

**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.

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**MOTION FOR SANCTIONS AGAINST THE FLORIDA
DEPARTMENT OF HEALTH FOR FAILURE TO PROVIDE
PUBLIC RECORDS AND VIOLATION OF DUE PROCESS**

I, Heidi Marjaana Lahtenmaa, D.O., appearing pro se from Lisbon, Portugal, move for sanctions against the Florida Department of Health (DOH) for its willful failure to provide public records, including the “entire investigative file” and exemption log for Case Nos. 2023-54547 and 24-004162PL in violation of Chapter 119, Florida Statutes, and due process under § 120.57, Florida Statutes. The DOH’s non-compliance hinders my preparation for the virtual August 5–6, 2025 hearing, suggests bad faith, and supports my claims of government retaliation for my January 2023 Teladoc whistleblower disclosure on mafia/cybergang infiltration, likely involving Dr. Robert Dahlin and federal agencies (e.g., FBI). Pursuant to Rule 28-106.206, F.A.C., and § 120.569(2)(c), F.S., I request immediate relief as outlined below.

FACTUAL BACKGROUND

1. I am an osteopathic physician (License No. OS 16911) residing in Lisbon, Portugal. The DOH initiated Case Nos. 2023-54547 and 24-004162PL, alleging “delusions” based on my reports of cybergang hacking following my January 2023 Teladoc whistleblower disclosure. The Department of Health’s settlement proposes an indefinite suspension, Physicians Recovery Network (PRN) evaluations, and \$25,491.42 in costs, shifting from permanent

revocation. These penalties are disproportionate, as they are typically reserved for severe cases such as felony convictions, sexual misconduct, or gross malpractice causing patient harm. This proposal is particularly egregious, as no evidence has been provided to demonstrate specific symptoms, their impact on my ability to practice, or the affected job functions (§ 456.076, F.S.).”

2. On July 3, 2025, I submitted a public records request to the DOH Public Records Coordinator (PublicRecordsRequest@flhealth.gov, Reference No: P137244-070325) and e-filed with the Agency Clerk (Reference No: L137263-070425) under § 119.07, F.S., requesting by July 8, 2025:

- A written explanation of the DOH’s legal definition or interpretation of the terms “entire investigative file” and “complete investigative file” as used in DOH correspondence and in the context of investigations conducted under § 456.073, Florida Statutes.
- Clarification on whether any materials in the investigative file are being withheld due to an ongoing criminal investigation (e.g., under § 119.071(2)(c), Florida Statutes) or other statutory exemptions (e.g., protected health information under § 456.057, F.S., or confidential informant details).
- 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.
- Immediate release of any non-exempt portions of withheld documents (e.g., redacted versions) in electronic format to [REDACTED]@com and by certified mail to my mailing address below.
- Confirmation of whether the investigation associated with this case is active or closed, as this may affect the scope of the “entire investigative file.”
- Notification of any costs associated with this request in advance, as required by § 119.07(4), Florida Statutes.

3. The DOH failed to respond by July 8, 2025, violating § 119.07(1)(c), F.S., which requires a timely response, and § 456.073(4), F.S., mandating access to the “complete case.” Prior requests were also ignored, suggesting bad faith or a cover-up.

4. The DOH’s non-compliance prevents me from accessing critical evidence, such as Dr. Dahlin’s allegations, Probable Cause Panel findings, and others hindering my preparation for the August 5–6, 2025 virtual hearing. This violates my due process rights under § 120.57, F.S.

5. I suspect government retaliation, involving Dr. Dahlin and federal agencies (e.g., FBI), due to my Teladoc disclosure. This is supported by, but not limited to, the DOH's disproportionate penalties, non-compliance with public records laws, and interference with my legal representation, including sabotaged efforts by my former attorney, Stephen Burch whose public website pinged back child porn. I was fired for pointing this out to him. Additionally, I have evidence of innumerable interceptions with attorneys showing a clear years long pattern of disrupted communications. To name a few during May 5, 2025 consult with Jason D. Winn, there was a phone line/system outage. Shockingly, after the outage Jason Winn demanded my return to the United States "for IOP or you will not get your license back", based on insufficient and cursory chart review, completed in just a few minutes, and not listening to my account. Additionally, on June 25, 2025, Neil Bryan Tygar, referred by The Florida Bar, provided me with evasive responses for a simple question, of whether a physician eval can be done online. He demanded \$1,250 for this limited one question review. He indirectly encouraged me to return to the U. S. for a physician eval, that are commonly done online.

LEGAL BASIS

1. Violation of Public Records Law: The DOH's failure to provide non-exempt public records or an exemption log violates § 119.07(1)(c) and § 119.07(1)(d), F.S., which require timely responses and detailed logs for withheld documents.
2. Due Process Violation: By withholding the "complete investigative file," the DOH violates § 456.073(4), F.S., and § 120.57, F.S., denying me a fair hearing by impeding access to evidence needed for my defense.
3. Bad Faith and Retaliation: The DOH's actions, including, but not limited to, baseless allegations of "delusions" without evidence of impairment (§ 456.076, F.S.), excessive costs (\$25,491.42), and non-compliance suggest retaliation for my whistleblower disclosure, violating § 112.3187, F.S.
4. Authority for Sanctions: Rule 28-106.206, F.A.C., and § 120.569(2)(c), F.S., authorize the ALJ to impose sanctions for non-compliance with public records obligations, including compelling production, dismissing allegations, or granting other relief.

REQUEST FOR RELIEF

I respectfully request the following:

1. An order compelling the DOH to produce, by July 14, 2025, the “entire investigative file” for Case Nos. 2023-54547 and 24-004162PL including:

- A written explanation of the DOH’s legal definition or interpretation of the terms “entire investigative file” and “complete investigative file” as used in DOH correspondence and in the context of investigations conducted under § 456.073, Florida Statutes.
- Clarification on whether any materials in the investigative file are being withheld due to an ongoing criminal investigation (e.g., under § 119.071(2)(c), Florida Statutes) or other statutory exemptions (e.g., protected health information under § 456.057, F.S., or confidential informant details).
- 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.
- Immediate release of any non-exempt portions of withheld documents (e.g., redacted versions) in electronic format to [REDACTED] and by certified mail to my mailing address below.
- Confirmation of whether the investigation associated with this case is active or closed, as this may affect the scope of the “entire investigative file.”
- Notification of any costs associated with this request in advance, as required by § 119.07(4), Florida Statutes.

2. Dismissal of the DOH’s allegations in Case Nos. 2023-54547 and 24-004162PL for bad faith conduct, including failure to provide evidence and public records, violating § 120.57, F.S., and § 112.3187, F.S.

3. A continuance of the August 5–6, 2025 hearing, if necessary, to allow me to review produced records and secure new counsel, given prior inadequate representation by Stephen Burch and my location in Portugal.

4. An order requiring the DOH to explain, in writing, its failure to comply with § 119.07, F.S., and any involvement of third parties (e.g., Dr. Dahlin, federal agencies) in withholding records.

5. Any further relief the ALJ deems just, including costs for this motion, per § 120.569(2)(c), F.S.

Respectfully submitted,



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



Date: July 09, 2025

CERTIFICATE OF SERVICE:

I certify that a copy of this motion was filed electronically with DOAH via the eALJ portal on July 9, 2025, and furnished to Michael Morris, DOH counsel, at Michael.Morris@flhealth.gov and the Public Records Coordinator at PublicRecordsRequest@flhealth.gov on July 9, 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.