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

* * * * *

In The Matter of Charges and)
)
Complaint Against)
)
KORD THOMAS STREBEL, M.D.,)
)
Respondent.)

Case No. 11-30344-1

FILED

MAY - 4 2011

NEVADA STATE BOARD OF
MEDICAL EXAMINERS

By: *[Signature]*

COMPLAINT

The Investigative Committee of the Nevada State Board of Medical Examiners, composed at the time filing of Charles N. Held, M.D., Chairman, Theodore B. Berndt, M.D., Member, and Valerie J. Clark, Member, having a reasonable basis to believe that Kord Thomas Strebel, M.D., hereinafter referred to as Respondent, has violated the provisions of NRS Chapter 630, hereby issues its formal Complaint, stating the Investigative Committee's charges and allegations, as follows:

1. Respondent's license is currently in active status (License No. 11468), and has been so licensed since July 1, 2005 by the Nevada State Board of Medical Examiners pursuant to the provisions of Chapter 630 of the Nevada Revised Statutes.

2. Patient A was a thirty-five year old (35) female at the time of the incidents in question. Her true identity is not disclosed to protect her privacy, but her identity is disclosed in the Patient Designation served on Respondent along with a copy of this Complaint.

3. On June 17, 2010, Patient A presented to Respondent seeking a procedure for permanent birth control. Respondent performed an examination of Patient A, and a vaginal medicinal insert was prescribed.

4. Patient A was instructed to insert the medication on the night of June 24, 2010 and return to Respondent the next day, on June 25, 2010. She did so and subsequently presented to

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1 Respondent on June 25, 2010 with 1.4 cm. of fetal tissue discharge. Upon immediate examination,
2 Patient A spontaneously passed the remaining products of conception.

3 5. Unfortunately, a pregnancy test was not administered to Patient A on June 24, 2010
4 immediately preceding the insertion of the medication. Further, the medical records are in conflict
5 on the actual administration of pregnancy tests to Patient A. It is not clear if pregnancy tests were
6 administered to Patient A on June 17, 2010 or June 25, 2010, or both dates.

7 **Count I**

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

10 7. Nevada Administrative Code Section 630.040 defines malpractice as the failure of a
11 physician, in treating a patient, to use the reasonable care, skill, or knowledge ordinarily used under
12 similar circumstances.

13 8. Nevada Revised Statute Section 630.301(4) provides that malpractice is grounds for
14 initiating disciplinary action against a licensee.

15 9. Respondent failed to use the reasonable care, skill, or knowledge ordinarily used
16 under the same or similar circumstances by, among other things, when he failed and omitted to
17 administer a pregnancy test on Patient A immediately preceding the insertion of the medication on
18 June 24, 2010 by Patient A.

19 10. By reason of the foregoing, Respondent is subject to discipline by the Nevada State
20 Board of Medical Examiners as provided in Section 630.352 of the Nevada Revised Statutes.

21 **Count II**

22 11. All of the allegations in the above paragraphs are hereby incorporated as if fully set
23 forth herein.

24 12. Nevada Revised Statute Section 630.3062(1) provides that the failure to maintain
25 timely, legible, accurate and complete medical records relating to the diagnosis, treatment and care
26 of a patient is grounds for initiating discipline against a licensee.

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1 13. Respondent failed to ensure that Patient A's pregnancy tests were correctly and timely
2 recorded in the medical records. It is difficult to determine, or accurately identify when, if ever, a
3 pregnancy test was administered to Patient A prior to the June 25, 2010 appointment.

4 14. By reason of the foregoing, Respondent is subject to discipline by the Nevada State
5 Board of Medical Examiners as provided in Section 630.352 of the Nevada Revised Statutes.

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

7 1. That the Nevada State Board of Medical Examiners give Respondent notice of the
8 charges herein against him and give him notice that he may file an answer to the Complaint herein
9 as set forth in Section 630.339 of the Nevada Revised Statutes within twenty (20) days of service of
10 the Complaint.

11 2. That the Nevada State Board of Medical Examiners set a time and place for a formal
12 hearing after holding an Early Case Conference pursuant to NRS 630.339(3);

13 3. That the Nevada State Board of Medical Examiners determine what sanctions it
14 determines to impose if it determines there has been a violation or violations of the Medical Practice
15 Act (Nevada Revised Statutes Chapter 630) committed by Respondent; and

16 4. That the Nevada State Board of Medical Examiners make, issue and serve on
17 Respondent its findings of facts, conclusions of law and order, in writing, that includes the sanctions
18 imposed; and

19 5. That the Nevada State Board of Medical Examiners take such other and further action
20 as may be just and proper in these premises.

21 DATED this 4th day of May, 2011.

22
23 THE INVESTIGATIVE COMMITTEE OF THE
24 NEVADA STATE BOARD OF MEDICAL EXAMINERS

25 By:



26 Bradley O. Van Ry, Esq.
27 Attorney for the Investigative Committee
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VERIFICATION

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STATE OF NEVADA)
 : ss.
COUNTY OF DOUGLAS)

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

Dated this 4th day of May, 2011.



CHARLES N. HELD, M.D.

OFFICE OF THE GENERAL COUNSEL

Nevada State Board of Medical Examiners

1105 Terminal Way #301

Reno, Nevada 89502


(775) 688-2559

CERTIFICATE OF MAILING

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 5th day of May 2011, I served a file copy of the COMPLAINT, PATIENT DESIGNATION & Fingerprint Information, by mailing via USPS certified return receipt mail to the following:

Kord Strebel, M.D.
1950 Pinto Ln.
Las Vegas, NV 89106

Dated this 5th day of May 2011.



Angelia L. Donohoe
Legal Assistant