

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

THE PEOPLE OF THE STATE OF NEW YORK

-against-

ROBERT STUART,  
SUSANNE STUART,  
PATRICK READ,  
EXTENSION SOFTWARE, INC.,

Defendants.

The defendants, acting in concert, committed the crime of PROMOTING GAMBLING IN THE FIRST DEGREE, in violation of Penal Law § 225.10(1), as follows:

The defendants, from on or about September 7, 2008 through on or about June 30, 2011, in the County of New York and elsewhere, knowingly advanced and profited from unlawful gambling activity by engaging in bookmaking to the extent that they received and accepted in any one day more than five bets totaling more than five thousand dollars.

CYRUS R. VANCE, JR.  
District Attorney