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Prosecuting attorney for the Idaho Board of Medicine

BEFORE THE IDAHO STATE BOARD OF MEDICINE

STATE OF IDAHO

In the Matter of the License of: ALEX BRENT WILLS, MD License No. M-12500, Respondent.	Case No. 1842591 **EMERGENCY ORDER OF IMMEDIATE SUSPENSION**

This matter having come before the Idaho State Board of Medicine ("Board") as an emergency proceeding pursuant to Idaho Code § 54-1806A of the Idaho Medical Practice Act and Idaho Code § 67-5247 of the Idaho Administrative Procedures Act; Idaho Code § 67-2604(1)(h) of the laws governing the Department of Self-Governing Agencies; the Board's licensing statutes set forth at Title 54, Chapter 18, Idaho Code, and the Board's rules, promulgated at IDAPA 24.33.01, *et seq.*; the Board finds and orders as follows:

FINDINGS OF FACT

1. The Board regulates the practice of medicine in the State of Idaho in accordance with Title 54, Chapter 18, Idaho Code.

2. The Board issued License No. M-12500 to Respondent to practice medicine as a physician in the state of Idaho. (Declaration of Frutoso Gonzalez, ¶ 3, Ex. BOM-1.)

3. Respondent's continued right to licensure is subject to the Board's laws, codified in Title 54, Chapter 18, Idaho Code, commonly known as the Idaho Medical Practice Act ("IMPA"), and the Board's Administrative Rules promulgated thereunder at IDAPA 24.33.01 *et seq.*

4. At times relevant hereto, Respondent owned and practiced at PERMA Mental Health, LLC, located at 950 W Bannock Street, Suite 1100, Boise, Idaho. Respondent offered psychiatric health care in person and through virtual care. (Gonzalez Decl., ¶ 4, Ex. BOM-2.)

5. PERMA Mental Health had multiple locations in Idaho, and Respondent employed other licensed mental health care providers, including, at times relevant hereto, licensed Advanced Practice Registered Nurses (Nurse Practitioners) and a licensed Physician Assistant. (*Id.* at ¶ 5.)

6. As of the date of this Order, Respondent is no longer practicing at the Bannock Street location, and based on information and belief, Respondent has no permanent residence. (*Id.* at ¶¶ 6-8.)

7. Respondent has been arrested and criminally charged with a felony for allegedly making aggressive physical contact with a female patient and committing forcible penetration by use of a foreign object against the patient's will.

8. On September 30, 2025, the Ada County Prosecutor charged Respondent with one felony count of forcible penetration by use of a foreign object in violation of Idaho Code § 18-6604 in State v. Wills, Fourth Judicial District for Ada County, Case No. CR01-25-36163. The Complaint is attached hereto and incorporated into this Order as Exhibit BOM-1.

9. On or about August 29, 2025, Respondent saw a patient ("Patient 1") for an in-person visit. During that visit, Respondent provided his personal contact information to Patient 1.

(Declaration of Frutoso Gonzlez, ¶ 12.) Patient 1 and Respondent then saw each other that night, during which encounter Respondent engaged in the alleged criminal conduct. (*Id.*)

10. Specifically, Respondent is alleged to have engaged in conduct constituting forcible penetration by use of a foreign object as described in BOM-1. Forcible penetration is characterized under Idaho law as a sex crime. Idaho Code § 18-6604.

11. Respondent was arraigned on October 1, 2025, and the Court set bail at $500,000 and ordered a competency evaluation pursuant to Idaho Code §§ 18-211, 18-212. (Ex. BOM-2, pp.1-2.)

12. Respondent also has a separate pending criminal case in Ada County in State v. Wills, Fourth Judicial District for Ada County, Case No. CR01-24-34185, in which he is charged with two misdemeanors related to a domestic violence incident on October 5, 2024 (hereinafter the "2024 criminal case"). A competency evaluation was also ordered in the 2024 criminal case. (Ex. BOM-3, pp. 3-4.) .

13. On September 26, 2025, Respondent's legal counsel in the 2024 criminal case filed a motion to withdraw as counsel of record, citing that counsel was unable to keep in contact with Respondent, Respondent was unavailable, Respondent's counsel was unaware of Respondent's location, and Respondent was not willing to listen to any advice given by his counsel. The Motion to Withdraw that was filed in the 2024 criminal case as shown in BOM-3, pp. 6-7.

14. All proceedings in Respondent's criminal proceedings have been suspended pending the court-ordered competency evaluation. (BOM-2, p.1; BOM-3, p. 3.).

15. On or about September 11, 2025, Respondent saw another female patient ("Patient 2") for her regularly scheduled appointment over a virtual care platform to review and refill her psychiatric medications. (Gonzalez Decl., ¶¶ 13-14.)

16. During this appointment, Respondent asked Patient 2 to meet him after hours through the virtual platform or at a restaurant or bar and pressed Patient 2 for information about her job and job location. Patient 2 declined to meet with Respondent. At the conclusion of the appointment, Respondent blew a kiss to Patient 2 and used a term of endearment, but Respondent expressly disavowed that he was trying to be sexual with Patient 2. Patient 2 felt that Respondent was making advances of a romantic or sexual nature toward her. (*Id.* at ¶ 14.)

17. Respondent only refilled one of Patient 2's psychiatric medications at that appointment, and Patient 2 was unaware that Respondent did not refill her prescription until she tried to get her refill. Patient 2 was unable to get in touch with Respondent or the clinic when she called about her prescriptions. (*Id.* at ¶ 15.)

18. A Complaint is being issued by the Executive Officer of the Board simultaneously with this Order to commence a formal contested case proceeding under the Idaho Administrative Procedure Act, Chapter 52, Title 67.

CONCLUSIONS OF LAW

Based upon the foregoing findings of fact, the Board hereby reaches the following conclusions of law:

19. The Board regulates the practice of medicine in the State of Idaho in accordance with the Idaho Medical Practice Act ("Act"), Title 54, Chapter 18, Idaho Code, and the Board's rules promulgated at IDAPA 24.33.01, *et seq.*

20. In enacting the Act, the legislature stated that "the practice of medicine is a privilege granted by the state of Idaho and is not a natural right of individuals, the purpose of [the Act] is to assure the public health, safety and welfare in the state by the licensure and regulation of physicians." I.C. § 54-1802.

21. To this end, the Board is vested with the power under Idaho Code § 54-1806A(10) to "temporarily suspend or restrict the license of any physician or physician assistant" when it finds that the licensee:

> [I]s causing great harm to the public or to any patient or group of patients, or is imminently likely to cause such harm, for which reason he or she and his or her license to practice medicine should be immediately suspended or restricted or he or she should be specially controlled, suspended in or restricted from the practice of medicine.

22. Similarly, the Idaho Administrative Procedures Act authorizes the Board to "act through an emergency proceeding in a situation involving an immediate danger to the public health, safety, or welfare requiring immediate agency action." I.C. § 6-5247(1).

23. In addition to the foregoing powers and duties, the Administrator of the Division of Occupational and Professional Licenses may act on behalf of the Board to, among other things, appoint hearing officers, administer oaths, depose witnesses, issue subpoenas, compel the attendance of witnesses, assess civil penalties, make investigations, and take other necessary actions. I.C. § 67-2604(1).

24. Under the IMPA and the Board's Administrative Rules, the Board may exercise its disciplinary authority against licensees who, among other things, engage in any conduct that constitutes an abuse or exploitation of a patient arising out of the trust and confidence placed in the physician by the patient. I.C. § 54-1814(22).

25. Conduct that constitutes an abuse or exploitation of a patient arising out of the trust and confidence placed in the physician by the patient includes, but is not limited to, the commission of any act of sexual contact, misconduct, exploitation, or intercourse with a patient or client or former patient or client or related to the licensee's practice. IDAPA 24.33.01.300.04.c.

26. The Court records attached and incorporated as Exhibits BOM 1-3 are documents of which the Board can take judicial notice in an administrative proceeding pursuant to Idaho Code § 67-5251(7)(a) and Idaho Code § 9-101(3) and the Board grants the prosecutor's request to take official notice of the court documents in Exhibits BOM-1, BOM-2, and BOM-3.

27. The Declaration of Frutoso Gonzalez to the Board is submitted under the penalty of perjury. It sets forth information based on direct testimony of witnesses who have personal knowledge and is supported by circumstantial guarantees of trustworthiness. Therefore, the Declaration and the information therein are considered reliable proof and can be relied upon for purposes of this emergency proceeding.

28. The foregoing findings constitute grounds for the Board to act in an emergency proceeding against Respondent's license. Specifically, the nature and severity of the criminal charges levied against Respondent, the factual support for the charge, that Respondent's behaviors were targeted toward female patients, the trust and confidence patients place in physicians, particularly involving the psychiatric relationship, the transitory nature of his practice and residence, and the potential for Respondent to abuse or exploit his patients demonstrate that Respondent presents an immediate and ongoing danger to the public health, safety and welfare.

29. To prevent or avoid the immediate danger that Respondent presents to the health, safety, and welfare of the public as a practicing physician, an immediate suspension of Respondent's license is necessary.

EMERGENCY ORDER

Now, therefore, based upon the foregoing findings of fact and conclusions of law, and good cause being shown, the Petition for Emergency Suspension is GRANTED and it is hereby ordered as follows:

Respondent's license to practice as a physician, License No M-12500, is hereby suspended effective immediately. Respondent's license shall remain suspended until the Board issues an order upon a petition by Respondent under Idaho Code § 54-1806A(10) or the completion of relevant proceedings in this matter pursuant to Idaho Code §§ 54-1806A(10), 67-5247(4).

DATED 10-8-2025

IDAHO STATE BOARD OF MEDICINE

By: [redacted]
Guillermo Guzman MD (10/08/2025 20:08:22 MDT)
Chair

CERTIFICATE OF SERVICE

I hereby certify that on the 9TH day of OCTOBER, 2025, I caused to be served, by the method(s) indicated, a true and correct copy of the foregoing upon:

Alexander Brent Wills
[redacted]
Respondent

- ✓ U.S. Mail
- ___ Certified Mail, Return Receipt Requested
- ___ Fax Transmission
- ✓ Email: [redacted]
- ___ Hand Delivered

John E. Sutton
Attorneys at Law
P. O. Box 799
Boise, ID 83701
Attorney for Respondent

- ✓ U.S. Mail
- ___ Certified Mail, Return Receipt Requested
- ___ Fax Transmission
- ✓ Email: [redacted]
- ___ Hand Delivered

Joan E. Callahan
Nelson | Williams
999 W. Main St., Suite 500
Boise, ID 83702
Board Prosecutor

- ___ U.S. Mail
- ___ Hand Delivered
- ✓ Email: [redacted]

[redacted]
Administrative Staff
Division of Occupational and Professional Licenses

Joan E. Callahan [ISB No. 9241]
Nelson | Williams, P.C.
999 W. Main St., Suite 500
Boise, ID 83702
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joan@nelsonwilliamslaw.com

Prosecuting Attorney for the Board of Medicine

BEFORE THE BOARD OF MEDICINE

STATE OF IDAHO

In the Matter of the License of: ALEX WILLS, MD License No. M-12500, Respondent.	Case No. 1842591 **COMPLAINT**

To: **Alexander Brent Wills** [redacted]

John E. Sutton
Attorneys at Law
P. O. Box 799
Boise, ID 83701
[redacted]

1. The Idaho Board of Medicine ("Board") is empowered to regulate the practice of medicine in Idaho in accordance with Title 54, Chapter 18, Idaho Code, commonly known as the Idaho Medical Practice Act ("IMPA"); and the Board's rules promulgated at IDAPA 24.33.03 *et seq*. ("Board Rules").

2. The Board issued Respondent License No. M-12500 to practice medicine in the State of Idaho as a physician. Respondent's license is subject to the provisions of the IMPA and Board Rules.

BACKGROUND

5. At all times relevant hereto, Respondent practiced medicine as a psychiatrist and utilized both in-person and virtual care formats.

6. At times relevant hereto, Respondent owned and practiced at PERMA Mental Health, LLC, located at 950 W Bannock Street, Suite 1100, Boise, Idaho.

7. PERMA Mental Health ("PERMA") had multiple locations in Idaho, and Respondent employed other licensed mental health care providers, including, at times relevant hereto, licensed Advanced Practice Registered Nurses (Nurse Practitioners) and a licensed Physician Assistant.

8. PERMA ceased operations unexpectedly without notice to patients in approximately mid-September 2025.

9. On September 30, 2025, the Ada County Prosecutor charged Respondent with one felony count of forcible penetration by use of a foreign object in violation of Idaho Code § 18-6604 in State v. Wills, Fourth Judicial District for Ada County, Case No. CR01-25-36163.

10. The alleged victim in that case was Respondent's patient.

11. On or about August 29, 2025, Respondent saw a patient ("Patient 1") for an in-person visit. During that visit, Respondent provided his personal contact information to Patient 1.

12. Later that same day, after business hours, Respondent picked up Patient 1 for a social purpose. Patient 1 believed they were going to a restaurant or bar. Instead, Respondent took Patient 1 to a hotel room where he was living.

13. Respondent then allegedly made aggressive physical contact with Patient 1 and committed forcible penetration by use of a foreign object against Patient 1's will.

14. On September 30, 2025, the Ada County Prosecutor charged Respondent with one felony count of forcible penetration by use of a foreign object in violation of Idaho Code § 18-6604 in State v. Wills, Fourth Judicial District for Ada County, Case No. CR01-25-36163.

15. On or about September 11, 2025, Respondent saw another female patient ("Patient 2") for her regularly scheduled appointment over a virtual care platform to review and refill her psychiatric medications.

16. During this appointment, Respondent asked Patient 2 to meet him after hours through the virtual platform or at a restaurant or bar and pressed Patient 2 for information about her job and job location. Patient 2 declined to meet with Respondent. At the conclusion of the appointment, Respondent blew a kiss to Patient 2 and used a term of endearment, but Respondent expressly disavowed that he was trying to be sexual with Patient 2. Patient 2 felt that Respondent was making advances of a romantic or sexual nature toward her.

17. Respondent only refilled one of Patient 2's psychiatric medications at that appointment, and Patient 2 was unaware that Respondent did not refill her prescription until she tried to get her refill. Patient 2 was unable to contact Respondent or the clinic when she called about her prescriptions.

COUNT I
Abuse or Exploitation of a Patient

18. All facts set forth in this Stipulation are incorporated into Count I.

19. Respondent engaged in the abuse or exploitation of a patient arising out of the trust and confidence placed in the physician by the patient when Respondent picked up Patient 1, took her to his hotel room, and engaged in acts of sexual misconduct and contact with Patient 1.

20. The allegations set forth in Count I constitute violations of the following law and rule governing the practice of a physician in the State of Idaho and grounds for disciplinary action

against Respondent's license: I.C. § 54-1814(22) (abuse or exploitation of a client or patient); IDAPA 24.33.01.300.04.c. (prohibiting sexual contact or misconduct with a client or patient).

COUNT II
Unprofessional Conduct

21. All facts set forth in this Stipulation are incorporated into Count II.

22. Respondent engaged in a pattern of unprofessional behavior and interactions by using his therapeutic appointments and relationship to engage in or attempt to engage in personal and after-hours meetings with Patient 1 and Patient 2, which interfered and could reasonably be expected to adversely impact the quality of care rendered to them.

23. The allegations set forth in Count II constitute violations of the following law and rule governing the practice of a physician in the State of Idaho and grounds for disciplinary action against Respondent's license: I.C. § 54-1814(26) (pattern of unprofessional or disruptive behavior or interaction in a health care setting).

WHEREFORE, the Board's Executive Officer requests that the Idaho Board of Medicine, following an evidentiary hearing, enter a final order imposing the following discipline against Respondent's license:

1. Respondent shall be ordered to cease from violating the Board's laws and rules.
2. Respondent shall be appropriately disciplined, which may include, among other things, the revocation or suspension of Respondent's license.
3. Respondent shall be ordered to pay a civil fine of up to $10,000.00 per violation unless otherwise provided by statute or rule.
4. Respondent shall be ordered to pay the Board's costs, expenses, and fees in investigating and prosecuting this matter, including, without limitation, attorney fees and costs. I.C. §§ 67-2604(1), 67-2604(4), and 12-117(5).

5. Respondent shall be subject to such other and further relief as the Board deems just and proper under the circumstances.

DATED this 8th day of October, 2025.

IDAHO BOARD OF MEDICINE

By [redacted]
Nicki Chopski
Executive Officer
Health Professions Bureau

NOTIFICATION AND PROCEDURAL RIGHTS

If you wish to contest the charges set forth in this Complaint, you must: file with the Board a written Answer to the allegations and charges within twenty-one (21) days of the date of mailing of this Complaint (or as otherwise served in accordance with IDAPA 62.01.01); and request an evidentiary hearing on the charges. An Answer must admit or deny each material allegation set forth in this Complaint and should fully state all defenses. If you fail to file an Answer, request a hearing, or fail to appear at any stage of a contested case, the Board may move for default against you and be granted the relief sought in this Complaint.

A copy of the Answer must be filed with the Board and the Board's prosecuting attorney at the following addresses:

Idaho Board of Medicine
P.O. Box 83720
Boise, ID 83720-0063
Telephone: (208) 334-3233

Joan E. Callahan
NELSON | WILLIAMS
999 W. Main Street, Ste. 500
Boise, ID 83702
Telephone: (208) 383-9511

Upon receipt of your Answer and request for a hearing, this matter will be reviewed and scheduled for a hearing before the Board, a Board-appointed hearing officer, or the Office of Administrative Hearings. You will be notified of the time, date, and place of the hearing, the name of the hearing officer, and further notification of your procedural rights and responsibilities. You have the right to be represented by legal counsel, at your own expense, during this administrative proceeding.

Copies of the Administrative Procedure Act (Title 67, Chapter 52, Idaho Code) and the Idaho Rules of Administrative Procedure (IDAPA 62.01.01) may be obtained online, the Idaho State Law Library, and at many county law libraries.

CERTIFICATE OF SERVICE

I hereby certify that on the 8TH day of OCTOBER, 20 25, I caused to be served, by the method(s) indicated, a true and correct copy of the foregoing upon:

Alexander Brent Wills
[redacted]
Respondent

- ✓ U.S. Mail
- ___ Certified Mail, Return Receipt Requested
- ___ Fax Transmission
- ✓ Email: [redacted]
- ___ Hand Delivered

John E. Sutton
Attorneys at Law
P. O. Box 799
Boise, ID 83701
Attorney for Respondent

- ✓ U.S. Mail
- ___ Certified Mail, Return Receipt Requested
- ___ Fax Transmission
- ✓ Email: [redacted]
- ___ Hand Delivered

Joan E. Callahan
Nelson | Williams
999 W. Main St., Suite 500
Boise, ID 83702
Board Prosecutor

- ___ U.S. Mail
- ___ Hand Delivered
- ✓ Email: [redacted]

[redacted]
Administrative Staff
Division of Occupational and Professional Licenses