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15 UNITED STATES DISTRICT COURT
16 CENTRAL DISTRICT OF CALIFORNIA
17

18 UNITED STATES OF AMERICA,)
) **NO. CR-07-732-GHK**
19 Plaintiff,)
)
20 v.) **GOVERNMENT'S PROPOSED**
) **VOIR DIRE QUESTIONS**
21 IRA ISAACS,)
 dba "Stolen Car Films,")
22 dba "LA Media,")
)
23 Defendant.)
)
24)
)
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26 The United States of America, by and through the United States
27 Attorney for the Central District of California, submits the following
28 proposed voir dire questions.

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FACTUAL BACKGROUND

Defendant Ira Isaacs, doing business as "Stolen Car Films" and "LA Media," is charged with transportation of obscene matter, in violation of 18 U.S.C. § 1465, and transportation of obscene material using a common carrier, in violation of 18 U.S.C. § 1462. The trial for this case is currently scheduled for April 22, 2008.

This factual background is provided for illustrative purposes only and is not intended by the parties to be used in the jury questionnaire.

STATEMENT OF THE CASE

The government proposes that the following statement of the case be provided to prospective jurors in the Court's jury questionnaire:

The government alleges, in substance, that the defendant, doing business in the state of California as "Stolen Car Films" and "LA Media," among other things, transported, distributed, or sent by common carrier sexually explicit movies which the government asserts violate the obscenity laws of the United States. The movies which the government asserts are "obscene" as that term "obscene" will be defined by the Court are "Gang Bang Horse 'Pony Sex Game,'" "Mako's First Time Scat," "Hollywood Scat Amateurs No. 7," and "BAE 20," also known as "Avantgarde Extreme."

1 2. If you are selected as a juror in this case, you will be
2 required to view pornography or sexually explicit movies, some
3 of which portrays violence against women. Has any member of
4 this panel, or a close friend or relative of yours, had a sexual
5 experience, or an experience of any type, which you feel would
6 cause you not to be a fair and impartial juror and follow the
7 judge's instructions?

8
9 3. The sexually explicit movies which the government asserts are
10 "obscene" and in violation of the laws of the United States are
11 "Gang Bang Horse 'Pony Sex Game,'" "Mako's First Time Scat,"
12 "Hollywood Scat Amateurs No. 7," and "BAE 20," also known as
13 "Avantgarde Extreme." Has any member of this jury panel seen
14 any of these movies or heard about their content?

15
16 4. Has any member of the jury panel heard of the defendant Ira
17 Isaacs, or either of his businesses "LA Media" or "Stolen Car
18 Films"?

19
20 5. Has any member of the jury panel ever worked in the
21 entertainment or media business, including working as a
22 performer at a strip club?

23
24 6. Has any member of the jury panel ever had any education,
25 training, or worked in the medical profession, including the
26 field of psychiatry or psychology?

- 1 7. Has any member of the jury panel ever had any education,
2 training, or worked in the development, production, or
3 distribution of film or movies of any type?
4
- 5 8. Has any member of the jury panel ever had any education,
6 training, or worked in the internet industry?
7
- 8 9. Has any member of the jury panel ever had any education,
9 training, or worked as an artist or as a graphic designer?
10
- 11 10. Does any member of the jury panel feel that a person or business
12 should be free to produce or distribute material or movies of
13 any type, including pornography, without government regulation?
14
- 15 11. This case involves charges brought by the United States
16 government which allege violations of this country's obscenity
17 laws. These laws, which have been upheld by the United States
18 Supreme Court, make it illegal to sell or distribute obscenity
19 in interstate commerce. Does any member of the jury panel hold
20 the view that anything, no matter how objectionable, should be
21 permitted as free speech, regardless of what this country's
22 obscenity laws may say?
23
- 24 12. Has any member of the jury panel ever purchased in the store, at
25 the movies, on the television, or from the internet any sexually
26 explicit or pornographic movie?
27

1 13. Are you now or have you previously been a member of or
2 contributor to any groups or organizations which advocate more
3 enforcement or strengthening of obscenity laws or actively
4 oppose the production or distribution of any form of
5 pornography, including: American Family Association, Athletes
6 and Business Leaders for Kids, Children's Legal Foundation,
7 Christian Legal Society, Christian Medical Society, Citizens
8 Against Pornography, Citizens for Decency through Law, Concerned
9 Citizens for Community Values, Concerned Women of America,
10 Family Research Council, Focus on the Family, Morality in Media,
11 National Center for Protection of Children and Families,
12 National Coalition Against Pornography, National Family Legal
13 Foundation, National Federation for Decency, National Law Center
14 for Children and Families, Religious Alliance Against
15 Pornography, and Women Against Pornography.

16
17 14. Are you now or have you previously been a member of or
18 contributor to any groups or organizations which advocate less
19 enforcement or repeal of obscenity laws or actively support the
20 production or distribution of any form of pornography,
21 including: Action for Children's Television, Adult Film
22 Association of America, Adult Video Association, American
23 Booksellers Association, American Civil Liberties Union,
24 American Library Association, Anti-Censorship Coalition,
25 Committee for Intellectual Freedom, First Amendment Lawyers
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1 Association, Free Speech Coalition and Video Software Dealers
2 Association.

3
4 15. The Central District of California is defined as the city of Los
5 Angeles and several counties, including the counties of Los
6 Angeles, Orange, Riverside, San Bernardino, San Luis Obispo,
7 Santa Barbara, and Ventura. Has any member of the jury panel
8 not lived in the Central District of California for any period
9 of time between the years 2004 and 2007?

10
11 16. Has any member of the jury panel lived in the state of
12 California less than ten years?

13
14 17. Does any member of the jury panel have any personal,
15 philosophical, political, or religious beliefs which will cause
16 you not to be a fair and impartial juror and follow the Court's
17 instructions concerning the acceptance and application of the
18 obscenity laws of the United States and the rules of the Court?

19
20 18. The evidence in this case will include the testimony of agents
21 from the Federal Bureau of Investigation and possibly other
22 members of the law enforcement community, including Los Angeles
23 Police Department. Has any member of the jury panel ever had
24 any experience, or do you know of any situation experienced by
25 any other person, that would cause you to consider the testimony
26 of a law enforcement official in this case less credible, or
27 more credible, than any other witness?

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Respectfully submitted this 7th day of March 2008.

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United States Attorney

CHRISTINE C. EWELL
Assistant United States Attorney
Chief, Criminal Division

/S/
CRAIG H. MISSAKIAN
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