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# AI-GENERATED CONTENT, DEEPFAKES, AND MEMES: INTELLECTUAL PROPERTY CHALLENGES IN THE INTERNET AGE

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**Abstract**

Artificial Intelligence (AI) has transformed the traditional notions of creativity, originality, and authorship that form the foundation of intellectual property law. From AI-generated artworks and deepfake videos to viral memes, the digital age has blurred the distinction between human and machine creativity. This paper examines the emerging legal and ethical challenges that arise at the intersection of AI-generated content and intellectual property rights (IPR). It explores whether works produced by AI systems qualify for copyright protection, how deepfakes infringe personality and moral rights, and to what extent memes fall within the boundaries of fair use and parody exceptions. Drawing upon Indian and international legal frameworks, this study critically analyses how the Copyright Act, 1957, the Information Technology Act, 2000, and corresponding international instruments such as the Berne Convention and TRIPS Agreement respond to these evolving challenges. The paper concludes with recommendations for reform, emphasizing the need for a dynamic legal approach that balances innovation with protection.

**Keywords -** Artificial Intelligence, Intellectual Property Rights, Copyright, Deepfakes, Memes, Fair Use, Authorship, AI Creativity, Information Technology Act, Moral Rights

## Introduction

The emergence of Artificial Intelligence marks a defining moment in human innovation, blurring the boundary between machine computation and creative expression. With algorithms now capable of generating poetry, composing symphonies, designing logos, and even writing legal judgments, questions of authorship and ownership have gained renewed urgency. In the context of intellectual property law, this technological shift has forced legal systems to confront one fundamental dilemma: Can a machine be considered an author or inventor?

The digital environment has also given rise to phenomena like deepfakes which includes synthetic videos that superimpose one individual's likeness onto another's body and memes, humorous digital images that remix existing copyrighted works. While both serve as cultural symbols of the internet age, they often challenge the limits of copyright and personality rights.

The purpose of this research is to explore the intersection between AI-generated creativity and the law of intellectual property, particularly within the Indian legal framework. By examining statutory provisions, case law, and global trends, this paper aims to highlight the inadequacy of existing laws in dealing with non-human creators and algorithmic innovation.

## II. Theoretical Framework of Intellectual Property and Artificial Intelligence

Intellectual property law rests upon the principles of originality, authorship, and

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ownership. These principles presuppose human creativity as the foundation of protectable work. The Copyright Act, 1957, under Section 2(d), defines an "author" as the person who creates the work. Similarly, Section 13 extends copyright protection to original literary, dramatic, musical, and artistic works.[1023]

However, AI-generated works challenge this definition by raising doubts about whether a non-human agent can create "original" content without human intervention. The World Intellectual Property Organization (WIPO) recognizes this dilemma as one of the most critical frontiers in global copyright law.[1024]

AI models such as ChatGPT, Midjourney, and DALL·E generate outputs based on vast datasets and algorithms rather than individual creativity. Consequently, determining authorship becomes ambiguous: should ownership belong to the AI developer, the user who provides prompts, or should the work remain in the public domain?

Courts across jurisdictions have attempted to answer this question. In the landmark U.K. case *Thaler v. Comptroller-General of Patents, Designs and Trade Marks (2021)*[1025], the applicant sought to designate an AI system named DABUS as the inventor of two patents. The court, however, held that only a natural person could be recognized as an inventor under existing law. Similarly, the U.S. Copyright Office has repeatedly denied copyright registration for works "produced by a machine without human authorship."

In India, no explicit precedent exists yet. However, the Copyright Office of India in its 2020 circular emphasized that "human authorship" is an essential criterion for copyright subsistence[1026]. Thus, even though AI tools are extensively used in media, film, and literature, their outputs currently fall outside the domain of legal protection unless there is identifiable human contribution.

### III. AI-Generated Content and the Concept of Authorship in Copyright Law

The challenge of authorship in AI-generated works goes beyond mere ownership as it questions the philosophical essence of creativity itself. Copyright law, both in India and internationally, has historically relied upon the "sweat of the brow" and "modicum of creativity" doctrines to determine originality. However, AI challenges both, as algorithms do not possess consciousness, creativity, or moral intent.

### A. Originality and Human Authorship: Indian Jurisprudence

The Indian legal position on originality was clearly articulated by the Supreme Court in *Eastern Book Company v. D.B. Modak (2008)*[1027]. The Court rejected the traditional "sweat of the brow" doctrine, holding that copyright protection requires a "minimum degree of creativity." The case dealt with whether edited versions of Supreme Court judgments published by Eastern Book Company could attract copyright protection. The Court held that only those parts reflecting human skill and judgment such as headnotes and editorial inputs are qualified for protection.

Applying this principle to AI, one may argue that the algorithm itself does not exercise "skill and judgment"; rather, it operates through pre-set programming and statistical prediction. Therefore, unless a human author exerts creative control over the output, the work cannot be considered "original" within the meaning of Section 13 of the Copyright Act, 1957.[1028]

The Delhi High Court in *Super Cassettes Industries Ltd. v. Hamar Television Network Pvt. Ltd. (2012)*[1029] also reiterated the importance of creative input, holding that copyright subsists only when there is independent application of

[1023] Copyright Act, 1957, Section2(d), Section13.
[1024] WIPO, Revised Issues Paper on Intellectual Property Policy and Artificial Intelligence, 2020.
[1025] Thaler v. Comptroller-General of Patents, Designs and Trade Marks [2021] EWCA Civ 1374.
[1026] Copyright Office of India, Circular No. 05/2020, "Registration of Works Generated Using Artificial Intelligence
[1027] Eastern Book Company v. D.B. Modak, (2008) 1 SCC 1
[1028] Copyright Act, 1957, Section 13
[1029] Super Cassettes Industries Ltd. v. Hamar Television Network Pvt. Ltd., 2012 SCC OnLine Del 2647

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mind in producing the work. Thus, in an AI context, identifying whose "mind" applies - the programmer's, the user's, or the AI's is central to determining authorship.

**B. The Role of the User and Developer**

A major question is whether the individual who prompts or trains the AI system qualifies as the author. If the user merely types a command such as "create a landscape painting," the contribution is minimal. However, if the user sets detailed parameters, adjusts weights, or curates the dataset, that human input may amount to authorship.

The UK Copyright, Designs and Patents Act 1988, in Section 9(3), offers an interesting approach. It provides that, in the case of computer-generated works, the author is "the person by whom the arrangements necessary for the creation of the work are undertaken."[1030] Although this provision pre-dates modern AI, it allows recognition of a human who orchestrates the creative process.

India, however, lacks such a specific statutory provision. Consequently, AI-generated outputs, without human intervention, risk falling into the public domain, depriving developers and users of exclusive rights. This legal uncertainty could disincentivize innovation in creative AI industries.

**C. Comparative Perspective: The U.S. and E.U. Approach**

In the United States, the U.S. Copyright Office has consistently maintained that works "produced by a machine or mere mechanical process that operates randomly or automatically without any creative input or intervention from a human author" are not eligible for protection[1031]. The landmark "Monkey Selfie" case, *Naruto v. Slater (2018)*[1032], though not about AI, provides an analogy: the Ninth Circuit held that a non-human (in this case, a monkey) could not claim copyright because only humans can be "authors" under the Copyright Act of 1976.

The European Union, through instruments like the EU Copyright Directive (2019/790), recognizes authorship only for natural persons but is exploring reform options to address AI-generated works. The European Parliament's 2020 resolution on "Intellectual Property Rights for the Development of Artificial Intelligence Technologies" recommended that while AI cannot own rights, the legal system should ensure that human stakeholders receive fair attribution.[1033]

In sum, while the Western world moves toward balancing innovation with protection, India is yet to adopt a formal policy addressing AI creativity, leaving ambiguity under the Copyright Act, 1957.

**IV. Deepfakes, Memes, and Personality Rights in the Age of AI**

Artificial Intelligence has enabled not only creative innovation but also misuse of digital tools for deception and exploitation. The rise of deepfakes like AI-generated synthetic media where a person's likeness is manipulated has raised serious concerns regarding privacy, defamation, and moral rights. Similarly, memes, though usually humorous and transformative, blur the line between parody and infringement. Both phenomena challenge the existing frameworks of copyright and personality rights in unprecedented ways.

**A. Deepfakes: Between Creativity and Violation**

Deepfake technology employs Generative Adversarial Networks (GANs) to create highly realistic videos or audio clips of individuals appearing to say or do things they never actually did. While initially developed for creative and educational purposes, deepfakes are increasingly used for political misinformation, revenge pornography, and identity manipulation.

[1030] Copyright, Designs and Patents Act, 1988 (U.K.), Section 9(3)
[1031] U.S. Copyright Office, Compendium of U.S. Copyright Office Practices Section313.2 (3d ed. 2021).
[1032] Naruto v. Slater, 888 F.3d 418 (9th Cir. 2018)
[1033] European Parliament Resolution of 20 October 2020, "Intellectual Property Rights for the Development of Artificial Intelligence Technologies," 2020/2015(INI)

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From an intellectual property standpoint, deepfakes may infringe moral rights of individuals under Section 57 of the Copyright Act, 1957, which includes the right to protect one's work from distortion, mutilation, or other modification prejudicial to the author's honour or reputation[1034]. While this provision was originally meant for artistic works, courts have expanded its interpretation to include the personal and reputational dimension of creation.

In *Amarnath Sehgal v. Union of India (2005)*[1035], the Delhi High Court upheld an artist's right to moral integrity when his mural was removed and damaged by government authorities. Applying this principle, if a person's likeness or voice is digitally altered in a way that harms their reputation or dignity, similar moral rights concerns arise even though the "work" here is not traditional art but a digital likeness.

Deepfakes also raise privacy concerns, recognized as a fundamental right in *Justice K.S. Puttaswamy v. Union of India (2017)*[1036]. Unauthorized digital impersonation through AI violates informational privacy and may constitute identity theft under Sections 66C and 66E of the Information Technology Act, 2000.[1037]

Despite these violations, Indian law does not yet provide specific regulation on deepfakes. The Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021 impose a duty on platforms to remove manipulated media within 36 hours of a complaint, but these provisions lack explicit recognition of intellectual property or personality rights violations arising from deepfake content.

**B. Memes and the Doctrine of Fair Use**

Memes, on the other hand, are cultural products that thrive on imitation, humor, and transformation. While many memes remix copyrighted material such as film stills, music, or celebrity photos and they often fall within the ambit of fair dealing or fair use exceptions. Section 52(1)(a) of the Copyright Act, 1957 allows reproduction of a work for private use, criticism, or review, provided it does not conflict with normal exploitation of the work.[1038]

The Delhi High Court's ruling in *Civic Chandran v. Ammini Amma (1996)*[1039] emphasized that parody and criticism can constitute fair dealing if they add new meaning or message rather than merely reproducing the original. Memes, by their very nature, rely on such transformation. However, when memes are used for commercial gain, defamation, or false endorsement, they can violate trademark and publicity rights.

The U.S. case *Campbell v. Acuff-Rose Music, Inc. (1994)*[1040] recognized parody as transformative use protected under fair use, highlighting that humor and commentary can justify limited reproduction. Indian courts have informally echoed this sentiment, though no specific meme-related precedent exists.

In cases where AI-generated memes use celebrity images, the right of publicity comes into play. This right, though not codified in India, has been judicially recognized in *ICC Development (International) Ltd. v. Arvee Enterprises (2003)*[1041], where the Delhi High Court held that unauthorized commercial use of a person's image amounts to misappropriation of personality.

Thus, AI-based meme generation which is especially when using a public figure's likeness can constitute both copyright infringement and violation of publicity rights.

**C. Free Speech and the Internet Paradox**

Balancing intellectual property with freedom of expression remains a challenge. Article 19(1)(a) of the Indian Constitution guarantees the right to free speech, which includes the right to

[1034] Copyright Act, 1957, Section 57
[1035] Amarnath Sehgal v. Union of India, 2005 SCC OnLine Del 1362
[1036] Justice K.S. Puttaswamy v. Union of India, (2017) 10 SCC 1
[1037] Information Technology Act, 2000, Sections 66C, 66E
[1038] Copyright Act, 1957, Section 52(1)(a)
[1039] Civic Chandran v. Ammini Amma, 1996 PTC (16) 329 (Ker)
[1040] Campbell v. Acuff-Rose Music, Inc., 510 U.S. 569 (1994)
[1041] ICC Development (International) Ltd. v. Arvee Enterprises, 2003 SCC OnLine Del 24

express satire or criticism. However, such freedom is subject to reasonable restrictions under Article 19(2), including those related to defamation and decency.

In *Shreya Singhal v. Union of India (2015)*[1042], the Supreme Court struck down Section 66A of the Information Technology Act, 2000 for being vague and unconstitutional, but it also emphasized the need to regulate content that infringes others' rights. This case underlines the delicate balance between creativity and regulation in digital expression.

Memes, deepfakes, and AI-based parody occupy a grey zone which is protected under free speech but potentially violative of copyright and personality rights. As technology evolves, courts must develop context-sensitive approaches that protect expression without enabling misuse.

**Part IV: Comparative Analysis, Legal Challenges, and the Way Forward**

**A. Comparative Overview of Legal Frameworks**

The emergence of Artificial Intelligence (AI) in creative and communicative domains has generated profound global debates about authorship, ownership, and accountability. Nations worldwide have approached the intersection of AI and Intellectual Property (IP) differently, reflecting unique cultural and legal traditions.

1. United States

The United States Copyright Office (USCO) maintains that copyright protection extends only to works of human authorship[1043]. The U.S. case *Naruto v. Slater (2018)*[1044] famously known as the "monkey selfie" case has affirmed that non-human entities cannot hold copyrights.

Similarly, in *Thaler v. Perlmutter (2023)*[1045], the U.S. District Court for the District of Columbia held that artworks created autonomously by AI (in this case, "Creativity Machine") lacked human authorship and were therefore not copyrightable.

However, the U.S. has adapted its fair use doctrine to include transformative uses such as remix, parody, and AI-assisted works, giving creators more leeway while balancing original rights. The four-factor test under 17 U.S.C. Section 107 remains central in determining whether AI outputs constitute infringement or transformation.

2. European Union

The European Union (EU) has taken a cautious and rights-centric approach. The EU Copyright Directive (2019/790) introduced exceptions for "text and data mining," allowing limited AI use of copyrighted data for research and innovation.[1046] Yet, EU law continues to require human authorship for copyright protection. The EU also emphasizes data protection and personality rights, rooted in Article 8 of the European Convention on Human Rights (ECHR) and the General Data Protection Regulation (GDPR).[1047]

In *Painer v. Standard VerlagsGmbH (2011)*[1048], the Court of Justice of the European Union (CJEU) recognized that even a photograph can reflect the personal touch and intellectual creation of its author. This reinforces the notion that creative autonomy which is something AI lacks and is central to copyright.

3. United Kingdom

The UK Copyright, Designs and Patents Act, 1988 uniquely acknowledges computer-generated works under Section 9(3), stating that "the author shall be taken to be the person by whom the arrangements necessary for the creation of the work are undertaken."[1049] This provision arguably anticipates AI-generated content, granting rights to programmers or operators rather than the AI itself.

[1042] Shreya Singhal v. Union of India, (2015) 5 SCC 1
[1043] United States Copyright Office, Compendium of U.S. Copyright Office Practices (2023)
[1044] Naruto v. Slater, 888 F.3d 418 (9th Cir. 2018)
[1045] Thaler v. Perlmutter, 1:22-cv-01564 (D.D.C. 2023).
[1046] EU Directive 2019/790 on Copyright in the Digital Single Market
[1047] General Data Protection Regulation (GDPR), Regulation (EU) 2016/679
[1048] Painer v. Standard VerlagsGmbH, Case C-145/10 (CJEU, 2011)
[1049] Copyright, Designs and Patents Act, 1988, Section 9(3)

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Cases like *Nova Productions Ltd. v. Mazooma Games Ltd. (2007)*[1050] demonstrate how UK courts emphasize human involvement, holding that the programmer and not the machine was the author of computer-generated animations.

4. India

In contrast, India's Copyright Act, 1957 does not explicitly address AI authorship. Section 2(d)(vi) defines an "author" of a computer-generated work as "the person who causes the work to be created."[1051] While this provision offers flexibility, it still presumes human agency.

The Indian legal system remains cautious, interpreting "causes" to mean intentional human initiation, not autonomous AI output. The Indian Patent Office, in Device for Autonomous Bootstrapping of Unified Sentience (DABUS) application (2020), rejected AI inventorship, aligning with the global consensus that machines cannot be authors or inventors.[1052]

However, as India rapidly digitizes its creative economy, these frameworks must evolve to protect both innovation and ethical boundaries.

**B. Challenges and Ethical Concerns**

The convergence of AI, creativity, and law introduces challenges that transcend traditional legal categories. These issues are not merely technical but ethical, social, and philosophical.

1. Ownership and Accountability

When an AI system autonomously creates music, literature, or visual art, who owns it? Is it the programmer, the data provider, or the machine itself? Current laws fail to provide a uniform answer. The absence of legal personhood for AI complicates ownership and liability for infringement or defamation.

In India, this gap could lead to ambiguity in enforcing remedies, particularly when AI content violates another's copyright or moral rights. The judiciary will have to interpret "authorship" contextually, considering the level of human control and creative input.

2. Violation of Privacy and Reputation

AI-generated deepfakes and synthetic voice cloning threaten individuals' right to privacy and dignity. The Supreme Court of India, in *Justice K.S. Puttaswamy v. Union of India (2017)*[1053], established privacy as an intrinsic right under Article 21. When AI systems reproduce a person's image or voice without consent, they directly violate this constitutional protection.

The misuse of celebrity likenesses for political propaganda or pornographic content further raises questions under Sections 66C and 67 of the Information Technology Act, 2000, highlighting the urgent need for specific AI legislation to address such harms.

3. Plagiarism and Authenticity

AI tools trained on massive datasets can unknowingly replicate existing works, resulting in plagiarism without intent. This undermines the essence of originality, a cornerstone of copyright law. In *Eastern Book Company v. D.B. Modak (2008)*[1054], the Supreme Court held that originality requires "a minimal degree of creativity." AI systems, lacking consciousness, may not meet this threshold unless guided by human direction.

4. Ethical and Societal Implications

AI's capacity to mimic human creativity raises existential questions: Should machines compete with artists and writers? Does automation devalue human expression? The UNESCO Recommendation on the Ethics of Artificial Intelligence (2021) emphasizes human-centric AI development, advocating for transparency, accountability, and cultural preservation.[1055]

[1050] Nova Productions Ltd. v. Mazooma Games Ltd., [2007] EWCA Civ 219

[1051] Copyright Act, 1957, Section 2(d)(vi)

[1052] Device for Autonomous Bootstrapping of Unified Sentience (DABUS), Patent Office Order, 2020

[1053] Justice K.S. Puttaswamy v. Union of India, (2017) 10 SCC 1

[1054] Eastern Book Company v. D.B. Modak, (2008) 1 SCC 1

[1055] UNESCO, Recommendation on the Ethics of Artificial Intelligence (2021).

**C. Reform and Recommendations**

To adapt to this evolving landscape, India needs a multilayered regulatory framework combining IP protection, digital ethics, and technological responsibility.

1. Statutory Recognition of AI-Generated Works:

Amend the Copyright Act, 1957 to define and recognize AI-assisted works, specifying that the person who substantially contributes creative direction (programmer, dataset curator, or operator) should hold authorship.

2. Introduction of "AI Accountability Clause":

A clause assigning legal responsibility for infringement or misuse of AI-generated content, based on control and causation principles.

3. Creation of an AI Ethics Commission:

A regulatory body to oversee the ethical development and deployment of AI in creative industries, ensuring compliance with data privacy and personality rights.

4. Publicity and Personality Rights Legislation:

Codify the right of publicity to prevent unauthorized commercial use of an individual's name, likeness, or digital persona.

5. Mandatory Disclosure Requirements:

Require AI-generated works to include metadata identifying their non-human origin, ensuring transparency in creative markets.

6. Educational and Judicial Capacity-Building:

Equip legal practitioners, judges, and creators with AI literacy to handle emerging disputes involving algorithmic creativity and data use.

**Conclusion**

The intersection of Artificial Intelligence and Intellectual Property Law reveals a paradox: the very technology that empowers creativity also threatens to undermine it. AI challenges traditional notions of authorship, originality, and ownership which is core foundations of copyright and patent law.

In India, while the Copyright Act, 1957 and Information Technology Act, 2000 provide partial coverage, the rapid expansion of generative AI demands proactive legislative reform. As deepfakes, AI art, and synthetic content grow in influence, protecting moral, cultural, and economic rights becomes imperative.

Ultimately, the future of AI and intellectual property lies in balance which is between innovation and accountability, automation and authorship, technology and humanity. Legal systems must evolve not to restrict AI but to channel it toward ethical creativity and equitable benefit.

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