half of them found no indication of trafficking. By 5 May 2026 the total had reached 8,002, of whom 3,348 had been helped home. Police found that recruits typically travelled on tourist visas through transit points such as Batam and Singapore. The UN human rights office estimated in 2023 that at least 120,000 people in Myanmar and around 100,000 in Cambodia were being held in scam operations. For Indonesia, screening, repatriation and the prevention of recruitment matter as much as stopping operators from relocating.

3. Who Pays the Price

Online gambling in Indonesia is concentrated among people with the least financial room to absorb losses. PPATK data covering 2017 to 2023 shows that four in ten players were aged 30 to 50, one in three was over 50, and about 13% were under 20.

Age profile of online gambling players

Share of players in PPATK data, 2017 to 2023



Source: PPATK, presentation to DPR Commission III, 6 November 2024.

Figure 4. Age profile of online gambling players, PPATK data for 2017 to 2023.

Children: exposed before any age check

In November 2024, the Minister of Communication and Digital Affairs, Meutya Hafid, said around 200,000 players were under 19 and about 80,000 were under 10. Many, she said, used their parents' accounts and reached gambling content through games. Exposure therefore begins in the ordinary apps and platforms children already use, before any age check is encountered.

Betting the household budget

Of the 1,066,000 players PPATK identified in the first quarter of 2025, 71% earned less than Rp5 million a month, about US\$300. PPATK has also reported that players earning under Rp1 million a month spent most of their income on gambling, and that those earning between Rp1 million and Rp20 million spent more than 40%. Debt is part of the pattern: in 2024, 3.8 million of the 8.8 million players identified held loans outside banks, cooperatives and credit cards, up from 2.4 million of 3.7 million in 2023.

Financial fragility among players

Income, informal debt and the share of income spent on gambling

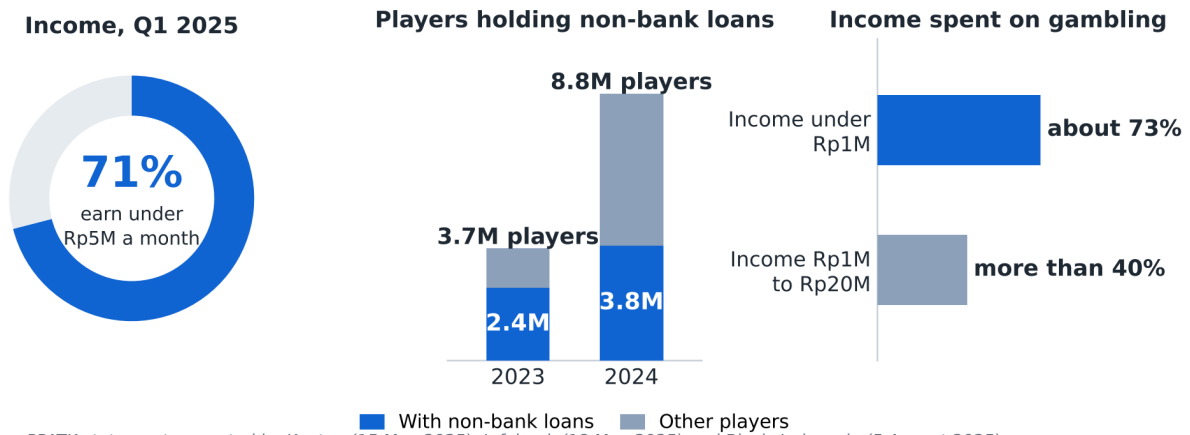


Figure 5. Income, informal debt and spending among online gambling players.

Welfare flags: leads, not verdicts

The Ministry of Social Affairs cross-checks recipients of social assistance against PPATK data. On 5 August 2026 it suspended aid to 1,494,652 households in the Sembako food assistance programme flagged for suspected gambling transactions, 794,475 of which also received PKH cash transfers. That compares with nearly 600,000 households flagged in 2025. On 19 August the ministry said more than one million of the flagged records concerned family members registered as children, and that about 44,000 households had completed a clarification process that lets families show an identity was used by someone else. A flagged household is a lead for verification, not a finding of gambling, and should be reported as such.

4. Inside the Operator Playbook

The technical side of the judol economy is organised like a consumer technology business: it acquires users, converts them, retains them and moves their money. Each stage relies on services that are legitimate in themselves and located outside Indonesian jurisdiction. The acquisition, lure and funnel techniques below were observed in CloudSEK XVigil captures during this investigation, including forum posts on the dark and surface web, domain and brand monitoring alerts, and social media and messaging channel activity; account names, vendor identities and prices are withheld. The retention and laundering techniques draw on PPATK findings.

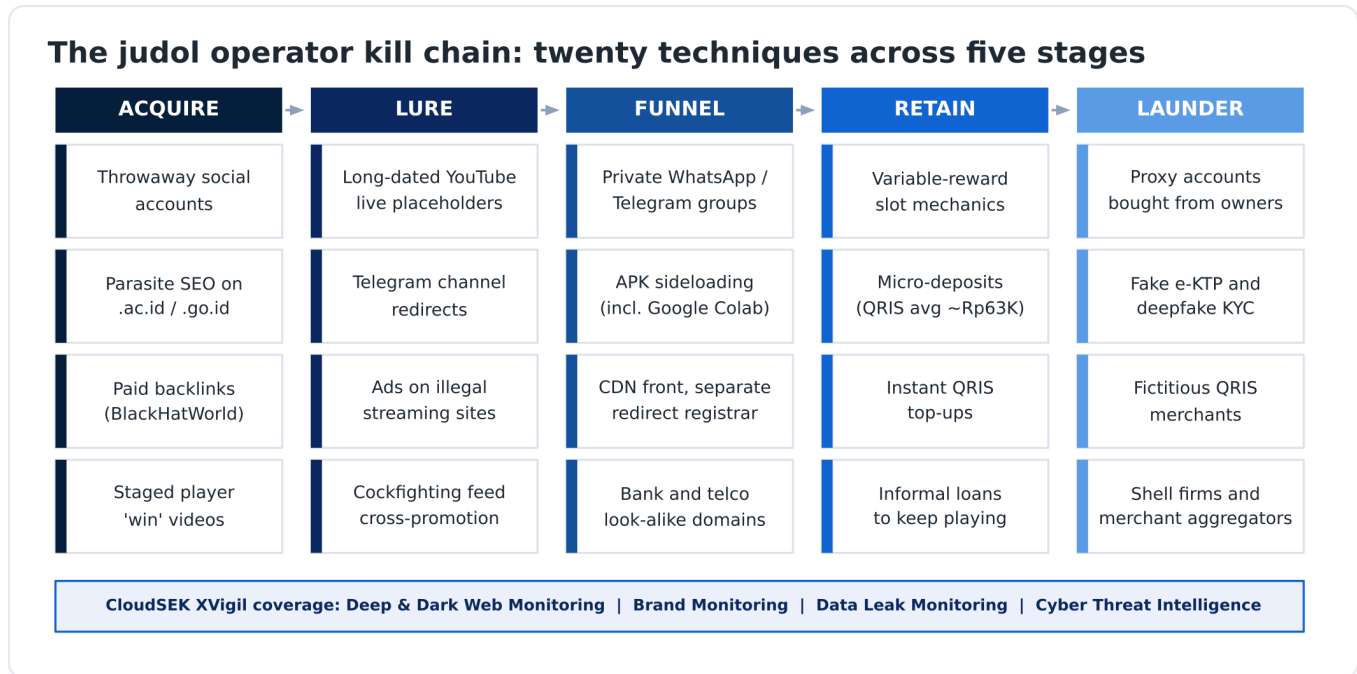


Figure 6. The judol operator kill chain as observed in CloudSEK XVigil captures.

Stages 1 and 2: getting noticed

Technique	How it works	Why it persists
Throwaway social accounts	New Facebook, Pinterest, YouTube and TikTok accounts carrying "slot gacor" branding and redirect links.	Replacements appear faster than takedowns, and each account costs almost nothing to create.
Parasite SEO on .ac.id and .go.id	Gambling pages placed on neglected subdomains of university and government websites.	The host's search reputation ranks the pages while the main site stays untouched, so owners rarely notice.
Paid backlinks	Backlink packages for Indonesian gambling keywords sold openly on BlackHatWorld, a surface web SEO forum.	The market is public and outside Indonesian jurisdiction.
Long-dated live placeholders	YouTube live streams scheduled far in the future, with gambling promotion on the waiting screen and a link in the description.	The placeholder can stay visible for long periods with no active broadcast to review.
Telegram to WhatsApp chains	Public Telegram channels post daily results and tips, then move followers into private groups.	Onboarding and deposit instructions happen in encrypted channels that platforms cannot inspect.
Ads on illegal streaming sites	Promotion disguised as entertainment, including adverts on illegal film streaming sites, memes and fake win testimonials, as documented by PPATK.	The adverts run where platform advertising rules do not apply.

Stage 3: disappearing from view

Technique	How it works	Why it persists
Split hosting	A content domain served through a CDN such as Cloudflare, with the wagering redirect registered separately, observed through Dynadot.	Blocking one layer leaves the other working; disruption needs both at once.
Look-alike domains	Domains echoing Indonesian bank, telecom and e-wallet brands.	Truncated mobile URLs hide the difference, and the impersonated brand carries the reputational damage.
APK sideloading	Gambling apps distributed as Android installation files outside official stores, including through Google Colab.	A google.com address passes casual trust checks, and the host has no gambling-specific screening.

Stages 4 and 5: keeping players, moving money

Technique	How it works	Why it persists
Variable rewards	Slot mechanics with unpredictable payouts, promoted with "gacor" claims that a game is about to pay.	The reward schedule encourages compulsive play.
Micro-deposits	QRIS deposits averaging about Rp63,400 in 2025.	Small, frequent payments blend into everyday commerce.
Informal loans	Players borrow outside the formal banking system to keep playing.	Debt extends losses beyond the player's income.
Nominee accounts	Bank and e-wallet accounts in other people's names, often bought from their owners, collect deposits.	The account holder of record is not the operator.
Fictitious merchants and shell firms	PPATK has identified proxy accounts bought from their owners, fake e-KTP identity cards and deepfakes used to pass bank verification, plus shell companies, fictitious merchants and merchant aggregators that disguise deposits as trade.	Deposits look like ordinary commerce, and identity checks are defeated at the point of account opening.

CloudSEK Researcher Insight: the waterbed goes digital

Every stage above depends on at least one foreign or general-purpose service with no specific duty toward Indonesian law: content delivery networks, domain registrars, video platforms, notebook hosting, encrypted messaging and offshore corporate structures. Pressure on one provider moves traffic to another. This is the technical equivalent of the regional displacement described in Chapter 2.

5. When the Gatekeepers Opened the Gate

The Ministry of Communication and Digital Affairs (Komdigi, formerly Kominfo) maintains the list of sites that Indonesian internet providers must block. In late October and early November 2024, Jakarta police revealed that people inside that process had been selling protection from it.

Working from a shophouse in Bekasi that investigators called a "satellite office", the group kept around 1,000 of the roughly 5,000 gambling sites it was meant to report for blocking online in exchange for payment. A suspect told police the fee was about Rp8.5 million per site. Of the first 11 people arrested, 10 were ministry employees or expert staff. The prosecution's indictment later stated that one of the men since convicted, Adhi Kismanto, had failed the ministry's selection for expert staff because he lacked a degree, but was hired anyway and tasked with compiling gambling sites for the blocking team.

The Komdigi blocklist case in five figures



Sources: Polda Metro Jaya statements reported by detiknet, Republika and Bisnis Indonesia, November 2024; South Jakarta District Court, November 2025.

Figure 7. The Komdigi blocklist case in five figures.

In November 2025, the South Jakarta District Court convicted four defendants under the Electronic Information and Transactions (ITE) Law, sentencing one to nine years and three to eight years in prison. The prosecution's indictment, read in May 2025, had alleged that the then minister, Budi Arie Setiadi, was to receive half of the proceeds and that Adhi Kismanto had been hired because of his intervention. He was not charged, and the verdict did not name him as a party to the offence. Both facts are part of the public record.

Why the block counts need an asterisk

Block counts measure volume, not integrity. Figures published for 2024 cover a period in which part of the blocking process was compromised. Regulators, banks and foreign counterparts relying on those counts should treat them with care, and blocking systems should be audited for who can remove a site from the list, not only for how many sites are added.

What the crackdown has won

Enforcement has produced measurable results. PPATK reports that it halted transactions on 5,762 accounts belonging to gambling operators, and that courts have ordered Rp588.62 billion in gambling funds forfeited to the state by final rulings. Between 2025 and the first half of 2026, PPATK delivered 1,479 financial analysis reports across all offence types to law enforcement. Indonesia's new Criminal Code (Law No. 1 of 2023), in force since 2 January 2026, sets out gambling offences in Articles 426 and 427, and Article 27(2) of the ITE Law separately prohibits distributing online gambling content.

What it has not yet touched

- ◆ **Proceeds.** The draft Asset Forfeiture Bill lists 13 offence types and, as of September 2026, online gambling is not among them, although members of Commission III have said the list may change, and the committee aims to pass the bill on 15 December 2026. Forfeiture is already possible under Articles 64 to 67 of the Anti-Money Laundering Law, which Coordinating Minister Yusril Ihza Mahendra said in November 2025 are rarely applied to their full extent.
- ◆ **Encrypted funnels.** Onboarding in private WhatsApp and Telegram groups is invisible to content moderation.
- ◆ **Foreign infrastructure.** Hosting, domain registration, app distribution and currency conversion take place with providers that Indonesian authorities can ask, but not compel, to act.

6. Connecting the Dots: Nine Patterns

Each preceding chapter describes one layer of the system. Read together, they show nine patterns. Some are supported directly by published data; others are analytical judgements based on how data points align in time and place. Where two trends coincide, this report treats the coincidence as a reason for joint investigation, not as proof of cause.

Nine patterns across five layers of evidence

Each filled dot marks a layer of evidence the pattern draws on

		Money	Region	People	Technology	Institutions
P1	Compression, not collapse	●	●	●	●	●
P2	From market to host	●	●	●	●	●
P3	Trafficking signal follows relocation	●	●	●	●	●
P4	Satellite links as shared infrastructure	●	●	●	●	●
P5	Raids displace, financial action depletes	●	●	●	●	●
P6	Poverty and debt as fuel	●	●	●	●	●
P7	The blocklist's single point of failure	●	●	●	●	●
P8	Labour flows in both directions	●	●	●	●	●
P9	The border next door	●	●	●	●	●

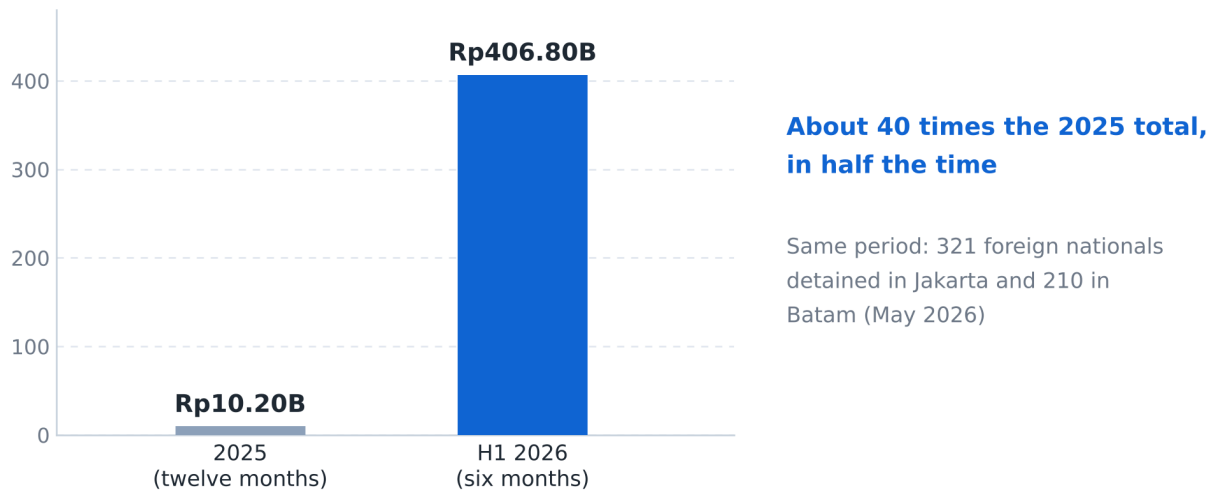
Analysis: CloudSEK, based on the sources cited in this report.

Figure 8. Nine patterns and the evidence layers each draws on.

- P1 Compression, not collapse.** Turnover fell in 2025 and again in the first half of 2026, while deposit counts rose sharply and deposits migrated to the payment rail with the smallest average ticket. PPATK credits part of the rise in counts to better detection, which itself shows how much activity sits in small transactions. Its description of the pattern, more frequent, more dispersed and smaller, is the profile of a market adapting to detection thresholds.
- P2 From market to host.** The May 2026 Jakarta hub served foreign players, and the Batam operation ran investment fraud. The Jakarta hub's roughly two-month life places its start weeks after the January 2026 exodus of workers from Cambodia's compounds. As neighbouring jurisdictions closed, Indonesia began to host the operating layer of the regional industry. Enforcement designed to protect Indonesian consumers will not, on its own, address operations that target other countries from Indonesian soil.
- P3 The trafficking signal follows the relocation.** PPATK's trafficking-indicated transactions rose from Rp10.20 billion across all of 2025 to Rp406.80 billion in the first half of 2026, the same period in which Indonesia recorded its largest detentions of foreign gambling and fraud workers. The data does not show that the two are linked, and part of the rise may reflect improved detection, but the alignment is strong enough to justify analysing gambling and trafficking cases together.

Transactions flagged by PPATK as linked to human trafficking

Rp billion. Indicated amounts are analytical flags, not court findings



Source: PPATK public report, 26 August 2026; Indonesian National Police and AP reporting, May 2026.

Figure 9. Transactions indicated by PPATK as linked to human trafficking, 2025 and the first half of 2026.

- P4 Satellite links as shared infrastructure.** Starlink equipment appears at three separate points in this report: 30 sets seized at KK Park, more than 2,500 kits disabled by SpaceX in Myanmar, and equipment seized in an Oecussi hotel search. Regional internet registry data cited by AFP ranked Starlink as Myanmar's top provider by traffic every day from 3 July to 1 October 2025. Satellite links let compounds operate outside national telecommunications controls. Starlink has been commercially available in Indonesia since May 2024, which makes provider-level cooperation a practical enforcement channel here as well.
- P5 Raids displace, financial action depletes.** Physical raids moved people and equipment; financial and legal action removed resources and leaders. After the KK Park raid, most buildings were still standing and 14 of 21 nearby compounds had expanded. Within about ten days of Chen Zhi's arrest following the Prince Group sanctions, Indonesia's embassy recorded a surge of Indonesian workers leaving Cambodian compounds. In Indonesia, final court forfeitures of Rp588.62 billion equal about 1.6% of the deposits recorded in 2025 alone, and existing forfeiture powers under the Anti-Money Laundering Law are rarely used in full. The strongest lever is the one Indonesia has used least.
- P6 Poverty and debt as fuel.** Most players earn under Rp5 million a month, the poorest spend most of their income on gambling, and millions carry informal debt. Enforcement against supply cannot succeed on its own while demand is sustained by financial stress.
- P7 The blacklist's single point of failure.** A blacklist is only as strong as the people who can remove entries from it. In the Komdigi case, according to the indictment, a man who had failed the ministry's screening was still able to sort which of 5,000 sites were reported for blocking. The weakness was procedural, not technical.
- P8 Labour flows in both directions.** Indonesians work inside compounds abroad while foreign nationals staff hubs in Jakarta and Batam. Cambodian immigration data cited in December 2024 counted 89,000 Indonesians with residence permits, more than five times the number registered with the embassy, and most of the embassy's legal cases there involve online fraud. By 5 May 2026, 8,002 Indonesians leaving Cambodian compounds had registered with the embassy in Phnom Penh; in the same week, Indonesian authorities detained 531 foreign nationals in Jakarta and Batam. Indonesia is a source, a destination and a host country for the same regional economy, which gives it standing on repatriation, recruitment and prosecution at once.
- P9 The border next door.** Oecussi is enclosed by Indonesian territory on land. A licensed gaming regime and a UN-documented organised crime presence operated there in 2025. Border and financial monitoring in East Nusa Tenggara belongs in any regional assessment of this threat.

7. Breaking the Cycle: Who Can Do What

Enforcement removes supply. The patterns above show that it also moves supply, and that demand, finance and institutional integrity determine how quickly it returns. The measures below are grouped by who can act on them.

For government: hit the balance sheet

- **Target the proceeds.** Add online gambling to the predicate offences in the draft Asset Forfeiture Bill, so that proceeds can be pursued as well as operators.
- **Link the case files.** Analyse gambling, fraud and trafficking cases jointly, given the parallel rise in trafficking-indicated transactions and foreign-run hubs in 2026.
- **Audit removal rights.** Review who can exempt or delist a site in the national blocking system, with what approval and with what logging.
- **Treat, do not only punish.** Divert first-time, low-income players identified through data matching toward financial counselling and treatment. Gambling disorder is recognised in the WHO's ICD-11 classification (code 6C50), which gives BPJS Kesehatan a basis for coverage.
- **Screen returnees and curb recruitment.** Coordinate screening and repatriation of Indonesians leaving compounds in Cambodia, Myanmar and the Philippines, and counter the voluntary recruitment into overseas scam and gambling work that the Foreign Ministry has identified.

For banks: watch the small payments

- **Screen new merchants.** Apply enhanced beneficial-ownership checks to newly onboarded QRIS merchants in higher-risk categories, where PPATK has identified fictitious merchants.
- **Monitor pattern, not only size.** High counts of small inbound QRIS payments to new merchants are the signature of the 2025 shift.
- **Watch your own brand.** Look-alike domains and apps that imitate a bank damage customer trust independently of any payment exposure.
- **Share indicators quickly.** Nominee accounts rotate faster than individual reporting cycles; early sharing with PPATK and peer institutions matters.

For platforms: pull the plug faster

SpaceX's disabling of more than 2,500 Starlink kits in Myanmar showed how quickly a provider can act once misuse is identified. The same applies to the content delivery networks, domain registrars, video platforms, file and notebook hosts, and messaging services described in Chapter 4. Structured, evidence-based referrals make that action easier to take.

For media: headlines that hold up

Report flagged welfare households as leads, not confirmed gamblers. Distinguish allegations aired in court from findings of the court. Attribute turnover, deposits, depositors and identified players to the specific PPATK release, because these measures differ and are often confused.

For families: spot it, stop it, report it

- **Recognise the pitch.** Any site, app or group promising a "gacor" slot or guaranteed wins is gambling promotion, whatever it calls itself.
- **Protect your identity.** Never lend, rent or sell a bank account, e-wallet or ID card. Nominee accounts are central to how gambling money moves, and the account holder carries the legal risk.
- **Check children's devices.** Look for games and apps with top-up features and for accounts linked to a parent's payment method.
- **Report it.** Report gambling content to Komdigi at aduankonten.id, and illegal online lending to the Financial Services Authority (OJK) on 157.

8. Seeing It First: Closing the Intelligence Gap

Nearly every technique in Chapter 4 was visible before it was reported: a gambling page on a university subdomain, a look-alike banking domain, a vendor's listing on a public forum, a Telegram channel moving followers into private groups. None required a data breach or an informant to find. They required continuous, correlated monitoring of the places where this ecosystem operates.

That is the discipline this investigation relied on, and it is what CloudSEK XVigil is built to provide. What XVigil surfaces for any organisation depends on the assets and watchwords it registers, from brand names and domains to product names, executives and sector keywords.

What this report observed	XVigil capability	How it surfaces
Look-alike bank, telco and e-wallet domains	Brand Monitoring (fake domains)	At registration or first use of a matching domain
Gambling pages on .ac.id and .go.id subdomains	Brand Monitoring with Cyber Threat Intelligence	When institutional domains are registered as monitored assets
Backlink and SEO vendor listings	Deep & Dark Web Monitoring	Forum posts matching watchlist keywords
Telegram channels and redirect chains	Deep & Dark Web Monitoring (Telegram and Discord coverage)	Channel activity matching watchlist keywords
Rogue social profiles and impersonating apps	Brand Monitoring (social profiles and fake apps)	Handles, listings and downloads using protected brand assets
Traded ID documents and account credentials	Data Leak Monitoring and Deep & Dark Web Monitoring	Listings that reference monitored organisations

The last word

Indonesia's response to online gambling has produced the first recorded decline in turnover and some of the region's largest enforcement actions. The system it faces has adapted by becoming smaller, faster and more mobile, and by moving part of its operating base into Indonesia itself. Keeping pace requires the same qualities on the defending side: continuous visibility, shared data, and action aimed at money as well as machines.

One question for every technology and security leader

How much of what this report describes would your organisation have found on its own, and when? If the answer is after the news broke, that is the gap. CloudSEK XVigil moves discovery forward to the forum post, the domain registration and the first impersonating profile, before customers are exposed. To see what XVigil finds for your brand, domains and customers, contact the CloudSEK team at cloudsek.com.

Glossary

Judol	Indonesian shorthand for judi online, online gambling.
Slot gacor	Slang for a slot game promoted as "hot" or about to pay out.
PPATK	Pusat Pelaporan dan Analisis Transaksi Keuangan, Indonesia's Financial Transaction Reports and Analysis Centre (the national financial intelligence unit).
QRIS	Quick Response Code Indonesian Standard, Bank Indonesia's national QR code payment standard, used by merchants of every size.
Komdigi	Ministry of Communication and Digital Affairs (formerly Kominfo), responsible for blocking unlawful online content.
Kemensos, bansos, KPM	Ministry of Social Affairs; bantuan sosial (social assistance); Keluarga Penerima Manfaat (a beneficiary household).
Sembako, PKH	Indonesia's food assistance programme and its conditional cash transfer programme (Program Keluarga Harapan).
OJK	Otoritas Jasa Keuangan, Indonesia's Financial Services Authority.
BPJS Kesehatan	Indonesia's national health insurance agency.
DEN	Dewan Ekonomi Nasional, Indonesia's National Economic Council.
Pinjol	Pinjaman online, app-based consumer lending, both licensed and unlicensed.
KUHP	Indonesia's Criminal Code. The new Code (Law No. 1 of 2023) took effect on 2 January 2026.
RUU Perampasan Aset	The draft Asset Forfeiture Bill under discussion in the House of Representatives.
POGO, PAGCOR	Philippine Offshore Gaming Operator, a licensed category of online gambling company serving players abroad; PAGCOR is the Philippine gaming regulator.
UNODC, OHCHR	United Nations Office on Drugs and Crime; Office of the UN High Commissioner for Human Rights.
OFAC	Office of Foreign Assets Control, the US Treasury body that administers sanctions.
TTP	Tactics, techniques and procedures: how an adversary operates in practice.
Parasite SEO	Placing content on a trusted third-party website to borrow its search engine ranking.
CDN	Content delivery network, a service that serves websites from distributed servers and can conceal where a site is hosted.
APK, sideloading	An Android application package; sideloading is installing one from outside an official app store.
Nominee (mule) account	A bank or e-wallet account held in one person's name but used by another to move funds.
USDT, P2P	Tether, a US dollar stablecoin; P2P refers to peer-to-peer trading used to convert it to or from local currency.
ITE Law	Indonesia's Electronic Information and Transactions Law; Article 27(2) prohibits distributing online gambling content.
C4ADS	A US non-profit that analyses illicit networks and conflict using open data.
TLP:CLEAR	Traffic Light Protocol label meaning the information may be shared without restriction.

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