

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 15-CR-20383-UNGARO**

**UNITED STATES OF AMERICA,**

**vs.**

**CRISTINA ALONSO,**

**Defendant.**

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**AGREED FACTUAL BASIS FOR GUILTY PLEA**

Beginning in or around March 2008, and continuing until in or around at least September 2010, the defendant, Cristina Alonso (“C. Alonso” or the “defendant”), knowingly and willfully conspired and agreed with others to commit health care fraud, in violation of 18 U.S.C. § 1349. During this same time period, the defendant also knowingly and willfully conspired and agreed with others to make false statements related to health care matters, in violation of 18 U.S.C. § 371. Medicare is a “health care benefit program” of the United States, as defined in 18 U.S.C. § 24. Furthermore, Medicare is a health care benefit program affecting commerce.

The defendant was a registered clinical social worker intern who worked as a therapist at R&S Community Mental Health, Inc. (“R&S”). The defendant would periodically substitute for other therapists working at St. Theresa Community Mental Health Center, Inc. (“St. Theresa”). R&S and St. Theresa (the “Clinics”) were community mental health centers which purported to provide partial hospitalization program (“PHP”) services to individuals suffering from mental illness in Miami-Dade County, Florida. In fact, the Clinics were operated for the purpose of

billing the Medicare Program for expensive PHP services that were not medically necessary and/or were not provided—a conspiracy which C. Alonso knowingly and willfully joined.


C. Alonso's primary role, among others, in the scheme involved, personally and with the assistance of others, preparing fabricated patient records, specifically group therapy session notes. Those notes did not accurately reflect the patients' statements, physical or mental conditions, or interactions with therapists, and in many instances had been prepared by unlicensed and unqualified individuals with no medical training. C. Alonso also prepared fabricated patient records for group therapy sessions reflecting that she had personally provided patients with therapy when, in fact, those group therapy sessions had been conducted by another individual who did not hold a license to practice therapy. In furtherance of the conspiracy, on or about June 18, 2010, C. Alonso endorsed check number 2711 in the approximate amount of \$1,820 drawn on the bank account of R&S, which funds constituted proceeds of the fraud perpetrated through R&S.

As a result C. Alonso's conduct, R&S submitted approximately \$7.3 million in false and fraudulent claims to Medicare, and was paid approximately \$2.8 million for those claims.

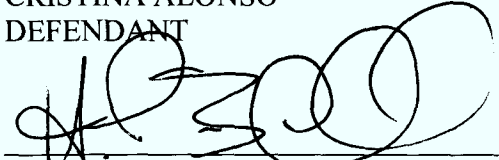
The preceding statement is a summary, made for the purpose of providing the Court with a factual basis for my guilty plea to the charges against me. It does not include all of the facts known to me concerning criminal activity in which I and others engaged.

I make this statement knowingly and voluntarily and because I am in fact guilty of the crimes charged.

DATE: 10/9/15

  
CRISTINA ALONSO  
DEFENDANT

DATE: 10/9/15

  
HENRY P. BELL, ESQ.  
COUNSEL FOR CRISTINA ALONSO