

Introductory Statement

Jury selection is called voir dire and is a process designed to assess a potential juror's qualifications. This questionnaire is a part of the voir dire process and will be used to assist the Court and counsel in selecting a jury to hear this case. The questionnaire and the questions that will be asked in open court are designed to give each of you an opportunity to disclose facts and beliefs that may impact your ability to fairly apply the law to the facts presented. Both sides are entitled to a fair trial by an impartial jury and the Court should know whether there is any prejudice or prejudgment that would prevent you from basing your verdict solely on the law and the evidence presented during trial. A citizen's private opinions and desires may conflict with those obligations, but a jury must be willing to base the verdict solely upon the evidence.

In addition to all the considerations of fairness and objective judgment which the jury is asked to render, this case involves one other sensitive consideration which must be faced. This case involves charges under the federal obscenity laws which will necessarily call into question the jury's conclusions about certain motion picture films depicting explicit sexual acts. Some people may be at ease viewing these films, some may be indifferent, and still others may be uncomfortable or even dread the thought of having to view these films as evidence in an impartial and objective fashion. You will not be asked to approve or disapprove of these films or of such films in general. You will be asked to render a fair, impartial, and objective verdict upon the evidence and the law, nothing more and nothing less. It is normal for there to be a range of reactions and opinions about such things, and that range of experience and views is part of the cross section of the community that jury selection seeks to achieve. Therefore, whether you may now think you would be uncomfortable or comfortable watching these films, such feelings or thoughts alone are not sufficient reasons for you to be excused from, or to qualify for, jury service, nor will the Court qualify you or excuse you from serving as a juror simply because of your preference one way or the other in this

regard.

This does not mean that you may not be asked questions about your preferences and opinions, but your preferences for or against serving and your personal opinions will not alone be cause for qualifying or being excused from being a juror. What is important is that all of you be willing to be truthful in admitting or disclosing such strong preferences for or against the government or the defendant or the subject matter that you could not honestly promise to take an oath to render a fair and impartial verdict in this case. A short summary of each film is provided below:

Count #1 - This movie depicts one or more woman masturbating themselves, masturbating a horse, having intercourse with a horse, and orally copulating a horse.

Count #2 - This movie is another scat film in that it depicts one or more men urinating or defecating on a woman's face or in her mouth. The woman is also seen eating feces and performing oral sex. The woman is also seen drinking semen, urine, and feces.

Count #3 - This movie depicts the defendant Ira Isaacs directing a woman to perform acts, including oral sex, urination, placing what appeared to be feces in her mouth, smearing feces on her face and body, and smearing feces on the male's penis on which the female then performed oral sex.

Count #4 - This movie is what is commonly referred to as a "scat film" in that it depicts sexual activity combined with urination and defecation. The movie contains multiple scenes involving men and women who masturbate and have anal and oral sex. The movie also has multiple scenes in which males defecate or urinate on the women's faces or in their mouths.¹

¹ The defense is of the view that the movie descriptions should be the detailed descriptions included in prior filings with the Court. The government, however, understood that the Court wanted a hybrid description that referred to the types of acts, by category, that each movie included. The parties, therefore, have included the hybrid description in the questionnaire (to which the defendant objects) and the more detailed description (to which the government objects) at the end

of the document as an attachment to allow the Court to choose.

United States v. Ira Isaacs, CR No. 07-732-GHK

Juror Questionnaire

Juror No. _____

Instructions

Please complete the following questionnaire to assist the Court and counsel in selecting a jury to serve in this case. The purpose of these questions is not to ask unnecessarily about personal matters. It is simply to determine whether a perspective juror can decide the case fairly and impartially. This questionnaire will not be made public.

Please do not discuss the questionnaire or your answers with anyone. It is very important that the answers be yours and yours alone. Remember that there are no "right" or "wrong" answers; only truthful answers. You are sworn to give true and complete answers to all questions.

Please print your answers and use ink to insure legibility. Please write your name and assigned juror number on the first page and your juror number on each page thereafter.

JUROR QUESTIONNAIRE

JUROR NAME _____

JUROR NO. _____

1. (a) Do you have any physical problem (for example, with your sight or hearing) that would interfere with your ability to serve?

YES _____ NO _____

(b) If yes, please describe: _____

2. (a) What was your highest level of education?

0-8 grade _____

some high school _____

High school graduate _____

Some college _____

College graduate _____

Some graduate school _____

Post-graduate degree _____

(b) If you are presently a student, please describe briefly your area of study.

(c) Name any degrees you have earned and your major areas of study.

(d) Even if you have never earned a law degree, please describe any law courses you have had (for example, business law courses in college, paralegal programs, etc.)

(e) Have you ever taken any psychology or counseling courses? YES _____ NO _____

If yes, explain

3. What newspapers and magazines do you read regularly?

4. What television news shows do you watch regularly?

5. What are your favorite books and movies?

6. Reports about this case have appeared in the news. Have you seen, heard or read anything about this case? (This includes, not only anything you may have seen or read in the media, but also anything you might have heard from relatives, friends or coworkers.).

YES _____ NO _____

If yes, please indicate where you heard or read about this case by checking all that apply:

TV News _____

Radio News _____

Newspaper _____

Magazines _____

Books _____

Internet _____

On-Line _____

Conversations _____

Overheard others discussing the case _____

7. How would you describe the amount of news coverage you

have seen about this case:

Very much _____

Quite a bit _____

Not much _____

None or Hardly at all _____

8. Describe what you recall reading or hearing about this case:

9. Do you belong to any civic, social, business or professional, fraternal, political or recreational organization? YES _____ NO _____

If yes, please list those to which you belong.

10. Do you have any views or political or religious beliefs that may affect your service as a juror in this case.?

If so, please explain:

11. Do you have any relatives or close friends who are lawyers or who have attended law school?

YES _____ NO _____

If yes, please describe your relationship with the person

and, if you know, the type of law he or she practices (e.g.,
uncle -- real estate law; neighbor -- criminal law).

12. Have you, or any family member or close friend, ever
worked for a criminal defense lawyer or private
investigator? YES _____ NO _____

13. Have you, or any family member or close friend, ever
been employed by any of the following?

(a) Federal, State or County Prosecutors' Offices
YES _____ NO _____

(b) Federal or State Correctional agencies such as a prison,
jail or probation or parole office?
YES _____ NO _____

(c) Any Federal law enforcement or investigative agency
(examples of which are FBI, DEA, BATF, CIA, Customs,
Immigration, Secret Service, Naval Investigative Service,
etc.) YES _____ NO _____

(d) Any state law enforcement agency (examples of which are
local police departments; sheriffs, highway patrol, etc.)
YES _____ NO _____

(e) Public Defender or legal aid organization?
YES _____ NO _____

(f) Law office or law firm? YES _____ NO _____

14. If you answer to any of the above is yes, please
explain which agency/office and describe the employment

15. Are you planning, or (if you know) is anyone in your
family planning to apply for a position with any of
these agencies? YES _____ NO _____

If yes, please describe who is applying, if it is not you, your relationship to that person and the agency

16. Without judging the opinions, views, agenda, effectiveness, or value of any particular organization or group, the Court would like to know whether you have affiliations which relate to the subject matter or this case.

- (a) Are you or have you been a member of or contributor to any group or organization which advocates for more enforcement or strengthening of obscenity laws or that opposes the production or distribution of any form of pornography, including such groups as American Family Association, Athletes and Business Leaders for Kids, Children's Legal Foundation, Christian Legal Society, Christian Medical Society, Citizens Against Pornography, Citizens for Decency through Law, Concerned Citizens for Community Values, Concerned Women of America, Family Research Council, Focus on the Family, Morality in Media, National Center for Protection of Children and Families, National Coalition Against Pornography, National Family Legal Foundation, National Federation for Decency, National Law Center for Children and Families, Religious Alliance Against Pornography, and Women Against Pornography?

If yes, please describe:

- (b) Are you or have you been a member of or a contributor to any group or organization which advocates for less enforcement or repeal of

obscenity laws or that support the production or distribution or any form of pornography, including such groups as Action for Children's Television, Adult Film Association of America, Adult Video Association, American Booksellers Association, American Civil Liberties Union, American Library Association, Anti-Censorship Coalition, Committee for Intellectual Freedom, First Amendment Lawyers Association, Free Speech Coalition and Video Software Dealers Association?

If yes, please describe:

17. Have you ever served:

As a juror in a civil case? YES _____ NO _____

As a grand juror? YES _____ NO _____

As a juror in a criminal case? YES _____ NO _____

If you have sat as a juror in a criminal case, please fill out the following chart:

Type: Civil /Criminal Charges	Nature of Case/	Jury Verdict Reached (Answer Yes or No Only)
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

I, (insert name) _____, declare under penalty of perjury that the answers set forth in the above

Jury Questionnaire are true and correct to the best of my knowledge and belief. I have not discussed my answers with others or received assistance in completing the questionnaire.

Dated: _____

Signature

ADDITIONAL SHEET OF PAPER FOR LENGTHIER EXPLANATIONS

(Note the number of the question and then complete the answer using this paper).

Detailed Movie Descriptions

"Gang Bang Horse Pony Sex Game" - This movie starts in a field with a white female riding a horse while leading a second horse by the reins. The female led the horse back to what appeared to be a stable and tied the horses' reins to the stable. The female began to groom the horses with a brush. While touching and petting the horses the female began to undress. After removing all but her underwear, the female began to masturbate with her hand while petting the horses. In the following scene, the female masturbated with a carrot. After a few minutes of masturbating with the carrot the female broke the carrot and fed it to the horses. The scene focused on the female who masturbated one horse while masturbating herself, then it cut to the female licking the horse's penis. In the next scene, the female was lying on a hay bale under one horse while masturbating herself and the horse. The female then forced the horse's penis inside of her vagina and masturbated the horse. The movie then cut to the female performing oral sex on the horse. The female performed oral sex on the horse until the horse ejaculated in the female's mouth. The female allowed the ejaculate to run out of her mouth and then rubbed it over her body.

In the next scene the female again had the horse vaginally penetrate her with its penis and then performed oral sex on the horse. After performing oral sex the female reinserted the horse's penis in her vagina and masturbated the horse until the horse ejaculated in her vagina and on her body. In the next scene the female is again lying underneath the horse on a bale of hay. The female masturbated the horse until the horse ejaculated on her abdomen and chest, at which time she smeared the ejaculate over her body. The movie ended with the female lying down in a corner of the stable and going to sleep. The words "To Be

Continued" are flashed on the screen. The movie lasted approximately 58 minutes.

"Hollywood Scat Amateurs No. 7" - The movie starts in what appeared to be a private residence. The windows were covered with dark, blackout curtains, the furniture was pushed off to the sides of the room and clear sheets of plastic covered the floor. Only one female and one male were in the room and only the lower portion of the male's body was filmed. The male filmed the scenes himself. The same male ordered the female to commit various acts including oral sex, urination, placing what appeared to be feces in her mouth, smearing feces on her face and body, and smearing feces on the male's penis on which the female then performed oral sex. There were numerous scenes where the female placed what appeared to be feces in her mouth then chewed and spit the feces back out. The female urinated in a glass pan, placed feces in the urine, then poured the urine in a glass and drank some of the urine. The female also performed oral sex on the anus of the male. The male also had intercourse with the female from behind while the female straddled a leather desk chair.

"BAE 20" - The dialog in the movie was also in a foreign language. The movie had multiple scenes in which various males engaged in sexual activity with various females. The scenes were always with one female and either one or two males. The scenes occurred at various locations, including a bedroom, office, kitchen, and bathroom. The various scenes included masturbation by the males and females, anal sex, oral sex of the penis and anus, urination and defecation. There were approximately 9 scenes that involved males defecating on the females' faces and in their mouths. In several of the scenes the males smeared the feces on the females' faces. There were approximately 5 scenes that involved males urinating on the females' faces and in their

mouths.

"Mako's First Time Scat" - All of the scenes involve the same female. Males were also depicted in the scenes. A male bound the woman in a variety of ways, including duct taping her wrists to her ankles and suspending her from the ceiling with rope. The male slapped and whipped the female. A male urinated in the female's mouth and she drank it. The female defecated in a bowl and ate it. A male rubbed feces on the female's face and then she rubbed it in her hair and all over her body. The female ate feces and performed oral sex on the male while she had feces in her mouth. A male forced his penis into the female's throat causing her to vomit several times. A male inserted his fingers into the woman's mouth causing her to vomit. A male inserted his fingers into the woman's anus, removed feces, and had the female suck his fingers. At one point, a male held a champagne glass under the woman's anus and the woman released semen from her anus into the glass. The female, then, drank the semen. The female drank from a bowl of her own urine and feces. The female cried through much of the video.