

INDICTMENT

COUNTY COURT OF THE STATE OF NEW YORK

COUNTY OF MADISON

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

-against-

FILED:  
INDICTMENT NO. 30164 -25

MILES BURTON MARSHALL,  
AKA M. BURTON MARSHALL,  
AKA BURT MARSHALL,

Defendant.

-----X

COUNTS

P.L. § 155.40(1)	GRAND LARCENY IN THE SECOND DEGREE (21 COUNTS)
P.L. § 155.35(1)	GRAND LARCENY IN THE THIRD DEGREE (3 COUNTS)
G.B.L. § 352-c(6)	VIOLATION OF GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A (24 COUNTS)
P.L. § 190.65(1)(b)	SCHEME TO DEFRAUD IN THE FIRST DEGREE (1 COUNT)

**COUNT ONE**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime 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 January 1, 2016 and June 14, 2022, in the County of Madison and elsewhere, stole property having an aggregate value exceeding fifty thousand dollars from [REDACTED]

**COUNT TWO**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime 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 January 1, 2016 and September 27, 2022, in the County of Madison and elsewhere, stole property having an aggregate value exceeding fifty thousand dollars from [REDACTED]

**COUNT THREE**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime 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 January 1, 2016 and January 27, 2023, in the County of Madison and elsewhere, stole property having an aggregate value exceeding fifty thousand dollars from [REDACTED]

**COUNT FOUR**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime 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 January 1, 2016 and January 30, 2023, in the County of Madison and elsewhere, stole property having an aggregate value exceeding fifty thousand dollars from [REDACTED]

**COUNT FIVE**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime 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 February 1, 2016 and November 5, 2022, in the County of Madison and elsewhere, stole property having an aggregate value exceeding fifty thousand dollars from [REDACTED].

**COUNT SIX**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime 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 November 1, 2016 and February 11, 2020, in the County of Madison and elsewhere, stole property having an aggregate value exceeding fifty thousand dollars from [REDACTED].

**COUNT SEVEN**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime 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 November 29, 2016 and December 22, 2022, in the County of Madison and elsewhere, stole property having an aggregate value exceeding fifty thousand dollars from [REDACTED].

**COUNT EIGHT**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime 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 October 17, 2017 and February 6, 2020, in the County of Madison and elsewhere, stole property having an aggregate value exceeding fifty thousand dollars from [REDACTED].

**COUNT NINE**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime 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 9, 2018 and January 5, 2023, in the County of Madison and elsewhere, stole property having an aggregate value exceeding fifty thousand dollars from [REDACTED].

**COUNT TEN**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime 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 November 7, 2018 and December 12, 2022, in the County of Madison and elsewhere, stole property having an aggregate value exceeding fifty thousand dollars from [REDACTED].

**COUNT ELEVEN**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime 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 May 17, 2019 and August 17, 2021, in the County of Madison and elsewhere, stole property having an aggregate value exceeding fifty thousand dollars from [REDACTED].

**COUNT TWELVE**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime 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 May 3, 2021 and January 5, 2023, in the County of Madison and elsewhere, stole property having an aggregate value exceeding fifty thousand dollars from [REDACTED].

**COUNT THIRTEEN**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime 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 September 7, 2021 and April 25, 2022, in the County of Madison and elsewhere, stole property having an aggregate value exceeding fifty thousand dollars from [REDACTED].

**COUNT FOURTEEN**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime 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 December 22, 2021 and September 19, 2022, in the County of Madison and elsewhere, stole property having an aggregate value exceeding fifty thousand dollars from [REDACTED].

**COUNT FIFTEEN**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime GRAND LARCENY IN THE SECOND DEGREE, in violation of Section 155.40(1) of the Penal Law, committed as follows:

The defendant, on or about February 16, 2022, in the County of Madison and elsewhere, stole property having an aggregate value exceeding fifty thousand dollars from [REDACTED].

**COUNT SIXTEEN**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime GRAND LARCENY IN THE SECOND DEGREE, in violation of Section 155.40(1) of the Penal Law, committed as follows:

The defendant, on or about February 23, 2022, in the County of Madison and elsewhere, stole property having an aggregate value exceeding fifty thousand dollars from [REDACTED].

**COUNT SEVENTEEN**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime GRAND LARCENY IN THE SECOND DEGREE, in violation of Section 155.40(1) of the Penal Law, committed as follows:

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

**COUNT EIGHTEEN**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime 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 May 4, 2022 and January 13, 2023, in the County of Madison and elsewhere, stole property having an aggregate value exceeding fifty thousand dollars from [REDACTED].

**COUNT NINETEEN**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime 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 May 24, 2022 and July 6, 2022, in the County of Madison and elsewhere, stole property having an aggregate value exceeding fifty thousand dollars from [REDACTED].

**COUNT TWENTY**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime GRAND LARCENY IN THE SECOND DEGREE, in violation of Section 155.40(1) of the Penal Law, committed as follows:

The defendant, on or about September 7, 2022, in the County of Madison and elsewhere, stole property having an aggregate value exceeding fifty thousand dollars from [REDACTED].

**COUNT TWENTY-ONE**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime GRAND LARCENY IN THE SECOND DEGREE, in violation of Section 155.40(1) of the Penal Law, committed as follows:

The defendant, on or about October 28, 2022, in the County of Madison and elsewhere, stole property having an aggregate value exceeding fifty thousand dollars from [REDACTED].

**COUNT TWENTY-TWO**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime 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 November 17, 2022, in the County of Madison and elsewhere, stole property having an aggregate value exceeding fifty thousand dollars from [REDACTED].

**COUNT TWENTY-THREE**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL 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 Madison and elsewhere, stole property having an aggregate value exceeding three thousand dollars from [REDACTED].

**COUNT TWENTY-FOUR**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL 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 November 23, 2022, in the County of Madison and elsewhere, stole property having an aggregate value exceeding three thousand dollars from [REDACTED].



**COUNT TWENTY-FIVE**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, between on or about January 1, 2016 and June 14, 2022, in the County of Madison 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-A of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED].

**COUNT TWENTY-SIX**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, between on or about January 1, 2016 and September 27, 2022, in the County of Madison 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-A of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED].



**COUNT TWENTY-SEVEN**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, between on or about January 1, 2016 and January 27, 2023, in the County of Madison 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-A of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED].

**COUNT TWENTY-EIGHT**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, between on or about January 1, 2016 and January 30, 2023, in the County of Madison 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-A of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED].

**COUNT TWENTY-NINE**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, between on or about February 1, 2016 and November 5, 2022, in the County of Madison 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-A of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED].

**COUNT THIRTY**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, between on or about November 1, 2016 and February 11, 2020, in the County of Madison 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-A of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED].

**COUNT THIRTY-ONE**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, between on or about November 29, 2016 and December 22, 2022, in the County of Madison 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-A of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED].

**COUNT THIRTY-TWO**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, between on or about October 17, 2017 and February 6, 2020, in the County of Madison 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-A of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED].

**COUNT THIRTY-THREE**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, between on or about March 9, 2018 and January 5, 2023, in the County of Madison 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-A of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED].

**COUNT THIRTY-FOUR**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, between on or about November 7, 2018 and December 12, 2022, in the County of Madison 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-A of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED].

**COUNT THIRTY-FIVE**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, between on or about May 17, 2019 and August 17, 2021, in the County of Madison 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-A of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED].

**COUNT THIRTY-SIX**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, between on or about May 3, 2021 and January 5, 2023, in the County of Madison 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-A of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED].

**COUNT THIRTY-SEVEN**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, between on or about September 7, 2021 and April 25, 2022, in the County of Madison 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-A of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED].

**COUNT THIRTY-EIGHT**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, between on or about December 22, 2021 and September 19, 2022, in the County of Madison 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-A of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED].

**COUNT THIRTY-NINE**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, on or about February 16, 2022, in the County of Madison 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-A of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED].

**COUNT FORTY**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, on or about February 23, 2022, in the County of Madison 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-A of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED].



**COUNT FORTY-ONE**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, on or about March 22, 2022, in the County of Madison 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-A of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED].

**COUNT FORTY-TWO**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, between on or about May 4, 2022 and January 13, 2023, in the County of Madison 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-A of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED].

**COUNT FORTY-THREE**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, between on or about May 24, 2022 and July 6, 2022, in the County of Madison 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-A of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED].

**COUNT FORTY-FOUR**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, on or about September 7, 2022, in the County of Madison 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-A of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED].

**COUNT FORTY-FIVE**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, on or about October 28, 2022, in the County of Madison 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-A of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED].

**COUNT FORTY-SIX**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, on or about November 17, 2022, in the County of Madison 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-A of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED].

**COUNT FORTY-SEVEN**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL 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 Madison 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-A of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED].

**COUNT FORTY-EIGHT**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL of the crime of GENERAL BUSINESS LAW SECTION 352-c(6), ARTICLE 23-A, committed as follows:

The defendant, on or about November 23, 2022, in the County of Madison 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-A of the General Business Law, and thereby wrongfully obtained property of a value in excess of two hundred fifty dollars from [REDACTED].

**COUNT FORTY-NINE**

THE GRAND JURY OF MADISON COUNTY, by this indictment, accuses the defendant MILES BURTON MARSHALL 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:

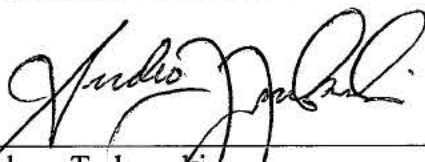
The defendant, between on or about January 1, 2016 and March 31, 2023, in the County of Madison and elsewhere, engaged in a scheme constituting a systematic ongoing course of conduct with intent to defraud more than one person or to obtain property from more than one person by false or fraudulent pretenses, representations or promises, and so obtained property with a value in excess of one thousand dollars from one or more such persons.

**A TRUE BILL**



LETITIA JAMES  
NEW YORK STATE  
ATTORNEY GENERAL

By:

  
\_\_\_\_\_  
Andrew Tarkowski  
Criminal Enforcement and  
Financial Crimes Bureau

IND. NO. 70164-25

SUPREME COURT: COUNTY OF MADISON: STATE OF NEW YORK

THE PEOPLE OF THE STATE OF NEW YORK

-against-

MILES BURTON MARSHALL  
AKA M. BURTON MARSHALL  
AKA BURT MARSHALL

Defendant.

LETITIA JAMES  
Attorney General of the State of New York

INDICTMENT FOR:

P.L. § 155.40(1)	GRAND LARCENY IN THE SECOND DEGREE (21 COUNTS)
P.L. § 155.35(1)	GRAND LARCENY IN THE THIRD DEGREE (3 COUNTS)
G.B.L. § 352-c(6)	VIOLATION OF GENERAL BUSINESS LAW
	SECTION 352-c(6), ARTICLE 23-A (24 COUNTS)
P.L. § 190.65(1)(b)	SCHEME TO DEFRAUD IN THE FIRST DEGREE (1 COUNT)

A TRUE BILL

Foreman