

**CRIMINAL COURT OF THE CITY OF NEW YORK  
COUNTY OF NEW YORK**

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THE PEOPLE OF THE STATE OF NEW YORK  
-against-

FELONY  
ADA IVERSON

**1. Louise Neathway (F 35)**

Defendant.

Mark Stewart, of an address known to the District Attorney's Office, states as follows:

At the times and places described below in the County and State of New York, the defendant committed the offenses of:

1. PL155.35(1) Grand Larceny in the Third Degree  
(2 counts)
2. PL110/155.35(1) Attempted Grand Larceny in the Third Degree  
(2 counts)
3. PL240.30(1)(a) Aggravated Harassment in the Second Degree  
(1 count)
4. PL120.45(1) Stalking in the 4th Degree-DNA-Eligible MISD  
(1 count)
5. PL120.45(2) Stalking in the 4th Degree-DNA-Eligible MISD  
(1 count)
6. PL240.30(2) Aggravated Harassment in the Second Degree  
(1 count)

the defendant stole property and the value of the property exceeded three thousand dollars; the defendant attempted to steal property and the value of the property exceeded three thousand dollars; the defendant, with intent to harass, annoy, threaten and alarm another person, communicated with a person, anonymously and otherwise, by telephone, by telegraph, and by mail, and by transmitting and delivering any other form of written communication, in a manner likely to cause annoyance and alarm; in that the defendant intentionally and for no legitimate purpose, engaged in a course of conduct directed at a specific person and knew and reasonably should have known that such conduct was likely to cause reasonable fear of material harm to the physical health, safety and property of such person; in that the defendant intentionally and for no legitimate purpose, engaged in a course of conduct directed at a specific person and knew and reasonably should have known that such conduct caused material harm to the mental and emotional

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health of such person, where such conduct consisted of following, telephoning and initiating communication and contact with such person and the defendant was previously clearly informed to cease that conduct; and the defendant, with intent to harass, annoy, threaten and alarm another person, made a telephone call with no purpose of legitimate communication.

The offenses were committed under the following circumstances:

I am an Investigator, shield 330, of the New York County District Attorney's Office Investigation Bureau and I am informed by an individual known to the District Attorney's Office that (i) informant knows the defendant and has met her before, in approximately April 2011, (ii) from that time the defendant repeatedly contacted the informant, and in response the informant told the defendant he wanted to cease all contact with her, (iii) informant changed his contact information in response to the defendant's repeated and frequent communications, (iv) in or about the Fall of 2011 the defendant asked the informant to pay for a medical procedure which would cost over \$15,000, (v) on multiple occasions the informant requested that the defendant stop her ongoing course of conduct, and (vi) in response, the defendant, on multiple occasions told the informant that if he did not provide money for her medical procedure and other support the defendant would contact the press and informant's family and assert facts that would subject the informant to ridicule and damage his personal relationships and professional reputation.

In response to the defendant's conduct and for the purported purpose of paying for a medical procedure, on January 18, 2012 the informant deposited \$4,000 into the defendant's bank account at a Chase Bank located at 1801 Second Avenue New York, New York and \$2,000 into the defendant's bank account at a Chase Bank located at 2030 Broadway New York, New York.

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On January 30, 2012 the informant received an email from the defendant in response to another attempt by informant to free himself of the defendant, that stated in part and substance: that the only resolution was that informant continue to financially support the defendant's medical procedures. I have reviewed documents from Google for the defendant's email address which show logon histories detailing the IP address used by the person accessing and using the said email account. The log on history for the defendant's said email shows that it was accessed over thirty (30) times between January 29, 2012 and January 31, 2012 using the same IP address. Further, I have reviewed documents provided by the internet service provider for the said IP address which show that the IP address belongs to 88 Leonard Street Apartment [REDACTED] New York, New York, the defendant's address.

Between January 29, 2012 and January 31, 2012 the defendant made multiple harassing telephone calls to the informant.

I am informed by the informant that on or about January 30, 2012 the informant received a voicemail from the defendant discussing her proposal and threatening to contact the press.

On many occasions between April 2011 and January 2012 the defendant has called and texted the informant hundreds of times, sometimes calling and texting over ten times in one night. On January 31, 2012 the informant was in New York County and received multiple texts from the defendant.

Deponent is further informed that the defendant has threatened physical harm to a person the informant knows, has contacted the said individual through several means of electronic communication, and has contacted and threatened to contact members of the informant's family.

The defendant's actions have caused the informant harm to his mental and emotional health, and annoyance and alarm.

**False statements made herein are punishable as a class A misdemeanor pursuant to section 210.45 of the penal law.**

Mark Stewart  
Deponent

2-2-12 4:44pm  
Date and Time