OF THE STATE OF NEVADA

* * * * *

In the Matter of Charges and Complaint

Case No. 21-25351-1

Against:

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KRISTIN ADELE HESTDALEN, M.D.,
Respondent.

FEB 1 2 2021

NEVADA STATE BOARD OF MEDICAL EXAMINERS

COMPLAINT

The Investigative Committee (IC)¹ of the Nevada State Board of Medical Examiners (Board), by and through Aaron Bart Fricke, Esq., Senior Deputy General Counsel and attorney for the IC, having a reasonable basis to believe that Kristin Adele Hestdalen, M.D., (Respondent), violated the provisions of Nevada Revised Statutes (NRS) Chapter 630 and the Nevada Administrative Code (NAC) Chapter 630 (collectively Medical Practice Act), hereby issues its Complaint (Complaint), stating the IC's charges and allegations as follows:

- 1. Respondent was at all times relative to this Complaint a licensed medical doctor holding an active license to practice medicine in the State of Nevada (License No. 10215). Respondent was originally licensed by the Board on July 1, 2002.
- 2. At all times relevant to this Complaint, Respondent held either an active or expired Nevada Controlled Substance Registration, Certificate No. CS I 1061, issued by the Nevada State Board of Pharmacy (Pharmacy Board).
- 3. Respondent failed to timely renew her Certificate of Registration No. CS 11061, issued by the Pharmacy Board, which expired on October 31, 2018.
- 4. Respondent wrote two hundred sixty-three (263) prescriptions for controlled substances between November 1, 2018 and May 3, 2019.

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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 Victor M. Muro, M.D., Chair, Ms. April Mastroluca, and Weldon Havins, M.D., J.D.

5. The Pharmacy Board approved a renewed Controlled Substance Registration	fo
Respondent on December 4, 2019, at which time Respondent appeared before the Pharm	ac
Board to answer questions and give testimony regarding her application and the facts	ano
circumstances the foregoing.	

6. Pursuant to a Stipulation and Order entered into between the Respondent and the Pharmacy Board on June 10, 2020, Respondent admitted to and was disciplined by the Pharmacy Board for violation of NRS 453.226(1), NRS 453.321(1)(a), NRS 639.100(1) and NRS 639.2813(1), whereby she received a letter of reprimand from the Pharmacy Board, and was ordered to pay a fine of five thousand dollars (\$5,000.00), among other conditions of disciplinary action.

COUNT I

NRS 630.306(1)(b)(3)

(Violation of Statutes and Regulations of the Nevada State Board of Pharmacy)

- 7. All of the allegations contained in Paragraphs 1-6 above are hereby incorporated by reference as though fully set forth herein.
- 8. Respondent is a practitioner as defined by NRS 639.0125(1), as a physician, who holds a license to practice medicine in the State of Nevada.
- 9. NRS 630.306(1)(b)(3) provides that engaging in conduct that violates a provision of chapter 639 of NRS, or a regulation adopted by the State Board of Pharmacy pursuant thereto, that is applicable to a licensee who is a practitioner, as defined in NRS 639.0125, is grounds for initiating discipline against a licensee.
 - 10. Respondent violated NRS 639.100(1) and NRS 639.2813(1).
- 11. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

WHEREFORE, the IC 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;

OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners 9600 Gateway Drive Reno, Nevada 89521

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- 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 finds and concludes that there has been a violation or violations of the Medical Practice Act committed by Respondent;
- 4. That the Board make, issue and serve on Respondent its findings of fact, conclusions of law and order, in writing, to include sanctions to be imposed; and
- 5. That the Board take such other and further action as may be just and proper in these premises.

Dated this 21 day of FEBWAY, 2021.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

Aaron Bart Fricke, Esq., Senior Deputy General Counsel Attorney for the Investigative Committee

OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners

VERIFICATION

STATE OF NEVADA)
	: SS
COUNTY OF CLARK)

Victor M. Muro, M.D., 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 12th day of February, 2021.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

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Victor M. Muro, M.D., Chairman

OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners

Nevada State Board of Medical Examiners 9600 Gateway Drive Reno, Nevada 89521 (775) 688-2559

CERTIFICATE OF SERVICE

I hereby certify that I am employed by the Nevada State Board of Medical Examiners and that on the 12th day of February, 2020, I served a file-stamped copy of the **COMPLAINT**, via U.S. Certified Mail and electronic mail to the following:

Lyn E. Beggs, Esq. Law Offices Of Lyn E. Beggs, PLLC c/o Kristin Adele Hestdalen, M.D. 316 California Ave., #863 Reno, NV 89509 lyn@lbeggslaw.com

*Certified Mailing No.:

9171 9690 0935 0243 8327 00

DATED this _____day of February, 2021.

Mercedes Fuentes, Legal Assistant Nevada State Board of Medical Examiners