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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. *10cr 29*
v. : DATE FILED: **FILED** JAN 14 2010
KENNETH SCHNEIDER : VIOLATIONS: 18 U.S.C. § 2423(b)
(traveling for the purpose of engaging
in sex with a minor - 1 count)
18 U.S.C. § 2421 (transporting a person
for criminal sexual conduct - 1 count)

FILED
JAN 14 2010
MICHAEL E. KUNZ, Clerk
By *[Signature]* Dep. Clerk

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, defendant KENNETH SCHNEIDER was a citizen of the United States. SCHNEIDER was born in September 1964. SCHNEIDER is the founder and president of the Apogee Foundation, which purports to provide scholarships and assistance to children around the world who show an aptitude in the fine arts.

2. In 1998, in Moscow, Russia, defendant KENNETH SCHNEIDER, an attorney, was acquainted with N.D. and T.D., husband and wife whose names are known to the grand jury, who were ballet instructors at the Moscow State Academy of Choreography. SCHNEIDER was a self-described philanthropist who was willing to provide "assistance" to students attending the Academy.

3. In the summer of 1998, N.D. and T.D. introduced defendant KENNETH SCHNEIDER to R.Z., whose name is known to the grand jury, and who at the time was 12 years old. R.Z. was born in March 1986. R.Z. had been removed from the Academy because his parents lived at a great distance from the Academy and could not afford to pay his board.

A TRUE COPY CERTIFIED TO FROM THE RECORD
DATED: *1/22/10*
ATTEST: *[Signature]*
DEPUTY CLERK, UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

SCHNEIDER offered to pay for R.Z.'s board at the Academy. SCHNEIDER soon thereafter convinced R.Z.'s parents to let R.Z. live alone with SCHNEIDER at SCHNEIDER's apartment, which was within a few blocks of the Academy.

4. From the fall of 1998 until approximately 2004, R.Z. lived with SCHNEIDER, and SCHNEIDER engaged in a sexual relationship with R.Z. This included initially "grooming" him for sexual contact by touching him, kissing him, buying him gifts, and pressuring him to maintain the secrecy of the sexual relationship, and eventually involved SCHNEIDER engaging in oral and anal intercourse with R.Z.

5. In the summer of 2001, when R.Z. was 15 years old and SCHNEIDER was 36 years old, SCHNEIDER arranged for R.Z. to travel with him from Moscow, Russia to attend a summer program for ballet study at the Rock School in Philadelphia, Pennsylvania. Upon returning to Moscow, Russia in August 2001, SCHNEIDER continued his sexual relationship with R.Z., including engaging in oral and anal intercourse with R.Z.

6. On or about August 22, 2001, in the Eastern District of Pennsylvania and elsewhere, defendant

KENNETH SCHNEIDER,

a United States citizen, traveled in foreign commerce for the purpose of engaging in any sexual act as defined in Section 2246 with a person under 18 years of age that would be in violation of chapter 109A if the sexual act occurred in the special maritime and territorial jurisdiction of the United States in violation of 18 U.S.C. § 2423(b), to wit, defendant SCHNEIDER traveled from Philadelphia, Pennsylvania to Moscow, Russia, for the purpose of engaging in a sexual act with R.Z., a person who had reached the age of 12 but had not yet reached the age of 16, while

SCHNEIDER was at least four years older than R.Z., and the engaging in that act would have been a violation of Title 18, United States Code, Section 2243.

All in violation of Title 18, United States Code, Section 2423(b).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs one through six of Count One are incorporated herein by reference.
2. On or about August 22, 2001, in the Eastern District of Pennsylvania, and elsewhere, defendant

KENNETH SCHNEIDER

transported a person in foreign commerce with the intent that such person engage in any sexual activity for which any person can be charged with a criminal offense, to wit, defendant SCHNEIDER transported R.Z., a minor whose name is known to the grand jury, from Philadelphia, Pennsylvania to Moscow, Russia with the intent that R.Z., under compulsion based on R.Z.'s dependence on SCHNEIDER, engage in anal intercourse, which would be a violation of Article 133 of the Russian Criminal Code.

All in violation of Title 18, United States Code, Section 2421.

A TRUE BILL:



FOREPERSON



MICHAEL L. LEVY
United States Attorney