

**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.

NOTICE OF FILING EVIDENCE

TO: ALL PARTIES OF RECORD

I, Heidi Marjaana Lahteenmaa, D.O., proceeding pro se as the Respondent in the above-styled matter, hereby provide notice, pursuant to Florida Administrative Code Rule 28-106.206 and Florida Statutes § 120.569, that I have filed evidence in support of my Motion to Compel Discovery submitted on July 16, 2025, with the Division of Administrative Hearings (DOAH). The evidence, including attached exhibit photos, is critical to my Motion and the administrative proceedings scheduled for trial on August 5–6, 2025.

EVIDENCE I HAVE FILED

I am filing the following exhibits, as referenced in my Motion to Compel Discovery, with DOAH via the eALJ portal and serving them upon Petitioner's counsel to support my allegations of discovery violations, fraudulent billing, licensure discrepancies, identity theft concerns, and other irregularities raised in my Motion. I have attached copies of the exhibit photos at the end of this Notice:

1. **Exhibit A:** An email from Michael Morris, Esq., dated July 15, 2025, denying receipt of my notarized interrogatories served on November 19, 2024.
2. **Exhibit B:** Page 67 of the deposition transcript, dated December 10, 2024, containing a false certification by Craig W. Taylor, stenographer, stating I appeared remotely despite my physical presence.

3. **Exhibit C:** Emails from Teladoc confirming I lack a Florida Medicaid license and requesting I obtain one.
4. **Exhibits D-1, D-2, D-3, D-4:** Screenshots of Medicare/Medicaid billing records (Availity data) showing fraudulent charges exceeding \$4,000 for 15–45-minute visits under my name.
5. **Exhibits E-1, E-2:** American Board of Psychiatry and Neurology (ABPN) 2016 certificate misclassifying me as an MD and the current ABPN website status as of July 15, 2025.
6. **Exhibits F-1, F-2:** Florida Department of Health (DOH) license records showing my two active licenses (OS 16911) with issuance dates of January 3, 2024, and February 17, 2024.
7. **Exhibits G-1, G-2:** Emails I sent to the Florida Board of Osteopathic Medicine (MQA.Osteopath@flhealth.gov) addressing licensure discrepancies, with no response received.
8. **Exhibits H:** Copies of my successfully submitted IC3 and other complaints to various agencies regarding, but not limited to, fraud, cyberattacks and severe retaliation.
9. **Exhibit I:** The FBI's 2025 FOIPA denial letter related to my case.
10. **Exhibits J:** My medical records documenting the urgent need for biopsy, canceled health insurance and a denied breast lump biopsy due to hacker interference and retaliation.
11. **Exhibits K:** Documentation of Teladoc system malfunctions contributing to false allegations against me.
12. **Exhibit L:** Medical bill from Delray Medical Center dated August 12–16, 2024, showing total charges of \$44,288.75 with a \$40,844.75 insurance adjustment despite "None on File" for insurance, and my insurance having been cancelled by hackers already in early 2024.
13. **Exhibit M:** Motion for Protective Order filed by Stephen Burch on November 25, 2024, in Case No. 24-004162PL.
14. **Exhibit N:** Photos of a Teladoc PowerPoint presentation instructing operators how to “not inform viewers of recording” regarding provider access software camera or patient access device camera, discovered amidst cyberattacks.

PURPOSE OF MY FILING

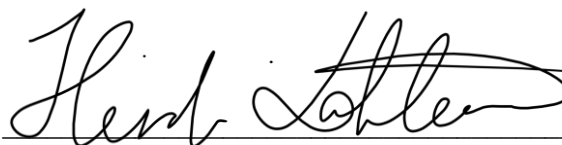
I am filing these exhibits, including the attached photos, to support the claims in my Motion to Compel Discovery. These claims include, but are not limited to: (1) Petitioner's failure to produce requested discovery materials, including a detailed exemption log for withheld or redacted documents as required by § 119.07(1)(d), Florida Statutes; (2) evidence

of Medicare/Medicaid fraud involving unauthorized billing under my name, conducted without my approval or proper licensure; (3) licensure and certification irregularities; (4) potential identity theft involving a second Social Security Number; (5) falsified discovery materials, including unnotarized interrogatories and an inaccurate deposition transcript, (6) evidence of potential government funding of my Baker Act admission as shown in Exhibit L, (7) evidence of a potentially obstructive Motion for Protective Order filed by my former counsel (Exhibit M) and (8) evidence of Teladoc's potential unauthorized access to personal devices as shown in Exhibit N. These documents and photos are essential to my defense and to ensuring a fair and just proceeding.

ATTACHMENT OF EXHIBIT PHOTOS

I have attached the physical or electronic copies of the exhibit photos corresponding to Exhibits A, B, C, D-1, D-2, D-3, D-4, E-1, E-2, F-1, F-2, G-1, G-2, H, I, J, K, L, M, and N at the end of this Notice. These photos are provided with necessary redactions to protect Protected Health Information (PHI) as required by law, while preserving all relevant evidence as submitted with my Motion to Compel Discovery, and are incorporated herein by reference.

Respectfully submitted,



Dr. HEIDI MARJAANA LAHTENMAA, D.O.
Pro Se
Nane Los Inc.



Date: July 16, 2025

CERTIFICATE OF SERVICE:

I certify that a copy of this motion was filed electronically with DOAH via the eALJ portal on July 16, 2025, and furnished to Michael Morris, DOH counsel, at Michael.Morris@flhealth.gov and the Public Records Coordinator at PublicRecordsRequest@flhealth.gov on July 16, 2025.

A hard copy will be sent by certified mail to: Florida Department of Health, 4052 Bald Cypress Way, Bin C-65, Tallahassee, FL 32399, if required.

ATTACHMENTS:

(Attached Exhibit Photos: Exhibits A, B, C, D-1, D-2, D-3, D-4, E-1, E-2, F-1, F-2, G-1, G-2, H, I, J, K, L, M and N).

EXHIBITS FOR MOTION TO COMPEL DISCOVERY



Morris, Michael 4:34 PM
to me, Madison ^

From Morris, Michael Michael.Morris@flhealth.gov
To [REDACTED]
Cc Howard, Madison
Madison.Howard@flhealth.gov
Date Jul 15, 2025 at 4:34 PM

Standard encryption (TLS)
[Learn more](#)

Dr. Lahteenmaa – We never received any notarized interrogatories. We did do your deposition soon after that, and believe those questions were answered at your deposition in front of the court reporter, who is also a notary public. Those unverified interrogatories, which were Exhibit E to your deposition, stand on their own as unverified interrogatories.

...

Exhibit A

Heidi Lahteenmaa
December 10, 2024

1
2
3 CERTIFICATE OF OATH
4
5
6 STATE OF FLORIDA
7 COUNTY OF PALM BEACH
8
9
10 I, the undersigned authority, certify
11 that HEIDI MARJAANA LAHTENMAA, D.O. remotely
12 appeared before me and was duly sworn on the 10th
13 day of December, 2024.
14 Signed this 12th day of December, 2024.
15
16 
17
18 CRAIG W. TAYLOR, STENOGRAPHER
19 Notary Public, State of Florida
20 My Commission No. HH 84400
21 Expires: 3/28/25
22
23
24
25

www.lexitaslegal.com
(800) 676-2401

Exhibit B

Active Licenses Inbox x



P

Provider Relations <providerrelations@teladochealth.com>
to me ▾

Fri, Oct 15, 2021, 3:54 PM



Good Afternoon Dr. Lahteenmaa,

We received your message regarding your license status and I wanted to see if our credentialing team has been able to send you a reply at this time? Under your profile currently all licenses are showing as active except for your FL Medicaid.



P

Provider Relations

Fri, Oct 15, 2021, 3:56 PM



Hi again Dr. Lahteenmaa, I am sorry to send the below message as incomplete. Under your profile currently all licenses are showing as active except for your FL

H

Heidi Lahteenmaa [REDACTED]

Tue, Mar 29, 10:52 AM



to me ▾

----- Forwarded message -----

From: **Provider Relations** <providerrelations@teladochealth.com>

Date: Fri, Oct 15, 2021 at 3:56 PM

Subject: RE: Active Licenses

To: [REDACTED]

Exhibit C

Availability | Essentials | Home | Notifications | My Favorites | Florida | Help & Training | Heidi's Account

Patient Registration | Claims & Payments | Clinical | My Providers | Reporting | Payer Spaces | More

Member ID [REDACTED] Subscriber [REDACTED] Provider NANE LOS INC
DOB [REDACTED] Provider ID [REDACTED]

ambetter.

Claim [REDACTED]
Status RECEIVED
Dates of Service 01/01/2022 - 01/01/2023

Verify Eligibility ☒ Remittance Viewer ☒ Print this Page

Claim [REDACTED]

Dates of Service	Processed Date	Status	Billed	Paid
01/01/2022 - 01/01/2023	N/A	RECEIVED	N/A	N/A

Status as of 01/13/2023

- Acknowledgement/Acceptance into adjudication system-The claim/encounter has been accepted into the adjudication system.
- Claim has been adjudicated, awaiting payment cycle

Check Number N/A

Claim [REDACTED]
Status FINALIZED
Dates of Service 01/01/2022 - 01/01/2023
Billed \$1,573.57
Paid

Exhibit D-1

Avallity | essentials | Home | Notifications | My Favorites | Florida | Help & Training | Heidi

Patient Registration | Claims & Payments | Clinical | My Providers | Reporting | Payer Spaces | More

Dates of Service
01/01/2022 - 01/01/2023

Billed
\$85.00

Paid
\$85.00

Claim
[REDACTED]

Status
FINALIZED

Dates of Service
01/01/2022 - 01/01/2023

Billed
\$4,128.00

Paid
\$182.91

Exhibit D-2

Avallity | essentials | Home | Notifications | My Favorites | Florida | Help & Training | Heidi's Account

Patient Registration | Claims & Payments | Clinical | My Providers | Reporting | Payer Spaces | More

Claim
[REDACTED]

Status
FINALIZED

Dates of Service
01/01/2022 - 01/01/2023

Billed
\$1,573.57

Paid
\$111.86

Claim
[REDACTED]

Status
FINALIZED

Dates of Service
01/01/2022 - 01/01/2023

Billed
\$1,036.00

Paid
\$240.08

- Acknowledgement/Acceptance into adjudication system-The claim/encounter has been accepted into the adjudication system.
- Claim has been adjudicated, awaiting payment cycle

Check Number
N/A

Exhibit D-3

Avallity

essentials

Home

Notifications

My Favorites

Florida

Help & Training

Heidi's Account

Logout

Patient Registration

Claims & Payments

Clinical

My Providers

Reporting

Payer Spaces

More

Keyword Search

Claim

Status

FINALIZED

Dates of Service

01/01/2022 - 01/01/2023

Billed

\$700.00

Paid

\$133.40

Claim

Status

FINALIZED

Dates of Service

01/01/2022 - 01/01/2023

Billed

\$85.00

Paid

\$85.00

Exhibit D-4

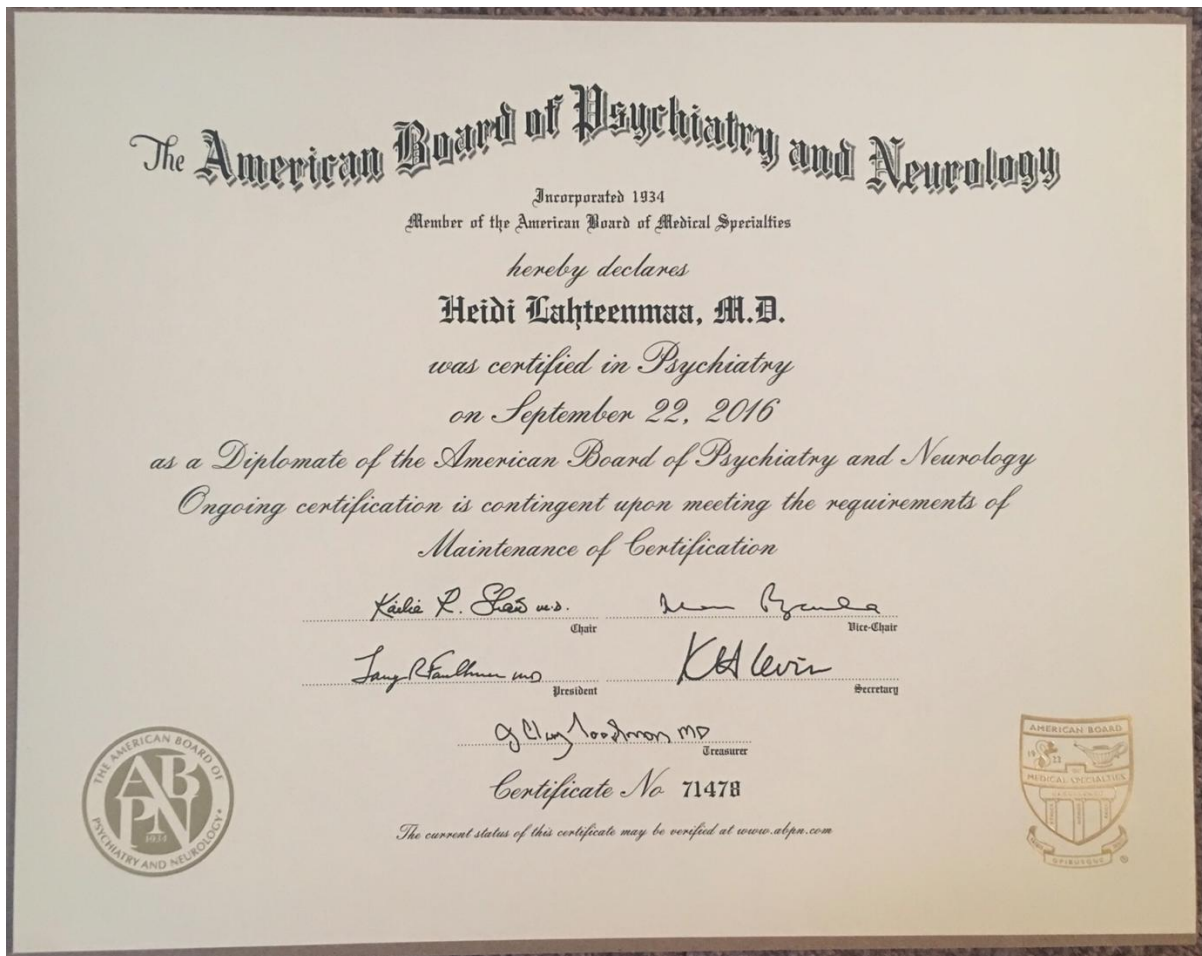


Exhibit E-1

← → ↻ apps.abpn.org/physicianportal ☆ 📄 🗨️ 🔔 ⋮



American Board of Psychiatry and Neurology, Inc.

Heidi Lahteenmaa
[REDACTED] MENU

PHYSICIAN PORTAL

Welcome, Heidi Lahteenmaa, M.D.

Questions about the Physician Portal, certification requirements, or deadlines should be addressed to Questions@abpn.org or contact (847) 228-6512. Please allow 2 business days for a response to your message.

*** Updated 06/16/2025 **

Important Changes to ABCC and Self-Assessment CME – Please read carefully before proceeding further

ABPN is pleased to announce that starting in June 2025, the required number of article exams in the Article-Based Continuing Certification (ABCC) Pathway is now set at **20 every three years** for each certification. This approach makes it easier to keep track of article exam progress for those with two or more certifications. Your Portal will now show your article exam progress separately for each of your certifications. Also beginning now for diplomates in the Continuing Certification (CC) Program, the Self-Assessment CME requirement is **reduced from 24 SA-CME credits to 16 SA-CME credits per 3-year CC block**.

ABCC is an ongoing assessment pathway. Diplomates must successfully complete article exams every 3 years to remain in the ABCC pathway. If a diplomate successfully completes the ABCC article exams for 3 consecutive 3-year blocks (i.e., 9 years), there are no article exams required in the 10th year.

Diplomates choosing the ABCC Pathway will begin their first 3-year ABCC block the year after their initial certification or most recent recertification in that field.

Diplomates who do not successfully complete the article exams in their first 3-year ABCC block will be able to 'catch up' in their second 3-year block. However, further 'catch-up' is not possible: diplomates who do not successfully complete the article exams after that second 3-year block will be required to take the Continuing Certification examination in year 10, provided they have remained in good standing with all other CC Program requirements.

Please refer to [Continuing Certification Activity Requirements](#) and [ABCC FAQs](#) for more information and details.

American Board of Psychiatry and Neurology
Continuing Certification



<https://abpn.org/continuing-certification/>

21°C Mostly sunny 6:55 AM 7/15/2025

Exhibit E-2



Exhibit F-1

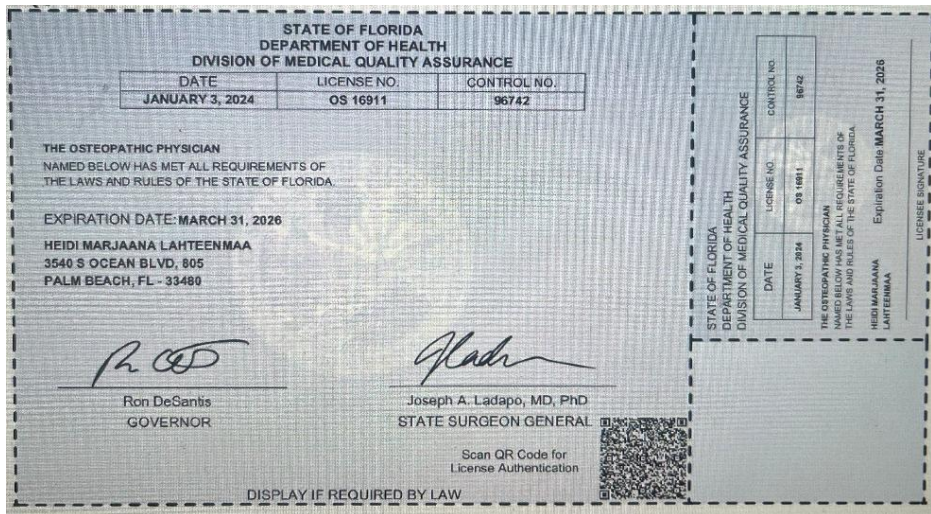


Exhibit F-2

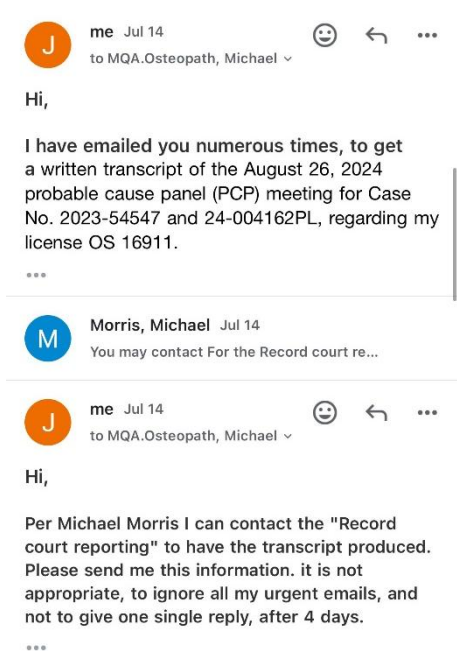


Exhibit G-1

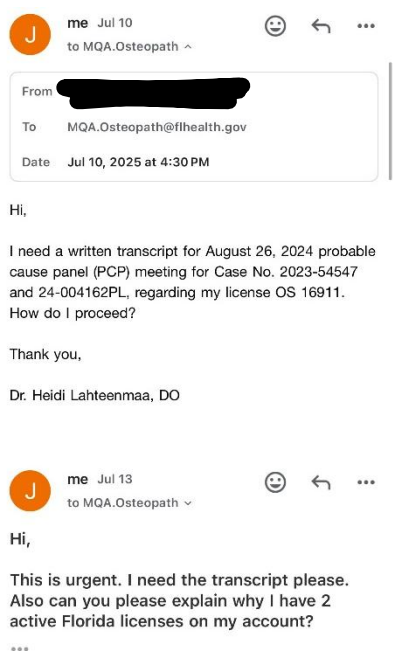


Exhibit G-2

Exhibits H

10:44 LTE 23

Boulevard

Address
(continued):
Suite/Apt./Mail 805
Stop:
City: Palm Beach
County:
Country: United States of America
State: Florida
Zip: 33480
Code/Route:
Phone: 7866229216
Number:
Email: 
Address:
Business IT
POC, if
applicable:
Other
Business
POC, if
applicable:

Description of Incident

Provide a description of the incident and how you were victimized. Provide information not captured elsewhere in this complaint form.

Dear FBI, I thought I could attach photos to my previous letter but I was mistaken. I am asking for assistance in the matter related to my medical licenses. I have lost 4 state licenses as my computers divert automatically to sites controlled by hackers, whom have

complaint.ic3.gov

8:31 LTE 53

complaint: ☐

Who Filed the Complaint

Were you the victim in the incident described above? Yes
Name:
Business
Name:
Phone
Number:
Email
Address:

Digital Signature

By digitally signing this document, I affirm that the information I provided is true and accurate to the best of my knowledge. I understand that providing false information could make me subject to fine, imprisonment, or both. (Title 18, U.S.Code, Section 1001)

Digital Signature: Heidi Lahteenmaa
Thank you. Your complaint was submitted to the IC3. Please save or print a copy of your complaint before closing this window. **This is the only time you will have to make a copy of your complaint.**

FAQs | Disclaimer | Privacy Notice | About IC3

complaint.ic3.gov

10:45 LTE 23

complaint: ☒

Who Filed the Complaint

Were you the victim in the incident described above? Yes
Name:
Business
Name:
Phone
Number:
Email
Address:

Digital Signature

By digitally signing this document, I affirm that the information I provided is true and accurate to the best of my knowledge. I understand that providing false information could make me subject to fine, imprisonment, or both. (Title 18, U.S.Code, Section 1001)

Digital Signature: Heidi Lahteenmaa
Thank you. Your complaint was submitted to the IC3. Please save or print a copy of your complaint before closing this window. **This is the only time you will have to make a copy of your complaint.**

FAQs | Disclaimer | Privacy Notice | About IC3

complaint.ic3.gov

9:47 LTE 23

Number:
Email: gr ne
Address:
Business IT
POC, if
applicable:
Other
Business
POC, if
applicable:

Description of Incident

Provide a description of the incident and how you were victimized. Provide information not captured elsewhere in this complaint form.

Dear FBI,

I am asking for your help to immediately terminate this unjust and inhumane

8:31 LTE 53

County:
Country: United States of America
State: Florida
Zip: 33480
Code/Route:
Phone: 7866229216
Number:
Email: 
Address:
Business IT
POC, if
applicable:
Other
Business
POC, if
applicable:

Description of Incident

Provide a description of the incident and how you were victimized. Provide information not captured elsewhere in this complaint form.

Hi, this is a follow up to my prior complaints if you have received them. The situation at the

9:48 LTE 23

complaint: ☒

Who Filed the Complaint

Were you the victim in the incident described above? Yes
Name:
Business
Name:
Phone
Number:
Email
Address:

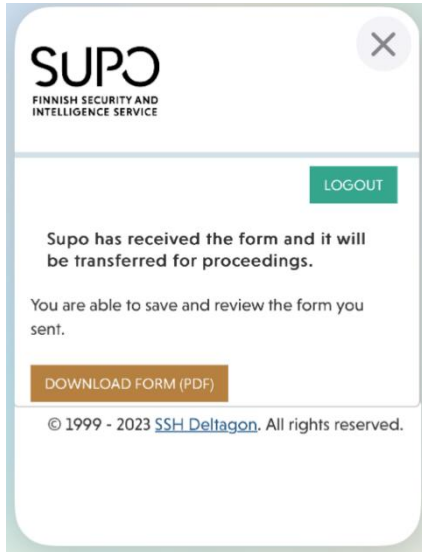
Digital Signature

By digitally signing this document, I affirm that the information I provided is true and accurate to the best of my knowledge. I understand that providing false information could make me subject to fine, imprisonment, or both. (Title 18, U.S.Code, Section 1001)

Digital Signature: Heidi Lahteenmaa
Thank you. Your complaint was submitted to the IC3. Please save or print a copy of your complaint before closing this window. **This is the only time you will have to make a copy of your complaint.**

FAQs | Disclaimer | Privacy Notice | About IC3

complaint.ic3.gov — Private



11:28

LTE 70



Mail Fraud Complaint form submitted successfully.

Thank you for completing the form.

The information you provided will be entered into our national complaint system.

The U.S. Postal Inspection Service gathers data on mail-related crime to determine whether a violation has occurred. While we can't guarantee that we can recover lost money or items, your information can help alert Inspectors to problem areas and possibly prevent other people from being victimized. U.S. Postal Inspectors base their investigations on the number, substance, and pattern of complaints received from the public.

We ask you to keep all original documents related to your complaint. We will contact you ONLY if more information is needed.

f YouTube e ACCESSIBILITY | FREEDOM OF INFORMATION ACT | PRIVACY POLICY | U.S. POSTAL SERVICE | 1-877-876-2456

2:53

5G E 90

responsible Department of Justice component for appropriate handling.

Please note:

- Before sending us your information, please read our [Website Privacy Policy](#) and the Privacy Statement below for details about how we handle personal information.
- This form should not be used for service of official, case-related or legal documents because it is not monitored for such submissions or for other time-sensitive communications.
- If you know the specific organization or official you wish to contact, please indicate such in your message or check the [Component Contact Information Page](#) to contact them directly.

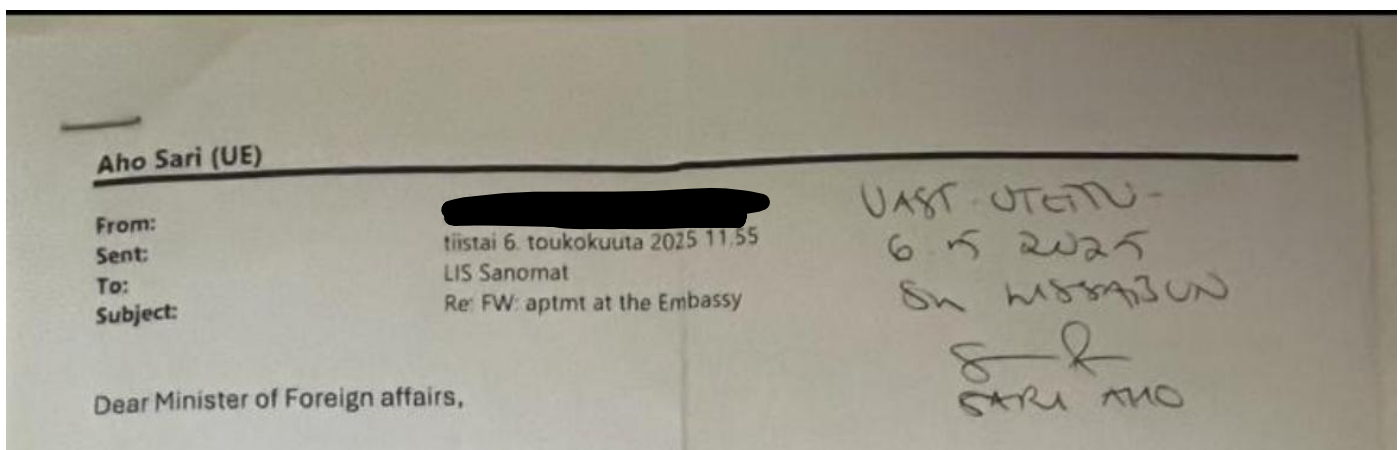
In some instances the volume of communication on a particular issue is such that we cannot respond to each message individually. We would like you to know, however, that all incoming messages are forwarded to the appropriate organization within the Department of Justice and you can be assured that your voices and views are being heard.



Thank you, your submission has been received.

[Back to form](#)

Updated July 17, 2024



PALM BEACH COUNTY SHERIFF'S OFFICE PAGE 1
CASE NO. 24059857 OFFENSE REPORT CASE NO. 24059857
DISPOSITION: ZULU
DIVISION: ROAD PATROL

911:

INFORMATION

SIGNAL CODE: 14 CRIME CODE: NON CRIME CODE: PS CODE: 9514 DATE: 05/06/24 MONDAY
ZONE: N11 GRID: 19-11 DEPUTY I.D.: 6461 NAME: KORB DONNA ASSIST: TIME D 1459 A 1459 C 1606
OCCURRED BETWEEN DATE: 05/06/24 , 1500 HOURS AND DATE: 05/06/24 , 1606 HOURS
EXCEPTION TYPE:

INCIDENT LOCATION: 3540 S OCEAN BD APT. NO.: 805
CITY: SOUTH PALM BEACH STATE: FL ZIP: 33480

NO. OFFENSES: 00 NO. OFFENDERS: UK NO. VEHICLES STOLEN: 0 NO. PREMISES ENTERED: 0
LOCATION: APARTMENT / CONDOMINIUM
NO. VICTIMS: 00 NO. ARRESTED: 0 FORCED ENTRY: 0

NAME LIST:

ROLE:

OTHER HEIDI LAHTENMAA DOB: 10/25/1977
SEX: F RACE: W HT: 0 WT: 0 HR: BROWN EYE: UNKNOWN
RESIDENTIAL ADDRESS: 3540 S OCEAN BD APT. 805 SOUTH PALM FL 33480 HOME PHONE: 702 755-6142
BUSINESS PHONE: 561 000-0000
..

ON MONDAY, MAY 6, 2024 AT ABOUT 1500 HOURS I MET WITH HEIDI LAHTENMAA AT DISTRICT 19. THIS WAS IN REFERENCE TO INCIDENTS TAKING PLACE AT HER RESIDENCE LOCATED AT 3540 S. OCEAN BLVD, SOUTH PALM BEACH. HEIDI EXPLAINED THAT SHE WAS A WHISTLEBLOWER ABOUT A YEAR AND HALF AGO FOR A COMPANY CALLED TELADOC. SHE SAYS SINCE THEN SHE HAS BEEN HACKED BY THE COMPANY. HEIDI EXPLAINED EVERY TIME SHE USES A PHONE IT IS TRACKED. SHE BELIEVES HER COMPUTER IS HACKED AND THEY SET UP FAKE ACCOUNTS ON HER COMPUTER. HEIDI WANTED TO USE A PHONE THAT DID NOT BELONG TO HER TO CALL THE FBI. HEIDI USED THE PHONE AT DISTRICT 19 TO CONTACT THE FBI REGARDING THIS.

HEIDI STATED SHE HAS SEEN A PSYCHIATRIST REGARDING THIS. SHE DOES NOT KNOW IF SHE IS HAVING A FOLLOW UP.

AT THIS TIME HEIDI IS DENYING THAT SHE NEEDS ANY HELP AND IS NOT A HARM TO HERSELF.

HEIDI WAS GIVEN THE INFORMATION ON 211. AT THIS TIME HEIDI DOES NOT MEET THE CRITERIA FOR A BAKER ACT.

THIS REPORT IS FOR INFORMATIONAL PURPOSES ONLY.

D/S KORB / 6461

DICT: 050624

printed by Employee Id #: 9093 on June 24, 2024 03:39:40PM

PALM BEACH COUNTY SHERIFF'S OFFICE PAGE 2
CASE NO. 24059857 OFFENSE REPORT CASE NO. 24059857
DISPOSITION: ZULU

EMAILED: 05062024/0405 PM
TRANS: 05/07/24 MLB 14757 (COPIED AND PASTED VERRATIM).

printed by Employee Id #: 9093 on June 24, 2024 03:39:40PM

Exhibits I



U.S. Department of Justice

Federal Bureau of Investigation
Washington, D.C. 20535

January 3, 2025

HEIDI LAHTENMAA
[REDACTED]
[REDACTED]
[REDACTED]

Request No.: [REDACTED]
Subject: LAHTENMAA, HEIDI

Dear Heidi Lahtenmaa:

This is in response to your Freedom of Information/Privacy Acts (FOIPA) request. Based on the information you provided, we conducted a main entity record search of the Central Records System (CRS) per our standard search policy. However, we were unable to identify records subject to the FOIPA that are responsive to your request. Therefore, your request is being closed. If you have additional information pertaining to the subject of your request, please submit a new request providing the details, and we will conduct an additional search. For more information about records searches and the standard search policy, see the enclosed FBI FOIPA Addendum General Information Section.

Please see the paragraphs below for relevant information that may be specific to your request. Only checked boxes contain corresponding paragraphs relevant to your request. If no boxes are checked, the corresponding information does not apply.

- ☐ Please be advised that your request was reopened based on the additional information you provided. A new search was conducted, and we were unable to identify records subject to the FOIPA that are responsive to your request.
- ☐ Records potentially responsive to your request were destroyed. Since this material could not be reviewed, it is not known if it was responsive to your request. Record retention and disposal is carried out under supervision of the National Archives and Records Administration (NARA) according to Title 44 United States Code Section 3301, Title 36 Code of Federal Regulations (CFR) Chapter 12 Sub-chapter B Part 1228, and 36 CFR 1229.10. Please be advised that the General Records Schedule (GRS) disposition authority for FOIPA records is DAA-GRS-2016-0002-0001 (GRS 4.2, Item 020).
- ☐ Records potentially responsive to your request were transferred to the National Archives and Records Administration (NARA). If you wish to review these records, file a FOIPA request with NARA at the following address:

National Archives and Records Administration
Special Access and FOIA
8601 Adelphi Road, Room 5500
College Park, MD 20740-6001
- ☐ Potentially responsive records were identified during the search. However, we were advised that they were not in their expected locations. An additional search for the missing records also met with unsuccessful results. Since we were unable to review the records, we were unable to determine if they were responsive to your request.
- ☐ The identification records requested are maintained by the FBI's Criminal Justice Information Services (CJIS) Division; therefore, we have forwarded a portion of your request to CJIS for processing. To check the status of this request, please contact CJIS directly at (304) 625-5590. For additional information, see the enclosed FBI FOIPA Addendum General Information Section.
- ☒ Requests for expedited processing are not applicable when a final response is issued within ten calendar days.

- ☐ Police departments should be aware that the search conducted was limited to FBI records. Requests for criminal history records or rap sheets should be directed to Criminal Justice Information Services (CJIS). Information regarding CJIS is listed in the enclosed FBI FOIPA Addendum General Information Section.
- ☐ Records potentially responsive to your request were transferred to the National Personnel Records Center - Civilian Personnel Records (NPRC-CPR). In order to obtain information on a file located at the NPRC, your request must be mailed to the following address:

National Archives and Records Administration
ATTN: Archival Programs
P.O. Box 38757
St. Louis, MO 63138

Please refer to the enclosed FBI FOIPA Addendum for additional standard responses applicable to your request. **"Part 1"** of the Addendum includes standard responses that apply to all requests. **"Part 2"** includes additional standard responses that apply to all requests for records about yourself or any third party individuals. **"Part 3"** includes general information about FBI records that you may find useful. Also enclosed is our Explanation of Exemptions.

Additional information about the FOIPA can be found at www.fbi.gov/foia. Should you have questions regarding your request, please feel free to contact foipaquestions@fbi.gov. Please reference the FOIPA Request number listed above in all correspondence concerning your request.

If you are not satisfied with the Federal Bureau of Investigation's determination in response to this request, you may administratively appeal by writing to the Director, Office of Information Policy (OIP), United States Department of Justice, 441 G Street, NW, 6th Floor, Washington, D.C. 20530, or you may submit an appeal through OIP's FOIA STAR portal by creating an account following the instructions on OIP's website: <https://www.justice.gov/oip/submit-and-track-request-or-appeal>. Your appeal must be postmarked or electronically transmitted within ninety (90) days of the date of this response to your request. If you submit your appeal by mail, both the letter and the envelope should be clearly marked "Freedom of Information Act Appeal." If possible, please provide a copy of your original request and this response letter with your appeal.

You may seek dispute resolution services by emailing the FBI's FOIA Public Liaison at foipaquestions@fbi.gov. The subject heading should clearly state "Dispute Resolution Services." Please also cite the FOIPA Request Number assigned to your request so it may be easily identified. You may also contact the Office of Government Information Services (OGIS). The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001, e-mail at ogis@nara.gov; telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769.

Sincerely,



Michael G. Seidel
Section Chief
Record/Information Dissemination Section
Information Management Division

Enclosures

Exhibits J

Florida Cancer Specialists - Palm Beach Gardens

3401 PGA Blvd Suite 200, Palm Beach Gardens, FL 33410

Phone: 561-366-4100 Fax: 855-288-2991

Patient Name: **Lahteenmaa, Heidi**

Date: **8/10/2024**

Patient Number: **2101723**

Date Of Birth: **10/25/1977**

Physical Examination

General: Well developed, well nourished, alert, and cooperative. Appears to be in no acute distress.

HEENT: PERRLA. EOMI. The sclerae are anicteric. The mucous membranes are moist and the oropharynx is without lesions.

Neck: Supple without adenopathy.

Lymph: No cervical, supraclavicular, axillary, epitrochlear or inguinal adenopathy is noted.

Cardiovascular: There is regular rate and rhythm without murmurs, rubs, or gallops.

Lungs: Clear to auscultation.

Skin: Normal color, texture and turgor.

Breasts: No dimpling, discharge or adenopathy noted. The left breast has no changes except for some typical fibrocystic changes, however there is a 2 x 3 cm oblong area in the right breast extending toward the axilla that is hard, mass like but with smooth borders. No skin or nipple distortion.

Abdomen: Soft, nontender, with no hepatosplenomegaly and normoactive bowel sounds.

Extremities: There is no clubbing, cyanosis, or edema.

Lab results

Labs reviewed from outside and investigation recorded and summarized in this note.

Impression

Presents for evaluation of a right breast mass present several years at least. Does not feel that it is growing. Mammogram and US reported as normal recently at Rayus.

Discussed that while the US and mammogram reports provided provide some reassurance, I believe that any mass of concern needs either immediate palpation guided biopsy or at the very least close clinical follow up with a breast surgeon for their expertise. Therefore, per national guidelines, I recommended referral to a breast surgeon and provided her the phone number to our breast center at Good Sam. She explained she would rather call rather than be called due to problems with her phone. Re-iterated importance of breast surgeon expertise and consideration for biopsy to examine for cancer. She expressed understanding and advised she would call Monday for appointment,

thank you kindly.

Total time spent face-to-face with patient including my assessment, time spent reviewing prior visits, communication from and with consultants, reviewing laboratory/pathology/imaging results as well as documenting the visit was equal to 45 minutes.

Oncology / Hematology Problems

New Oncology Problems/Diagnoses: 'Other abnormal and inconclusive findings on diagnostic imaging of breast(793.89/R92.8)'.

Fax to:

Cathleen Bernstein, APRN--(561)328-6918;

Advanced Care Planning - Type of discussion

Patient verbally verified Advance Care Plan is up to date and accurate.

 (561)-366-4100

JUDAH FRIEDMAN, MD
Board-Certified in Medical Oncology and Hematology

Dr. Rose
Breast Center. *advised patient to call*

Colleen Campbell.

561-603-3903.

Dr. Kleban *Edwards*
Dr. Rheit *-lock*
-rod

Freedom Life Insurance Company of America
300 Burnett Street
Suite 200
Fort Worth, Texas 76102
1-800-387-9027

INVOICE DATE: 3/22/2024

MONTHLY

PREMIUM NOTICE

HEIDI LAHTENMAA
3540 S OCEAN BLVD
APT 805
PALM BEACH FL 33480

ID NUMBER	INSURED NAME	COVERAGE TYPE	DUE DATE	AMOUNT DUE
52X047731B	HEIDI LAHTENMAA	HEALTH	2/20/2024	259.19
52X047731C	HEIDI LAHTENMAA	HEALTH	2/20/2024	11.21
52X047731D	HEIDI LAHTENMAA	HEALTH	2/20/2024	27.92
52X047731G	HEIDI LAHTENMAA	TERM	2/20/2024	32.40

Philippines

TOTAL DUE 330.72

We should receive your payment by the due date noted above. Thank you for your continued business.
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1-800-387-9027

my account from my wife bond up closed Rachel B.P. 7AM 7PM 5-1 PM

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(FREBIL)

PLEASE RETURN THIS PORTION WITH YOUR PAYMENT

ID NUMBER	INSURED NAME	COVERAGE TYPE	DUE DATE	AMOUNT DUE
52X047731B	HEIDI LAHTENMAA	HEALTH	2/20/2024	259.19
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52X047731G	HEIDI LAHTENMAA	TERM	2/20/2024	32.40

TOTAL DUE 330.72

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COMPANY OF AMERICA**
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00330720052002591952X0477318000112152X047731C000279252X047731D000324052X047731G

United Collection Bureau, Inc.
5620 Southwyck Blvd
Toledo OH 43614
1-800-386-9272
payment.ucbinc.com

November 26, 2024

United Collection Bureau, Inc. is a
will use any information you give us

United Collection Bureau, Inc.
5620 Southwyck Blvd
Toledo OH 43614
1-800-386-9272
payment.ucbinc.com

December 19, 2024

United Collection Bureau, Inc. is a debt collector. We
will use any information you give us to help collect the c

Our information shows:
You have a debt with DELRAY MEDICAL CENTER
account number ending in 9291.
As of 08-12-24, you owed:
Between 08-12-24 and today:
You were charged this amount in interest: +
You were charged this amount in fees: +
You paid or were credited this amount
toward the debt: -
Total amount of the debt now:

1:45 5G 69

< Friday 12:54 AM Edit ⋮

S	M	T	W	T	F	S
25	26	27	28	29	30	31
Friday August 30, 2024						
4 AM						
5 AM						
6 AM						
7 AM						
8 AM						
9 AM						
10 AM						
11 AM						

Elena Rheil

Jupiter office 11 am 641
university blvd 105 334...

Exhibits K; Teladoc Systems Malfunctions

RE: TDH--Encrypt : RE: From Dr. Lahteenmaa; urgent question regarding the phone option



Funke Agbasi <funke.agbasi@teladochealth.com>

09/05/2023 at 07:07 AM

To: Heidi lahteenmaa <h[REDACTED]> Details ▾

Display Images

⚠ For your security, images are not being displayed. Consider this before displaying them.



Thank you for these examples Dr. Lahteenmaa, I will share this with the engineering team. It might be best for you to chat with them directly so all your concerns are addressed. Is there a phone number I can provide to them?

Best,

Funke Agbasi MD, MBA

Senior Medical Director

Clinical Network Management Western Region

Teladoc Health, Inc.

Work: 617.402.2136

Cell: 988-755-8878



From Dr. Lahteenmaa; Patient examples of concerns and other questions



Hi [REDACTED]
to Ashley, Deanna ▾

Oct 5, 2023, 1:26 PM

Hi,

Please see the following examples. Also can you confirm the receipt and that the toggle has been turned ON?

Thank you,

Dr. Lahteenmaa

One attachment • Scanned by Gmail ⓘ



↩ Reply

↩ Reply all

➦ Forward



"Hi Ashley and Deanna,

Here are some examples for your reference. Please note this is just a very small collection of issues comprising a short time period between Sept 1st to date. The common pattern for Teladoc to "address" these issues is to tell you "have patient take screenshots so we can send them to IT team" and/or "send us the patient Member/Consult IDs or otherwise we cannot proceed to help you". However, due to many of the problems being system issues, effecting numerous patients over the platform, I simply would not have time to type up patient examples for all of my patients raising concerns. I alerted Dr. Dainer about this issue in early 2022 but my concerns were dismissed and Teladoc continues to request specific patient examples. Many of the questions, I have sent over to various departments on Teladoc over the years, as they occur, but again I am still waiting for answers. I have numerous other questions and concerns as well, but as you can see this is extremely time consuming. I fail to see how this info, provided by this provider alone, would not require and warrant a throughout multidisciplinary investigation? Let me know if you have any questions.

Thank you,

Dr. Lahteenmaa

MEDICATION REFILL ISSUES:

1) JW Consult ID [REDACTED] seen on 09/30/23

"She reports having issues with Walgreens as "their system keeps telling me I have no refills, even though I know I do, and then I run out of meds. Eventually they fill it like a week later. Their automated system is handled by another company and does not work. I keep getting letters also stating that through CVS Caremark I can get 90 days ". Currently she gets 30 days of meds at a time at Walgreens, despite me ordering 90 days. She tells me she changed the pharmacy to CVS mailorder, yet it still shows Walgreens on my end. During the appointment she changed it to CVS Mailorder again, and removed all other pharmacies on the Teladoc app, yet it still showed Walgreens on my end, after refreshing my screen, so I changed it to CVS Caremark MAILSERVICE for her. She has Team Care Blue Cross/Shield."

2) CMI Consult ID [REDACTED] seen on 09/28/23

"She made this appointment only to get refills as she had ran out of fluoxetine 20 mg caps last week. She never got the #90 from Publix, I had ordered on 08/03/23 and was only given #30 10 mg caps. She states "they never even mentioned it as if they did not even have it". She has Blue Cross/Shield. Since last week she has been taking 2 x 10 mg fluoxetine daily. No other changes from prior."

3) B MG consult ID [REDACTED] seen on 10/03/2023

"She tells me again today that she has been having issues getting her meds from Walgreens as their app keeps telling her she does not have any more refills left. She only has #4 tabs left of sertraline 25 mg. Per their

app she has 0 refills for 25 mg tabs and 1 refill for 100 mg tabs. She has Aetna. They only give her 30 days at a time."

4) MF Consult ID [REDACTED] seen on 10/02/2023

"She has 2 caps left, and states that Walgreens app showed she has 1 refill on the 90 days script; supposedly the one I sent over last time. When she clicked to request it to be filled she got an alert "Action Needed. Caution!" and when she calls Walgreens they cant fill it but wont tell her why. She has Blue Cross/Shield."

5) AJ Consult ID [REDACTED] seen on 09/16/23

"She tells me that CVS never got the script, I had ordered at our last visit on 08/19/23, and she had to call Teladoc who "reordered it and changed the pharmacy to Walgreens" although did not change on her chart on my end or on her and still showed CVS today, so I changed it to Walgreens again. She states this is the second time this happened with CVS. She has Blue Cross/Shield."

6) BS Consult ID [REDACTED] seen on 09/14/23

"She ran out of bupropion ~ last weekend ~5 days ago as per Walgreens there is no prescriptions although I sent both in at our last appointment on 09/06/23. She made this appointment just to sort out this issue about refills. She tells me she got a message from Walgreens on 09/09/23 stating that they have "sent a request to the provider but could not get a hold of anyone".

PHARMACY MAIL ORDER ISSUES:

1) HH Consult ID [REDACTED] seen on 10/03/23

"She is asking me to change her pharmacy to Express Scripts Home Delivery as she is unable to change it on Teladoc platform stating "it does not let me pick Express Scripts as I am not in Missouri". I changed it for her. She has Signa"

2) JW Consult ID [REDACTED] seen on 09/30/23 (also under Med refill issues section)

"She reports having issues with Walgreens as "their system keeps telling me I have no refills, even though I know I do, and then I run out of meds. Eventually they fill it like a week later. Their automated system is handled by another company and does not work. I keep getting letters also stating that through CVS Caremark I can get 90 days ". Currently she gets 30 days of meds at a time at Walgreens, despite me ordering 90 days. She tells me she changed the pharmacy to CVS mailorder, yet it still shows Walgreens on my end. During the appointment she changed it to CVS Mailorder again, and removed all other pharmacies on the Teladoc app, yet it still showed Walgreens on my end, after refreshing my screen, so I changed it to CVS Caremark MAILSERVICE for her. She has Team Care Blue Cross/Shield"

3) BRDO Consult ID [REDACTED] seen on 09/28/23

"She has a missed appointment on 09/04/23 and is running low on meds. She requested this appointment for today to rediscuss the pharmacy on her file and to get refills as she never got any from OptumRx Mail Service. I told her they were not ordered at last visit as we were going to meet on the 09/04/23. I had changed her pharmacy from CVS to Optum, at our last visit on 08/15/23, as she was unable to as she gets a message on Teladoc stating "you must choose a pharmacy in your state". She then chose CVS and told me that "every time I request an appointment it makes me choose the pharmacy again, or I cannot schedule". This was the case scheduling today's visit as well. Her pharmacy shows as CVS again on my end as well, so I changed it to Optum Rx Mail Service. She also reports that she had requested refills from me on Optum Rx app, and opens the app during our appointment today. She tells me "It says here "Will contact Dr. Lahteenmaa for more refills" and I clicked on it before". I informed her that I have not gotten these refill requests/messages from Teladoc. She has United."

4) KC Consult ID [REDACTED] seen on 09/23/23

"She is asking me to change the pharmacy from Walgreens to CVS Caremark. as when she tried to change it on the app she gets an error "cannot have pharmacy in the state you are not located in". Her insurance only pays for 90 days supplies she states. Pharmacy changed to CVS Caremark MAILSERVICE"

PATIENT ACCESS TO CARE ISSUES:

A. FOLLOW UPS DISGUISED AS NEW AND UNABLE TO GET IN

Note; My NEW patients have been turned off for an extended time period; most recently by Admin for reasons unknown to me. Prior to this I had to keep the toggle turned OFF due to "flooding" issue I informed you about previously. I have numerous other examples to show if needed, however that would require chart review going further back, and can be quickly performed by Teladoc.

1) KB Consult ID [REDACTED] seen on 09/29/23

"She is a follow up patient to me and was last seen on 06/19/23 at which time we increased fluoxetine to 20 mg Daily and continued hydroxyzine hydrochloride 10 mg; take 1-3 tablets 1-2 times a day for anxiety as needed. She tells me today that her insurance changed from Blue Cross to Aetna and in June and therefore was given a NEW patient account on Teladoc. None of the previous visits with me show on this new account. She reports she had to fill "everything all over again just like a NEW patient". She also tells me that "it took 3 weeks to get scheduled with you, as you were not accepting new patients, and I called Teladoc and they made me a follow up". She is a NEW pt today however in a 45 minute slot."

2) CS Consult ID [REDACTED] seen on 09/02/23

"She is a follow up patient to me and was last seen on 08/18/23 under member ID [REDACTED]. Despite her being a follow up she is taking an entire 45 minute slot on my schedule and is visible on my calendar as well. None of the old notes is carried over to this new account. She states that she called Teladoc as she could not login to her old account. Her plan with United changed. She was using Healthiest you prior as well. She states "the guy from TDoc told me I have to make a new account and there was no other way to get on your schedule. He unblocked the "accepting new patients" on your account just long enough that I can get in, as you were not taking any new patients at the time". She also states that "our appointment for Dec 1st was cancelled by him as it was linked to the old account". She is seeing me today, essentially to do what we already did a few weeks ago, to set up the Dec appointment again and to make sure she is set to follow with this provider."

B. DUPLICATE APPOINTMENTS IN ONE/SEPARATE SLOTS FOR THE SAME PATIENT/DAY

1) DMS Consult ID [REDACTED] seen on 10/03/23

"He tells me today that he was not able to accept the appointment we had picked together on 07/27/23. Teladoc app kept asking him to update his insurance, even though there has been no changes. He has Blue Cross. Eventually the appointment dropped off, as he was unable to accept it despite trying numerous times. He then had to request a new appointment for today, and tells me he ended up requesting 2 appointments for today to make sure he can be seen. He made these appointments yesterday. He denies requesting them for the same time and has no idea how he has 2 appointments in the same slot. He also states that "no availability was shown for you at all after the 7th of October" and he was "unable to click on any of the dates after 10/07/23" as they were greyed out on my profile shown to him on his TDoc app."

2) AR [REDACTED] seen on 09/11/23

"She had another appointment with me this am and states she did not see it on her end and it had cancelled, despite still being on my calendar taking a slot from another patient. She states that she got "a message last week from TDoc to update my billing info. Something that they needed a deductible payment so I went to update it and I did not see the appointment for today anymore and it was not there. So I picked a new one for today at this time". She has Blue Cross."

3) KL Consult ID [REDACTED] seen on 09/02/23

"She has 2 appointments today both at the same time but under a different Mental Health ID. [REDACTED] vs [REDACTED]. She has no idea how this happened and states that when she tried to accept the appointment after out last visit on 08/19/23 the app would tell her to "review the past and future appointments" and when she tried to click on it she would get "Internal Server Error". She then sent a message to help desk but "they never replied" so she was never able to accept the appointment we had picked together for today at 9 am EST. She had to request a new appointment and sent it for 11 am EST today and states I accepted it. She was only given an option to pick one appointment request slot instead on 3 like in the past. She has FL Blue and had recent plan changes."

C. UNABLE TO FIND PROVIDER and/or PROVIDER SCHEDULE INCORRECT/NOT VISIBLE:

1) DMS Consult ID [REDACTED] seen on 10/03/23

"He tells me today that he was not able to accept the appointment we had picked together on 07/27/23. Teladoc app kept asking him to update his insurance, even though there has been no changes. He has Blue Cross. Eventually the appointment dropped off, as he was unable to accept it despite trying numerous times. He then had to request a new appointment for today, and tells me he ended up requesting 2 appointments for today to make sure he can be seen. He made these appointments yesterday. He denies requesting them for the same time and has no idea how he has 2 appointments in the same slot. He also states that "no availability was shown for you at all after the 7th of October" and he was "unable to click on any of the dates after 10/07/23" as they were greyed out on my profile shown to him on his TDoc app."

2) JJ Consult ID [REDACTED] seen on 09/16/23

“ Patient told me on 09/16/23 that he was not able to fill the mental health questionnaire for our appointment as his "account got locked" and he is unable to login at all. He states that before the appointment started he "got a message from TDoc saying "you no longer access to your account based on your provider's changes recently". He denies changes to his insurance and reports he was with Friday until April -23 and has been without insurance since. Recommended calling TDoc to gain access, as I am unable to help with login issues, and he communicated understanding. He also states that he has been trying to find this provider on TDoc on various occasions, to make an appointment with me, but has been unable to find me in the system. He states "I tried to find you trying all possible ways and preferences, and I could not find you in the system. I tried a month ago and then more recently with no luck, but I kept trying and one day you popped up once and I was able to request this appointment”

3) RJ Consult ID [REDACTED] en on 09/14/23

“She was a NOSHOW on 08/12/23 because of the move but when she tried to reschedule with me "1-1.5 weeks ago" I have no availabilities until today on her days off on Thursday, Fridays or Saturdays. She has Aetna.”

4) JF Consult ID [REDACTED] /for 09/21/23 AND 09/07/23 [REDACTED]

“He was lost to follow and states he got no notifications for the missed appointment on 04/07/23. He was then trying to locate this provider but when he logged in he'd get "a popup on screen stating my account does not exist" and could not locate it using his DOB, name or other common info. He later found it as he found his complicated username. He has FL Blue.”

“He tells me today that he tried to access his notes a few days after our last visit, but was unable to. He called Teladoc but they were not able to help him. He still cannot see any of his notes on the platform and was no able to complete the mh questionnaire. He has FL Blue.

D. UNABLE TO CONFIRM FUTURE APPOINTMENTS:

1) DMS Consult ID [REDACTED] seen on 10/03/23

“He tells me today that he was not able to accept the appointment we had picked together on 07/27/23. Teladoc app kept asking him to update his insurance, even though there has been no changes. He has Blue Cross. Eventually the appointment dropped off, as he was unable to accept it despite trying numerous times. He then had to request a new appointment for today, and tells me he ended up requesting 2 appointments for today to make sure he can be seen. He made these appointments yesterday. He denies requesting them for the same time and has no idea how he has 2 appointments in the same slot. He also states that "no availability was shown for you at all after the 7th of October" and he was "unable to click on any of the dates after 10/07/23" as they were greyed out on my profile shown to him on his TDoc app.”

2) JR Consult ID [REDACTED] seen on 09/15/23

“She tells me that she has been having issues with the app. She tried to click on the prompt that I sent her on 09/02/23 for tomorrow 09/16/23 "at 10 am or 10:15 am" but was unable to accept it on her phone or on the regular computer as the "site would just freeze". The appointment was never confirmed, and "dropped off", and she requested today's appointment instead. She has Blue Cross.”

3) ZH Consult ID [REDACTED] seen on 09/01/23

"She ran out of meds ~3 weeks ago as she could not get in to see this provider due to app issues. She states that the app would just close as soon as she would attempt to do anything on it. She made this appointment a week ago and first openings with this provider were in 2 days. She denies getting any reminders for 06/12 apptm and did not get phonecalls the day of the appointment, despite confirming it on her end after our meeting on 03/20/23. She has Aetna."

E. NOT RECEIVING PROMPTS/REMINDERS:

1) EB Consult ID [REDACTED] seen on 09/28/23

"She has been on sertraline 50 mg PO Q AM for ~ 19 months and denies side-effects, besides possible "jaw glenching", and reports much benefit. She wants to decrease a bit. She has Aetna. She has 1 pill left as she missed 2 appointments with me. She states that she has no idea how she missed the appointments. She denies getting any prompts from Teladoc reminding her of the appointments or any prompts at all for that matter and gets no links to our appointments."

2) DF consult ID [REDACTED] seen on 09/23/23 and consult ID [REDACTED] seen on 07/26/23

"He has been taking Lamictal 100 mg PO Q AM, sertraline 25 mg PO Q AM, and Trazodone 100 mg PO Q HS since last visit and denies side-effects and reports much benefit. He missed an appointment yesterday, and requested a new one for today and was able to get in with no issues but states "13 hours later late last night I got an email from Teladoc saying that "the appointment has been cancelled", so I am happy you called as I thought today's visit was cancelled". He posted photos on his account. He contacted Publix yesterday and requested refills and they told him they "need to get a hold of his provider and the earliest pick up would be tomorrow at 3 pm". He has Blue Cross/Shield.

"He has only 2 pills of Lamictal left, as the appointment we chose together for last Friday did not occur and did not go to my calendar for some reason. I see no missed appointments for that day. He states that he got a notification, after our last appointment, from TDoc stating that this provider had scheduled it but there was nowhere to confirm it on the app. There was no phone call or video that day, so he had to request another appointment for today which is a very inconvenient day for him."

3) LT Consult ID [REDACTED] seen on 09/19/23

"She tells me today that she does not get any prompts from Teladoc, and therefore could not accept the appointment we chose together on 08/18/23 for 09/06/23. She has a NOSHAW on 09/06/23, but again was not even aware of the appointment. She picked this appointment a few days ago on her own."

4) KDR Consult ID [REDACTED] seen on 09/16/23

"She tells me she could not accept our follow up appointment, we picked together on 09/09/23, as "Tdoc app wanted me to update billing info and was acting like I did not click the billing prompt on my cell and would just circle. The appointment eventually dropped off". She has no follow up pending. Recommended calling TDoc and she communicated understanding."

5) MD Consult ID [REDACTED] seen on 09/08/23

"She ran out as she missed an appointment with me. Last pill was yesterday. She reports that the appointment for 08/22/23 confirmed on her end but the day of she did not get a phone call. She states she has had similar issues with her therapist who stated the appointment is not on her calendar. She has Signa Truemark PPO."

6) AH Consult ID [REDACTED] seen on 09/14/23

"She tells me today that she missed the 08/25/23 appointment as she never got any reminders/alerts about it, like she usually gets. She logged on to her account but could not find any info whatsoever regarding the 08/25/23 appointment. She also denies ever making the 06/12/23 appointment. She has Blue Cross/Shield."

7) EB Consult ID [REDACTED] seen on 09/11/23

"She self reduced to 10 mg in the evening as 20 mg was causing some sleep issues. She denies side-effects at this dose. She ended up having extras, from self reduction, and therefore did not run out of meds as she was a NOSHOW on 08/18. She states she never got any notifications on her phone about the appointment and "did not realize we had one". She also had no notification on her Outlook Calendar and usually manually marks her future appointments there. When she went to make today's appointment she had to "reset password and go through all the medical questions like as if my account had been reset but I redid everything this weekend". She has Blue Cross/Shield."

8) GC Consult ID [REDACTED] seen on 09/07/23

"She reports having numerous issues with the app. She has many NOSHOWs on her chart and states "something happens on my app and multiple appointments get deleted!". We picked a follow up date together on 06/21/23 for 08/14/23 and states it confirmed on her end after she clicked it and got a confirmation. She then looked on her app later and states "I could not find the appointment and it was deleted" and the same thing happened with the therapy appointments. She has FL Blue."

9) BP Consult ID [REDACTED] seen on 09/06/2

She was a NS on 07/26/23 and states that she never got a phone call that day or any reminders/notifications. She has Blue Cross/Shield. She did not ran out of meds, as she skips the 2nd dose few times/week, and has a few days left.

F. SUDDEN FEES/EXTRA FEES

1) JS Consult ID [REDACTED] seen on 10/02/23

"He has Blue Cross/Shield and reports he "got a \$15.00 bill for our appointments 1 or 2 times like 2 visits ago but not last time". Recommended calling TDoc to clarify billing related issues."

2) AP Consult ID [REDACTED] seen on 09/15/23

"Reminded her about the account issue prompt and she states "oh it's still there? I called Teladic and they said I need to pay a copay of \$70.00 as my insurance Aetna does not cover that. I just need to pay that again, and it will go away, plus otherwise I cannot book with you anyways cause it does not let me until I take care of the payment".

G. ACCOUNT ACCESS ISSUES/ INSURANCE INFO REQUIRED (AGAIN)

1) AA Consult ID [REDACTED] seen on 09/23/23

"She has FL Blue and will change to Aetna in Oct. She has had issues with the app as she has to put in her insurance info again prior to each appointment with this provider.

2) JJ Consult ID [REDACTED] seen on 09/16/23 (also under UNABLE TO FIND PROVIDER section)

" Patient told me on 09/16/23 that he was not able to fill the mental health questionnaire for our appointment as his "account got locked" and he is unable to login at all. He states that before the appointment started he "got a message from TDoc saying "you no longer access to your account based on your provider's changes recently". He denies changes to his insurance and reports he was with Friday until April -23 and has been without insurance since. Recommended calling TDoc to gain access, as I am unable to help with login issues, and he communicated understanding. He also states that he has been trying to find this provider on TDoc on various occasions, to make an appointment with me, but has been unable to find me in the system. He states "I tried to find you trying all possible ways and preferences, and I could not find you in the system. I tried a month ago and then more recently with no luck, but I kept trying and one day you popped up once and I was able to request this appointment".

3) KDR Consult ID [REDACTED] seen on 09/16/23

"She tells me she could not accept our follow up appointment, we picked together on 09/09/23, as "Tdoc app wanted me to update billing info and was acting like I did not click the billing prompt on my cell and would just circle. The appointment eventually dropped off". She has no follow up pending. Recommended calling TDoc and she communicated understanding."

4) MS Consult ID [REDACTED] seen on 09/15/23

"Informed her about the account issue prompt and she states that on the app it said there is "something wrong with my insurance, but I have not made any changes, and then it disappeared". She has Aetna."

5) WH Consult ID [REDACTED] seen on 09/01/23

He lost United on June 30th and is getting on a diff plan. In addition, he has been locked out of his TDOc app since Dec -22 and called TDoc but states "they could not help me despite multiple password resets". He then called again recently, after he lost his insurance, and states that "the staff told me they can't help me as the account is connected to United and that I need to make a new one and there is nothing they can do". He

wanted to contact this provider about the refills but was unable to, via messaging system, as the app was not in operation."

H .GEN MED AVAILABLE IN THE NEXT 24 HRS but not PSYCH

- I have numerous documented examples of this; again requiring chart review

1) ML consult ID [REDACTED] seen on 09/30/23

"He went to Gen Med 2 x on Teladoc to get a refill as "I needed it that day and with psychiatry you need to wait to get in".

I. BOSSWARE CONCERNS:

1) GR Consult ID [REDACTED] seen on 09/07/23

"She told me at the appointment on 09/07/23 that she has had numerous issues with the appointments and the problems occurred again during 09/07/23 visit. We were able to connect however as I had happened to call her on my cell after the appointment time was over, since we were unable to connect on the video/TDoc audio system. I had converted the video visit to phone visit and was using Teladoc audio system and also my own cell, but it kept going to the answer machine. Teladoc audio system was not able to reach her either. She reports that when she has appointments on Teladoc, her phone goes to silent mode by itself, and this happens even if she is on a video visit. She had to tell her husband, that her phone will not work when she is having therapy sessions, in case he calls. She reports that this happens with visits with this provider and also her therapist and is "like the 4th time now I've missed an appointment". She reports that when she is on the app she clicks on "join the session" button. She is then placed in the waiting room and her phone turns on the silent mode automatically. I asked her how could she tell and she states that she "noticed that the do not disturb button is activated on the top part of my phone screen". She then waits and never gets a call on the system or on her phone. After a while the visit ends and she is out of the waiting room and do not disturb mode is deactivated, again automatically. I happened to call her after the do not disturb had turned off, and her phone rang and we were able to have out visit. She denies getting any of the phone calls, from TDoc Audio system or from me, when she was in the waiting room or during the video session before I had converted it to phone visit and I had called numerous times"

2) JJ Consult ID [REDACTED] seen on 09/16/23 (this patient had various concerns so is broken into sections)

"He was initially a video appointment, but never showed on video as he was locked out of his account. I called him a few times during the video appointment but he did not answer. I changed the appointment to phone and called a few times but no answer. I then activated the Teladoc dialing system, and called his number on it, which placed him to the waiting room despite the fact that he was not logged on to the system. While he was in the waiting room I called him using my personal cell. I never had the system call me back on my number. At this time we were running late. He answered and a notification appeared on my computer screen stating "your call has ended". He states he keeps his phone on "do not disturb" as he has "telemarketer issues" but had turned it OFF before the appointment. He reports his phone only rang one time despite me calling him numerous times and the only call that went through to his phone was the one placed when he was in the waiting room"

3) BW [REDACTED] seen on 09/14/23

"She missed an appointment on 09/09/23 as she answered her phone but could not connect stating "it wanted me to do a session and login but when i tried it told me that "your session is about to end" so I didn't. Idk what it wants me to do?" She has Blue Cross ... We had problems connecting today as well as the phone call from my personal cell did not go through until I got the patient to the waiting room using the Teladoc dialing system. I did not have the system call me back, but rather called her again near the end of our appointment time, and she picked up saying "my phone is weird. It's like it wont let me through. I don't know how to explain it. " She denies ever logging into her account and going to a waiting room. She is simply just waiting for my phone call and it seems the system automatically put her to waiting room when i used the dialing system. Also when she answered today at 11:57 am per my cell, a popup appeared on my screen stating "Your Call has Ended" even though I am using a different cell than usual. My phone also generated prompts "11:57 am Member left the call, 11:56 am Member joined the call 11:56 am Member left the call" under "call details."

4) HW Consult ID [REDACTED] seen on 09/08/23

"She missed an appointment with me as the day of on 08/06/23 her phone rang but when she pushed to answer the "phone did not let me answer even though I kept pushing the button on screen, and then the appointment then cancelled". She has Blue Cross/Shield."

5) CH Consult ID [REDACTED] seen on 09/07/23

"I called her initially on my personal cellphone and left a message. I then used TDOc dialing system and patient was placed in the waiting room by the system. I then called her again using my cell, instead of having TDoc dial system call me, and she picks up and states "a voice message said to press 1 and the provider will be with you soon and when I did, my phone started ringing and I answered and it was you". The moment she answered, a message popped up on the screen on my end stating "your call has ended"."

6) DL Consult ID [REDACTED] Seen on 09/01/23

" I had difficulty connecting with her using the Teladoc audio system. I first called from my personal cellphone and left a message. Then I used Teladoc dialing system and got the patient to the waiting room and had the system call my phone which never rang. After a while I decided to call her back using my cellphone but when I pressed on the screen it hungs up, even though I never received any phonecalls. The same happens on repeat. She finally disconnects from Teladoc system and I call her again and she picks up and consequently Teladoc audio system disconnects on my end on the screen stating "Your Call Has Ended". She states she only received one phone call and a recording stated "press 1 and the provider will come on" and music started playing."

MISC./GENERAL BILLING and SCHEDULING ISSUES:

Schedule Issues:

- 1) Why does it state "The minimum appointment block length is 30 minutes", when adding availability blocks, when the minimum appointment length is 15 minutes?
- 2) Why do I have state license appointment blocks? These have been shifted even earlier. I have sent numerous emails about this. Is this the case just with this provider or all providers in mental health? Am I being singled out?

Billing Questions:

1) What does it mean as I am listed as a Rendering Provider? Is this how my Medicare/Medicaid patients are billed somehow, and if so how does this work in detail?

“Rendering Provider Heidi M Lahteenmaa”

2) Why am I considered as “Staff (Heidi M Lahteenmaa)” on some medications orders but on others I am “Member (Heidi M Lahteenmaa)” or “Provider (Heidi M Lahteenmaa)”?”

12/17/2022 4:00 PM EST	1:24:05	[REDACTED]	START Patient Reason Send me
12/17/2022 3:15 PM EST	0:39:05	E [REDACTED] (NEW)	START Patient Reason Send me
12/17/2022 3:15 PM EST	0:39:05	E [REDACTED] (NEW)	START Patient Reason Send me
12/17/2022 3:15 PM EST	0:39:05	E [REDACTED] (NEW)	START Patient Reason Send me
12/17/2022 3:15 PM EST	0:39:05	E [REDACTED] (NEW)	START Patient Reason Send me
12/17/2022 3:00 PM EST	0:24:05	[REDACTED]	START Patient message

Phone	Mental Health ID: [REDACTED]	10/14/2022 5:15 PM EDT	2:43:41	
Phone	Mental Health ID: [REDACTED]	10/14/2022 5:00 PM EDT	2:28:41	(NEW)
	Mental			

02/17/2022 2:15 PM EST	40:09:08	[REDACTED]	(N)
02/17/2022 2:15 PM EST	40:09:08	[REDACTED]	(N)
02/17/2022 2:15 PM EST	40:09:08	[REDACTED]	(N)
02/17/2022 2:15 PM EST	40:09:08	[REDACTED]	(N)
02/17/2022 2:00 PM EST	39:54:08	[REDACTED]	

09/10/2023 10:00 AM -08

Select a requested date

1) 09/09/2023 10:00 AM -08 Accept

2) 09/09/2023 10:30 AM -08 Accept

3) 09/09/2023 11:00 AM -08 Accept

The sequence of dates reflects the member's preference.

09/10/2023 9:00 AM -08			
09/09/2023 12:30 PM -08			
09/09/2023 11:15 AM -08	165:57:19	[REDACTED]	START Patient Info Unassign Reschedule
09/09/2023 10:00 AM -08	164:42:19	[REDACTED]	START Patient Info Unassign Reschedule
09/09/2023 9:45 AM -08	164:27:19	[REDACTED]	START Patient Info Unassign Reschedule
09/09/2023 9:30 AM -08	164:12:19	[REDACTED]	START Patient Info Unassign Reschedule
09/09/2023 9:00 AM -08	163:42:19	[REDACTED]	START Patient Info Unassign Reschedule

Search

Appointment (Required):

Done

October 2022

Ved	Thu	Fri	Sat	
28	29	30	1	8:45 AM
5	6	7	8	9:00 AM
12	13	14	15	9:15 AM
19	20	21	22	9:30 AM
26	27	28	29	9:45 AM
2	3	4	5	10:00 AM

Cancel SUBMIT

Follow Up

Select one (Required):

I am scheduling a follow up appointment

Select Date, Time, and Communication Type

Appointment (Required):

Done

October 2022

Mon	Tue	Wed	Thu	Fri	Sat	
26	27	28	29	30	1	9:00 AM
3	4	5	6	7	8	9:15 AM
10	11	12	13	14	15	9:30 AM
17	18	19	20	21	22	9:45 AM
24	25	26	27	28	29	10:15 AM
31	1	2	3	4	5	

Cancel SUBMIT

Select one (Required):

☒ I am scheduling a follow up appointment

Select Date, Time, and Communication Type

V/#				
11/18/2023 11:00 AM -08	1756:56:49	[REDACTED]	START	Info Un
11/18/2023 10:00 AM -08	1755:56:49	[REDACTED]	START	Info Un
11/18/2023 9:45 AM -08	1755:41:49	[REDACTED]	START	Info Un
11/18/2023 8:30 AM -08	1754:26:49	[REDACTED]	START	Info Un
11/18/2023 8:00 AM -08	1753:56:48	[REDACTED]	START	Info Un
11/18/2023 7:15 AM -08	1753:11:48	[REDACTED]	START	Info Un
11/18/2023 5:30 AM -08	1751:26:48	[REDACTED]	START	Info Un
11/18/2023 5:15 AM -08	1751:11:48	[REDACTED]	START	Info Un
11/17/2023 3:00 PM -08	1736:56:48	[REDACTED]	START	Info Un

#

11/18/2023 7:15
AM -08 1753:13:08 [REDACTED] START | Patient
Info | Unassign | Reschedule

11/18/2023
AM -08

11/17/2023
PM -08

11/17/2023
PM -08

11/17/2023
PM -08

11/17/2023
12:15 PM -08

11/17/2023
10:00 AM -08

11/17/2023 9:00
AM -08 1730:58:08 [REDACTED] START | Patient
Info | Unassign | Reschedule

Reschedule

How would you like to reschedule? (Required)

☐ Ask the patient to choose a new time based on my availability

☒ Choose a new date/time myself

Saturday, November 18, 2023 at 5:45 AM -08 Edit Remove

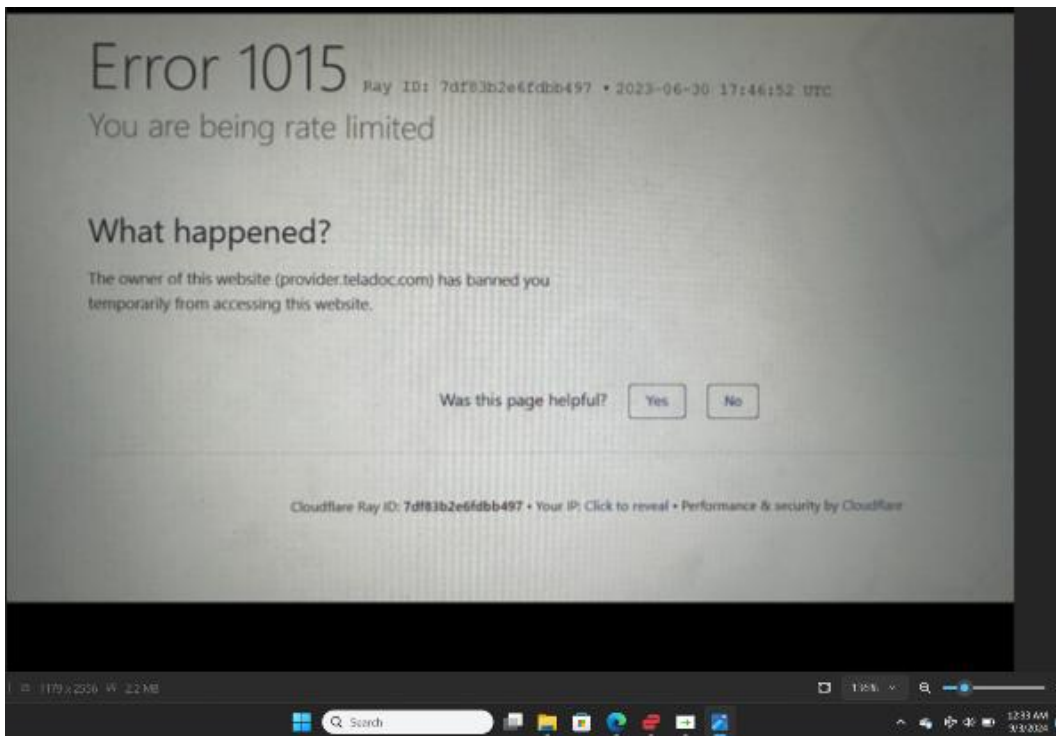
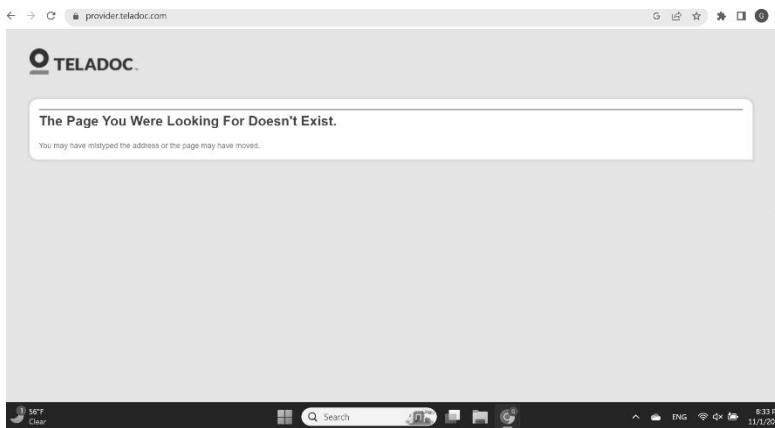
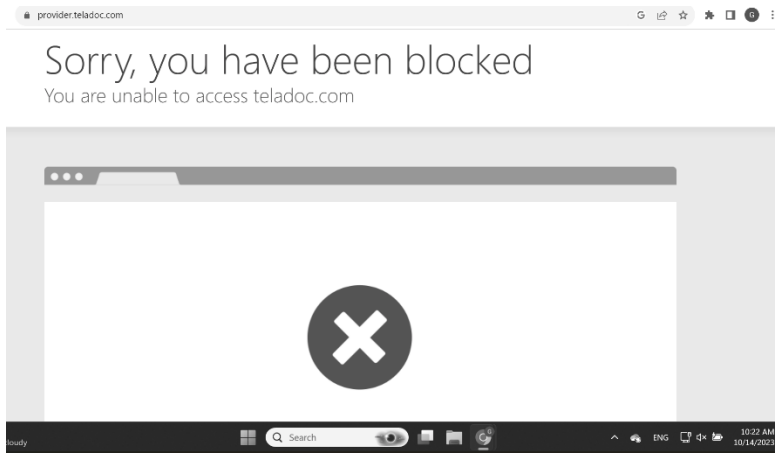
The time selected conflicts with an existing appointment. Please select another time.

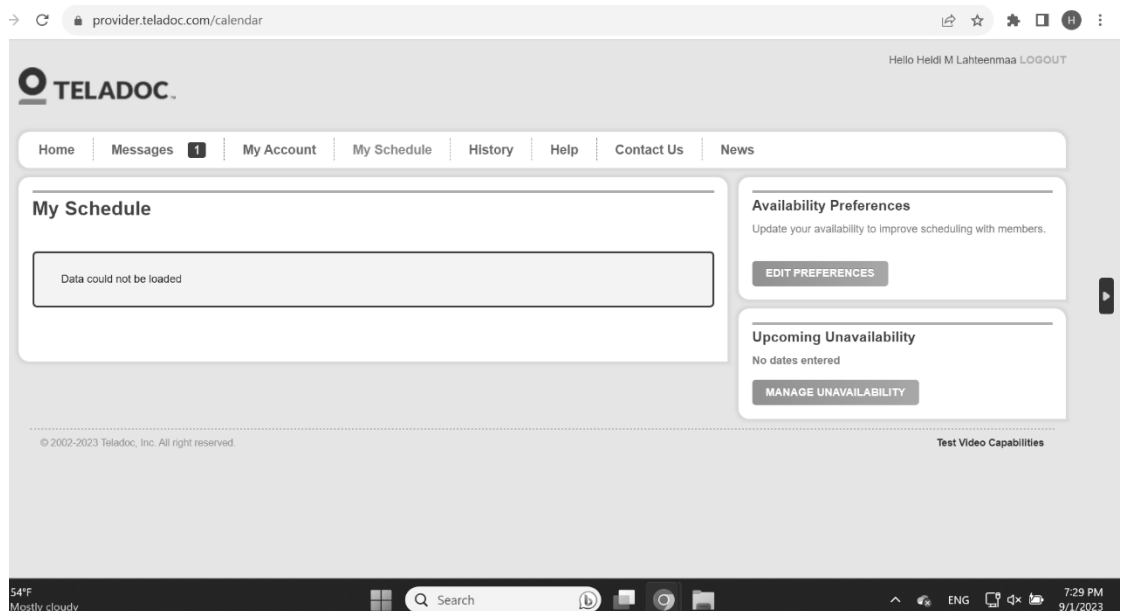
Add Another

Message to patient on rescheduling reason: (Optional)

Example: I am no longer available at this time

Cancel SUBMIT





A timeout occurred

The origin web server timed out responding to this request.

- Ray ID: 81b2be5cc82d017f
- Your IP address: 138.199.47.187
- Error reference number: 524
- Cloudflare Location: Paris

We are working to resolve this issue. Please try again in a few moments.



This site can't be reached

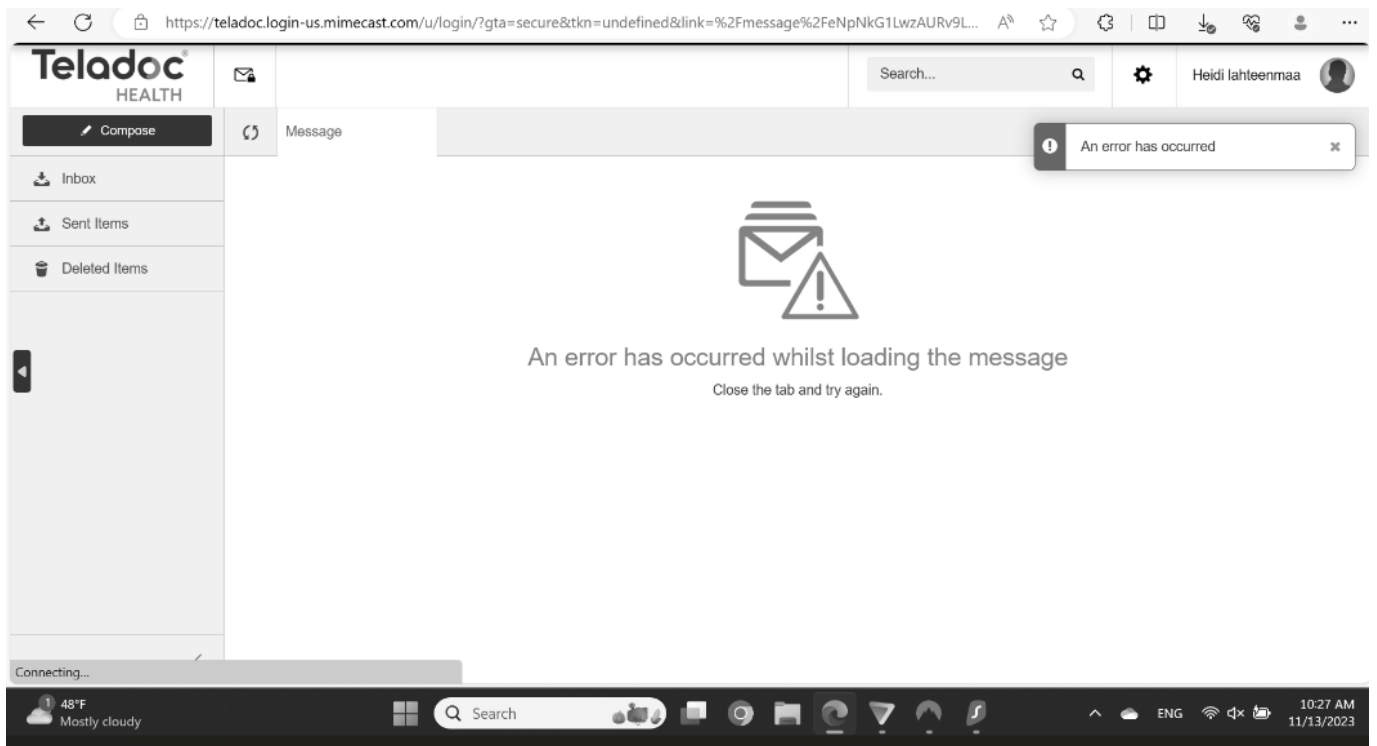
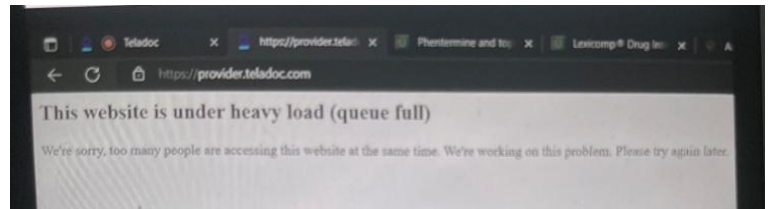
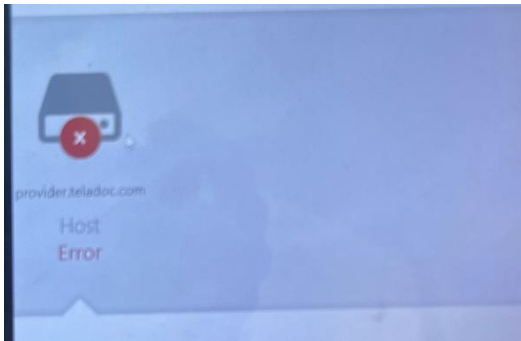
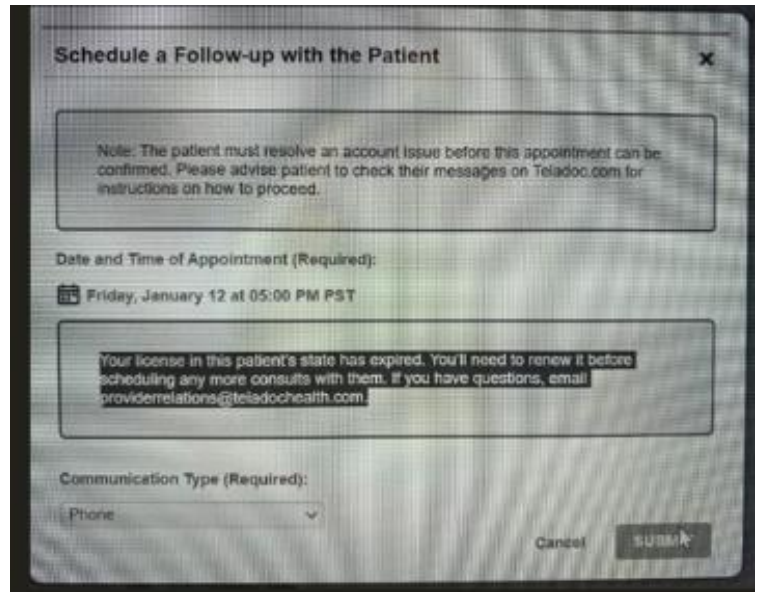
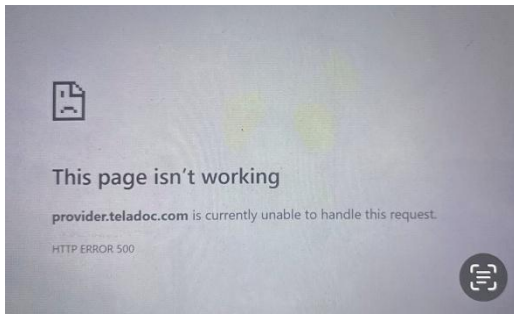
Check if there is a typo in provider.teladoc.com.

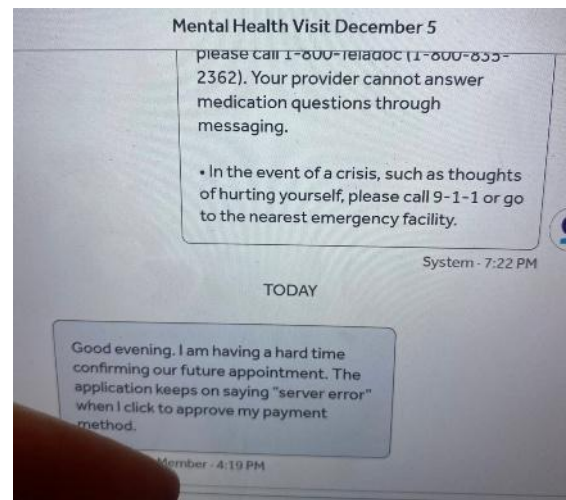
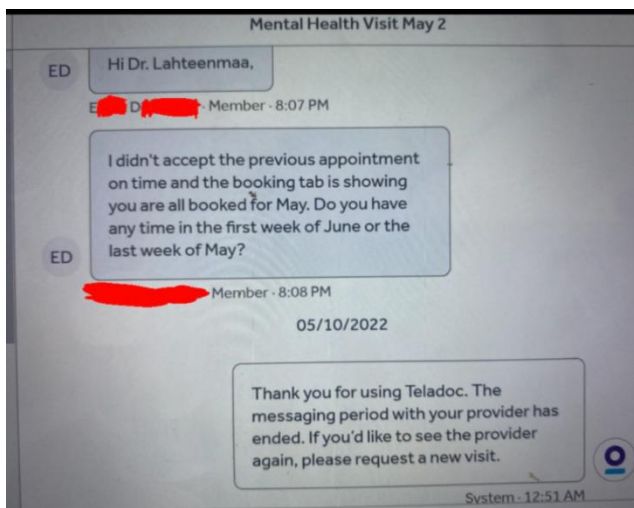
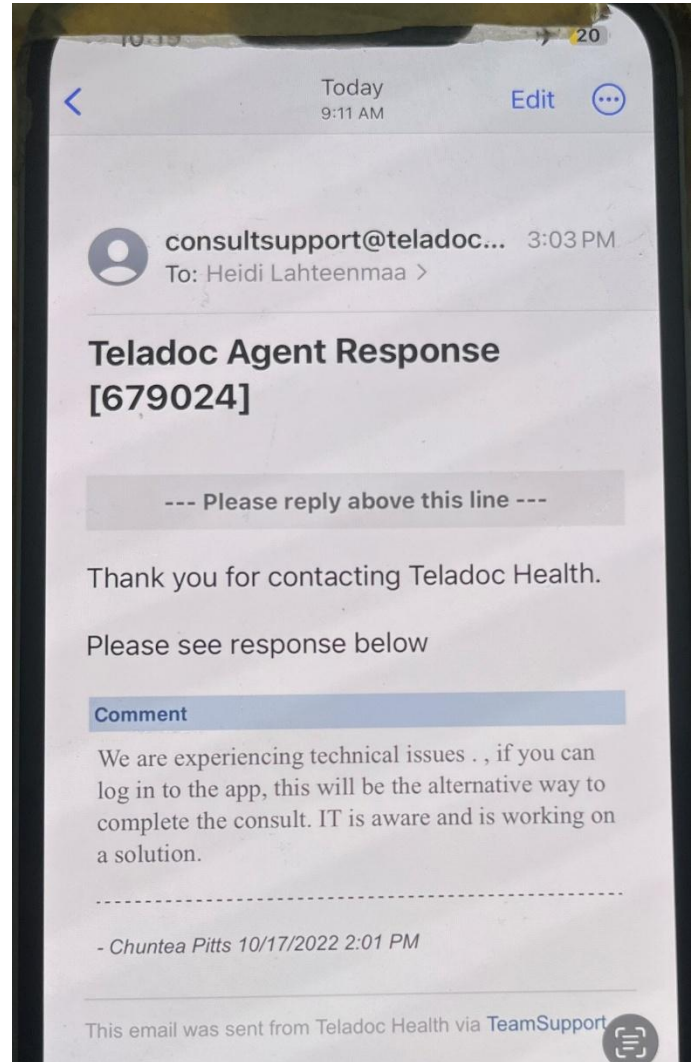
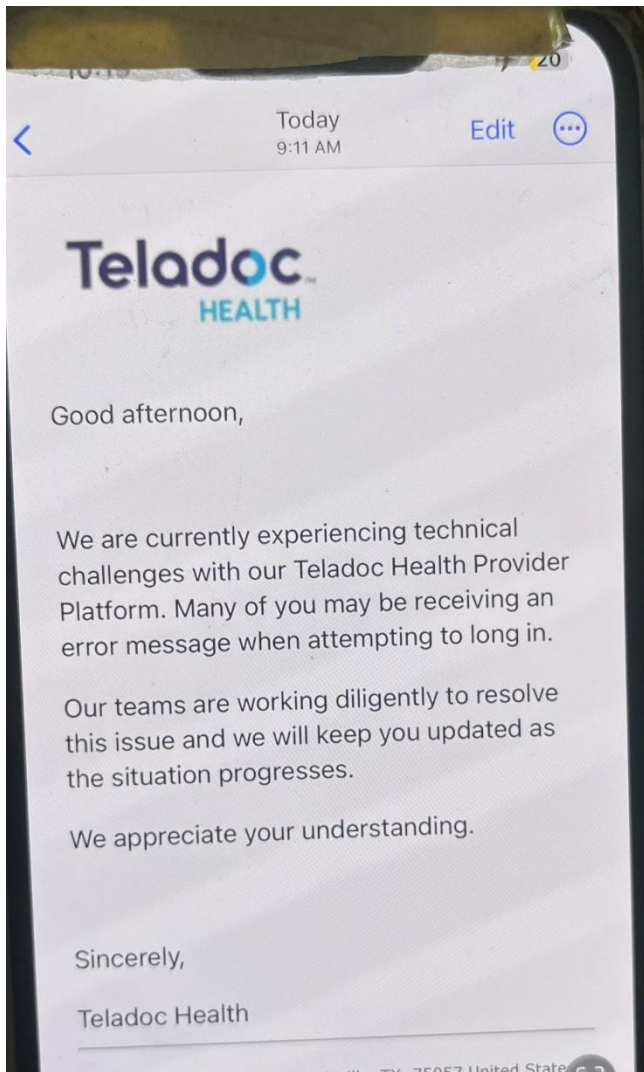
If spelling is correct, try running Windows Network Diagnostics.

DNS_PROBE_FINISHED_NXDOMAIN

Reload







Erin Dainer

to Scarlett, Lovette, me ▾

Tue, Dec 13, 1:50 PM (10 hours ago)



Hi Dr. Lahteenmaa,

I'm sorry that you were impacted by what sounds like a bug marking your licenses as inactive. I'm unsure what is happening regarding the lag in your schedule. I'm looping in Scarlett and Lovette our regional practice managers as they manage bug/tech issues.

I hope you have a wonderful holiday season!

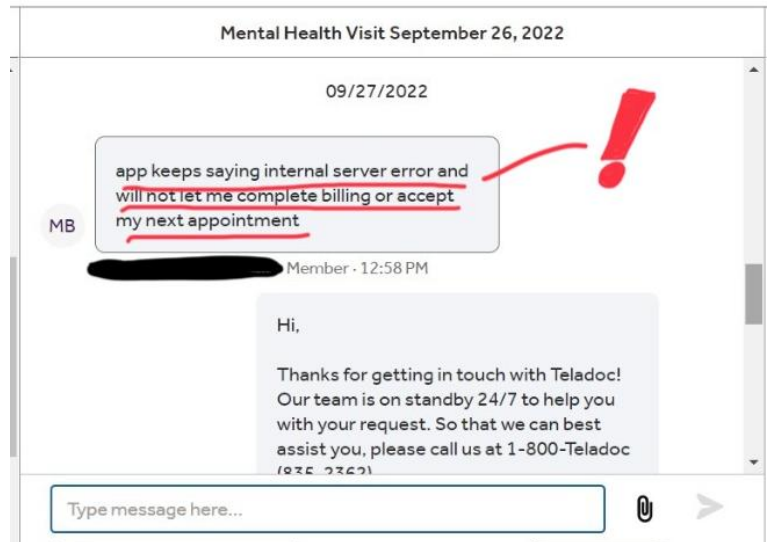
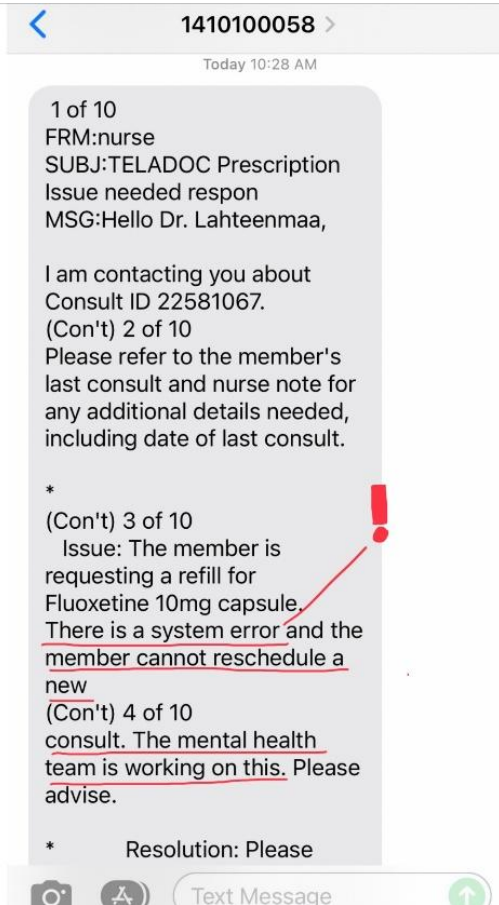


Exhibit L



Delray Medical Center

PAYMENT DUE
\$3,444.00

PATIENT NAME	PATIENT REF. NO.	SERVICE DATE(S)	DUE DATE
HEIDI LAHTENMAA	023960036	08/12/2024 - 08/16/2024	Due Upon Receipt

CHARGE(S) INCLUDED:

ROOM & NURSING CARE	\$22,304.00
PHARMACY	\$2,004.00
LABORATORY SERVICES	\$1,755.75
DIAGNOSTIC/THERAPEUTIC IMAGING	\$18,225.00

Total Charges:	\$44,288.75
Insurance Adjustments:	\$40,844.75
Amount Insurance Paid:	\$0.00
Additional Payment Due From Insurance:	\$0.00
Your Previous Payments:	\$0.00

Balance You Owe Now: \$3,444.00

PRIMARY INSURANCE:

Insurance Name	NONE ON FILE
ID Number	NONE ON FILE

SECONDARY INSURANCE:

Insurance Name	NONE ON FILE
ID Number	NONE ON FILE



2 of 3



Register to receive your bills electronically.
Visit: <https://www.palmbeachhealthnetwork.com/pay-a-bill>

STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS

DEPARTMENT OF HEALTH,

Petitioner,

Case No.: 24-4162PL

vs.

HEIDI MARJAANA LAHTENMAA, D.O.,

Respondent.

MOTION FOR PROTECTIVE ORDER

Respondent, Heidi Marjaana Lahtenmaa, D.O., by and through undersigned counsel, hereby files this Motion for Protective Order and in support states the following:

Background

1. The Department of Health ("DOH") has filed a one-count Administrative Complaint alleging that, pursuant to Florida Statute § 459.015(1)(w), Dr. Lahtenmaa is unable to practice with reasonable skill and safety to patients.

2. This complaint is based upon a mental health evaluation by Dr. Theodore R. Treese. Dr. Treese diagnosed Dr. Lahtenmaa with an "unspecified diagnosis not due to a known substance or psychological condition."

3. Despite the "unspecified" nature of the diagnosis, DOH believed it had enough evidence to support the entry of an Emergency Suspension Order.

4. On November 13, 2024, DOH served its Notice of Intent to Serve Subpoena Duces Tecum without Deposition on Nonparty on Dr. Lahtenmaa's former employer, Teladoc Health, Inc. Dr. Lahtenmaa timely objected to this notice and DOH has now indicated that they intend

1

to serve a Deposition Subpoena Duces Tecum requesting the same documentation Dr. Lahtenmaa previously objected to.

The Deposition and Duces Tecum are Improper and Should be Prohibited

5. DOH intends to serve on Teladoc Health, Inc., Dr. Lahtenmaa's former employer, a subpoena for deposition that will request the following documents: "All employment, personnel, independent contractor, payment and correspondence records involving Heidi Marjaana Lahtenmaa, D.O. from January 1, 2020 to present."

6. This is a violation of Dr. Lahtenmaa's privacy rights and is not reasonably tailored to lead to the discovery of admissible evidence.

7. The only statute cited in the Administrative Complaint is Florida Statute § 459.015(1)(w), which provides for disciplinary action based upon the following:

Being unable to practice osteopathic medicine with reasonable skill and safety to patients by reason of illness or use of alcohol, drugs, narcotics, chemicals, or any other type of material or *as a result of any mental or physical condition.*

8. Thus, DOH must prove, at final hearing, that Dr. Lahtenmaa is unable to practice "as a result of any mental or physical condition."

9. There is no allegation in the complaint that Dr. Lahtenmaa is unable to practice due to any physical condition. Therefore, the only option left by statute is that DOH believes that Dr. Lahtenmaa is unable to practice due to a mental condition.

10. Dr. Lahtenmaa's former employer will have no documentation or ability to opine on her alleged "mental" condition that DOH asserts prevents her from practicing safely. There is no relevance at all to this deposition or document request.

2

11. Further, this proposed request is not limited to any issue raised in the complaint. For example, there is no reason why Dr. Lahtenmaa's payment records are being requested. Further, there is no basis for requesting all correspondence or the entire personnel file.

12. This request is an overbroad fishing expedition and should not be permitted.

13. Further, it is expected that DOH will inquire at the deposition regarding these irrelevant, personal topics. These questions should not be permitted.

14. Undersigned has conferred with counsel for DOH in an attempt to resolve this issue and has been unable to reach a resolution. Undersigned is authorized to represent that DOH objects to the relief sought in this motion.

WHEREFORE, Dr. Lahtenmaa respectfully requests that this honorable ALJ enter a protective order preventing this deposition and preventing the production of the requested documents.

Respectfully submitted,

/s/ Stephen B. Burch
STEPHEN B. BURCH
Florida Bar Number: 90934
SMITH & ASSOCIATES
709 S. Harbor City Blvd., Suite 540
Melbourne, Florida 32901
321-676-5555
321-676-5558 Facsimile
stephen@smithlawfla.com
Counsel for Respondent

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 25th day of November 2024, a copy of the foregoing has been e-filed with the Division of Administrative Hearings and a copy served by email to the following:

Michael Morris
Assistant General Counsel
DOH-Prosecution Services Unit
4052 Bald Cypress Way, Bin C-65
Tallahassee, Florida 32399-3265
Michael.Morris@flhealth.gov

/s/ Stephen B. Burch
STEPHEN B. BURCH

S:\1962.000 Lahtenmaa, Heidi DOH Complaint\Finalings\Drafts\Motion for Protective Order 11-25-24.docx

Exhibit N

Video

Recording Video

Video may be recorded from the Provider Access Software Camera or the Patient Access Device Camera. Pictures:



- The adjustable video properties are zoom, focus, and brightness.

NOTE: These features may also be adjusted while recording.

- To start recording a video using the Patient Access Device Camera, click on the Video Record icon in the **Remote** Controls. To start recording a video from the Provider Access Software Camera, click on the Video Camera icon in the Local Controls.



- The Video Record icon will toggle to become the Stop Recording icon while a video is being recorded.
- Text will appear on the Patient Access Device Monitor screen which says **"Recording"**.

To turn off this "Recording" message on the Patient Access Device monitor, right click on the Video Record/Stop Recording icon in the **Remote** Controls and select **Do not inform viewers of recording**.



- The Video Record icon will toggle to become the Stop Recording icon while a video is being recorded.
- Text will appear on the Patient Access Device Monitor screen which says **"Recording"**.

To turn off this "Recording" message on the Patient Access Device monitor, right click on the Video Record/Stop Recording icon in the **Remote** Controls and select **Do not inform viewers of recording**.



Teladoc
HEALTH

24/7 Technical Support
+1 (877) 484-9119

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NOTE: The Video Camera icon will change appearance slightly to indicate this change in feature. (The red dot will disappear from the center of the circle in the upper right corner of the Video Camera icon.)

- To turn this message on again, right click on the Video Camera/Stop Recording icon and select **Inform viewers of recording**.
- To stop recording, click on the Stop Recording icon in the **Remote** Controls, or in Media Controls.

The Video Camera icon and the Stop Video icon in Media Controls will both toggle to the Stop Recording icon and will flash while a video is being recorded.

NOTE: The Patient Access Device cannot be manually driven while a picture is displayed in the **Remote** Camera View. Return to live video by clicking on the Stop Recording icon.