JURNAL MAGISTER HUKUM UDAYANA
(UDAYANA MASTER LAW JOURNAL)
Vol. 15 No. 3 September 2026
E-ISSN: 2502-3101 P-ISSN: 2302-528x
http: //ojs.unud.ac.id/index.php/jmhu



Strengthening Legal Protection for Tourists Through Administrative and Criminal Enforcement Against Unlicensed Travel Bureaus in Bali

Putu Mahaesa Surya Putri Utami[1]

[1]Rooms Division Study Program, Bali Tourism Polytechnic, E-mail: putumahaesasuryaputriutami@ppb.ac.id.

Article Info

Submitted: 24 April 2026
Accepted: 30 September 2026
Published: 30 September 2026

Keywords:
Legal Protection; Tourists; Law Enforcement; Unlicensed Travel Bureaus; Sustainable Tourism

Corresponding Author:
Putu Mahaesa Surya Putri Utami, E-mail: putumahaesasuryaputriutami@ppb.ac.id

DOI:
10.24843/JMHU.2026.v15.i03.p04

Abstract

This study aims to analyze the implementation of administrative and criminal law enforcement against unlicensed travel bureaus and to examine legal protection mechanisms available for tourists in Bali Province. The research employs an empirical legal research method using statutory and factual approaches. Data were obtained through interviews with officials of the Bali Provincial Tourism Office and supported by relevant laws and regulations concerning tourism, electronic transactions, and consumer protection. The collected data were analyzed qualitatively and presented descriptively. The findings reveal that law enforcement against unlicensed travel bureaus has not been implemented optimally due to weaknesses in supervision and the absence of specific regulations governing online travel bureau licensing. Preventive legal protection is carried out through certification requirements, licensing supervision, and institutional monitoring, while repressive legal protection is provided through administrative sanctions, criminal prosecution, and dispute resolution mechanisms. Administrative measures may include the closure of business premises under Bali Provincial Regulation Number 1 of 2010. Furthermore, fraudulent activities committed by unlicensed travel bureaus may be subject to criminal sanctions under Article 28 paragraph (1) of Law Number 11 of 2008 concerning Electronic Information and Transactions and Article 378 of the Indonesian Criminal Code. The study concludes that strengthening administrative supervision and criminal law enforcement is essential to ensure legal certainty, consumer protection, and sustainable tourism development in Bali.

1. Introduction

According to International Journal of Health Sciences, that: "Tourism is an important component of Indonesia's economic, social, cultural, and regional development". Bali, as one of Indonesia's leading international tourism destinations, has a particularly strategic position because its tourism sector involves a broad range of business activities, including accommodation, transportation, tour guiding, food and beverage services, attractions,

and travel bureau services. The development of tourism, however, must be accompanied by an effective legal framework capable of ensuring that tourism activities are conducted responsibly and that tourists are adequately protected from unlawful practices. Legal protection is particularly important because tourists, as users of tourism services, are often in a relatively vulnerable position when entering into transactions with tourism businesses, especially where services are purchased remotely through digital platforms.[1]

The legal protection of tourists constitutes part of the responsibility of the State to guarantee security, safety, certainty, and fair treatment in tourism activities. Under Law of the Republic of Indonesia Number 10 of 2009 concerning Tourism, the Government and Regional Governments are required to provide tourism information, legal protection, security, and safety to tourists, as well as to supervise and control tourism activities in order to prevent and address negative impacts on society.[2] Furthermore, Article 26 of Law Number 10 of 2009 requires tourism entrepreneurs to provide accurate and responsible information, nondiscriminatory services, comfort, hospitality, security, and safety for tourists.[3] These provisions demonstrate that tourist protection is not merely a matter of contractual relations between tourists and tourism businesses, but also constitutes a public responsibility requiring governmental supervision and law enforcement.

The obligation to protect tourists becomes increasingly significant in the context of the rapid digitalization of tourism services. Digital platforms and social media have transformed the manner in which tourists search for destinations, select tourism services, communicate with service providers, make reservations, and conduct payments. The digital environment provides substantial benefits in terms of accessibility and efficiency, but it also creates opportunities for tourism businesses to operate without fulfilling the licensing and business standards imposed by law. Travel bureaus can market tour packages through websites, social media accounts, messaging applications, and other digital platforms without necessarily maintaining a physical office or clearly disclosing their legal status. This situation creates difficulties for tourists in verifying whether a travel bureau is legally authorized to conduct tourism business activities.

The travel bureau occupies a strategic position within the tourism industry because it functions as an intermediary between tourists and various tourism service providers. Through travel bureaus, tourists may obtain integrated tourism packages involving transportation, accommodation, destinations, guides, and other tourism services. Consequently, the legality and accountability of travel bureaus directly affect the certainty, safety, and quality of services received by tourists. A legally licensed travel bureau is subject to regulatory requirements, business standards, and governmental supervision, whereas an unlicensed operator may avoid such obligations and create

[1] Habib Adjie, "Under a Creative Commons Attribution-NonCommercial-ShareAlike 4.0 International (CC BY-NC-SA 4.0) Contradiction: Inclusion of Multiple Dispute Settlement Clauses in the Agreement," *International Journal of Criminal Justice Sciences* 18 (2023), https://doi.org/10.5281/zenodo.4756226/IJCJS.

[2] Alif Ihwan Hamonangan, Ranggi Ade Febrian, and Alif Ihwan Hamonangan, The Effectiveness of the Transportation Agency's Role in Monitoring Illegal Travel (2024), https://ejournal.yayasanpendidikandzurriyatulquran.id/index.php/AlZayn.

[3] Ade Hermawan, "Law Enforcement Against Foreign Nationals Who Exceed The Period Of Stay Permit In Indonesia," in Awang Long Law Review, vol. 7, no. 2 (2025), https://doi.org/https://doi.org/10.56301/awl.v7i2.1503.

greater risks of consumer losses, fraud, breach of contract, or difficulties in obtaining remedies.

The regulatory framework governing travel bureau activities in Bali has existed for more than a decade. Bali Provincial Regulation Number 1 of 2010 concerning Tourism Travel Services was enacted, among other reasons, to regulate tourism travel service businesses and to provide legal protection, security, and safety for tourists.[4] The regulation establishes a regional legal framework for tourism travel service activities and provides a basis for governmental supervision of business operators. Its continued relevance is particularly important because the fundamental problem of unauthorized travel bureau activities has not disappeared despite changes in the regulatory and technological environment. The development of online tourism transactions has instead created new forms of business activity that are more difficult to identify and supervise.

At the national level, the licensing and standardization of tourism businesses have also undergone significant changes following the implementation of risk-based business licensing. Minister of Tourism and Creative Economy Regulation Number 4 of 2021 concerning Business Activity Standards in the Implementation of Risk-Based Business Licensing in the Tourism Sector provides standards for travel bureau activities, including requirements relating to facilities, organizational structure and human resources, services, products, and business management. The regulation recognizes travel bureau activities as businesses that arrange and provide services for individuals or groups undertaking travel for tourism purposes.[5] Therefore, operating a travel bureau is not simply a commercial activity that can be undertaken without regulatory compliance; it is an activity subject to legal standards intended to protect both tourists and the integrity of the tourism industry.

The existence of unlicensed travel bureaus raises two interconnected legal problems. First, there is an administrative law problem concerning the authority of the Government and Regional Government to identify, supervise, control, and sanction tourism businesses that operate without the required licensing or registration. Second, there is a criminal and private-law problem when the activities of an unlicensed travel bureau cause financial losses to tourists through fraudulent representations, misleading electronic information, failure to provide promised services, or breach of contractual obligations. These two dimensions cannot be separated because administrative illegality may constitute an early indicator of a lack of accountability, while fraudulent conduct may give rise to criminal liability independently of the administrative violation.

The potential use of digital media in committing fraudulent tourism transactions further complicates the legal protection mechanism. Law Number 1 of 2024, which constitutes the Second Amendment to Law Number 11 of 2008 concerning Electronic Information and Transactions, maintains and reformulates Article 28 concerning the intentional distribution or transmission of electronic information or documents containing false or misleading information that causes material loss to consumers in electronic transactions.[6]

---

[4] I. Gusti Ngurah Dhian Prismanatha, I. Made Sepud, and I. Gusti Bagus Suryawan, "Legal Protection for Tourists on Trips to Bali," January 29, 2019, https://doi.org/10.4108/eai.21-9-2018.2281139.

[5] M. Kleden, "Human Rights in Communal Society," preprint, Yogyakarta: Lamalera, 2008.

[6] Indarwati Aminuddin et al., Best Environmental Equitable Practices (BEEP) Panduan Pengembangan Akomodasi Wisata Ramah Lingkungan, cet. I, ed. Amkieltila Estradivari (Denpasar: WWF-Indonesia, 2016).

This provision is particularly relevant where an unlicensed travel bureau promotes tourism packages online through false or misleading representations and subsequently causes material losses to tourists. The legal assessment, however, must remain fact-specific because not every failure to perform a tourism service automatically constitutes a criminal offense. A distinction must be maintained between contractual default, administrative violations, and conduct that fulfills the elements of a criminal offense.

The same consideration applies to fraud under the Indonesian criminal law framework. Since Law Number 1 of 2023 concerning the Criminal Code entered into force on 2 January 2026, the legal framework concerning conventional fraud must be considered in light of the new Criminal Code. Fraud is now regulated under Article 492 of Law Number 1 of 2023.[7] Accordingly, research conducted in 2026 should avoid relying exclusively on the former Article 378 of the Criminal Code without explaining the transition to the new criminal law framework. This development is particularly important for the present study because the article examines criminal enforcement against unlicensed travel bureaus in the contemporary legal context.

From the perspective of preventive legal protection, tourists require mechanisms that enable them to identify legitimate tourism businesses before entering into transactions. Such protection may be achieved through business licensing, business certification, standardized information, governmental supervision, public access to business legality information, and institutional monitoring. Preventive protection is important because tourists frequently make tourism-related transactions before arriving at a destination and may have limited ability to independently verify the legal status of a business operating through digital media. Preventive supervision therefore has the potential to reduce the occurrence of fraud and other consumer losses before they arise.

Conversely, repressive legal protection becomes necessary when an unlawful act has already occurred. Repressive protection may involve administrative sanctions, civil remedies, dispute resolution, and criminal law enforcement, depending on the nature and seriousness of the violation. Law Number 10 of 2009 provides administrative sanctions for tourism entrepreneurs who fail to comply with specified obligations, including written warnings, restrictions on business activities, and temporary suspension of business activities. At the regional level, Bali Provincial Regulation Number 1 of 2010 provides a legal basis for administrative action against tourism travel service businesses that do not comply with applicable requirements. The application of administrative sanctions therefore represents an important instrument for restoring legality and preventing unauthorized businesses from continuing to operate.[8]

Previous studies have examined several aspects of this issue. Dewi, Suardana, and Antara examined the legal protection of tourists security and safety by travel bureaus under Law No. 10 of 2009 on Tourism and found that travel bureaus are required to provide protection, security, and safety to tourists and comply with applicable business standards. Their research also examined administrative sanctions for travel bureaus that fail to meet safety and security standards, including written warnings, restrictions on business

[7] Mo Maharaj, Suyas Pawar, and Monika Rani, *A Study on Impact of Travel Agency Services on Customer Satisfaction*, 2025, https://doi.org/10.22161/ijebm.9.2.

[8] Handry Franklin, Wiwik Sri Widiarti, and Paltiada Saragi, "A LEGAL FRAMEWORK FOR THE PROTECTION OF CONSUMER RIGHTS IN E-COMMERCE TRANSACTIONS," in *Jurnal Ilmu Soial*, vol. 23, no. 2 (2025), http://jurnaldialektika.com/.

activities, and the suspension or revocation of tourism business registration.[9] Subsequent research by Suryadewa, Widiati, and Arthanaya examined the legal protection of tourists by travel bureaus in Badung Regency.[10] The study emphasized that tourism businesses have obligations to provide comfort, security, safety, and appropriate services to tourists, while also identifying the importance of business standards and certification in supporting tourist protection. Although these studies provide important foundations, an analytical gap remains. Existing research has generally discussed either the supervision of unlicensed online travel bureaus, the general legal protection of tourists, the responsibility of licensed travel bureaus, or the relationship between illegal travel activities and sustainable tourism. Less attention has been directed toward an integrated examination of administrative enforcement and criminal enforcement as complementary instruments of tourist protection, particularly in the context of unlicensed travel bureaus that use digital platforms to market and transact tourism services. The regulatory transformation toward risk-based business licensing and the entry into force of the new Criminal Code in 2026 also create a contemporary legal context that requires further examination.

The present study therefore seeks to bridge the gap by examining legal protection for tourists through the combined perspective of administrative and criminal law enforcement. The study does not regard the absence of a business license merely as an administrative violation, but examines how administrative supervision may function as an initial protective mechanism and how criminal enforcement may operate when unauthorized tourism activities develop into fraudulent or otherwise unlawful conduct causing losses to tourists. This approach is particularly relevant to Bali because the island's tourism ecosystem depends not only on the quantity of tourist arrivals but also on the credibility, safety, legality, and accountability of tourism service providers.

The urgency of this research is further strengthened by the need to maintain public trust and the sustainability of Bali's tourism industry. Sustainable tourism cannot be understood solely in terms of environmental preservation or economic growth; it also requires governance based on legal certainty, accountability, consumer protection, and institutional responsibility.[11] The presence of unlicensed tourism businesses may create unfair competition against legally compliant travel bureaus, weaken government control over tourism services, and expose tourists to financial and non-financial risks. Effective law enforcement is therefore necessary not only to protect individual tourists but also to maintain a healthy tourism business environment.

Based on the foregoing background, this study focuses on two interrelated legal issues concerning the supervision and law enforcement of unlicensed Travel Bureaus operating

[9] Ni Wayan Lisna Dewi, I Wayan Suardana, and I Wayan Antara, "PERINDUNGAN HUKUM ATAS KEAMANAN DAN KESELAMATAN WISATAWAN OLEH BIRO PERJALANAN MENURUT UNDANG-UNDANG NO 10 TAHUN 2009 TENTANG KEPARIWISATAAN," *Journal Ilmiah Untab* 18, no. 02 (2021): 249–54, https://doi.org/https://ejournal.universitastabanan.ac.id/index.php/majalah-ilmiah-untab/article/view/137.

[10] Gusti Ngurah et al., "Perlindungan Hukum Terhadap Wisatawan Oleh Biro Perjalanan Wisata Di Kabupaten Badung," *Jurnal Analogi Hukum* 1, no. 3 (2019): 336–40, https://doi.org/10.22225/ah.1.3.1782.336-340.

[11] Liasari Armaijn et al., "Sustainable Tourism as the Main Pillar of Achieving Sustainable Development Goals in Kupang Regency, East Nusa Tenggara" 2 (2024): 306–12, https://share.google/fsbfnjoAOQxcYZe5D.

in Bali Province. There are several issues that need to be discussed further, among others: The first issue concerns the implementation of governmental supervision and law enforcement against Travel Bureaus that conduct tourism business activities without fulfilling the applicable licensing requirements. This issue is examined to determine the extent to which the existing legal framework and institutional mechanisms are implemented in practice, particularly in relation to the enforcement of Bali Provincial Regulation Number 1 of 2010 concerning Tourism Travel Services and other relevant tourism regulations. The second issue concerns the legal remedies available to tourists, particularly foreign tourists, who experience losses as a consequence of fraud or breach of contract committed by unlicensed Travel Bureaus operating through online platforms. This issue is important because the digitalization of tourism services has created new forms of transactions in which tourists may have difficulty verifying the legality and accountability of service providers. The objective of this study is to analyze the implementation of administrative and criminal law enforcement against unlicensed travel bureaus in Bali Province and to examine the available legal protection mechanisms for tourists who suffer losses from their activities. The study specifically aims to identify the effectiveness and limitations of governmental supervision, examine the application of administrative sanctions, assess the relevance of criminal law provisions to fraudulent online tourism transactions, and analyze available legal remedies for tourists.

The novelty of this research lies in its integrated legal protection model that places administrative supervision and criminal enforcement within a single framework for protecting tourists from unlicensed travel bureaus in Bali. Rather than examining licensing violations, consumer losses, or criminal fraud separately, this study connects the preventive and repressive dimensions of legal protection and examines their interaction in the contemporary digital tourism environment. The study consequently contributes to the development of tourism law by demonstrating that effective tourist protection requires not only the existence of licensing and business standards, but also continuous administrative supervision, accessible verification mechanisms, responsive dispute resolution, and proportionate criminal enforcement where unlawful conduct satisfies the elements of a criminal offense. Through this approach, the study seeks to strengthen legal certainty, tourist protection, fair competition, and the sustainability of Bali's tourism industry.

Accordingly, this study aims to analyze the implementation of supervision and law enforcement against unlicensed Travel Bureaus in Bali Province and to examine the legal remedies available to tourists who become victims of fraud or breach of contract arising from transactions with such businesses. More broadly, the study seeks to understand the implementation of legal protection as a form of State responsibility toward tourists. Legal protection in this context is examined not only from the perspective of administrative control over tourism businesses, but also from the perspective of repressive legal measures where unlawful conduct causes loss to tourists. By examining both preventive and repressive mechanisms, this research is expected to provide a more comprehensive understanding of the effectiveness of the existing legal protection framework and the extent to which it is capable of responding to the development of online travel bureau activities in Bali.

2. Research Methods

The research method used in this paper is Empirical Legal Research, which is another approach model in researching law as an object of research, in this case, law is not only seen as a discipline. prescriptive and applied, but also empirical or legal reality.[12] Empirical legal research is particularly relevant to this study because the research examines how the legal provisions governing tourism businesses and tourist protection are implemented by the relevant authorities in dealing with unlicensed Travel Bureaus in Bali Province. Empirical Legal Research is research on legal identification and research on legal effectiveness.[13] The empirical approach enables the study to identify the relationship between the applicable legal norms and their implementation in the field, including the effectiveness of governmental supervision and law enforcement mechanisms.

The research employs two principal approaches, namely the statutory approach and the factual approach. The statutory approach is used to examine the relevant laws and regulations governing tourism businesses, business licensing, electronic transactions, consumer protection, and legal remedies for tourists. The factual approach is used to examine the actual implementation of supervision and law enforcement against unlicensed Travel Bureaus in Bali Province, including the institutional practices and challenges encountered by the relevant authorities. Through the combination of these approaches, the study seeks to identify whether the existing legal framework is effectively implemented and whether it provides adequate protection for tourists who conduct transactions with unlicensed travel service providers.

The primary legal materials used in this study consist of relevant laws and regulations, particularly Law of the Republic of Indonesia Number 10 of 2009 concerning Tourism, Bali Provincial Regulation Number 1 of 2010 concerning Tourism Travel Services, regulations concerning risk-based business licensing in the tourism sector, legislation concerning electronic information and transactions, and legislation concerning consumer protection and criminal law. These legal materials are examined to establish the normative framework governing the licensing, supervision, responsibilities, and sanctions applicable to Travel Bureaus operating in Bali Province.

In addition to legal materials, primary empirical data are obtained through interviews with relevant officials of the Bali Provincial Tourism Office and other parties considered to have knowledge and institutional competence regarding the supervision and enforcement of tourism regulations. The interviews are intended to obtain factual information concerning the implementation of supervision, identification of unlicensed Travel Bureaus, administrative measures, institutional constraints, and the legal mechanisms available when violations result in losses to tourists. Secondary legal

[12] Zaki Alif Ramadhani, Seprina Yana Alidha, and Alhilal Furqan, "Kajian Literatur Tuntutan Hak Tenaga Kerja Pariwisata Di Indonesia," *Jurnal Abdimas Pariwisata* 4, no. 2 (July 15, 2023): 169–78, https://doi.org/10.36276/jap.v4i2.426.

[13] Achmad Irwan Hamzani et al., "Implementation Approach in Legal Research," *International Journal of Advances in Applied Sciences* 13, no. 2 (June 1, 2024): 380–88, https://doi.org/10.11591/ijaas.v13.i2.pp380-388.

materials, including relevant academic literature, journal articles, and previous research, are used to complement and contextualize the primary data.[14]

The data and legal materials collected in this research are analyzed qualitatively. The analysis is conducted by systematically examining the applicable legal provisions and comparing them with empirical findings obtained from the field. The results are then organized and presented descriptively to explain the implementation of supervision and law enforcement against unlicensed Travel Bureaus and the legal remedies available to tourists who experience fraud or breach of contract. This analytical process enables the study to identify legal gaps, institutional challenges, and the effectiveness of existing legal protection mechanisms. Ultimately, the research seeks to demonstrate how administrative supervision and law enforcement can be strengthened as complementary instruments for protecting tourists, ensuring legal certainty, and supporting sustainable tourism development in Bali Province.

3. Result and Discussion

3.1 Implementation of Supervision and Law Enforcement against Travel Bureaus that Operate without a Business Permit (Illegal) in Bali Province

The development of tourism activities in Bali has resulted in the emergence of various tourism businesses that provide travel-related services to domestic and foreign tourists. One of the business activities that has an important position in the tourism industry is the Travel Bureau (Biro Perjalanan Wisata/BPW), which functions as an intermediary between tourists and various tourism service providers.[15] The services provided by Travel Bureaus may include tour packages, transportation arrangements, accommodation reservations, tour guides, destination arrangements, and other tourism-related services. The development of digital technology has subsequently changed the manner in which these services are marketed and offered. Travel Bureaus are no longer dependent on conventional offices because tourism packages can be promoted and transactions can be conducted through websites, social media, messaging applications, and other electronic platforms.

The empirical findings indicate that this development creates a significant supervisory challenge for the government, particularly when Travel Bureaus conduct business activities without fulfilling the applicable licensing requirements. Unlike conventional businesses that have a physical office and can be identified relatively easily by supervisory authorities, online Travel Bureaus may operate through digital accounts without providing sufficient information concerning their business legality, office address, licensing status, or responsible management. Consequently, the legal problem is not merely the absence of a business permit, but also the difficulty of ensuring that every

[14] Desmon Simanjuntak, Eddi Asnawi, and Bahrun Azmi, "Implementation of Revocation of Travel Business Permits Due to Not Periodic Testing in Pekanbaru City Based on Law Number 22 Year 2009 Concerning Traffic and Transportation Road Transport," *DE LEGA LATA: Jurnal Ilmu Hukum* 7, no. 2 (December 3, 2022), https://doi.org/10.30596/dll.v7i2.10199.

[15] Florensia Herienda et al., "The Preferences of Tourists in Choosing Transportation Modes for Traveling in Bandung City," *TRJ Tourism Research Journal* 9, no. 1 (April 15, 2025): 64, https://doi.org/10.30647/trj.v9i1.277.

business activity promoted through digital media can be effectively identified, verified, and supervised by the competent authorities.

From the perspective of statutory law, the obligation to conduct tourism business activities in accordance with legal requirements is rooted in the national tourism regulatory framework. Law Number 10 of 2009 concerning Tourism establishes the obligation of tourism entrepreneurs to comply with applicable business requirements and to provide services that ensure comfort, security, and safety for tourists. Article 26 requires tourism entrepreneurs, among other obligations, to provide accurate and responsible information, provide services in accordance with standards, and provide security and safety for tourists. The provision demonstrates that the legality of a tourism business is directly related to the protection of tourists. Therefore, licensing should not be understood merely as an administrative formality for business actors but as an instrument of preventive legal protection.

This legal construction is strengthened by the current risk-based business licensing system. The former Government Regulation Number 5 of 2021 concerning Risk-Based Business Licensing has been revoked and replaced by Government Regulation Number 28 of 2025 concerning Risk-Based Business Licensing. The new regulation emphasizes that business licensing constitutes the legality granted to business actors to commence and conduct business activities and that business actors are required to possess the appropriate Business License (Perizinan Berusaha/PB). The regulatory framework also retains the principle that licensing and supervision are connected to the level of risk associated with a particular business activity.

In the tourism sector, Regulation of the Minister of Tourism and Creative Economy Number 4 of 2021 specifically establishes business standards for Travel Bureau activities and classifies Travel Bureau activities within the risk-based licensing framework. The existence of specific business standards demonstrates that the government does not merely regulate whether a Travel Bureau possesses a license, but also regulates the standards that must be fulfilled in conducting its activities. These standards are important because tourism services directly concern consumers who may rely upon the representations and guarantees provided by tourism businesses.

Therefore, when an online Travel Bureau operates without fulfilling the required licensing requirements, the violation should be understood within a broader regulatory framework. The absence of a permit creates a condition in which the business has not demonstrated compliance with the administrative requirements and standards established by the State. Such circumstances potentially increase the vulnerability of tourists because they may enter into transactions with a service provider whose legal identity, business capacity, and accountability have not been adequately verified.

The supervisory function in Bali Province must consequently be understood as an institutional mechanism for translating statutory obligations into actual protection for tourists. The Bali Provincial Tourism Office has an important role in tourism administration and supervision, while coordination with other institutions and stakeholders is required when violations occur within their respective areas of authority. In practice, cooperation with tourism industry associations such as the Association of the Indonesian Tours and Travel Agencies (ASITA), as well as enforcement institutions such

as the Civil Service Police Unit (Satuan Polisi Pamong Praja/Satpol PP), can strengthen the identification and handling of unauthorized tourism businesses.[16]

The role of ASITA, however, needs to be distinguished from the role of the government. ASITA is an industry association and does not replace the statutory authority of government institutions to issue, supervise, or revoke business licensing. Its role is primarily organizational and professional, including protecting the interests of its members and encouraging compliance with professional and business standards. Consequently, where an ASITA member is involved in a dispute with a tourist, organizational measures may potentially be taken in accordance with the association's internal rules. However, such measures do not constitute a substitute for administrative sanctions imposed by the competent government authority or criminal prosecution by law enforcement authorities.

The empirical relationship between these institutions illustrates that supervision of unlicensed Travel Bureaus requires a multi-institutional approach. The Bali Provincial Tourism Office may identify and administratively supervise tourism business activities; local governments may exercise authority within their respective administrative jurisdictions; Satpol PP may perform enforcement functions within the scope of its statutory authority, while police and prosecutorial institutions become relevant when the conduct fulfills the elements of a criminal offense. This institutional division is important because the legal consequences of operating without a permit are not necessarily identical to the consequences of fraudulent conduct against tourists.

From the perspective of the theory of legal protection, the supervision of Travel Bureaus represents a form of preventive legal protection. Preventive protection is intended to prevent violations before they result in losses. Licensing, business registration, certification, verification of business standards, monitoring of tourism advertisements, and public access to information concerning the legality of tourism businesses are therefore essential preventive mechanisms. The preventive function becomes increasingly important in the digital environment because tourists frequently make decisions and payments before physically arriving in Bali.

The importance of preventive supervision is also reflected in the obligations imposed on tourism entrepreneurs under Law Number 10 of 2009. Article 26 requires tourism entrepreneurs to provide accurate and responsible information and to ensure security and safety in the provision of tourism services. Thus, when a Travel Bureau advertises a tourism package online, the information provided through the digital platform should not be viewed solely as commercial content. It may constitute information relied upon by tourists in deciding whether to enter into a transaction. If the information is false, misleading, or deliberately conceals the absence of a business license, the conduct may have consequences beyond an administrative violation.

The existence of an administrative licensing requirement also serves to create a level playing field between compliant and non-compliant business actors. Licensed Travel Bureaus are required to bear the costs of compliance, including fulfilling business

[16] Wawas Bangun Tegar Sunaryo Putra, "Problems, Common Beliefs and Procedures on the Use of Partial Least Squares Structural Equation Modeling in Business Research," *South Asian Journal of Social Studies and Economics*, May 2, 2022, 1–20, https://doi.org/10.9734/sajsse/2022/v14i130367.

standards, maintaining organizational accountability, and complying with government supervision. Conversely, unlicensed operators may obtain an unfair competitive advantage if they are allowed to operate without fulfilling comparable obligations. Effective supervision is therefore necessary not only to protect tourists but also to protect legitimate tourism businesses from unfair competition.

The repressive dimension of legal protection becomes relevant when preventive supervision fails and an unlicensed Travel Bureau continues its activities or causes losses to tourists. Law Number 10 of 2009 provides administrative sanctions for tourism entrepreneurs who fail to comply with specified obligations. Article 63 provides a graduated administrative sanction mechanism consisting of written warnings, restrictions on business activities, and temporary suspension of business activities. This graduated mechanism demonstrates that administrative enforcement is intended to provide an opportunity for compliance while simultaneously giving the government stronger intervention when the business actor fails to correct the violation.

At the regional level, Bali Provincial Regulation Number 1 of 2010 concerning Tourism Travel Services also constitutes an important legal basis for regulating Travel Bureau activities in Bali. The regional regulation was specifically established to regulate tourism travel service businesses and remains an important reference in the regional governance of Travel Bureau activities. However, the application of a 2010 regional regulation must be interpreted harmoniously with the subsequent national licensing framework. This is particularly important because the Indonesian business licensing system has undergone substantial transformation toward risk-based licensing and the use of the Online Single Submission (OSS) system.

Accordingly, the supervision of online Travel Bureaus should no longer be conducted solely through conventional inspection of physical business premises. A contemporary supervisory mechanism should include verification of digital business identities, examination of online advertisements and tourism packages, verification of licensing information through relevant government systems, monitoring of consumer complaints, and coordination among tourism authorities and other relevant institutions. Such an approach is consistent with the changing character of tourism business activities and the increasing use of electronic transactions.

Meanwhile, when analyzed based on aspects of legal theory, the legal theory used in analyzing the case is the theory of legal protection. This is because the State is obliged to provide legal protection for its citizens, as in Indonesia which established itself as a legal state as stated in the provisions of Article 1 paragraph (3) of the 1945 Constitution of the Republic of Indonesia (hereinafter referred to as the 1945 Constitution of the Republic of Indonesia). Determines that "Indonesia is a state of law". Legal protection is a protection given to legal subjects (from someone's arbitrary actions) in the form of legal instruments, both preventive and repressive, both written and unwritten. Legal protection is an illustration of the function of law, namely that the law can provide justice, order, certainty, benefit and peace.[17]

[17] Handry Franklin, Wiwik Sri Widiarti, and Paltiada Saragi, "A LEGAL FRAMEWORK FOR THE PROTECTION OF CONSUMER RIGHTS IN E-COMMERCE TRANSACTIONS," *Jurnal Ilmu Soial*, vol. 23, 2025, http://jurnaldialektika.com/.

The empirical findings therefore demonstrate that the principal challenge is not necessarily the absence of legal norms. Indonesia already possesses a relatively comprehensive regulatory framework concerning tourism businesses, business licensing, consumer protection, electronic transactions, and criminal law.[18] The more significant challenge concerns the implementation of those norms, particularly the ability of authorities to identify online operators, coordinate institutional supervision, respond to complaints, and impose sanctions proportionately and consistently.

In this context, the principle of legal protection requires that enforcement achieve three objectives: justice, legal certainty, and benefit. Justice requires that legitimate Travel Bureaus not be disadvantaged by unlicensed competitors. Legal certainty requires clear criteria concerning licensing obligations, supervisory authority, violations, and sanctions. Benefit requires that the enforcement mechanism actually reduce the risk of tourist losses and increase confidence in Bali as a tourism destination. Therefore, administrative supervision should not merely function as a bureaucratic mechanism but should be directed toward the substantive protection of tourists and the creation of a healthy tourism business environment.

The findings further indicate that administrative enforcement and criminal enforcement should not be treated as competing mechanisms. They operate at different stages and address different forms of unlawful conduct. Administrative enforcement primarily addresses the legality and compliance of business activities, [19] whereas criminal enforcement becomes relevant where the conduct satisfies the elements of a criminal offense. This distinction is essential to prevent the over-criminalization of ordinary licensing violations while ensuring that fraudulent conduct is not treated merely as an administrative matter.

Accordingly, the implementation of supervision against unlicensed Travel Bureaus in Bali can be conceptually structured into three stages: identification and verification, administrative enforcement, and escalation to criminal enforcement where legally justified. The first stage aims to establish whether a business is operating without the required authorization. The second stage involves administrative measures to restore compliance or terminate unauthorized activities. The third stage applies where there is sufficient evidence that the business actor has committed an independent criminal offense, such as fraud or electronic transaction related offenses. This structure reflects a preventive-repressive model of legal protection and provides a more systematic approach to safeguarding tourists.

[18] I Wayan Agus Rama, I Wayan Wesna Astara, and I Made Sepud, "THE AUTHORITY OF THE BALI PROVINCIAL GOVERNMENT IN LAW ENFORCEMENT AGAINST FOREIGN TOURIST GUIDES WITHOUT LICENSES," *Journal of Court and Justice*, October 4, 2024, 1–13, https://doi.org/10.56943/jcj/v3i4.629.

[19] Dewi Asimah and Anna Erliyana, "The Concept and Legal Protection Regarding Government Administrative Actions in the Form of Not Performing Concrete Actions (Omission)," *Jurnal IUS Kajian Hukum Dan Keadilan* 13, no. 3 (December 24, 2025): 708–33, https://doi.org/10.29303/ius.v13i3.1520.

3.2 Legal Remedies against Fraud and Breach of Contract Committed by Unlicensed Online Travel Bureaus in Bali Province

Travel Bureau services are fundamentally based on trust. Tourists entrust their money, [20] travel arrangements, personal information, and expectations concerning accommodation, transportation, and tourism activities to the service provider. The contractual relationship between a tourist and a Travel Bureau therefore creates corresponding legal obligations. When a Travel Bureau fails to provide the promised service, refuses to refund payments, provides materially different services from those agreed upon, or deliberately provides false information to induce payment, the legal consequences must be examined according to the specific nature of the conduct.

The first legal distinction that must be made is between breach of contract and fraud. A failure to perform a contractual obligation does not automatically constitute a criminal offense. Breach of contract generally arises from the failure of one party to fulfill an obligation agreed upon in a valid contractual relationship. Fraud, by contrast, requires the fulfillment of specific criminal elements, including an unlawful intention to obtain a benefit through a false identity, false position, deceit, or a series of false statements that causes another person to surrender property or undertake an obligation.

This distinction is particularly important in online tourism transactions. For example, where an online Travel Bureau legitimately offers a tour package but subsequently fails to perform because of a genuine operational problem, the dispute may initially constitute a contractual matter. However, where the operator never intended to provide the advertised service, deliberately uses a false business identity, falsely represents itself as a licensed Travel Bureau, or systematically obtains payments through fabricated tourism packages, the conduct may move beyond breach of contract and potentially satisfy the elements of fraud.

Under the current criminal law framework, fraud is regulated by Article 492 of Law Number 1 of 2023 concerning the Criminal Code. The provision criminalizes conduct intended to unlawfully benefit oneself or another person through a false name or position, deceit, or a series of false statements that induces another person to surrender property, create a debt acknowledgment, or extinguish a debt. The maximum penalty is imprisonment for four years or a category V fine. Because the new Criminal Code is now the applicable criminal framework, future enforcement against fraudulent Travel Bureau activities should be analyzed under the current provision rather than relying exclusively on the former Article 378 of the previous Criminal Code.

The digital character of the transaction may also trigger the application of the electronic information and transaction framework.[21] Article 28(1) of Law Number 1 of 2024, as the Second Amendment to Law Number 11 of 2008 concerning Electronic Information and Transactions, regulates the intentional distribution and/or transmission of electronic information or electronic documents containing false or misleading information that

[20] Ms. S. Boomika and Dr. C. Meera, "A Study on Impact of Marketing Mix on Customer Satisfaction," *International Journal of Research Publication and Reviews* 6, no. 4 (2025): 12017–111, https://doi.org/10.55248/gengpi.6.0425.15156.

[21] Dewi Nadya Maharani et al., "Legal Protection of Vulnerable Consumers in Digital Transactions in Indonesia," *Rechtsidee, Journal Universitas Muhammadiah Sidoarjo* 14, no. 1 (2026), https://doi.org/10.21070/jihr.v14i1.1143.

causes material loss to consumers in electronic transactions.[22] This provision is particularly relevant when the fraudulent representation is made through websites, social media, messaging applications, or other electronic media and the resulting transaction causes material loss to tourists.

Nevertheless, the application of Article 28(1) should not be automatic merely because a Travel Bureau operates online. The investigating authority must establish the elements required by the provision, including the existence of electronic information or documents, the nature of the information as false or misleading, the intentional character of the conduct, the consumer status of the victim, the existence of an electronic transaction, and the resulting material loss. This element-based analysis is necessary to maintain the principle of legality and prevent the criminalization of disputes that are essentially contractual in nature.

In addition to criminal remedies, tourists may pursue civil legal remedies when the Travel Bureau fails to perform its contractual obligations. The contractual relationship creates reciprocal rights and obligations between the parties. Where a Travel Bureau accepts payment for a tourism package, the payment creates an obligation to provide the agreed service according to the terms of the agreement. Failure to perform, delayed performance, improper performance, or refusal to perform may constitute a breach of contract, subject to the facts and terms of the particular transaction.

The legal responsibility of the Travel Bureau can therefore be analyzed through the theory of legal responsibility. In the context of contractual liability, responsibility arises because the business actor has undertaken an obligation toward the tourist. The existence of an agreement creates a legal relationship, while the failure to fulfill the agreed obligation may provide a basis for demanding performance, compensation, termination of the agreement, or other remedies available under civil law. The absence of a business permit does not eliminate the factual consequences of a transaction that has already occurred between the Travel Bureau and the tourist. Rather, the absence of licensing may constitute an additional administrative violation and may become relevant in assessing the legality and accountability of the business activity.

The consumer protection dimension is equally important. Tourists who purchase Travel Bureau services can occupy the position of consumers, while the Travel Bureau functions as a business actor providing services. The Consumer Protection Law establishes principles and rights intended to protect consumers from losses resulting from the provision of goods and/or services. Therefore, legal protection for tourists should not be confined to tourism legislation. A comprehensive analysis requires the integration of tourism law, consumer protection law, contract law, electronic transaction law, administrative law, and criminal law.

Alternative dispute resolution constitutes another legal avenue available to tourists. Law Number 30 of 1999 concerning Arbitration and Alternative Dispute Resolution recognizes several mechanisms for resolving disputes outside ordinary court proceedings, including

[22] Ade Sultan Muhammad and Febrihadi Suparidho, "Legal Basis for the Use of Electronic Media as a Means of Transaction in Indonesia," *Business Management* 4, no. 4 (2025): 793–99, https://doi.org/10.58258/bisnis.v4i4.9722.

consultation, negotiation, mediation, conciliation, expert assessment, and arbitration.[23] These mechanisms may be particularly useful for tourism disputes because tourists, especially foreign tourists, may require a faster, less formal, and more accessible method of dispute resolution.

However, alternative dispute resolution should not be interpreted as preventing criminal law enforcement where the conduct contains sufficient indications of a criminal offense. Mediation may be appropriate for contractual disputes involving performance, refund, or compensation, but the existence of a private settlement does not necessarily erase the public-law dimension of conduct that independently fulfills the elements of a criminal offense. Consequently, the appropriate legal remedy must be determined according to the nature of the violation.

From the perspective of legal protection theory, the available remedies can be divided into preventive and repressive measures. Preventive protection should enable tourists to verify the legality of a Travel Bureau before making a transaction. This may include verification of business licensing, publication of official business information, use of identifiable business accounts, disclosure of business addresses and contact details, transparent terms and conditions, and clear refund policies. Government agencies and tourism stakeholders should facilitate access to information so that tourists can make informed decisions before entering into transactions.

Repressive protection, on the other hand, is required after a violation has occurred. It may take the form of administrative sanctions, civil claims, consumer dispute resolution, and criminal prosecution.[24] The appropriate mechanism depends on the nature of the conduct and the evidence available. This distinction is particularly important because not every tourist complaint should be processed through criminal law. A proportionate legal response requires authorities to determine whether the conduct represents a licensing violation, breach of contract, consumer protection violation, fraud, or a combination of these violations.

Accordingly, administrative and criminal law enforcement should be understood as complementary mechanisms within an integrated law enforcement framework. Where a Travel Bureau is found to be operating without the requisite business authorization, the competent administrative authorities are required to verify its legal status and undertake appropriate administrative measures in accordance with the applicable laws and regulations. If the business continues to operate unlawfully or fails to comply with the applicable requirements, stronger administrative measures may follow. Where the conduct additionally involves intentional deception and causes material loss to tourists, criminal law enforcement may be initiated if the elements of the relevant offense are satisfied.

---

[23] Habib Adjie, "Under a Creative Commons Attribution-NonCommercial-ShareAlike 4.0 International (CC BY-NC-SA 4.0) Contradiction: Inclusion of Multiple Dispute Settlement Clauses in the Agreement," *International Journal of Criminal Justice Sciences* 18 (2023), https://doi.org/10.5281/zenodo.4756226/IJCJS.

[24] Helsi Febri Lestari, "Implementation of Criminal Sanctions for the Criminal Action of Fraud Against Consumers Related To the Sale System Based on Law No . 8 of 1999 Concerning Consumer Protection," *Journal Independent, Fakultas Hukum Universitas Islam Lamongan*, no. 8 (1999): 278–97, https://share.google/iGfxsvIsBNIYjHTFX.

This model is important because the purpose of administrative law enforcement is not merely punitive. Administrative sanctions are also instruments for restoring legality and preventing continuing harm. Article 63 of Law Number 10 of 2009 illustrates this graduated approach through written warnings, restrictions on business activities, and temporary suspension of business activities. At the regional level, the Bali regulatory framework provides additional mechanisms concerning tourism travel service businesses, including action against businesses operating without the required authorization. The regional framework must, however, be implemented consistently with the current national business licensing system.

The enforcement framework must also account for the special position of foreign tourists. Foreign tourists may face additional difficulties because they are unfamiliar with Indonesian legal procedures, language barriers may exist, and their period of stay in Indonesia is generally limited. Consequently, the availability of accessible complaint mechanisms, multilingual information, digital reporting channels, and coordinated institutional responses is essential. Legal protection should not only exist in statutory texts but must also be practically accessible to the persons whom the law is intended to protect.

The findings therefore indicate that the protection of tourists from unlicensed online Travel Bureaus requires an integrated institutional and legal response. The Bali Provincial Tourism Office has an important preventive and supervisory role; local enforcement authorities may support administrative enforcement; industry associations may contribute to professional standards and information; consumer protection institutions may facilitate dispute resolution; while police, prosecutors, and courts perform their respective roles where criminal conduct is alleged and proven. The effectiveness of the system depends on coordination among these institutions rather than on the operation of each institution in isolation.

The analysis also demonstrates that administrative closure alone is insufficient where the underlying conduct involves deliberate fraud. Administrative closure can stop or restrict the operation of an unauthorized business, but it does not necessarily restore the tourist's financial loss or establish criminal accountability for deceptive conduct. Conversely, criminal prosecution alone cannot replace the need for continuous administrative supervision because criminal law generally operates after a violation has occurred. The two mechanisms must therefore function as complementary instruments.

Figure 1. Administrative and Criminal Law Enforcement Framework for Protecting Tourists from Unlicensed Online Travel Bureaus in Bali Province



Source: Ministry of Tourism Republic of Indonesia, 2025.[25]

The Figure 1. This framework demonstrates that legal protection should be understood as a continuous process rather than a single enforcement action. Preventive protection reduces the possibility of tourist losses before transactions occur, administrative enforcement restores business legality and market order, civil and consumer remedies provide avenues for compensation, and criminal enforcement establishes accountability where intentional unlawful conduct satisfies the elements of a criminal offense.

Ultimately, the results demonstrate that the legal problem of unlicensed online Travel Bureaus in Bali is not solely a problem of licensing compliance. It is simultaneously an issue of tourist protection, consumer protection, fair competition, digital transaction governance, administrative supervision, and criminal accountability. The existence of legal norms at the national and regional levels provides a foundation for enforcement, but the effectiveness of those norms depends on institutional capacity, inter-agency coordination, accessibility of information, and the consistency of sanctions. Therefore, strengthening the supervisory system should become a priority in Bali's tourism governance, particularly through digital monitoring and verification mechanisms that correspond to the changing characteristics of tourism businesses.

In this regard, sustainable tourism requires not only an increase in tourist arrivals and economic benefits but also a trustworthy and legally accountable tourism business environment. Protecting tourists from unlicensed Travel Bureaus contributes directly to the credibility of Bali as an international destination. At the same time, strict enforcement

[25] Ministry of Tourism Republic of Indonesia, 2025. Press Release: No Ban on Online Travel Agencies (OTA) as Government Strengthens Oversight of Unlicensed Tourism Accommodations. URL: https://kemenpar.go.id/en/articles/press-release-no-ban-on-online-travel-agencies-ota-as-government-strengthens-oversight-of-unlicensed-tourism-accommodations

creates fairer conditions for licensed Travel Bureaus that comply with government requirements. The integration of preventive supervision, administrative enforcement, civil and consumer remedies, and proportionate criminal enforcement therefore represents an important legal strategy for strengthening tourist protection and supporting sustainable tourism development in Bali Province.

4. Conclusion

Based on the results of the research and discussion, the conclusions of this study are as follows The implementation of supervision and law enforcement against Travel Bureaus (BPW) operating without the required business permits in Bali Province has not been optimal, particularly in monitoring and identifying online Travel Bureaus whose business activities are conducted through digital platforms. Although the existing legal framework provides a basis for tourism business licensing, supervision, and administrative enforcement, its implementation requires stronger institutional coordination, digital monitoring, and verification of business legality. Preventive legal protection is implemented through licensing, business standards, certification, supervision, and the provision of accurate information to tourists. Meanwhile, repressive legal protection is implemented through administrative measures and, where the conduct fulfills the elements of a criminal offense, through the criminal justice system involving law enforcement institutions. These mechanisms constitute the State's responsibility to ensure legal certainty, security, safety, and protection for tourists while maintaining fair competition among tourism businesses in Bali Province.

Legal remedies against fraud and breach of contract committed by unlicensed online Travel Bureaus in Bali Province are available through administrative, civil, consumer protection, and criminal law mechanisms, depending on the nature of the violation. From an administrative perspective, Travel Bureaus operating without the required authorization may be subject to administrative measures, including the closure of business premises in accordance with Article 16 paragraph (1) of Bali Provincial Regulation Number 1 of 2010 concerning Tourism Travel Services. Where online activities involve the intentional dissemination or transmission of false or misleading electronic information that causes material losses to consumers in electronic transactions, the conduct may be subject to Article 28 paragraph (1) of Law Number 1 of 2024 concerning the Second Amendment to Law Number 11 of 2008 concerning Electronic Information and Transactions. Where the conduct fulfills the elements of fraud, criminal liability may be imposed pursuant to Article 492 of Law Number 1 of 2023 concerning the Criminal Code. In cases involving breach of contract, tourists may pursue civil remedies and alternative dispute resolution mechanisms, including negotiation, mediation, conciliation, arbitration, or other mechanisms available under the applicable laws and regulations. Accordingly, the availability of these legal remedies provides a framework for protecting tourists from financial losses while ensuring accountability for unlicensed Travel Bureaus operating in Bali Province.

Based on the conclusions above, it is recommended that the relevant government authorities strengthen the supervision of online Travel Bureaus through integrated licensing verification, digital monitoring, inter-agency coordination, and accessible complaint mechanisms for tourists. In addition, law enforcement should be implemented proportionately by distinguishing administrative violations, breach of contract, and criminal conduct, so that administrative, civil, consumer protection, and criminal

remedies can operate effectively according to the nature of each violation. Strengthening these mechanisms is expected to enhance legal certainty and tourist protection while supporting a fair, accountable, and sustainable tourism industry in Bali Province.

Acknowledgments

The author would like to express sincere gratitude and highest appreciation to all individuals and institutions who contributed to the completion of this research and article through their valuable support, guidance, advice, and encouragement, both academically and personally. First and foremost, the author would like to express her deepest gratitude to Dr. I Made Sepud, S.H., M.H., for his valuable guidance, constructive advice, insightful suggestions, and continuous direction throughout the research and writing process. His academic supervision and critical input have significantly contributed to the improvement and completion of this article. The author also extends sincere appreciation to the lecturers of the Rooms Division Study Program, Bali Tourism Polytechnic, for their valuable academic contributions, discussions, support, and encouragement throughout the preparation of this research. Their knowledge and professional insights have contributed to the development of the author's understanding of tourism law and its practical implementation in the tourism industry. The author would also like to express gratitude to the Bali Provincial Tourism Office (Dinas Pariwisata Provinsi Bali) for providing valuable information and empirical data relevant to the implementation of supervision and law enforcement against unlicensed Travel Bureaus in Bali Province. The information obtained from the relevant officials has been essential in supporting the empirical analysis presented in this study. Special appreciation is also extended to the Denpasar District Court (Pengadilan Negeri Denpasar) for its assistance in facilitating access to secondary legal materials, particularly relevant court decisions and legal documents that supported the analysis of the legal issues examined in this research.

Finally, the author expresses her deepest gratitude to her parents and extended family for their continuous moral support, prayers, encouragement, patience, and understanding throughout the research and writing process. Their unwavering support has been an important source of motivation for the author in completing this research. The author sincerely appreciates all contributions, assistance, and support received throughout the preparation of this article. Any remaining shortcomings are entirely the responsibility of the author.

References

Adjie, Habib. "Under a Creative Commons Attribution-NonCommercial-ShareAlike 4.0 International (CC BY-NC-SA 4.0) Contradiction: Inclusion of Multiple Dispute Settlement Clauses in the Agreement." *International Journal of Criminal Justice Sciences* 18 (2023). https://doi.org/10.5281/zenodo.4756226/IJCJS.

Armaijn, Liasari, Dewi Darmayanti, Buyung Sonia, and Hidayat Rochmat. "Sustainable Tourism as the Main Pillar of Achieving Sustainable Development Goals in Kupang Regency, East Nusa Tenggara" 2 (2024): 306–12. https://share.google/fsbfnjoAOQxcYZe5D.

Asimah, Dewi, and Anna Erliyana. "The Concept and Legal Protection Regarding Government Administrative Actions in the Form of Not Performing Concrete Actions (Omission)." *Jurnal IUS Kajian Hukum Dan Keadilan* 13, no. 3 (December 24, 2025): 708–33. https://doi.org/10.29303/ius.v13i3.1520.

Boomika, Ms. S., and Dr. C. Meera. "A Study on Impact of Marketing Mix on Customer Satisfaction." *International Journal of Research Publication and Reviews* 6, no. 4 (2025): 12017–111. https://doi.org/10.55248/gengpi.6.0425.15156.

Dewi, Ni Wayan Lisna, I Wayan Suardana, and I Wayan Antara. "PERINDUNGAN HUKUM ATAS KEAMANAN DAN KESELAMATAN WISATAWAN OLEH BIRO PERJALANAN MENURUT UNDANG-UNDANG NO 10 TAHUN 2009 TENTANG KEPARIWISATAAN." *Journal Ilmiah Untab* 18, no. 02 (2021): 249–54. https://doi.org/https://ejournal.universitastabanan.ac.id/index.php/majalah-ilmiah-untab/article/view/137.

Franklin, Handry, Wiwik Sri Widiarti, and Paltiada Saragi. "A LEGAL FRAMEWORK FOR THE PROTECTION OF CONSUMER RIGHTS IN E-COMMERCE TRANSACTIONS." *Jurnal Ilmu Soial*. Vol. 23, 2025. http://jurnaldialektika.com/.

Hamzani, Achmad Irwan, Tiyas Vika Widyastuti, Nur Khasanah, and Mohd Hazmi Mohd Rusli. "Implementation Approach in Legal Research." *International Journal of Advances in Applied Sciences* 13, no. 2 (June 1, 2024): 380–88. https://doi.org/10.11591/ijaas.v13.i2.pp380-388.

Herienda, Florensia, Hanni Adriani, Fifi Nofiyanti, Mohammad Syaltut Abduh, and Alifatqul Maulana. "The Preferences of Tourists in Choosing Transportation Modes for Traveling in Bandung City." *TRJ Tourism Research Journal* 9, no. 1 (April 15, 2025): 64. https://doi.org/10.30647/trj.v9i1.277.

Lestari, Helsi Febri. "Implementation of Criminal Sanctions for the Criminal Action of Fraud Against Consumers Related To the Sale System Based on Law No . 8 of 1999 Concerning Consumer Protection." *Journal Independent, Fakultas Hukum Universitas Islam Lamongan*, no. 8 (1999): 278–97. https://share.google/iGfxsvIsBNIYjHTFX.

Maharani, Dewi Nadya, Muhamad Afifullah, Fauzan Muzakki, Henni Wijayanti, and Roosdiana Harahap. "Legal Protection of Vulnerable Consumers in Digital Transactions in Indonesia." *Rechtsidee, Journal Universitas Muhammadiah Sidoarjo* 14, no. 1 (2026). https://doi.org/10.21070/jihr.v14i1.1143.

Ministry of Tourism Republic of Indonesia, 2025. Press Release: No Ban on Online Travel Agencies (OTA) as Government Strengthens Oversight of Unlicensed Tourism Accommodations. URL: https://kemenpar.go.id/en/articles/press-release-no-ban-on-online-travel-agencies-ota-as-government-strengthens-oversight-of-unlicensed-tourism-accommodations

Muhammad, Ade Sultan, and Febrihadi Suparidho. "Legal Basis for the Use of Electronic Media as a Means of Transaction in Indonesia." *Business Management* 4, no. 4 (2025): 793–99. https://doi.org/10.58258/bisnis.v4i4.9722.

Ngurah, Gusti, Agung Suryadewa, Ida Ayu, Putu Widiati Dan I, and Wayan Arthanaya. "Perlindungan Hukum Terhadap Wisatawan Oleh Biro Perjalanan Wisata Di Kabupaten Badung." *Jurnal Analogi Hukum* 1, no. 3 (2019): 336–40. https://doi.org/10.22225/ah.1.3.1782.336-340.

Putra, Wawas Bangun Tegar Sunaryo. "Problems, Common Beliefs and Procedures on the Use of Partial Least Squares Structural Equation Modeling in Business Research." *South Asian Journal of Social Studies and Economics*, May 2, 2022, 1–20. https://doi.org/10.9734/sajsse/2022/v14i130367.

Rama, I Wayan Agus, I Wayan Wesna Astara, and I Made Sepud. "THE AUTHORITY OF THE BALI PROVINCIAL GOVERNMENT IN LAW ENFORCEMENT AGAINST

FOREIGN TOURIST GUIDES WITHOUT LICENSES." *Journal of Court and Justice*, October 4, 2024, 1–13. https://doi.org/10.56943/jcj/v3i4.629.

Simanjuntak, Desmon, Eddi Asnawi, and Bahrun Azmi. "Implementation of Revocation of Travel Business Permits Due to Not Periodic Testing in Pekanbaru City Based on Law Number 22 Year 2009 Concerning Traffic and Transportation Road Transport." *DE LEGA LATA: Jurnal Ilmu Hukum* 7, no. 2 (December 3, 2022). https://doi.org/10.30596/dll.v7i2.10199.

Suparta, I Nyoman, Nyoman Djinar Setiawina, Made Heny Urmila Dewi, and I Ketut Yadnyana. "Influence of the Tourism Sector and Financial Performance on Development Performance in Regencies/Cities in Bali Province." *International Journal of Health Sciences* 6, no. May (2022): 4318–27. https://doi.org/10.53730/ijhs.v6ns4.10750.

Zaki Alif Ramadhani, Seprina Yana Alidha, and Alhilal Furqan. "Kajian Literatur Tuntutan Hak Tenaga Kerja Pariwisata Di Indonesia." *Jurnal Abdimas Pariwisata* 4, no. 2 (July 15, 2023): 169–78. https://doi.org/10.36276/jap.v4i2.426.

Laws and Regulations

The Law of Constitution of the Republic of Indonesia Year 1945, State Gazette of the Republic of Indonesia Year 2006 Number 11, Supplement to State Gazette of the Republic of Indonesia Number 12, Supplement to State Gazette of the Republic of Indonesia Number 13, Supplement to State Gazette of the Republic of Indonesia Number 14.

The Law of the Republic of Indonesia Number 10 of 2009 concerning Tourism, State Gazette of the Republic of Indonesia of 2009 Number 11, Supplement to the State Gazette of the Republic of Indonesia Number 4966.

The Law of the Republic of Indonesia Number 30 of 1999 concerning Arbitration and Alternative Dispute Resolution, Gazette The Republic of Indonesia of 1999 Number 138, Supplement to the State Gazette of the Republic of Indonesia Number 3872.

The Law of the Republic of Indonesia Number 11 of 2008 concerning Information and Electronic Transactions, State Gazette of the Republic of Indonesia of 2008 Number 58, Supplement to the State Gazette of the Republic of Indonesia Number 4843.