

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

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

3                                   \* \* \* \* \*

4  
5   **In the Matter of Charges and**  
6   **Complaint Against**  
7   **HANS-JORG WALTER ROSLER, M.D.,**  
8   **Respondent.**

Case No. 19-26862-1

**FILED**  
**SEP 22 2020**  
NEVADA STATE BOARD OF  
MEDICAL EXAMINERS  
By: \_\_\_\_\_

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10                                   **SECOND AMENDED COMPLAINT**

11           The Investigative Committee<sup>1</sup> (IC) 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 Hans-Jorg Walter Rosler, M.D. (Respondent)  
14 violated the provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative  
15 Code (NAC) Chapter 630 (collectively, the Medical Practice Act), hereby issues its Second  
16 Amended Complaint (Complaint), stating the IC's charges and allegations as follows:

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

20   **A.     Respondent's Failure to Maintain Documentation of a Program of Supervision for a**  
21   **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.


27           \_\_\_\_\_  
28           <sup>1</sup> 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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DATED this 22 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

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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 22<sup>nd</sup> day of September, 2020.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

M. NEIL DUXBURY  
M. Neil Duxbury, Chairman

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CERTIFICATE OF MAILING

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on the 22<sup>nd</sup> day of September, 2020, I served a filed copy of the SECOND AMENDED COMPLAINT, via USPS e-certified, return receipt mail to the following:

HANS-JORG WALTER ROSLER, M.D.  
c/o Danielle Woodrum, Esq.  
Lewis Brisbois Bigaard & Smith  
6385 S. Rainbow Boulevard  
Las Vegas, NV 89118

Dated this 22<sup>nd</sup> day of September, 2020.

Sheri L. Quigley  
Sheri L. Quigley, Legal Assistant