

STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS

DEPARTMENT OF HEALTH,

PETITIONER,

v.

DOAH CASE No. 24-4162PL
DOH CASE No. 2023-54547

HEIDI MARJAANA LAHTENMAA, D.O.,

RESPONDENT.

_____ /

PETITIONER'S PROPOSED RECOMMENDED ORDER

On August 5, 2025, a final hearing in this case was conducted before Administrative Law Judge Robert S. Cohen via Zoom video conference.

APPEARANCES:

For Petitioner: Michael Morris, Esquire
4052 Bald Cypress Way, C-65
Tallahassee, Florida 32399

For Respondent: Heidi Marjaana Lahtenmaa, D.O.
311 Golf Road, Ste. 1000 #1007
West Palm Beach, Florida 33407

STATEMENT OF THE ISSUES

Whether Respondent is unable to practice osteopathic medicine with reasonable skill and safety to patients by reason of illness or use of alcohol, drugs, narcotics, or chemicals or any other type of material or as a result of any mental or physical condition in violation of section 459.015(1)(w), Florida Statutes (2023), and if so, what discipline should be imposed.

PRELIMINARY STATEMENT

On August 26, 2024, Petitioner, Department of Health, Board of Osteopathic Medicine (Department), filed a one-count Administrative Complaint against Respondent, Heidi Marjaana Lahtenmaa, D.O., alleging that Respondent violated section 459.015(1)(w) by being unable to practice osteopathic medicine with reasonable skill and safety to patients due to Respondent's unspecified psychosis.

On November 7, 2024, the Department referred this matter to the Division of Administrative Hearings (DOAH) pursuant to Respondent's request for an administrative hearing involving disputed material facts. The final hearing occurred on August 5, 2025, via Zoom video conference.

At the final hearing, Petitioner's Exhibits 1–6 and 10 and Respondent's Exhibits 1–6 were admitted into evidence. Petitioner offered the testimony of Robert Dahlin, D.O., Niaah Ellis, [REDACTED] M.D., and Theodore R. Treese, M.D. Respondent did not present any witnesses and testified on her own behalf.

The two-volume final hearing transcript was filed on September 10, 2025. To the extent that the parties timely filed Proposed Recommended Orders, they have been considered.

References to the record are by "Tr. V." referring to the transcript with corresponding volume number; "P. Ex." referring to Petitioner's Exhibits; and "R. Ex." referring to Respondent's Exhibits. Unless otherwise indicated, citations to the Florida Statutes or rules of the Florida Administrative Code refer to the version in effect at the time that the violation was committed.

FINDINGS OF FACT

1. The Department is the state agency charged with regulating the practice of osteopathic medicine in the State of Florida, pursuant to section 20.43, Florida Statutes, and chapters 456 and 459, Florida Statutes.

2. At all times material to this proceeding, Respondent was licensed to practice as an osteopathic physician within the state of Florida, having been issued license number OS 16911. P. Ex. 8, p. 6.

3. At all times material to this proceeding, Respondent's address of record with the Department was 3540 S. Ocean Blvd., Ste. 805, Palm Beach, Florida 33480.¹

4. On or about November 20, 2023, Robert Dahlin, D.O., (Dr. Dahlin) reported Respondent to the Professionals Resource Network (PRN), an impaired practitioner program, based on concerns that Respondent was experiencing a mental health crisis. P. Ex. 3, p. 257.

5. Dr. Dahlin is a licensed physician in the State of Minnesota and currently practices in the field of neurosurgery. P. Ex. 6.

6. Dr. Dahlin and Respondent initially met while in medical school in or around 2009, where they became very good friends. Respondent was Dr. Dahlin's "best man" at his wedding and was present for the birth of Dr. Dahlin's first child. Tr. V.1, p. 19; P. Ex. 3, p. 269.

7. Approximately two years ago, Dr. Dahlin became concerned about Respondent's mental health because Respondent began exhibiting signs of delusions and paranoia. Tr. V.1, pp. 20-21; P. Ex. 3, p. 269.

8. Respondent believed that people were out to get her, that someone planted cameras in her house, that her electronics had been hacked, that people were following and spying on her, and that her telemedicine patients were actors working with Teledoc Health (Teledoc). Additionally,

¹ Respondent is currently residing in Finland.

Respondent had all of her food delivered because she believed that she could not safely leave her apartment. Tr. V.1, pp. 20-21; P. Ex. 3, pp. 268-69.

9. At the core of Respondent's claims, was her belief that that she was a whistleblower against her former employer, Teledoc Health (Teledoc). Respondent believed that everything she was experiencing was a result of retaliation from Teledoc. Tr. V.1, pp. 40-44, 52, 62, 119-20, 123-24; Tr. V.2, pp. 185-86, 197-98, 208-31; P. Ex. 8, pp. 16, 22-25, 56, 65; P. Ex. 10.

10. In November 2023, Dr. Dahlin visited Respondent to check on her. At that time, Respondent continued exhibiting delusional and paranoid behavior such as hearing noises outside or on the roof and attributing the noise to someone spying on her and believing that strangers were listening to her or following her while in public. P. Ex. 3, p. 269; Tr. V.1, pp. 31, 38-40.

11. Dr. Dahlin asked Respondent if she had any legitimate evidence to support her claims, which Respondent was unable to provide. Tr. V.1, pp. 70-71.

12. Respondent's behavior was dramatically different from how she had usually behaved over the course of her and Dr. Dahlin's 14- to 15-year friendship. Dr. Dahlin talked to Respondent about getting psychological care, but Respondent refused the assistance. Tr. V.1, p. 21.

13. Respondent's unusual and concerning behavior prompted Dr. Dahlin to report Respondent to PRN. P. Ex. 3, p. 269' Tr. V.1, p. 31.

14. PRN attempted to contact Respondent but was unsuccessful, resulting in PRN closing Respondent's file on or about December 21, 2023. PRN subsequently referred the matter to the Department for investigation into Respondent's ability to safely practice osteopathic medicine. P. Ex. 3, pp. 257, 265, 268.

15. In response to the Department's investigation, Respondent sent several emails to Department employees which were incoherent, paranoid, and/or delusional in nature. P. Ex. 3.

16. Respondent reported that her email account was compromised due to the ongoing “hacking situation/cyberwar,” and that the website for the Florida Board of Osteopathic Medicine (Board) diverted to identical sites that were actually “hacker sites.” P. Ex. 3, p. 237.

17. Respondent also directed the Department to contact the Federal Bureau of Investigations (FBI) to confirm the alleged existence of an active investigation into the Teledoc hackers that were harassing Respondent. P. Ex. 3, pp. 237, 244.

18. Based upon the information obtained during the Department’s investigation including the PRN records and Respondent’s behavior, the Department issued an Order Compelling Examination to determine whether Respondent was able to safely practice as an osteopathic physician. Tr. V.1, pp. 90-91.

19. On April 16, 2024, Respondent underwent the Department-ordered evaluation with Theodore R. Treese, M.D., (Dr. Treese). Dr. Treese is Board-certified in psychiatry, neurology and addiction medicine. Tr. V.2, pp. 139, 142.

20. During the evaluation, Respondent reiterated her claims that she was being surveilled, not only by Teledoc but also by larger groups outside of Teledoc such as government agencies, due to her reported whistleblowing. Dr. Treese attempted to verify Respondent’s claims of persecution, but Respondent did not provide any evidence to support or corroborate her contentions. Tr. V.2, pp. 146, 186, 188-89; P. Ex. 1, pp. 3-4.

21. In speaking with Dr. Treese, Respondent exhibited delusional thinking, disorganized speech, significant emotional distress, social or professional withdrawal, neglect of personal needs, and professional and personal dysfunction. Tr. V.2, p. 149; P. Ex. 1, p. 9.

22. Dr. Treese diagnosed Respondent with unspecified psychosis not due to a known substance or psychological condition and indicated the need to

rule out the possibility of stimulant-induced psychotic disorder. Tr. V.1, p. 163; P. Ex. 1.

23. Psychosis refers to a loss of contact with reality. People having a psychotic episode are not able to think clearly, and they may have delusions or hallucinations. P. Ex. 4, p. 95.

24. Dr. Treese was unable to determine the root cause, or etiology, of Respondent's psychosis. Tr. V.2, pp. 163-64.

25. Respondent's psychosis could be the result of a primary psychiatric disorder, it could be substance-induced, or it could be a symptom of another medical condition that has yet to be identified. Tr. V.2, pp. 163-64; P. Ex. 1, p. 9.

26. A substance-induced psychosis could be the result of substance abuse or an adverse reaction to prescription drugs. Between approximately June 2021 and May 2024, Respondent was prescribed one 20 mg-tablet of Adderall three times per day, which is considered a relatively high dose. Adderall is an amphetamine stimulant drug used to treat attention deficit /hyperactivity disorder. Amphetamine use or abuse can cause or contribute to delusional or psychotic thinking, especially if combined with other substances. Tr. V.1, pp. 115-116, 127; Tr. V.2, pp. 152-53, 158, 163-64; P. Ex. 5, p. 10.

27. Respondent failed to comply with the required toxicology testing in conjunction with her evaluation by Dr. Treese; therefore, Dr. Treese was unable to assess the potentiality of substance use being a cause or contributing factor of Respondent's psychosis. Tr. V.2, p. 148.

28. It is also possible that Respondent's psychosis was caused by metastasized cancer of the brain. This theory is based upon Respondent's report of a breast mass that has not yet been thoroughly evaluated. Tr. V.2, pp. 149-50, 164.

29. Regardless of the etiology, Respondent's psychosis has severely limited her insight and judgment, and her ability to perform complex

reasoning. Judgment and complex reasoning are necessary skills for the safe practice of osteopathic medicine. Tr. V.1, p. 51; P. Ex. 1, p. 7.

30. Therefore, Respondent's psychosis rendered her unable to practice as an osteopathic physician with reasonable skill and safety to patients. Tr. V.2, pp. 161-62, 165; P. Ex. 1, p. 10.

31. Dr. Treese recommended that Respondent undergo a residential multi-day assessment and treatment and engage in monitoring by PRN. Tr. V.2, p. 165.

32. Respondent has not undergone the recommended evaluation, has not engaged in any treatment, and is not under monitoring. P. Ex. 8, p. 51.

33. Based upon the events since her diagnosis, Respondent's psychosis has remained, and she continues to be unable to safely practice osteopathic medicine. Tr. V.2, p. 163.

34. In August 2024, Respondent's colleagues noticed Respondent's worsening delusions, including Respondent's belief that her patients were FBI agents. Ex. 4, p. 68.

35. Respondent's colleagues contacted emergency services, which resulted in Respondent's involuntary admission to Delray Medical Center (Delray) pursuant to the Baker Act² on August 12, 2024. P. Ex. 8, p. 16; P. Ex. 4, p. 68; Tr. V.2, p. 151.

36. At the time of her admission, Respondent reported that Teledoc had hacked her phone and laptop, hacked her friend's phone, hired people to break into her home, and took control of Uber³ which resulted in her being picked up by the "mafia." Respondent further asserted that her health insurance and a plane ticket that she purchased were cancelled by Teledoc or

² Chapter 394, Florida Statutes, also referred to as the Baker Act, allows for the involuntary commitment and examination of an individual if there is evidence that the individual possibly has a mental illness and is in danger of becoming a harm to themselves or others, or is self-neglectful.

³ Uber is a ride-share company.

entities working with Teledoc. Respondent claimed that she went into T-Mobile and reported that her phone had been hacked; an employee assisted her with getting a new phone; Respondent believed that the employee was a party of the Teledoc conspiracy against her. P. Ex. 4, pp. 68-69, 120, 228.

37. During intake, Respondent reported that she was taking Adderall and Trazadone, an antidepressant medication that is sometimes used off-label to treat insomnia. P. Ex. 4, p. 228.

38. The attending physician noted that Respondent may have been suffering from a stimulant induced psychosis with delusions, and that the addition of Trazadone may be causing sleep disturbances, exacerbating the psychosis. The physician ordered that Respondent's Adderall be discontinued. The physician also ordered that Respondent begin taking Paliperidone, an antipsychotic medication, which was administered to Respondent while in the hospital. P. Ex. 4, p. 83.

39. On August 16, 2024, a Delray physician re-evaluated Respondent and found that she was no longer spontaneously offering overt delusions regarding cyberattacks or stalking.⁴ Because Respondent did not appear to be an imminent danger to herself or others, Respondent was discharged pursuant to the limitations of her admission under the Baker Act. P. Ex. 4, p. 84.

40. Respondent's discharge diagnosis was delusional disorder, persecutory type and substance-induced psychotic disorder with delusions. P. Ex. 4, p. 83.

41. Although Respondent's symptoms of psychosis appeared to have temporarily improved while in the hospital, they have not resolved.

42. In December 2024, Petitioner took Respondent's deposition in this matter. During the deposition, Respondent claimed that she was still being cyberattacked by Teledoc, and that the hackers were preventing her from

⁴ It isn't clear whether her symptoms improved due to administration of an antipsychotic medication or the cessation of Adderall. Tr. V.2, pp. 153-54.

getting medical care by cancelling her appointments or intercepting her calls. P. Ex. 8, pp. 15-16.

43. In March 2025, Respondent sent Dr. Dahlin numerous texts messages in which Respondent continued to assert that she was being targeted and hacked by cyber criminals, that the “Miami mafia” was torturing her, and that the FBI engaged in a prolonged campaign to psychologically torture her. Again, Respondent attributed these acts to a conspiracy of retaliation for being a whistleblower against Teledoc. Tr. V.1, p. 26; P. Ex. 10, pp. 2, 6, 11.

44. Respondent’s text messages were consistent with continued delusional rants. Tr. V.1, pp. 70-71.

45. Months later, at the final hearing in this matter, the ongoing nature of Respondent’s psychosis was evident. Tr. V.2, pp. 207-34.

46. In addition to reasserting her previous claims about hacking, Respondent testified that she was essentially held prisoner in her home for over a year because cyberattackers intercepted her Uber requests, and that the Governor of Florida advised her that he could not help her due to orders “from D.C.” Respondent’s testimony demonstrated that she is still in a delusional state. Tr. V.1, p. 74; Tr. V.2, pp. 210, 212.

47. Throughout the previous two years, Respondent has repeatedly demonstrated paranoid delusions regarding what she believes is a vast conspiracy against her launched by Teledoc, despite the lack of evidence to support her claims and her friends and family telling her that they are untrue beliefs. P. Ex. 10, p. 4; Tr. V.1, pp. 70-71.

48. Respondent continues to believe that common technological issues or inconveniences are evidence of the alleged conspiracy, such as receiving spam phishing emails or texts, her laptop restarting, her thermostat not working, her Uber going to the wrong address, or issues with her wireless internet router. Respondent’s attribution of simple technological problems or random coincidences to a coordinated conspiracy are not based in reality. Tr.

V.1, pp. 35-36; Tr. V.2, pp. 215-16, 222-23; R. Ex. 21.; R. Ex. 10; R. Ex. 12; R. Ex. 24.

49. It is possible that Respondent is the victim of identity theft or similar fraud, as some of the exhibits that Respondent submitted demonstrate that she has experienced issues with some of her personal accounts;⁵ however, there is no evidence to support that any alleged interference with Respondent's phone or email, banking accounts, or social media accounts have been caused by Teledoc. R. Ex. 26; R. Ex. 29; R. Ex. 33.

50. Additionally, Respondent believes that this widespread conspiracy involves numerous individuals and entities, including believing that the instant case is a part of Teledoc's retaliation efforts against her. Of utmost concern is Respondent's belief that her medical patients were actors, FBI agents, or are otherwise involved in the scheme against her. P. Ex. 1; P. Ex. 4, pp. 68-69, 228; P. Ex. 10; P. Ex. 8, p. 35; Tr. V.1, p. 51; Tr. V.2, pp. 222-23.

51. Respondent's delusions about innocent people being involved in the alleged conspiracy demonstrate her distrust towards individuals and institutions. This distrust presents a risk for medical patients seeking care, as Respondent may determine that a random patient is working with Teledoc, which could adversely affect the physician-patient relationship and hinder patient care. Tr. V.1, p. 162.

52. Based on Respondent's history and her presentation at the time of the hearing, Respondent's symptoms of psychosis remain uncontrolled and severe. Tr. V.2, pp. 159-62, 164; P. Ex. 1.

53. The ongoing symptoms of Respondent's psychosis have resulted in continued impairment of Respondent's judgment, insight, and reasoning. Tr. V.1, p. 51; P. Ex. 1, p. 7.

⁵ It is also possible that, in her efforts to report the alleged conspiracy to various individuals and entities, Respondent is disseminating personal information to unintended parties, thereby facilitating further compromises or breaches to the safety of her personal accounts.

54. Based on the foregoing, Respondent is unable to practice osteopathic medicine with reasonable skill and safety to patients due to her unspecified psychosis. Tr. V.2, pp. 161-62, 165; P. Ex. 1, p. 10.

55. Petitioner proved by clear and convincing evidence that Respondent was, and currently is, unable to practice as an osteopathic physician with reasonable skill and safety to patients by reason of illness or use of alcohol, drugs, narcotics, or chemicals or any other type of material or as a result of any mental or physical condition.

CONCLUSIONS OF LAW

56. DOAH has jurisdiction over the subject matter of this proceeding and of the parties thereto pursuant to sections 120.569 and 120.57(1), Florida Statutes (2024).

57. A proceeding, such as this one, to suspend, revoke, or impose other discipline upon a license is penal in nature. State ex rel. Vining v. Fla. Real Estate Comm'n, 281 So. 2d 487, 491 (Fla. 1973). Accordingly, to impose such discipline, Petitioner must prove the allegations in the Administrative Complaint by clear and convincing evidence. Dep't of Banking & Fin., Div. of Sec. & Inv. Prot. v. Osborne Stern & Co., 670 So. 2d 932, 933-34 (Fla. 1996) (citing Ferris v. Turlington, 510 So. 2d 292, 294-95 (Fla. 1987)); Nair v. Dep't of Bus. & Pro. Regul., Bd. of Med., 654 So. 2d 205, 207 (Fla. 1st DCA 1995).

58. Clear and convincing evidence “require[s] that the witnesses to a fact must be found to be credible; the facts to which the witnesses testify must be distinctly remembered;... the testimony must be clear, direct and weighty, and the witnesses must be lacking in confusion as to the facts in issue.” In re Davey, 645 So. 2d 398, 404 (Fla. 1994) (quoting Slomowitz v. Walker, 429 So. 2d 797, 800 (Fla. 4th DCA 1983)). Additionally, the evidence must be of such weight that it “produces in the mind of the trier of fact a firm belief or conviction, without hesitancy, as to the truth of the precise facts in issue.” Id.

59. The clear and convincing evidence standard “may be met where the evidence is in conflict... [but] it seems to preclude the evidence that is ambiguous.” Westinghouse Elec. Corp., Inc. v. Shuler Bros., Inc., 590 So. 2d 986, 988 (Fla. 1st DCA 1991) (citations omitted), rev. denied, 599 So. 2d 1279 (Fla. 1992).

60. Disciplinary statutes and rules “must be construed strictly, in favor of the one against whom the penalty would be imposed.” Munch v. Dep’t of Pro. Regul., Div. of Real Estate, 592 So. 2d 1136, 1143 (Fla. 1st DCA 1992); see Camejo v. Dep’t of Bus. & Pro. Regul., 812 So. 2d 583, 583-84 (Fla. 3d DCA 2002); McClung v. Crim. Just. Standards & Training Comm’n, 458 So. 2d 887, 888 (Fla. 5th DCA 1984) (“[W]here a statute provides for revocation of a license the grounds must be strictly construed because the statute is penal in nature. No conduct is to be regarded as included within a penal statute that is not reasonably proscribed by it; if there are any ambiguities included, they must be construed in favor of the licensee.” (citing State v. Pattishall, 126 So. 147 (Fla. 1930))).

61. The grounds proving Petitioner’s assertion that Respondent’s license should be disciplined must be those specifically alleged in the Administrative Complaint. See e.g., Trevisani v. Dep’t of Health, 908 So. 2d 1108 (Fla. 1st DCA 2005); Kinney v. Dep’t of State, 501 So. 2d 129 (Fla. 5th DCA 1987); and Hunter v. Dep’t of Pro. Regul., 458 So. 2d 842 (Fla. 2d DCA 1984).

62. Due process prohibits the Department from taking disciplinary action against a licensee based on matters not specifically alleged in the charging instrument unless those matters have been tried by consent. See Shore Vill. Prop. Owners’ Ass’n, Inc. v. Dep’t of Env’t Prot., 824 So. 2d 208, 210 (Fla. 4th DCA 2002); and Delk v. Dep’t of Pro. Regul., 595 So. 2d 966, 967 (Fla. 5th DCA 1992).

63. Section 459.015(1)(w) authorizes discipline against an osteopathic medical doctor for being unable to practice osteopathic medicine with reasonable skill and safety to patients by reason of illness or use of alcohol, drugs, narcotics, or chemicals or any other type of material or as a result of any mental or physical condition.

64. The parties agree that the factual allegations contained in the Complaint, if proven by clear and convincing evidence, constitute impairment or disciplinable conduct.

65. The facts to which Theodore R. Treese, M.D., testified were distinctly remembered, and his testimony regarding the factual allegations contained in the Administrative Complaint was clear, direct, and weighty. Dr. Treese's testimony is credited.

66. The facts to which Robert Dahlin, D.O., testified were distinctly remembered, and his testimony regarding the factual allegations contained in the Administrative Complaint was clear, direct, and weighty. Dr. Dahlin's testimony is credited.

67. Respondent's own testimony at the final hearing was further compelling evidence to show that she continues to exhibit signs of psychosis and is unable to practice osteopathic medicine with reasonable skill and safety to patients.

68. Petitioner proved by clear and convincing evidence that Respondent was, and is currently, not able to practice osteopathic medicine with reasonable skill and safety to patients as a result of Respondent's unspecified psychosis.

69. Petitioner proved by clear and convincing evidence that Respondent violated section 459.015(1)(w) by being unable to practice as an osteopathic physician with reasonable skill and safety to patients by reason of illness or use of alcohol, drugs, narcotics, or chemicals or any other type of material or as a result of any mental or physical condition.

70. Penalties in a licensure discipline case may not exceed those in effect at the time a violation was committed. Willner v. Dep't of Pro. Regul., Bd. of Med., 563 So. 2d 805, 806 (Fla. 1st DCA 1990), rev. denied, 576 So. 2d 295 (Fla. 1991).

71. Section 456.079, Florida Statutes (2023), requires the Board to adopt disciplinary guidelines for specific offenses. Penalties imposed must be consistent with any disciplinary guidelines prescribed by rule. See Parrot Heads, Inc. v. Dep't of Bus. & Pro. Regul., 741 So. 2d 1231, 1233-34 (Fla. 5th DCA 1999).

72. Rule 64B15-19.002, Florida Administrative Code (effective November 24, 2020, to present), provides that the disciplinary range for a first-time violation of section 459.015(1)(w) is a minimum of probation and a \$2,500 fine up to a maximum of suspension until licensee is able to demonstrate to the Board ability to practice with reasonable skill and safety to be followed by probation and \$5,000 fine.

73. In this case, Respondent has not taken any steps to become able to practice with reasonable skill and safety. Therefore, the appropriate penalty would be imposition of a suspension until Respondent is able to demonstrate to the Board her ability to practice with reasonable skill and safety.

74. Section 456.072(4), Florida Statutes (2023), provides that in addition to any other discipline imposed for violation of a practice act, the board shall assess costs related to the investigation and prosecution of the case.

RECOMMENDATION

Based on the foregoing Findings of Fact and Conclusions of Law, it is RECOMMENDED that the Board of Osteopathic Medicine enter a Final Order finding Heidi Marjaana Lahtenmaa, D.O., violated section 459.015(1)(w), suspending her license until she is able to demonstrate to the Board the ability to practice with reasonable skill and safety, such demonstration of skill and

safety shall include an evaluation by the Physicians Resource Network, and imposing costs of investigation and prosecution.

DONE AND ENTERED this ____ day of _____, 2025, in
Tallahassee, Leon County, Florida.

Robert S. Cohen
Administrative Law Judge
Division of Administrative Hearings
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Filed with the Clerk of the
Division of Administrative Hearings
This ____ day of _____, 2025

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NOTICE OF RIGHT TO SUBMIT EXCEPTIONS

All parties have the right to submit written exceptions within 15 days from the date of this Recommended Order. Any exceptions to this Recommended Order should be filed with the agency clerk of the agency that will issue the Final Order in this case.

Respectfully Submitted this 22 day of September, 2025.

Joseph A. Ladapo, M.D., Ph.D.
State Surgeon General

/s/ Michael Morris

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the forgoing has been furnished, via email to Respondent at 3842job2@gmail.com and via US mail to 311 Gold Road, Ste. 1000 #1007, West Palm Beach, Florida 33407, on this 22 day of September, 2025.

/s/ Michael Morris

Michael Morris
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