

**STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS**

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

vs.

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

HEIDI MARJAANA LAHTENMAA, D.O.,
Respondent.

MOTION TO DISMISS WITH PREJUDICE

COMES NOW, Heidi Marjaana Lahtenmaa, D.O., appearing pro se, pursuant to Florida Statutes § 120.57(1)(e) and Florida Administrative Code Rule 28-106.201, and respectfully moves this Honorable Division of Administrative Hearings (DOAH) to dismiss all proceedings in the above-captioned case based on newly discovered information. This motion is based on the illegal issuance of my osteopathic physician license (OS16911) by the Florida Department of Health (FL DOH) on January 3, 2024, and February 17, 2024, which invalidates their authority to pursue this lawsuit.

The FL DOH issued my license (OS16911) on January 3, 2024, without the mandatory attestation questions required by Florida Administrative Code Rule 64B15-6.003, a process designed to ensure compliance with Florida Statutes § 459.008. Public records on internet.doh.state.fl.us confirm this bypass. This self-inflicted error—issuing an illegal license now used to prosecute me—defies logic. 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.

Florida Statutes § 120.57(1)(e) mandates dismissal for actions lacking legal or evidentiary support. Yet, the FL DOH persists in building a defamatory public lawsuit based on an illegal license, issued through a compromised system, while ignoring my questions. This retaliatory targeting and egregious misconduct by the FL DOH, follows my January 2023 Teladoc whistleblower disclosure (§ 112.3187, Fla. Stat.).

GROUND FOR DISMISSAL

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” (Exhibits 2-A, 2-B, 2-C, 2-D).

A second issuance occurred on February 17, 2024, following an address change per FL DOH (Exhibit 3-D, 5-A, 5-B). 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 (Exhibits 1-A, 1-B). 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,” yet she offered no explanation why the first one was not deleted, suggesting it is normal practice for every license update to generate a new one (Exhibit 3-D). 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. 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.

2. Consequences of a Dysfunctional System:

A government website exhibiting such extensive malfunctions, issuing illegal licenses without oversight, erodes public trust and poses grave risks—fraudulent practice, identity theft, and patient safety hazards—while violating the DOH’s duty under Fla. Stat. § 20.43 to protect Floridians. If the DOH cannot ensure accurate license issuance, how can they rely on any data within their systems, including the accuracy of information on my account, or compel me to appear in court on a compromised digital infrastructure they cannot manage? This systemic failure invalidates their ability to prosecute me based on a technological quagmire they are unable to resolve.

3. 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 (Exhibits 6-A, 6-B, 6-C, 6-D, 6-E, 6-F, 6-G, 6-H). 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.

4. Potential Ransomhub Hacking and Negation of Defamatory Charges:

The illegal issuances may stem from Ransomhub hacking the DOH system, thereby validating my cyberattack reports and negating the DOH's publicly defamatory charges of "delusions," "severe psychosis," and "impairment" without a § 90.603 evaluation. According to Ellen, the FL DOH is responsible for this, seemingly normalizing the issuance of illegal licenses without showing the slightest concern (Exhibit 3-D, 6-C), yet she fails to identify the culprit responsible. The DOH's refusal to investigate the possibility of a cyberattack, despite my inquiries, further supports dismissal.

5. 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") (Exhibits 3-D, 4-A, 4-B, 4-C, 4-D, 4-E), 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 (Exhibits 2-A, 2-B, 2-C, 2-D). 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.

Furthermore, 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.

The omission of the attestation questions 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 or incomplete records that starkly contradict the public records, an act that may violate Florida Statutes § 817.49 (false information by a public officer), possibly escalating this to criminal misconduct. Such misrepresentation or error invalidates the DOH's case and reinforces the illegal issuance.

This is a procedural nightmare that undermines the DOH's credibility, especially when they label my hacking concerns as "delusions" while ignoring Ransomhub's later 100 GB breach claim (August 30, 2024). It reeks of a potential cover-up, an ongoing investigation, entrapment, or retaliation for my Teladoc whistleblowing and an ongoing government-sealed investigation.

6. 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 (Exhibits 3-A, 6-A, 6-B, 6-D, 6-F), the DOH has refused to respond, dismissing my inquiries as irrelevant or vague (Exhibits 6-C, 6-E, 6-G). 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

LEGAL ARGUMENT

The Florida Department of Health (FL DOH) unlawfully issued my osteopathic physician license (OS16911) without proper attestation, in violation of Florida Statutes § 459.008 and Florida Administrative Code Rule 64B15-6.003, thereby nullifying the legal foundation of its case. This violation was compounded by the license’s reissuance on February 17, 2024, due to a significant system error specific to my account, resulting in duplicate licenses. The FL DOH failed to delete the prior license, and Ellen LeGendre Carlos provided an inadequate explanation for this error, undermining the integrity of the regulatory process. Furthermore, 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. The FL DOH provided me with a license record omitting the attestation section, which conflicts with publicly available documents that include such questions, raising serious doubts about the integrity of the FL DOH’s records. 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.

RELIEF SOUGHT

WHEREFORE, I respectfully request that this Court:

1. Dismiss all proceedings in Case Nos. 2023-54547 and 24-004162PL.
2. Order the DOH to investigate the illegal license issuances on January 3, 2024, and February 17, 2024, including a forensic analysis of their system for Ransomhub hacking, glitches, or record fabrication.
3. Grant such other relief as deemed just.

Respectfully submitted,



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



Date: July 25, 2025

CERTIFICATE OF SERVICE:

I certify that a copy of this motion was filed electronically with DOAH via the eALJ portal on July 25, 2025, and furnished to Michael Morris, DOH counsel, at Michael.Morris@flhealth.gov and the Public Records Coordinator at PublicRecordsRequest@flhealth.gov on July 25, 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:

The following exhibits are submitted in support of Motion to Dismiss in the above-captioned case:

1. Exhibits 1-A, 1-B; duplicate license (OS16911), with a different issue dates and control numbers
2. Exhibits 2-A, 2-B, 2-C, 2-D; Screenshots from mqa-internet.doh.state.fl.us showing the issuance of license (OS16911), with expiration date on March 31, 2026, with bypassed attestation questions.
3. Exhibits 3-A, 3-B, 3-C, 3-D; Emails with detailed questions to Ellen LeGendre Carlos and Michael Morris regarding license duplication
4. Exhibits 4-A, 4-B, 4-C, 4-D, 4-E; Copy of the renewal application dated January 2, 2024, provided by Ellen LeGendre Carlos, asserting attestation (marked "Yes").
5. Exhibits 5-A, 5-B; Address change submitted on February 16, 2024.
6. Exhibits 6-A, 6-B, 6-C, 6-D, 6-E, 6-F, 6-G, 6-H regarding license duplication and lack of response