

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No. 25-CR-14-CJW
)	
vs.)	JURY INSTRUCTIONS
)	
MATTHEW JASON MANOS,)	
)	
Defendant.)	

Members of the Jury:

In the next few moments, I will give you instructions about this case and about your duties as jurors. I will also give you additional instructions later. Unless I specifically tell you otherwise, all instructions—both those I give you now and those I give you later—are equally binding on you and must be followed.

The instructions I am about to give you now are in writing and will be available to you in the jury room. In considering these instructions, attach no importance or significance whatsoever to the order in which they are given.

INSTRUCTION NO. 1

This is a criminal case the United States has brought against the defendant. The charges are set forth in what is called an Indictment.

Count 1 of the Indictment charges that, between in or about December 2022 and February 2023, in the Northern District of Iowa, the defendant knowingly received visual depictions of minors engaged in sexually explicit conduct, using a means and facility of interstate and foreign commerce, and said visual depictions having been transported in and affecting interstate and foreign commerce.

Count 2 of the Indictment charges that, between in or about December 2022 and February 2023, in the Northern District of Iowa, the defendant knowingly possessed visual depictions of minors engaged in sexually explicit conduct, including a depiction involving a prepubescent minor or a minor who had not attained 12 years of age, said visual depictions having been produced using materials that had previously been shipped and transported in and affecting interstate and foreign commerce, namely, a Samsung Model SM-J737R4 cellular telephone that had been manufactured outside the state of Iowa, and said visual depictions having been transported in and affecting interstate and foreign commerce and using a means and facility of interstate and foreign commerce.

The defendant has pleaded not guilty to these charges. Keep in mind that each count charges a separate crime. You must consider each count separately and return a separate verdict for each count.

(CONTINUED)

INSTRUCTION NO. 1 (Cont'd)

This instruction describes the charges in the Indictment. The government may charge a defendant using conjunctive (“and”) language, but the government may prove its case in the disjunctive. Accordingly, these instructions use disjunctive (“or”) language. For example, the Indictment uses the words “interstate and foreign commerce,” while the following instructions use the words “interstate or foreign commerce.” The elements of the offenses, or the things the government must prove, are set forth in the following instructions.

You are instructed that an indictment is simply an accusation. It is not evidence of anything. The defendant has pleaded not guilty and is presumed to be innocent unless and until proven guilty beyond a reasonable doubt. Thus, the defendant begins the trial with a clean slate, with no evidence against him. The presumption of innocence alone is sufficient to find the defendant not guilty and can be overcome only if the government proves during the trial, beyond a reasonable doubt, each element of the crime charged.

There is no burden upon the defendant to prove that he is innocent. Instead, the burden of proof remains on the government throughout the trial. Accordingly, if the defendant does not testify, you must not consider that fact in any way, or even discuss it, in arriving at your verdict.

You will note that the Indictment alleges that the offenses were committed “in or about” certain dates. The government need not prove with certainty the exact date of the charged offenses. It is sufficient if the evidence establishes that the offenses occurred within a reasonable time of the dates alleged in the Indictment.

You are instructed that Coggon, Iowa is in the Northern District of Iowa.

INSTRUCTION NO. 2

The offense of receipt of child pornography, as charged in Count 1 of the Indictment, has three elements, which are:

One, between in or about December 2022 and February 2023, in the Northern District of Iowa, the defendant knowingly received one or more visual depictions of child pornography;

Two, the defendant knew that the visual depiction or depictions were of a minor engaging in sexually explicit conduct; and

Three, one or more of the following occurred:

- (a) the defendant received the visual depiction or depictions using a means or facility of interstate or foreign commerce; or
- (b) the visual depiction or depictions had moved in interstate or foreign commerce.

You may see or hear evidence of more than one visual depiction involved in the offense. You must agree unanimously as to which visual depiction or depictions the defendant received.

For you to find the defendant guilty of this crime, the government must prove all these elements beyond a reasonable doubt; otherwise, you must find the defendant not guilty of the offense of receipt of child pornography as charged in Count 1 of the Indictment.

INSTRUCTION NO. 3

The offense of possession of child pornography, including a depiction that involved a prepubescent minor or a minor who had not attained 12 years of age, as charged in Count 2 of the Indictment, has four elements, which are:

One, between in or about December 2022 and February 2023, in the Northern District of Iowa, the defendant knowingly possessed one or more visual depictions of child pornography;

Two, the defendant knew that the visual depiction or depictions were of a minor engaging in sexually explicit conduct;

Three, one or more of the following occurred:

- (a) the visual depiction or depictions had been produced using a Samsung Model SM-J737R4 cellular telephone that had been moved in interstate or foreign commerce;
- (b) the visual depiction or depictions had moved in interstate or foreign commerce; or
- (c) the visual depiction or depictions had been moved using a means or facility of interstate or foreign commerce; and

Four, one or more of the visual depictions involved a minor who defendant knew to be prepubescent or yet to attain 12 years of age.

You may see or hear evidence of more than one visual depiction involved in the offense. You must agree unanimously as to which visual depiction or depictions the defendant possessed.

(CONTINUED)

(INSTRUCTION NO. 3 Cont'd)

For you to find the defendant guilty of this crime, the government must prove all these elements beyond a reasonable doubt; otherwise, you must find the defendant not guilty of the offense of possession of child pornography that involved a prepubescent minor or a minor who had not attained 12 years of age, as charged in Count 2 of the Indictment.

If you find the defendant not guilty of the crime of “possessing child pornography that involved a prepubescent minor or a minor who had not attained 12 years of age,” but if you find unanimously that the government has proven Elements One, Two, and Three beyond a reasonable doubt, then you must find the defendant guilty of the crime of “possessing child pornography.”

INSTRUCTION NO. 4

Reasonable doubt is doubt based upon reason and common sense, and not doubt based on speculation. A reasonable doubt may arise from careful and impartial consideration of all the evidence, or from a lack of evidence. Proof beyond a reasonable doubt is proof of such a convincing character that a reasonable person, after careful consideration, would not hesitate to rely and act upon that proof in life's most important decisions. Proof beyond a reasonable doubt is proof that leaves you firmly convinced of the defendant's guilt. Proof beyond a reasonable doubt does not mean proof beyond all possible doubt.

INSTRUCTION NO. 5

The law recognizes several kinds of possession. A person may have actual possession or constructive possession. A person may have sole possession or joint possession.

A person who knowingly has direct physical control over a thing, at a given time, is then in actual possession of it.

A person who, although not in actual possession, has both the power and the intention at a given time to exercise dominion or control over a thing, is then in constructive possession of it. A person may constructively possess something by having dominion or control over the thing or the place where the thing is located. To find a person constructively possessed a thing, you must find that person knew the thing was present, had the ability to control it, and had the intent to do so. A person may constructively possess something either directly or through another person or persons.

If one person alone has actual or constructive possession of a thing, possession is sole. If two or more persons share actual or constructive possession of a thing, possession is joint.

Whenever the words “possession” or “possess” have been used in these instructions it includes actual as well as constructive possession and also sole as well as joint possession.

INSTRUCTION NO. 6

You are further instructed that the following definitions apply:

“Child pornography” means any visual depiction of a minor engaging in sexually explicit conduct where the minor was engaged in the sexually explicit conduct during the production of the depiction.

“Minor” means any person under the age of 18 years.

“Sexually explicit conduct” means actual or simulated sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex; masturbation; sadistic or masochistic abuse; or lascivious exhibition of the genitals, or pubic area, or anus of any person.

Not every exposure of the genitals, or pubic area, or anus, constitutes lascivious exhibition. Whether a visual depiction of the genitals, or pubic area, or anus, constitutes a lascivious exhibition requires a consideration of the overall content of the material. You may consider such factors as: (1) whether the focal point of the picture is on the minor’s genitals, or pubic area, or anus; (2) whether the setting of the picture is sexually suggestive, that is, in a place or pose generally associated with sexual activity; (3) whether the minor is depicted in an unnatural pose or in inappropriate attire, considering the age of the minor; (4) whether the minor is fully or partially clothed, or nude; (5) whether the picture suggests sexual coyness or a willingness to engage in sexual activity; (6) whether the picture is intended or designed to elicit a sexual response in the viewer; (7) whether the picture portrays the minor as a sexual object; and (8) the caption on the picture.

It is for you to decide the weight or lack of weight to be given to any of these factors. A picture need not involve all these factors to constitute a lascivious exhibition of the genitals, or pubic area, or anus.

(CONTINUED)

(INSTRUCTION NO. 6 Cont’d)

“Visual depiction” includes any photograph, film, video, picture, or

computer-generated image or picture, whether made or produced by electronic, mechanical, or other means. It includes undeveloped film and data stored on a computer disk or by electronic means which is capable of conversion into a visual image.

“Interstate commerce” means commerce between any combination of states, territories and possessions of the United States, including the District of Columbia.

“Foreign commerce” means commerce between any state, territory, or possession of the United States and a foreign country.

“Commerce” includes, among other things, travel, trade, transportation and communication.

Images transmitted or received over the Internet have moved in interstate or foreign commerce. It is for you to determine, however, if a visual depiction had been transmitted or received over the Internet.

A “means or facility of interstate commerce” includes: (1) the Internet; (2) e-mail, such as Gmail; (3) messaging applications; and (4) a cell phone, if it is used to communicate, transmit, or receive information.

“Moved in interstate or foreign commerce” means that the item or items described, at any time, traveled or moved between one state and another or one country and another. The government does not have to prove that the defendant knew that the material in question had moved in interstate or foreign commerce, and it is not necessary for the government to prove that the defendant personally moved the material in interstate or foreign commerce. It is sufficient that the government prove that at some point before or during the charged conduct, the item traveled in interstate or foreign commerce.

INSTRUCTION NO. 7

The government is not required to prove that the defendant knew that his acts or omissions were unlawful. An act is done knowingly if the defendant is aware of the act and does not act through ignorance, mistake, or accident.

Knowledge may be proved like anything else. You may consider any acts done or statements made by the defendant in connection with the offense, and all the facts and circumstances in evidence which may aid in a determination of the defendant's knowledge.

INSTRUCTION NO. 8

It will be your duty as jurors to decide from the evidence whether the defendant is guilty or not guilty of the crimes charged. From the evidence, you will decide what the facts are. You are entitled to consider that evidence in the light of your own observations and experiences in the affairs of life. You may use reason and common sense to draw deductions or conclusions from facts which have been established by the evidence. You will then apply those facts to the law which I give you in my instructions. You are the sole judges of the facts, but you must follow the law as stated in my instructions, whether you agree with it or not.

Do not allow sympathy or prejudice to influence you. The law demands of you a just verdict, unaffected by anything except the evidence, your common sense, and the law as I give it to you.

You should not take anything I may say or do during the trial as indicating what I think of the evidence or what I think your verdict should be.

Finally, please remember that only this defendant, not anyone else, is on trial here, and that the defendant is on trial only for the crimes charged, not for anything else.

INSTRUCTION NO. 9

I have mentioned the word “evidence.” The “evidence” in this case consists of the following: the testimony of the witnesses, the documents and other things received as exhibits, and the facts that have been stipulated—that is, formally agreed to by the parties.

You may use reason and common sense to draw deductions or conclusions from facts that are established by the evidence in the case.

Certain things are not evidence. I will list those things for you now:

1. Statements, arguments, questions, and comments by the lawyers are not evidence.
2. Anything that might have been said by jurors, the attorneys, or the judge during the jury selection process is not evidence.
3. Objections are not evidence. The parties have a right to object when they believe something is improper. You should not be influenced by the objection. If I sustain an objection to a question, you must ignore the question and must not try to guess what the answer might have been.
4. Testimony that I strike from the record, or tell you to disregard, is not evidence and must not be considered.
5. Anything you see or hear about this case outside the courtroom is not evidence.

During the trial, documents and objects may be referred to but not admitted into evidence. In such a case, these items will not be available to you in the jury room during deliberations.

Furthermore, a particular item of evidence is sometimes received for a limited purpose only. That is, it can be used by you only for one particular purpose, and not for any other purpose. I will tell you if this occurs and instruct you on the purposes for which the item can and cannot be used.

INSTRUCTION NO. 10

There are two types of evidence from which you may properly find the truth as to the facts of this case: direct evidence and circumstantial evidence. Direct evidence is the evidence of the witnesses to a fact or facts of which they have knowledge by means of their senses. The other is circumstantial evidence—the proof of a chain of circumstances pointing to the existence or nonexistence of certain facts. The law makes no distinction between direct and circumstantial evidence. You should give all evidence the weight and value you believe it is entitled to receive.

INSTRUCTION NO. 11

The jurors are the sole judges of the weight and credibility of the testimony, and the value to be given to the testimony, of each witness who testifies in this case. In deciding what the facts are, you may have to decide what testimony you believe and what testimony you do not believe. You may believe all of what a witness says, or only part of it, or none of it.

In deciding what testimony of any witness to believe, consider the witness's intelligence, the opportunity the witness had to have seen or heard the things testified about, the witness's memory, any motives that witness may have for testifying a certain way, the manner of the witness while testifying, whether that witness said something different at an earlier time, the general reasonableness of the testimony, and the extent to which the testimony is consistent with other evidence that you believe.

In deciding whether to believe a witness, keep in mind that people sometimes hear or see things differently and sometimes forget things. You need to consider, therefore, whether a contradiction is an innocent misrecollection or lapse of memory or an intentional falsehood, and that may depend on whether it has to do with an important fact or only a small detail.

If the defendant chooses to testify, you should judge that testimony in the same manner as you judge the testimony of any other witness.

You should not give any more or less weight to a witness's testimony just because the witness is a public official, law enforcement officer, or someone knowledgeable in their field.

INSTRUCTION NO. 12

In the previous instruction, I instructed you generally on the credibility of witnesses. I now give you this further instruction on how the credibility of a witness can be “impeached” and how you are to consider the testimony of certain witnesses.

A witness may be discredited or impeached by contradictory evidence; by showing that the witness testified falsely concerning a material matter; by showing that the witness has a motive to be untruthful; or by evidence that at some other time the witness has said or done something, or has failed to say or do something, that is inconsistent with the witness’s present testimony.

You may hear evidence that some witnesses were once convicted of a crime. If so, you may use that evidence only to help you decide whether you believe those witnesses and how much weight to give their testimony.

INSTRUCTION NO. 13

You may hear testimony from persons who may be knowledgeable in a field because of their education, experience, or both. They are permitted to give their opinions on matters in that field and may also state the reasons for their opinions.

You may accept or reject the testimony of these witnesses just like any other testimony. After considering such a witness's education and experience, the reasons given for the opinion, and all the other evidence in the case, you may give that witness's testimony whatever weight, if any, you think it deserves.

INSTRUCTION NO. 14

You may hear video recordings of conversations. These conversations were legally recorded, and you may consider the recordings just like any other evidence.

You may also see transcripts of the recordings I have just mentioned. These transcripts are provided to aid you in listening to the recordings. The transcripts also undertake to identify the speakers engaged in the conversation.

Differences in meaning between what you hear in the recordings and read in the transcripts may be caused by such things as the inflection in a speaker's voice. You should, therefore, rely on what you hear rather than what you read when there is a difference.

The transcripts themselves are not evidence, and will not be provided to the jury during deliberations. Rather, the transcripts are only an aid to the jury in understanding the recordings. The recordings, not the transcripts, are the evidence.

INSTRUCTION NO. 15

You may hear testimony that the defendant made statements to law enforcement. It is for you to decide:

First, whether the defendant made the statement; and

Second, if so, how much weight you should give to it.

In making these two decisions, you should consider all the evidence, including the circumstances under which the statements may have been made.

INSTRUCTION NO. 16

You may hear evidence that the defendant may have committed child molestation, including accessing with intent to view child pornography, at some other date not charged in the Indictment. The defendant is not charged with these other offenses. You may consider this evidence only if you unanimously find it is more likely true than not true. You decide that by considering all the evidence and deciding what evidence is more believable. This is a lower standard than proof beyond a reasonable doubt.

If you find that these offenses have not been proved, you must disregard them. If you find that these offenses have been proved, you may consider them to help you decide any matter to which they are relevant. You should give them the weight and value you believe there are entitled to receive. You may consider the evidence of such other acts of child molestation for its tendency, if any, to show the defendant's propensity to engage in child molestation, as well as its tendency, if any, to determine whether the defendant committed the acts charged in the Indictment, to determine the defendant's intent and knowledge, and to rebut any contention of the defendant that his participation in the offenses charged in the Indictment was the result of accident or mistake. Remember, the defendant is on trial only for the crimes charged. You may not convict a person simply because you believe he may have committed similar acts in the past.

INSTRUCTION NO. 17

Exhibits will be admitted into evidence and are to be considered along with all the other evidence to assist you in reaching your verdicts. During your deliberations, you are not to tamper with the exhibits or their contents, and you should leave the exhibits in the jury room in the same condition as you received them.

INSTRUCTION NO. 18

At the end of the trial, you must make your decisions based on what you recall of the evidence. You will not have a written transcript to consult. Therefore, you must pay close attention to the testimony as it is given.

If you wish, you may take notes during the presentation of evidence to help you remember what witnesses said. If you do take notes, please keep them to yourself until you and your fellow jurors go to the jury room to decide the case. Do not let note-taking distract you so that you do not hear other answers by the witnesses.

During deliberations, in any conflict between your notes, a fellow juror's notes, and your memory, your memory must prevail. Notes sometimes contain the mental impressions of the note taker and can be used only to help you recollect what the testimony was.

We have given each juror an envelope with a pad and pen in it. The envelopes are numbered according to your seat in the jury box. When you leave for breaks or at night, please put your pad and pen in the envelope and leave the envelope on your chair. Your notes will be secured, and they will not be read by anyone. At the end of trial and your deliberations, your notes should be left in the jury room for destruction.

INSTRUCTION NO. 19

During the trial, it may be necessary for me to talk with the lawyers out of the hearing of the jury, either by having a bench conference while the jury is present in the courtroom or by calling a recess. If a bench conference is held in the courtroom, we will switch on what we refer to as “white noise” so that the jurors cannot hear what we are saying. While bench conferences are being conducted, you should feel free to stand and stretch and visit among yourselves about anything except the case.

INSTRUCTION NO. 20

The trial will proceed in the following manner:

First, the attorney for the government will make an opening statement. Next, the attorney for the defendant may, but does not have to, make an opening statement. An opening statement is not evidence but is simply a summary of what the attorneys expect the evidence to be.

The government will then present its evidence, and the attorney for the defendant may cross-examine the government's witnesses. Following the government's case, the defendant may, but does not have to, present evidence, testify, or call other witnesses. If the defendant calls witnesses, the attorney for the government may cross-examine them.

After the presentation of evidence is completed, the attorneys will make their closing arguments to summarize and interpret the evidence for you. As with opening statements, closing arguments are not evidence. After that, the Court will instruct you further regarding your deliberations, and you will retire to deliberate on your verdicts.

INSTRUCTION NO. 21

During the trial, to ensure fairness, you as jurors must obey the following rules.

First, do not talk among yourselves about this case, or about anyone involved with it, until the end of the case when you go to the jury room to decide on your verdicts.

Second, do not talk with anyone else about this case, or about anyone involved with it, until the trial has ended and you have been discharged as jurors.

Third, do not use any electronic device or media, such as a cell or smart phone, computer, the Internet, any Internet service, any text or instant messaging service, any Internet chat room, blog, or website such as Facebook, YouTube, or the like, to communicate to anyone any information about this case, or your opinions concerning it, until the trial has ended and you have been discharged as jurors.

Fourth, when you are outside the courtroom, do not let anyone tell you anything about the case, or about anyone involved with it, until the trial has ended and I have accepted your verdicts. If someone should try to talk with you about the case during the trial, please report it to me through the Court Security Officer.

Fifth, during the trial, you should not talk with or speak to any of the parties, lawyers, or witnesses involved in this case—you should not even pass the time of day with any of them. It is important not only that you do justice in this case, but that you also give the appearance of doing justice. If a person from one side of the case sees you talking to a person from the other side—even if it is simply to pass the time of day—an unwarranted and unnecessary suspicion about your fairness might be aroused. If any lawyer, party, or witness does not speak to you when you pass in the hall or the like, it is because they are not supposed to talk or visit with you.

(CONTINUED)

(INSTRUCTION NO. 21 Cont'd)

Sixth, do not read any news stories or articles about the case, or about anyone involved with it, or listen to any radio or television reports about the case, or about anyone involved with it. In fact, until the trial is over, I suggest that you avoid reading any newspapers or news journals at all, and avoid listening to any TV or radio newscasts at all. I do not know whether there might be any news reports of this case, but, if there are, you might inadvertently find yourself reading or listening to something before you could do anything about it. If you want, you can have your spouse or a friend clip out any stories and set them aside to give you after the trial is over. I can assure you, however, that by the time you have heard the evidence in this case you will know more about the matter than anyone will learn through the news media.

Seventh, do not do any research or make any investigation about the case on your own. Do not consult any reference materials such as the Internet, books, magazines, dictionaries, or encyclopedias. Do not contact anyone to ask them questions about issues that may arise in this case. You are not permitted to talk to anyone (except your fellow jurors) about this case or anyone involved with it until the trial has ended and I have discharged you as jurors.

Eighth, do not make up your mind during the trial about what the verdicts should be. Keep an open mind until after you have gone to the jury room to decide the case and you and your fellow jurors have discussed the evidence.

Dated this _____ day of _____, 2026.

C.J. WILLIAMS, Chief Judge
United States District Court
Northern District of Iowa
IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No. 25-CR-14-CJW
)	
vs.)	FINAL JURY INSTRUCTIONS
)	
MATTHEW JASON MANOS,)	
)	
Defendant.)	

Members of the Jury:

The instructions I gave you at the beginning of the trial and during the trial remain in effect. I will now give you some additional instructions before you begin your deliberations.

You must, of course, continue to follow the instructions I gave you earlier, as well as those I give you now. You must not single out some instructions and ignore others, because all are important. This is true even though the instructions I gave you at the beginning of and during trial are not repeated here.

INSTRUCTION NO. 22

In conducting your deliberations and returning your verdicts, there are certain rules you must follow. I will list those rules for you now.

First, when you go to the jury room, you must select one of your members as your foreperson. That person will preside over your discussions and speak for you in court.

Second, it is your duty, as jurors, to discuss this case with one another in the jury room. You should try to reach an agreement if you can do so without violence to individual judgment, because your verdicts—whether guilty or not guilty—must be unanimous. Each of you must make your own conscientious decisions, but only after you have considered all the evidence, discussed it fully with your fellow jurors and listened to the views of your fellow jurors. Do not be afraid to change your opinions if your discussion persuades you that you should. But do not come to a decision simply because other jurors think it is right or simply to reach your verdicts.

Third, if you find the defendant guilty, the sentence to be imposed is my responsibility. You may not consider punishment in any way when deciding whether the government has proved its case beyond a reasonable doubt.

Fourth, if you need to communicate with me during your deliberations, you may send a note to me through the Court Security Officer, signed by one or more jurors. I will respond as soon as possible either in writing or orally in open court. If you send me a note, you should not tell anyone—including me—how your votes stand numerically.

Fifth, your verdicts must be based solely on the evidence and on the law that I have given to you in my instructions. Each verdict, whether guilty or not guilty, must be unanimous. Nothing I have said or done is intended to suggest what your verdicts should be—that will be entirely for you to decide.

INSTRUCTION NO. 23

Attached to these instructions you will find the Verdict and Interrogatory Forms. These forms are simply the written notices of the decision that you reach in this case. The answers to these forms must be the unanimous decisions of the Jury.

You will take these forms to the jury room, and when you have completed your deliberations and each of you has agreed to the answers to the forms, your foreperson will fill out the forms, sign and date them, and advise the Court Security Officer that you are ready to return to the courtroom. Your foreperson should place the signed forms in the blue folder, which the Court will provide you, and then your foreperson will bring the blue folder when returning to the courtroom.

Finally, members of the Jury, take this case and give it your most careful consideration, and then without fear or favor, prejudice or bias of any kind, return the Verdict Forms and Interrogatory Forms in accord with the evidence and these instructions.

Dated this _____ day of _____, 2026.

C.J. WILLIAMS, Chief Judge
United States District Court
Northern District of Iowa

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,) No. 25-CR-14-CJW
)
 vs.) **VERDICT FORM COUNT 1**
)
MATTHEW JASON MANOS,)
)
 Defendant.)

We, the Jury, unanimously find the defendant, Matthew Jason Manos,
_____ [Not Guilty/Guilty] of the crime of receipt of child
pornography, as charged in Count 1 of the Indictment.

NOTE:

If you unanimously find the defendant not guilty, have your foreperson write “not guilty” in the above blank space, and sign and date this Verdict Form. Then, go on to answer the Verdict Form for Count 2. Do not answer the Interrogatory Form for Count 1.

If you unanimously and beyond a reasonable doubt find the defendant guilty, have your foreperson write “guilty” in the above blank space and sign and date this Verdict Form. Then, go on to answer the Interrogatory Form for Count 1.

FOREPERSON

DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No. 25-CR-14-CJW
)	
vs.)	INTERROGATORY FORM
)	COUNT 1
MATTHEW JASON MANOS,)	
)	
Defendant.)	

If you found the defendant, Matthew Jason Manos, guilty of the crime of receipt of child pornography, as charged in Count 1 of the Indictment, please answer the following questions, then have your foreperson sign and date this Interrogatory Form.

If you found the defendant, Matthew Jason Manos, not guilty of the crime charged in Count 1 of the Indictment, do not answer the following questions.

QUESTION 1: Answer this question by placing a check mark on each of the following spaces that you find the government has proved beyond a reasonable doubt.

We, the Jury, unanimously and beyond a reasonable doubt find the defendant, Matthew Jason Manos, received the following visual depiction or depictions of child pornography:

____ Exhibit 16A

____ Exhibit 17A

____ Exhibit 18A

QUESTION 2: Answer this question by placing a check mark on each of the following spaces that you find the government has proved beyond a reasonable doubt.

We, the Jury, unanimously and beyond a reasonable doubt find the following alternative or alternatives apply for element 3 of the offense:

_____ the defendant received the visual depiction or depictions using a means or facility of interstate or foreign commerce

_____ the visual depiction or depictions had moved in interstate or foreign commerce

FOREPERSON

DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No. 25-CR-14-CJW
)	
vs.)	VERDICT FORM COUNT 2
)	
MATTHEW JASON MANOS,)	
)	
Defendant.)	

Step 1:

We, the Jury, unanimously find the defendant, MATTHEW JASON MANOS, _____ [Not Guilty/Guilty] of the crime of possession of child pornography that involved a prepubescent minor or a minor who had not attained 12 years of age, as charged in Count 2 of the Indictment.

NOTE:

If you unanimously find the defendant not guilty of this offense under Step 1, have your foreperson write “not guilty” in the above blank space. Then, go on to answer Step 2 below and sign and date this Verdict Form.

If you unanimously and beyond a reasonable doubt find the defendant guilty of this offense under Step 1, have your foreperson write “guilty” in the above blank space and sign and date this Verdict Form. Do not answer Step 2. Instead, go on to answer the Interrogatory Form for Count 2.

Step 2:

We, the Jury, unanimously find the defendant, Matthew Jason Manos,
_____ [Not Guilty/Guilty] of the crime of “possessing child
pornography” charged in Count 2 of the Indictment.

NOTE: If you unanimously find the defendant not guilty of the above crime under both steps, have your foreperson write “not guilty” in the above blank space and sign and date this Verdict Form. Do not answer the Interrogatory Form for Count 2. If you unanimously and beyond a reasonable doubt find the defendant guilty of the above crime, have your foreperson write “guilty” in the above blank space and sign and date this Verdict Form. Then, go on to answer the Interrogatory Form for Count 2.

FOREPERSON

DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No. 25-CR-14-CJW
)	
vs.)	INTERROGATORY FORM
)	COUNT 2
MATTHEW JASON MANOS,)	
)	
Defendant.)	

If you found the defendant, Matthew Jason Manos, guilty of the crime charged in Count 2 of the Indictment (under either Step), please answer the following questions, then have your foreperson sign and date this Interrogatory Form.

If you found the defendant, Matthew Jason Manos, not guilty of the crime charged in Count 2 of the Indictment, do not answer the following questions.

QUESTION 1: Answer this question by placing a check mark on each of the following spaces that you find the government has proved beyond a reasonable doubt.

We, the Jury, unanimously and beyond a reasonable doubt find the defendant, Matthew Jason Manos, possessed the following visual depiction or depictions of child pornography:

- ___ Exhibit 19A
- ___ Exhibit 20A
- ___ Exhibit 21A

QUESTION 2: Answer this question by placing a check mark on each of the following spaces that you find the government has proved beyond a reasonable doubt.

We, the Jury, unanimously and beyond a reasonable doubt find the following alternative or alternatives apply for element 3 of the offense:

_____ the visual depiction or depictions had been produced using a Samsung Model SM-J737R4 cellular telephone that had been moved in interstate or foreign commerce

_____ the visual depiction or depictions had moved in interstate or foreign commerce

_____ the visual depiction or depictions had been moved using a means or facility of interstate or foreign commerce

FOREPERSON

DATE