OF THE STATE OF NEVADA **** In the Matter of Charges and Complaint Against HANS-JORG WALTER ROSLER, M.D., Respondent. Case No. 19-26862-1 FILED SEP 2 2 2020 NEVADA STATE BOARD OF MEDICAL EXAMINERS By:

BEFORE THE BOARD OF MEDICAL EXAMINERS

The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners (Board), by and through Aaron Bart Fricke, Esq., Senior Deputy General Counsel and attorney for the IC, having a reasonable basis to believe that Hans-Jorg Walter Rosler, M.D. (Respondent) violated the provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630 (collectively, the Medical Practice Act), hereby issues its Second Amended Complaint (Complaint), stating the IC's charges and allegations as follows:

Respondent was at all times relevant to this Complaint a physician holding an
 active license to practice medicine in the State of Nevada (License No. 10364). His license was
 originally issued by the Board on November 26, 2002.

A. Respondent's Failure to Maintain Documentation of a Program of Supervision for a
 Physician Assistant

22 2. At all times relevant to this Complaint, Respondent supervised Steven Lee 23 Olenchak, PA-C (Olenchak), a physician assistant licensed by the Board, pursuant to a formal 24 notice of supervision provided to the Board in accord with NAC 630.360(4), wherein Respondent 25 certified that he had read and was aware of all provisions of NRS Chapter 630 and 26 NAC Chapter 630 concerning his duties as a physician supervising Olenchak.

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 ¹ The Investigative Committee (IC) of the Nevada State Board of Medical Examiners (Board), at the time this formal Second Amended Complaint 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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1	3.	Pursaunt to NAC 630.370(5), Respondent was required to develop and carry out a		
2	program to ensure the quality of care provided by Olenchak, and to maintain accurate records and			
3	documentation regarding his program of supervision of Olenchak.			
4	4.	Respondent failed to maintain accurate records and documentation regarding his		
5	program of su	upervision of Olenchak.		
6		<u>COUNT I</u>		
7	NRS 630.3065(2)(a) (Knowing Failure to Comply With A Regulation of the Board)			
8	5.	All of the allegations in the above paragraphs are hereby incorporated as if fully set	Į	
9	forth herein.			
10	6.	Pursuant to NRS 630.3065(2)(a), knowingly failing to comply with a regulation of		
11	the Board is grounds for initiating disciplinary action against a licensee.			
12	7.	As demonstrated by, but not limited to, the above-outlined facts, Respondent		
13	knowingly failed to comply with NAC 630.370(5).			
14	8.	By reason of the foregoing, Respondent is subject to discipline by the Board as		
15	provided in NRS 630.352.			
16	WHEREFORE, the Investigative Committee prays:			
17	1.	That the Board give Respondent notice of the charges herein and give notice that		
18	an answer to the Complaint herein may be filed as set forth in NRS 630.339(2) within twenty (20)			
19	days of servic	ce of the Complaint;		
20	2.	That the Board set a time and place for a formal hearing after holding an Early		
21	Case Confere	nce pursuant to NRS 630.339(3);		
22	3.	That the Board determine what sanctions to impose if it determines there has been		
23	a violation or	violations of the Medical Practice Act committed by Respondent;		
24	4.	That the Board make, issue and serve on Respondent its findings of fact,		
25	conclusions of law and order, in writing, that includes the sanctions imposed; and			
26	5.	That the Board take such other and further action as may be just and proper in these		
27	premises.			
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DATED this _____ day of September, 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

OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners 9600 Gateway Drive Reno, Nevada 89521 (775) 688-2559

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 **22** day of September, 2020.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

M. Neil Duxbury, Chairman

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	1	CERTIFICATE OF MAILING	
	2	I hereby certify that I am employed by Nevada State Board of Medical Examiners and that	
	3	on the 22 nd day of September, 2020, I served a filed copy of the SECOND AMENDED	
	4	COMPLAINT, via USPS e-certified, return receipt mail to the following:	
	5	HANS-JORG WALTER ROSLER, M.D.	
	6	c/o Danielle Woodrum, Esq. Lewis Brisbois Bigaard & Smith	
	7	6385 S. Rainbow Boulevard Las Vegas, NV 89118	
	8		
	9	Dated this 22 day of September, 2020.	
ISEL	10	18 Miles	
GENERAL COUNSEL rd of Medical Examiners ateway Drive Nevada 89521 8) 688-2559	11	Sheri L. Quigley, Legal Assistant	
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THE GENER ate Board of Medical 9600 Gateway Drive Reno, Nevada 8952 (775) 688-2559	14		
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