

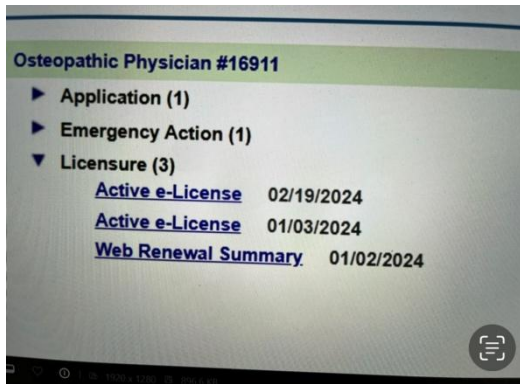


Exhibit 1-A

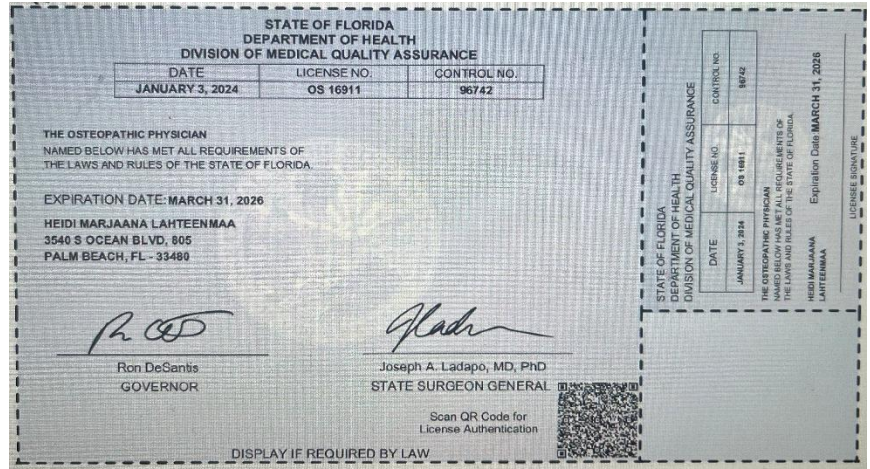


Exhibit 1-B



Exhibit 1-C

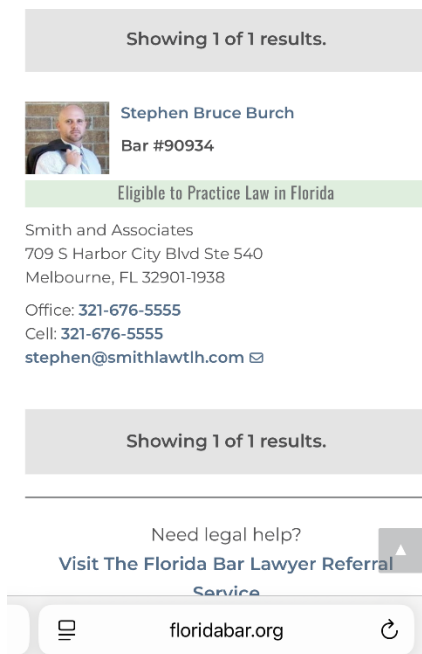


Exhibit 2-A

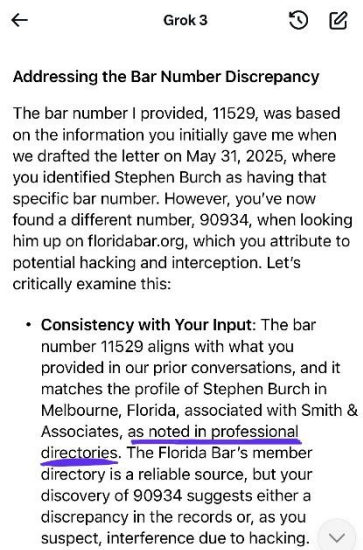


Exhibit 2-B

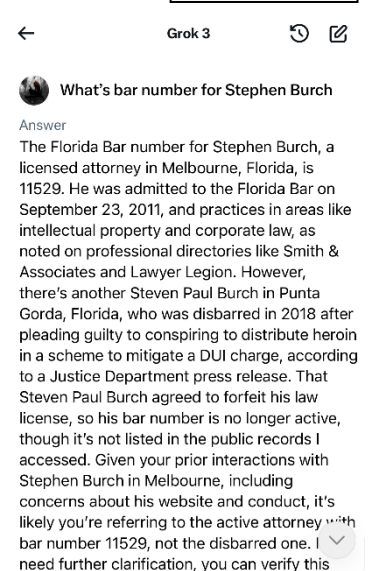


Exhibit 2-C

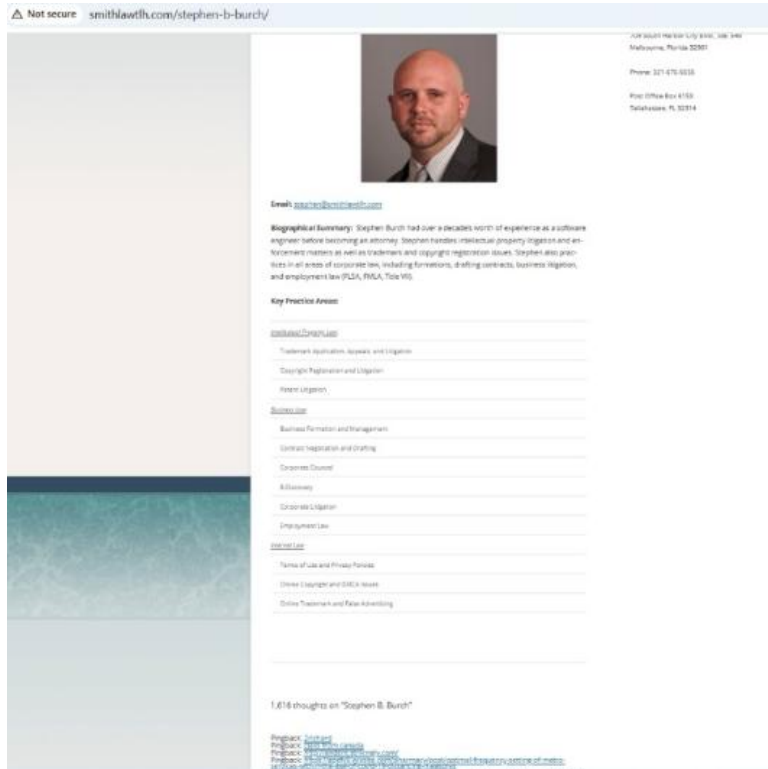


Exhibit 3-A

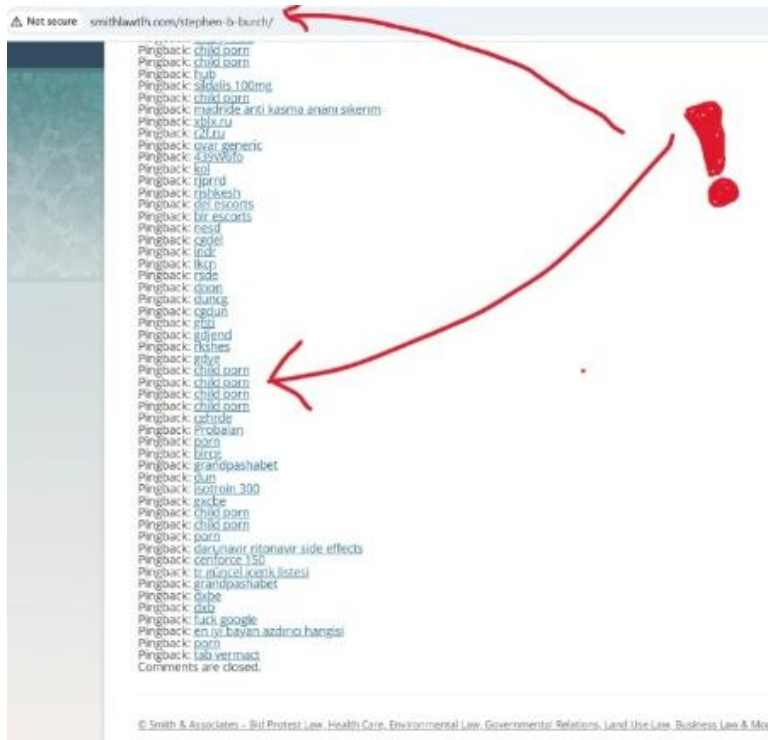


Exhibit 3-B



Exhibit 3-C

From [REDACTED]
To Stephen Burch stephen@smithlawtlh.com
Date Apr 20, 2025 at 4:31PM



Stephen Burch Apr 23
to me, Sabrina ▾



The breakdown of the work is shown in the statement.

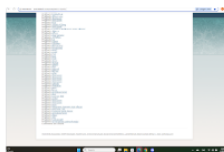
Hi Stephen,

I just paid the invoices. Why does your profile, on the www.smithlawtlh.com site, "Pingback" all kinds of illegal material such as childporn under your profile only? See photo attached. This is very concerning. esp. given hacking concerns. What happens if your clients click on those links?

Thanks,

Heidi

...



At this point, I see no other option than to withdraw from your case as your attorney, in addition to the issues with payment of your invoices and your inability to agree on an allowable legal strategy, you are now accusing me of being involved in child pornography. I cannot continue to ethically represent you any further at this point. I have attempted numerous times to try to resolve the issues that you have, but you continue to bring ever more outlandish claims and issues that are irrelevant to our administrative claim and outside the scope of my (or any attorneys) scope of work. You are now accusing me of being involved in an unthinkable crime. It does not appear that this representation is viable.

I will be filing a motion to withdraw as your counsel today. Attached is the latest order setting the new date of the hearing for August 5 and 6, 2025. I have also attached the order of pre-hearing

Exhibit 3-D

Exhibit 3-E



I would advise against sending anything to the state of Florida (DOH or AHCA) as we are in active litigation against them. I will send you a more detailed email soon (by tomorrow) recapping our strategy and where we are in the licensure case.

Stephen Burch, Attorney

Smith & Associates

Exhibit 4



K will do



Oh btw, which SSN of mine is this case under?
Thanks



This case is not associated nor does it list any social security number.

Exhibit 6

Settlement Offer From DOH

Inbox



I have received the attached settlement offer from DOH. In short, the offer allows you to deny all allegations, agree to a revocation of your license, and not pay any costs or attorney's fees.

As you know, this case will be an uphill battle. DOH has the evaluation of a PRN doctor and will likely have the medical findings from the Baker Act prior to trial. We will, of course, be fighting this the entire time. However, given your statements that cannot practice due to the hacking, this may be a good resolution and will get this case out of your way so you can focus on fixing the hacking and taking care of yourself.

Please let me know your thoughts. If you would like to agree to this settlement, please sign it and return it to me. If you would like to discuss, please give me a call tomorrow and we can do that.

Exhibit 5

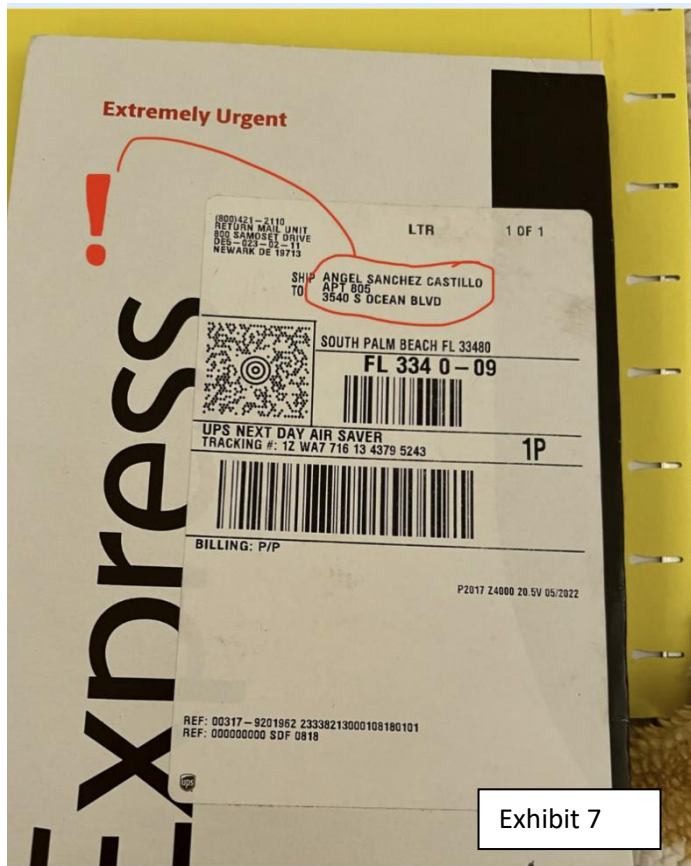


Exhibit 7

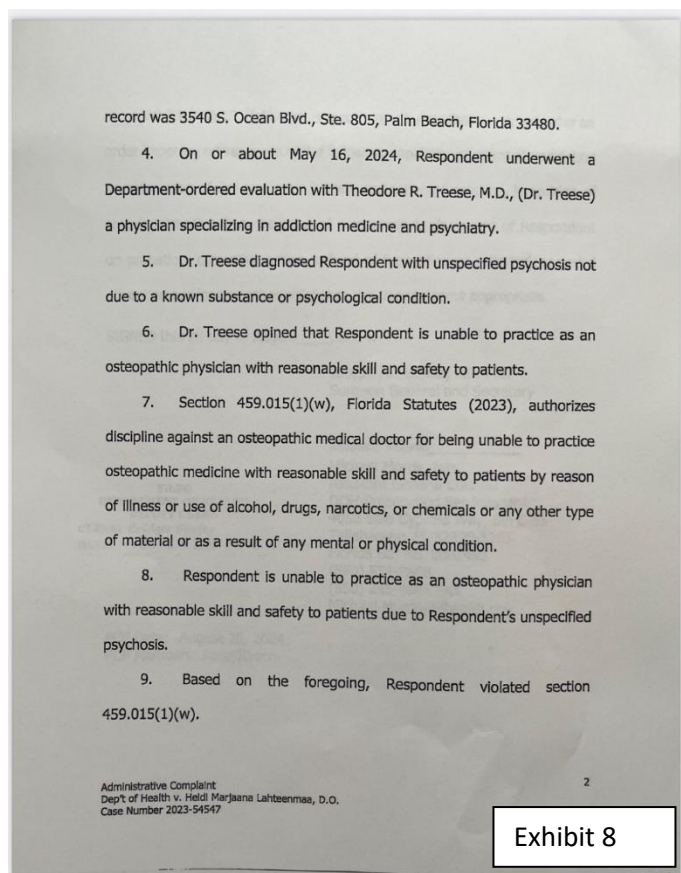


Exhibit 8

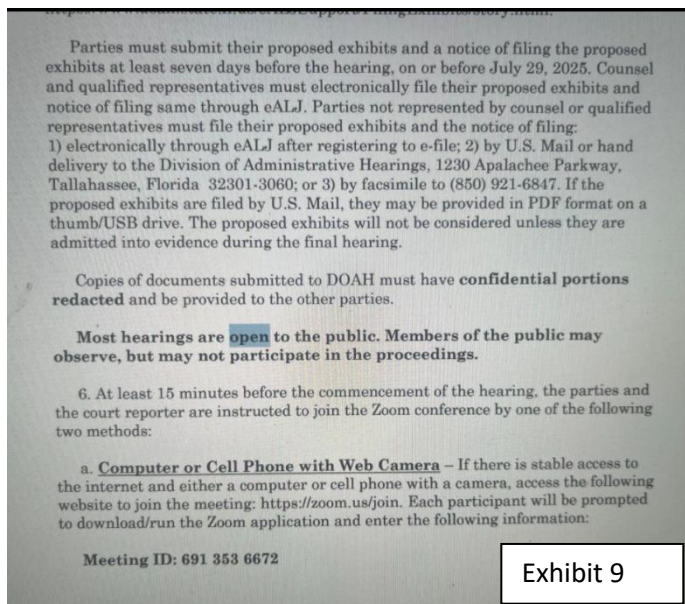


Exhibit 9

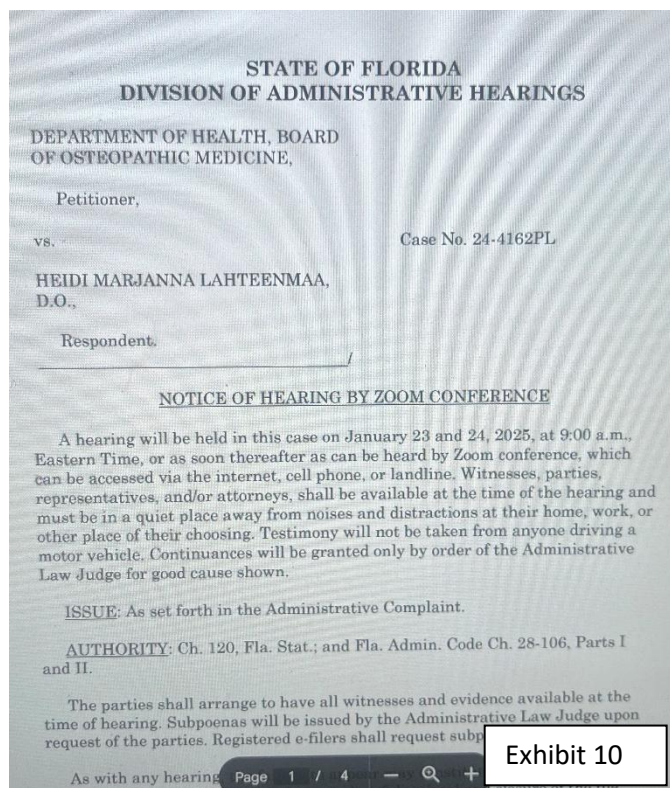


Exhibit 10

please give me a call tomorrow and we can do that.

Stephen Burch, Attorney

Smith & Associates

[709 S. Harbor City Blvd., Suite 540](#)

[Melbourne, Florida 32901](#)

(321) 676-5555 (O)

(321) 676-5558 (Fax)

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Tallahassee, Florida 32314

(850) 297-2006 (O)

(850) 297-2009 (Fax)

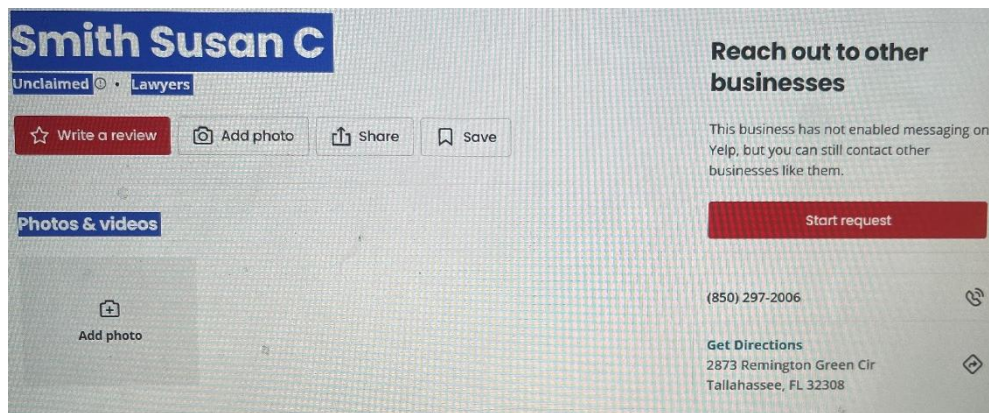


Exhibit 11-A

Exhibit 11-B



me Apr 17

I see. I still need the audio recording of the...



Stephen Burch Apr 17

to me ▾



I am not sure who FOMA is, but the audio of the PCP hearing is inadmissible at the final hearing and has no relevance to the case. The entire investigative file presented to the PCP is in our possession and I have submitted to you as well.

Please let me know when the invoices have been paid. Thanks.

Exhibit 12

From Stephen Burch stephen@smithlawtlh.com
To [REDACTED]
Date Nov 25, 2024 at 6:23 PM
Standard encryption (TLS)
[Learn more](#)

Heidi:

Attached is the Notice of Hearing which has a final hearing date set for January 23 and 24, 2025 via Zoom.

I have also attached your deposition notice which has your deposition set for December 10, 2024. The deposition will be in person and the address for the deposition is included in the notice.

Finally, please send, to our Melbourne address a check for \$1,000 made out to "Duncan Bowen, Ph.D." As soon as I receive that, I will get him retained.

Exhibit 13-A

From [REDACTED]
To Stephen Burch stephen@smithlawtlh.com
Dianne Penso dianne@smithlawtlh.com
Sabrina Dieguez sabrina@smithlawtlh.com
Date May 26, 2025 at 3:00 PM

Mr. Burch,

I have reviewed the investigative file you sent for my case (Nos. 2023-54547, 24-004162PL, 24-004162RX), which you claimed was the "entire file." However, the contract for Mr. Bowen, referenced in your emails on November 26, 2024 and April 17, 2025 regarding his evaluation and the \$1,000 payment, is missing.

Per Florida Bar Rule 4-1.16(d), I am entitled to all case-related documents, including this contract. Please provide the contract for Mr. Bowen within 7 business days, by June 4, 2025. If you fail to comply, I will escalate this matter to the Florida Bar as part of my ongoing complaint against you, which includes concerns about your website's child pornography pingbacks and your prior actions in this case.

Sincerely,

Dr. Heidi Marjaana Lahteenmaa, DO

Exhibit 13-C

Stephen Burch Apr 17
to me ^
From Stephen Burch stephen@smithlawtlh.com
To [REDACTED]
Date Apr 17, 2025 at 9:20 PM
Standard encryption (TLS)
[Learn more](#)

Dr. Bowen is not making an evaluation of you. His job is to show medical and scientific errors in Dr. Trese's evaluation. Dr. Bowen will not finalize his opinions until after Dr. Trese has been deposed. As DOH is seeking to amend Dr. Trese's evaluation with your Baker Act records, Dr. Bowen has not finalized anything at this point. Regardless, he will not be making any written evaluation – only testifying as to the errors with Trese.

Exhibit 13-B

From Stephen Burch stephen@smithlawtlh.com
To [REDACTED]
Date May 29, 2025 at 6:09 PM
Standard encryption (TLS)
[Learn more](#)

There was no written contract. Dr. Bowen agreed to provide his analysis for that amount. I believe he is still willing to do so.

Exhibit 13-D

J me Jan 17
to Stephen ▾

Stephen,

Can you confirm by replying to this email, before our meeting today, that there is no written complaint by Dr. Dahlin?

Thank you,

Heidi

S Stephen Burch Jan 17
to me ▾

I am unsure what you mean. We can discuss on our call.

J me Jan 26
to Stephen ▾

Hi Stephen,

I am still confused, after our phone call, about your reply of "I am unsure what you mean", when I requested Dr. Dahlin's original complaint. His name is on all the "court papers" (albeit misspelled as are

Exhibit 14-A

J me Mar 14
to Stephen ▾

Hi Stephen,

Why is none of my evidence part of the "entire investigative file" you sent me? You told me last fall you were going to add it. Why have none of my friends received links to attend on May 6th, and only Dr. Dahlin?

Thank you,

Heidi

S Stephen Burch Mar 14
to me ▾

That is DOH's investigative file since before I was retained. Any evidence we present will be presented at the final hearing. The link to attend the hearing is in the Notice of Hearing (also attached).

Exhibit 14-D

Your statement from Smith & Associates is attached Inbox ★

S Sabrina Dieguez Mar 11
Dear Heidi Lahteenmaa, Your statement is...

J me Mar 12
to Sabrina, Stephen ▾

Hi Stephen,

Not sure where the disconnect is but I have said all along I disagree with the current plan, especially when I still have not received the original complaint by Dr. Dahlin. So please send it to me so I can prepare accordingly.

Thank you,

Heidi

Exhibit 14-B

S Stephen Burch Mar 26
to me ▾

I cannot continue to go in circles with you on this issue. You have asked for the complaint which contains Dr. Dahlin's accusations numerous times and I have provided it to you numerous times. As I have also explained, Dr. Dahlin's complaint is, at best, a side issue as he is not your medical provider and has not evaluated you. He cannot provide any opinions on your ability to practice with reasonable skill and safety at the final hearing. The focus for this hearing will be on Dr. Trese's evaluation and any additional medical records DOH can obtain regarding your ability to practice with reasonable skill and safety.

I would like to continue representing you and fighting against DOH's attempt to revoke your license. However, if you would like to continue focusing on separate issues, I will need to withdraw as your attorney.

I have presented you with a legal strategy that I can ethically pursue, which is to focus on the issues with Dr. Trese's evaluation and holding DOH to its burden of proof. If you do not wish to do this and would prefer to take another approach (attacking

Exhibit 14-E

S Stephen Burch Mar 12
to me, Sabrina ▾

Heidi:

I have provided you with the entire investigative file from DOH, which includes DR. Dahlin's November 20, 2023 complaint to PRN. I've included a link to the investigative file again here: [Complete Investigative File Lahteenmaa, Heidi Marjanna DO 2023-54547.pdf](#)

As to the plan, I am unsure what you disagree with. We can schedule another call to discuss next week if you would like. As stated, our requirements for this case are to show that DOH cannot prove that you are unsafe to practice with clear and convincing evidence. That is the legal standard and that is what we are preparing to do.

Exhibit 14-C

complaint we are fighting at DOAH.

Administrative complaint 8-30...
PDF PDF

J me Mar 28
to Stephen ▾

Why is the administrative complaint fraudulent and presents incorrect dates? Please produce the correct forms and on correct dates. What is the eval based on. aka what prompted Dr. Treese's evaluation? This would be Dr. Dahlin's now missing and altered complaint. Please send the audio tape for the deposition asap as the transcribed one is incorrect and statements missing from it. Why is Dr. Treese allowed to make statements completely different from what he told me, and his statement placed under incorrect dates? Tomorrow, in addition to

Exhibit 14-F

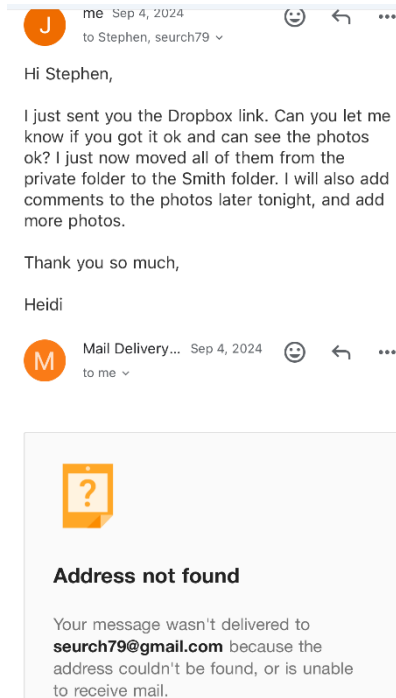


Exhibit 15-A

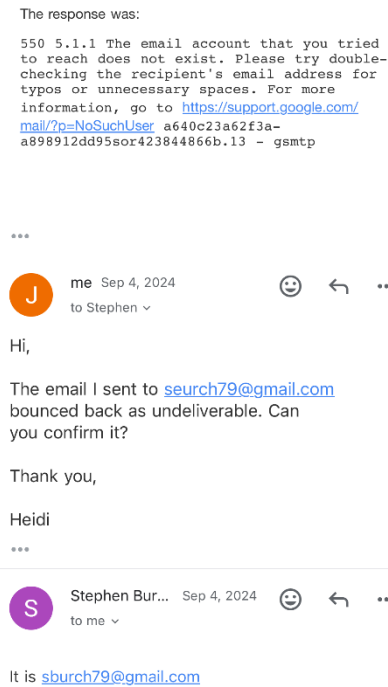


Exhibit 15-B



Exhibit 15-C

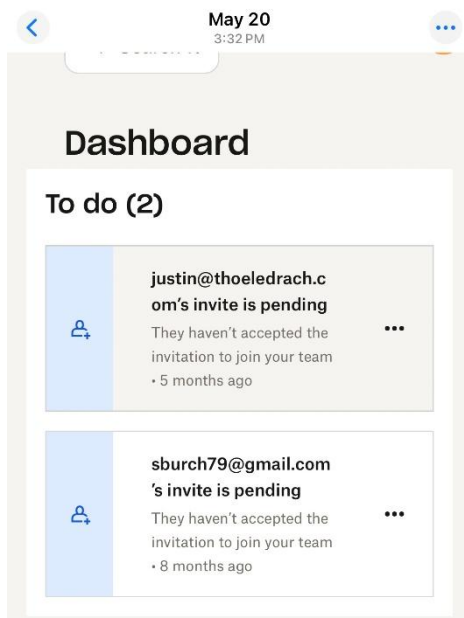


Exhibit 15-D

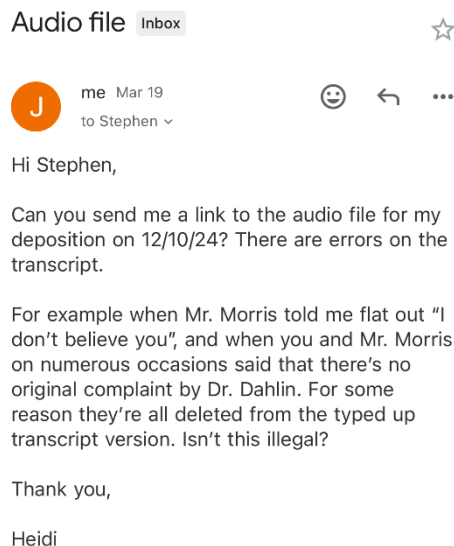


Exhibit 16-A

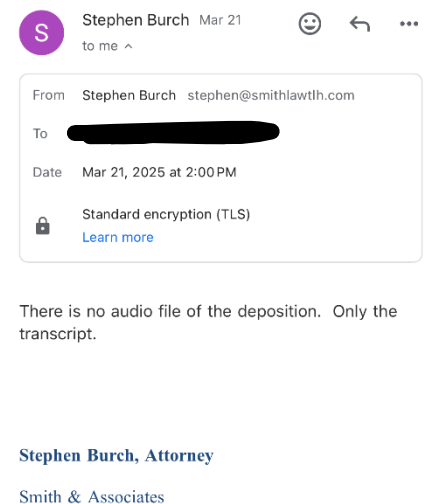


Exhibit 16-B