STATE OFFICE OF ADMINISTRATIVE HEARINGS RECEIVED ON 2/6/2026 1:06 PM

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STATE OFFICE OF
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Amy Robles, CLERK

SOAH DOCKET NO503-26-12000

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2/6/2026 1:10:11 pm
STATE OFFICE OF
ADMINISTRATIVE HEARINGS
Amy Robles, CLERK

HEARING CONDUCTED BY THE
TEXAS STATE OFFICE OF ADMINISTRATIVE HEARINGS
SOAH DOCKET NO. 503-26._____.MD
TEXAS MEDICAL LICENSE NO. P8566

IN THE MATTER OF THE	BEFORE THE STATE OFFICE
COMPLAINT AGAINST	OF
DANIEL WILLIAMS, MD	ADMINISTRATIVE HEARINGS

COMPLAINT

TO THE HONORABLE TEXAS MEDICAL BOARD AND THE HONORABLE ADMINISTRATIVE LAW JUDGE TO BE ASSIGNED:

The Staff of the Texas Medical Board (Board Staff) files this Complaint against Daniel Williams, MD (Respondent) for alleged violations of the Medical Practice Act (Act), Texas Occupations Code Title 3, Subtitle B, and the Board's Rules, Texas Administrative Code Title 22, Part 9, and would respectfully show the following:

I. SUMMARY OF ALLEGATIONS

On August 12, 2024, Respondent was subject to disciplinary action by peers when his clinical privileges were revoked at his place of employment. Additionally, Respondent failed to respond to the Board's requests for information.

II. LEGAL AUTHORITY AND JURISDICTION

1. Respondent is a Texas Physician and holds Texas Medical License No. P8566, originally issued on December 6, 2013. Respondent's license was in full force and effect at all times material and relevant to this Complaint.

2. Respondent received notice of one or more Informal Settlement Conferences (ISC). The Board complied with all procedural rules including, but not limited to, Board Rules 182 and 179, as applicable.

3. No agreement to settle this matter has been reached by the parties.

4. All jurisdictional requirements have been satisfied.

5. The filing of this Complaint and the relief requested are necessary to protect the health and public interest of the citizens of the State of Texas.

III. APPLICABLE STATUTES AND STATUTORY VIOLATIONS

The following statutes, rules, and agency policy are applicable to the procedures for conduct of the hearing this matter:

A. General Statutes and Rules:

1. Section 164.007(a) of the Act requires that the Board adopt procedures governing formal disposition of a contested case before the State Office of Administrative Hearings.

2. 22 Texas Administrative Code, Chapter 179 sets forth the procedures adopted by the Board under the requirement of Section 164.007(a) of the Act.

3. 22 Texas Administrative Code, Chapter 180 sets forth aggravating factors that warrant more severe or restrictive action by the Board.

4. 1 Texas Administrative Code, Chapter 155 sets forth the rules of procedure adopted by SOAH for contested case proceedings.

5. 1 Texas Administrative Code, Chapter 155.507 requires the issuance of a Proposal for Decision (PFD) containing Findings of Fact and Conclusions of Law.

2. Section 164.007(a) of the Act and 22 Texas Administrative Code, Chapter 179 provide the Board with the sole and exclusive authority to determine the charges on the merits, to impose sanctions for violation of the Act or a Board rule, and to issue a Final Order.

B. Specific Violations Cited:

Respondent has violated the following provisions of the Act and Board Rules.

1. Section 159.002(a) of the Act authorizes the Board to take disciplinary action against Respondent for disclosure of confidential and privileged physician-patient communication relative to or in connection with any professional services as a physician to the patient.

2. Section 164.051(a)(1) of the Act authorizes the Board to take disciplinary action against Respondent based on Respondent's commission of an act prohibited under Section 164.052 of the Act.

3. Section 164.051(a)(3) of the Act authorizes the Board to take disciplinary action against Respondent based on violation of Board Rules: 165.1(a), failure to maintain an adequate, complete, and accurate medical record; 173.3(b), failure to maintain current profile information by submitting updates and corrections as changes occur; and 173.3(d), failure to report a change of address to the Board within 30 days after the change occurs.

4. Section 164.051(a)(6) of the Act authorizes the Board to take disciplinary action against Respondent based on Respondent's failure to practice medicine in an acceptable professional manner consistent with public health and welfare, as further defined by Board Rule 190.8(1)(C), failure to use proper diligence in one's professional practice.

5. Section 164.052(a)(5) of the Act authorizes the Board to take disciplinary action against Respondent based upon Respondent's unprofessional or dishonorable conduct that is likely to deceive or defraud the public, as provided by Section 164.053 of the Act, or injure the public, as further defined by Board Rules: 190.8(2)(B), failure to comply with Board request for information; 190.8(2)(D), failure to cooperate with Board staff; 190.8(2)(N), failing to maintain the confidentiality of a patient; and 190.8(2)(P), behaving in a disruptive manner towards licensees, hospital personnel, other medical personnel, patients, family members or others that interferes or could be reasonably expected to adversely impact the quality of care rendered to a patient.

6. Section 164.053(a)(1) of the Act authorizes the Board to take disciplinary action against Respondent based on Respondent committing an act that violates any state or federal law if the act is connected with the physician's practice of medicine, specifically the Health Insurance Portability and Accountability Act, 45 C.F.R. Parts 160-164 (HIPAA, Title II).

IV. FACTUAL ALLEGATIONS

Based on information and belief, Board Staff alleges:

1. On August 20, 2024, Respondent's clinical privileges were revoked effective August 12, 2024, based on increasing concerns about his behavior and stability. Specifically, his employer had concerns about the following behavior: patient and clinic abandonment without properly passing off duties; several internal and external complaints, working remotely despite having multiple patients on his schedule and CPAs with various nurse practitioners requiring his presence; poor communication and being unreachable by administration; and making accusations

that the CEO was poisoning the water supply at the clinic. Respondent's employer stated that the "lack of communication and disregard for continuity of patient care [was] not appropriate" and that Respondent "violated company policy and potentially placed patients in danger."

2. On December 9, 2024, Respondent submitted a response to the Board regarding the alleged violations of the Medical Practice Act.

3. On February 12, 2025, the Board sent a letter to Respondent notifying him of the scheduling of an Informal Settlement Conference ("ISC") on May 14, 2025 regarding the matter.

4. On March 25, 2025, the Board sent a letter to Respondent notifying him of the scheduled ISC and providing him with an ISC packet.

5. On April 2, 2025 and April 15, 2025, the Board sent follow-up letters to Respondent informing him the investigation of the allegations was ongoing.

6. On May 14, 2025, Respondent did not appear at the scheduled Informal Settlement Conference.

7. Since Respondent's response on December 9, 2024, Board attempts to contact Respondent have been unsuccessful.

8. Respondent's disciplinary action taken by his employer is a violation of the Act and Board Rules, specifically:

> Section 159.002(a) of the Act authorizes the Board to take disciplinary action against Respondent for disclosure of confidential and privileged physician-patient communication relative to or in connection with any professional services as a physician to the patient.
>
> Section 164.051(a)(1) of the Act authorizes the Board to take disciplinary action against Respondent based on Respondent's commission of an act prohibited under Section 164.052 of the Act.
>
> Section 164.051(a)(3) of the Act authorizes the Board to take disciplinary action against Respondent based on violation of Board Rule 165.1(a), failure to maintain an adequate, complete, and accurate medical record.
>
> Section 164.051(a)(6) of the Act authorizes the Board to take disciplinary action against Respondent based on Respondent's failure to practice medicine in an acceptable professional manner consistent with public health and welfare, as further defined by Board Rule 190.8(1)(C), failure to use proper diligence in one's professional practice.

Section 164.052(a)(5) of the Act authorizes the Board to take disciplinary action against Respondent based upon Respondent's unprofessional or dishonorable conduct that is likely to deceive or defraud the public, as provided by Section 164.053 of the Act, or injure the public, as further defined by Board Rules: 190.8(2)(N), failing to maintain the confidentiality of a patient; and 190.8(2)(P), behaving in a disruptive manner towards licensees, hospital personnel, other medical personnel, patients, family members or others that interferes or could be reasonably expected to adversely impact the quality of care rendered to a patient.

Section 164.053(a)(1) of the Act authorizes the Board to take disciplinary action against Respondent based on Respondent committing an act that violates any state or federal law if the act is connected with the physician's practice of medicine, specifically the Health Insurance Portability and Accountability Act, 45 C.F.R. Parts 160-164 (HIPAA, Title II).

Section 164.051(a)(3) of the Act authorizes the Board to take disciplinary action against Respondent based on violation of Board Rules: 173.3(b), failure to maintain current profile information by submitting updates and corrections as changes occur; and 173.3(d), failure to report a change of address to the Board within 30 days after the change occurs.

V. AGGRAVATING AND MITIGATING FACTORS

Board Rule 190.14 provides that the Board may impose more restrictive sanctions when there are multiple violations of the Act.

Board Rule 190.15 provides that the Board may consider aggravating factors that warrant more severe or restrictive disciplinary action. This case includes the following aggravating factors: (5) increased potential for harm to the public;[1] (7) intentional, premeditated, knowing, or grossly negligent act constituting a violation;[2] (9) previous disciplinary action by the Board, any government agency, peer review organization, or health care entity[3]; and (11) other relevant circumstances increasing the severity of the misconduct[4].

Board staff is not aware of any mitigating factors that apply and demands that Respondent submit proof to substantiate any alleged mitigating factors.

[1] Now codified at 22 Tex. Admin. Code § 180.5(b)(1)(E).
[2] Now codified at 22 Tex. Admin. Code § 180.5(b)(1)(G).
[3] Now codified at 22 Tex. Admin. Code § 180.5(b)(1)(I).
[4] Now codified at 22 Tex. Admin. Code § 180.5(b)(1)(K).

VI. NOTICE TO RESPONDENT

IF YOU DO NOT FILE A WRITTEN ANSWER TO THIS COMPLAINT WITH THE STATE OFFICE OF ADMINISTRATIVE HEARINGS WITHIN 20 DAYS AFTER THE DATE OF RECEIPT, A DEFAULT ORDER MAY BE ENTERED AGAINST YOU, WHICH MAY INCLUDE THE DENIAL OF LICENSURE OR ANY OR ALL OF THE REQUESTED SANCTIONS, INCLUDING THE REVOCATION OF YOUR LICENSE. A COPY OF ANY ANSWER YOU FILE WITH THE STATE OFFICE OF ADMINISTRATIVE HEARINGS SHALL ALSO BE PROVIDED TO THE HEARINGS COORDINATOR OF THE TEXAS MEDICAL BOARD.

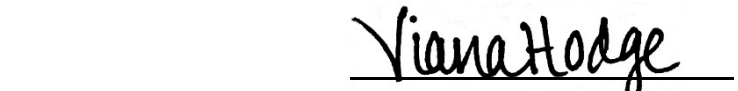
VII. PRAYER

Board Staff requests that an administrative law judge employed by the State Office of Administrative Hearings conduct a contested case hearing on the merits of the Complaint, and issue a Proposal for Decision containing Findings of Fact and Conclusions of Law necessary to support a determination that Respondent violated the Act and Board Rules, as set forth in this Complaint.

Respectfully submitted,

TEXAS MEDICAL BOARD

AMY SWANHOLM, JD, MSEL
Director of Litigation



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ATTORNEYS FOR BOARD

Filed with the Texas Medical Board on February 6th, 2026.

Stephen Brint Carlton, JD
Executive Director
Texas Medical Board

CERTIFICATE OF SERVICE

I certify that on February 6, 2026, a true and correct copy of the foregoing Complaint has been served as follows:

BY EFILE:
Docket Clerk
State Office of Administrative Hearings
William P. Clements Bldg.
300 W. 15th Street, Suite 504
Austin, Texas 78701-1649

BY CERTIFIED MAIL/RRR No. 9589 0710 5270 0402 8460 74 and FIRST-CLASS MAIL:
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PRO SE RESPONDENT

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Viana Hodge JD
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