

## Limitations on the Use of Artificial Intelligence in Presidential and Vice-Presidential Election Campaigns

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Article	Abstract
<p><b>Keywords:</b> Artificial Intelligence; Campaigns Election; Presidential Elections.</p> <p><b>Article History</b> Received: Jan 29, 2026; Reviewed: Apr 20, 2026; Accepted: Apr 29, 2026; Published: Apr 30, 2026.</p>	<p>With the advancement of digital technology, AI has been increasingly used in political campaign. This study examines the urgency of limiting the use of AI in presidential and vice-presidential election campaigns and analyzes the legal implications of Constitutional Court Decision Number 166/PUU-XXI/2023 on the use of AI in in Presidential and Vice-Presidential Election Campaign. Using a normative legal research method with statutory and case approaches, this study finds that excessive AI-based image manipulation undermines voters' rights to accurate information and threatens free and fair elections. The decision requires lawmakers to revise election regulations, obliges election participants to avoid excessive AI use, strengthens voters' access to truthful information, and mandates election management bodies to enhance oversight. This study contributes to election law and digital governance by reinforcing democratic integrity in the digital era.</p>



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### Introduction

Recent technological developments have influenced nearly all aspect of life, including the conduct of election campaign in Indonesia. The 2024 presidential and vice-presidential election was highlighted

by the massive use of Artificial Intelligence (AI) in the campaign approaches and strategies employed by all candidates. All three candidates' campaign teams openly acknowledged that AI was used to refine political images in order to attract public attention and gain electoral support, particularly from young voters.<sup>1</sup> One of the campaign methods that has recently popular is the use of AI to produce campaign videos and images. AI produces videos that are able to convey the candidates' visions, missions, and views on various issues while still following existing trends, so that those videos can attract public attention and expand the impact of the candidates' campaign.<sup>2</sup> An example of the impact of AI-based content is the admission of a voter who stated that they chose a candidate pair because they had a visually "gemoy" image generated by AI.<sup>3</sup> Other studies also state that AI-generated visual content designs and campaign billboards have successfully and significantly influenced Generation-Z (Gen-Z).<sup>4</sup>

Unfortunately, the use of AI-generated content has also created legal problems, particularly related to the personal image presented through AI-generated content. AI technology can obscure or even manipulate information by creating content that appears real but is in fact false, so that potentially harming recipients of information.<sup>5</sup> AI

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<sup>1</sup> Hafiz Noer, "Penggunaan AI semakin masif, tetapi tidak banyak mengubah lanskap kampanye politik di Indonesia", 2024, accessed at 04 October 2025 on <https://theconversation.com/penggunaan-ai-semakin-masif-tetapi-tidak-banyak-mengubah-lanskap-kampanye-politik-di-indonesia-229617>

<sup>2</sup> Silvi Fitri Ayu and Poetika Puspasari, "Masa Depan Demokrasi Indonesia: Penggunaan Artificial Intelligence ( Ai ) Untuk Pemilu Yang Aman Dan Berintegritas the Future of Democracy in Indonesia: The Use of Artificial Intelligence ( Ai ) for Safe and Integrity" 50, no. 1 (2024): 109–27, <https://doi.org/10.55981/jmi.2024.8696>.

<sup>3</sup> Kompas.com, "AI dalam Pemilu 2024: Kampanye Modern hingga Susunan Regulasi Baru", 2024, accessed at 05 October 2025 on <https://www.kompas.com/tren/read/2024/02/28/104740565/ai-dalam-pemilu-2024-kampanye-modern-hingga-susunan-regulasi-baru>

<sup>4</sup> Nuriyati Samatan and Marwan Londol, "The Use of Artificial Intelligence ( AI ) Technology and Visual Design of Campaign Billboards on The Decision to Vote For Presidential Candidates in Generation Z," *IJAM: International Journal of Advanced Multidisciplinary* 3, no. 4 (2025): 542–57. <https://doi.org/10.38035/ijam.v3i4.743>

<sup>5</sup> Valle-Cruz, D., García-Contreras, R., & Gil Garcia, J. R., *Exploring The Negative Impacts of Artificial Intelligence in Government: The Dark Side of Intelligent Algorithms and Cognitive Machines* cited on Silvi Fitri Ayu, Poetika Puspasari, Masa Depan Demokrasi Indonesia: Penggunaan Artificial Intelligence (AI) untuk Pemilu yang Aman dan Berintegritas, *Jurnal Masyarakat Indonesia*, Volume 50 No. 1, 2024, hlm. 109-127, <https://doi.org/10.55981/jmi.2024.8696>

with its advanced algorithmic system, can easily mislead voters by altering the images and videos of election participants. This certainly becomes a problem when AI-generated campaign content has the potential violate the principles of free, honest, and fair elections.

Due to the inconsistency between personal image displayed in AI-generated content during the election campaign period, Gugum Ridho Putra, with the Election Advocacy Care Team (*Tim Advokasi Peduli Pemilu* - TAPP), as the petitioner, submitted a request for judicial review of Article 1 Number 35, Article 274 Paragraph (1), Article 280 paragraph (2), Article 281 paragraph (1), Article 286 paragraphs (1) and (2), and Article 299 paragraph (1) of General Elections Law Number 7 of 2017 against the 1945 Constitution of the Republic of Indonesia to the Constitutional Court.<sup>6</sup> The petitioner submitted three principal arguments, one of which was the absence of prohibition on election participants from using personal images in the form of photos/images or other content that are excessively enhanced and manipulated with the assistance of digital technology or AI technology as if they were authentic personal images. The petitioner argued that the use of AI-generated content is contrary to the principle of honest elections. The petitioner requested that Article 1 Number 35 of General Election Law Number 7 of 2017 be amended by affirming that campaign activities and campaign materials must be conducted without digital manipulation and/or AI technology or, at the very least, requiring election participants to include information stating that the content used is the result of digital manipulation and/or AI technology.

In the considerations, the Constitutional Court stated that the norm of Article 1 Number 35 of General Elections Law Number 7 of 2017, “personal image” related to photos/images of election participants, must be interpreted conditionally by requiring election participants, must be recent photos/images of themselves without being excessively manipulated with the assistance of AI technology. Furthermore, through the ruling of Decision Number 166/PUU-XXI/2023, the Constitutional Court prohibited the use of photos/images that have been excessively manipulated by AI.

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<sup>6</sup> CNN Indonesia, “MK Resmi Larang Penggunaan Foto AI di Kampanye Pilpres & Pemilu”, 2025, accessed at 06 October 2025 on <https://www.cnnindonesia.com/nasional/20250102141800-12-1183130/mk-resmi-larang-penggunaan-foto-ai-di-kampanye-pilpres-pemilu>

Through this decision, the Constitutional Court stated that AI-generated photos/images of election participants that are excessively manipulated could make legal uncertainty and are not in accordance with the principles of free, honest, and fair elections. The Constitutional Court argued that false information can damage voters' ability to make objective and wise decisions regarding the candidate they choose, thereby harming the quality of democracy.<sup>7</sup> Constitutional Court Decision Number 166/PUU-XXI/2023 constitutes an important pillar in regulating digital campaign in Indonesia, particularly in the context of the use of AI technology, which will certainly have an impact on future elections. Therefore, legal research is necessary to analyze the limitations on the use of AI in presidential and vice-presidential election campaigns.

There are previous studies related to the topic of the use of AI. First, the research by Moh. Samsul Arifin<sup>8</sup> examined the role and impact of AI in political communication in the 2024 general election. The results of the study show that AI has a significant role in Indonesia's democratic process, particularly in shaping public opinion. AI is utilized as a political communication strategy to shape voter perspectives and increase public participation. Second, the research by Rizka Amelia Azis, Wasis Susetio, Nurhayani, and Elok Hikmawati<sup>9</sup> discusses the regulation and legal accountability of AI utilization in Indonesia in general. The results of the study explain that the characteristic of AI which processes data automatically, can be equated with the "Electronic Agent", so that AI can be positioned as a subject regulated within the legal framework and can be held legally accountable in certain situations. Third, the research by Bukhori, Nuri Shabrina, and Irwansyah<sup>10</sup> examines media framing of ethical and

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<sup>7</sup> Willa Wahyuni, "MK Larang Peserta Pemilu Gunakan Foto AI Saat Kampanye", 2025, accessed at 07 Oktober 2025 on [https://www.hukumonline.com/berita/a/mk-larang-peserta-pemilu-gunakan-foto-ai-saat-kampanye-lt67769185b1241/?utm\\_source=copy&utm\\_medium=berita&utm\\_campaign=shared\\_sosmed](https://www.hukumonline.com/berita/a/mk-larang-peserta-pemilu-gunakan-foto-ai-saat-kampanye-lt67769185b1241/?utm_source=copy&utm_medium=berita&utm_campaign=shared_sosmed)

<sup>8</sup> Moh. Samsul Arifin, "Artificial Intelligence (Ai) Dan Politik: Analisis Terhadap Peran Dan Signifikansi Ai Dalam Komunikasi Politik 2024 Di Indonesia," *Hudan Lin Naas: Jurnal Ilmu Sosial Dan Humaniora* 6, no. 1 (2025): 47, <https://doi.org/10.28944/hudanlinnaas.v6i1.1860>.

<sup>9</sup> Rizka Amelia Azis et al., "Pengaturan Dan Pertanggung Jawaban Pemanfaatan Artificial Intelligence (Ai) Di Indonesia Dalam Perspektif Hukum," *Forum Ilmiah* 20, no. 4 (2023): 243–54, <https://share.google/2pn5ckSF7Iy14XGpO>

<sup>10</sup> Bukhori, Nuri Shabrina, Irwansyah, "Framing Pemberitaan Etika Dan Regulasi Penggunaan Foto Artificial Intelligence (AI) Pada Kampanye," *Komuniti: Jurnal*

regulatory issues related to the use of AI-generated photos in campaigns following Constitutional Court Decision Number 166/PUU-XXI/2023. The results of the study explain that there are differences among four online media news, which are Kompas.com, Tirto.id, Fajar.co.id, and CNBC Indonesia, in framing the Constitutional Court's decision. The framing presented contains criticism regarding the lack of ethics and regulation amid advances in AI technology. In general, all four media frame the Constitutional Court's decisions as an affirmative step toward achieving elections with integrity, as well as highlighting legal uncertainty regarding "personal image". Fourth, the research by Putri Rizkika Bahri, M. Galang Asmara, and Muh. Risnain<sup>11</sup> examines various forms of AI use in elections and their regulations. The results of the study explain that the use of AI in political campaigns need to be strictly limited. AI-generated campaign content must include watermarks, must not different from reality, must not contain elements of racism, and must not use individual identities without consent, and also emphasize the urgency of establishing supervisory institutions and specific regulations related to AI. Fifth, the research by Muhammad Luthfi Maulana and Budi Harjono<sup>12</sup> examines the impact of the use of AI technology in political contestation in Indonesia. The result of the study explain that the Prabowo-Gibran campaign used AI for visual design with the aim of increasing communication effectiveness on social media. This has proven effective but has the potential to position the public as passive communicators and create the risk of a decrease in democratic principles.

Different from the previous studies, this research specifically focused on examining why the use of Artificial Intelligence in presidential and vice-presidential election campaigns needs to be restricted, and analyzing the implications of Constitutional Court Decision Number 166/PUU-XXI/2023 for the use of Artificial

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*Komunikasi Dan Teknologi Informasi* 17, no. 2 (2025): 384–407, <https://doi.org/10.23917/komuniti.v17i2.11236>.

<sup>11</sup> Putri Rizkika Bahri, H. M. Galang Asmara, and Muh. Risnain, "Artificial Intelligence (AI)-Based Campaign in the Implementation of General Elections," *RESEARCH REVIEW International Journal of Multidisciplinary* 9, no. 2 (2024): 117–27, <https://doi.org/10.31305/rrijm.2024.v09.n02.012>.

<sup>12</sup> Muhammad Luthfi Maulana et al., "Politik Dan Ai: Gaya Komunikasi Kampanye Politik Capres Prabowo-Gibran," *Jurnal Komunikasi Dan Media* 04, no. 02 (2024): 159–69. DOI: 10.24167/jkm.v4i2.11814

Intelligence in the conduct of presidential and vice-presidential election campaigns.

## Method

This research is normative legal research employing a statutory approach and a case approach. The data sources used in this study are secondary data, consisting of primary legal materials, secondary legal materials, and tertiary.<sup>13</sup> The primary legal materials include the 1945 Constitution of the Republic of Indonesia, General Election Law Number 7 of 2017, General Election Commission Regulation Number 15 of 2023 on Election Campaign, and Constitutional Court Decision Number 166/PUU-XXI/2023. Secondary legal material comprises relevant academic journals and legal publications, while tertiary consist of legal dictionaries and legal encyclopedias. Data collection was conducted through a literature study by examining relevant sources. Data analysis was carried out using a descriptive-analytical method.

## Result and Discussion

### A. Understanding Artificial Intelligence in Presidential Election

Before elaborating on the limits of the use of Artificial Intelligence (AI) in presidential and vice-presidential election campaigns, it is important to first clarify what is meant by AI and electoral campaigns. Artificial Intelligence refers to a machine-based system designed to process data or inputs, whether for explicit or implicit purposes, in order to generate outputs such as predictions, recommendations, content, or decisions that may influence both physical and digital environments. In a more restrictive sense, AI may also be understood as a computer-based imitation of human intelligence.<sup>14</sup> Other scholars describe AI as intelligence embedded

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<sup>13</sup> Sholahuddin Al-Fatih, *Perkembangan Metode Penelitian Hukum Di Indonesia, Pertama* (Malang: Universitas Muhammadiyah Malang, 2023), pp. 4.

<sup>14</sup> Haroon Sheikh, Corien Prins, and Erik Schrijvers, "Artificial Intelligence: Definition and Background," in *Mission AI: Research for Policy* (Den Haag: Springer Cham, 2023), 15–41, <https://doi.org/https://doi.org/10.1007/978-3-031-21448-6>.

within a system that can be structured and applied within a scientific context.<sup>15</sup>

Meanwhile, under Article 1 point (35) of Law No. 7 of 2017 on General Elections, an electoral campaign is defined as an activity conducted by election participants, including presidential and vice-presidential candidates, or by other parties designated by them, to persuade voters by presenting their vision, mission, programs, and/or personal image. Within the context of this study, the use of AI in campaigns refers to the deployment of such intelligent systems to produce content, particularly in the form of personal image construction, that may influence voters' preferences. It is precisely the excessive use of AI to enhance or construct such personal image that has emerged as a significant issue in electoral practice, thereby giving rise to proposals for limiting the use of AI in political campaigns.

## **B. The Urgency of Limiting the Use of Artificial Intelligence in Presidential and Vice-Presidential Election Campaign**

The limitation on the use of Artificial Intelligence (AI) in the conduct of election campaigns began with the judicial review of the General Election Law and the issuance of Constitutional Court Decision Number 166/PUU-XXI/2023. The petition for judicial review of the General Election Law was submitted by Gugum Ridho Putra, an advocate focusing on constitutional and electoral issues, as the Petitioner and represented by the Election Advocacy Care Team (TAPP). The petitioner alleged a violation of constitutional rights as a voter, as guaranteed under Article 28F of the 1945 Constitution of the Republic of Indonesia concerning the right to obtain correct information, as well as Article 22F Paragraph (1) of the 1945 Constitution of the Republic of Indonesia, which affirms that elections must be conducted directly, publicly, freely, confidentially, honestly, and fairly. The object of review in this case included Article 1 Number (35), Article 274 paragraph (1), Article 280 paragraph (2), Article 281 paragraph (1), Article 286 paragraphs (1) and (2), and Article 299 paragraph (1) of General Elections Law Number 7 of 2017. One of the main focuses of the petition was the phrase "personal image of election participants", which was considered not to provide clear

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<sup>15</sup> Joseph Teguh Santoso, *Kecerdasan Buatan (Artificial Intelligence)* (Semarang: Yayasan Prima Agus Teknik & Universitas Stekom, 2023).

limitations, thereby opening a chance for the use of photo or images of election participants that are excessively manipulated using digital technology or AI.

The petitioner argued that the absence of an explicit prohibition on the manipulation of personal images using AI has the potential to violate voters' right to obtain correct information. Such manipulation may create hyperreality, a condition in which artificial visual representations appear more real than the actual conditions, thereby obscuring public perceptions of the character and capacity of election participants. In the context of voters who has limited rationality and tends to rely on visual judgment as a shortcut in making political choices, excessive manipulation of personal images is considered capable of influencing electoral preferences based on misleading information. Therefore, the Petitioner requested that the phrase "personal image" be conditionally interpreted as photos or images that are original, recent, and not excessively manipulated using AI technology, or at the very least require clear disclosure when campaign content is the result of digital technology or AI manipulation.<sup>16</sup>

In response to the petition, The President and the House of Representatives (DPR) had submitted their statements. Unfortunately, the DPS's statement was not considered by the Court because it was submitted after all stages of the trial and the submission of the conclusion had been completed.<sup>17</sup> On the other hand, the Government requested the Panel of Constitutional Court Justices to accept the President's stamen in its entirety and to declare that all provisions under review were not contrary to the 1945 Constitution and therefore remained valid and legally binding. The Government argued that the use of AI in campaigns constitutes part of freedom of expression and innovation in political communication protected within the democratic system. The Government also contented that in the absence of explicit prohibitions in statutory regulations, the use of AI cannot be considered an unlawful act, referring to the principle of *nullum delictum nulla poena sine praevia lege poenali*.

With regard to the petition, The Court subsequently set out its legal considerations, as contained on page 121 of Constitutional Court Decision Number 166/PUU-XXI/2023. The Court began its consideration of the phrase "personal image" of election participants

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<sup>16</sup> Constitutional Court Number 166/PUU-XXI/2023 page 36

<sup>17</sup> *Ibid*, page 117

as stipulated in the Article 1 Number 35 of the General Election Law. The Court stated that the primary requirement for achieving a democratic and transparent political system is the existence of honest and fair election. Honest and fair election provide opportunities for the people to express their political voices and views freely and safely.<sup>18</sup> In addition, transparent elections provide access to information that enables the public to receive accurate information so that they can make electoral choices based on clear understanding. The court was of the opinion that such conditions are necessary to realize democratic representation. The Court further added that incomplete and non-comprehensive information would result in the loss of the primary tool for the people to democratically choose their leaders. Consequently, the elected leaders would not be figures capable of truly representing the needs of the peoples.<sup>19</sup>

According to the Great Dictionary of Indonesian Language (KBBI), “personal image” refers to the way of a person views themselves, including their abilities or appearance.<sup>20</sup> In the context of Article 1 Number 35, personal image is not limited to physical appearance but also includes representations of election participants embodied in photos/images used to persuade voters to support the respective election participants. Therefore, presenting photos/images of election participants that correspond to their real or actual condition constitutes an implementation of the principle of honesty. The Court was the opinion that the meaning of the phrase “personal image” does not provide clear limitations as regulated in Article 1 Number 35 of the General Election Law. This condition may result in multiple interpretations or legal ambiguity and create opportunities for practices involving manipulated identities that are inconsistent with the principles of free, honest, and fair elections. The Court further added that excessively manipulated personal images may harm voters and damage the quality of democracy. Accordingly, the Court held that Article 1 Number 35 of the General Election Law requires a conditional interpretation. The Court ruled that the phrase “personal image” relating to photos/images in Article 1 Number 35 of General Election Law Number 7 of 2017 is contrary to the 1945 Constitution of the Republic of Indonesia and has no binding legal force insofar as it is not interpreted as “photos/images or oneself that are original and

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<sup>18</sup> *Ibid*, pages 121-122

<sup>19</sup> *Ibid*, pages 123

<sup>20</sup> *Ibid*, page 122

recent and not excessively engineered or manipulated with the assistance of AI technology”

Based on the authors perspective, following Constitutional Court Decision Number 166/PUU-XXI/2023, it is necessary to impose limitations on the use of AI in the next presidential election campaigns. This necessity is based on four arguments. First, from a democratic perspective. Joseph A. Schumpeter defines democracy as an institutional arrangement that allows political decisions to emerge through competitive mechanism for the people’s support.<sup>21</sup> This definition emphasizes fair political competition, as the selection of President and Vice-President through electoral processes. When personal images presented in campaign are the result of AI manipulation, such images no longer reflect the actual condition of election participants. This situation becomes a threat to political competition because it creates inequality among election participants. as a result, election participants no longer compete based on substantive quality, but rather on manipulated visual impressions. Reflecting on the 2024 presidential election, the Prabowo-Gibran candidate pair was among those who extensively used AI during the campaign. The use of AI produces a “gemoy” branding or personal image that sharply contrasted with Prabowo’s previous image as firm and aggressive.<sup>22</sup> This strategy successfully attracted public attention and generated support for the Prabowo-Gibran candidate.<sup>23</sup> Ultimately, competition was no longer based on the substance of vision and mission, but on visual appearances that manipulated using AI. This condition is clearly inconsistent with the concept of democracy as defined by Joseph A. Schumpeter.

Robert A. Dahl emphasizes that one of the requirements for achieving ideal democracy is that public obtains enlightened understanding of democratic practices.<sup>24</sup> Elections, as democratic

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<sup>21</sup> Muhamad Ibnu Armandhani, “The Spread of Democracy in China,” *Journal Of Global Strategic Studies* 4, no. 2 (2024): 146–71, <https://doi.org/10.36859/jgss.v4i2.2602>.

<sup>22</sup> Muhammad Luthfi Maulana et al., *Loc.Cit.*

<sup>23</sup> Deny Noer Wahid and Ilham Dwi Rafiqi, Manifestation of Eastern Cultural Values by Re-arranging Norm on Insulting the President and Vice President, *Hang Tuah Law Journal* 6, no. 1, (2022): 61–76. <https://doi.org/10.30649/htlj.v6i1.76>.

<sup>24</sup> M Reza Saputra and Nabila Hilyatunisa, “Redefining Executive Power : Evolution of Presidential and Vice Presidential Roles in Indonesia ’ s Post -Amendment Constitutional System,” *LITERACY : International Scientific Journals of Social , Education ,*

events, must therefore be conducted by providing voters with enlightened understanding to enable them to make informed choices. In relation to the conduct of campaign using AI-manipulated photos/images, this practice potentially violates one of these criteria, which is enlightened understanding. When visual information received by the public has been manipulated using AI and no longer authentically represent the character or real condition of the election participants, the public loses access to enlightened understanding of issues and candidates. As previously explained by the authors, blurred or inaccurate information leads to decisions that are not based on rational and objective considerations. This means that the public does not make wise electoral choices because they do not receive enlightened understanding, resulting in the failure to fully achieve Dahl's ideal democratic criteria.

If we look at the implementation of the 2024 presidential election, the use of AI in campaign was proven capable of constructing a “gemoy” personal image of Prabowo, which subsequently succeeded in attracting significant attention and support, particularly from young voters.<sup>25</sup> Unfortunately, this resulted in voting decisions that were not based on enlightened understanding. For example, Putri, a source cited in *The Straits Times*, stated that she voted for Prabowo because of his “gemoy” personal image, which was her primary reason.<sup>26</sup> That statement demonstrates decision-making based only on visual impressions rather than careful consideration. This serves as evidence that the manipulation of photos/images using AI technology results in the loss of public access to enlightened understanding.

The Constitutional Court's decisions prohibiting the excessive use of AI to manipulate photos/images in constructing personal image strengthens democratic values because the Court support fair political competition based on the substance of vision and mission rather than visual appearance. The decision ensures that the personal images presented to the public are authentic, enabling the public to

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*Humanities* vol 4, no. 2 (2025): 440–51,  
<https://doi.org/10.56910/literacy.v4i2.2697>.

<sup>25</sup> Fachmi Khadam Haeril, “Desain Makna Visual Citra Politik Berbasis Ai : Kajian Hermeneutika Fenomena ‘ Gemoy ,’ ” *ARTIKA: Jurnal Fakultas Desain* Vol.9, no. No.2 (2025): 163–75, <https://doi.org/10.34148/artika.v9i2.1354>.

<sup>26</sup> *The Straits Times*, “Generative AI Faces Major Test as Indonesia Hold Largest Election Since Boom in Its Use”, 2024, accessed at 04 December 2025 on <https://www.straitstimes.com/asia/generative-ai-faces-major-test-as-indonesia-holds-largest-election-since-boom>

objectively assess candidates based on actual conditions rather than the result of AI manipulation. This condition leads to the emergence of wise decision by the people as voters.

Second, based on Article 1 Number 35 of the General Election Law, elections are instrument for the exercise of popular sovereignty and must be conducted directly, publicly, freely, confidentially, honestly, and fairly. In practice, excessive AI-based manipulation of candidates' photos/images in constructing personal image constitutes conduct that is contrary to the principle of honesty, as the resulting visuals no longer reflect the actual condition of election participants. Through its decision, the Court reaffirmed the prohibition of such manipulation, thereby ensuring that the personal images of election participants presented to the public must correspond to their actual condition. In this way, the Constitutional Court's decision strengthens the implementation of the principle of honesty in elections.

Ramlan Surbakti outlines seven criteria for determining whether elections are conducted fairly and with integrity, including: (1) the existence of legal certainty consistent with the principles of direct, public, confidential, honest, and fair elections; (2) the presence of free and fair competition among election participants; and (3) the guarantee of electoral integrity at every stage of the electoral process.<sup>27</sup> The use of AI to excessively manipulate photos/images of election participants and employ them to construct personal images in campaigns clearly contradicts the first and second criteria. As previously explained by the author using democratic theory, excessive AI-based manipulation of personal images violates the principle of honesty because it does not reflect actual conditions and can be considered deceptive to the public as information recipients. his practice undermines the essence of campaigning and creates unhealthy competition. The Constitutional Court's decision ensures legal certainty and alignment with the principle of honest elections by prohibiting excessive use of AI, thereby ensuring that the information received by voters is accurate. The decision also supports fair competition among election participants by emphasizing the core of elections, which is the presentation of vision and mission. As a result, electoral competition can proceed in a healthy manner, with voters

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<sup>27</sup> Mohammad Syaiful Aris, "Penataan Sistem Pemilihan Umum Yang Berkeadilan Untuk Penguatan Sistem Presidensiil Di Indonesia," *Yuridika* 33, no. 2 (2018): 290, <https://doi.org/10.20473/ydk.v33i2.7379>.

making choices based on rational considerations rather than manipulated personal images.

Interestingly, each electoral cycle is always included with a campaign period for candidate pairs, indicating that campaigns constitute a highly important agenda in the conduct of presidential elections. Therefore, campaigns must be conducted honestly and informatively. However, the presence of AI that enables excessive manipulation of photos/images to construct personal images poses a threat to the quality of presidential elections.

In this context, the Constitutional Court's decision serves as a "*breath of fresh air*" in addressing contemporary challenges in presidential elections. The decision provides limitations on the use of AI in manipulating photos/images in campaigns, ensuring that voters are not trapped in "branding" that is merely the result of AI manipulation. Based on the foregoing analysis, it can be stated that the Constitutional Court's decision ultimately serves as a solution to the challenges of presidential elections and supports the realization of honest and informative elections.

Third, campaign, based on Article 1 Number (35) of the General Election Law, is defined as activities conducted by election participants to persuade voters by offering vision, mission, programs, and/or personal images. Therefore, campaigns function as a means of political education for the public prior to the voting period. Political education requires that the public be able to fully recognize and understand the characters or values of the election participants. Accordingly, honesty and accuracy of information constitute fundamental requirements for campaigns to function as instruments of political education. The manipulation of photos/images using AI clearly contradicts this principle because it obscures communication messages and produces inauthentic representations of candidates. For this reason, the Constitutional Court's decision is relevant and appropriate, as it ensures that personal images presented remain honest and free from manipulation.

When AI is used to create manipulated personal images, many members of the public are influenced by false images that do not correspond to the actual quality and condition of election participants. AI-based manipulation of personal images shifts campaigns away from the substance of vision, mission, and programs, focusing instead on visual image-building. Without control mechanisms, such manipulation may result in large-scale misinformation. Therefore, the

limitations imposed by the Constitutional Court prevent misleading or deceptive campaign influences and ensure that campaign impacts derive from substantive content and honest personal images. This reinforces the Court's decision as a progressive step in protecting the quality of voters' political decision-making as showing the urgency for limiting the use of AI in political campaign.

Based on Article 274 paragraph (1) letter (a) of the General Election Law, presidential election campaign materials should contain the vision, mission, and programs of candidate pairs. Campaign materials should contain correct information and spread positive content so that the public can recognize and understand appropriate information. Unfortunately, advances in AI technology have created opportunities for election participants to excessively manipulate photos/images, making them inauthentic. AI transforms campaign materials into manipulated visuals that no longer represent the authentic personal image of election participants. As a result, campaign materials no longer reflect factual conditions but merely construct personal images adjusted to public preferences. The combination of broad campaign methods and excessively manipulated AI-based materials poses a threat to campaign integrity. Campaigns lost its function as means of honest information dissemination and instead become tools for constructing false personal images. This condition clearly contradicts the concept of positive campaigning and ultimately degrades the quality of electoral campaigns.

As an example, the massive use of AI in disseminating campaign materials during the 2024 presidential election was carried out by the Prabowo–Gibran candidate pair. AI-generated cartoon images of Prabowo were displayed on billboards across Indonesia.<sup>28</sup> Large banners featuring AI-manipulated images of Prabowo and Gibran were also installed.<sup>29</sup> Another method used by the Prabowo–Gibran involved distributing T-shirts featuring AI-manipulated cartoon images of Prabowo. The cartoon version of Prabowo was also distributed in the form of stickers uploaded with the hashtag #Prabowo on the

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<sup>28</sup> Voa Indonesia, "Gemoy 'Everywhere': Disrupsi AI Jadi Ujian dalam Pemilu 2024", 2024, accessed at 8 December 2025 on <https://www.voaindonesia.com/a/gemoy-everywhere-disrupsi-ai-jadi-ujian-dalam-pemilu-2024/7479185.html>

<sup>29</sup> Agus Priatna, "Foto: Melihat Baliho Politik Prabowo-Gibran Hasil Teknologi AI", 2023, accessed at 8 December 2025 on <https://www.inilah.com/foto-melihat-baliho-politik-prabowo-gibran-hasil-teknologi-ai>

TikTok application and was viewed 19 billion times.<sup>30</sup> In this context, Constitutional Court Decision Number 166/PUU-XXI/2023 is both appropriate and important. This measure is necessary to ensure that campaign materials remain focused on candidates' visions, missions, and programs and provide accurate information. The Court's decision encourages campaigns to return to their original purpose as instruments of political education for the public. Therefore, from the perspective of campaign theory, the limitation of the use of AI in Presidential and Vice-Presidential Election Campaign are highly needed are urgent.

In the other hand, technology will continue to develop over time. The 1945 Constitution mandates the government to support technological development to advance civilization and public welfare.<sup>31</sup> While technology serves to assist humanity, it also poses threats to the implementation of constitutional values.<sup>32</sup> Thus, it is clear that technological development and use cannot be entirely halted, but clear limitations are necessary. Accordingly, it is essential for the constitution to provide concrete limitations on the use of technology to prevent violations of fundamental rights. The concept of a digital constitution emerges as an effort to extend the reach of constitutional principles so that they remain relevant in the digital sphere. Digital constitutionalism aims to adapt constitutional values to the governance of modern technology, requiring that technological use remain subject to constitutional norms, particularly the protection of fundamental rights such as the right to accurate information, personal data protection, and freedom of expression. In the context of elections, digital constitutionalism plays an important role because the use of AI in campaigns may harm the fundamental rights. AI-based manipulation of photos/images can create false personal images that

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<sup>30</sup> Voa Indonesia, "Gemoy 'Everywhere': Disrupsi AI Jadi Ujian dalam Pemilu 2024", 2024, accessed at 8 December 2025 on <https://www.voaindonesia.com/a/gemoy-everywhere-disrupsi-ai-jadi-ujian-dalam-pemilu-2024/7479185.html>

<sup>31</sup> Article 31, paragraph (5) of the 1945 Constitution of the Republic of Indonesia states that "The Government shall advance science and technology by upholding religious values and national unity for the advancement of civilization and the welfare of humankind."

<sup>32</sup> Siti Fatimah, "Transformasi Ruang Publik Digital: Tantangan Sosial Dan Konstitusional Dalam Demokrasi Era Media Baru," *Cakrawala: Jurnal Litbang Kebijakan* 19, no. 1 (2024): 67–86, <https://doi.org/10.32781/%0Acakrawala.v19i1.785>.

threaten the constitutional right to obtain correct information as guaranteed under Article 28F of the 1945 Constitution.<sup>33</sup>

From a human rights perspective, the state is fundamentally permitted to impose limitations on the exercise of certain rights. This is based on Article 28J paragraph (2) of the 1945 Constitution, which allows the state to restrict the exercise of rights and freedoms to ensure recognition and respect for the rights of the Indonesian people.<sup>34</sup> In the context of AI use in campaigns, the state must not prohibit all technological use but is entitled to impose limitations to ensure democratic elections. Such limitations relate to Article 22E paragraph (1) of the 1945 Constitution, which requires elections to be conducted directly, publicly, freely, confidentially, honestly, and fairly.<sup>35</sup> Limiting the use of AI in campaigns constitutes an effort to ensure the realization of honest elections. Therefore, the limitation imposed by the Constitutional Court, which prohibiting excessive AI-based manipulation of photos/images, constitutes a legitimate restriction because it does not entirely prohibit AI use, but only prohibits practices that create false personal images and disrupt electoral integrity.

Digital constitutionalism theory emphasizes the need for proportional, measurable limitations oriented toward the protection of fundamental rights<sup>36</sup>. In this context, Constitutional Court Decision Number 166/PUU-XXI/2023 represents a progressive and highly relevant response. The decision does not prohibit AI use in its entirety, but specifically prohibits excessive manipulation of election participants' photos/images. This constitutes a form of limitation aligned with the concept of a digital constitution, as it continues to support technological development while protecting human rights,

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<sup>33</sup> Article 28F of the 1945 Constitution of the Republic of Indonesia states that every individual has the right to communicate and to access information for the development of personal capacities and the social environment, as well as the right to seek, obtain, possess, store, process, and disseminate information through any available means

<sup>34</sup> Article 28J(2) of the 1945 Constitution of the Republic of Indonesia affirms that the exercise of individual rights and freedoms may be restricted by law exclusively to ensure due recognition and respect for the rights and freedoms of others, and to meet just requirements based on moral considerations, religious values, security, and public order within a democratic society.”

<sup>35</sup> Article 22E, paragraph (1) of the 1945 Constitution of the Republic of Indonesia

<sup>36</sup> Francisco de Abreu Duarte, Giovanni De Gregorio, and Angelo Jr Golia, “Perspectives on Digital Constitutionalism,” *Research Handbook on Law and Technology*, 2023, 315–29, <https://doi.org/10.4337/9781803921327.00028>.

particularly the right to obtain accurate information, and ensuring democratic elections. Therefore, the author concludes that the limitation of the use of AI is urgently needed based on the digital constitutionalism theory.

### C. The Implications of Constitutional Court Decision Number 166/PUU-XXI/2023 for the Use of Artificial Intelligence in Presidential and Vice-Presidential Election Campaign

Decision Number 166/PUU-XXI/2023 has significant implications for lawmakers in responding to the dynamics of election campaigns in the digital era. The Constitutional Court's decision necessitates lawmakers to revise the General Election Law. Notably, this aligns with the plan to revise Law Number 7 of 2017 on General Elections, which has been included in the 2026 National Legislative Program (Prolegnas) Priority and is scheduled for comprehensive discussion in 2026.<sup>37</sup> Lawmakers may utilize this momentum to revise the Election Law in accordance with the Constitutional Court's decision. Revision or improvement of the Election Law is required to clarify the definition of personal image as well as the limits or indicators of what constitutes "excessive" use of AI because such matters are not addressed in the Constitutional Court's decision. Without clear parameters, the prohibition on excessive use of AI will be difficult to enforce and may result in legal uncertainty for both election participants and election organizers.

However, the limits of AI use in manipulating photos or images can be assessed through the framework of digital constitutionalism, particularly based on the principles of transparency, accountability, and proportionality. First, transparency requires that any AI-generated or AI-modified campaign image be clearly disclosed through labeling, so that voters are aware that the content is not entirely authentic. The absence of such disclosure may render the use of AI excessive, as it prevents voters from distinguishing between factual representation and artificial construction. The labeling of AI-generated images should be placed at the center of the image so that it can be immediately

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<sup>37</sup> KPU Kabupaten Jayawijaya, "UU Pemilu 2026, Menuju Reformasi Demokrasi Indonesia di Pemilu 2026", 2025, accessed at 3 Januari 2026 on [https://kab-jayawijaya.kpu.go.id/blog/read/7929\\_uu-pemilu-2026-menuju-reformasi-demokrasi-indonesia-di-pemilu-2029](https://kab-jayawijaya.kpu.go.id/blog/read/7929_uu-pemilu-2026-menuju-reformasi-demokrasi-indonesia-di-pemilu-2029)

visible to the public, and the watermark must be permanent to ensure that it cannot be removed. Second, accountability requires that all campaign visuals reflect verifiable and accurate information. AI use becomes problematic when it produces representations that deviate from actual conditions and present fabricated realities as if they were true, in which case the candidate must be held responsible. Third, proportionality is closely linked to the principles of non-manipulation and electoral integrity. In principle, AI may be used for various legitimate purposes, such as enhancing image quality, adjusting color contrast or lighting, or adding minor visual elements.

However, such use becomes excessive when AI-driven manipulation alters objective facts, fabricates events that never occurred, or represents candidates in a manner inconsistent with their actual condition. Such practices may ultimately influence voters' decision-making, thereby undermining the fairness of competition and compromising the integrity of the electoral process.

From the perspective of digital constitutionalism, the digital sphere represents an expansion of constitutional space that must be regulated to ensure the protection of citizens' rights, including the right to accurate information in elections.<sup>38</sup> The formulation of revisions to electoral law based on digital constitutionalism is essential, as the right of citizens to obtain accurate information constitutes part of the State's obligation to protect human rights. Accordingly, lawmakers are required to clearly formulate definitions and limitations on the use of AI, both in statutory provisions and in implementing or technical regulations, to serve as guidelines for future election campaigns. Such regulatory formulation, within the framework of digital constitutionalism, should be grounded in the principles of openness, accountability, and public participation. In this regard, Indonesia recognizes the concept of meaningful participation, which affirms the right of the public to be heard, considered, and provided with explanations.<sup>39</sup> Therefore, lawmakers must ensure that

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<sup>38</sup> Muhammad Khaidir Kahfi Natsir and Magdhalena Tasik Todingrara, "Konstitusionalisme Digital: Membangun Kerangka Hukum Untuk Tata Kelola Penyelenggaraan Negara Di Era Teknologi," *Terang: Jurnal Kajian Ilmu Sosial, Politik Dan Hukum* 2, no. 3 (2025): 51–60, <https://doi.org/10.62383/terang.v2i3.1286>.

<sup>39</sup> Adriani Henny, "Partisipasi Bermakna Sebagai Wujud Asas Keterbukaan Dalam Pemb," *UNES Journal of Suara Justisia* 7, no. 1 (2023): 306–18, <https://creativecommons.org/licenses/by/4.0/>.

meaningful participation is fully implemented in the revision of the Election Law.

Furthermore, the Constitutional Court's decision also requires lawmakers to formulate clear and proportionate sanctions for violations involving the excessive use of AI in manipulating election campaign photos/images. These sanctions are crucial because of the prohibition and the importance of maintaining election participant compliance, ensuring that the Constitutional Court's decision prohibiting the excessive use of AI in campaign photos/images is enforced by all parties.

Lawmakers may also look to the practices of other countries that have already established regulations regarding the use of AI in campaigns to provide a general overview. Examples include the practices of the United States and Brazil, which have expressly regulated the use of AI in campaigns. The United States has regulations that ensure voters can obtain accurate information and avoid misleading content by strictly prohibiting the use of AI to deceive voters.<sup>40</sup> The United States also emphasizes the obligation of parties to include clear statements for AI-generated content to prevent voters from being misinformed.<sup>41</sup> This has also been practiced by Brazil, which has regulations that emphasize clear and easily accessible labelling of AI-generated content so that the public is not deceived and can clearly understand that the content is AI-generated.<sup>42</sup> Brazil also does not completely ban the use of AI, but limits its use to improving photo/image quality, creating logos, and compiling campaign image compositions.<sup>43</sup>

A further implication of the Constitutional Court's decision is the need to harmonize laws and regulations governing the use of AI in manipulating photos/images during campaigns. This is because the use of AI and election campaigns intersects with other legal instruments beyond the General Election Law. Election campaigns

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<sup>40</sup> The National Conference of State Legislatures, "*AI in Elections: A Look at the Federal and State Legislative Landscape*", 2024, accessed at 13 November 2025 on <https://www.ncsl.org/elections-and-campaigns/ai-in-elections-a-look-at-the-federal-and-state-legislative-landscape>

<sup>41</sup> *Ibid.*

<sup>42</sup> DFRLab and NetLab UFRJ, "*Regulating the use of AI for Brazilian elections: what's at stake*", 2024, accessed at 13 November 2025 pada <https://netlab.eco.ufrj.br/en/post/regulating-the-use-of-ai-for-brazilian-elections-what-s-at-stake>

<sup>43</sup> *Ibid.*

that use AI to enhance or manipulate photos/images of election participants are also related to electronic systems, data usage, information broadcasting, and the role of digital platforms. Therefore, limitations on the use of AI in campaigns cannot be separated from other regulations such as the Law on Electronic Information and Transactions (ITE Law), the Broadcasting Law, General Election Commission (KPU) regulations, Election Supervisory Body (Bawaslu) regulations, and other related regulations. Such harmonization is necessary to prevent regulatory overlap among laws and regulations. Accordingly, lawmakers are required to ensure that revisions to the Election Law are integrated within a consistent regulatory framework, so that the prohibition on excessive use of AI in campaigns can be effectively enforced.

Furthermore, in relation to the Law on Electronic Information and Transactions, it is essential to emphasize a clear division of roles between the two legal regimes. The Law No. 11 of 2008 on Electronic Information and Transactions should primarily focus on the medium, namely the use of AI within platforms and electronic systems, including the processes of content dissemination and control. Conversely, the Law No. 7 of 2017 on General Elections should place greater emphasis on the substance of campaigns, particularly in ensuring that the use of AI by electoral participants does not exceed permissible limits and maintains the integrity of information. Such a functional division would minimize the risk of overlapping authority while fostering more effective coordination. In practice, the Ministry of Communication and Informatics of the Republic of Indonesia may assume responsibility for managing and controlling digital content, whereas the General Elections Supervisory Agency, together with the General Elections Commission, would focus on supervising the compliance of electoral participants.

Another implication of the Constitutional Court's decision is the emergence of questions regarding the prohibition of AI use during campaigns in the context of regional elections (*Pilkada*). Specifically, this concerns whether the prohibition on excessive AI-based manipulation of photos/images during campaigns also applies to regional elections. Formally, the object of judicial review in the Constitutional Court's decision was the phrase "personal image" in the General Election Law, meaning that the reviewed norm directly applies only to election participants. However, regional elections are particularly closely related to general elections, as both constitute

processes for electing leaders by the people and involve campaign activities.<sup>44</sup> Therefore, lawmakers also need to consider the application of prohibitions on AI use in campaigns during regional elections.

Referring to Law Number 1 of 2015 on the Stipulation of Government Regulation in Lieu of Law Number 1 of 2014 on the Election of Governors, Regents, and Mayors into Law, Article 1 Number (21) defines campaigns in regional elections as activities conducted to persuade voters by offering the vision, mission, and programs of candidates for Governor, Regent, and Mayor.<sup>45</sup> Based on this definition, the phrase “personal image” does not explicitly appear. Nevertheless, in practice, it is highly possible for candidates to use AI in their campaign materials. Candidates may use AI to enhance photos or images used in campaigns to build “branding” and attract public attention.<sup>46</sup> As a result, the public may be unable to make informed and wise electoral choices. This condition is clearly contrary to democratic values. Moreover, regional elections itself form part of the democratic system and must also be conducted in accordance with the principles of direct, public, free, confidential, honest, and fair elections.<sup>47</sup>

If the prohibition on excessive AI-based manipulation of photos/images is not applied in regional elections campaigns, it will certainly lead to political imbalance. AI could be freely used to manipulate photos/images of regional elections candidates without limitation. Such imbalance has the potential to degrade the quality of democracy in Indonesia. In this context, the Constitutional Court’s decision prohibiting excessive AI-based manipulation of photos/images in campaigns should be considered by lawmakers to reorganize campaign regulations in regional elections to align with campaign regulations in general elections. As a consequence, the

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<sup>44</sup> Mohamad Slamet et al., “Sinergitas Pemprov DKI Jakarta Dan Satkowil Dalam Mencegah Konflik Sosial Menjelang Masa Pemilu Serentak Tahun 2024,” *Jurnal Prinsip Volume* 1, no. 1 (2024): 288–303, <https://ejournal.fisip.unjani.ac.id/index.php/prinsip>.

<sup>45</sup> Law No. 1 of 2015 on the Enactment of Government Regulation in Lieu of Law No. 1 of 2014 concerning the Election of Governors, Regents, and Mayors into Law, Article (1) Number 21.

<sup>46</sup> Muhammad Muhaemin, “Penggunaan Gambar Artificial Intelligence (AI) Dalam Kampanye Pemilihan Gubernur: Analisis Diskursus Visual,” *Jurnal Imajinasi* 8, no. 2 (2024): 180–89, <https://doi.org/10.36859/prinsip.v1i1.2935>.

<sup>47</sup> Law No. 1 of 2015 on the Enactment of Government Regulation in Lieu of Law No. 1 of 2014 concerning the Election of Governors, Regents, and Mayors into Law, Article (2).

Regional Election Law requires prompt revision, including the need to adopt the principles and normative formulations of the Election Law, particularly with regard to regulating the prohibition of excessive use of artificial intelligence in constructing personal image. This alignment is necessary to achieve democratic elections across all levels of electoral processes in Indonesia.

Furthermore, based on Article 1 Number 27 of the General Election Law, election participants fall into three categories, namely 1) political parties in the election for members of the House of Representatives (DPR), Provincial Regional People's Representative Councils (DPRD provinces), and Regency/Municipal Regional People's Representative Councils (DPRD regencies); 2) individual candidates for the election of members of the Regional Representative Council (DPD); and 3) presidential and vice-presidential candidate pairs proposed by political parties or coalitions of political parties.<sup>48</sup> Constitutional Court Decision Number 166/PUU-XXI/2023 has direct consequences for all election participants, especially regarding the creation and delivery of campaign materials in shaping self-image. This decision requires election participants to re-arrange their campaign strategies by no longer using AI to manipulate photos/images excessively. Through the Constitutional Court Decision, personal image is defined as photos/images of oneself that are original and recent and not engineered/manipulated excessively with the assistance of artificial intelligence (AI) technology.<sup>49</sup>

As a result, election participants are now obligated to use original and recent photos/images in their campaigns, and not to use artificial intelligence to create that do not correspond to reality, whether to appear younger, more attractive, more humorous, or otherwise significantly different from the actual conditions. The use of original and recent images/photos is a crucial requirement for election participants to ensure a fair and democratic competition. This is crucial because election participants are prospective representatives who will represent the people's interests in the governance of the country, and therefore must represent their true selves.<sup>50</sup> Furthermore,

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<sup>48</sup> General Election Law No. 7 of 2017 Article (1) Number 27.

<sup>49</sup> Constitutional Court Decision Number 166/PUU-XXI/2023, *Operative Part of the Decision*, page 134.

<sup>50</sup> Viktor Valgarðsson et al., "The Good Politician: Competence, Integrity and Authenticity in Seven Democracies," *Political Studies* 73, no. 2 (2025): 631–56, <https://doi.org/10.1177/00323217241261180>.

as prospective representatives, election participants should support the implementation of good democracy, one of which is by providing enlightened understanding.<sup>51</sup> The Constitutional Court's decision provides a means for election participants to support the achievement of good democracy by conveying information and presenting a self-image that is in accordance with their actual conditions to provide enlightened understanding to the public. Thus, the Constitutional Court's decision has reaffirmed the quality of democracy.

In line with the principles of honest and fair elections, the Constitutional Court's decision reaffirmed that elections must be conducted based on honesty, including the use of photos/images of candidates in constructing their personal image. This affirmation places honesty among election participants as a fundamental ethical principle that must be upheld. Consequently, election participants must present their image to the public with greater transparency.<sup>52</sup>

In the context of the 2024 presidential election, the Prabowo-Gibran campaign strategy, previously extensively used as a primary strategy, is no longer relevant. If the Prabowo-Gibran campaign methods and materials used to construct their personal image using excessive AI manipulation were to be used in the next presidential election, such practices could be challenged under this decision. Consequently, political parties or coalitions of political parties, as well as presidential and vice-presidential candidates in the next presidential election, are prohibited from using excessively AI-manipulated photos/images that significantly differ from the originals for use in campaign materials.

Conversely, in the context of AI use, future candidates should be encouraged to adopt campaign strategy that do not rely on AI-generated image to construct personal image. Instead, greater emphasis can be placed on direct public engagement, including participation in presidential debates and other substantive forums. This is highly relevant to the Constitutional Court's, which prohibits the excessive use of AI to manipulate photos/images in order to create false personal images.

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<sup>51</sup> *Ibid.*

<sup>52</sup> Aryo Putranto Saptohutomo, "Mengapa MK Putuskan Foto Kampanye Dilarang Diubah dengan AI?", 2025, accessed at 8 December 2025 on <https://nasional.kompas.com/read/2025/01/02/15085071/mengapa-mk-putuskan-foto-kampanye-dilarang-diubah-dengan-ai>

From the perspective of campaign theory, the Constitutional Court's decision encourages an improvement in the orientation of election campaign in Indonesia. Campaigns are no longer merely aimed at adjusting personal image to public preferences, but rather emphasize visions, missions, and work programs, and project a self-image that aligns with reality. Therefore, all election participants, whether political parties or coalitions, independent candidates, or presidential and vice-presidential pairs, are required to conduct campaigns that present original and recent photos/images that are not excessively manipulated by AI. In This way, campaigns are carried out with accurate information and restoring their original function as a means of political education for the public in the election process.

This approach is also consistent with digital constitutionalism theory, as the Constitutional Court's decision continues to allow election participants to use AI technology, but within limits, by prohibiting excessive manipulation of photos or images to construct personal image. Such limitations give rise to an obligation for election participants not to deceive or mislead voters through false personal images.

Thus, the implication of Constitutional Court Decision Number 166/PUU-XXI/2023 for election participants is the prohibition on excessive use of AI-manipulated photos/images to construct personal image, thus necessitating the restructuring of campaign methods and materials to comply with the principles of honest and fair elections, provide enlightened understanding, restore the function of campaigns as a means of political education, and ensure that the use of technology remains aligned with constitutional values.

The Constitutional Court's decision also has a significant impact on voters because it directly affects the quality of information that forms the basis for public decision-making in elections. According to democratic theory, particularly referring to Robert A. Dahl's criteria for good democracy, which is gaining enlightened understanding, democracy can only function well if the public has enlightened understanding of the election participants they will choose.<sup>53</sup> Furthermore, Indonesia adheres to representative democracy, in which elected election participants will represent the interests of the

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<sup>53</sup> M Reza Saputra and Nabila Hilyatunisa, *Loc.Cit.*

people in the administration of the state.<sup>54</sup> The public needs to clearly understand the election participants to be able to choose candidates who truly represent the people's interests.<sup>55</sup> The presence of excessive AI-generated photos/images manipulation to shape personal image may prevent voters from accurately understanding the character and conditions of candidates. Therefore, the Constitutional Court's decision provides direct protection for voters' right to obtain correct information, ensuring that electoral choices are not based on misleading perceptions. Therefore, the Constitutional Court's decision now has implications for greater opportunities for voters to assess candidates objectively, namely by examining the true self-image of election participants.

Within the framework of election theory, the Constitutional Court's decision strengthens electoral integrity and ensures voters can exercise their voting rights in democratically conducted elections. The Constitutional Court's decision also restores the original educational function of campaigns for voters. By prohibiting excessive AI manipulation of photos/images, voters will engage more with the substance of candidates' visions, missions, and programs, as well as their self-images that reflect their actual conditions. This situation provides voters with the opportunity to objectively assess and evaluate candidates with the availability of factual information.

From the digital constitutionalism perspective, the Constitutional Court's decision prohibiting the excessive use of AI-manipulated photos/images serves as a protective mechanism against the misuse of technology that may harm voters' right. The Constitutional Court's decision ensures that the people, as voters, continue to receive accurate information in the digital era. This way, voters are no longer dependent on candidate personal image that are in fact contradictory to their actual situation and merely the result of AI manipulation. This is an evaluation of the 2024 presidential election, where decision-making was based solely on AI-manipulated personal image.<sup>56</sup> The Constitutional Court's decision ensures that in the next presidential election elections, voters will no longer be

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<sup>54</sup> Viktor Valgarðsson et al., *Loc. Cit.*

<sup>55</sup> *Ibid.*

<sup>56</sup> Voa Indonesia, "Gemoy 'Everywhere': Disrupsi AI Jadi Ujian dalam Pemilu 2024", 2024, accessed at 8 December 2025 on <https://www.voaindonesia.com/a/gemoy-everywhere-disrupsi-ai-jadi-ujian-dalam-pemilu-2024/7479185.html>

trapped by AI-manipulated personal image. Instead, the decision directs voters to make electoral choices based on accurate and objective information in future elections.<sup>57</sup>

Furthermore, the Constitutional Court's decision also has significant implications for election management bodies. Based on Article 1 Number 7 of the General Election Law, election management bodies consist of the General Election Commission (KPU), the Election Supervisory Body (Bawaslu), and the Election Organizers Ethics Council (DKPP). The Constitutional Court's decision, which affirms the prohibition on the excessive use of AI to manipulate photos/images during the campaign activities, brings changes to the mechanisms of election mechanism. Election management bodies themselves play a crucial role in the electoral process.<sup>58</sup> From the perspective of election theory, election management bodies constitute one of the essential elements of elections. They are required to carry out their duties and responsibilities in a professional, independent, and impartial in order to achieve elections that are fair and possess integrity.<sup>59</sup> Accordingly, election management bodies are required to adjust their duties and responsibilities in responding to new risks arising from developments in digital technology.

Based on Article 12 letter c of the General Election Law, KPU is tasked with formulating KPU regulations for each stage of the electoral process.<sup>60</sup> The issuance of the Constitutional Court's decision prohibiting the excessive use of AI-manipulated photos/images has implications for the KPU to formulate specific regulations at the campaign stage concerning the use of AI. Furthermore, letter d stipulates that the KPU is responsible for coordinating, organizing, controlling, and supervising all stages of the election.<sup>61</sup> The implementation of these duties is intended to ensure that elections are conducted in accordance with the principles of honesty and fairness. This means that the Constitutional Court's decision imposes a new obligation on KPU to ensure that the entire campaign process is conducted honestly and based on accurate

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<sup>57</sup> Aryo Putranto Saptohutomo, "Mengapa MK Putuskan Foto Kampanye Dilarang Diubah dengan AI?", 2025, accessed at 8 December 2025 on <https://nasional.kompas.com/read/2025/01/02/15085071/mengapa-mk-putuskan-foto-kampanye-dilarang-diubah-dengan-ai>

<sup>58</sup> Silvi Fitri Ayu, Poetika Puspasari, *Loc. Cit.*

<sup>59</sup> Mohammad Syaiful Aris, *Loc. Cit.*

<sup>60</sup> General Elections Law Number 7 of 2017 Article (12) Letter c

<sup>61</sup> *Ibid*, Article (12) Letter d

information. KPU must ensure that, throughout the campaign period, no election participant uses AI to excessively manipulate photos/images in a manner that creates false personal images. The KPU must also establish additional oversight mechanisms for campaign materials, particularly photos/images of election participants that have the potential to mislead voters.

Similar implications also apply to Bawaslu as the institution specifically responsible for supervising the conduct of elections. Bawaslu is tasked with ensuring that elections are conducted honestly, fairly, and freely.<sup>62</sup> Based on Article 16 paragraph (4) of Bawaslu Regulation Number 11 of 2023 on the Supervision of General Election Campaigns, Bawaslu also supervises the presentation of the personal image of election participants.<sup>63</sup> In this context, personal image includes serial numbers and photos/images of election participants.<sup>64</sup> Accordingly, the Constitutional Court's decision encourages Bawaslu to expand the scope of its supervisory objects to include personal images constructed through AI-generated photos/images. Bawaslu must ensure that election participants do not use photos/images that have been excessively manipulated using AI to construct their personal image. To maximize supervision of AI usage, Bawaslu needs to develop reporting mechanisms and procedures for handling reports related to violations involving the excessive use of AI to manipulate photos/images during campaign activities. In addition, election participants who continue to use AI excessively to manipulate photos/images in constructing personal image will be subject to sanctions. Therefore, Bawaslu also needs to establish sanctioning mechanisms for such violations, whether in the form of administrative sanctions or sanctions involving the removal or dismantling of campaign props.

Bawaslu also needs to establish collaboration with digital platforms to supervise campaign activities on social media. This is important because Bawaslu must expand its reach in monitoring the electoral process. One of the most widely used and effective methods of spreading campaign materials during campaigns is through social

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<sup>62</sup> Silvi Fitri Ayu, Poetika Puspasari, *Loc. Cit*

<sup>63</sup> Regulation of the Election Supervisory Body (Bawaslu) Number 11 of 2023 concerning the Supervision of General Election Campaigns Article (16) paragraph 4

<sup>64</sup> *Ibid*, Article (5)

media, which can reach a broad segment of the public.<sup>65</sup> Through such collaboration, Bawaslu can prevent campaign activities on social media that use AI to excessively manipulate photos/images and can enhance Bawaslu's supervision of election participants throughout the campaign period.

Meanwhile, the DKPP, as the institution responsible for enforcing the ethical code of election management bodies, also faces important consequences from the Constitutional Court's decision. The DKPP plays a role in ensuring that the KPU and Bawaslu carry out their duties professionally and with integrity, particularly in the context of implementing the prohibition on excessive AI usage. The DKPP must ensure that both the KPU and Bawaslu genuinely enforce and implement the prohibition on the excessive use of AI to manipulate photos or images by election participants. The DKPP must also ensure that any actions taken by the KPU and Bawaslu in supervising, controlling, or responding to violations related to AI usage do not violate the principles of neutrality, transparency, and fairness. If the KPU or Bawaslu fails to properly carry out its obligations regarding AI usage in campaigns and such failure results in the disruption of the integrity of campaign information, the DKPP may assess and determine that an ethical violation has occurred.

Overall, the Constitutional Court's decision has significant impacts on election management bodies by requiring updates and expansions in regulation, supervision, and the enforcement of ethical standards in addressing the use of AI during the campaign process. In this way, the three institutions are able to safeguard electoral integrity by ensuring that election participants comply with the prohibition on the excessive use of AI to manipulate photos/images during campaign activities.

## Conclusion

Based on the results of the analysis conducted, this study concludes that, when examined through the lenses of democratic theory, electoral and campaign theory, and digital constitutionalism theory, the prohibition on the excessive use of Artificial Intelligence (AI) to manipulate photos/images of election participants, along with the obligation to use original and recent photos/images in

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<sup>65</sup> Jayus et al., "Media Sosial Sebagai Media Kampanye Politik Menjelang Pemilu 2024," *JURNAL SIMBOLIKA Research and Learning in Communication Study* 10, no. 1 (2024): 72–81, <https://doi.org/10.31289/simbolika.v10i1.11468>.

constructing political personal image, is capable of ensuring the fulfilment of voters' rights to obtain accurate information. accordingly, such conditions demonstrate the urgent necessity of limiting the use of AI in the implementation of presidential and vice-presidential election campaigns. Constitutional Court's Decision Number 166/PUU-XXI/2023 also carries significant legal implications for various stakeholders. For Lawmakers, this decision necessitates revisions to the General Election Law as well as harmonization with related legislation, particularly to clarify the meaning and limits of "excessive manipulation" in the use of AI during campaigns. For election participant, the decision reinforces the prohibition on using AI to excessively manipulate photos/images in shaping political personal image, as a manifestation of the principle of honest elections. For voters, the decision provides protection of the right to obtain accurate and non-misleading information. Meanwhile, for election management bodies, the decision imposes an obligation to ensure that election participants comply with the prohibition of the use of AI throughout the campaign period.

Based on these findings, the authors offer several recommendations as follows. First, lawmakers, the General Election Law Number 7 of 2017 requires immediate revision to align with Constitutional Court Decision Number 166/PUU-XXI/2023, particularly by clearly regulating the obligation to use original and up-to-date photos/images, prohibiting the excessive use of AI, and establishing clear limitations on AI usage to ensure legal certainty. Lawmakers should also require clear labeling or disclosure of campaign content created or modified using AI and should be placed at the center of the image with permanent watermark. For election participants are advised to use original and recent photos/images and to limit the use of AI solely to technical quality improvements without significantly altering physical appearance, while prioritizing participatory and informative campaign strategies. And for voters are encouraged to remain critical and selective in assessing campaign information. Lastly, for election management bodies are advised to strengthen technical regulations and oversight mechanisms to ensure effective enforcement of the prohibition on excessive AI use during campaign periods.

## References

- Abreu Duarte, Francisco de, Giovanni De Gregorio, and Angelo Jr Golia. "Perspectives on Digital Constitutionalism." *Research Handbook on Law and Technology*, 2023, 315–29. <https://doi.org/10.4337/9781803921327.00028>.
- Adriani Henny. "Partisipasi Bermakna Sebagai Wujud Asas Keterbukaan Dalam Pemb." *UNES Journal of Swara Justisia* 7, no. 1 (2023): 306–18. <https://creativecommons.org/licenses/by/4.0/>.
- Agus Priatna, "Foto: Melihat Baliho Politik Prabowo-Gibran Hasil Teknologi AI", 2023, accessed at 8 December 2025 on <https://www.inilah.com/foto-melihat-baliho-politik-prabowo-gibran-hasil-teknologi-ai>
- Al-Fatih, Sholahuddin. *Perkembangan Metode Penelitian Hukum Di Indonesia*. Pertama. Malang: Universitas Muhammadiyah Malang, 2023.
- Amelia Azis, Rizka, Wasis Susetio, Nurhayani, and Elok Hikmawati. "Pengaturan Dan Pertanggung Jawaban Pemanfaatan Artificial Intelligence (Ai) Di Indonesia Dalam Perspektif Hukum." *Forum Ilmiah* 20, no. 4 (2023): 243–54. <https://www.bing.com/ck/a?!&&p=8ed41b3ddf88be700ac2eb2e756260f70465ed224ac7bad1ff988f3207c542f1JmltdHM9MTczOTkyMzIwMA&ptn=3&ver=2&hsh=4&fclid=21ac1bf1-8aac-684d-0fca-0a0a8b9469d3&psq=jurnal+hukum+tentang+penciptaan+game+ai&u=a1aHR0cHM6Ly9lanVybmlsLmVzYXVu>
- Arifin, Moh. Samsul. "Artificial Intelligence (Ai) Dan Politik: Analisis Terhadap Peran Dan Signifikansi Ai Dalam Komunikasi Politik 2024 Di Indonesia." *Hudan Lin Naas: Jurnal Ilmu Sosial Dan Humaniora* 6, no. 1 (2025): 47. <https://doi.org/10.28944/hudanlinnaas.v6i1.1860>.
- Aris, Mohammad Syaiful. "Penataan Sistem Pemilihan Umum Yang Berkeadilan Untuk Penguatan Sistem Presidensiil Di Indonesia." *Yuridika* 33, no. 2 (2018): 290. <https://doi.org/10.20473/ydk.v33i2.7379>.
- Armandhani, Muhamad Ibnu. "The Spread of Democracy in China." *Journal Of Global Strategic Studies* 4, no. 2 (2024): 146–71. <https://doi.org/10.36859/jgss.v4i2.2602>.
- Aryo Putranto Saptohutomo, "Mengapa MK Putuskan Foto Kampanye Dilarang Diubah dengan AI?", 2025, accessed at 8

- Desember 2025 on <https://nasional.kompas.com/read/2025/01/02/15085071/mengapa-mk-putusan-foto-kampanye-dilarang-diubah-dengan-ai>
- Ayu, Silvi Fitri, and Poetika Puspasari. "Masa Depan Demokrasi Indonesia : Penggunaan Artificial Intelligence ( Ai ) Untuk Pemilu Yang Aman Dan Berintegritas the Future of Democracy in Indonesia : The Use of Artificial Intelligence ( Ai ) for Safe and Integrity" 50, no. 1 (2024): 109-27. <https://doi.org/10.55981/jmi.2024.8696>.
- Bahri, Putri Rizkika, H. M. Galang Asmara, and Muh. Risnain. "Artificial Intelligence (AI)-Based Campaign in the Implementation of General Elections." *RESEARCH REVIEW International Journal of Multidisciplinary* 9, no. 2 (2024): 117-27. <https://doi.org/10.31305/rrijm.2024.v09.n02.012>.
- Bukhori, Nuri Shabrina, Irwansyah. "Framing Pemberitaan Etika Dan Regulasi Penggunaan Foto Artificial Intelligence (AI) Pada Kampanye." *Komuniti: Jurnal Komunikasi Dan Teknologi Informasi* 17, no. 2 (2025): 384-407. <https://doi.org/10.23917/komuniti.v17i2.11236>.
- CNN Indonesia, "MK Resmi Larang Penggunaan Foto AI di Kampanye Pilpres & Pemilu", 2025, accessed at 06 October 2025 on <https://www.cnnindonesia.com/nasional/20250102141800-12-1183130/mk-resmi-larang-penggunaan-foto-ai-di-kampanye-pilpres-pemilu>
- Constitutional Court Decision Number 166/PUU-XXI/2023
- DFRLab and NetLab UFRJ, "Regulating the use of AI for Brazilian elections: what's at stake", 2024, accessed at 13 November 2025 pada <https://netlab.eco.ufrj.br/en/post/regulating-the-use-of-ai-for-brazilian-elections-what-s-at-stake>
- Fatimah, Siti. "Transformasi Ruang Publik Digital : Tantangan Sosial Dan Konstitusional Dalam Demokrasi Era Media Baru." *Cakrawala: Jurnal Litbang Kebijakan* 19, no. 1 (2024): 67-86. <https://doi.org/10.32781/%0Acakrawala.v19i1.785>.
- Haeril, Fachmi Khadam. "Desain Makna Visual Citra Politik Berbasis Ai : Kajian Hermeneutika Fenomena ' Gemoy .'" *ARTIKA: Jurnal Fakultas Desain* Vol.9, no. No.2 (2025): 163-75. <https://doi.org/10.34148/artika.v9i2.1354>.
- Hafiz Noer, "Penggunaan AI semakin masif, tetapi tidak banyak mengubah lanskap kampanye politik di Indonesia", 2024, accessed at 04

- October 2025 on <https://theconversation.com/penggunaan-ai-semakin-masif-tetapi-tidak-banyak-mengubah-lanskap-kampanye-politik-di-indonesia-229617>
- Jayus, Sumaiyah, Desy Mairita, and Assyari Abdullah. "Media Sosial Sebagai Media Kampanye Politik Menjelang Pemilu 2024." *JURNAL SIMBOLIKA Research and Learning in Communication Study* 10, no. 1 (2024): 72-81. <https://doi.org/10.31289/symbolika.v10i1.11468>.
- Kompas.com, "AI dalam Pemilu 2024: Kampanye Modern hingga Susunan Regulasi Baru", 2024, accessed at 05 October 2025 on <https://www.kompas.com/tren/read/2024/02/28/104740565/ai-dalam-pemilu-2024-kampanye-modern-hingga-susunan-regulasi-baru>
- KPU Kabupaten Jayawijaya, "UU Pemilu 2026, Menuju Reformasi Demokrasi Indonesia di Pemilu 2026", 2025, accessed at 3 Januari 2026 on [https://kab-jayawijaya.kpu.go.id/blog/read/7929\\_uu-pemilu-2026-menuju-reformasi-demokrasi-indonesia-di-pemilu-2029](https://kab-jayawijaya.kpu.go.id/blog/read/7929_uu-pemilu-2026-menuju-reformasi-demokrasi-indonesia-di-pemilu-2029)
- Law Number 1 of 2015 on the Enactment of Government Regulation in Lieu of Law Number 1 of 2014 concerning the Election of Governors, Regents, and Mayors into Law
- Law Number 7 of 2017 on General Elections.
- Maulana, Muhammad Luthfi, Budi Harjono, Uin Kh Abdurrahman, and Wahid Pekalongan. "Politik Dan Ai: Gaya Komunikasi Kampanye Politik Capres Prabowo-Gibran." *Jurnal Komunikasi Dan Media* 04, no. 02 (2024): 159-69.
- Muhaemin, Muhammad. "Penggunaan Gambar Artificial Intelligence (AI) Dalam Kampanye Pemilihan Gubernur: Analisis Diskursus Visual." *Jurnal Imajinasi* 8, no. 2 (2024): 180-89. <https://doi.org/10.36859/prinsip.v1i1.2935>.
- Muhammad Khaidir Kahfi Natsir, and Magdhalena Tasik Todingrara. "Konstitusionalisme Digital: Membangun Kerangka Hukum Untuk Tata Kelola Penyelenggaraan Negara Di Era Teknologi." *Terang : Jurnal Kajian Ilmu Sosial, Politik Dan Hukum* 2, no. 3 (2025): 51-60. <https://doi.org/10.62383/terang.v2i3.1286>.
- Nirmala Maulana Achmad, Dani Prabowo, "Jubir TKN Prabowo-Gibran: Narasi "Gemoy" Untuk Bikin Milenial dan Gen Z Melirik", 2023, accessed at 04 December 2025 on <https://nasional.kompas.com/read/2023/11/29/23212531/jubir-tnk-prabowo-gibran-narasi-gemoy-catchy-untuk-bikin->

milenial-dan-gen-

Nivell Rayda, "Indonesia Election 2024: How AI Has Become a Double-Edged Sword for Candidates and Election Officials", 2024, accessed at 8 December 2025 on <https://www.channelnewsasia.com/asia/ai-disinformation-deepfakes-indonesia-elections-4091296>

Regulation of the General Election Supervisory Agency (Bawaslu) Number 11 of 2023 concerning the Supervision of General Election Campaigns

Samatan, Nuriyati, and Marwan Londol. "The Use of Artificial Intelligence ( AI ) Technology and Visual Design of Campaign Billboards on The Decision to Vote For Presidential Candidates in Generation Z." *IJAM: International Journal of Advanced Multidisciplinary* 3, no. 4 (2025): 542-57.

Santoso, Joseph Teguh. *Kecerdasan Buatan (Artificial Intelligence)*. Semarang: Yayasan Prima Agus Teknik & Universitas Stekom, 2023.

Saputra, M Reza, and Nabila Hilyatunisa. "Redefining Executive Power : Evolution of Presidential and Vice Presidential Roles in Indonesia ' s Post -Amendment Constitutional System." *LITERACY: International Scientific Journals of Social , Education , Humanities* vol 4, no. 2 (2025): 440-51. <https://doi.org/10.56910/literacy.v4i2.2697>.

Sheikh, Haroon, Corien Prins, and Erik Schrijvers. "Artificial Intelligence: Definition and Background." In *Mission AI: Research for Policy*, 15-41. Den Haag: Springer Cham, 2023. <https://doi.org/https://doi.org/10.1007/978-3-031-21448-6>.

Slamet, Mohamad, Dadan Kurnia, Dahly Sukmapryandhika, ) Program, Studi Magister, Ilmu Pemerintahan, and Fisip Unjani. "Sinergitas Pemprov Dki Jakarta Dan Satkowil Dalam Mencegah Konflik Sosial Menjelang Masa Pemilu Serentak Tahun 2024." *Jurnal Prinsip Volume* 1, no. 1 (2024): 288-303. <https://ejournal.fisip.unjani.ac.id/index.php/prinsip>.

The National Conference of State Legislatures, "AI in Elections: A Look at the Federal and State Legislative Landscape", 2024, accessed at 13 November 2025 pada <https://www.ncsl.org/elections-and-campaigns/ai-in-elections-a-look-at-the-federal-and-state-legislative-landscape>

The Straits Times, "Generative AI Faces Major Test as Indonesia Hold Largest Election Since Boom in Its Use", 2024, accessed at 04

- Desember 2025 pada <https://www.straitstimes.com/asia/generative-ai-faces-major-test-as-indonesia-holds-largest-election-since-boom>
- Valgarðsson, Viktor, Will Jennings, Gerry Stoker, Lawrence McKay, Daniel Devine, and Nick Clarke. "The Good Politician: Competence, Integrity and Authenticity in Seven Democracies." *Political Studies* 73, no. 2 (2025): 631-56. <https://doi.org/10.1177/00323217241261180>.
- Voa Indonesia, "Gemoy 'Everywhere': Disrupsi AI Jadi Ujian dalam Pemilu 2024", 2024, accessed at 8 Desember 2025 pada <https://www.voaindonesia.com/a/gemoy-everywhere-disrupsi-ai-jadi-ujian-dalam-pemilu-2024/7479185.html>
- Wahid, Deny Noer, and Ilham Dwi Rafiqi. Manifestation of Eastern Cultural Values by Re-arranging Norm on Insulting the President and Vice President. *Hang Tuah Law Journal* 6, no. 1, (2022): 61-76. <https://doi.org/10.30649/htlj.v6i1.76>.
- Willa Wahyuni, "MK Larang Peserta Pemilu Gunakan Foto AI Saat Kampanye", 2025, accessed at 07 Oktober 2025 on [https://www.hukumonline.com/berita/a/mk-larang-peserta-pemilu-gunakan-foto-ai-saat-kampanye-lt67769185b1241/?utm\\_source=copy&utm\\_medium=berita&utm\\_campaign=shared\\_sosmed](https://www.hukumonline.com/berita/a/mk-larang-peserta-pemilu-gunakan-foto-ai-saat-kampanye-lt67769185b1241/?utm_source=copy&utm_medium=berita&utm_campaign=shared_sosmed)

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