UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	Criminal No. 23cr10308
v.	Violation:
CONOR LAHIFF,	Count One: Unauthorized Damage to Protected Computers
Defendant	(18 U.S.C. §§ 1030(a)(5)(A), (c)(4)(B)(i))
	Forfeiture Allegation: (18 U.S.C. § 1030(i))

INFORMATION

At all times relevant to this Information:

General Allegations

- 1. CONOR LAHIFF worked as a desktop and network manager at a public high school in Essex County, Massachusetts ("the School"). By virtue of his employment, LAHIFF was authorized to access to various administrative systems on the School's internet-connected computer network.
 - 2. Employee A was the School's Director of Technology and Information Systems.
 - 3. Employee B was the School's information technology helpdesk clerk.
 - Security Vendor A managed the School's antivirus protection.
 <u>Lahiff Damaged the School's Computer Network without Authorization</u>
 - 5. On June 13, 2023, Whittier Tech terminated LAHIFF's employment.
 - 6. Following his termination, LAHIFF used his administrative privileges to:

- a. delete more than 1,200 Apple IDs from the School's Apple School Manager account—software that the School used to manage student, faculty, and staff information technology resources;
 - b. deactivate more than 1,400 other Apple accounts;
- c. attempt to disconnect other resources from the school's Apple School Manager account, including Apple Class IDs, Apple Course IDs, Apple Location IDs, and Apple Person IDs.
 - d. deactivate Employee A and Employee B's administrative accounts;
 - e. attempt to deactivate Employee A's user account;
- f. delete Employee A and Employee B's administrative accounts at Security Vendor A; and
- g. disable the School's private branch phone system, which resulted in internal and external phone service being unavailable at the School for approximately 24 hours.
 - 7. LAHIFF's actions caused the School at least \$5,000 in loss.

COUNT ONE

Unauthorized Damage to Protected Computers (18 U.S.C. § 1030(a)(5)(A), (c)(4)(B)(i), & (c)(4)(A)(i)(I))

The U.S. Attorney charges:

- 8. The U.S. Attorney re-alleges and incorporates by reference paragraphs 1 through 7 of this Information.
- 9. On or about June 13, 2023, in the District of Massachusetts and elsewhere, the defendant,

CONOR LAHIFF

did knowingly cause the transmission of a program, information, code, and command, and as a result of such conduct, intentionally cause damage without authorization to a protected computer, and loss to the School during any one-year period aggregating at least \$5,000 in value.

All in violation of Title 18, United State Code, Sections 1030(a)(5)(A), (c)(4)(B)(i), and (c)(4)(A)(i)(I).

FORFEITURE ALLEGATION (18 U.S.C. § 1030(i))

The U.S. Attorney further alleges:

10. Upon conviction of the offense in violation of Title 18, United States Code, Section 1030(a)(5)(A), set forth in Count 1 of this Indictment, the defendant,

CONOR LAHIFF

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1030(i), any property constituting or derived from such offense, any proceeds obtained, directly or indirectly, as a result of such offense; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense.

Respectfully submitted this _____ day of November, 2023.

JOSHUA S. LEVY Acting United States Attorney

MACKENZIE A. QUEENIN

ASSISTANT U.S. ATTORNEY