

1 **BEFORE THE BOARD OF MEDICAL EXAMINERS**
2 **OF THE STATE OF NEVADA**

3 *****

4
5 **In the Matter of Charges and Complaint**

Case No. 20-303-1

6 **Against**

FILED

7 **JOSE RAMON TROCHE, PA,**

OCT 27 2020

8 **Respondent.**

**NEVADA STATE BOARD OF
MEDICAL EXAMINERS**
By: 

9
10 **COMPLAINT**

11 The Investigative Committee (IC)¹ of the Nevada State Board of Medical Examiners
12 (Board), by and through Aaron Bart Fricke, Esq., Senior Deputy General Counsel and attorney for
13 the IC, having a reasonable basis to believe that Jose Ramon Troche, PA (Respondent), violated the
14 provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC)
15 Chapter 630 (collectively, the Medical Practice Act), hereby issues its Complaint, stating the IC's
16 charges and allegations as follows:

17 1. Respondent was at all times relevant to this Complaint a licensed physician
18 assistant holding an active license to practice medicine in the State of Nevada (License No. 545).
19 Respondent was licensed by the Board on October 20, 1997.

20 2. Respondent engaged in an inappropriate personal relationship with Patient A, who
21 was a patient under Respondent's care. Patient A's name is not disclosed in this Complaint to
22 protect his or her identity, but his or her identity is disclosed in the Patient Designation
23 contemporaneously served on Respondent with a copy of this Complaint.

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27 ¹The Investigative Committee of the Nevada State Board of Medical Examiners, at the time this formal Complaint
28 was authorized for filing, was composed of Board members Mr. M. Neil Duxbury, Chairman, Aury Nagy, M.D., and
Michael C. Edwards, M.D., FACS.

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COUNT I

NRS 630.301(9) (Disreputable Conduct)

3. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.

4. NAC 630.380(1)(m) provides that violation of a provision of NRS 630.301 to 630.3065, inclusive, is grounds for initiating disciplinary action against a physician assistant.

5. NRS 630.301(9) provides that engaging in conduct that brings the medical profession into disrepute is grounds for or initiating disciplinary action or denying licensure.

6. Respondent's inappropriate personal relationship with Patient A, a patient under Respondent's care, is conduct that brings the medical profession into disrepute.

7. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

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WHEREFORE, the IC prays:

1. That the Board give Respondent notice of the charges herein against him and give him notice that he may file an answer to the Complaint herein as set forth in NRS 630.339(2) within twenty (20) days of service of the Complaint;
2. That the Board set a time and place for a formal hearing after holding an Early Case Conference pursuant to NRS 630.339(3);
3. That the Board determine what sanctions to impose if it finds and concludes that there has been a violation or violations of the Medical Practice Act committed by Respondent;
4. That the Board make, issue and serve on Respondent its findings of fact, conclusions of law and order, in writing, to include sanctions to be imposed; and
5. That the Board take such other and further action as may be just and proper in these premises.

DATED this 27 day of October, 2020.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 
Aaron Bart Fricke, Esq., Senior Deputy General Counsel
Attorney for the Investigative Committee

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VERIFICATION

STATE OF NEVADA)
 : ss.
COUNTY OF WASHOE)

Mr. M. Neil Duxbury, having been duly sworn, hereby deposes and states under penalty of perjury that he is the Chairman of the Investigative Committee of the Nevada State Board of Medical Examiners that authorized the Complaint against the Respondent herein; that he has read the foregoing Complaint; and that based upon information discovered in the course of the investigation into a complaint against Respondent, he believes that the allegations and charges in the foregoing Complaint against Respondent are true, accurate and correct.

DATED this 27th day of October, 2020.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: M. Neil Duxbury
M. Neil Duxbury, Chairman


CERTIFICATE OF SERVICE

I hereby certify that I am employed by the Nevada State Board of Medical Examiners and that on the 27th day of October, 2020, I served a file-stamped copy of the foregoing **COMPLAINT**, via U.S. Certified Mail to the following parties:

Alia A. Najjar, M.D., Esq.
c/o Jose Ramon Troche
Nutile Law
7395 S. Pecos Road, Ste. 103
Las Vegas, NV 89120
**Certified Mail Receipt No.:*

9171 9690 0935 0241 6169 51

DATED this 27th day of October, 2020.


Mercedes Fuentes, Legal Assistant
Nevada State Board of Medical Examiners

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