

**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 COMPEL DISCOVERY

I, Heidi Marjaana Lahtenmaa, D.O., proceeding pro se as Respondent in this matter, hereby submit this Motion to Compel Discovery under Florida Statutes § 120.569 and Florida Administrative Code Rule 28-106.206, seeking an order from the Division of Administrative Hearings (DOAH) to mandate that the Florida Department of Health, Petitioner, disclose documents and information withheld during discovery. This motion is grounded in the facts, arguments, and evidence presented herein, and is filed to guarantee a just proceeding prior to the scheduled trial on August 5–6, 2025.

FACTS

1. I am a licensed osteopathic physician, DO (License No. OS 16911), Respondent in administrative complaints in Case Nos. 2023-54547 and 24-004162PL, alleging professional misconduct.
2. Petitioner has failed to fully respond to my discovery requests, including public records requests (Reference Nos: P137244-070325, L137263-070425) dated July 3, 2025, seeking a detailed written log of all withheld or redacted documents, citing the specific statutory exemption(s) for each, as required by § 119.07(1)(d), Florida Statutes, as well any non-exempt portions of withheld documents.
3. On July 15, 2025, Michael Morris, Esq., denied receiving notarized interrogatories I served on November 19, 2024, withheld by my former counsel, Stephen Burch (Exhibit A).

The deposition on December 10, 2024, was entirely devoted to refilling these withheld interrogatories, during which Morris produced a second set. This set was unnotarized, rendering it unverified under Florida Administrative Code Rule 28-106.206. Additionally, the deposition transcript, page 67, falsely states, “I, the undersigned authority, certify that HEIDI MARJAANA LAHTENMAA, D.O. remotely appeared before me,” signed by CRAIG W. TAYLOR, STENOGRAPHER, despite my physical presence with Morris, Burch, and Taylor (Exhibit B). This unnotarized status and falsified transcript further evidence Petitioner’s failure to comply with discovery obligations. All of Petitioner’s productions of the “complete investigative file” have omitted the notarized set, despite its legal significance.

4. Significant irregularities exist, including, but not limited to:

- Medicare/Medicaid Fraud: I discovered that Teladoc billed over \$4,000, in some cases, for 15-45 minute visits with Medicaid patients under my name and business (Exhibits D-1, D-2, D-3, D-4), despite emails from Teladoc confirming I lack a Florida Medicaid license and requesting I obtain one, which I did not (Exhibit C).

This extensive fraudulent billing, conducted without my consent or licensure, supports this Motion to Compel Discovery to expose the complete extent of this substantial fraud within the operations of a leading telemedicine company. My uncovering of this fraud has provoked targeted cyberattacks and significant retaliation, including, but not limited to, Petitioner wrongly defaming me publicly as delusional, regarding the cyberattacks, and claiming I am unfit to perform my physician responsibilities, such as prescribing medications, due to impairment, though any such problems originate solely from Teladoc system failures (Exhibits K).

- Licensure Discrepancies: The American Board of Psychiatry and Neurology (ABPN) misclassified me as an MD since my 2016 psychiatry board exam, issuing a certificate with this error despite my DO status (Exhibits E-1, E-2).

- Additionally, I hold two active Florida licenses, with issuance dates of January 3, 2024 (control number 96742) and February 17, 2024 (control number 100788), raising questions about their validity (Exhibits F-1, F-2). To date, the Florida Board of Osteopathic Medicine (MQA.Osteopath@flhealth.gov) has failed to address these discrepancies (Exhibits G-1, G-2). I was also listed as an orthopedic surgeon online around 2023.

- Identity Theft Concerns: A second active Social Security Number (SSN) was issued to me and my colleagues in 2016 at James A. Haley VA Tampa, Florida, months before me being misclassified as MD on ABNP website, suggesting potential identity theft or fraud. (Available if a secure link is provided).

- Federal Involvement: The FBI’s 2024 FOIPA denial ((Exhibit I), despite successfully submitted IC3 and other complaints to various agencies (Exhibits H), and 2024 statement

from Governor DeSantis's office ("orders are coming from DC") indicate possible federal orchestration of this case.

5. On August 12 2024, I was admitted to Delray Medical Center under a Baker Act, based on false accusations of "psychosis." A medical bill from Delray Medical Center (Exhibit L) shows total charges of \$44,288.75 for room, nursing care, pharmacy, laboratory, and imaging services. Despite listing "None on File" for primary and secondary insurance, the bill reflects an insurance adjustment of \$40,844.75, suggesting possible government (.gov) involvement, which I did not consent to, and payment. This discrepancy raises further concerns about the validity of my admission and the source of funding, potentially linked to federal or state orchestration of this case.

Despite receiving some Baker Act records related to my admission at Delray Medical Center from August 12–16, 2024, I have found them to be incomplete and inaccurate, lacking critical information such as the billing data (Exhibit L), staff notes, and the required BA-32 form, which was never completed despite my five-day detention, further evidencing Petitioner's failure to provide a full and accurate discovery response and suggesting retaliatory acts.

6. On November 25, 2024, my former counsel, Stephen Burch, filed a Motion for Protective Order (Exhibit M) in Case No. 24-004162PL, seeking to prevent the Department of Health (DOH) from serving a Deposition Subpoena Duces Tecum on my former employer, Teladoc Health, Inc., for employment, personnel, payment, and correspondence records from January 1, 2020, to present. The motion cites an Administrative Complaint alleging I am unable to practice osteopathic medicine due to an "unspecified diagnosis not due to a known substance or psychological condition" per Florida Statute § 459.015(1)(w), but the basis for this protective order remains unclear to me, especially given the lack of relevance to my mental health status and the potential retaliatory nature of the underlying actions, further evidencing Petitioner's failure to provide a full and accurate discovery response and suggesting retaliatory acts.

7. Amidst ongoing cyberattacks targeting me, I discovered photos of a Teladoc slideshow presentation (Exhibit N) that unexpectedly appeared on my computer screen. This presentation instructs personnel on how to "not inform viewers of recording" regarding provider access software camera or patient access device camera, providing evidence that Teladoc has the capability to hack into personal devices without the user's knowledge or consent. This raises serious concerns about Teladoc's involvement in the cyberattacks I have experienced and further supports my claims of retaliatory acts, further evidencing Petitioner's failure to provide a full and accurate discovery response and suggesting retaliatory acts by third parties and/or Petitioner.

8. These irregularities contribute to life-threatening harm to me, including, but not limited to, canceled health insurance by hackers; I desperately needed to get breast lump biopsy (Exhibits J). Even with cash payment, the biopsy was canceled, presumably by hackers. The complete career and income destruction and severe ongoing whistleblower retaliation

of undetermined duration, by the Florida DOH and others, prevent me currently from pursuing treatment for the breast lump. Additionally, severe stress from public defamation/slander by Dr. Dahlin and Fl DOH necessitates urgent resolution.

ARGUMENT

1. Right to Discovery: Under Florida Statutes § 120.569(2)(e) and Florida Administrative Code Rule 28-106.206, I am entitled to discovery of all non-exempt, relevant documents to prepare my defense as well as detailed written log of all withheld or redacted documents, citing the specific statutory exemption(s) for each, as required by § 119.07(1)(d), Florida Statutes. Petitioner's incomplete responses and failure to address the above irregularities, violate this right.

2. Materiality of Requested Documents: The withheld records are material to my defense, as they may reveal the extent of Medicare/Medicaid fraud, identity theft, and/or federal retaliation underpinning this case. Numerous examples of fraudulent billing under my name for Florida Medicaid patients, without a Florida Medicaid license, licensure errors, and SSN and license duplication suggest the case relies on invalid data, potentially violating § 119.07(1)(e), F.S., and § 112.3187, F.S. (whistleblower protection).

3. The medical bill from Delray Medical Center (Exhibit L) is material to my defense, as it may reveal unauthorized government or third-party funding of my Baker Act admission. The \$40,844.75 adjustment despite no listed insurance suggests possible .gov involvement, supporting my claims of federal involvement/retaliation and/or falsified accusations of "psychosis." This evidence is relevant under § 119.07(1)(e), F.S., and § 112.3187, F.S. (whistleblower protection), and must be disclosed to ensure a fair proceeding.

4. The Motion for Protective Order filed by my former counsel on November 25, 2024 (Exhibit M) raises additional concerns about the scope and intent of Petitioner's discovery efforts. The protective order seeks to block access to Teladoc records that may contain evidence of Medicare/Medicaid fraud, licensure discrepancies, or retaliatory actions against me, yet its vague basis—tied to an "unspecified diagnosis"—suggests an attempt to shield relevant information. This further supports my right to compel production of all related documents under Florida Statutes § 120.569(2)(e) and Florida Administrative Code Rule 28-106.206, as the withheld records are material to my defense and may reveal improper conduct by Petitioner or third parties.

5. The photos of the Teladoc slideshow presentation (Exhibit N) are highly material to my defense, as they demonstrate Teladoc's ability to secretly record or access personal devices, potentially implicating them in the cyberattacks I have suffered. This evidence supports my allegations of Medicare/Medicaid fraud and system malfunctions (Exhibits D-1 to D-4, K) and suggests a coordinated effort to undermine my practice, possibly with Petitioner's knowledge or involvement. I am entitled to compel production of all related records under

Florida Statutes § 120.569(2)(e) and Florida Administrative Code Rule 28-106.206 to investigate the source and intent of these cyberattacks.

6. The production of unnotarized interrogatories, combined with the omission of the November 19, 2024 notarized set, and the falsified transcript, constitutes a violation of Florida Administrative Code Rule 28-106.206, which requires verification of discovery responses. This pattern of unverified documentation and falsification demonstrates bad faith by Petitioner, necessitating compelled production under Florida Statutes § 120.569 to ensure a fair and accurate proceeding ahead of the August 5–6, 2025 trial.

7. The trial scheduled for August 5–6, 2025, cannot proceed fairly without the production of the requested documents, which are vital to my defense. Given the extensive scope of the materials sought—including billing records, licensing data, federal communications, Baker Act records, protective order details, and evidence of cyberattacks—it is impossible for Petitioner to produce them, or for me, as a pro se respondent, to review and prepare without sufficient time. Postponement is necessary to ensure due process and a fair trial, as the absence of this material would irreparably prejudice my ability to defend against the allegations.

RELIEF SOUGHT

WHEREFORE, I, Respondent, respectfully request that the Division of Administrative Hearings:

1. Postpone the trial scheduled for August 5–6, 2025, until the following documents and information are produced, as they are vital to my case and essential for a fair proceeding:

- All Teladoc billing records (e.g., Availity data) under my name, including fraudulent Medicare/Medicaid charges exceeding \$4,000 for 15–45-minute visits, and correspondence with DOH or federal agencies.
- All ABPN communications and DOH licensing records regarding my certification status (MD vs. DO) since 2012.
- Records of my two active Florida licenses for OS 16911, including issuance dates (January 3, 2024, and February 17, 2024) and SSN links.
- Any web data or DOH records listing me as an orthopedic surgeon, with sources and correction attempts.
- All Social Security Administration (SSA) records of the 2016 second SSN issuance.
- All DOH communications with the FBI, DOJ, or other federal entities regarding my case, including any directives (e.g., DeSantis’s “orders from DC”).

- All PCP records (minutes, findings, transcripts) from the August 26, 2024 meeting and related discovery materials.
 - All records related to my Baker Act admission at Delray Medical Center from August 12–16, 2024, including payment sources for the \$40,844.75 insurance adjustment, correspondence with government agencies (.gov), and documentation justifying the admission based on accusations of "psychosis" (Exhibit L).
 - All records of the November 19, 2024 notarized interrogatories withheld by Stephen Burch, the unnotarized interrogatories produced on December 10, 2024, the corrected December 10, 2024 deposition transcript, all unsigned deposition materials, Craig Taylor's certification records, and all communications regarding the unnotarized and notarized interrogatories, transcript alterations, or signature omissions.
 - All records related to the Motion for Protective Order filed by Stephen Burch on November 25, 2024 (Exhibit M), including the basis for its filing, all correspondence between DOH and my former counsel regarding the subpoena to Teladoc Health, Inc., and any documents or evidence considered in determining the relevance of the requested Teladoc records to the Administrative Complaint in Case No. 24-004162PL.
 - All records related to the Teladoc slideshow presentation depicted in Exhibit N, including its origin, distribution, training protocols for operators, and any correspondence or documentation regarding the use of provider access software cameras or patient access device cameras to record or access personal devices without consent, as well as any investigations or complaints about unauthorized access by Teladoc.
2. Require Petitioner to provide a detailed exemption log for any withheld documents, pursuant to § 119.07(1)(e), F.S., prior to the postponed trial date.
 3. Grant me sufficient time after production to review the documents without legal representation, as I am proceeding pro se, as all attempts to get counsel have been intercepted, to ensure I can adequately prepare my defense and receive a fair trial, given the extensive volume of material and the complexity of the issues involved.
 4. Schedule a hearing to address this motion and the underlying irregularities, including, but not limited to, Medicare/Medicaid fraud, licensure discrepancies, identity theft, cyberattacks, and retaliatory acts, to determine an appropriate postponed trial date that allows for full disclosure and preparation.
 5. Grant such other relief as deemed just and proper.

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.

EXHIBITS

1. Michael Morris's email dated July 15, 2025, as "Exhibit A".
2. Deposition Transcript page 67 (Exhibit B).
3. Teladoc emails confirming I lack a Florida Medicaid license and requesting one (Exhibit C).
4. Screenshots of Medicare/Medicaid billing (Availity records) showing over \$4,000 in fraudulent charges (Exhibits D-1, D-2, D-3, D-4).
5. ABPN 2016 certificate listing me as MD and the current status on their website as of today July 15, 2025 (Exhibits E-1, E-2).
6. DOH license records showing my two active licenses (Exhibits F-1, F-2).
7. Emails to the Florida Board of Osteopathic Medicine (MQA.Osteopath@flhealth.gov) (Exhibits G-1, G-2).
8. Some of the successfully submitted IC3 and other complaints (Exhibits H).
9. The FBI's 2024 FOIPA denial (Exhibit I).
10. Medical Exhibits (Exhibits J).
11. Teladoc system malfunctions (Exhibits K).
11. The medical bill from Delray Medical Center (Exhibit L).
12. Motion for Protective Order (Exhibit M).
13. Teladoc Video Presentation Screenshots (Exhibit N).