

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	<u>SUPERSEDING</u>
	:	<u>INFORMATION</u>
- v. -	:	S1 19 Cr. 796
RICHARD LIRIANO,	:	(LAK)
	:	
Defendant.	:	
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COUNT ONE

(Computer Intrusion - Intentionally Damaging Computers)

The United States Attorney charges:

1. From at least in or about 2013, up to and including at least in or about 2018, in the Southern District of New York and elsewhere, RICHARD LIRIANO, the defendant, knowingly and willfully caused the transmission of a program, information, code, and command, and as a result of such conduct, intentionally caused damage without authorization to a protected computer, and caused loss to one and more persons during any one-year period aggregating at least \$5,000 in value, and caused damage affecting 10 or more protected computers during any one-year period, to wit, LIRIANO installed keylogger software without authorization on computers at a hospital where he was employed, collected

employees' user names and passwords, and obtained personal and confidential information from e-mail accounts, file storage, and other accounts belonging to the hospital's employees and other related persons.

(Title 18, United States Code,
Sections 1030(a)(5)(A), 1030(c)(4)(B)(i), 1030(c)(4)(A)(i)(I)
and (VI) and 2.)

FORFEITURE ALLEGATION

2. As a result of committing the offense alleged in Count One of this Information, RICHARD LIRIANO, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1030(i), any and all property, real or personal, constituting or derived from, any proceeds obtained directly or indirectly, as a result of said offense, and any and all personal property that was used or intended to be used to commit or to facilitate the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Asset Provision

3. If any of the above-described forfeitable property, as a result of any act or omission of RICHARD LIRIANO, the defendant:

(1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to, or deposited with, a third person;

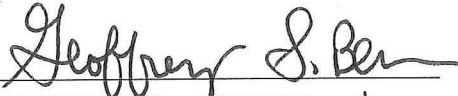
(3) has been placed beyond the jurisdiction of the Court;

(4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 1030, Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461.)



GEOFFREY S. BERMAN TH
United States Attorney

