

**STATE OF FLORIDA
DEPARTMENT OF HEALTH**

DEPARTMENT OF HEALTH,

PETITIONER,

v.

**DOAH CASE NO.: 24-4162PL
DOH CASE NO.: 2023-54547**

HEIDI MARJANNA LAHTENMAA, D.O.,

RESPONDENT.

_____ /

MOTION FOR FINAL ORDER

COMES NOW, Petitioner, the Department of Health, by and through its undersigned counsel and moves the Board of Osteopathic Medicine to enter a Final Order in the above-styled cause. As grounds therefore, the Petitioner states:

1. Petitioner is the state agency charged with regulating the practice of osteopathic medicine pursuant to chapters 456 and 459, Florida Statutes (2025).

2. On August 26, 2024, Petitioner filed an Administrative Complaint against Respondent alleging Respondent violated section 459.015(1)(w), Florida Statutes (2024).

3. Respondent timely disputed the allegations and requested for the case to be heard by an Administrative Law Judge, pursuant to section 120.57(1), Florida Statutes.

4. On November 7, 2024, the case was filed with the Division of Administrative Hearings (DOAH) and assigned Case Number 24-4162PL.

5. The final hearing was held on August 5, 2025, via Zoom Video Conference.

6. On October 14, 2025, the Administrative Law Judge issued a Recommended Order that the Board of Osteopathic Medicine enter a Final Order finding Respondent violated section 459.015(1)(w), Florida Statutes; suspending her license until she is able to practice with reasonable skill and safety, with such demonstration of skill and safety including an evaluation by PRN; and imposing the costs of the investigation and prosecution of this matter.

7. Respondent has been advised by a copy of this motion that the Board will consider the record as defined by section 120.57(1)(f), Florida Statutes.

WHEREFORE, Petitioner requests that this Honorable Board enter a Final Order in this case.

Respectfully submitted,

Michael Morris

Michael Morris, Esq.
Assistant General Counsel
DOH Prosecution Services Unit
4052 Bald Cypress Way, Bin C-65
Tallahassee, FL 32399-3265
Florida Bar Number 0081493
(P) (850) 558-9868
(F) (850) 245-4662
(E) Michael.Morris@flhealth.gov

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing has been provided by U.S. Mail this 22nd day of October, 2025, to 311 Golf Road, Suite 1000 #1007, West Palm Beach, FL 33407, and by email at heidi.lahteenmaa@hotmail.com and 3842job2@gmail.com.

Michael Morris

Michael Morris, Esq.
Assistant General Counsel

**STATE OF FLORIDA
DEPARTMENT OF HEALTH**

DEPARTMENT OF HEALTH,

Petitioner,

v.

CASE NO. 2023-54547

HEIDI MARJANNA LAHTENMAA, D.O.,

Respondent.

_____ /

MOTION TO ASSESS COSTS
IN ACCORDANCE WITH SECTION 456.072(4)

The Department of Health, by and through counsel, and moves the Board of Osteopathic Medicine ("Board") for entry of a Final Order assessing costs against Respondent for the investigation and prosecution of this case in accordance with section 456.072(4), Florida Statutes. As grounds therefore, the Petitioner states the following:

1. At its next regularly scheduled meeting, the Board will take up for consideration the above-styled disciplinary action and will enter a Final Order therein.

2. Section 456.072(4), states, in pertinent part, that:

In addition to any other discipline imposed through final order, or citation, entered on or after July 1, 2001, under this section or discipline imposed through final order, or

citation, entered on or after July 1, 2001, for a violation of any practice act, the board, or the department when there is no board, shall assess costs related to the investigation and prosecution of the case. The costs related to the investigation and prosecution include, but are not limited to, salaries and benefits of personnel, costs related to the time spent by the attorney and other personnel working on the case, and any other expenses incurred by the department for the case. The board, or the department when there is no board, shall determine the amount of costs to be assessed after its consideration of an affidavit of itemized costs and any written objections thereto....

3. As evidenced in the attached affidavit (Exhibit A), the investigation and prosecution of this case has resulted in costs in the total amount of \$42,898.61.

4. The Department is requesting attorney time in the amount of \$23,372.08. The attached outside attorney affidavit (Exhibit B) and accompanying prosecuting attorney affidavit(s) (Exhibit C) indicate that the Department's attorney time in this case is reasonable and justifiable.

5. Should Respondent file written objections to the assessment of costs, within ten (10) days of the date of this motion, specifying the grounds for the objections and the specific elements of the costs to which objections are made, Petitioner requests that the Board determine the

amount of costs to be assessed based upon its consideration of the affidavit attached as Exhibit A and any timely-filed written objections.

6. Petitioner requests that the Board grant this motion and assess costs in the amount of \$42,898.61 as supported by competent, substantial evidence. This assessment of costs is in addition to any other discipline imposed by the Board and is in accordance with section 456.072(4).

WHEREFORE, the Department of Health requests that the Board enter a Final Order assessing costs against Respondent.

Dated this 15th day of October, 2025.

Michael Morris
Michael Morris, Esq.
Assistant General Counsel
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DOH Prosecution Services Unit
4052 Bald Cypress Way, Bin C-65
Tallahassee, FL 32399-3265
(p) 850-558-9868
(f) 850-245-4662
(e) Michael.Morris@flhealth.gov

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion to Assess Costs has been provided by mail to Respondent, at 311 Golf Road, Suite 1000 #1007, West Palm Beach, FL 33407, and by email at heidi.lahteenmaa@hotmail.com and 3842job2@gmail.com, this 22nd day of October, 2025.

Michael Morris, Esq.
Assistant General Counsel

AFFIDAVIT OF FEES AND COSTS EXPENDED

STATE OF FLORIDA
COUNTY OF LEON:

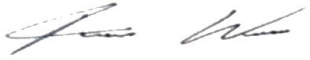
BEFORE ME, the undersigned authority, personally appeared **JORDAN WARNER** who was sworn and states as follows:

- 1) My name is Jordan Warner.
- 2) I am over the age of 18, competent to testify, and make this affidavit upon my own personal knowledge and after review of the records at the Florida Department of Health (DOH).
- 3) I am the acting Investigation Manager for the Consumer Services and Compliance Management Unit for DOH. The Consumer Services Unit is where all complaints against Florida health care licensees (e.g., medical doctors, dentists, nurses, respiratory therapists) are officially filed. I have been in my current job position for more than one year. My business address is 4052 Bald Cypress Way, Bin C-75 Tallahassee, Florida 32399-3275.
- 4) As Investigation Manager of the Consumer Services and Compliance Management Unit, my job duties include reviewing data in the Time Tracking System and verifying that the amounts correspond. The Time Tracking System is a computer program which records and tracks DOH's costs regarding the investigation and prosecution of cases against Florida health care licensees.
- 5) As of today, DOH's total costs for investigating and prosecuting DOH case number(s) **2023-54547** (Department of Health v **Heidi Marjanna Lahteenmaa, D.O.**) are **FOURTY TWO THOUSAND EIGHT HUNDRED NINETY-EIGHT DOLLARS AND SIXTY-ONE CENTS(\$42,898.61)**.
- 6) The costs for DOH case numbers **2023-54547** (Department of Health v **Heidi Marjanna Lahteenmaa, D.O.**) are summarized in Exhibit 1 (Cost Summary Report), which is attached to this document.
- 7) The itemized costs and expenses for DOH case numbers **2023-54547** (Department of Health v **Heidi Marjanna Lahteenmaa, D.O.**) are detailed in Exhibit 2 (Itemized Cost Report and Itemized Expense Report and receipts), which is attached to this document.
- 8) The itemized costs as reflected in Exhibit 2 are determined by the following method: DOH employees who work on cases daily are to keep track of their time in six-minute increments (e.g., investigators

and lawyers). A designated DOH employee in the Consumer Services Unit, Legal Department, and in each area office, inputs the time worked and expenses spent into the Time Tracking System. Time and expenses are charged against a state health care Board (e.g., Florida Board of Medicine, Florida Board of Dentistry, Florida Board of Osteopathic Medicine), and/or a case. If no Board or case can be charged, then the time and expenses are charged as administrative time. The hourly rate of each employee is calculated by formulas established by the Department. (See the Itemized Cost Report)

- 9) Jordan Warner, first being duly sworn, states that she has read the foregoing Affidavit and its attachments and the statements contained therein are true and correct to the best of her knowledge and belief.

FURTHER AFFIANT SAYETH NOT.



Jordan Warner, Affiant

State of Florida
County of Leon

Sworn to and subscribed before me this 15th day of October, 2025,
by Jordan Warner, who is personally known to me.



Notary Signature

Erin Lawhon

Name of Notary Printed

Stamp Commissioned Name of Notary Public:

Report Run Date: 10/15/2025 2:46:33 PM

*****CONFIDENTIAL*****
Time Tracking System
Itemized Cost by Complaint
Complaint 202354547

Report Date:10/15/2025 2:48:20 PM

Staff Code	Activity Hours	Staff Rate	Cost	Billing Code	Activity Date	Activity Description
COMPLIANCE MANAGEMENT UNIT(CMU)						
HC27	0.05	\$44.43	\$2.22	125	8/7/2024	LICENSE STATUS CHANGE
Sub Total	0.05		\$2.22			
CONSUMER SERVICES UNIT(CSU)						
HA259	0.10	\$72.08	\$7.21	1	1/27/2025	ROUTINE ADMINISTRATIVE DUTIES
HA52	0.10	\$72.08	\$7.21	25	11/19/2024	REVIEW CASE FILE
HA52	0.10	\$72.08	\$7.21	64	11/19/2024	LEGAL ADVICE/DISCUSSION - BOARD OFFICE,DEPT STAFF OR ATTY GEN OFFICE
HA52	0.50	\$72.08	\$36.04	78	12/27/2023	INITIAL REVIEW AND ANALYSIS OF COMPLAINT
Sub Total	0.80		\$57.67			
INVESTIGATIVE SERVICES UNIT(ISU)						
WI166	0.50	\$95.36	\$47.68	1	6/11/2025	ROUTINE ADMINISTRATIVE DUTIES
WI150	2.50	\$95.36	\$238.40	4	12/27/2023	ROUTINE INVESTIGATIVE WORK
WI150	1.00	\$95.36	\$95.36	4	1/4/2024	ROUTINE INVESTIGATIVE WORK
WI150	1.50	\$95.36	\$143.04	4	1/8/2024	ROUTINE INVESTIGATIVE WORK
WI150	1.50	\$95.36	\$143.04	4	1/9/2024	ROUTINE INVESTIGATIVE WORK
WI110	0.60	\$95.36	\$57.22	4	2/20/2024	ROUTINE INVESTIGATIVE WORK
WI154	0.50	\$95.36	\$47.68	4	8/20/2024	ROUTINE INVESTIGATIVE WORK
WI166	0.50	\$95.36	\$47.68	4	7/21/2025	ROUTINE INVESTIGATIVE WORK
WI154	0.30	\$95.36	\$28.61	4	1/8/2025	ROUTINE INVESTIGATIVE WORK
TI206	1.00	\$95.36	\$95.36	4	3/12/2025	ROUTINE INVESTIGATIVE WORK
TI206	1.00	\$95.36	\$95.36	4	3/12/2025	ROUTINE INVESTIGATIVE WORK
WI166	1.00	\$95.36	\$95.36	4	6/18/2025	ROUTINE INVESTIGATIVE WORK
WI166	0.50	\$95.36	\$47.68	4	6/25/2025	ROUTINE INVESTIGATIVE WORK
WI166	0.50	\$95.36	\$47.68	4	6/27/2025	ROUTINE INVESTIGATIVE WORK
WI150	0.60	\$95.36	\$57.22	6	1/12/2024	SUPPLEMENTAL INVESTIGATION
WI150	0.50	\$95.36	\$47.68	6	1/26/2024	SUPPLEMENTAL INVESTIGATION
WI150	1.00	\$95.36	\$95.36	6	1/30/2024	SUPPLEMENTAL INVESTIGATION
WI150	0.20	\$95.36	\$19.07	6	1/31/2024	SUPPLEMENTAL INVESTIGATION
WI150	0.50	\$95.36	\$47.68	6	2/1/2024	SUPPLEMENTAL INVESTIGATION
WI150	1.50	\$95.36	\$143.04	6	2/2/2024	SUPPLEMENTAL INVESTIGATION
WI150	0.50	\$95.36	\$47.68	6	1/8/2025	SUPPLEMENTAL INVESTIGATION
LI77	0.10	\$95.36	\$9.54	6	2/12/2025	SUPPLEMENTAL INVESTIGATION

Staff Code	Activity Hours	Staff Rate	Cost	Billing Code	Activity Date	Activity Description
WI71	0.60	\$95.36	\$57.22	6	6/10/2025	SUPPLEMENTAL INVESTIGATION
WI110	0.20	\$95.36	\$19.07	6	6/10/2025	SUPPLEMENTAL INVESTIGATION
WI150	0.50	\$95.36	\$47.68	6	12/3/2024	SUPPLEMENTAL INVESTIGATION
WI150	0.50	\$95.36	\$47.68	6	12/2/2024	SUPPLEMENTAL INVESTIGATION
WI150	1.50	\$95.36	\$143.04	6	12/4/2024	SUPPLEMENTAL INVESTIGATION
WI150	0.40	\$95.36	\$38.14	6	12/6/2024	SUPPLEMENTAL INVESTIGATION
WI150	0.20	\$95.36	\$19.07	6	12/18/2024	SUPPLEMENTAL INVESTIGATION
WI150	0.20	\$95.36	\$19.07	6	12/30/2024	SUPPLEMENTAL INVESTIGATION
WI154	0.40	\$95.36	\$38.14	6	8/12/2024	SUPPLEMENTAL INVESTIGATION
WI150	1.00	\$95.36	\$95.36	6	8/12/2024	SUPPLEMENTAL INVESTIGATION
WI150	0.40	\$95.36	\$38.14	6	8/21/2024	SUPPLEMENTAL INVESTIGATION
WI150	0.10	\$95.36	\$9.54	6	8/22/2024	SUPPLEMENTAL INVESTIGATION
WI150	1.00	\$95.36	\$95.36	6	11/20/2024	SUPPLEMENTAL INVESTIGATION
WI150	1.00	\$95.36	\$95.36	6	11/26/2024	SUPPLEMENTAL INVESTIGATION
WI150	0.50	\$95.36	\$47.68	6	3/14/2024	SUPPLEMENTAL INVESTIGATION
WI150	0.50	\$95.36	\$47.68	6	3/22/2024	SUPPLEMENTAL INVESTIGATION
WI150	1.00	\$95.36	\$95.36	6	3/26/2024	SUPPLEMENTAL INVESTIGATION
WI150	0.10	\$95.36	\$9.54	6	3/27/2024	SUPPLEMENTAL INVESTIGATION
WI154	0.50	\$95.36	\$47.68	6	8/8/2024	SUPPLEMENTAL INVESTIGATION
WI150	0.50	\$95.36	\$47.68	6	8/8/2024	SUPPLEMENTAL INVESTIGATION
WI150	1.50	\$95.36	\$143.04	6	2/19/2024	SUPPLEMENTAL INVESTIGATION
WI150	0.50	\$95.36	\$47.68	6	2/20/2024	SUPPLEMENTAL INVESTIGATION
WI150	1.50	\$95.36	\$143.04	6	2/27/2024	SUPPLEMENTAL INVESTIGATION
WI150	0.20	\$95.36	\$19.07	6	2/28/2024	SUPPLEMENTAL INVESTIGATION
WI150	1.00	\$95.36	\$95.36	6	3/12/2024	SUPPLEMENTAL INVESTIGATION
WI150	1.50	\$95.36	\$143.04	6	3/13/2024	SUPPLEMENTAL INVESTIGATION
WI150	0.50	\$95.36	\$47.68	6	2/5/2024	SUPPLEMENTAL INVESTIGATION
WI150	0.50	\$95.36	\$47.68	6	2/6/2024	SUPPLEMENTAL INVESTIGATION
WI150	0.50	\$95.36	\$47.68	6	2/9/2024	SUPPLEMENTAL INVESTIGATION
WI150	0.50	\$95.36	\$47.68	6	2/12/2024	SUPPLEMENTAL INVESTIGATION
WI150	1.00	\$95.36	\$95.36	6	2/15/2024	SUPPLEMENTAL INVESTIGATION
WI150	1.00	\$95.36	\$95.36	6	2/16/2024	SUPPLEMENTAL INVESTIGATION
WI110	0.90	\$95.36	\$85.82	58	2/20/2024	TRAVEL TIME
LI142	0.60	\$95.36	\$57.22	58	1/30/2025	TRAVEL TIME
TI206	0.50	\$95.36	\$47.68	58	3/13/2025	TRAVEL TIME
WI161	0.50	\$95.36	\$47.68	58	6/10/2025	TRAVEL TIME
WI161	0.50	\$95.36	\$47.68	58	6/10/2025	TRAVEL TIME
WI150	1.00	\$95.36	\$95.36	76	1/9/2024	REPORT WRITING

Staff Code	Activity Hours	Staff Rate	Cost	Billing Code	Activity Date	Activity Description
WI150	1.50	\$95.36	\$143.04	76	3/26/2024	REPORT WRITING
WI150	0.50	\$95.36	\$47.68	76	8/22/2024	REPORT WRITING
LI142	2.00	\$95.36	\$190.72	76	2/3/2025	REPORT WRITING
WI166	1.00	\$95.36	\$95.36	76	7/10/2025	REPORT WRITING
WI147	1.50	\$95.36	\$143.04	100	3/8/2024	SERVICE OF PROCESS (AC, ERO, ESO, SUBPOENA)
WI147	2.00	\$95.36	\$190.72	100	3/12/2024	SERVICE OF PROCESS (AC, ERO, ESO, SUBPOENA)
WI147	2.50	\$95.36	\$238.40	100	3/22/2024	SERVICE OF PROCESS (AC, ERO, ESO, SUBPOENA)
WI154	0.20	\$95.36	\$19.07	100	8/12/2024	SERVICE OF PROCESS (AC, ERO, ESO, SUBPOENA)
WI154	0.20	\$95.36	\$19.07	100	8/14/2024	SERVICE OF PROCESS (AC, ERO, ESO, SUBPOENA)
WI154	0.20	\$95.36	\$19.07	100	8/19/2024	SERVICE OF PROCESS (AC, ERO, ESO, SUBPOENA)
TI206	1.00	\$95.36	\$95.36	100	3/14/2025	SERVICE OF PROCESS (AC, ERO, ESO, SUBPOENA)
WI161	0.30	\$95.36	\$28.61	100	6/10/2025	SERVICE OF PROCESS (AC, ERO, ESO, SUBPOENA)
WI154	0.40	\$95.36	\$38.14	100	8/22/2024	SERVICE OF PROCESS (AC, ERO, ESO, SUBPOENA)
WI121	1.00	\$95.36	\$95.36	100	11/26/2024	SERVICE OF PROCESS (AC, ERO, ESO, SUBPOENA)
WI154	0.20	\$95.36	\$19.07	100	11/26/2024	SERVICE OF PROCESS (AC, ERO, ESO, SUBPOENA)
WI154	0.20	\$95.36	\$19.07	100	12/2/2024	SERVICE OF PROCESS (AC, ERO, ESO, SUBPOENA)
LI142	2.00	\$95.36	\$190.72	100	1/30/2025	SERVICE OF PROCESS (AC, ERO, ESO, SUBPOENA)
TI206	1.00	\$95.36	\$95.36	100	3/13/2025	SERVICE OF PROCESS (AC, ERO, ESO, SUBPOENA)
WI150	1.50	\$95.36	\$143.04	176	1/9/2024	REPORT PREPARATION
WI150	1.00	\$95.36	\$95.36	176	2/6/2024	REPORT PREPARATION
WI150	0.50	\$95.36	\$47.68	176	8/22/2024	REPORT PREPARATION
CI88	1.20	\$88.45	\$106.14	9006	12/6/2024	UL-SUPPLEMENTAL INVESTIGATION
CI88	1.40	\$88.45	\$123.83	9058	12/9/2024	UL-TRAVEL TIME
CI88	1.20	\$88.45	\$106.14	9076	12/9/2024	UL-REPORT WRITING
CI88	1.20	\$88.45	\$106.14	9176	12/9/2024	ULA REPORT PREPARATION
Sub Total	68.80		\$6526.21			
PROSECUTION SERVICES UNIT(PSU)						
HLL134A	0.80	\$126.61	\$101.29	25	1/17/2024	REVIEW CASE FILE
HLL134A	1.00	\$126.61	\$126.61	25	2/15/2024	REVIEW CASE FILE
HLL134A	0.30	\$126.61	\$37.98	25	4/29/2024	REVIEW CASE FILE
HLL134A	0.30	\$126.61	\$37.98	25	6/3/2024	REVIEW CASE FILE
HLL134A	0.30	\$126.61	\$37.98	25	10/1/2024	REVIEW CASE FILE
HLL134A	0.30	\$126.61	\$37.98	25	10/7/2024	REVIEW CASE FILE
HLL134A	0.20	\$126.61	\$25.32	25	6/9/2025	REVIEW CASE FILE
HLL134A	2.00	\$126.61	\$253.22	25	6/17/2025	REVIEW CASE FILE
HLL134A	2.50	\$126.61	\$316.52	26	10/23/2024	PREPARE OR REVISE MEMORANDUM
HLL134A	1.00	\$126.61	\$126.61	28	7/9/2024	PREPARE OR REVISE ADMINISTRATIVE COMPLAINT
HLL162A	0.20	\$126.61	\$25.32	29	7/10/2024	REVIEW ADMINISTRATIVE COMPLAINT

Staff Code	Activity Hours	Staff Rate	Cost	Billing Code	Activity Date	Activity Description
HLL134A	0.50	\$126.61	\$63.30	36	9/24/2024	PREPARATION OR REVISION OF LETTER
HLL134A	1.70	\$126.61	\$215.24	36	4/8/2025	PREPARATION OR REVISION OF LETTER
HLL134A	2.00	\$126.61	\$253.22	38	12/3/2024	REVIEW DISCOVERY REQUESTS/RESPONSES
HLL134A	4.00	\$126.61	\$506.44	39	10/24/2024	PREPARE/RESPOND TO DISCOVERY
HLL134A	2.00	\$126.61	\$253.22	39	11/8/2024	PREPARE/RESPOND TO DISCOVERY
HLL134A	4.00	\$126.61	\$506.44	39	11/13/2024	PREPARE/RESPOND TO DISCOVERY
HLL134A	4.00	\$126.61	\$506.44	39	11/15/2024	PREPARE/RESPOND TO DISCOVERY
HLL134A	1.00	\$126.61	\$126.61	39	1/10/2025	PREPARE/RESPOND TO DISCOVERY
HLL134A	0.50	\$126.61	\$63.30	39	6/20/2025	PREPARE/RESPOND TO DISCOVERY
HLL134A	1.70	\$126.61	\$215.24	39	7/14/2025	PREPARE/RESPOND TO DISCOVERY
HLL134A	1.00	\$126.61	\$126.61	40	2/6/2024	PREPARATION OF OR REVISION OF A PLEADING
HLL134A	0.50	\$126.61	\$63.30	40	2/14/2024	PREPARATION OF OR REVISION OF A PLEADING
HLL134A	0.80	\$126.61	\$101.29	40	7/3/2024	PREPARATION OF OR REVISION OF A PLEADING
HLL134A	1.00	\$126.61	\$126.61	40	11/14/2024	PREPARATION OF OR REVISION OF A PLEADING
HLL134A	2.00	\$126.61	\$253.22	40	11/19/2024	PREPARATION OF OR REVISION OF A PLEADING
HLL134A	2.00	\$126.61	\$253.22	40	11/20/2024	PREPARATION OF OR REVISION OF A PLEADING
HLL134A	1.80	\$126.61	\$227.90	40	8/19/2025	PREPARATION OF OR REVISION OF A PLEADING
HLL134A	1.00	\$126.61	\$126.61	40	8/22/2025	PREPARATION OF OR REVISION OF A PLEADING
HLL134A	2.70	\$126.61	\$341.85	40	8/20/2025	PREPARATION OF OR REVISION OF A PLEADING
HLL134A	1.00	\$126.61	\$126.61	40	8/22/2025	PREPARATION OF OR REVISION OF A PLEADING
HLL134A	0.50	\$126.61	\$63.30	40	8/25/2025	PREPARATION OF OR REVISION OF A PLEADING
HLL134A	1.00	\$126.61	\$126.61	40	8/7/2025	PREPARATION OF OR REVISION OF A PLEADING
HLL134A	1.00	\$126.61	\$126.61	40	8/8/2025	PREPARATION OF OR REVISION OF A PLEADING
HLL134A	0.50	\$126.61	\$63.30	40	8/11/2025	PREPARATION OF OR REVISION OF A PLEADING
HLL134A	0.50	\$126.61	\$63.30	40	8/12/2025	PREPARATION OF OR REVISION OF A PLEADING
HLL134A	1.00	\$126.61	\$126.61	40	8/15/2025	PREPARATION OF OR REVISION OF A PLEADING
HLL134A	0.80	\$126.61	\$101.29	40	8/18/2025	PREPARATION OF OR REVISION OF A PLEADING
HLL134A	1.80	\$126.61	\$227.90	40	11/25/2024	PREPARATION OF OR REVISION OF A PLEADING
HLL134A	1.50	\$126.61	\$189.92	40	12/13/2024	PREPARATION OF OR REVISION OF A PLEADING
HLL134A	1.00	\$126.61	\$126.61	40	2/17/2025	PREPARATION OF OR REVISION OF A PLEADING
HLL134A	0.70	\$126.61	\$88.63	40	3/6/2025	PREPARATION OF OR REVISION OF A PLEADING
HLL134A	1.40	\$126.61	\$177.25	40	6/18/2025	PREPARATION OF OR REVISION OF A PLEADING
HLL134A	1.00	\$126.61	\$126.61	40	8/6/2025	PREPARATION OF OR REVISION OF A PLEADING
HLL134A	4.00	\$126.61	\$506.44	43	11/26/2024	PREPARE FOR DEPOSITION

Staff Code	Activity Hours	Staff Rate	Cost	Billing Code	Activity Date	Activity Description
HLL134A	2.50	\$126.61	\$316.52	43	12/5/2024	PREPARE FOR DEPOSITION
HLL134A	1.00	\$126.61	\$126.61	43	12/6/2024	PREPARE FOR DEPOSITION
HLL134A	2.00	\$126.61	\$253.22	44	12/10/2024	DEPOSITIONS
HLL134A	0.50	\$126.61	\$63.30	47	11/12/2024	TRIAL PREPARATION
HLL134A	0.50	\$126.61	\$63.30	47	1/6/2025	TRIAL PREPARATION
HLL134A	2.50	\$126.61	\$316.52	47	1/7/2025	TRIAL PREPARATION
HLL134A	1.00	\$126.61	\$126.61	47	1/15/2025	TRIAL PREPARATION
HLL134A	1.00	\$126.61	\$126.61	47	1/21/2025	TRIAL PREPARATION
HLL134A	0.50	\$126.61	\$63.30	47	1/24/2025	TRIAL PREPARATION
HLL134A	3.00	\$126.61	\$379.83	47	8/4/2025	TRIAL PREPARATION
HLL134A	3.50	\$126.61	\$443.14	47	7/23/2025	TRIAL PREPARATION
HLL134A	3.80	\$126.61	\$481.12	47	7/24/2025	TRIAL PREPARATION
HLL134A	1.60	\$126.61	\$202.58	47	7/25/2025	TRIAL PREPARATION
HLL134A	2.80	\$126.61	\$354.51	47	7/29/2025	TRIAL PREPARATION
HLL134A	1.50	\$126.61	\$189.92	47	7/31/2025	TRIAL PREPARATION
HLL134A	0.50	\$126.61	\$63.30	47	8/1/2025	TRIAL PREPARATION
HLL134A	4.00	\$126.61	\$506.44	47	7/7/2025	TRIAL PREPARATION
HLL134A	2.30	\$126.61	\$291.20	47	7/8/2025	TRIAL PREPARATION
HLL134A	1.00	\$126.61	\$126.61	47	7/10/2025	TRIAL PREPARATION
HLL134A	2.00	\$126.61	\$253.22	47	7/18/2025	TRIAL PREPARATION
HLL134A	0.50	\$126.61	\$63.30	47	7/21/2025	TRIAL PREPARATION
HLL134A	4.30	\$126.61	\$544.42	47	7/22/2025	TRIAL PREPARATION
HLL134A	1.00	\$126.61	\$126.61	47	5/5/2025	TRIAL PREPARATION
HLL134A	0.50	\$126.61	\$63.30	47	5/20/2025	TRIAL PREPARATION
HLL134A	0.50	\$126.61	\$63.30	47	5/21/2025	TRIAL PREPARATION
HLL134A	6.00	\$126.61	\$759.66	47	6/3/2025	TRIAL PREPARATION
HLL134A	1.00	\$126.61	\$126.61	47	6/16/2025	TRIAL PREPARATION
HLL134A	1.00	\$126.61	\$126.61	47	6/27/2025	TRIAL PREPARATION
HLL134A	1.00	\$126.61	\$126.61	47	2/27/2025	TRIAL PREPARATION
HLL134A	4.60	\$126.61	\$582.41	47	2/28/2025	TRIAL PREPARATION
HLL134A	1.00	\$126.61	\$126.61	47	4/1/2025	TRIAL PREPARATION
HLL134A	0.80	\$126.61	\$101.29	47	4/10/2025	TRIAL PREPARATION
HLL134A	1.00	\$126.61	\$126.61	47	4/11/2025	TRIAL PREPARATION
HLL134A	0.50	\$126.61	\$63.30	47	4/18/2025	TRIAL PREPARATION
HLL134A	0.80	\$126.61	\$101.29	47	1/27/2025	TRIAL PREPARATION
HLL134A	0.80	\$126.61	\$101.29	47	1/28/2025	TRIAL PREPARATION
HLL134A	0.50	\$126.61	\$63.30	47	1/31/2025	TRIAL PREPARATION
HLL134A	1.50	\$126.61	\$189.92	47	2/11/2025	TRIAL PREPARATION
HLL134A	1.00	\$126.61	\$126.61	47	2/19/2025	TRIAL PREPARATION

Staff Code	Activity Hours	Staff Rate	Cost	Billing Code	Activity Date	Activity Description
HLL134A	2.10	\$126.61	\$265.88	47	2/24/2025	TRIAL PREPARATION
HLL134A	7.50	\$126.61	\$949.58	48	8/5/2025	FORMAL HEARING
HLL134A	0.20	\$126.61	\$25.32	49	9/4/2025	REVIEW TRANSCRIPTS AND PREPARE RECOMMENDED ORDER
HLL134A	4.40	\$126.61	\$557.08	49	9/10/2025	REVIEW TRANSCRIPTS AND PREPARE RECOMMENDED ORDER
HLL134A	3.00	\$126.61	\$379.83	49	9/11/2025	REVIEW TRANSCRIPTS AND PREPARE RECOMMENDED ORDER
HLL134A	1.00	\$126.61	\$126.61	49	9/17/2025	REVIEW TRANSCRIPTS AND PREPARE RECOMMENDED ORDER
HLL134A	7.00	\$126.61	\$886.27	58	12/9/2024	TRAVEL TIME
HLL134A	6.00	\$126.61	\$759.66	58	12/10/2024	TRAVEL TIME
HLL134A	0.50	\$126.61	\$63.30	63	8/26/2024	PRESENTATION OF CASES TO PROBABLE CAUSE PANEL
HLL134A	0.50	\$126.61	\$63.30	70	1/31/2024	CONFERENCES WITH LAWYERS
HLL134A	0.50	\$126.61	\$63.30	70	10/14/2024	CONFERENCES WITH LAWYERS
HLL134A	0.30	\$126.61	\$37.98	70	11/22/2024	CONFERENCES WITH LAWYERS
HLL134A	1.50	\$126.61	\$189.92	70	1/3/2025	CONFERENCES WITH LAWYERS
HLL134A	0.30	\$126.61	\$37.98	70	2/10/2025	CONFERENCES WITH LAWYERS
HLL134A	1.50	\$126.61	\$189.92	70	2/20/2025	CONFERENCES WITH LAWYERS
HLL134A	0.50	\$126.61	\$63.30	70	2/25/2025	CONFERENCES WITH LAWYERS
HLL134A	0.80	\$126.61	\$101.29	70	5/16/2025	CONFERENCES WITH LAWYERS
HLL134A	1.00	\$126.61	\$126.61	89	8/9/2024	PROBABLE CAUSE PREPARATION
HLL134A	0.50	\$126.61	\$63.30	89	8/21/2024	PROBABLE CAUSE PREPARATION
HLL134A	2.50	\$126.61	\$316.52	102	7/1/2024	REVIEW EXPERT WITNESS REPORT
HLL134A	0.50	\$126.61	\$63.30	103	2/8/2024	REVIEW SUPPLEMENTAL REPORT
HLL134A	0.50	\$126.61	\$63.30	103	3/28/2024	REVIEW SUPPLEMENTAL REPORT
HLL134A	0.70	\$126.61	\$88.63	113	1/19/2024	CONTACT WITH WITNESSES
HLL134A	0.30	\$126.61	\$37.98	113	1/23/2024	CONTACT WITH WITNESSES
HLL134A	0.50	\$126.61	\$63.30	113	1/26/2024	CONTACT WITH WITNESSES
HLL134A	0.30	\$126.61	\$37.98	113	2/19/2024	CONTACT WITH WITNESSES
HLL134A	0.50	\$126.61	\$63.30	113	3/7/2024	CONTACT WITH WITNESSES
HLL134A	0.50	\$126.61	\$63.30	113	3/11/2024	CONTACT WITH WITNESSES
HLL134A	0.60	\$126.61	\$75.97	113	3/14/2024	CONTACT WITH WITNESSES
HLL134A	0.50	\$126.61	\$63.30	113	3/15/2024	CONTACT WITH WITNESSES
HLL134A	1.30	\$126.61	\$164.59	113	5/19/2025	CONTACT WITH WITNESSES
HLL134A	1.50	\$126.61	\$189.92	113	5/27/2025	CONTACT WITH WITNESSES
HLL134A	3.50	\$126.61	\$443.14	113	7/17/2025	CONTACT WITH WITNESSES
HLL134A	0.30	\$126.61	\$37.98	114	6/10/2024	CONTACT WITH EXPERTS
HLL134A	0.50	\$126.61	\$63.30	114	6/13/2024	CONTACT WITH EXPERTS

Staff Code	Activity Hours	Staff Rate	Cost	Billing Code	Activity Date	Activity Description
HLL134A	0.90	\$126.61	\$113.95	114	2/21/2025	CONTACT WITH EXPERTS
HLL134A	2.50	\$126.61	\$316.52	114	7/30/2025	CONTACT WITH EXPERTS
HLL134A	0.50	\$126.61	\$63.30	115	12/4/2024	CONTACT WITH INVESTIGATORS
HLL134A	0.50	\$126.61	\$63.30	115	3/14/2025	CONTACT WITH INVESTIGATORS
Sub Total	184.60		\$23372.08			
Total	254.25		\$29958.18			

*****CONFIDENTIAL*****
Time Tracking System
Itemized Expense by Complaint
Complaint 202354547

Report Date:10/15/2025 2:48:41 PM

Staff Code	Expense Amount	Expense Code	Expense Date	Expense Code Description
PROSECUTION SERVICES UNIT(PSU)				
HLL134A	\$2500.00	131800	4/16/2024	EXPERT WITNESS FEES
HLL134A	\$686.40	131400	12/20/2024	COURT REPORTING
HLL134A	\$150.00	131400	3/11/2025	COURT REPORTING
HLL134A	\$2179.03	131400	9/18/2025	COURT REPORTING
HLL134A	\$7425.00	131800	9/25/2025	EXPERT WITNESS FEES
Sub Total	\$12940.43			
Total	\$12940.43			

**STATE OF FLORIDA
BOARD OF OSTEOPATHIC MEDICINE**

DEPARTMENT OF HEALTH,

Petitioner,

v.

Case No.: 2023-54547

HEIDI MARJANNA LAHTENMAA, D.O.,

Respondent.

_____ /

**AFFIDAVIT OF ATTORNEY IN SUPPORT OF
ASSESSMENT FOR COSTS**

Before me, the undersigned authority, personally appeared Michael Morris, who upon first being duly sworn on oath, deposes and says:

1. I am an attorney at law duly authorized to practice in the State of Florida and active in the practice of law in Florida since May 1996.

2. I worked as an attorney in the Prosecution Services Unit of the Department of Health for the State of Florida and, in that capacity, I prosecuted the above-captioned case. I am identified in documents which relate to the recording of my time by the code HLL134A.

3. I have reviewed the file in this case, including the Itemized Cost Report attached to Exhibit A of the Motion to Assess Costs in Accordance with Section 456.072(4), Florida Statutes.

4. Based upon the above, I have determined that the number of hours I expended in the prosecution of this case is recorded accurately, was incurred appropriately, and is reasonable for this type of case.

DATED this 15 day of October, 2025.

Michael Morris

Michael Morris, Esq.
Assistant General Counsel
DOH Prosecution Services Unit
4052 Bald Cypress Way, Bin C-65
Tallahassee, FL 32399-3265
Florida Bar Number: 0081493
(T) (850) 558-9868
(F) (850) 245-4662
Michael.Morris@flhealth.gov

**STATE OF FLORIDA
COUNTY OF LEON**

Before me, personally appeared Michael Morris, ☒ whose identity is personally known to me OR ☐ who produced _____ (type of identification), and who, under oath, acknowledges that his/her signature appears above.

Sworn to and subscribed before me this 15th day October, 2025.

Lynda Alyson Motes

Signature of Notary Public

Lynda Alyson Motes

Printed/Typed Name of Notary Public

(SEAL):



Lynda Alyson Motes
Comm.: HH 502460
Expires: Jun. 29, 2028
Notary Public - State of Florida

My Commission Expires: 6/29/28

STATE OF FLORIDA
DEPARTMENT OF HEALTH

DEPARTMENT OF HEALTH,

Petitioner,

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

v.

HEIDI M. LATEENMAA, D.O.,

Respondent.

_____ /

AFFIDAVIT OF OUTSIDE ATTORNEY REGARDING COSTS

Daniel R. Russell, being duly sworn on oath, deposes and says:

1. I am an attorney at law duly authorized to practice in the State of Florida and have been active in the practice of law in Florida since March 21, 2009. My Curriculum Vitae is attached as Exhibit 1 hereto.
2. I am personally familiar with the fees usually and customarily awarded to attorneys for legal services in administrative proceedings of the kind and nature of the captioned case.
3. I am familiar with Rule 4-1.5(b) of the Rules Regulating the Florida Bar, and have taken such into consideration in forming my opinion in this matter, the factors set forth therein for the determination of reasonable attorney's fees.

4. I am also familiar with, and have considered in forming my opinion in this matter, the Florida Supreme Court in the case of *Florida Patient's Compensation Fund vs. Rowe*, 472 So.2d 1145 (Fla. 1985) relating to the determination of reasonable attorney's fees.

5. I have reviewed the file of the Department of Health (the Department) in relation to this case.

6. I have reviewed the Department's "Time Tracking System Itemized Cost by Complaint" for the case referenced herein, which is among the attachments to the Motion to Assess Costs. I have only reviewed and analyzed the time entries for the Prosecution Services Unit.

7. Based on my review of these documents, it is my understanding that the Department is seeking to recover a total of \$36,312.51 (\$23,372.08 for attorney time and an additional \$12,940.43 for costs) for its attorney time and other costs related to the prosecution of this case.

8. Based on the above, and on my years in legal practice and my experience in this area of legal practice, it is my opinion that the hourly rates for the Department's prosecuting attorneys used in this case are within or below the reasonable and customary range for attorney time spent on cases of this type.

9. Based on the above, and on my years in legal practice and my experience in this area of legal practice, it is my opinion that the total number of attorney hours for which the Department of Health seeks recovery in this case is within the range of time customarily spent on cases of this type and is a reasonable total number of attorney hours for this case.

10. Based on the above, and on my years in legal practice and my experience in this area of legal practice, it is my opinion that the total amount of costs sought to be recovered for attorney time and other costs of prosecution in this case is a reasonable amount in a case of this type.

11. It is my understanding that the Department is moving to recover a total of \$36,312.51 in attorney time and costs in relation to this this case.

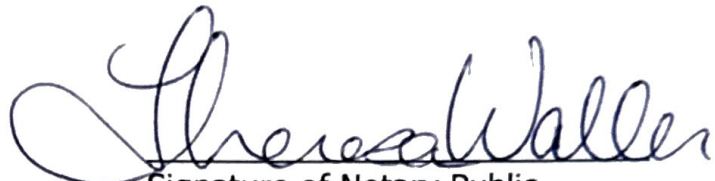
12. Based on the above, and on my years in legal practice and my experience in this area of legal practice, it is my opinion that items of expense are reasonable for a case of this type, and that the total amount of expenses sought to be recovered in this case is a reasonable amount for a case of this type.


Daniel R. Russell

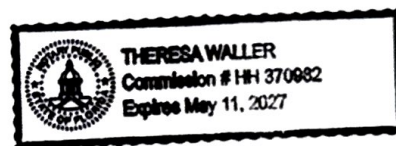
STATE OF FLORIDA
COUNTY OF LEON

Sworn to (or affirmed) and subscribed before me by means of
physical presence this 20th day of October, 2025, by Daniel R. Russell, who
is personally known to me.

(NOTARY SEAL)


Signature of Notary Public

Printed Name of Notary Public



Daniel R. Russell, Esq.
106 E. College Avenue, Suite 1200
Tallahassee, FL 32301 – drussell@joneswalker.com

Board Certified by the Florida Bar in State and Federal Government and Administrative Practice.

Jones Walker LLP, Partner

- Primary areas of practice focused on civil, administrative and federal litigation, government relations, healthcare regulation and gaming law.

Dean Mead, Shareholder

- Primary areas of practice focuses on civil and administrative litigation, government relations, healthcare regulation and gaming law.
- Recognized as a "Rising Star" by Florida Super Lawyers, 2019

State of Florida, Department of the Lottery, General Counsel

- Responsible for all legal and regulatory affairs of the Florida Lottery, which employed approximately 500 people and generated nearly \$5.5 billion in annual gross revenue.
- In accordance with the Department's emergency rulemaking authority, managed the drafting and publication of new rules for each lottery game, of which around six are published each month.
- Responsible for personally handling bid protests, administrative, state and federal litigation, and all other legal matters for the Department.
- Spearheaded the Department's "Retailer Integrity Program" and supervised ten sworn law enforcement officers.

Gulfstream Park Racing & Casino, General Counsel

- Responsible for the legal, compliance, regulatory and risk management operations at Gulfstream's horse racing, cardroom and slot machine facility. Part of a management team that oversaw a \$20 million revenue growth over two years.
- Managed more than 100 pieces of active litigation and the distribution of an annual political and government affairs budget of approximately \$200,000.
- Advised Gulfstream through a year-long bankruptcy proceeding and worked with multiple vendors, including independent contractors, on matters of contract re-negotiations and collections.
- Completed collective bargaining agreements with Gulfstream's two active unions.
- Managed workers' compensation claims and day-to-day labor relations issues for more than 800 employees.

Pennington, Moore, Wilkinson, Bell & Dunbar, Associate

- Primary areas of practice included gaming and pari-mutuel law, real estate, and employment law.
- Gaming practice included regulatory representation of multiple slot machine manufacturers and a Florida-based pari-mutuel facility with horse racing, slot machine and cardroom operations before the Florida Department of Business and Professional Regulation (DBPR) and Florida Legislature.