

**STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS**

STATE OF FLORIDA
DEPARTMENT OF HEALTH,
BOARD OF OSTEOPATHIC MEDICINE,
Petitioner,

vs.

Case Nos.: 2023-54547, 24-004162PL

HEIDI MARJAANA LAHTENMAA, D.O.,
Respondent.

MOTION TO DISMISS

INTRODUCTION:

Dear Honorable Administrative Law Judge,

I am Dr. Heidi Marjaana Lahtenmaa, a dual Finnish-American citizen, urgently requesting the dismissal of a case initiated by the Florida Department of Health (DOH) against my medical license (OS 16911). In January 2023, I exposed a disturbing mafia cybergang infiltration within Teladoc through whistleblowing, intensifying a likely existing U.S. investigation, as my whistleblowing propelled it to a critical new level. This act unleashed a relentless ordeal of cyberattacks, torture, and retaliation that has persisted for over 2.5 years and continues unabated. I have suffered unimaginable hardship, exacerbated by this lawsuit (Case Nos. 2023-54547, 24-004162PL), which unjustly labels me "delusional" for reporting these cyberattacks amid an already desperate situation.

Overseen by the Florida Department of Health (DOH) under Assistant General Counsel Michael Morris, this case is inherently retaliatory, constituting psychological torture, and breaches fundamental ethical and legal standards, making the proceedings baseless and unjust. The Fl DOH's actions are marred by egregious procedural abuses and life-threatening retaliation, ultimately driving me into exile in January 2025. Undeterred, the

Fl DOH extended their retaliatory efforts overseas, continuing their campaign online. The unrelenting psychological torment from the Fl DOH, combined with their retaliatory lawsuit and my severe anemia, triggered a life-threatening health crisis in Portugal. I was saved only by the prompt intervention of Polícia Judiciária and Interpol, who accepted my account as credible and ensured I received urgent medical care. Fl DOH's abuse of power has tarnished Florida's international reputation, demanding immediate accountability for this outrageous misconduct.

I am proceeding pro se, as all my efforts to secure legal representation have been obstructed or undermined, as demonstrated by the case of my former attorney, Mr. Burch, whose public website triggers alerts for child pornography (Exhibits 29-A to 29-C). Though the changes of dismissal seem slim, in the absence of legal counsel, I am fueled by an unyielding determination to combat this profound injustice. The gravity of these horrific actions by the Fl DOH, rooted in my whistleblowing on Teladoc Health Inc., necessitates immediate dismissal to safeguard my constitutional rights, professional career, and personal safety.

GROUND FOR DISMISSAL:

1. Lack of Valid Complaint and Initiation of Unfounded Case:

The DOH initiated this action without a valid complaint, violating Florida Statutes § 456.073(1). No original complaint from Dr. Robert Dahlin, DO, exists, as confirmed by Mr. Morris during December 10, 2024, deposition (Exhibit 16-A). This admission was omitted from the written transcript, and no audio exists, violating the 2-year retention mandate (§ 90.953) (Exhibit 16-B).

Dr. Robert Dahlin, DO, whose dad is a federal official, visited briefly on November 17–18, 2023. He failed to believe my hacking claims despite evidence. He later admitted hacking via texts on December 8, 2023, yet tried to coerce me to call the PRN with him, or he would report me (Exhibits 6-A to 6-H). I refused. Shockingly, DOH documents show a PRN letter warning of file closure and DOH referral sent on December 4, 2023, four days before Dahlin's ultimatum (Exhibit 4-A, 4-B). I was labeled as "noncompliant" by the PRN, without evaluation, contact, or notification, while I was out of the country in Finland from November 23, 2023, to January 23, 2024, with all mail returned. This baseless start, tied to my Teladoc whistleblowing, underpins a 2.5-year retaliatory campaign by the Fl DOH. To date, the DOH has not produced Dr. Dahlin's original complaint or a valid charge.

2. Neglect of Extensive Evidence:

Remarkably, every single entity and individual—DOH, Dr. Dahlin, Palm Beach Police, Delray Medical Center, and certain colleagues—who directly labeled me delusional astonishingly failed to review any evidence, despite their professional obligations. Instead, they hastily concluded I was delusional, a devastating label carrying severe consequences,

revealing a disturbing and uniform refusal to investigate. This pattern starkly undermines support for my whistleblowing against Teladoc, a major healthcare giant.

I specifically asked FL DOH on numerous occasions to investigate, or refer for a thorough forensic investigation, the extensive evidence—approximately 100,000 photos, 4 laptops, 5 hard drives, 15 cell phones, and over 10 diaries—documenting cyberattacks. They ignored my pleas. This unusual neglect, in context of being accused as “delusional”, “psychotic”, and/or “impaired”, suggests a deliberate refusal to investigate, especially when the APA’s Diagnostic and Statistical Manual (DSM-5-TR) and ethical guidelines (Standards 9.01, 2.01, 3.04) mandate a thorough evidence review before diagnosing delusions/psychosis. I was denied this, breaching diagnostic standards and rendering their labels invalid and violating my right to a fair process under Florida Statutes § 456.073(10).

Even more shocking is that FL DOH admitted hacking evidence yet shamelessly persisted in labeling me delusional. I requested secure communication via mailbox.org on February 16, 2024, a request acknowledged by Allis. The DOH refused to use mailbox.org, citing a “security measure” that “required management approval,” delaying communication until March 13, 2024, when I set up an automated redirect due to their reckless continued use of the hacked email (Exhibits 8-A to 8-I). Morris eventually shifted from “delusions” regarding hacking to “impaired” again without evidence. Morris’s complicity in this contradictory retaliation mirrors a fabricated felony prosecution, but without a charge.

Furthermore, Morris needlessly prolonged the investigation despite my February 3, 2024, letter urging FBI and attorney Jacob Tubbs verification of my Teladoc whistleblower claims and instead opted to systematically persecute me with false allegations.

Finally, I direct your attention to supportive letters from my neighbor and a relative, which refute the baseless accusations of “psychosis”, affirm the evident hacking and severe cyber torment, and call for government assistance against these cyberterrorists as well as whistleblower protections. Unaccountably, these letters, submitted to Stephen Burch, have been disregarded by the FL DOH throughout this proceeding.

3. Denial of the Initial Notification Package and Breach of Confidentiality:

The DOH breached confidentiality (Section 456.057) by sending my initial notification package (January 4, 2024, tracking number 70190140000058587250) to someone else. Per Mr. Morris’s email on February 21, 2024, “It was the US Post Office that delivered to a different address, and we would assume that was per your instruction,” wrongly blaming me and the USPS for his gross failures, and likely criminal activities (Exhibit 15-D). I was unaware of the investigation until January 12, 2024, when I accidentally found Allis’s email in my spam folder; thus, I could not have instructed the package to be sent to the wrong address (Exhibit 25-B). Morris refused to disclose the packet’s destination, risking exposure (24-A to 24-E).

However, per Allis Richardson's email on February 1, 2024, "Yes, the address we have on file and where the letter was mailed to is 3540 S. Ocean Blvd #805, Palm Beach, FL 33480" (Exhibit 25-A).

Adding to the confusion, the initial notification package tracks as "returned to sender" per USPS, which aligns with my absence from November 23, 2023, to January 23, 2024, during which all my mail was returned (Exhibit 5-A, 5-B, 5-C). As of now, I have yet to receive the initial notification package delivered through legally required methods under Florida law.

4. Denial of Case Materials:

On March 13, 2024, I requested proof of document delivery, but Allis Richardson refused, stating, "You won't gain access to it" obstructing my defense ((Exhibits 19-A to 19-F). Morris failed to ensure transparency, violating my due process rights.

Numerous materials beyond Dr. Dahlin's original complaint, including deposition audio and Dr. Treese's April 16, 2024, evaluation (not May 16, 2024, as falsified), are missing or altered, hindering my defense (Exhibits 9-A, 9-B). Dr. Treese's May 16, 2024, (incorrect date) eval is grossly altered and not an accurate representation. He agreed that I was hacked and not delusional, which is the exact opposite of what the altered evaluation states.

Furthermore, I was repeatedly denied access to the "complete investigative file." On May 19, 2025, Mr. Morris asserted that he had delivered "the full investigative file" to my attorney, Stephen Burch. After Mr. Burch and I parted ways on April 23, 2025, he sent me what he claimed was my "entire investigative file," but many critical documents are altered or missing, severely hindering my ability to prepare a defense in the ongoing Florida DOH case.

5. Coercion:

Morris engaged in conduct prejudicial to the administration of justice by aggressively attempting to coerce me into signing a confidentiality agreement (§ 456.073(10)) to access my investigative file, that I understood included the original complaint by Dr. Dahlin, stating, "If you do not return the agreement, we cannot send you the file", despite my objection that it was inapplicable without expert or patient records (Exhibits 15-A to 15-D). This blatant pressure tactic, akin to blackmail, aimed to force compliance and obstruct my fair defense, which I steadfastly refused.

6. Entrapment:

The DOH, under Morris, demanded a confidentiality agreement over a compromised network, setting a fraudulent trap to hold me accountable for breaches, thereby violating justice (Exhibits 15-A to 15-D).

7. Improper Service of Process:

Service of the "Order Compelling an Examination" was improperly executed by DOH investigator Ryan Bulley, with no authority under law to be delivering court documents, or any mail for that matter, violating Florida Statutes § 120.569(2)(c) and DOAH Rule 28-106.111. Mr. Morris and other FL DOH staff frequently coerced me to accept legal documents requiring "personal service" (Exhibits 20-A, 20-B), despite Mr. Morris acknowledging that "we are not the USPS" (Exhibit 11-D). The FL DOH continued to impersonate common carriers by delivering court papers, without using secure, verifiable methods like certified mail, to force acceptance of invalid documents.

Additionally, despite requests, Mr. Morris and FL DOH staff frequently delivered court documents using insecure email, contrary to the DOH policy against sending confidential information via email, endangering my case (Exhibit 19-A). To date, I have received no case documents with traceable proof of delivery or signature required.

8. Due Process Violations:

The DOH denied due process under Florida Statutes § 456.073(10) and Rule 28-106.111. I was denied a Probable Cause Panel hearing, despite it being a critical due process step I am entitled to, in determining whether there is sufficient evidence to proceed with a formal complaint. In addition, I was denied access to the full investigative file; e.g., the missing Dr. Treese evaluation from April 16, 2024, deposition audio transcript, Dr. Dahlin's original complaint, and more. Mr. Morris's refusal to provide these documents, despite requests, obstructs my defense. I was also denied secure communication despite hacking evidence (Exhibits 8-A to 8-I).

9. Retaliatory Misconduct and Whistleblower Endangerment:

This case is retaliatory under Florida Statutes § 456.0575, stemming from my January 2023 Teladoc whistleblowing against a global telehealth giant.

Mr. Morris threatened me on numerous occasions, stating, "you risk administrative complaint if you do not show up (for the examination), and I don't think you should take it lightly. I wish you best of luck" (Exhibit 10-B, 11-A). This coercive tactic, cloaked as a warning, was designed to intimidate me into compliance, prejudicing my defense and violating his duty to act impartially.

Michael Morris permitted Allis Richardson to send unsolicited emails threatening my license from her email account, which listed her number, 561-741-4580, as her official FL DOH business contact, yet Intelius identified it as belonging to Cynthia Begano (Exhibit 1-B, 1-C, 1-D). This raises serious questions about the validity of Allis Richardson's account, especially given the DOH's own policy against such threats (Exhibit 17). Morris's and Allis's deliberate silence on this matter is extremely concerning and warrants investigation and a criminal referral.

Shockingly, Morris emailed Teresa Culver at Tenet Health on April 28, 2025, with Zoom details for May 5, 2025, hearing, despite its link to my illegal Baker Act detention at Delray

Medical Center; Tenet facility (Exhibit 1-E). This suggests collusion, violating neutrality and risking fraudulent proceedings. I was Baker Acted on 08/12/24 by the Palm Beach Police for “delusions”, after reporting my health insurance cancellation by hackers to the FBI. The BA-52 was illegal and invalid, and I was held for 5 days without BA-32 and forced medications, violating due process rights under the U.S. Constitution (e.g., Fourth Amendment against unlawful seizure, Fourteenth Amendment for due process) and state statutes. All the evidence in my possession was ignored. At Delray, they ignored workup for my severe anemia (Hb 9.1 g/dL), which is perhaps not surprising given the personnel overlap with Teladoc (e.g., Eric Evans, former Tenet executive, on Teladoc’s board). Mr. Morris, by sharing my contact details with Tenet and possibly Teladoc, breached my confidentiality and placed me directly in harm’s way, likely fueling retaliatory actions against me and violating protections under Florida law. Post-discharge, all my medical appointments, including a breast lump biopsy, were cancelled at the last minute with contradictory excuses such as “the Doctor does not take new patients”, despite having requested my new patient files weeks prior.

The escalating severe retaliation, now with life-threatening consequences, and the ongoing relentless harassment, including doorstep demands and frequent calls despite involving my lawyer at the time, Mr. Burch, whom they were supposed to contact, drove my January 2025 exile and May 2025 crisis, requiring Polícia Judiciária and Interpol’s help to get medical care.

Even internationally, the FL DOH’s retaliation continues unabated. The FL DOH’s outrageous demands compel me to appear before an “Open” court on August 5-6, 2025, where “members of the public may observe” a proceeding, including invited criminal elements, resembling a modern-day Salem public lynching that signals a failure to maintain impartiality and ensure safety.

10. Fraudulent Practices and Evidence Tampering:

The DOH, under Mr. Morris, engaged in fraud by mislabeling a PRN form as the initial complaint (Exhibit 12-A to 12-D) and tampering with evidence (e.g., missing Treese eval for 04/16/24 date (Exhibit 9-B) and suppressed deposition audio (Exhibit 16-B)). In addition, Morris arrived with blank papers to my deposition on December 10, 2024, despite my notarized interrogatories submitted to Burch on November 19, 2024, while Burch withheld the copies. I was forced to resubmit all the information to Mr. Morris verbally during the deposition. Shockingly, Mr. Burch also prevented me from presenting any evidence to Mr. Morris, who then attempted to invalidate my record and verbally abused me by saying things like “I don’t believe you”, statements omitted from the written transcript. This collusion to force re-disclosure reeks of deceit, demanding sanctions and prejudicing my case.

11. Failure to tie the case to Social Security Numbers:

The DOH, under Morris’s deplorable oversight, failed to verify my identity or link Case Nos. 2023-54547, 24-004162PL to my SSNs despite the 2024 National Public Data breach (900 million SSNs) and RansomHub hack, and prior leaks like Equifax and Anthem, dismissing

my hacking reports (Exhibit 18). This violates due process (§ 456.073(10)), recordkeeping (§ 456.004), data protection (§ 501.171), and whistleblower protections (§ 456.0575).

What makes this even more alarming is that a second SSN was assigned to me, and my colleagues, at James A. Haley in 2016, further warranting investigation due to its relevance to my identity and case security.

12. Failure to verify 2 dates of issuance for OS 16911:

I reported two issuance dates for OS16911 to Morris on numerous occasions, and oddities when filing for my Florida license to Allis Richardson in 2024, including needing to file twice due to bypassed attestation questions (Exhibits 2-A to 2-F). I also raised concerns about free access to my account to anyone knowing my full name, DOB and SSN (Exhibits 3-A, 3-B). Morris failed to investigate, violating DOH's recordkeeping duty, whistleblower protections, and potentially undermining the case's legitimacy

13. Proliferation of Case Numbers:

Morris assigned multiple case numbers (2023-54547, 24-004162PL) to the same baseless case, a retaliatory tactic to confuse me without a verified complaint or proper service, bypassing a PCP hearing and ignoring hacking reports, exposing a fraudulent process.

14. Audacity of Impairment Allegation:

The audacity of the DOH's claim that I am "impaired" and unfit to practice medicine, while forcing me to act as my own lawyer—despite being anemic, recovering from a medical procedure, and having no legal training—is a cruel irony. This accusation, leveled as I battle them directly, exemplifies their retaliatory intent, exploiting my compromised state to silence my Teladoc whistleblowing. This further violates my due process rights under Florida Statutes § 456.073(10).

RELIEF SOUGHT:

I urgently request dismissal with prejudice, halting all proceedings. The DOH's violations—invalid complaint, improper service, denied due process, retaliation, fraud, and torture—threaten my license, livelihood, and life. This motion is filed pro se, with evidence attached, as legal representation remains unattainable amid this persecution.

CONCLUSION:

This is a deliberate over 2.5-year campaign of harassment, retaliation, and torture, proven by verifiable government records, driving me to exile and near death. The relentless psychological torment inflicted by the DOH, compounded by severe anemia, precipitated a critical health crisis in Portugal, from which I was rescued by swift intervention by Polícia

The FL DOH's outrageous claims demand me to defend myself pro se, as legal representation eludes me amidst this persecution, and to appear before an "Open" court on August 5 and 6, 2025, where "members of the public (with criminal elements invited) may observe" my testimony against Teladoc, cybergangs, organized crime/mafia, and others (Exhibit 14). My witnesses have withdrawn out of fear, a response I cannot fault them for, yet it undermines their assertion that I am merely "delusional". This impending event mirrors nothing less than a modern-day Salem witch trial; a public lynching escalated by the involvement of global corporations and organized crime, transforming a courtroom into a stage for vengeance and exposing systemic corruption. Permitting this trial signals a failure to maintain impartiality and ensure safety, potentially marking an unprecedented collapse of the justice system that shields a coordinated criminal conspiracy, tarnishing Florida's and the U.S. justice system's global reputation (Florida Statutes § 777.04).

Respectfully submitted,

Date: June 16, 2025

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Exhibits Attached:

Supportive letters (2):

File "Morris Burch": 1-A to 1-E, 2-A to 2-F, 3-A, 3-B, 4-A, 4-B, 5-A to 5-C, 6-A to 6-F, 7, 8-A to 8-I, 9-A, 9-B, 10-A to 10-C, 11-A to 11-F, 12-A to 12-D, 13, 14, 15-A to 15-D, 16-A to 16-B, 17, 18, 19-A to 19-F, 20-A, 20-B, 21-A, 21-B, 22, 23, 24-A to 24-E, 25-A, 25-B, 26, 27-A, 27-B, 28, 29-A to 29-C as referenced.