

Allegations of Government Misconduct

For the Criminal Complaint Against U.S. FBI, and Florida DOH and Dr. Robert Dahlin for Torture, Cybercrimes, False Imprisonment, and Conspiracy

I allege that the following actions by the U.S. government or its agents constitute a pattern of misconduct that undermines these proceedings and justifies a stay:

1. Constitutional Violations and Unlawful Restraint of Liberty

This category includes government actions that infringe on constitutional rights, such as unlawful detention, communication control, denial of counsel, and coercive tactics that involve restraint, isolation, or retaliation that isolate and harm me. These violations justify a stay due to their severe impact on my ability to participate in proceedings and defend myself, especially as they involve retaliation or criminal misconduct.

• Cyber Torture and Communication Control:

I have been subjected to cyberstalking, harassment, and electronic surveillance abuse by the U.S. government, potentially constituting torture under international law (UN Convention Against Torture, Article 1). Attached evidence represents only a portion of the documentation detailing the government's "cybercaging" of my communications for over 2.5 years. This includes blocking messages and canceling my biopsy through illegal wiretapping (18 U.S.C. § 2511) and unauthorized access to protected computers (18 U.S.C. § 1030). The cancellation of my health insurance and biopsy during cyberattacks demonstrates economic coercion and medical neglect by state actors. Controlling communications and causing medical/economic harm directly aligns with unconstitutional restraint of liberty and privacy violations. These actions may also violate the UN Convention Against Torture (Article 1) due to FBI-orchestrated cyberattacks. Furthermore, cyber gangs, are involved with government knowledge (e.g., direct contact, RansomHub, Wu), which may constitute negligent Failure to Protect or Duty of Care, Baiting or "Controlled Operations", Abuse of Power or Misconduct and/or Violation of Privacy Rights.

• Coercive Task Endurance:

Government actors encouraged me to perform mindless, repetitive tasks, such as clicking specific buttons on a computer for hours and opening up to 360 identical windows daily in a specific order, among other tasks. Once I clicked a Teladoc clock Q5 minutes for >12 hours straight. These tasks, often consuming up to 16 hours per day for over a year, were a form of harassment or psychological coercion, leaving me exhausted and distressed and restrict my mental and physical liberty, aligning with constitutional violations and unlawful restraint.

• Psychotronic torture (severe):

The FBI allowed, or orchestrated in retaliation, drainage of sewage into my apartment for over six months, concurrently cut air conditioning in Florida Summer heat, allowed loud drilling (~110 dB) on the roof above, and severed most communication, transportation, internet, and phone access to trap me as a prisoner from Jan 2023 – Jan 2025, until I left

the country. In addition, they allowed my health insurance cancellation, knowing I needed a breast lump biopsy and had low hg of 9.1L worsening the effects of this severe form of psychological and environmental torture. They also made me clean up their sewage mess by myself, and rip the carpet out with a razor blade, right in front of them as they were witnessing this being that I was under 24-7 intense surveillance. They blocked me from sending the samples to the environmental toxins lab.

The combination of these actions—sewage exposure, heat, noise torture, and isolation—aligns with modern torture techniques that use environmental, sensory, and digital manipulation to break victims without physical scars, as seen in CIA methods or political repression in authoritarian regimes (e.g., Turkey, 1980s, per Basoglu). The FBI's alleged orchestration (e.g., via ISPs, device control, Uber blocks) on Portuguese soil suggests a coordinated, state-sponsored campaign, potentially to conceal a Teladoc investigation.

Comparison to Historical Torture: The tactics mirror Vietnam War POW methods (isolation, degradation) and Guantanamo's psychological torment (noise, isolation), classified as torture under UNCAT.

By the time I got to Lisbon, Portugal, I was so weak that I was passing out from constant torment of over 2.5 years. Thankfully, with the help of Policia Judiciária and Interpol, I finally got medical help for anemia.

Draining Sewage into Apartment (6 Months):

Type: Environmental Torture. Deliberately introducing sewage into my living space creates a hazardous, unsanitary environment, exposing me to toxic pathogens, foul odors, and health risks. This is a form of “degrading treatment” designed to humiliate and destabilize, akin to tactics used in detention settings to break prisoners (e.g., Guantanamo's use of unsanitary conditions, Amnesty International, 2006).

Psychological Impact: Prolonged exposure to sewage induces chronic stress, anxiety, and revulsion, contributing to mental collapse. Studies like Basoglu (2009, Torture and Its Consequences) note that degrading environments amplify PTSD risk, especially when combined with isolation.

Legal Framework: This violated the UN Convention Against Torture (UNCAT), Article 1, which defines torture as intentional infliction of severe mental or physical suffering for purposes like coercion or punishment. It also breaches the EU Charter of Fundamental Rights, Article 4 (prohibiting torture and inhuman treatment), and Portuguese law (e.g., Penal Code, Article 152-A, on inhuman treatment).

Cutting Air Conditioning (Simultaneously):

Type: Environmental Manipulation. Disabling air conditioning, especially in a top-floor apartment during Florida summer, creates unbearable heat, exacerbating physical

discomfort and health risks, particularly given my anemia and blocked medical care (e.g., canceled biopsy). This mirrors tactics used in CIA “enhanced interrogation” (e.g., temperature extremes, Senate Intelligence Committee Report, 2014).

Psychological Impact: Extreme heat induces fatigue, dehydration, and cognitive impairment, compounding distress from sewage exposure. It aligns with sensory manipulation to weaken resistance (Lifton, 1986, *The Nazi Doctors*).

Legal Framework: The cutting of air conditioning, especially in a top-floor apartment during Florida’s blistering summer heat from January 2023 to January 2025, violated U.S. laws (§ 1983, § 2340, housing standards), constituting cruel and unusual punishment, torture, and civil rights abuses. As a Finnish/EU citizen, international laws (UNCAT, ICCPR, ECHR) were breached, highlighting the U.S.’s failure to protect me from inhuman treatment on its soil, a violation intensified by my dual citizenship status.

Drilling on Roof (110 dB, Throughout the Day):

Type: Sensory Overstimulation/Noise Torture. Continuous 110 dB drilling (equivalent to a jackhammer or jet engine) exceeds safe noise levels (OSHA: 85 dB for 8 hours causes hearing damage). This deliberate noise pollution disrupts sleep, concentration, and mental stability, a tactic used in psychological torture to disorient and exhaust (e.g., Guantanamo’s use of loud music, UNCAT reports).

Psychological Impact: Chronic noise exposure causes severe stress, anxiety, and potential hearing loss, amplifying PTSD risk (Steel et al., 2009, *The Lancet*). Basoglu (2009) notes sensory overstimulation as a hallmark of torture, doubling mental health deterioration when paired with isolation.

Legal Framework: The drilling on my roof at 110 dB throughout the day, from January 2023 to January 2025, even on the days when there was supposed to be no maintenance, violated U.S. laws (§ 1983, § 2340, noise pollution regulations), constituting sensory torture, cruel and unusual punishment, and civil rights abuses. This relentless noise, exceeding OSHA’s 85 dB safety threshold, disrupts sleep, concentration, and mental stability, amplifying my PTSD risk (Steel et al., 2009), and was a deliberate tactic to disorient and exhaust me. As a Finnish/EU citizen, international laws (UNCAT, ICCPR, ECHR) were breached, underscoring the U.S.’s failure to safeguard me from degrading treatment, a transgression worsened by my foreign nationality.

Cutting Communication, Transportation, Internet, and Phone:

Type: Sensory Deprivation and Social Isolation. Severing all communication (internet, phone) and transportation (e.g., Uber blocks) traps me in a “cybercage” and physical isolation, preventing escape or help. This mirrors CIA black site tactics (e.g., isolating detainees to induce helplessness, Senate Report, 2014).

Psychological Impact: Total isolation from social and digital networks causes profound loneliness, paranoia, and despair, doubling PTSD and suicidal ideation risks (Basoglu, 2009). Social betrayal (e.g., FBI weaponizing colleagues) amplifies this trauma, akin to Vietnam War POW tactics (McCain, 1999).

Legal Framework: This violates the ECHR, Article 8 (right to private life), GDPR (unauthorized communication control), and the Portuguese Constitution, Article 26 (privacy). It also aligns with cybercrime under Law No. 109/2009 (unauthorized access to systems) and may constitute false imprisonment (Penal Code, Article 147)."

• Psychological Torture; Incitement to Suicide

The act of repeatedly urging me to jump off a balcony, as the FBI allowed or did through hacked phones, is classified as psychological torture and specifically a form of incitement to suicide or coercive verbal abuse designed to destabilize and destroy my mental state.

The FBI's use/allowance of hacked phones to repeatedly urge me to jump off a balcony from January 2023 to April 2025, and telling me I will die, constitutes psychological torture through incitement to suicide, a deliberate tactic to exploit my vulnerability within a "psychotronic gulag." This coercive verbal abuse, akin to Guantanamo's psychological tactics (Basoglu, 2009), aims to induce mental collapse or death, likely to silence my Teladoc whistleblowing, often causing severe PTSD and suicidal ideation (Steel et al., 2009).

Its life-threatening severity violated U.S. laws including 18 U.S.C. § 2340 (torture), 42 U.S.C. § 1983 (cruel punishment and due process), and 18 U.S.C. § 241 (conspiracy against rights). As a dual Finnish-American citizen, this also breached international laws: UNCAT Article 1 (torture), ICCPR Article 7 (cruel treatment), ECHR Article 3 (prohibition of torture), and Vienna Convention Article 36 (consular notification failure), highlighting the U.S.'s failure to protect me on its soil and marking it as a heinous war crime-level act.

• Cybercage and Social Isolation:

The government exercises complete control over my devices through network-level controls, device-level surveillance, communication interception, network segmentation, and cooperation with ISPs and telecom providers, and other means. These actions prevent me from freely communicating and manipulate or coerce my social support network, creating a "cybercage" that isolates me and violates my First and Fourth Amendment rights.

Further, the FBI did not only isolate me. They weaponized my social network transforming previously positive support into negative attacks on my credibility and mental stability. Studies on war torture, such as those involving survivors of political repression in Turkey during the 1980s, demonstrate that social betrayal compounds trauma, leading to severe PTSD, depression, and suicidal ideation (Basoglu, 2009). The "cybercage" creating social isolation is a clear example of unconstitutional restraint, directly impeding my constitutional rights.

• **Baker Act and Forced Detention:**

I was falsely imprisoned via the Baker Act (Fla. Stat. § 394.451–394.47891) after seeking FBI/NSA assistance for hackers cancelling my health insurance, an abusive, retaliatory act lacking medical justification. The FBI's role and DOH's "delusional" label suggest malicious prosecution, with fabricated diagnosis implied by billing discrepancies and falsified and incomplete documents. I was held 5 days at Delray Medical Center with illegal BA-52, no BA-32, denied a social worker and lawyer, with friend Angela Nida illegally assigned as proxy without consent, forced antipsychotics that were not justified, threatened and blackmailed. Admitted without insurance or SSN, slapped with a \$~50 000.00 bill, yet discharge shows unknown payment, despite mentioning no insurance, hinting at a coverup. Forced detention without legal basis is a direct violation of liberty.

• **Denial of Counsel:**

The U.S. government violates my Sixth Amendment Right to Counsel (U.S. Constitution) or Due Process under the Fifth and Fourteenth Amendments, and in DOAH cases, Florida Statutes § 120.569(2)(a) implies this right. The government obstructs justice (18 U.S.C. § 1503) by preventing me from securing a lawyer via interference (e.g., communication control). This violates due process (Goldberg v. Kelly, 397 U.S. 254, 1970), leaving me, a pro se litigant, vulnerable to DOAH's complex procedures, increasing the risk of prejudice, and hindering my ability to unravel these actions. Denial of counsel is a constitutional violation that restricts my liberty to defend myself.

• **Witness intimidation**

Forced Testimony Against Teladoc and Possible Organized Crime Elements/Mafia in Open Court via Zoom is direct witness intimidation. DOH's subpoena, without a certified copy or affidavit, delivered to my email despite DOH's acknowledgment of my compromised networks, violates process. It coerces testimony against Teladoc under duress, violating due process.

The FBI's unconscionable coercion and compelled self-incrimination (Fifth Amendment) force me to testify without counsel against a \$2.6 billion corporation (2023 revenue, 80 million users), with life-threatening risks (e.g., whistleblower deaths like John Barnett, 2024). Lack of protection (e.g., witness security) suggests government complicity, especially with possible Teladoc/organized crime and mafia ties. Some of my witnesses refuse to testify, due to these risks, a reaction I cannot blame them for. Witness intimidation restricts my constitutional right to a fair defense, aligning with unlawful restraint of liberty.

• **Coercion Using Medical License:**

The U.S. government withholds my license to coerce me to return to the U.S and appears intended to pressure me into compliance with unlawful demands, further exacerbating financial and professional harm. I am also coerced to give up my medical license indefinitely, without trial, in exchange for not having to pay DOH legal fees, exacerbating financial harm. Coercion through license withholding is an unconstitutional restraint on my professional and personal liberty.

• **Systematic Entrapment and Coercion Campaign/ Government-Sanctioned Retaliatory Campaign or State-Sponsored Persecution:**

The FBI, under the Biden administration, deliberately manipulated to entrap me into a legal or psychological trap after I stumbled upon a sloppy Teladoc investigation.

Government involvement to protect the seal by any means might violate the Whistleblower Protection Act (5 U.S.C. § 2302(b)(8)) or Florida Whistleblower's Act (Fla. Stat. § 112.3187), which protect against retaliation for reporting fraud. The government orchestrated a systematic effort to coerce me (e.g., fabricated complaints, cyber manipulation), as state actors created conditions to incriminate or incapacitate me. Using Dr. Robert Dahlin (whose father is a federal agent) and his initial fabricated complaint—never provided to me—along with family and colleague coercion, and illegal psych detention for 5 days without BA-32 and with illegal BA-52, support conspiracy claims under 18 U.S.C. § 241. This campaign directly violates constitutional rights through retaliatory restraint and persecution.

• **Constructive Entrapment:**

Respondent or affiliated government entities use hacked or government-controlled devices, to manipulate circumstances for adverse action. Constructive entrapment through device control is a constitutional violation that restricts my liberty and fair process and violates due process and Fourth Amendment protections against unreasonable seizures. This entrapment prejudices my defense, necessitating a stay to investigate and address the manipulation.

2. Abuse of Administrative Authority and Procedural Irregularities

This category encompasses actions by the FL DOH or related state actors that involve misuse of administrative power, procedural errors, or fabrication of evidence, undermining the legal foundation of their case. These issues justify a stay of proceedings due to the FL DOH's failure to adhere to statutory requirements, falsification of records, and potential retaliation, which prejudice my ability to defend myself fairly.

1. Illegal License Issuance and Catastrophic System Glitch:

The FL DOH issued my license (OS16911) on January 3, 2024, as evidenced on mqa-internet.doh.state.fl.us, without requiring mandatory attestation questions—a process that prevents submission without completion, per Fla. Admin. Code R. 64B15-6.003. Public records indicate I bypassed the following questions: “Other Health-Related Degrees: The practitioner did not provide this mandatory information,” “Graduate Medical Education: The practitioner did not provide this mandatory information,” and “Final disciplinary action taken by a specialty board within the last 10 years: The practitioner did not provide this mandatory information pertaining to final disciplinary action taken by a specialty board within the last 10 years”.

A second issuance occurred on February 17, 2024, following an address change per FL DOH. Per Ellen LeGendre Carlos, Interim Chief Legal Counsel from FL DOH, on July 21, 2025, "It appears that a new license was issued in February due to the attached requested address change submitted on February 16, 2024". I recall reapplying due to the attestation box bypass. The first license was not deleted, and the system created a duplicate with a different issue date and control number. Ellen offered no explanation, and showed no concern, why the first license was not deleted, seemingly normalizing the illegal license duplication with every update.

This breach of statutory procedure (Fla. Stat. § 459.008) and the potential for infinite illegal licenses due to a system glitch render the license void ab initio. A cybersecurity breach claimed by RansomHub in June 2024, involving 100 gigabytes of stolen data, may have compromised the FL DOH's licensing system, potentially contributing to the error. If not due to cyber interference, this reveals a glitch so severe that the DOH's system operates like a candy machine, spitting out illegal licenses. This undermines the system's integrity, as minor updates could trigger infinite issuances, all with different active time periods, violating Fla. Stat. § 459.008's single-license mandate.

The FL DOH's issuance of an illegal license without attestation, amidst cyber interference/attacks, reissuance due to system errors, and use of falsified or omitted records to prosecute suggests manipulation to frame me as practicing while "impaired," further supporting my claim of retaliation, and violate administrative law principles, including Florida Statutes § 120.57(1)(e) and § 459.008, constituting procedural irregularities and abuse of authority.

• **Discrepancy in Records:**

On July 21, 2025, Ellen LeGendre Carlos from the FL DOH emailed me a copy of my renewal application dated January 2, 2024, asserting that I attested to all requirements (marked "Yes"), yet the online record on mqa-internet.doh.state.fl.us for the January 3, 2024, issuance indicates that some attestation questions were not asked. The stark contrast between Ellen's emailed record (asserting attestation) and the online data (showing incomplete attestation) suggests either a colossal system failure or deliberate falsification, reflecting administrative misconduct and procedural flaws by the FL DOH.

Further, In the records provided by Ellen, the entire set of attestation questions is omitted, displaying only the final attestation statement requiring certification that I fully and accurately completed the application and that "I have carefully read the questions in the foregoing application and have answered them completely". This statement warns of disciplinary or criminal penalties for false information and requires notification of status changes within 30 days. The omission of the attestation questions, coupled with the broad certification requirement, raises concerns about procedural fairness and potential entrapment. Despite my inquiries to Ms. Carlos and Mr. Morris about this matter, I have received no response. Omitting attestation questions in provided records, while requiring broad certification, and ignoring inquiries suggest procedural unfairness and potential entrapment, constituting administrative abuses by the FL DOH.

The omission of the attestation question sent by Ellen LeGendre Carlos, paired with no response to my inquiries, piques my interest regarding the content of those omitted responses. This goes far beyond lackluster performance or mere incompetence, raising grave concerns about her intent and professional integrity. Furthermore, it is utterly absurd and potentially illegal for her to send me false and/or incomplete records that starkly contradict the public records, an act that may violate Fla. Stat. § 817.49 (false information by a public officer) possibly escalating this to criminal misconduct. Such a misrepresentation or error invalidates the DOH's case and reinforces the illegal issuance. Failing to respond to my inquiries reflect deliberate misconduct and procedural irregularities by FL DOH officials, undermining the case's validity.

This is a procedural nightmare that undermines the DOH's credibility, especially when they dismiss my hacking concerns as "delusions" while ignoring Ransomhub's later 100 GB breach claim (August 30, 2024). It indicated administrative cover-up, procedural misconduct by the FL DOH, an ongoing government-sealed investigation, entrapment and/or retaliation for my Teladoc whistleblowing prejudicing fair proceedings.

• Retaliation and Isolation to My Account:

This glitch affects only my account, with the creation of new licenses without deleting the previous ones, not constituting a statewide policy, as the DOH has failed to confirm otherwise despite my inquiries. The exclusivity to my account, amid 2.5 years of torment since my Teladoc whistleblower disclosure, strongly suggests retaliation and targeting, rendering prosecution by the FL DOH baseless on a compromised system.

• Framing and Entrapment

The FL DOH's actions—issuing an illegal license, using it as the basis for prosecution, fabricating or omitting records, ignoring my inquiries, and persisting in prosecuting me despite their own failures—create a legal and ethical quagmire. Florida Statutes § 120.57(1)(e) mandates dismissal when an agency's action lacks evidentiary or legal support, a requirement underscored by the FL DOH's unreliable systems and discredited allegations. Accordingly, the FL DOH's failure to maintain system integrity and rectify these irregularities renders its prosecution unsustainable.

• Ongoing Torment and Refusal to Explain:

The isolation of this malfunction to my account, after 2.5 years of torment—including threats of legal fees if I lose on August 5–6, 2025—suggests retaliation linked to my Teladoc whistleblowing. The DOH's audacity in prosecuting me over a license they illegally issued, while refusing to investigate system flaws or cyberattacks, defies fairness. Despite my recent detailed questions to Ellen LeGendre Carlos and Michael Morris regarding bypassed attestations, multiple licenses, and account-specific issues, the DOH has refused to respond, dismissing my inquiries as irrelevant or vague. Additionally, I have sent numerous emails to the Florida Board of Osteopathic Medicine at MQA.Osteopath@flhealth.gov, yet I have received no response. This silence from all parties obstructs my defense and underscores a system incapable of ensuring fair proceedings.

Labeling me as “delusional,” “severely psychotic,” and “impaired” without a Florida Statutes § 90.603 evaluation, for raising concerns about hacking—only for Ransomhub to later claim a breach around July 2024—is an irony so profound it borders on Kafkaesque.

• **Withheld and tampered evidence and creation of 2 separate file systems:**

Evidence withholding forces me to seek records from Teladoc, the company I whistleblowed against. Additionally, it is evident that two separate files have been created: one true and notarized file and one holding fabricated, unnotarized evidence, portraying incorrect dates and data. Additionally, I have two Social Security Numbers, a Florida license with two different dates of issuance, and I am classified as both an MD and DO. Fabricating or tampering with records to support a case against me is a clear abuse of authority.

• **Impaired Claim and Subpoena:**

Respondent subpoenaed me to testify on August 5–6, 2025, via a hacked Zoom network, despite claiming I’m “impaired”, a contradiction under § 90.603, which requires a competency evaluation for such an accusation. No evaluation has been conducted, and I lack counsel due to interference. The hacked delivery method and lack of a certified copy or affidavit taint the subpoena, suggesting coercion, rather than legitimate process, to silence my Teladoc expose, possibly tied to a sealed investigation. Legally, if I am impaired, the Florida Department of Health (DOH) should appoint a guardian or halt communications, per § 90.603 and Impaired Practitioner Program (IPP) protocols. Sending materials assumes capacity, contradicting their narrative and again suggesting alternative motives. The FL DOH’s improper subpoena process and contradictory claims about my competency are administrative abuses that undermine the legitimacy of their case.

• **Coerced Professional Misconduct:**

The government has coerced psychiatrists to violate American Psychiatric Association (APA) guidelines by diagnosing psychosis without evidence (e.g., ignoring proof of hacking), contributing to the defamation campaign and undermining my credibility. This is documented extensively in my 10 diaries, as well as numerous screenshots, over the past 2.5 years. The involvement of neurosurgeon Dr. Robert Dahlin (whose father is a federal agent), and him making absurd claims of psychosis while admitting to hacking, is irregular. The FL DOH’s involvement in coercing false diagnoses to support their case is an abuse of administrative authority, directly tied to fabricating evidence.

Psychotronic Gulag:

Social Network Betrayal as Psychological Torture:

The FBI has engineered a “psychotronic gulag” by weaponizing my social network—turning colleagues, including a friend who witnessed Teladoc subpoena and hacking, against me to gaslight me as “delusional” and report me to the medical board, framing me as unstable. This betrayal, documented over 2.5 years with 100,000 photos, compromised devices, and diaries, transforms trusted support into a source of torment, amplifying isolation beyond standard confinement. War torture studies (Basoglu, 2009; Lifton, 1986) show such social betrayal—mirroring Nazi experiments and Guantanamo tactics—doubles PTSD risk, leading to mental collapse or death, especially under my conditions of anemia (Hg 9 g/dL),

sewage exposure from retaliation, and blocked medical care (e.g., canceled breast lump biopsy). The FBI's 24/7 surveillance, cybercaging (fake internet, locked drives), physical tailing, and Uber blocks create a life-threatening environment, violating EU Charter Article 4 (no torture) and Article 47 (fair trial), necessitating a stay to halt this war crime-level persecution.

• **State-Sponsored Public Defamation/Slander:**

The government has orchestrated a systematic campaign of public defamation and slander, falsely portraying me as psychotic, with planted evidence, to discredit me and conceal the Teladoc investigation, causing severe reputational harm, inherently damaging to my profession as a physician. My medical license was pulled publicly, with accusations of "unspecified psychosis," and "delusions and paranoia about electronics and of being bugged and hacked" on a publicly available "Order of Emergency Restriction of License" by Joseph A. Ladapo, MD, PhD, State Surgeon General. The FL DOH's role in orchestrating defamation through official channels (e.g., public license restriction) is administrative abuse tied to a fabricated case.

• **Potential Bias in DOAH Proceedings: Potential Bias in DOAH Proceedings:**

DOAH's government affiliation may compromise impartiality necessitating investigation.

END OF DOCUMENT -----

CURRENT LIST AS OF AUGUST 30, 2025 – SUBJECT TO UPDATES