

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. 24-38040-1

6   **Against:**

7   **NATALIE SANDRA GOULD, M.D.,**

8   **Respondent.**

**FILED**

**MAR - 6 2024**

**NEVADA STATE BOARD OF  
MEDICAL EXAMINERS**

By: \_\_\_\_\_

9  
10                                   **COMPLAINT**

11           The Investigative Committee<sup>1</sup> (IC) of the Nevada State Board of Medical Examiners  
12 (Board), by and through William P. Shogren, Deputy General Counsel and attorney for the IC,  
13 having a reasonable basis to believe that Natalie Sandra Gould, M.D. (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 relative to this Complaint a medical doctor holding an  
18 active license to practice medicine in the State of Nevada (License No. 13673). Respondent was  
19 originally licensed by the Board on August 12, 2010.

20           2.       Patient A<sup>2</sup> was a forty-seven (47) year-old female at the time of the events at issue.

21           3.       On February 6, 2017, Patient A was admitted to the hospital for a diagnostic  
22 laparoscopy and pelvic mass removal.

23           4.       Respondent performed the procedure on February 6, 2017. Respondent's  
24 preoperative outpatient consultation acknowledged complex disease involving a pelvic mass and  
25 extensive adhesions.

26  
27           <sup>1</sup> The Investigative Committee of the Nevada State Board of Medical Examiners, at the time this formal  
28 Complaint was authorized for filing, was composed of Board members Victor M. Muro, M.D., Chowdhury H. Ahsan,  
M.D., Ph.D., FACC, and Ms. Pamela Beal.

<sup>2</sup> Patient A's true identity is not disclosed herein to protect her privacy but is disclosed in the Patient  
Designation served upon Respondent along with a copy of this Complaint.

1           5.       The procedure was converted to an exploratory laparotomy with lysis of adhesions,  
2 resection of Patient A's rectosigmoid, primary re-anastomosis, and resection of the pelvic mass,  
3 due to the extensive nature of the adhesive disease that was found during the procedure. During  
4 the procedure, a side-to-side anastomosis was created.

5           6.       Respondent's operative notes for the procedure did not indicate how the  
6 anastomosis was created or how any anastomotic leak testing was performed.

7           7.       Despite Patient A's complex disease involving a known pelvic mass and extensive  
8 adhesions, Respondent did not consult with a general or colorectal surgeon either preoperatively  
9 or intraoperatively.

10          8.       As a result of the procedure, Patient A suffered an anastomotic leak.

11          9.       On February 7, 2017. Patient A was noted to have nausea, vomiting, a fever,  
12 abdominal distension and pain. On February 9, 2017, Patient A was noted to have distention,  
13 vomiting, low white blood cell count (leukocytosis), and a fever.

14          10.      On February 11, 2017, Patient A had a concerning drop in white blood cell count,  
15 from leukocytosis to leukopenia, indicating possible sepsis. That same day, a supine abdominal  
16 x-ray was obtained, showing the possible presence of air in Patient A's abdominal cavity  
17 (pneumoperitoneum).

18          11.      The same day, the radiologist who reviewed the x-ray noted "diffuse central  
19 lucency that could represent pneumoperitoneum." The radiologist recommended further  
20 evaluation with either upright or decubitus film.

21          12.      On February 11, 2017, Respondent did not order an upright abdominal x-ray or CT  
22 of the abdomen and pelvis, despite Patient A's concerning drop in white blood cell count.

23          13.      On February 11, 2017, Respondent's notes did not indicate the possibility of an  
24 anastomotic leak.

25          14.      On February 12, 2017, Patient A's sepsis progressed to shock, deoxygenation, and  
26 admission to the intensive care unit. On that date, Patient A's pre-operative diagnosis listed free  
27 air intraperitoneal and perforated viscus. An exploratory surgery was performed, demonstrating  
28 an anastomotic leak and feculent peritonitis.





1 **WHEREFORE**, the Investigative Committee prays:

2 1. That the Board give Respondent notice of the charges herein against her and give  
3 notice that she may file an answer to the Complaint herein as set forth in NRS 630.339(2) within  
4 twenty (20) days of service of the Complaint;

5 2. That the Board set a time and place for a formal hearing after holding an Early  
6 Case Conference pursuant to NRS 630.339(3);

7 3. That the Board determine what sanctions to impose if it determines there has been  
8 a violation or violations of the Medical Practice Act committed by Respondent;

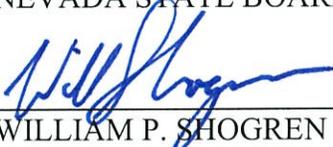
9 4. That the Board award fees and costs for the investigation and prosecution of this  
10 case as outlined in NRS 622.400;

11 5. That the Board make, issue and serve on Respondent its findings of fact,  
12 conclusions of law and order, in writing, that includes the sanctions imposed; and

13 6. That the Board take such other and further action as may be just and proper in these  
14 premises.

15 DATED this 6<sup>th</sup> day of March, 2024.

16 INVESTIGATIVE COMMITTEE OF THE  
17 NEVADA STATE BOARD OF MEDICAL EXAMINERS

18 By: 

19 WILLIAM P. SHOGREN

20 Deputy General Counsel

21 9600 Gateway Drive

22 Reno, NV 89521

23 Tel: (775) 688-2559

24 Email: [shogrenw@medboard.nv.gov](mailto:shogrenw@medboard.nv.gov)

25 *Attorney for the Investigative Committee*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

VERIFICATION

STATE OF NEVADA            )  
  : ss.  
COUNTY OF CLARK         )

          Chowdhury H. Ahsan, M.D., Ph.D., FACC, 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 6<sup>th</sup> day of March, 2024.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

  
\_\_\_\_\_  
CHOWDHURY H. AHSAN, M.D., PH.D., FACC  
*Chairman of the Investigative Committee*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

I hereby certify that I am employed by the Nevada State Board of Medical Examiners and that on the 6th day of March, 2024, I served a file-stamped copy of the foregoing **COMPLAINT** as well as the **PATIENT DESIGNATION** via USPS Certified Mail, postage pre-paid, to the following parties:

NATALIE SANDRA GOULD, M.D.  
700 Shadow Lane, #370  
Las Vegas, NV 89106

Tracking No.: 9171 9690 0935 0241 6241 23

DATED this 6<sup>th</sup> day of March, 2024.

  
\_\_\_\_\_  
MERCEDES FUENTES  
Legal Assistant  
Nevada State Board of Medical Examiners