

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.

_____ /

NOTICE OF NO WITNESSES

COMES NOW, Dr. Heidi Lahteenmaa, DO, Respondent in the above-styled cause, and files this Notice of No Witnesses pursuant to the Amended Order of Pre-Hearing Instructions dated May 14, 2025, and states as follows:

1. Compliance with Deadline: This notice is filed with the Division of Administrative Hearings (DOAH) via the e-ALJ portal on July 29, 2025, meeting the 7-day pre-hearing exchange requirement with the Petitioner, Florida Department of Health, and the 5-day filing deadline of July 31, 2025, for the final hearing scheduled on August 5-6, 2025.
2. No Witnesses Intended: Respondent does not intend to call any witnesses at the hearing due to credible concerns of witness intimidation, potentially involving mafia, Teladoc, and cybergang elements tied to a sealed Teladoc investigation. Teladoc Health, Inc., a telemedicine giant with a market capitalization exceeding \$3 billion and serving millions of patients annually, exerts significant influence, amplifying risks in a public court setting.
3. Inadequate Protections: The absence of adequate security measures renders witness testimony unfeasible, as the risks to their safety outweigh any benefits. Subpoenaing individuals under these conditions would be unethical, given documented threats and surveillance affecting Respondent.
4. Lack of Clarification: Michael Morris, Petitioner's representative, has refused to address Respondent's requests for clarification regarding the specific matters they would testify about. This lack of transparency, combined with the improper service of the Subpoena Ad

Testificandum via email (lacking a certified copy or affidavit), among other issues as covered in Motions, justify the decision to forgo witnesses at this stage.

WHEREFORE, Respondent requests that DOAH accept this notice, and serve it on the Petitioner. Respondent requests confirmation of the filing via the e-ALJ system.

Respectfully submitted,



Dr. HEIDI MARJAANA LAHTENMAA, D.O.

Pro Se

Nane Los Inc.



Date: July 29, 2025

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Notice of No Witnesses has been furnished to the Petitioner, Florida Department of Health, via email to Michael Morris at Michael.Morris@flhealth.gov. I certify that a copy of this motion was filed electronically with DOAH via the eALJ portal on July 29, 2025.