

INDICTMENT

SUPREME COURT OF THE STATE OF NEW YORK

COUNTY OF NASSAU

-----X  
THE PEOPLE OF THE STATE OF NEW YORK

-against-

MARC HENRY MENARD,  
AKA MARC MENARD,  
AKA MARCO,

FILED:  
INDICTMENT NO. 71924/2025

Defendant.

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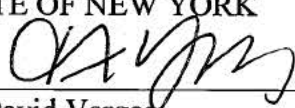
COUNTS

P.L. § 155.40(1)	GRAND LARCENY IN THE SECOND DEGREE (COUNTS 1-2)
P.L. § 155.35(1)	GRAND LARCENY IN THE THIRD DEGREE (COUNTS 3-11)
G.B.L. § 352-c(6)	VIOLATION OF GENERAL BUSINESS LAW SECTION 352- c(6) ARTICLE 23-A (COUNTS 12-22 )
P.L. § 190.65(1)(b)	SCHEME TO DEFRAUD IN THE FIRST DEGREE (COUNT 23)
P.L. § 175.10	FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE (COUNT 24)

A TRUE BILL

  
FOREPERSON OF THE GRAND JURY

LETITIA JAMES  
ATTORNEY GENERAL  
STATE OF NEW YORK

By:   
David Vargas  
Assistant Attorney General

### **COUNT ONE**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, accuses the defendant MARC HENRY MENARD of the crime of GRAND LARCENY IN THE SECOND DEGREE, in violation of Section 155.40(1) of the Penal Law, committed as follows:

The defendant, between on or about July 1, 2021 and May 9, 2022, in the County of Nassau and elsewhere, stole property having an aggregate value exceeding fifty thousand dollars from [REDACTED]

### **COUNT TWO**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, accuses the defendant MARC HENRY MENARD of the crime of GRAND LARCENY IN THE SECOND DEGREE, in violation of Section 155.40(1) of the Penal Law, committed as follows:

The defendant, between on or about March 22, 2022 and May 18, 2022, in the County of Nassau and elsewhere, stole property having an aggregate value exceeding fifty thousand dollars from [REDACTED]

### **COUNT THREE**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, accuses the defendant MARC HENRY MENARD of the crime of GRAND LARCENY IN THE THIRD DEGREE, in violation of Section 155.35(1) of the Penal Law, committed as follows:

The defendant, between on or about October 29, 2021 and October 17, 2022, in the County of Nassau and elsewhere, stole property having an aggregate value exceeding three thousand dollars from [REDACTED]

### **COUNT FOUR**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, accuses the defendant MARC HENRY MENARD of the crime of GRAND LARCENY IN THE THIRD DEGREE, in violation of Section 155.35(1) of the Penal Law, committed as follows:

The defendant, between on or about December 2, 2021 and August 5, 2022, in the County of Nassau and elsewhere, stole property having an aggregate value exceeding three thousand dollars from [REDACTED]

### **COUNT FIVE**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, accuses the defendant MARC HENRY MENARD of the crime of GRAND LARCENY IN THE THIRD DEGREE, in violation of Section 155.35(1) of the Penal Law, committed as follows:

The defendant, between on or about January 5, 2022 and June 5, 2022, in the County of Nassau and elsewhere, stole property having an aggregate value exceeding three thousand dollars from [REDACTED]

### **COUNT SIX**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, accuses the defendant MARC HENRY MENARD of the crime of GRAND LARCENY IN THE THIRD DEGREE, in violation of Section 155.35(1) of the Penal Law, committed as follows:

The defendant, on or about January 31, 2022, in the County of Nassau and elsewhere, stole property having an aggregate value exceeding three thousand dollars from [REDACTED]

### **COUNT SEVEN**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, accuses the defendant MARC HENRY MENARD of the crime of GRAND LARCENY IN THE THIRD DEGREE, in violation of Section 155.35(1) of the Penal Law, committed as follows:

The defendant, between on or about February 14, 2022 and March 21, 2022, in the County of Nassau and elsewhere, stole property having an aggregate value exceeding three thousand dollars from [REDACTED]

### **COUNT EIGHT**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, accuses the defendant MARC HENRY MENARD of the crime of GRAND LARCENY IN THE THIRD DEGREE, in violation of Section 155.35(1) of the Penal Law, committed as follows:

The defendant, between on or about March 8, 2022 and April 14, 2022, in the County of Nassau and elsewhere, stole property having an aggregate value exceeding three thousand dollars from [REDACTED]

**COUNT NINE**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, accuses the defendant MARC HENRY MENARD of the crime of GRAND LARCENY IN THE THIRD DEGREE, in violation of Section 155.35(1) of the Penal Law, committed as follows:

The defendant, on or about April 14, 2022, in the County of Nassau and elsewhere, stole property having an aggregate value exceeding three thousand dollars from [REDACTED]

**COUNT TEN**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, accuses the defendant MARC HENRY MENARD of the crime of GRAND LARCENY IN THE THIRD DEGREE, in violation of Section 155.35(1) of the Penal Law, committed as follows:

The defendant, on or about April 20, 2022, in the County of Nassau and elsewhere, stole property having an aggregate value exceeding three thousand dollars from [REDACTED]

**COUNT ELEVEN**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, accuses the defendant MARC HENRY MENARD of the crime of GRAND LARCENY IN THE THIRD DEGREE, in violation of Section 155.35(1) of the Penal Law, committed as follows:

The defendant, on or about August 26, 2022, in the County of Nassau and elsewhere, stole property having an aggregate value exceeding three thousand dollars from [REDACTED]

**COUNT TWELVE**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, accuses the defendant MARC HENRY MENARD of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, between on or about July 1, 2021 and May 9, 2022, in the County of Nassau and elsewhere, intentionally engaged in fraud, deception, concealment, suppression, false pretense or fictitious or pretended purchase or sale, or made any material false representation, or statement with intent to deceive or defraud, while engaged in inducing or promoting the issuance, distribution, exchange, sale, negotiation, or purchase within and from this state of any securities or commodities, as defined in Article 23 of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED]

### **COUNT THIRTEEN**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, accuses the defendant MARC HENRY MENARD of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, between on or about March 22, 2022 and May 18, 2022, in the County of Nassau and elsewhere, intentionally engaged in fraud, deception, concealment, suppression, false pretense or fictitious or pretended purchase or sale, or made any material false representation, or statement with intent to deceive or defraud, while engaged in inducing or promoting the issuance, distribution, exchange, sale, negotiation, or purchase within and from this state of any securities or commodities, as defined in Article 23 of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED]

### **COUNT FOURTEEN**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, accuses the defendant MARC HENRY MENARD of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, between on or about October 29, 2021 and October 17, 2022, in the County of Nassau and elsewhere, intentionally engaged in fraud, deception, concealment, suppression, false pretense or fictitious or pretended purchase or sale, or made any material false representation, or statement with intent to deceive or defraud, while engaged in inducing or promoting the issuance, distribution, exchange, sale, negotiation, or purchase within and from this state of any securities or commodities, as defined in Article 23 of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED]

### **COUNT FIFTEEN**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, accuses the defendant MARC HENRY MENARD of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, between on or about December 2, 2021 and August 5, 2022, in the County of Nassau and elsewhere, intentionally engaged in fraud, deception, concealment, suppression, false pretense or fictitious or pretended purchase or sale, or made any material false representation, or

statement with intent to deceive or defraud, while engaged in inducing or promoting the issuance, distribution, exchange, sale, negotiation, or purchase within and from this state of any securities or commodities, as defined in Article 23 of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED]

**COUNT SIXTEEN**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, accuses the defendant MARC HENRY MENARD of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, between on or about January 5, 2022 and June 5, 2022, in the County of Nassau and elsewhere, intentionally engaged in fraud, deception, concealment, suppression, false pretense or fictitious or pretended purchase or sale, or made any material false representation, or statement with intent to deceive or defraud, while engaged in inducing or promoting the issuance, distribution, exchange, sale, negotiation, or purchase within and from this state of any securities or commodities, as defined in Article 23 of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED]

**COUNT SEVENTEEN**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, accuses the defendant MARC HENRY MENARD of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, on or about January 31, 2022, in the County of Nassau and elsewhere, intentionally engaged in fraud, deception, concealment, suppression, false pretense or fictitious or pretended purchase or sale, or made any material false representation, or statement with intent to deceive or defraud, while engaged in inducing or promoting the issuance, distribution, exchange, sale, negotiation, or purchase within and from this state of any securities or commodities, as defined in Article 23 of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED]



### **COUNT EIGHTEEN**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, accuses the defendant MARC HENRY MENARD of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, between on or about February 14, 2022 and March 21, 2022, in the County of Nassau and elsewhere, intentionally engaged in fraud, deception, concealment, suppression, false pretense or fictitious or pretended purchase or sale, or made any material false representation, or statement with intent to deceive or defraud, while engaged in inducing or promoting the issuance, distribution, exchange, sale, negotiation, or purchase within and from this state of any securities or commodities, as defined in Article 23 of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED]

### **COUNT NINETEEN**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, accuses the defendant MARC HENRY MENARD of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, between on or about March 8, 2022 and April 14, 2022, in the County of Nassau and elsewhere, intentionally engaged in fraud, deception, concealment, suppression, false pretense or fictitious or pretended purchase or sale, or made any material false representation, or statement with intent to deceive or defraud, while engaged in inducing or promoting the issuance, distribution, exchange, sale, negotiation, or purchase within and from this state of any securities or commodities, as defined in Article 23 of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED]

### **COUNT TWENTY**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, accuses the defendant MARC HENRY MENARD of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, on or about April 14, 2022, in the County of Nassau and elsewhere, intentionally engaged in fraud, deception, concealment, suppression, false pretense or fictitious or pretended purchase or sale, or made any material false representation, or statement with intent to deceive or defraud, while engaged in inducing or promoting the issuance, distribution, exchange, sale, negotiation,

or purchase within and from this state of any securities or commodities, as defined in Article 23 of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED]

**COUNT TWENTY-ONE**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, accuses the defendant MARC HENRY MENARD of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, on or about April 20, 2022, in the County of Nassau and elsewhere, intentionally engaged in fraud, deception, concealment, suppression, false pretense or fictitious or pretended purchase or sale, or made any material false representation, or statement with intent to deceive or defraud, while engaged in inducing or promoting the issuance, distribution, exchange, sale, negotiation, or purchase within and from this state of any securities or commodities, as defined in Article 23 of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED]

**COUNT TWENTY-TWO**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, accuses the defendant MARC HENRY MENARD of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, on or about August 26, 2022, in the County of Nassau and elsewhere, intentionally engaged in fraud, deception, concealment, suppression, false pretense or fictitious or pretended purchase or sale, or made any material false representation, or statement with intent to deceive or defraud, while engaged in inducing or promoting the issuance, distribution, exchange, sale, negotiation, or purchase within and from this state of any securities or commodities, as defined in Article 23 of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED]

**COUNT TWENTY-THREE**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, accuses the defendant MARC HENRY MENARD of the crime of SCHEME TO DEFRAUD IN THE FIRST DEGREE, in violation of Section 190.65(1)(b) of the Penal Law, committed as follows:



The defendant, between on or about July 15, 2020 and June 5, 2023, in the County of Nassau and elsewhere, engaged in a scheme constituting a systematic ongoing course of conduct with intent to defraud more than one person or to obtain property from more than one person by false or fraudulent pretenses, representations or promises, and so obtained property with a value in excess of one thousand dollars from one or more such persons.

**COUNT TWENTY-FOUR**

THE GRAND JURY OF NASSAU COUNTY, by this indictment, accuses the defendant MARC HENRY MENARD of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, in violation of Section 175.10 of the Penal Law, committed as follows:

The defendant, on or about July 15, 2020, in the County of Nassau and elsewhere, with intent to defraud that includes an intent to commit another crime or conceal the commission thereof, he made or caused a false entry in the business records of an enterprise, to wit: Customer and Margin Agreements filed with [REDACTED]

LETITIA JAMES

Attorney General  
New York State

IND. NO.

71924-25

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SUPREME COURT: COUNTY OF NASSAU: STATE OF NEW YORK

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THE PEOPLE OF THE STATE OF NEW YORK

-against-

MARC HENRY MENARD,  
AKA MARC MENARD,  
AKA MARCO,

Defendant.

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LETITIA JAMES  
Attorney General of the State of New York

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INDICTMENT FOR:

P.L. § 155.40(1)	GRAND LARCENY IN THE SECOND DEGREE (COUNTS 1-2)
P.L. § 155.35(1)	GRAND LARCENY IN THE THIRD DEGREE (COUNTS 3-11)
G.B.L. § 352-c(6)	VIOLATION OF GENERAL BUSINESS LAW SECTION 352-c(6) ARTICLE 23-A (COUNTS 12-22)
P.L. § 190.65(1)(b)	SCHEME TO DEFRAUD IN THE FIRST DEGREE (COUNT 23)
P.L. § 175.10	FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE (COUNT 24)

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A TRUE BILL

Foreperson