

## **Criminal Liability Of Perpetrators Who Promote Online Gambling Based On (A Study Of Decision Number 91/Pid.Sus/2024/Pn Lsm)**

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**Abstract.** The development of information technology has driven the shift of crimes into cyberspace, including the increasingly widespread practice of online gambling. Promotion through social media by influencers has expanded public access to gambling activities and generated serious social and legal impacts. This study examines the regulation and criminal liability of perpetrators promoting online gambling in Indonesia through the analysis of the Lhokseumawe District Court Decision Number 91/Pid.Sus/2024/PN Lsm. The method employed is normative juridical research with statutory, conceptual, and case study approaches. The results of the study indicate that the regulation of online gambling promotion is governed under Articles 303 and 303 bis of the Indonesian Criminal Code, Law Number 7 of 1974 concerning Gambling Control, and Article 27 paragraph (2) in conjunction with Article 45 paragraph (3) of the Electronic Information and Transactions Law as amended by Law Number 1 of 2024. Criminal liability is based on the elements of conduct and fault (*mens rea*), whereby perpetrators may be regarded as participants or instigators. The court decision affirms that gambling-related content accessible to the public through social media fulfills the elements of a criminal offense and may be subject to sanctions in accordance with applicable legal provisions.

**Keywords:** Climate Change; Global Warming; Environmental Law; Economic Activities.

### **INTRODUCTION**

Indonesia, as affirmed in Article 1 paragraph (3) of the 1945 Constitution, is a state based on the rule of law that places the supremacy of law as the foundation for the administration of national and state life. The principle of the rule of law aims to achieve order, justice, legal certainty, and public benefit for society (Hiariej, 2024:12). In this context, criminal law plays an important role as an instrument of law enforcement that is not only repressive but also preventive, functioning as a means of social defence and social control to maintain social norms and values (Waluyo, 2008:12).

The role of criminal law as an *ultimum remedium* faces significant challenges in the digital era, where the development of information technology has given rise to complex cybercrimes that are transnational, anonymous, and have extensive impacts (Bahri, 2023:9). One of the most concerning forms is online gambling, which sociologically is categorized as deviant behavior with systemic destructive effects, impacting individuals, families, and society through social conflicts, subsequent criminal acts, and economic dependency that damages productivity (Kartini, 2021:56). This practice not only affects the individual perpetrators but also extends to the smallest social unit, namely the family, and to society at large. Gambling addiction may trigger family disintegration due to financial conflicts, encourage further criminal acts such as theft, fraud, or embezzlement to cover losses, and create economic dependency that undermines individual productivity.

The transformation of gambling into digital platforms has exponentially worsened its destructive impacts by eliminating many of the barriers associated with conventional

gambling. Online gambling offers unlimited 24/7 access, low initial costs, player anonymity, and psycho-logically designed platforms intended to create addiction (Jadidah et al., 2023). The criminalization of gambling is based on the doctrine of abstract harm, namely prohibitions grounded on the potential damage to public order and welfare. Consequently, law enforcement is directed not only at gamblers but also at organizers, bookmakers, agents, and promoters or endorsers (Hiariej, 2024:89). Therefore, the focus of law enforcement extends beyond players to all parties enabling the growth of online gambling. This includes platform operators, bookmakers, agents, and particularly the promoters or endorsers who serve as the frontline actors in expanding the market reach of online gambling.

The modern online gambling industry has developed in a structured manner through digital marketing strategies on social media, including the recruitment of influencers to promote gambling websites to millions of followers (Desriwaty, 2013:5). Promotional methods are carried out both openly and covertly by exploiting parasocial relationships that make followers more easily influenced (Fridiana & Westra, 2021:2255). This phenomenon normalizes gambling-related content and blurs the line between advertisements and organic content, particularly among vulnerable adolescents. Although gambling has been prohibited under Articles 303 and 303 bis of the Indonesian Criminal Code, Law Number 7 of 1974, and Government Regulation Number 9 of 1981, these regulations are considered inadequate to address the complexity of gambling in the digital era.

The legislature subsequently enacted the Electronic Information and Transactions Law (ITE Law). Over time, the ITE Law has undergone several amendments, most recently through Law Number 1 of 2024. This regulation specifically targets the dissemination of illegal content in cyberspace. Article 27 paragraph (2) of the ITE Law expressly provides: “Any person who intentionally and without authority distributes, transmits, and/or makes accessible Electronic Information and/or Electronic Documents containing gambling content.”

Criminal sanctions for the promotion of online gambling are further strengthened under Article 45 paragraph (3), which imposes imprisonment of up to ten years and/or a maximum fine of IDR 10 billion, forming the juridical basis for prosecuting both organizers and promoters of online gambling (Manaroinson et al., 2024). However, online gambling promotions are often facilitated by influencer agencies and social media platforms that fail to properly filter content. Therefore, law enforcement must also target business entities that profit from such activities, not merely individual perpetrators (Sirait, 2020:67). The greatest challenge lies in evidentiary issues, as cybercrimes rely on fragile electronic evidence that can easily be deleted or manipulated, thereby requiring expertise in digital forensics, account authentication, content preservation through hashing techniques, and strict maintenance of the chain of custody (Permana & Utomo, 2023:45). Failure to preserve the chain of custody may weaken the evidentiary value because courts cannot treat digital evidence in the same manner as physical evidence. Without standardized forensic procedures, digital evidence can easily be challenged on technical grounds, enabling perpetrators to escape criminal liability despite being substantively guilty (Mason & Seng, 2023:123).

The Decision of the Lhokseumawe District Court Number 91/Pid.Sus/2024/PN Lsm constitutes a highly relevant and compelling case study for analysis. The decision concerned a 19-year-old university student, Naiza Maulia binti Mahmuddin, who was lawfully and

convincingly proven guilty of promoting the online gambling website “zeonsawer.com” through her personal Instagram account, @naiza\_17. The defendant received payment amounting to IDR 200,000 for posting an Instagram story containing a link to the gambling website for seven days. The defendant’s conduct was uncovered through cyber patrol activities conducted by the Cyber Team of the Aceh Regional Police. During the trial, the panel of judges based its decision on Article 45 paragraph (3) in conjunction with Article 27 paragraph (2) of the ITE Law. The judges considered that the element of “intentional conduct” had been fulfilled because the defendant was aware that gambling was prohibited but nevertheless committed the act in order to obtain financial benefit. The defendant was ultimately sentenced to six months’ imprisonment and a fine of IDR 500,000, subsidiary to fifteen days of detention. This decision reflects how courts have begun applying the ITE Law to prosecute the phenomenon of online gambling endorsers.

One of the primary challenges is the “lack of adequate regulations governing the technology used in online gambling, as well as limitations in cross-border law enforcement. In this context, it is important to analyze how criminal law regulations can be applied more effectively against perpetrators promoting online gambling, as well as how Indonesian criminal liability mechanisms address cybercrimes, particularly online gambling. The presence of advanced technology and internet networks has had significant impacts on society, both positive and negative. Online gambling represents one of the negative impacts in the form of cybercrime” (Jadidah et al., 2023).

The difference between previous research entitled Criminal Liability for Perpetrators Promoting Online Gambling Through Social Media Platforms and the present study entitled Criminal Liability of Perpetrators Who Promote Online Gambling (A Study of Decision Number 91/Pid.Sus/2024/PN Lsm) is that previous studies focused on perpetrators promoting online gambling through social media platforms, whereas the present study analyzes the legal regulations concerning gambling and the various forms of criminal liability.

Based on the issues above, the main problems addressed in this study are How are criminal law regulations concerning perpetrators promoting online gambling in Indonesia formulated? And how is criminal liability imposed on perpetrators promoting online gambling in Indonesia?

## **RESEARCH METHODS**

This study employs a normative juridical method with a focus on library research through the analysis of statutory regulations, court decisions, legal doctrines, and the opinions of relevant legal scholars, using a conceptual approach to examine the regulation of gambling offenses, particularly online gambling, as well as a case approach through the analysis of the Lhokseumawe District Court Decision Number 91/Pid.Sus/2024/PN Lsm, which has obtained permanent legal force. The legal materials used in this study consist of primary legal materials in the form of the 1945 Constitution, statutory regulations related to gambling and the Electronic Information and Transactions Law, as well as provisions of the Indonesian Criminal Code; secondary legal materials in the form of journals, books, and opinions of legal experts; and tertiary legal materials in the form of legal dictionaries, encyclopedias, and other supporting sources. The technique of collecting legal materials was carried out through the identification and compilation of relevant legal materials, which were then analyzed in an integrated manner and interpreted to obtain a comprehensive understanding of the research problems. The analysis of legal materials

was conducted qualitatively and descriptively using deductive reasoning.

## **ANALYSIS AND DISCUSSION**

### **Criminal Law Regulations Against Perpetrators Promoting Online Gambling**

The development of information and communication technology has transformed the form and characteristics of crime, including gambling, which has now evolved into online gambling with cross-border reach and high complexity. Sociologically, gambling is categorized as deviant behavior that has broad impacts on individuals, families, and communities, as it causes addiction, economic losses, and social as well as moral disruption (Kartini, 2021:68). From a criminological perspective, this practice is viewed as a violation of ethical and moral norms that requires firm and preventive criminal policies by the state (Ravena & Kristian, 2017:60).

In Indonesia, gambling is explicitly prohibited under Article 303 of the Indonesian Criminal Code, which emphasizes the elements of gaming, valuable stakes, and the predominance of chance (Soerodibroto, 2006:255), with criminal sanctions imposed for every violation (Moeljatno, 2002:95). These provisions are further strengthened by Law Number 7 of 1974 and Government Regulation Number 9 of 1981, which revoked all gambling licenses. However, digitalization has transformed conventional gambling into a technology-based transnational crime categorized as a Computer-Related Crime (Arief, 1996:62), making it difficult to reach through national jurisdiction due to its anonymous and transnational nature (Awaeh, 2017:165). The main characteristics of online gambling include high accessibility and 24/7 operation through digital devices, anonymity of perpetrators through the use of VPNs or proxies to conceal their identities, and the existence of digital evidence such as log files, transaction histories, screen-shots, and server data, which differ from conventional physical evidence.

Within this modern system, influencers or public figures have become important links in the dissemination of online gambling content. They act as promoters who distribute information and build followers' trust to participate in gambling activities (Pakpahan et al., 2025:38). Fricillia Geybi Manaroinsong asserts that massive promotional activities conducted by influencers constitute active support for the continuity of online gambling, thereby making them legal subjects directly involved in criminal activities (Manaroinsong et al., 2024). The complexity of digital networks, cross-border operations, and technological dependence requires the Electronic Information and Transactions Law (ITE Law) to function as a *lex specialis* in prosecuting promoters, since the conventional Criminal Code does not accommodate cyber jurisdiction and digital evidence. Article 27 paragraph (2) of the ITE Law, as amended by Law Number 1 of 2024, explicitly criminalizes intentional and unauthorized acts of distributing, transmitting, or making gambling-related content accessible to the public, carrying a maximum penalty of ten years' imprisonment and fines of up to IDR 10 billion (Ramli, 2004:90). The element of "making accessible" becomes the core basis of liability, since every upload of promotional links, videos, or Instagram stories fulfills the elements of the offense.

Furthermore, an analysis of cyber offenses identifies that the promotion of online gambling contains elements of intentional conduct (*mens rea*), cyber fraud, and money laundering. Financial motives are reflected in endorsement fees, cyber fraud arises from false promises of winnings, and money laundering occurs through digital transfers derived from gambling proceeds (Kristanto & Rakhmat, 2025). The old Criminal Code, particularly Articles 303 and 303 bis, distinguished the liability of bookmakers and gamblers by

imposing a maximum sentence of ten years for bookmakers and four years for gamblers (Soerodibroto, 2006:260). However, these provisions proved ineffective in addressing cybercrime because they did not accommodate cross-border jurisdiction and digital evidence. Consequently, the new Criminal Code (Law Number 1 of 2023, Articles 426–427) and the ITE Law have become the primary legal instruments governing the technical aspects of disseminating gambling content.

Subjective elements (*mens rea*) and objective elements (*actus reus*) constitute the primary determinants of promoters' criminal liability. Intentional conduct is demonstrated through economic motives in the form of endorsement fees, while the *actus reus* is fulfilled through the posting of content accessible to the public. The object of the offense consists of Electronic Information, such as URL links, QR codes, screenshots, or persuasive narratives, thereby positioning influencers as active subjects in the dissemination of illegal content (Rizkita, 2023). The doctrine of participation under Articles 55 and 56 of the Criminal Code places promoters as *medepleger* (co-perpetrators) alongside bookmakers and as *uitlokker* (instigators) toward their followers, thereby establishing multiple forms of criminal liability (Fridiana & Westra, 2021). Accordingly, violations of Article 27 paragraph (2) of the ITE Law may result in a maximum sentence of ten years' imprisonment and/or a fine of up to IDR 10 billion (Gunawan et al., 2023). This entire legal framework confirms that influencers are not merely part of the distribution chain, but active legal subjects who bear full responsibility for the cybercrimes they facilitate, reflecting the state's commitment to enforcing law in the digital sphere and ensuring that cyberspace does not become a lawless domain.

### **Criminal Liability of Perpetrators Promoting Online Gambling**

Criminal liability constitutes a fundamental concept that connects criminal acts with the imposition of sanctions, requiring both a prohibited act and fault on the part of the perpetrator as the basis for criminal punishment. In the context of online gambling promotion, this concept becomes crucial because such promotion is widely conducted through digital media and has significant impacts on society. The principle of *geen straf zonder schuld* affirms that punishment may only be imposed where there is a causal relationship between the act, the fault, and the resulting consequences, and where the perpetrator possesses the capacity for responsibility (*toerekeningsvatbaarheid*) (Moeljatno, 2002:105). Doctrinally, criminal liability requires the existence of both a criminal act (*actus reus*) and fault (*mens rea*), whereby the act must fulfill the elements of the offense and the fault reflects the blameworthy mental attitude of the perpetrator.

Fault in criminal law encompasses both intent (*dolus*) and negligence (*culpa*), whereas paid online gambling promotions conducted by influencers generally demonstrate intentional conduct motivated by the aim of obtaining economic benefits (Hiariej, 2024:180). In cyber-crimes involving interconnected networks of perpetrators, the doctrine of participation (*deelneming*) expands criminal liability to parties involved in the criminal offense, including operators, programmers, agents, and influencers, who may be classified as principal perpetrators, co-perpetrators, instigators, or accomplices according to their respective contributions (Farid, 2014:75).

Criminal liability for perpetrators promoting online gambling particularly emphasizes proof of intentional conduct motivated by economic interests. Influencers act as legal subjects who possess the capacity to influence the behavior of their followers through digital content that they create and disseminate. In this context, gambling is no longer

narrowly understood as physical betting activities, but also encompasses games based on integrated electronic systems accessed through internet networks (Kartini, 2021:68). Proof of the element of “intentional conduct” may be demonstrated through the receipt of compensation or endorsement fees as payment for promotional services, indicating a conscious intention to facilitate gambling activities (Manaroinsong, 2024). The element of “without authority” emphasizes the unlawful nature of such conduct, considering that all forms of gambling are absolutely prohibited in Indonesia under the applicable laws and regulations (Kristanto, Kiki & Rakhmat, 2025:28).

In cyberspace, the proof of criminal offenses is highly dependent on the validity of electronic evidence, such as content upload log files, records of endorsement payment transfers, and negotiation communications between gambling operators and influencers. The validity of electronic evidence requires accountable digital forensic procedures as well as the application of the chain of custody principle to ensure the integrity and authenticity of the data as evidence before the court (Permana & Utomo, 2023:65). Without strict evidentiary procedures, digital evidence remains vulnerable to manipulation, thereby weakening the law enforcement process.

Within the framework of the doctrine of participation, influencers may generally be classified as co-perpetrators (*medepleger*) because there is conscious cooperation with gambling operators through promotional agreements concerning gambling websites. The shared intention between gambling operators and influencers to ensure the successful dissemination of gambling-related content demonstrates the existence of *bewuste samenwerking* as a requirement for co-perpetration (*medepleger*) (Farid & Hamzah, 2006:165). Furthermore, influencers may also be classified as instigators (*uitlokker*), because they utilize social influence, testimonials, or persuasive narratives to encourage their followers to engage in gambling activities (Fridiana & Westra, 2021). Accordingly, influencers do not merely function as conveyors of information, but also as actors who stimulate the criminal intent of others.

Future criminal policy, particularly through the new Criminal Code and the amendments to the ITE Law, demonstrates a strict criminal policy direction in combating digital gambling.

Severe criminal sanctions reflect an orientation toward social defence and general prevention against the social and economic harms caused by online gambling. Barda Nawawi Arief emphasizes that criminal policy must be capable of addressing modern crimes that are transnational and technology-based (Arief, 1996:40). Bambang Waluyo likewise stresses that the purpose of punishment is not merely retributive, but also preventive and rehabilitative in order to protect society from the moral and economic harms caused by criminal offenses (Waluyo, 2008:35).

Criminal liability for perpetrators promoting online gambling requires comprehensive proof regarding both the elements of the act and fault, as well as the application of the doctrine of participation to prosecute all actors involved in cybercrime networks. Influencers are not merely positioned as intermediaries of information, but as active legal subjects who significantly contribute to the commission of gambling offenses. Therefore, law enforcement against online gambling promoters constitutes a manifestation of the state’s commitment to maintaining legal order in the digital sphere and ensuring that cyberspace does not become a lawless domain.

## CONCLUSION

The criminal law regulation concerning promoters of online gambling in Indonesia adopts a layered scheme between *lex generalis* and *lex specialis*, whereby Articles 303 and 303 bis of the former Indonesian Criminal Code provide the general definition of gambling, while Article 27 paragraph (2) in conjunction with Article 45 paragraph (3) of Law Number 1 of 2024 (the Second Amendment to the Electronic Information and Transactions Law) serves as the primary legal instrument to prosecute influencers who distribute, transmit, or make accessible electronic information containing gambling-related content, carrying penalties of up to ten years' imprisonment and fines of IDR 10 billion. Legal reform through Articles 426 and 427 of the New Criminal Code further emphasizes criminal sanctions against the commercial facilitation of gambling within the digital context. Such criminal liability is based on the element of intentional conduct (*opzet als oogmerk*) aimed at obtaining economic benefits, and doctrinally, promoters may be classified as co-perpetrators (*medepleger*) due to their shared intention with gambling operators, as well as instigators (*uitlokker*) because they utilize social influence to encourage followers to engage in criminal gambling activities, as reflected in Decision Number 91/Pid.Sus/2024/PN Lsm of the Lhokseumawe District Court, which emphasized the concrete act of "making accessible" gambling-related content to the public.

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