

BEFORE THE BOARD OF MEDICAL EXAMINERS
OF THE STATE OF NEVADA

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In the Matter of Charges and Complaint

Case No. 21-25351-1

Against:

KRISTIN ADELE HESTDALEN, M.D.,

Respondent.

FILED

FEB 12 2021

NEVADA STATE BOARD OF
MEDICAL EXAMINERS

By: _____

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.

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.

NRS 630.306(1)(b)(3)

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.

8 9. NRS 630.306(1)(b)(3) provides that engaging in conduct that violates a provision
9 of chapter 639 of NRS, or a regulation adopted by the State Board of Pharmacy pursuant thereto,
10 that is applicable to a licensee who is a practitioner, as defined in NRS 639.0125, is grounds for
11 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.

5 || **WHEREFORE**, the IC prays:

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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 FEBRUARY, 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

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

CERTIFICATE OF SERVICE

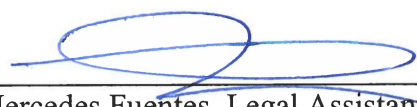
I hereby certify that I am employed by the Nevada State Board of Medical Examiners and that on the 12th day of February, 2020, I served a file-stamped copy of the **COMPLAINT**, via U.S. Certified Mail and electronic mail to the following:

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