


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

3 * * * * *

4 **In the Matter of Charges and Complaint** **Case No. 21-25351-1**
5 **Against:**
6 **KRISTIN ADELE HESTDALEN, M.D.,**
7 **Respondent.**

FILED
FEB 12 2021
NEVADA STATE BOARD OF
MEDICAL EXAMINERS
By: 

8
9 **COMPLAINT**

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

16 1. Respondent was at all times relative to this Complaint a licensed medical doctor
17 holding an active license to practice medicine in the State of Nevada (License No. 10215).
18 Respondent was originally licensed by the Board on July 1, 2002.

19 2. At all times relevant to this Complaint, Respondent held either an active or expired
20 Nevada Controlled Substance Registration, Certificate No. CS I 1061, issued by the Nevada State
21 Board of Pharmacy (Pharmacy Board).

22 3. Respondent failed to timely renew her Certificate of Registration No. CS 11061,
23 issued by the Pharmacy Board, which expired on October 31, 2018.

24 4. Respondent wrote two hundred sixty-three (263) prescriptions for controlled
25 substances between November 1, 2018 and May 3, 2019.

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28 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.

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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



By: _____
Victor M. Muro, M.D., Chairman

OFFICE OF THE GENERAL COUNSEL
Nevada State Board of Medical Examiners
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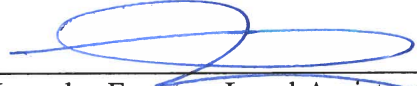
CERTIFICATE OF SERVICE

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 12th day of February, 2021.


Mercedes Fuentes, Legal Assistant
Nevada State Board of Medical Examiners