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(f)(4): Improper Record Keeping
for Material Depicting Sexual

Activity; 18 U.S.C. § 1467:

Criminal Forfeiture]

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

February 2007 Grand Jury

CR No. 07-07-00732 UNITED STATES OF AMERICA, INDICTMENT Plaintiff, [18 U.S.C. § 1462(a): v. Importation or Transportation of Obscene Material; 18 U.S.C. IRA ISAACS, dba "Stolen Car Films," § 1465: Importation or Transportation of Obscene dba "LA Media," Material for Sale or Distribution; 18 U.S.C. § 2257 Defendant.

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The Grand Jury charges:

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COUNTS ONE THROUGH FOUR

[18 U.S.C. § 1465]

On or about the following dates, in Los Angeles County, within the Central District of California and elsewhere, defendant IRA ISAACS, doing business as "Stolen Car Films" and "LA Media," knowingly used a facility and means of interstate and foreign commerce, and an interactive computer service in and affecting interstate and foreign commerce, for the purpose of KW:kw

selling and distributing the following obscene pictures and films, namely, the movies with the following titles:

Count	Date	Movie Title
One	May 11, 2004	"GANG BANG HORSE 'PONY SEX GAME'"
Two	July 21, 2006	"MAKO'S FIRST TIME SCAT"
Three	October 20, 2006	"HOLLYWOOD SCAT AMATEURS NO. 7"
Four	October 26, 2006	"BAE 20"

COUNTS FIVE AND SIX

[18 U.S.C. § 1462(a)]

Between on or about October 20, 2006 and October 26, 2006, in Los Angeles County, within the Central District of California and elsewhere, defendant IRA ISAACS, doing business as "Stolen Car Films" and "LA Media," knowingly used an express company, common carrier, and interactive computer service, for carriage in interstate commerce and delivery to a location outside the State of California, packages which contained the following obscene pictures and films, namely, the movies with the following titles:

Count	Date	Movie Title
Five	October 20, 2006	"HOLLYWOOD SCAT AMATEURS NO. 7"
Six	October 26, 2006	"BAE 20"

COUNTS SEVEN AND EIGHT

[18 U.S.C. § 2257(f)(4)]

On or about October 20, 2006, in Los Angeles County, within the Central District of California and elsewhere, defendant IRA ISAACS, doing business as "Stolen Car Films" and "LA Media," knowingly sold and otherwise transferred and offered for sale and transfer, the following films and videos, namely, DVDs containing the movies with the following titles, which were intended for shipment in interstate commerce, which contained one or more visual depictions of actual sexually explicit conduct made after December 1991, and which were produced in whole or in part with materials which had been mailed or shipped in interstate or foreign commerce, and which did not have affixed thereto a statement describing where the required age documentation records for all performers depicted in the visual depictions of actual sexually explicit conduct could be located:

Count	Date	Movie Title
Seven	October 20, 2006	"HOLLYWOOD SCAT AMATEURS NO. 7"
Eight	October 20, 2006	"LAURIE'S TOILET SHOW"

FORFEITURE ALLEGATIONS

[18 U.S.C. § 1467]

- 1. The allegations of Counts One through Six of this indictment are re-alleged and incorporated herein by reference as if fully restated here for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 1467.
- 2. As a result of the violations of Title 18, United States Code, Sections 1462 and 1465 described in Counts One through Six of this indictment, defendant IRA ISAACS, doing business as "Stolen Car Films" and "LA Media," shall forfeit to the United States, pursuant to title 18, United States Code, Section 1467, all obscene material produced, transported, mailed, shipped and received in connection with the offense charged in Counts One through Six of this indictment, and all property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense(s), and all property, real or personal, used or intended to be used to commit or to promote the commission of such offense(s).
- 3. The interests of defendant subject to forfeiture pursuant to Title 18, United States Code, Section 1467 include, but are not limited to, the following items:
- (a) All copies of "Gang Bang Horse 'Pony Sex Game,'" Mako's First Time Scat," "Hollywood Scat Amateurs No. 7," "BAE 20," and "Laurie's Toilet Show."

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- Gross profits from all sales of "Gang Bang Horse 'Pony Sex Game, " Mako's First Time Scat, " "Hollywood Scat Amateurs No. 7," and "BAE 20."
- (c) Ownership and rights to the domain name and websites www.scatmovies.com, www.scatcinemax.com, and www.stolencarfilms.com.
- To the extent that the property described above as being subject to forfeiture pursuant to Title 18, United States Code, Section 1467, as a result of any act or omission of the defendant:
 - (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred to, sold to, or deposited with a third person;
 - (c) has been placed beyond the jurisdiction of the court;
 - (d) has been substantially diminished in value; or
- (e) has been commingled with other property that cannot be subdivided without difficulty, the United States shall be entitled to forfeiture of substitute property under the provisions of Title 18, United States Code, Section 1467(n), and the court shall order the forfeiture of any other property of the defendant up to the value of any property described in paragraphs (1) through (3) above.

1	5. The above-named Defendant is liable for the forfeiture		
2	obligations as alleged above.		
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7		roreperson	
8	BRENT WARD	GEORGE S. CARDONA	
9	Director, Obscenity Prosecution Task Force	United States Attorney	
10	United States Department of Justice	THOMAS P. O'BRIEN	
11	KENNETH WHITTED	Assistant United States Attorney Chief, Criminal Division	
12	Trial Attorney Obscenity Prosecution Task		
13	Force United States Department of	CRAIG H. MISSAKIAN	
14	Justice	Assistant United States Attorney	
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