UNIVERSITAS
GADJAH MADA
**Indonesia Deepfake Non-Consensual Intimate Imagery Laws: Lessons in Improving Legal Protection in
Six States**
Maulana Hafiz Ardiansyah, Sri Wiyanti Eddyono, S.H., LL.M., Ph.D.
Universitas Gadjah Mada, 2025 | Diunduh dari http://etd.repository.ugm.ac.id/

BIBLIOGRAPHY

Books:

Hadjon, P. M. (1987). Perlindungan hukum bagi masyarakat Indonesia. *Surabaya: PT Bina Ilmu*.

Soekanto, S. (2007). Penelitian hukum normatif: Suatu tinjauan singkat. Jakarta: Raja Grafindo Persada.

Journal:

Ahmed, S. R. A., & Sonuç, E. (2023). RETRACTED ARTICLE: Deepfake detection using rationale-augmented convolutional neural network. Applied Nanoscience, 13(2), 1485-1493.

Ajayi, V. O. (2017). Primary sources of data and secondary sources of data. Benue State University, 1(1), 1-6.

Alexeenko, J. A. (2021). DESIRES DRIVING DEEPFAKES: WHERE TECHNOLOGY ENCOUNTERS DEATH (Master's thesis).

Almutairi, Z., & Elgibreen, H. (2022). A review of modern audio deepfake detection methods: challenges and future directions. Algorithms, 15(5), 155.

Anand, A., Madaan, A., & Danielsson, A. (Eds.). (2024). Intersections Between Rights and Technology. IGI Global.

Andiyansari, P., & Juwono, A. P. (2024). Kecakapan Literasi Digital Para Penyintas Kekerasan Berbasis Gender di Media Daring. Jurnal Komunikasi, 18(2), 229-

UNIVERSITAS
GADJAH MADA
**Indonesia Deepfake Non-Consensual Intimate Imagery Laws: Lessons in Improving Legal Protection in
Six States**
Maulana Hafiz Ardiansyah, Sri Wiyanti Eddyono, S.H., LL.M., Ph.D.
Universitas Gadjah Mada, 2025 | Diunduh dari http://etd.repository.ugm.ac.id/

248.

Ariyanti, V. (2019). Konsep Perlindungan Korban dalam Sistem Peradilan Pidana Nasional dan Sistem Hukum Pidana Islam. Al-Manahij: Jurnal Kajian Hukum Islam, 13(1), 33-48.

Armesto-Larson, B. (2020). Nonconsensual pornography: Criminal law solutions to a worldwide problem. Or. Rev. Int'l L., 21, 177.

Armia, M. S. (2023). Constitutional courts and law reform: a case study of Indonesia (Doctoral dissertation, Anglia Ruskin Research Online (ARRO)).

Barker, M. (2013). Consent is a grey area? A comparison of understandings of consent in Fifty Shades of Grey and on the BDSM blogosphere. Sexualities, 16(8), 896-914.

Beres, M. A. (2007). 'Spontaneous' sexual consent: An analysis of sexual consent literature. Feminism & Psychology, 17(1), 93-108.

Bibri, S. E. (2015). The humanface of ambient intelligence. Atlantis Ambient and Pervasive Intelligence.

Birrer, A., & Just, N. (2024). What we know and don't know about deepfakes: An investigation into the state of the research and regulatory landscape. new media & society, 14614448241253138.

Blaikie, N., & Priest, J. (2019). Designing social research: The logic of anticipation. John Wiley & Sons

Bodi, M. (2021). The first amendment implications of regulating political deepfakes.

UNIVERSITAS
GADJAH MADA
**Indonesia Deepfake Non-Consensual Intimate Imagery Laws: Lessons in Improving Legal Protection in
Six States**
Maulana Hafiz Ardiansyah, Sri Wiyanti Eddyono, S.H., LL.M., Ph.D.
Universitas Gadjah Mada, 2025 | Diunduh dari http://etd.repository.ugm.ac.id/

Rutgers Computer & Tech. LJ, 47, 143.

Brigham, N. G., Wei, M., Kohno, T., & Redmiles, E. M. (2024). " Violation of my body:" Perceptions of AI-generated non-consensual (intimate) imagery. arXiv preprint arXiv:2406.05520.

Celli, F. (2020). Deepfakes are coming: Does Australia come prepared?. Canberra L. Rev., 17, 193.

Citron, D. K. (2018). Sexual privacy. Yale LJ, 128, 1870.

Dagar, D., & Vishwakarma, D. K. (2022). A literature review and perspectives in deepfakes: generation, detection, and applications. International journal of multimedia information retrieval, 11(3), 219-289.

Fan, Y., Xie, M., Wu, P., & Yang, G. (2022, June). Real-time deepfake system for live streaming. In Proceedings of the 2022 International Conference on Multimedia Retrieval (pp. 202-205)

Feeney, M. (2021). Deepfake laws risk creating more problems than they solve. Regulatory Transparency Project.

Fiss, O. M. (1979). Foreword: The forms of justice. Harv. L. Rev., 93, 1.

Flynn, A., Clough, J., & Cooke, T. (2021). Disrupting and preventing deepfake abuse: Exploring criminal law responses to AI-facilitated abuse. The palgrave handbook of gendered violence and technology, 583-603

Flynn, A., Powell, A., Scott, A. J., & Cama, E. (2022). Deepfakes and digitally altered imagery abuse: A cross-country exploration of an emerging form of image-

UNIVERSITAS
GADJAH MADA
Indonesia Deepfake Non-Consensual Intimate Imagery Laws: Lessons in Improving Legal Protection in Six States
Maulana Hafiz Ardiansyah, Sri Wiyanti Eddyono, S.H., LL.M., Ph.D.
Universitas Gadjah Mada, 2025 | Diunduh dari http://etd.repository.ugm.ac.id/

based sexual abuse. The British Journal of Criminology, 62(6), 1341-1358.

Franks, E., Lee, B., & Xu, H. (2024). Report: China's New AI Regulations. Global Privacy Law Review, 5(1).

Gandrova, S., & Banke, R. (2023). Penerapan Hukum Positif Indonesia Terhadap Kasus Kejahatan Dunia Maya Deepfake. Madani: Jurnal Ilmiah Multidisiplin, 1(10).

Geng, Y. (2023). Comparing" Deepfake" Regulatory Regimes in the United States, the European Union, and China. Geo. L. Tech. Rev., 7, 157.

George, A. (2024). Defamation in the Time of Deepfakes. Available at SSRN 4719803.

Gieseke, A. P. (2020). " The New Weapon of Choice": Law's Current Inability to Properly Address Deepfake Pornography. Vand. L. Rev., 73, 1479.

Greenough, C. J. (2022). Make it, Fake it and Get Away with it? The Role of Toxic Masculinity and Threat Perception within Cases, Policies, and Legislation Surrounding Deepfakes (Doctoral dissertation, ResearchSpace@ Auckland)

Güera, D., & Delp, E. J. (2018, November). Deepfake video detection using recurrent neural networks. In 2018 15th IEEE international conference on advanced video and signal based surveillance (AVSS) (pp. 1-6). IEEE.

Hailitik, A. G. E., & Afifah, W. (2023). REGULATING ARTIFICIAL INTELLIGENCE AS A PERPETRATOR OF DEEPFAKE CRIMES IN INDONESIA. In International Conference on Universal Wellbeing (ICUW)

UNIVERSITAS GADJAH MADA
Indonesia Deepfake Non-Consensual Intimate Imagery Laws: Lessons in Improving Legal Protection in Six States
Maulana Hafiz Ardiansyah, Sri Wiyanti Eddyono, S.H., LL.M., Ph.D.
Universitas Gadjah Mada, 2025 | Diunduh dari http://etd.repository.ugm.ac.id/

2023 (Vol. 1, No. 1, pp. 26-43)

Healey, Jon. (2023) “Realtime Deepfakes Are a Threat. How to Protect Yourself - Los Angeles Times.” Los Angeles Times, Retrieved from, https://www.latimes.com/business/technology/story/2023-05- 11/realtime-aideepfakes-how-to-protect-yourself

Henry, N., & Powell, A. (2015). Beyond the ‘sext’: Technology-facilitated sexual violence and harassment against adult women. Australian & New Zealand Journal of Criminology, 48(1), 104-118.

Henry, N., Flynn, A., & Powell, A. (2019). Responding to revenge pornography: Prevalence, nature and impacts.

Hong, J. (2024). Understanding Criminal Law in Korea. Journal of Korean Law, 23(1), 101-135

Howitt, D. (1995). Pornography and the paedophile: Is it criminogenic?. British Journal of Medical Psychology, 68(1), 15-27.

Ibrahim, J. (2006). Teori dan metodologi penelitian hukum normatif. Malang: Bayumedia

Inglesh, A. (2019). Walking a Fine Line: Finding Harmony between California's Deep Fake Laws and the First Amendment. Comm. Law., 35, 27.

Jankowicz, N., Gomez-O’Keefe, I., Hoffman, L., & Vidal Becker, A. (2024). It’s everyone’s problem: mainstreaming responses to technology-facilitated gender-based violence.

UNIVERSITAS GADJAH MADA
Indonesia Deepfake Non-Consensual Intimate Imagery Laws: Lessons in Improving Legal Protection in Six States
Maulana Hafiz Ardiansyah, Sri Wiyanti Eddyono, S.H., LL.M., Ph.D.
Universitas Gadjah Mada, 2025 | Diunduh dari http://etd.repository.ugm.ac.id/

Kalf, S. (2020). What Does a Feminist Approach to Deepfake Pornography Look Like.

Khan, M. U., Sherin, S., Iqbal, M. Z., & Zahid, R. (2019). Landscaping systematic mapping studies in

Kira, B. (2024). When Non-Consensual Intimate Deepfakes Go Viral: The Insufficiency of the UK Online Safety Act. Available at SSRN 4798664.

Kirchengast, T. (2020). Deepfakes and image manipulation: criminalisation and control. Information & Communications Technology Law, 29(3), 308–323. doi:10.1080/13600834.2020.1794615

Kobriger, K., Zhang, J., Quijano, A., & Guo, J. (2021). Out of Our Depth with Deep Fakes: How the Law Fails Victims of Deep Fake Nonconsensual Pornography. Rich. JL & Tech., 28, 204.

Kugler, M. B., & Pace, C. (2021). Deepfake privacy: Attitudes and regulation. Nw. UL Rev., 116, 611.

Longino, H. E. (2018). Pornography, oppression, and freedom: A closer look. In Living with Contradictions (pp. 154-161). Routledge.

Mania, K. (2024). Legal protection of revenge and deepfake porn victims in the European Union: findings from a comparative legal study. Trauma, Violence, & Abuse, 25(1), 117-129.

Masood, Momina, et al. "Deepfakes generation and detection: State-of-the-art, open challenges,

UNIVERSITAS
GADJAH MADA
**Indonesia Deepfake Non-Consensual Intimate Imagery Laws: Lessons in Improving Legal Protection in
Six States**
Maulana Hafiz Ardiansyah, Sri Wiyanti Eddyono, S.H., LL.M., Ph.D.
Universitas Gadjah Mada, 2025 | Diunduh dari http://etd.repository.ugm.ac.id/

Mawaddah, F. H., & Haris, A. (2022). Implementasi layanan peradilan bagi penyandang disabilitas perspektif teori efektivitas hukum Soerjono Soekanto. Sakina: Journal of Family Studies, 6(2).

Meskys, E., Liaudanskas, A., Kalpokiene, J., & Jurcys, P. (2020). Regulating deep fakes: legal and ethical considerations. Journal of Intellectual Property Law & Practice, 15(1), 24–31. doi:10.1093/jiplp/jpz167

Mills, A. (2015). Reforms to Judicial Review in the Criminal Justice and Courts Act 2015: promoting efficiency or weakening the rule of law?. Public Law (Forthcoming).

Montasari, R. (2024). Responding to Deepfake Challenges in the United Kingdom: Legal and Technical Insights with Recommendations. In Cyberspace, Cyberterrorism and the International Security in the Fourth Industrial Revolution: Threats, Assessment and Responses (pp. 241-258). Cham: Springer International Publishing

Muhaimin, M. (2020). Metode Penelitian Hukum. Dalam S. Dr. Muhaimin, Metode Penelitian Hukum, Mataram-NTB: Mataram.

Nnamdi, N., Oniyinde, O. A., & Abegunde, B. (2023). An Appraisal of the Implications of Deep Fakes: The Need for Urgent International Legislations. American Journal of Leadership and Governance, 8(1), 43-70.

Novyanti, H., & Astuti, P. (2021). Jerat Hukum Penyalahgunaan Aplikasi Deepfake Ditinjau Dari Hukum Pidana. Novum: Jurnal Hukum, 31-40.

UNIVERSITAS
GADJAH MADA
Indonesia Deepfake Non-Consensual Intimate Imagery Laws: Lessons in Improving Legal Protection in Six States
Maulana Hafiz Ardiansyah, Sri Wiyanti Eddyono, S.H., LL.M., Ph.D.
Universitas Gadjah Mada, 2025 | Diunduh dari http://etd.repository.ugm.ac.id/

Nurdjana, I. G. M. (2009). Sistem Hukum Pidana dan Bahaya Laten Korupsi (Problematik Sistem Hukum Pidana dan Implikasinya pada Penegakan Hukum Tindak Pidana Korupsi). Total Media, Yogyakarta.

O'Brien, W., & Maras, M. H. (2024). Technology-facilitated coercive control: response, redress, risk, and reform. International Review of Law, Computers & Technology, 1-21 Publishing, 57(11).

Putra, G. P., & Multazam, M. T. (n.d.). Law Enforcement Against Deepfake Porn AI: Penegakan Hukum Terhadap Deepfake Porn AI.

Qi, A., Shao, G., & Zheng, W. (2018). Assessing China's cybersecurity law. Computer law & security review, 34(6), 1342-1354.

Quinn, J. (2017). A Peek Over the Great Firewall: A Breakdown of China's New Cybersecurity Law. SMU Sci. & Tech. L. Rev., 20, 407

Reynolds, R. M. (2020). When Seeing Is No Longer Believing: Deep Fakes, the Right of Publicity, and CDA 230 Reform. Am. U. Intell. Prop. Brief, 12, 1.

Rizkia, N. D., & Fardiansyah, H. (2023). Metode Penelitian Hukum (Normatif dan Empiris).

Romney, B. (2020). Screens, Teens, and Porn Scenes: Legislative approaches to protecting youth from exposure to pornography. Vt. L. Rev., 45, 43.

Safitri, S. S., Ardiansah, M. D., & Prasetyo, A. (2023). Quo Vadis Keadilan Restoratif pada Perkara Tindak Pidana Kekerasan Seksual Pasca Undang-Undang Nomor 12 Tahun 2022 tentang Tindak Pidana Kekerasan Seksual (Studi Terhadap

Indonesia Deepfake Non-Consensual Intimate Imagery Laws: Lessons in Improving Legal Protection in
Six States
Maulana Hafiz Ardiansyah, Sri Wiyanti Eddyono, S.H., LL.M., Ph.D.
Universitas Gadjah Mada, 2025 | Diunduh dari http://etd.repository.ugm.ac.id/

Pasal 23 UU TPKS). Jurnal Hukum dan HAM Wara Sains, 2(01), 29-44.

Schuett, J. (2019). Defining the scope of AI regulations. Retrieved from http://arxiv.org/abs/1909.01095

Semenzin, S., & Bainotti, L. (2020). The use of Telegram for non-consensual dissemination of intimate images: Gendered affordances and the construction of masculinities. Social Media+ Society, 6(4), 2056305120984453.

Setiono, R. O. L. (2004). Magister Ilmu Hukum Program Pascasarjana Universitas Sebelas Maret

Shirish, A., & Komal, S. (2023). A Socio-Legal Inquiry on Deepfakes. Cal. W. Int'l LJ, 54, 517.

Snell, L. (2017). Criminal law: Recording and sharing intimate images without consent. LSJ: Law Society of NSW Journal, (36), 80-81.

Sujamawardi, L. H. (2018). Analisis Yuridis Pasal 27 ayat (1) Undang-Undang Nomor 19 Tahun 2016 tentang Perubahan atas Undang-Undang Nomor 11 Tahun 2008 tentang Informasi dan Transaksi Elektronik. Dialogia Juridica, 9(2).

Tan, D. (2021). Metode penelitian hukum: Mengupas dan mengulas metodologi dalam menyelenggarakan penelitian hukum. Nusantara: Jurnal Ilmu Pengetahuan Sosial, 8(8), 2463-2478.

Umbach, R., Henry, N., Beard, G., & Berryessa, C. (2024). Attitudes towards and knowledge of non-consensual synthetic intimate imagery in 10 countries.

UNIVERSITAS
GADJAH MADA
**Indonesia Deepfake Non-Consensual Intimate Imagery Laws: Lessons in Improving Legal Protection in
Six States**
Maulana Hafiz Ardiansyah, Sri Wiyanti Eddyono, S.H., LL.M., Ph.D.
Universitas Gadjah Mada, 2025 | Diunduh dari http://etd.repository.ugm.ac.id/

Retrieved from http://arxiv.org/abs/2402.01721

Van Hoecke, M. (2013). Methodology of comparative legal research. Pravovedenie, 121.

Vartanian, T. P. (2010). Secondary data analysis. Oxford University Press.

Vazquez, L. (2024). Recommendations for regulation of deepfakes in the US: deepfake laws should protect everyone not only public figures.

Viola, M., & Voto, C. (2023). Designed to abuse? Deepfakes and the non-consensual diffusion of intimate images. Synthese, 201(1), 30.

Violin, G., & Nafi, Y. K. (2022). Protection of Online Gender-Based Violence Victims: A Feminist Legal Analysis. The Indonesian Journal of Socio-Legal Studies, 1.

von Denlinger, T. (2023). Protecting Personal Dignity: Advocating for a Federal Right of Publicity Against Pornographic Deepfakes. Chapman Law Review, 27(1).

Vyas, A. (2024). United States of Deepfake (forthcoming, Tennessee Law Review). Tennessee Law Review

Waldstricher, B. (2020). Deeply Fake, Deeply Disturbing, Deeply Constitutional: Why the First Amendment Likely Protects the Creation of Pornographic Deepfakes. Cardozo L. Rev., 42, 729.

Wang, R., Juefei-Xu, F., Huang, Y., Guo, Q., Xie, X., Ma, L., & Liu, Y. (2020, October). Deepsonar: Towards effective and robust detection of ai-synthesized

UNIVERSITAS
GADJAH MADA
Indonesia Deepfake Non-Consensual Intimate Imagery Laws: Lessons in Improving Legal Protection in Six States
Maulana Hafiz Ardiansyah, Sri Wiyanti Eddyono, S.H., LL.M., Ph.D.
Universitas Gadjah Mada, 2025 | Diunduh dari http://etd.repository.ugm.ac.id/

fake voices. In Proceedings of the 28th ACM international conference on multimedia (pp. 1207-1216).

Weitzman, Cliff. “Understanding Audio Deepfake: Creation, Detection, and Legal Implications.”Speechify, Retrieved from, https://shorturl.at/hnLNW

Westerlund, M. (2019). The emergence of deepfake technology: A review. Technology Innovation Management Review, 9(11), 39–52. doi:10.22215/timreview/1282

Williams, L. (1999). Hard Core: Power, Pleasure, and the" frenzy of the Visible". Univ of California Press.

Woods, L., & Antoniou, A. (2024). Pornography, the Online Safety Act 2023 and the Need for Further Reform. Available at SSRN 4928796.

Yoo, S. M., Choi, T. M., Choi, J. W., & Kim, J. H. (2023). FastSwap: A Lightweight One-Stage Framework for Real-Time Face Swapping. In Proceedings of the IEEE/CVF Winter Conference on Applications of Computer Vision (pp. 3558-3567).

Zhang, A. H. (2024). The Promise and Perils of China's Regulation of Artificial Intelligence. Available at SSRN.

Zhou, Y., & Lim, S. N. (2021). Joint audio-visual deepfake detection. In Proceedings of the IEEE/CVF International Conference on Computer Vision (pp. 14800-14809).

Zhu, S., & Ma, G. The Chinese Path to Generative AI Governance. Available at

UNIVERSITAS GADJAH MADA
Indonesia Deepfake Non-Consensual Intimate Imagery Laws: Lessons in Improving Legal Protection in Six States
Maulana Hafiz Ardiansyah, Sri Wiyanti Eddyono, S.H., LL.M., Ph.D.
Universitas Gadjah Mada, 2025 | Diunduh dari http://etd.repository.ugm.ac.id/

SSRN 4551316.

Zotti, Susanna Sharon. "Online Violence: a gender-based phenomenon." (2023).

Website Article:

Anh, N. B. T. DEEPFAKE AND ITS ETHICS CONCERNS.

Arts, S. C. T. R. D. C. a. T. (n.d.). Online Safety Act 2021

"Catatan Tahunan." Komnas Perempuan | Komisi Nasional Anti Kekerasan Terhadap Perempuan, https://komnasperempuan.go.id/catatan-tahunan-detail/catahu2023-kekerasan-terhadap-perempuan-di-ranah-publik-dan-negara-minimnya-perlindungan-dan-pemulihan. Accessed on 10 December 2023

Charlwood, Ryley. "What Are Novel Face Swap Deepfake Attacks and How Can You Defend Against Them? | iProov." iProov, 26 Oct. 2023, www.iproov.com/blog/face-swap-attack-deepfake.

"Deepfakes, Explained | MIT Sloan." MIT Sloan, 21 July 2020, mitsloan.mit.edu/ideas-made-to-matter/deepfakes-explained. (Accessed on 25 November 2023)

"Deepfake." Merriam-Webster Dictionary, 17 Nov. 2023, www.merriam-webster.com/dictionary/deepfake. Accessed on 22 November 2023

Intania, H., & Amelia, R. LITERATUS.

Lbhapik. "Laporan Akhir Tahun 2022 LBH APIK Jakarta." LBH APIK JAKARTA,

UNIVERSITAS GADJAH MADA
Indonesia Deepfake Non-Consensual Intimate Imagery Laws: Lessons in Improving Legal Protection in Six States
Maulana Hafiz Ardiansyah, Sri Wiyanti Eddyono, S.H., LL.M., Ph.D.
Universitas Gadjah Mada, 2025 | Diunduh dari http://etd.repository.ugm.ac.id/

17 Jan. 2023, www.lbhapik.org/2022/12/laporan-akhir-tahun-2022-lbh-apik.html. (Accessed on 10 December 2023)

"Penyidik Enggan Terapkan UU TPKS, Didik Mukrianto Desak Terbitkan Aturan Teknis." https://www.dpr.go.id/, 6 June 2023, www.dpr.go.id/berita/detail/id/44848/t/javascript;

T. First deepfake case in the Netherlands: Whoever produces fake porn using female presenters face will be prosecuted. 30 July 2023, ground.news/article/first-deepfake-case-in-the-netherlands-whoever- produces-fake-porn-using-female-presenters-face-will-be-prosecuted.

Ykp. UU TPKS Berlaku, Mengapa Korban Kekerasan Seksual Belum Juga Aman? 22 Aug. 2022, ykp.or.id/uu-tpks-berlaku-mengapa-korban-kekerasan-seksual-belum-juga-aman.

Law(s):

Australia Criminal Code Act 2018

Australia Enhanced Online Safety Act 2023 (eOSA)

California State Laws on Deepfake Pornography

China Administrative Provisions on Deep Synthesis for Internet Information Service

China Criminal Code

China Cybersecurity Law

Indonesia Law no 1 of 2023 Indonesian Revised Criminal Code 2023

UNIVERSITAS
GADJAH MADA
**Indonesia Deepfake Non-Consensual Intimate Imagery Laws: Lessons in Improving Legal Protection in
Six States**
Maulana Hafiz Ardiansyah, Sri Wiyanti Eddyono, S.H., LL.M., Ph.D.
Universitas Gadjah Mada, 2025 | Diunduh dari http://etd.repository.ugm.ac.id/

Indonesia Law no 12 of 2022 Concerning Criminal Acts of Sexual Violence (TPKS)

Indonesia Law no 44 of 2008 Concerning Pornography

Indonesia Law no. 1 of 2024 Concerning Information and Electronic Transactions

South Korea Act on Special Cases Concerning the Punishment of Sexual Crimes

South Korea Deepfake Laws

South Korea Sexual Violence Prevention and Victim Protection Act

Texas State Laws on Deepfake Pornography

UK Criminal Justice and Courts Act 2015

UK Online Safety Act (OSA)

United States Deepfakes Accountability Act (Federal Proposals)