

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 :
 v. : Criminal No. 24-
 :
 MARIA P. COSENTINO : 18 U.S.C. §§ 1347 and 2

I N F O R M A T I O N

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

(Health Care Fraud)

1. At all times relevant to this Information:
 - a. Defendant MARIA P. COSENTINO resided in Garfield, New Jersey and was a licensed clinical social worker. COSENTINO owned and operated Bergen Alliance Mental Health and Wellness, located in Paramus, New Jersey (“Bergen Alliance”).
 - b. Bergen Alliance was a counseling center that provided counseling services and mental health treatment to children, families, couples, and adults.
 - c. Individual-1 through Individual-4 were purported patients at Bergen Alliance.
 - d. Individual-5 through Individual-7 were employees at Bergen Alliance.

e. “Private Health Insurance Company 1” had its principal place of business in New Jersey and was a “health care benefit program” affecting commerce as defined in 18 U.S.C. § 24(b).

The Health Care Fraud Scheme

2. From in or about October 2017 through in or about April 2023, in the District of New Jersey, and elsewhere, defendant

MARIA P. COSENTINO

knowingly and willfully executed and attempted to execute a scheme and artifice to defraud a health care benefit program, namely, Private Health Insurance Company 1, a health care benefit program as defined under Title 18, United States Code, Section 24(b), and to obtain, by means of false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of, said health care benefit program, in connection with the delivery of and payment for health care benefits, items, and services.

Goal of the Health Care Fraud Scheme

3. The goal of the scheme was for COSENTINO to profit by fraudulently submitting claims to health care benefit programs for services that were not provided.

Manner and Means of the Scheme to Defraud

4. The manner and means by which COSENTINO sought to accomplish the goal of the scheme to defraud included, among other things, the following:

a. COSENTINO submitted or caused to be submitted fraudulent claims to Private Health Insurance Company 1, and other health care benefit

programs, for counseling sessions at Bergen Alliance that did not take place. COSENTINO carried out this scheme by billing for counseling sessions that never happened in the following three ways: (i) billing for patients while they were outside the United States or had otherwise ceased receiving counseling services from Bergen Alliance; (ii) billing for individuals who never attended any counseling sessions at Bergen Alliance; and (iii) submitting months' worth of claims at a time for weekly counseling sessions that patients never attended.

b. After falsely billing health care benefit programs for the non-existent counseling sessions, COSENTINO received reimbursement payments from Private Health Insurance Company 1 and other health care benefit programs that she was not entitled to.

Claims For Patients Outside the United States and Former Patients

c. COSENTINO billed health insurance benefit plans for counseling sessions for patients who were either outside the United States at the time services were allegedly provided or had ceased receiving counseling from the practice at the time of billing. For example, from on or about July 3, 2019 to on or about July 19, 2019, Individual-1 and Individual-2—both patients of Bergen Alliance—traveled outside the United States. During that time, COSENTINO submitted or caused to be submitted 15 claims to Private Health Insurance Company 1 for counseling sessions for Individual 1 and Individual 2 while they were outside the United States and did not receive any counseling sessions.

d. Furthermore, Individual-1 did not attend counseling sessions at Bergen Alliance in 2023. Nevertheless, COSENTINO submitted or caused to be submitted 18 claims to Private Health Insurance Company 1 for counseling sessions purportedly provided to Individual-1 from on or about January 1, 2023 to on or about June 14, 2023.

e. Similarly, Individual-2 did not receive any counseling sessions at Bergen Alliance after approximately August 2022. Yet COSENTINO submitted or caused to be submitted 41 claims to Private Health Insurance Company 1 for counseling sessions purportedly provided to Individual-2 from on or about September 1, 2022 to on or about June 14, 2023.

Claims for Non-Existent Patients

f. COSENTINO also submitted or caused to be submitted claims for individuals who never received any counseling at Bergen Alliance and were never patients of the practice.

g. For example, Individual-7, an employee at Bergen Alliance, never received counseling services at Bergen Alliance, either before, during, or after Individual-7's employment there. However, beginning with a date of service of September 5, 2017, COSENTINO submitted or caused to be submitted approximately 222 claims for counseling services purportedly provided to Individual-7.

h. Additionally, beginning with a date of service of November 30, 2017, COSENTINO submitted or caused to be submitted approximately 27 claims to Private Health Insurance Company 1 for counseling services

purportedly provided to Individual-3, a purported patient at Bergen Alliance and a relative of Individual-7 (an employee at Bergen Alliance). But Individual-3 never received any counseling services from Bergen Alliance.

i. Similarly, beginning with a date of service of July 5, 2019, COSENTINO submitted or caused to be submitted approximately 11 claims to Private Health Insurance Company 1 for counseling services purportedly provided to Individual-4, a purported patient at Bergen Alliance and a relative of Individual-6 (an employee at Bergen Alliance). But Individual-4 never received any counseling services from Bergen Alliance.

Bulk Backdating of Claims

j. COSENTINO directed Individual-6, an employee at Bergen Alliance, to backdate and submit claims for months' worth of counseling sessions that never occurred.

k. For example, on or about September 29, 2022, COSENTINO directed Individual-6 to begin billing for two counseling sessions a week for certain patients in order to make enough money to keep the practice in business, even if those patients had not received two counseling sessions in a given week.

l. COSENTINO also directed Individual-6 to submit one year's worth of backdated claims at a time. For example, on or about July 15, 2022, COSENTINO directed Individual-6 to backdate and submit claims for counseling sessions for Individual-7 (an employee at Bergen Alliance) for the entire previous year even though Individual-7 never received any counseling sessions at Bergen Alliance.

m. COSENTINO also backdated claims for Individual-1 and Individual-2. In early 2022, COSENTINO directed Individual-6 to backdate nearly a year's worth of claims for both individuals even though neither individual was receiving weekly counseling from Bergen Alliance at that time.

In violation of Title 18, United States Code, Sections 1347 and 2.

FORFEITURE ALLEGATION

1. Upon conviction of the Federal health care offense as defined in 18 U.S.C. § 24 alleged in this Information, defendant MARIA P. COSENTINO shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(7), all property, real and personal, the defendant obtained that constitutes or is derived, directly and indirectly, from gross proceeds traceable to the commission of such offense.

Substitute Assets Provision

2. If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant(s) up to the value of the forfeitable property described above.



PHILIP R. SELLINGER
United States Attorney

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INFORMATION FOR

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