

BEFORE THE BOARD OF MEDICAL EXAMINERS
OF THE STATE OF NEVADA

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In the Matter of Charges and)
Complaint Against)
GARY G. GANSERT, M.D.,)
Respondent.)

Case No. 13-4774-1

FILED

JUN 25 2013

NEVADA STATE BOARD OF
MEDICAL EXAMINERS
By: 

COMPLAINT

The Investigative Committee (IC) of the Nevada State Board of Medical Examiners (Board), composed at the time of filing of Benjamin J. Rodriguez, M.D., Chairman, Beverly A. Neyland, M.D., Member, and Donna A. Ruthe, Member, by and through Erin L. Albright, Esq., General Counsel and attorney for the IC, having a reasonable basis to believe that Gary G. Gansert, 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 formal Complaint, stating the IC's charges and allegations as follows:

1. Respondent is currently licensed in active status (License No. 3204), and has been so licensed by the Board since September 12, 1976, pursuant to the provisions of the Medical Practice Act.

2. Patient A was a thirty-nine (39)-year-old female at the time of the incident in question. Her true identity is not disclosed in this Complaint to protect her identity, but her identity is disclosed in the Patient Designation served on Respondent contemporaneously with a copy of this Complaint.

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1 3. On or about August 30, 2010, Patient A presented to the emergency department at
2 Renown Regional Medical Center (Renown) complaining of diarrhea, nausea and vomiting. A
3 urinalysis was performed on Patient A. A different physician diagnosed Patient A with diarrhea
4 and vomiting. Patient A received a liter of normal saline bolus, Zofran and morphine and was
5 discharged.

6 4. On or about August 31, 2010, approximately seven (7) hours after her discharge
7 from Renown on August 30, 2010, Patient A returned to the emergency department at Renown
8 complaining of recent-onset right lower extremity pain. During this visit, Patient A was treated by
9 Respondent. During this visit, Respondent conducted a full-range of motion on Patient A's right
10 lower extremity and noted the patient's right lower extremity was not swollen or tender.
11 Respondent performed motor and sensory exams on Patient A. The results of these exams were
12 normal and symmetrical.

13 5. During this visit, Patient A was hypotensive and her heart rate was mildly
14 tachycardic. Respondent ordered and obtained lab work that showed multiple abnormalities,
15 including, but not limited to, a diminished platelet count of forty-eight (48); forty-eight percent
16 (48%) bands with moderate toxic granulation and few Dohle bodies; eighteen percent (18%)
17 metamyelocytes; elevated creatinine; decreased electrolytes; elevated liver transaminases and
18 elevated total bilirubin. After reviewing the results of the lab work, Respondent advised Patient A
19 to stop drinking alcohol, provided her with a prescription for Percodan and discharged the patient
20 home.

21 6. Approximately fifteen (15) hours after Respondent discharged Patient A from the
22 hospital, Patient A returned to the emergency department at Renown. At this time, Patient A had
23 developed leukopenia with evidence of multi-organ dysfunction and coagulopathy. Patient A was
24 subsequently diagnosed with streptococcal toxic shock syndrome secondary to a retained tampon.

25 7. Further, Respondent's medical records for Patient A are inaccurate, incomplete,
26 illegible and/or untimely. For example, Patient A's medical records lack documentation
27 demonstrating that Respondent reviewed Patient A's medical records from her August 30, 2010
28 emergency room visit.


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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 the sanctions it will impose if it finds Respondent violated the Medical Practice Act;
4. That the Board make, issue and serve on Respondent, in writing, its findings of fact, conclusions of law and order, which shall include the sanctions imposed; and
5. That the Board take such other and further action as may be just and proper in these premises.

DATED this 25th day of June, 2013.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS


By: 
Erin L. Albright, Esq.
General Counsel
Attorney for the Investigative Committee

VERIFICATION

1 STATE OF NEVADA)
2 : ss.
3 COUNTY OF CLARK)

4 Benjamin J. Rodriguez, M.D., hereby deposes and states under penalty of perjury under
5 the laws of the state of Nevada that he is the Chairman of the Investigative Committee of the
6 Nevada State Board of Medical Examiners that authorized the foregoing Complaint against the
7 Respondent herein; that he has read the foregoing Complaint; and that based upon information
8 discovered during the course of the investigation into a complaint against Respondent, he believes
9 the allegations and charges in the foregoing Complaint against Respondent are true, accurate and
10 correct.

11 Dated this 25th day of June, 2013.

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14 Benjamin J. Rodriguez, M.D.

OFFICE OF THE GENERAL COUNSEL
Nevada State Board of Medical Examiners
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Reno, Nevada 89502
(775) 688-2559


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CERTIFICATE OF SERVICE

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 26th day of June 2013; I served a filed copy of the COMPLAINT, PATIENT DESIGNATION & FINGERPRINT INFORMATION, via USPS e-certified return receipt mail to the following:

Gary G. Gansert, M.D.
832 Willow St.
Reno, NV 89502

Dated this 26th, day of June 2013.



Angelia L. Donohoe
Legal Assistant