

Zoophilia and the Law: Legal Responses to a Rare Paraphilia

Brian Holoyda, MD, MPH, and William Newman, MD

Although societies' responses to bestiality have varied internationally, the response in the United States has typically involved condemnation and prosecution. Currently, there are 31 states with statutes prohibiting human–animal sexual contact. Despite the prevalence of antibestiality legislation, there is limited case law in the United States. Most commonly, bestiality arises in legal cases involving sexually violent predator (SVP) civil commitments. Identifying offenders who commit acts of bestiality is important, since these individuals may be at increased risk of committing a variety of other sexually and nonsexually violent acts against humans. Because of the different laws among the states, however, commonly used forensic risk assessment tools for sexual recidivism can yield different scores for individuals charged with or convicted of bestiality offenses. Forensic evaluators should consider this factor when conducting risk assessments. State legislatures should also consider modernizing their bestiality statutes to accord with current terminology and objectives for such laws.

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Sexual contact between humans and animals has occurred since the earliest recorded history. Anthropologists have identified European cave paintings estimated to be 15,000 to 20,000 years old depicting sexual acts between humans and other species. Paintings on rocks in ancient Siberia depict intercourse between males and moose.¹ Ancient Egyptians condoned many forms of human–animal sexual behavior on religious grounds, as is reflected in the images of anal–genital and oral–genital contact between humans and goats found on walls of Egyptian tombs.² The ancient Greeks acknowledged cross-species sexual acts in aspects of their mythology. Greek mythological stories, such as the rape of Europa, involve Zeus presenting himself to humans in animal form and copulating with them.

Human–animal sexual acts continue to this day. In the mid-20th century, American psychologist Al-

fred Kinsey³ surveyed individuals in the United States. He reported that 8 percent of males had participated in some form of sexual activity with animals and that 40 to 50 percent of boys growing up on a farm had sex with an animal at least once. Kinsey also reported that 1.5 percent of females had sexual contact with animals before adolescence and 3.6 percent had sexual contact with animals after adolescence.⁴ Three-quarters of these experiences involved dogs. Although these studies made sexual contact with animals seem relatively common, it is unclear to what extent they apply to the population as a whole.

Miletski⁵ studied 93 self-identified zoophiles (82 men and 11 women) in a sample derived from Internet sources and surveyed their reasons for sexual activity with animals. He found that 91 percent of the men and 100 percent of the women stated that it was true or mostly true that sexual attraction to the animal was their motivation for the behavior. Other reasons commonly identified were: wanting “to express love and affection for the animal” (74% of men, 67% of women); “the animals are accepting and easy to please” (67% of men, 56% of women); and “the animal wants it” (66% of men, 67% of women). Williams and Weinberg⁶ found similar reasons for this behavior in a study of 114 white males who had

Dr. Holoyda is a general psychiatry resident and Dr. Newman is Assistant Professor of Psychiatry and Associate Training Director of the Forensic Psychiatry Fellowship Program, Department of Psychiatry and Behavioral Sciences, University of California-Davis School of Medicine, Sacramento, CA. Address correspondence to: Brian Holoyda, MD, MPH, Department of Psychiatry and Behavioral Sciences, University of California-Davis School of Medicine, 2230 Stockton Blvd., 2nd Floor, Sacramento, CA 95817. E-mail: holoyda@gmail.com.

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participated in zoophilic acts. When asked why sexual interest in animals began, the most commonly endorsed reason was “pleasurable sex with animals,” with 44 percent citing this as “a lot” of the reason and 29 percent as “more than a little.” The second most commonly endorsed reason was “a desire for affection,” with 26 percent citing this as “a lot” of the reason, and 23 percent as “more than a little.” These data suggest that most self-identified zoophiles engage in sexual acts with animals because sexual contact with animals is pleasurable and is a way of easily obtaining perceived affection.

The terminology used to describe human–animal sexual behavior is as varied as the acts themselves. Richard Freiherr von Krafft-Ebing,⁷ in his seminal work *Psychopathia Sexualis* originally published in 1886, first used the term “zoophilia erotica” to describe individuals who were both emotionally and sexually attracted to animals. In his 1999 study, Miletski⁵ defined zoophiles similarly, as those who engage in sexual acts with animals to form a relationship with the creature. Self-described zoophiles use the term bestialist to describe individuals who take advantage of animals for sexual gratification without having an emotional bond to the animal. Von Kraft-Ebing’s zoerast is nearly synonymous with bestialist, except that a zoerast prefers animals for sexual gratification even when humans are also available. Recently, Aggrawal⁸ proposed a new classification of zoophilia derived from his 10-tiered classification system for necrophilia, with those individuals

“pathologically less deviant” belonging in Class I (role players) and those more deviant belonging in Class X (exclusive zoophiles). Table 1 summarizes Aggrawal’s proposed classes and additional terms corresponding to those classes.

In mental health, the Diagnostic and Statistical Manual (DSM) is used to establish psychiatric diagnoses of patients with mental disorders. The fourth edition (text revised, DSM-IV-TR)⁹ defines a paraphilia by the presence of “recurrent, intense sexually arousing fantasies, sexual urges, or behaviors generally involving nonhuman objects, the suffering or humiliation of oneself or one’s partner, or children or other nonconsenting persons that occur over a period of at least 6 months (Criterion A).” In addition, the diagnosis is made “if the behavior, sexual urges, or fantasies cause clinically significant distress or impairment in social, occupational, or other important areas of functioning (Criterion B).” In the fifth edition (DSM-5)¹⁰ the criteria remain largely unchanged, although there is an explicit distinction made between a paraphilia and a paraphilic disorder, such that a paraphilia must cause distress or impairment or result in harm or risk of harm to self or others to be considered a disorder. Zoophilia is a term used to describe a paraphilia in which the sexual object is an animal. It falls into the Paraphilia Not Otherwise Specified (DSM-IV-TR) and Other Specified Paraphilic Disorder (DSM-5) categories. Of note, in Aggrawal’s proposed system, zoophilic Classes III through X all fall under the single diagnosis of Para-

Table 1 A Summary of Zoophilic Classes

Class, Name	Characteristics	Alternative Terminology
I, Role player	Enjoys having sex with a living human pretending to be an animal.	“Furry”
II, Romantic zoophile	Keeps an animal as a pet for psychosexual stimulation; does not engage in sexual activity with animals.	—
III, Zoophilic fantasizer	Fantasizes about intercourse with animals, but does not indulge in actual intercourse. May masturbate in the presence of an animal.	Zoophilic voyeurism
IV, Tactile zoophile	Strokes erotic parts of an animal like genitals, anus, or perianal region to achieve orgasm. May rub genitals against an animal.	Zoophilic frotteurism
V, Fetishistic zoophile	Preserves parts of animals like furs to use as a fetish for zoophilic activities.	Zoophilic fetishism
VI, Sadistic bestial	Derives sexual pleasure from sadistic activities with an animal, such as torture.	Zoophilic sadism, zoosadism
VII, Opportunistic zoophile	Engages in sexual acts with animals when consenting humans are not available.	Bestialism
VIII, Regular zoophile	Prefers sexual intercourse with animals; does not enjoy sexual acts with humans.	Zoophilia erotica, Zoerasty (depending on presence or absence of emotional bond)
IX, Homicidal zoophile	Prefers killing an animal and having sex with it over sexual intercourse with a living animal.	Necrozoophilia
X, Exclusive zoophile	Engages exclusively in sex with animals at the exclusion of human partners.	Zoophilia erotica, Zoerasty (depending on presence or absence of emotional bond)

Adapted from Aggrawal.⁸

philia Not Otherwise Specified—Zoophilia or Other Specified Paraphilic Disorder—Zoophilia.⁸ Class I or “role player” is synonymous with the colloquially termed “furry,” and such role-playing behavior does not involve any sexual activity with animals. Although rare, zoophilic acts have been prosecuted and severely punished in many of the states since the nation’s earliest times. Below, we review the modern statutory and case law related to the punishment of this relatively rare behavior.

Statutory Law

There is a large body of legislation in the United States pertaining to sexual acts between human beings and animals. At the federal level, the sole law prohibiting zoophilia is under the military code. The code states that, “any person subject to this chapter who engages in unnatural carnal copulation. . .with an animal is guilty of sodomy” (Ref. 11, p 428). The specific punishment is determined through court-martial. Most legislation surrounding zoophilia, however, has been enacted at the state level. At pres-

ent, 31 states have passed legislation specifically prohibiting sexual contact between humans and animals. Florida and Alaska enacted the two most recent statutes in October 2011. Most states without specific bestiality statutes mention it instead in child protection laws by protecting minors from exposure to explicit materials involving bestiality and from participation in making such materials.¹² For the purpose of this article, we focused on statutes specific to bestiality.

Bestiality statutes vary in establishing the charge’s severity, the definition of bestiality used, and the range of potential postconviction requirements. Of the 31 states with statutes specifically pertaining to sexual acts between humans and animals, 16 impose a felony and 15 impose a misdemeanor. Figure 1 defines these states on a map of the United States. In terms of length of imprisonment, state punishments vary dramatically. The Rhode Island statute, which provides a felony charge for “the abominable and detestable crime against nature,” requires the longest minimum time of imprisonment of seven years.¹³

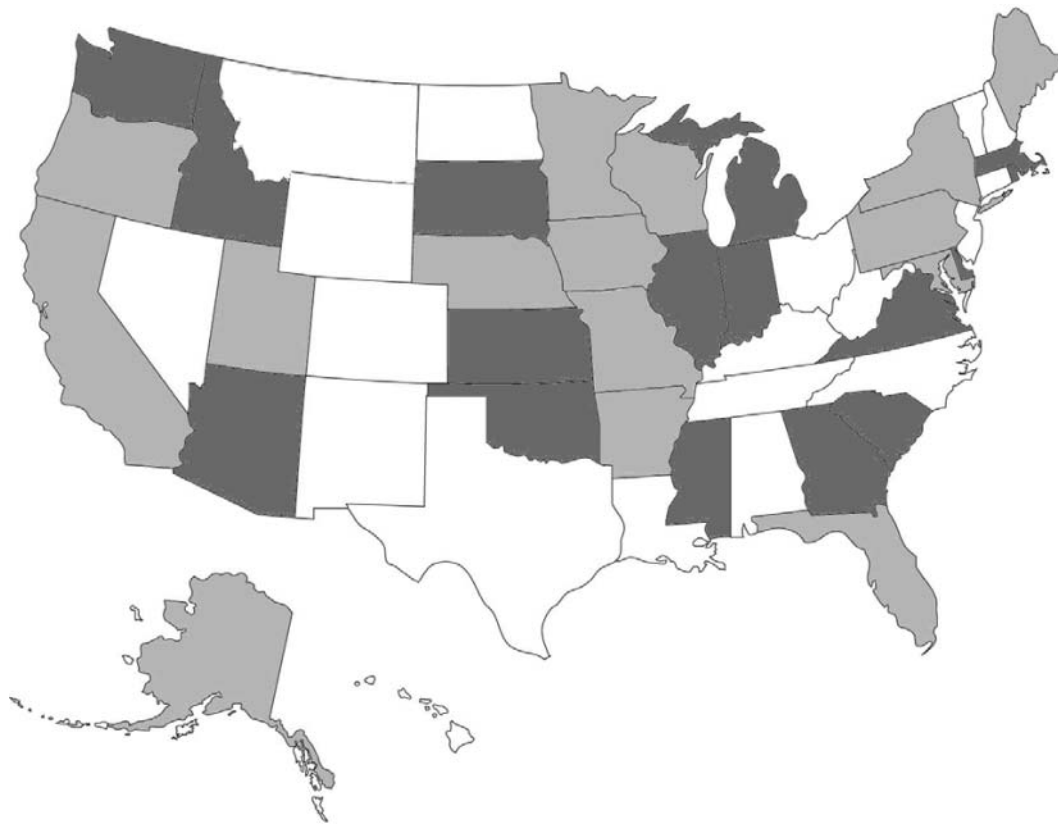


Figure 1. A map of the United States and the charge associated with the states’ antibestiality laws. In those states shaded light gray, bestiality charges incur misdemeanor charges, and in those shaded dark gray they incur felony charges. States without shading have no current statutes against zoophilic acts.

Michigan law, on the other hand, provides the broadest range of potential time in prison. If the convicted is “a sexually delinquent person” (having demonstrated disregard for rights of others by compulsive or forceful sexual acts) at the time of the zoophilic act, he may be imprisoned for “an indeterminate term, the minimum of which shall be one day and the maximum of which shall be life.”¹⁴ Clearly, there are significant differences in length of imprisonment, both within and between state statutes.

The definitions of bestiality used in the state statutes also demonstrate variation. Many states, such as Indiana, explicitly describe which zoophilic acts are prohibited. Under Indiana statute 35-46-3-14, bestiality is defined as “an act involving: a sex organ of a person and the mouth or anus of an animal; a sex organ of an animal and the mouth or anus of a person; any penetration of the human female sex organ by an animal’s sex organ; or any penetration of an animal’s sex organ by the human male sex organ.”¹⁵ Conversely, some states, such as Idaho, remain vague about which behaviors are prohibited. Under Idaho statute 18-6606, “Every person who is guilty of the infamous crime against nature, committed with mankind or with any animal, is punishable by imprisonment in the state prison not less than five years.”¹⁶ Anal penetration is seemingly the focus of this particular legislation. In Indiana, it is clear what sexual acts will be punished, whereas in Idaho the vague description makes it unclear what constitutes a bestiality-related offense. Having explicit, detailed descriptions of punishable acts makes it easier to identify and punish those who engage in prohibited zoophilic acts. Table 2 summarizes the various headings under which bestiality legislation is listed in the state statutes and whether or not the statute provides a clear explanation of what acts are punishable.

Some states describe additional postconviction requirements for individuals convicted of performing zoophilic acts. Under Arizona statute 13-1411, a court can order the convicted to “undergo a psychological assessment and participate in appropriate counseling at the convicted person’s own expense” or even “reimburse an animal shelter. . .for any reasonable costs incurred for the care and maintenance of any animal that was taken to the animal shelter” due to a sexual act.¹⁷ In Rhode Island, a person convicted of a bestiality offense “shall be imprisoned in the Penitentiary for five years or shall pay a fine of not less than five hundred dollars, or both, at the discre-

Table 2 States with Misdemeanor and Felony Charges, Sorted Based on Wording of Statute Title

Misdemeanor	Felony
<u>Bestiality</u>	<u>Bestiality</u>
Arkansas ¹⁸	Arizona ^{*17}
Iowa ¹⁹	Delaware ^{*33}
Minnesota ^{*20}	Georgia ³⁴
Utah ²¹	Indiana ¹⁵
	South Dakota ^{*35}
<u>Cruelty to animals</u>	<u>Cruelty to animals</u>
Alaska ²²	Washington ^{*36}
Maine: subsection Bestiality ²³	
<u>Sexual assault of an animal</u>	<u>Crime against nature,</u>
	<u>Sodomy, or Buggery</u>
California ^{*24}	Idaho ^{*16}
Oregon ²⁵	Kansas ³⁷
	Massachusetts ^{*38}
	Michigan ^{*14}
	Mississippi ^{*39}
	Oklahoma ^{*40}
	Rhode Island ^{*13}
	South Carolina ^{*41}
	Virginia ^{*42}
<u>Other</u>	<u>Other</u>
Florida: Sexual activities involving animals ²⁶	Illinois: Sexual conduct or sexual contact with an animal ⁴³
Maryland: Unnatural or perverted sexual practice ²⁷	
Missouri:* Unlawful sex with an animal ²⁸	
Nebraska: Indecency with an animal ²⁹	
New York:* Sexual misconduct ³⁰	
Pennsylvania:* Sexual intercourse with animal ³¹	
Wisconsin: Sexual gratification ³²	

* Wording contains no specific description of acts that constitute an offense.

tion of the court.”¹³ The variety of punishments suggests the severity with which different states punish zoophilic acts. The following section is a review of specific cases in which the diagnosis of Paraphilia Not Otherwise Specified–Zoophilia has been applied.

Case Law

The United States has a long history of punishing individuals for zoophilic acts. In the early American colonial period, in which all sexual relations outside of wedlock were prohibited, sexual contact with animals was grounds for death. In fact, the first person hanged in the Massachusetts Bay Colony was a juvenile named Thomas Granger, who at age 16 or 17 was sentenced to death for “buggery with a mare, a cowe [sic], two goats, divers sheepe [sic], two calves, and a turkey” (Ref. 44, p 320).

Despite the prevalence of statutory laws regulating zoophilic acts in 31 states, there is limited recent case law. Within the LexisNexis database we performed an advanced search under “federal and state cases,” to identify all reported cases that reached federal or state appellate review. The term “zoophilia” yielded 26 results. Of these, two pairs of reports pertained to the same trial. Of the 24 remaining unique cases, 13 included the term zoophilia in a general list of paraphilias, not specific to any person involved in litigation. Three more cases mentioned zoophilia peripherally, and three cases dealt with obscenity involving the production and sharing of materials involving bestiality. The diagnosis of Paraphilia NOS–Zoophilia was made in only five of the cases. In all five cases, the diagnosis was established in someone who was appealing sexually violent predator (SVP) status or civil commitment after being deemed an SVP.

In *People v. Grant*,⁴⁵ the Court of Appeals of California affirmed a judgment by the Contra Costa County Superior Court that Fred Anthony Grant was an SVP requiring civil commitment. During the trial, two psychologists diagnosed Mr. Grant with Paraphilia NOS–Zoophilia among many other paraphilic diagnoses, including exhibitionism, voyeurism, frotteurism, and pedophilia. Both psychologists opined that the variety of paraphilias in which the defendant participated suggested a wide breadth of sexually deviant behavior, placing him at greater risk of committing future violent offenses. The psychologists’ findings helped the court affirm the county court’s judgment based on Mr. Grant’s increased risk of future sexually violent acts.

Similarly, the Appellate Division of the Superior Court of New Jersey relied heavily on a psychiatrist’s and a psychologist’s opinion to affirm defendant R.M.T.’s civil commitment as an SVP.⁴⁶ The psychiatrist testified that diagnoses of transvestic fetishism and voyeurism would not normally concern him, but “in conjunction with more extreme pathology of arousal to children, animals, multiple victims, it points to a more severe degree of sexual disturbance and more paraphilias” (Ref. 46, p 2).

The three other cases we identified, *The People v. P.T.* (Illinois),⁴⁷ *Medley v. Ludeman* (Minnesota),⁴⁸ and *Cass County State’s Attorney v. Hanenberg* (North Dakota),⁴⁹ all similarly involved civil commitment of an SVP with a diagnosis of Paraphilia NOS–Zoophilia. In no case was SVP status removed or civil commitment reversed. Also, Paraphilia NOS–

Zoophilia was not the sole paraphilic diagnosis in any of the cases reviewed.

One case was not identified by LexisNexis search, but rather was mentioned in a law review.⁵⁰ Calhoun County Circuit Court of Michigan sentenced Jeffrey Haynes to 30 to 240 months’ imprisonment after he pleaded no contest to “committing an abominable and detestable crime against nature with a sheep” in violation of Michigan Compiled Law 50.158. In addition, he was ordered to register as a sex offender under the Sexual Offenders Registration Act (SORA), Michigan Compiled Law 28.721. After Mr. Haynes appealed, the Court of Appeals of Michigan reversed and vacated the decision, because registration as a sex offender under SORA for violation of MCL 750.158 (which deals with sodomy of both humans and animals) was only required if the victim of the offense was a human being under the age of 18. This case raises the important question of whether one who performs zoophilic acts should be required to register as a sex offender because, as discussed below, zoophiles may also participate in additional paraphilic behaviors that put humans at risk.

Discussion

Laws regulating zoophilic behavior could serve an important purpose in society. Research suggests that those who engage in zoophilic acts are at heightened risk of sexual offending against humans,^{5,51,52} though it must be recognized that much of the data on zoophiles comes from individuals imprisoned or seeking evaluation for nonzoophilic behavior. It remains unclear, therefore, how generalizable these data are to “pure zoophiles.” Zoophilic offenders often have significant crossover with other paraphilic behavior. Miletski⁵ identified a link between zoophilia and acts of sadomasochism, with 17 percent of a group of men who engaged in bestiality reporting sadomasochistic fantasies and 25 percent reporting that they had themselves been forced or had forced someone else into undesired sexual activity. In Abel *et al.*,⁵¹ sex offender researchers found that, of a group of men seeking evaluation for paraphilic disorders, those who engaged in bestiality had an average of 4.8 paraphilic diagnoses, including pedophilia, sexual sadism, and frotteurism, all of which potentially harm human victims. In addition, they found that those who engage in zoophilic acts have the highest rate of crossover paraphilic behaviors of

all paraphilic diagnoses.⁵² These findings are borne out in the case law examples discussed earlier.

There is evidence that individuals who engage in zoophilic acts, particularly juveniles, may be at increased risk of committing other sexually violent acts. Fleming *et al.*⁵³ studied 381 juvenile offenders in the Midwest. Of 24 who admitted having engaged in sexual acts with an animal, 23 reported performing sexual offenses against humans. Perhaps most striking is the 2008 study by Abel⁵² of 44,202 adult males evaluated for sexual misconduct. He posited that bestiality is the single greatest risk factor for committing child sexual abuse. Abel's study was cross-sectional and not prospective, however, so it remains unclear which behavior is a risk factor for the other. Still, these data suggest that those who engage in acts of zoophilia are more likely to perform other paraphilic and nonparaphilic sexual acts that put humans at risk. Therefore, laws that help to identify zoophilic offenders could serve as an intervention to prevent future sexual offenses against humans.

In addition to the risk of performing sexual acts that endanger humans, there is some evidence that those who engage in zoophilic acts are at increased risk of committing other criminal acts. In a study of 261 inmates housed in three correctional facilities in the South, Hensley *et al.*⁵⁴ identified 16 inmates who reported prior sexual acts with animals. Inmates who had engaged in zoophilic acts were significantly more likely to have been convicted of a crime against a person (75%, *n* = 12), such as rape, sexual assault, robbery, or assault, than those who reported no history of sex with animals (47.9%, *n* = 125). Inmates who had been convicted of more than three crimes against persons were disproportionately represented in the bestiality group (31.4%, *n* = 5) versus the nonbestiality group (5.4%, *n* = 14). The investigators concluded that childhood and adolescent zoophilic acts may predict later violence toward humans. We suggest that zoophilic behavior may therefore serve as an important marker for future risk of sexual and nonsexual violence.

Because zoophilic acts may represent a significant risk factor for future violence, the laws regulating such behavior have important forensic implications. Forensic psychiatrists and psychologists perform sexual recidivism risk assessments to predict the likelihood that an individual will reoffend after release into the community. As part of these evaluations, many practitioners use standardized instruments to

assign scores to offenders, including the Rapid Risk Assessment for Sexual Offense Recidivism (RRASOR),⁵⁵ and the STATIC-99.⁵⁶ Some practitioners also implement physiologic measurements of arousal in response to sexual stimuli, such as penile plethysmography, as a component of recidivism risk assessment, although there are scant data limited to case studies on the use of these methods in individuals who engage in zoophilic acts.^{57,58}

The scores derived from recidivism risk instruments are frequently used in court to facilitate civil commitment decisions and placement or monitoring of individuals after release from correctional institutions. These risk assessment instruments do not account well for zoophilic offenses. Forensic evaluators may obtain different scores on these instruments with defendants whose previous legal charges have been brought in different states based on whether states prosecute these offenses. The following hypothetical case example highlights potential scoring distinctions on risk assessment instruments based solely on defendants from different states.

Case Example

In this example, the subject is a male, never married or partnered. He was arrested twice during his teens for shoplifting. In his twenties, he was charged with and acquitted of the rape of a female acquaintance. He was caught committing four zoophilic offenses in his thirties and forties. Later, he was caught engaging in sexual activity with an underage female and sent to prison. He is now being evaluated as a potential SVP.

Tables 3 and 4 demonstrate the different scoring on the RRASOR and STATIC-99, depending on the state in which he was caught performing zoophilic acts in his thirties and forties. In Texas there are no laws sanctioning bestiality, so he would not receive points on the RRASOR or STATIC-99 for these prior acts, as he

Table 3 Case Subject's Risk Assessment Score Using the RRASOR in Three Different States⁵⁵

Risk factor	Texas	Maryland	South Carolina
Prior sex offenses	1	3	3
Young (age 18–25) at release	0	0	0
Any male victim	0	0	0
Any related victim	0	0	0
Total score	1	3	3
Ten-year predicted sexual recidivism risk	11.2%	36.9%	36.9%

Table 4 Case Subject's Risk Assessment Score Using the STATIC-99 in Three Different States⁵⁹

Risk factor	Texas	Maryland	South Carolina
Young (18–25)	0	0	0
Not lived with lover for at least two years	1	1	1
Index case includes nonsexual violence	0	0	0
Prior convictions of nonsexual violence	0	0	0
Prior sex offenses	1	3	3
Prior sentencing dates (excluding index)	0	1	1
Any convictions for noncontact sex offenses	0	0	0
Any unrelated victims	1	1	1
Any stranger victims	1	1	1
Any male victims	0	0	0
Total score	4	7	7
Ten-year predicted sexual recidivism risk	26%	52%	52%

would in Maryland or South Carolina. Because of this difference, in Texas his predicted sexual recidivism risk at 10 years would be 11.2 percent and 26 percent, according to the RRASOR and the STATIC-99, respectively. In Maryland or South Carolina his 10-year predicted sexual recidivism risk would be 36.9 percent and 52 percent on the RRASOR and the STATIC-99, respectively. Doubling his predicted risk on the STATIC-99 and more than tripling his predicted risk on the RRASOR is significant for forensic evaluators and court officials making determinations of placement and monitoring of individuals convicted of sexual offenses. It is a cause for concern that such drastic differences result from something arbitrary like the state in which an offense occurred. The broad range of punishment for these zoophilic offenses is also staggering. In Texas he might not receive any punishment for his actions. However, in South Carolina he could receive four felony convictions and 20 years in prison.⁴¹ In Maryland he could receive misdemeanor convictions, a maximum of 40 years in prison, or a fine of \$4000, or both.²⁷ This case example highlights the considerable differences in legislation between states.

Laws pertaining to zoophilic behavior may not be sufficient or appropriate as they are currently written. Many of the statutes remain under such titles as “sodomy,” “buggery,” and “crime against nature.” These terms are outdated and do not explicitly describe the sexual acts that are to be punished. Furthermore, human–human sexual interactions are sometimes mixed with descriptions of zoophilic acts, especially in the case of sodomy and buggery laws. Otto⁶⁰ has called for the modernization of these laws with revisions including clear, modern, and uniform defini-

tions of behaviors that result in an offense and the use of nomenclature such as “sexual assault of an animal” to help move beyond terms such as “buggery” and “sodomy” and to bring offenders under the sex offender registration laws in their states. He proposes the following language for such revised laws:

Sexual assault of an animal

1. A person commits the crime of Sexual Assault of an Animal if the person:
 - a. Touches or contacts, or causes an object or another person to touch or contact, the mouth, anus or sex organs of an animal for the purpose of arousing or gratifying the sexual desire of a person; or
 - b. Causes an animal to touch or contact, the mouth, anus or sex organs of an animal for the purpose of arousal or gratifying the sexual desire of a person.
2. Sexual assault of an animal is a [Class __ felony].
3. Sexual assault of an animal is a sex crime [Ref. 60, p 149].

If adopted by the states, Otto’s proposed changes could enable courts to more easily identify and convict offenders uniformly. Furthermore, classifying acts of bestiality as sex crimes may be a worthwhile goal for such legislation, given the developing knowledge about the relationship between zoophilia, other paraphilias, and violence.

Conclusion

Bestiality has been punished in the United States since the nation’s beginnings as a collection of colonies. At present, 31 states have laws punishing individuals for committing sexual acts with an animal. Though diverse in wording and potential penalties, these laws may help identify individuals at risk of committing sexually deviant or violent acts that affect humans, including other paraphilic behavior, child sexual abuse, and personal crimes such as rape, robbery, and assault. Some of these

laws remain poorly worded and vague and include provisions that punish “sodomy” between two consenting adults, which may make it more challenging to prosecute zoophilic offenders. Furthermore, variations between states can result in dramatically different predicted sexual recidivism risk for offenders, solely based on the state in which one performs a zoophilic act, which can have a serious impact on court officials’ placement and monitoring of offenders.

It is important that the courts and society at large be informed about the potential consequences of allowing zoophilic acts to go unrecognized. States without laws against bestiality may consider creating such statutes, and those with outdated laws should consider modifying their current statutes to reflect a more modern understanding of the behavior. Some states currently provide for individuals convicted of a zoophilic offense to undergo psychological assessment if deemed necessary by the court. Requiring psychological evaluations of zoophilic offenders may be beneficial in screening for other aberrant sexual behaviors and increase our limited knowledge regarding the risk that zoophilic offenders pose to other humans. Current literature is sparse and commonly involves small or Internet-based samples, which are generally less reliable. Also, most of the non-Internet-based studies have included forensic subjects solely, most of whom are incarcerated for reasons other than zoophilic offenses. Partly because of this, it is unclear what risk (if any) is posed by a “pure zoophile” whose sexual deviancy extends only to animal victims and not to humans. Furthermore, our ability to define subtypes of zoophilia continues to develop, but it does not presently account for clinically significant differences in sexual interest. By furthering our knowledge on zoophiles and the breadth of their aberrant sexual activity, forensic evaluators and court officials can make more reliable recommendations regarding zoophiles’ conviction, monitoring, and release back into the community.

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