



Transnational Crime in Cambodia and Indonesia: Strengthening Regional and National Responses

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By Jeselyn and Danielle Lynn Goh

SYNOPSIS

Transnational crime networks in Cambodia and Indonesia have been responsible for heinous cybercrime, including illegal online gambling and scams. These networks target vulnerable populations and undermine human security. Addressing these challenges requires stronger law enforcement cooperation, regulatory reforms, and coordinated regional and national strategies to dismantle the criminal networks.

COMMENTARY

In Southeast Asia, transnational crime has long posed a significant challenge. These include illicit drugs, human trafficking, cyber scams, and illegal gambling. Cybercrime has surged in recent decades with technological advancements and increasing global connectivity. In particular, operators of illicit gambling networks have expanded their operations into countries such as Cambodia, Lao PDR, the Philippines, and the border regions of Myanmar.

Many of these centres are not limited to illegal gambling alone – they also function as cyber scam hubs. These [scam centres](#) engage in a wide range of online fraudulent activities, including investment scams, romance scams, and phishing operations. The current landscape of organised crime in Southeast Asia thus reflects a convergence of illicit gambling and sophisticated cyber scamming operations, often managed by the same transnational criminal networks.

Transnational Crime in Indonesia and Cambodia

In Indonesia, [illegal online gambling](#) regained national attention when “[Consortium 303](#)”, the online gambling empire linked to former police inspector-general Ferdy Sambo, was allegedly involved in the 2022 murder of Brigadier J (aka Nofriansyah

Yosua Hutabarat). The consortium came under further scrutiny following allegations of human trafficking, with evidence suggesting a connection to trafficking cases in Cambodia.

[Victims of human trafficking](#) were reportedly sent to various locations across Cambodia, including Sihanoukville, Chinatown, Bavet, Poipet, and Phnom Penh. This case, along with the police's [efforts](#) to rebuild public trust, has opened a Pandora's box of Cambodia-linked illegal gambling operations connected to Indonesia.

It is estimated that at least [80,000 Indonesian citizens](#) are working illegally in Cambodia, having diverted from their traditional destinations of Saudi Arabia, Malaysia, Hong Kong, and Taiwan. Over [4,700 Indonesian citizens](#) involved in online scam operations were repatriated between 2020 and September 2024.

Victims of illegal gambling rings and scam centres can be lured into the “work” through [online recruitment](#), such as sham job advertisements on websites and social media. Such “recruiters” use methods such as [offering](#) higher salaries than average wages in Indonesia, and made-up job roles in Vietnamese factories.

Victims of Exploitation

While illegal online gambling has led to the emergence [of peripheral service sectors](#) in Cambodia, such as [food and beverage outlets](#), laundromats, and other informal businesses, it is important to note that these businesses are engaged in illicit activity.

Many of the individuals employed in or around these operations are victims of exploitation, deception, and coercion, particularly in scam centres that masquerade as legitimate businesses. Therefore, the supporting industries around them should be understood as part of a broader ecosystem of transnational crime that conceals and sustains illicit gambling and cyber scamming operations.

In Indonesia, at the national and societal level, the economic losses due to online gambling have cost the country about [Rp900 trillion](#) (US\$55.3 billion) annually. Gambling has an adverse impact, giving rise to criminal activities such as fraud and theft. Those who are forced to work in the illegal online gambling industry and scam centres in Cambodia often face harsh working conditions, without social protection, and face [physical and mental abuse](#).

Strengthening Regional Cooperation

At the regional level, ASEAN has [cooperated with China](#) to address illegal online gambling through knowledge exchange, help in establishing anti-fraud and anti-illicit gambling measures, and strengthening cooperation across borders.

On 19 January 2025, ASEAN ministers [committed](#) to combating illegal online gambling and cybercrime. As part of their efforts at information sharing and capacity building to meet these common threats, the ASEAN Regional Computer Emergency Response Team (CERT), based in Singapore, was established.

There have also been joint transnational operations, such as the Interpol-led

[“Maharlika III”](#), that worked with law enforcement agencies in Brunei, Indonesia, Malaysia and the Philippines to apprehend offenders and rescue the victims of human trafficking.

Further strengthening of regional cooperation, the sharing of best practices in combatting illegal gambling operations, and timely information sharing across ASEAN member states are needed.

To address these challenges, ASEAN member states must go beyond general law enforcement cooperation and take concrete steps to strengthen the implementation of the [ASEAN Convention Against Trafficking in Persons, Especially Women and Children \(ACTIP\)](#). This includes harmonising national “trafficking in persons” legislation, enhancing victim identification and protection mechanisms across borders, and establishing a regional victim referral system.

Countries should also expand the definition of trafficking to explicitly cover coercion into scam and gambling centres. [National frameworks](#) must also be regularly updated to reflect the dynamic and transnational nature of these crimes.

Country-level Enforcement and Policy

At the domestic level in Indonesia, the fundamental socio-economic factors that drive young, educated people to join the illegal online gambling sector and scam centres must be addressed, including youth unemployment and ramping up efforts to help those who have been laid off from jobs. At the same time, national campaigns and advocacy to highlight the ills of gambling can help to deter those susceptible.

Another major loophole enabling illegal gambling hubs and scam centres to operate is the unchecked role of landlords and internet service providers (ISPs) in supporting these operations. Both the [Indonesian](#) and the Cambodian governments should introduce a “zero-tolerance policy” that holds property owners criminally liable for knowingly renting spaces to gambling and scam operators.

Authorities can implement a licensing system for commercial landlords, requiring them to verify tenants’ business activities with the relevant government ministries. Additionally, ISPs should be mandated to block illegal gambling websites in real time, rather than relying on reactive requests after such sites have gone live. Failure to comply should result in severe penalties, including revocation of business licenses for landlords and ISPs.

Finally, Indonesia and Cambodia should expand their national anti-trafficking frameworks to better account for the recruitment and exploitation of young people in scam operations. This includes improved victim screening protocols for those rescued from suspected scam centres, ensuring that survivors are not criminalised or deported but instead provided access to rehabilitation, compensation, and safe repatriation.

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