

COPY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x  
UNITED STATES OF AMERICA :

SEALED INDICTMENT

- v. -

13 Cr.

RICHARD DINIZO, :  
a/k/a "Rick," :  
a/k/a "Riccardo," :

Defendant. :

-----x

COUNT ONE

(Sexual Exploitation of a Child)

The Grand Jury charges:

1. In or about 2010, in the Southern District of New York, RICHARD DINIZO, the defendant unlawfully, willfully and knowingly employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and the defendant knew and had reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in or affecting interstate and foreign commerce and mailed, and such visual depiction was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means including by computer, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, to wit, RICHARD

DINIZO, the defendant, engaged in sexual activity in Westchester County, New York, with a girl under the age of eleven ("Victim-1") for the purpose of producing sexually-explicit videos of such activity.

(Title 18, United States Code, Section 2251(a).)

COUNT TWO

(Sexual Exploitation of a Child)

The Grand Jury further charges:

2. In or about 2009, in the Southern District of New York, RICHARD DINIZO, the defendant, unlawfully, willfully and knowingly employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and the defendant knew and had reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in or affecting interstate and foreign commerce and mailed, and such visual depiction was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means including by computer, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, to wit, RICHARD DINIZO, the defendant, engaged in sexual activity in Westchester County, New York, with a girl under the age of eleven

("Victim-2") for the purpose of producing sexually-explicit videos of such activity.

(Title 18, United States Code, Section 2251(a).)

COUNT THREE

(Sexual Exploitation of a Child)

The Grand Jury further charges:

3. In or about 2010, in the Southern District of New York, RICHARD DINIZO, the defendant, unlawfully, willfully and knowingly employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and the defendant knew and had reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in or affecting interstate and foreign commerce and mailed, and such visual depiction was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means including by computer, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, to wit, RICHARD DINIZO, the defendant, engaged in sexual activity in Westchester County, New York, with a girl under the age of eleven

("Victim-3") for the purpose of producing sexually-explicit videos of such activity.

(Title 18, United States Code, Section 2251(a).)

COUNT FOUR

(Sexual Exploitation of a Child)

The Grand Jury further charges:

4. In or about 2010, in the Southern District of New York, RICHARD DINIZO, the defendant, unlawfully, willfully and knowingly employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and the defendant knew and had reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in or affecting interstate and foreign commerce and mailed, and such visual depiction was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means including by computer, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, to wit, RICHARD DINIZO, the defendant, engaged in sexual activity in Westchester County, New York, with a girl under the age of eleven

("Victim-4") for the purpose of producing sexually-explicit videos of such activity.

(Title 18, United States Code, Section 2251(a).)

COUNT FIVE

(Sexual Exploitation of a Child)

The Grand Jury further charges:

5. In or about Spring 2008, in the Southern District of New York, RICHARD DINIZO, the defendant, unlawfully, willfully and knowingly employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and the defendant knew and had reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in or affecting interstate and foreign commerce and mailed, and such visual depiction was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means including by computer, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, to wit, RICHARD DINIZO, the defendant, engaged in sexual activity in Westchester County, New York, with a girl under the age of eleven

("Victim-5") for the purpose of producing sexually-explicit videos of such activity.

(Title 18, United States Code, Section 2251(a).)

COUNT SIX

(Child Pornography)

The Grand Jury further charges:

6. Between in or about 2010 and in or about August 2011, in the Southern District of New York and elsewhere, RICHARD DINIZO, the defendant, knowingly mailed, transported and shipped, using means and facilities of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, child pornography, to wit, DINIZO transported videos depicting DINIZO engaging in sexual activity with minors to recipients outside of New York.

(Title 18, United States Code, Sections 2252A(a)(1) and (b)(1).)



*Preet Bharara*

PREET BHARARA  
United States Attorney

United States District Court

SOUTHERN DISTRICT OF NEW YORK

THE UNITED STATES OF AMERICA

vs.

**RICHARD DINIZO,**  
a/k/a "Rick,"  
a/k/a "Riccardo,"

**Defendant.**

INDICTMENT

13 Cr.

(In Violation of Title 18, United States Code, Sections 2251(a) and 2252A(a)(1) and (b)(1))

**PREET BHARARA**

United States Attorney.

**A TRUE BILL**

