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

BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

* * * * *

In the Matter of Charges and Complaint Against: **MEREDITH ANNE HEBERER, M.D.,** **Respondent.**	**Case No. 26-53974-1**

FILED
OCT 16 2026
NEVADA STATE BOARD OF MEDICAL EXAMINERS
By:

COMPLAINT

The Investigative Committee[1] (IC) of the Nevada State Board of Medical Examiners (Board), by and through Ian J. Cumings, Senior Deputy General Counsel and attorney for the IC, having a reasonable basis to believe that Meredith Anne Heberer, 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 Complaint, stating the IC's charges and allegations as follows:

1. Respondent was at all times relative to this Complaint a medical doctor holding an active license to practice medicine in the State of Nevada (License No. 20580). Respondent was originally licensed by the Board on November 20, 2020.

2. Patient A[2] was a forty-eight (48) year-old female at the time of the events at issue.

3. On April 8, 2025, Patient A was admitted to the hospital for diabetic ketoacidosis, and had complaints of abdominal pain, nausea, and vomiting for the previous three (3) days.

4. A computed tomography (CT) scan was obtained, which revealed partial small bowel obstruction. An abdominal exam performed by medical personnel demonstrated diffuse tenderness.

/ / /

[1] The Investigative Committee of the Nevada State Board of Medical Examiners, at the time this formal Complaint was authorized for filing, was composed of Board members Chowdhury H. Ahsan, M.D., Ph.D., FACC, Ms. Pamela J. Beal, Apeksha Desai, M.D., MBA.

[2] 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.

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

5. Patient A was admitted to the intensive care unit (ICU) to manage her diabetic ketoacidosis, and general surgery was consulted regarding the small bowel obstruction.

6. On April 9, 2025, Patient A's condition significantly deteriorated. Patient A developed tachycardia, hypotension, and demonstrated an increased respiratory rate. Patient A was placed on vasopressors and given aggressive fluid resuscitation. Respondent was contacted by critical care staff for a surgical consultation.

7. ICU staff documented a concerning abdominal exam, and Patient A exhibited rising lactic acid levels and worsening ketoacidosis despite her treatment. ICU staff noted a high suspicion for possible ischemic bowel injury or bowel perforation.

8. Respondent saw Patient A on April 9, 2025, following a request from ICU staff. Despite Patient A's significant deterioration including worsening heart rate, blood pressure, respiratory rate and serum lactate, Respondent did not take Patient A to the operating room for an exploratory laparotomy. Further, Respondent failed to document any clinical evaluation, medical record, or clinical rationale for her decision of withholding surgical intervention. Instead, Respondent instead departed the hospital for the evening.

9. During the evening of April 9, 2025, Patient A's condition continued to rapidly decline, and she was documented as having profound hypotension.

10. On the morning of April 10, 2025, after reviewing Patient A's medical records, Respondent took Patient A to the operating room for an exploratory laparotomy. Patient A was found to have necrosis of the right colon and ileum which required resection and removal of blood clots from the patient's mesenteric artery.

11. Patient A continued to deteriorate, experiencing multisystem organ failure and ultimately passed away on April 14, 2025.

COUNT I

NRS 630.301(4) - Malpractice

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

///

13. NRS 630.301(4) provides that malpractice of a physician is grounds for initiating disciplinary action against a licensee.

14. NAC 630.040 defines malpractice as "the failure of a physician, in treating a patient, to use the reasonable care, skill, or knowledge ordinarily used under similar circumstances."

15. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient A by failing to surgically intervene on April 9, 2025, despite Patient A's clear clinical indication for surgery.

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

WHEREFORE, the Investigative Committee prays:

1. That the Board give Respondent notice of the charges herein against her and give her notice that she 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 determines there has been a violation or violations of the Medical Practice Act committed by Respondent;

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

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

///

///

///

///

///

///

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

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

DATED this 16th day of October, 2026.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: _____

IAN J. CUMINGS
Senior Deputy General Counsel
9600 Gateway Drive
Reno, NV 89521
Tel: (775) 688-2559
Email: icumings@medboard.nv.gov
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

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 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 ___ day of October, 2026.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: _____
CHOWDHURY H. AHSAN, M.D., PH.D., FACC
Chairman of the Investigative Committee