

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :
 :
 : SUPERSEDING INFORMATION
 :
 - v. - :
 :
 : S1 13 Cr. 306 (VB)
 RICHARD DINIZO, :
 :
 Defendant. :
-----X

COUNT ONE

(Sexual Exploitation of a Child)

The United States Attorney 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 United States Attorney 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 United States Attorney 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 United States Attorney further charges:

4. 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-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 United States Attorney further charges:

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

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

COUNT SIX

(Sexual Exploitation of a Child)

The United States Attorney further charges:

6. 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 SEVEN

(Sexual Exploitation of a Child)

The United States Attorney further charges:

7. 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-6") for the purpose of producing sexually-explicit videos of such activity.

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

COUNT EIGHT

(Sexual Exploitation of a Child)

The United States Attorney further charges:

8. 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-1") for the purpose of producing sexually-explicit videos of such activity.

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

COUNT NINE

(Sexual Exploitation of a Child)

The United States Attorney further charges:

9. In or about 2007 , 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-7") for the purpose of producing sexually-explicit videos of such activity.

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

COUNT TEN

(Sexual Exploitation of a Child)

The United States Attorney further charges:

10. 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-2") for the purpose of producing sexually-explicit videos of such activity.

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

COUNT ELEVEN

(Sexual Exploitation of a Child)

The United States Attorney further charges:

11. 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-2") for the purpose of producing sexually-explicit videos of such activity.

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

COUNT TWELVE

(Child Pornography)

The United States Attorney further charges:

12. 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
United States Attorney