

Heidi Lahteenmaa

Nane Los Inc.

[REDACTED]

The Florida Bar

651 E Jefferson St
Tallahassee, FL 32399

May 31, 2025

Subject: Formal Complaint Against Attorney Stephen Burch (Bar Number 90934)

Dear Florida Bar Disciplinary Committee,

I am writing to file a formal complaint against Stephen Burch, a licensed attorney at 709 S. Harbor City Blvd., Suite 540, Melbourne, Florida 32901 (Bar Number 90934), for multiple ethical violations that have caused significant harm to my defense in an administrative case involving my medical license (OS 16911) with the Florida Department of Health (DOH). These violations include sabotaging my case, potentially misappropriating funds, withholding case documents, failing to maintain professional standards as evidenced by child pornography pingbacks on his website, and a litany of additional misconduct that demonstrates gross negligence, unprofessionalism, and disregard for my safety and rights as a client.

Background of Representation

I retained Mr. Burch to represent me on Aug 27, 2024, in an administrative complaint filed by the DOH (Case Nos. 2023-54547, 24-004162PL, 24-004162RX), which I believe is a fabricated retaliation for my whistleblowing on Teladoc Inc. in January 2023. Mr. Burch was hired to defend my medical license, but his actions have instead prejudiced my case and caused me significant financial and emotional distress.

Violations of The Rules Regulating The Florida Bar

Rule 4-1.3 (Diligence) and Rule 4-1.4 (Communication) – Failure to Obtain and Disclose the Non-Existent Original Complaint

For over a year, I have requested the original complaint allegedly filed by Dr. Robert Dahlin, DO, of St. Luke's Neurosurgery, 1012 E. 2nd St, Duluth, MN 55805, from both Mr. Burch and the Florida DOH. Despite my repeated requests, it was never provided to me (Exhibit 14-A, 14-B, 14-C, 14-D, 14-E, 14-F). During my deposition on December 10, 2024, both Mr. Burch and Mr. Morris of the Florida DOH stated that there is no original complaint by Dr. Dahlin, a critical piece of information that undermines the legitimacy of the entire DOH case against me (Exhibit 16-A). Shockingly, the written transcript of this deposition was altered, and on March 28, 2025, he informed me that "there are no audio files for the deposition," depriving me of critical evidence needed for my defense to challenge the DOH's actions

(Exhibit 16-B). Additionally, the initial complaint file from the Florida DOH was sent to my address but was addressed to “Angel Sanchez Castillo,” an individual I do not know (Exhibit 7). The Florida DOH later admitted this was the original packet, but I never opened it as it was not addressed to me. This misaddressing breached the confidentiality of my case by potentially exposing sensitive information to an unknown third party, a serious violation of my privacy rights. They refused to disclose where my actual original packet was sent, again providing no proof of delivery or signature, likely further violating the confidentiality of my case and obstructing my ability to prepare a defense. Mr. Burch’s failure to diligently pursue and disclose this non-existent complaint, coupled with his inaction regarding the misaddressed packet, violated my right to a fair defense and constitutes a severe breach of his duty to act with reasonable diligence and keep me informed.

Rule 4-1.3 (Diligence) and Rule 4-1.4 (Communication) – Failure to Provide Information on Probable Cause Panel (PCP) Hearing

I have never received copies or information about a Probable Cause Panel (PCP) hearing, which I am entitled to as part of due process in the Florida DOH administrative complaint process (Exhibit 12). The PCP hearing is a critical step in determining whether there is sufficient evidence to proceed with a formal complaint, and my right to access this information is essential for preparing my defense. Mr. Burch’s failure to provide any details or documentation about the PCP hearing further obstructed my ability to defend myself, violating his duty to act with reasonable diligence and to keep me informed about significant developments in my case.

Rule 4-1.1 (Competence) and Rule 4-1.3 (Diligence) – Failure to Provide Expert Testimony Rule 4-1.3 (Diligence) and Rule 4-1.4 (Communication) – Inconsistent Statements and Failure to Clarify Expert Testimony Role, Rule 4-1.15 (Safekeeping Property) – Potential Misappropriation of Funds

Mr. Burch’s failure to ensure that Dr. Bowen, whom I wrote a check for \$1,000 to retain as an expert witness, provided a written evaluation or finalized his opinions in a timely manner severely prejudiced my defense. On November 25, 2024, Mr. Burch instructed me to send a \$1,000 check to “Duncan Bowen, Ph.D.” at his Melbourne office to retain Dr. Bowen as an expert to challenge the DOH’s evaluation of me, and I complied, expecting Dr. Bowen to provide critical testimony (Exhibit 13-A). On April 17, 2025, Mr. Burch emailed me stating, “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). Of note, Mr. Burch misspelled Dr. Treese’s name, calling him Trese. Dr. Treese’s falsified “Independent Medical Examination” is also incorrectly dated 05/16/24 when the insufficient and incomplete “eval” was performed on 04/16/24 (Exhibit 8). Mr. Burch failed to diligently clarify how the Florida DOH could amend Dr. Trese’s evaluation with my Baker Act records, leaving me uninformed about a critical development that could impact my defense. On May 29, 2025, Mr. Burch emailed me, after I had requested to get a copy of the contract for Mr. Bowen as it was missing from my “entire investigative file”, stating “There was no written contract” (Exhibit 13- C, 13- D). Dr. Bowen agreed to provide his analysis for that amount. I believe he is still willing to do so”. Mr. Burch failed to secure Dr. Bowen as a witness with a written contract leaving me without a critical expert opinion to challenge the DOH’s baseless allegations of impairment. Relying on a verbal agreement

undermines the reliability of critical expert testimony needed to challenge the DOH's evaluation. This reckless approach reflects a severe lapse in diligence and competence, further prejudicing my case. Additionally, Mr. Burch may have misappropriated my \$1,000, as there's no evidence Dr. Bowen was ever retained.

Rule 4-1.3 (Diligence) and Rule 4-1.4 (Communication) – Failure to Ensure Traceable Delivery of Case Documents

To date, I have received no case documents with traceable proof of delivery that I signed for, despite my repeated concerns about hacking and interception, which could compromise the security of my mailbox. Instead, documents were simply dropped at my doorstep without any verification of receipt, possibly mailed to someone else, or emailed to hacked inboxes. Legally, without proof of delivery, I cannot be considered to have received these documents, and delivery to a potentially hacked mailbox should not be deemed sufficient. Mr. Burch failed to ensure that case-related documents were delivered through secure, traceable methods, such as certified mail with a return receipt, despite my explicit concerns about interference. This negligence further obstructed my ability to prepare my defense, violating his duty to act with reasonable diligence and to keep me informed about the status of my case materials.

Rule 4-1.1 (Competence) – Sabotaging My Case

Mr. Burch sabotaged my defense by altering deposition transcripts and barring critical evidence proving extensive hacking and retaliation over the past 2.5 years, documented in, but not limited to, >100,000 photos, ~4 laptops, 15 cellphones, USB sticks, 5 hard drives and ~10 detailed diaries. These actions prevented me from presenting a full defense against the DOH's baseless allegations, which have shifted from "delusional" to "impaired" without proper notice. His incompetence has left me vulnerable in a case that threatens my livelihood. Additionally, on December 10, 2024, during my deposition, I had to resubmit the "Set of Interrogatories" to Mr. Michael Morris of the Florida DOH because Mr. Burch withheld the notarized copies, I had provided him on November 19, 2024. Mr. Morris only had blank papers, forcing me to provide all the information verbally to him, further prejudicing my defense due to Mr. Burch's negligence.

Rule 4-8.4 (Misconduct) – Child Pornography Pingbacks on His Website

I discovered child pornography pingbacks on Mr. Burch's website under Smith & Associates, which I reported to the FBI and Florida Attorney General (Exhibit 3-A, 3-B, 3-C). This reflects a severe lapse in professionalism and cybersecurity, especially given my case involves extensive hacking over the past 2.5 years, documented in great detail. This misconduct endangered my case's security and reflects adversely on his fitness as a lawyer.

Rule 4-1.16 (Declining or Terminating Representation) – Unjust and Unwarranted Client Abandonment

On April 20, 2025, I informed Mr. Burch via email about a serious concern: his profile on www.smithlawtlh.com contained "pingbacks" of child pornography, which posed a significant risk to clients and was particularly alarming given my ongoing hacking concerns (Exhibit 3-D). Instead of addressing this issue professionally, Mr. Burch responded on April 23, 2025, by accusing me of claiming he was involved in child pornography, misrepresenting my concern as an accusation, and using this as a pretext to withdraw as my counsel (Exhibit 3-E). He further cited baseless reasons, including alleged payment issues and disagreements on legal strategy, despite my having paid the invoices and never

receiving clear communication on strategic disputes. This abrupt termination, after I did him a favor by alerting him to a potential security issue, constitutes an unjust and unwarranted abandonment of me as a client, leaving me without representation in a critical case. Mr. Burch's actions violated his duty to terminate representation only for good cause and in a manner that protects the client's interests, further prejudicing my defense in the Florida DOH case.

Rule 4-1.16(d) (Declining or Terminating Representation) – Withholding Additional Case Documents

After we parted ways on April 23, 2025, Mr. Burch sent me what he claimed was my "entire investigative file." However, numerous critical documents were missing, beyond the previously noted original complaint by Dr. Dahlin, the contract for Dr. Bowen, and the audio file for the deposition. On January 9, 2025, Mr. Burch was suddenly admitted to the hospital for an unknown issue, leading to a postponement of the court date, yet I was not provided with any court documents confirming the rescheduling, further obstructing my ability to prepare. The court date has been postponed 3 times now, yet I have not been provided with a single document of rescheduling. These additional missing documents have severely hindered my ability to prepare a defense in the ongoing Florida DOH case, as I lack access to essential materials that I am entitled to upon termination of representation. Mr. Burch's failure to provide a complete investigative file constitutes a serious violation of his duty to protect my interests during the transition, further exacerbating the prejudice to my case and obstructing my right to a fair defense.

Rule 4-1.6 (Confidentiality of Information) – Mishandling Sensitive Information

Mr. Burch mishandled sensitive information critical to my case. On April 17, 2025, he emailed me stating, "This case is not associated nor does it list any Social Security Number," which is alarming given that a second SSN was assigned to me and my colleagues at James A. Haley in 2016, a fact he should have investigated due to its relevance to my identity and case security (Exhibit 6).

Rule 4-1.4 (Communication) – Providing Inaccurate Information and Non-Functional Contact, Failure to Access Evidence, and Insistence on Insecure Zoom Meetings

Mr. Burch repeatedly provided me with a non-working office number, (850) 297-2006, via email, which I discovered was "not in service" when I attempted to contact him, a fact I have recorded on video (Exhibit 11- A, 11 B). Additionally, he initially gave me an incorrect personal email address, seurch79@gmail.com, to use for an invitation to my Dropbox account for file sharing, which I later corrected to sburch79@gmail.com, only to find out he never accepted the invitation, thus never accessing the critical evidence I collected, making it difficult, if not impossible, to coordinate my defense effectively (Exhibit 15-A, 15-B, 15-C, 15-D). Compounding this, in a "Notice of Hearing," with my name misspelled as "HEIDI MARJANNA LAHTENMAA," sent on November 20, 2024 (Exhibit 10). Mr. Burch insisted that the hearing would be conducted over Zoom, despite my repeated concerns about interceptions and ongoing hacking, which he had acknowledged via email on December 17, 2024. His insistence on Zoom meetings persisted throughout our communications, until his abandonment on April 23, 2025, exposing me to significant risks of cyberattacks. The FBI itself warned the public on March 31, 2020, of "Zoombombing," where hackers and trolls can infiltrate digital meetings (CyberScoop, 2020), a risk Mr. Burch recklessly disregarded despite my documented hacking concerns, further violating his duty to communicate effectively and protect my interests in a secure manner.

Rule 4-1.3 (Diligence) – Lack of Interest and Encouraging an Absurd Settlement

Mr. Burch demonstrated zero interest in defending my case. On December 17, 2024, he encouraged me to accept an absurd settlement offer from the Florida DOH, intimidating me by stating that the case was an “uphill battle” and the settlement “allows you to deny all allegations, agree to a revocation of your license, and not pay any costs or attorney’s fees” (Exhibit 5). This advice was given without him reviewing any of the evidence I had uploaded to Dropbox, as he never accepted the invitation to access it, showing a complete lack of diligence in understanding my case. He went on to state that this way I could “focus on fixing the hacking and taking care of yourself,” which is simply appalling.

Rule 4-1.1 (Competence) and Rule 4-1.4 (Communication) – Inconsistencies and Lack of Transparency

Mr. Burch’s handling of my case was riddled with inconsistencies and lack of transparency. On January 2, 2025, he advised me against sending anything to the state of Florida (DOH or AHCA), claiming we were in “active litigation against them” (Exhibit 4). I was never informed of any litigation against AHCA, nor have I received any paperwork to substantiate this claim, leaving me in the dark about critical aspects of my defense.

Rule 4-1.7 (Conflict of Interest) – Ignoring Safety Concerns and Whistleblower Protections

Mr. Burch ignored my repeated safety concerns about an open court proceeding against the largest telemedicine company in the world, Teladoc Health Inc., as well as likely mafia/organized crime involvement, which has led to my friends backing out due to fear—a reaction I cannot blame them for (Exhibit 9). He failed to address whistleblower protections, which I am entitled to under federal and state law, leaving me exposed to further retaliation. Additionally, in the December 18, 2024 “Settlement Offer” by the Florida DOH, which Mr. Burch encouraged me to accept, it states, “Respondent authorizes the Board to review and examine all investigative file materials,” despite Mr. Burch having previously requested a protective order against Teladoc on 11/25/24. This contradiction raises serious concerns regarding Mr. Burch’s intentions and/or ability to protect my safety. His lack of action on these concerns created a conflict of interest, and his failure to protect my safety undermined my trust in his representation.

Rule 4-1.3 (Diligence) – Inconsistent and Erroneous Documentation

Mr. Burch’s documentation was a chaotic mess, filled with incorrect dates, misspellings of my name on numerous occasions, and no socials (I have 2 SSNs as stated prior), further complicating my case. He also failed to address discrepancies with my Florida DOH medical license (OS16911), which has two issuance dates—one on January 3, 2024, with control number 96742, and another on February 17, 2024, with control number 100788—raising questions about its validity and his diligence in resolving this issue (Exhibit 1-A, 1-B, 1-C). Additionally, the AI suggests, “The bar number 11529 matches the profile of Stephen Burch in Melbourne, Florida, associated with Smith & Associates, as noted in professional directories.” However, per The Florida Bar’s member directory, the bar number 11529 belongs to “Courtney Davis Bowes, The Bowes Law Group, P.A.” The Florida Bar’s member directory lists Mr. Burch bar number as 90934 (Exhibit 2-A, 2-B, 2-C). This again illustrates the massive hurdles I am having to overcome daily due to cyberhacking and interceptions. I have attached a picture of Mr. Burch’s bar number from floridabar.org, face shot and his contact info, in an attempt to ensure accuracy.

Impact of Mr. Burch's Actions

Mr. Burch's misconduct has caused irreparable harm. His sabotage weakened my defense against the DOH, whose case lacks an initial complaint and has violated due process by now shifting accusations without notice. The revelation that there is no original complaint by Dr. Dahlin, combined with Mr. Burch's failure to obtain this information and subsequent alteration of the deposition transcript, has fundamentally undermined my ability to challenge the legitimacy of the DOH's case. Mr. Burch's case sabotage has caused me significant financial damage, and his failure to provide the Bowen contract has left me without a key expert to challenge the DOH's evaluation. The child pornography pingbacks are catastrophic to my case, and together with financial sabotage further isolate me in a 2.5-year retaliation campaign involving the FBI, organized crime, Teladoc Inc., and others. Mr. Burch's misconduct has caused significant harm, weakening my defense against the Florida DOH, whose case lacks the initial complaint, and has violated due process by shifting accusations without notice. Despite the severe negligence and lack of communication from Mr. Burch, the Florida DOH's baseless actions, and the ongoing torment of severe hacking, I remain more determined, willing, and able than ever to defend myself and act as my own lawyer. I am steadfast in my fight against this gross injustice, standing alone against massive entities like Teladoc, the mafia, and the FBI, showcasing my unwavering resilience and capability.

Requested Action

Given the egregious nature of Mr. Burch's misconduct, which includes, but is not limited to, sabotaging my defense, ignoring key aspects of my case such as the missing initial complaint by Dr. Dahlin, potentially misappropriating funds, withholding critical case documents, failing to provide information on the Probable Cause Panel (PCP) hearing and to provide expert witness testimony, insisting on insecure Zoom meetings despite known hacking risks, and unjustly abandoning me as a client after I raised legitimate concerns about child pornography linked to his website, along with his lack of diligence, mishandling of sensitive information, and overall incompetence, I request a thorough investigation into all aspects of his conduct. His actions have not only prejudiced my defense in the Florida DOH case, particularly through the child pornography pingbacks on his website, which pose a significant public safety risk, but have also endangered my safety and privacy due to his failure to ensure secure communication methods. I seek the maximum disciplinary penalties available under The Florida Bar's authority, including disbarment, to prevent further harm to other clients and to uphold the integrity of the legal profession. I request an expedited review due to the imminent harm of my DOH hearing on August 5 and 6, 2025, where Mr. Burch's sabotage has severely compromised my ability to defend my medical license. I am prepared to provide additional evidence, including, but not limited to, emails, payment records, and screenshots, upon request.

Thank you for addressing this urgent matter. I can be reached at the above email or phone number, though I request communication through secure channels due to ongoing hacking concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Heidi Lahteenmaa', followed by a long horizontal line extending to the right.

Dr. Heidi Lahteenmaa, DO