

BEFORE THE BOARD OF MEDICAL EXAMINERS
OF THE STATE OF NEVADA

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In the Matter of Charges and)
Complaint Against)
TREVOR A. SCHMIDT, PA-C,)
Respondent.)

Case No. 17-36566-1

FILED

FEB - 3 2017

NEVADA STATE BOARD OF
MEDICAL EXAMINERS

By: 

COMPLAINT

The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners (Board), having a reasonable basis to believe that Trevor A. Schmidt, PA-C (Respondent), has violated the provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630 (collectively, the Medical Practice Act), hereby issues this Complaint, stating the IC's charges and allegations as follows:

A. Respondent's Medical License

1. Respondent is currently licensed as a certified Physician Assistant (PA-C) in active status (License No. PA1219), and has been so licensed by the Board since May 12, 2010, pursuant to the provisions of the Medical Practice Act.

2. On September 11, 2002, Respondent was certified as a PA-C.

B. Respondent's Supervising Physician

3. Pursuant to NAC 630.360, a physician assistant is authorized to perform the medical services that are within the scope of practice of his supervising physician.

4. On December 29, 2014, Karen F. Arcotta, M.D. (NV License No. 4896), signed an agreement to become Respondent's supervising physician. Dr. Arcotta had a sub-specialty (cardiovascular disease) certification that expired on December 31, 2003. She was also Board

¹ The Investigative Committee of the Nevada State Board of Medical Examiners, at the time of filing this Complaint, was composed of Wayne Hardwick, M.D., Theodore B. Berndt, M.D., and Mr. M. Neil Duxbury.

1 certified (internal medicine) from September 14, 1983 through January 24, 2012. She became
2 physically incapacitated due to complications from a total hip replacement on January 12, 2015.

3 5. Dr. Arcotta did not have any documented training in cosmetic and liposuction
4 procedures from December 29, 2014 through January 30, 2015, the latter of which was the
5 effective date of the Notice of Termination of Supervising/Collaboration Agreement between
6 Respondent and Dr. Arcotta.

7 **C. Respondent's Practice**

8 6. At all times alleged herein, Respondent was the owner of MyShape Lipo.

9 7. At specific times alleged herein, Respondent was practicing medicine at MyShape
10 Lipo under the supervision of Dr. Arcotta.

11 8. While practicing medicine at MyShape Lipo, Respondent performed the following
12 procedures at high volumes: tumescent liposuction, aesthetic procedures and/or fat injection
13 procedures.

14 **D. Respondent's Patient Care**

15 9. To protect the privacy of Patients A through H referenced herein, their true
16 identities are not disclosed; however, their identities are disclosed in the Patient Designation
17 served on Respondent contemporaneously with a copy of this Complaint.

18 **Patient A**

19 10. On January 12, 2015, Patient A presented to Respondent at MyShape Lipo to be
20 evaluated for liposuction.

21 11. On January 12, 2015, Patient A's medical chart lacks documentation of the units of
22 aspirate on the operative report, and is important to note how much was removed due to or
23 relating to high-volume fluid shifts and its associated risks during the liposuction procedure.

24 **Patient B**

25 12. On January 12, 2015, Patient B presented to Respondent at MyShape Lipo to be
26 evaluated for liposuction.

27 13. On January 12, 2015, Patient B's medical chart lacks documentation of any
28 preoperative antibiotics, the Patient's blood pressure or pulse during the liposuction procedure

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Patient C

14. On January 12, 2015, Patient C presented to Respondent at MyShape Lipo to be evaluated for liposuction.

15. On January 12, 2015, Patient C's medical chart lacks documentation regarding blood pressure or pulse during the liposuction procedure.

Patient D

16. On January 13, 2015, Patient D presented to Respondent at MyShape Lipo to be evaluated for liposuction.

17. On January 13, 2015, Patient D was in a hypertensive condition, even after receiving Atenolol (200mg) approximately 14 minutes prior to the liposuction procedure. Patient D's blood pressure remained at 169/73 after the procedure, and Patient D was subsequently discharged.

18. Patients D's medical chart does not indicate on the discharge note that Patient D's blood pressure turned to normal limits and pulses were intact.

19. On January 14, 2015, Patient D informed Respondent that there was extensive bruising after the procedure. Respondent's failure to monitor such condition of hypertension increased the risk of hematoma development in Patient D.

Patient E

20. On January 13, 2015, Patient E presented to Respondent at MyShape Lipo to be evaluated for liposuction.

21. On January 13, 2015, Patient E's medical chart lacks documentation of the blood pressure or pulse during the liposuction procedure.

Patient F

22. On January 13, 2015, Patient F presented to Respondent at MyShape Lipo to be evaluated for liposuction.

23. On January 13, 2015, Patient F's medical chart lacks documentation of blood pressure or pulse during the liposuction procedure.

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1 33. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed
2 to maintain accurate and/or complete medical records relating to the diagnosis, treatment and care
3 of Patient C when he failed to document Patient C's blood pressure or pulse during the liposuction
4 procedure.

5 34. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed
6 to maintain accurate and/or complete medical records relating to the diagnosis, treatment and care
7 of Patient D when he failed to monitor the patient's condition of hypertension and increased risk
8 of hematoma. Respondent also failed to indicate on the discharge note that blood pressure was in
9 the normal limits and her pulses were intact.

10 35. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed
11 to maintain accurate and/or complete medical records relating to the diagnosis, treatment and care
12 of Patient E when he failed to document Patient's E's blood pressure or pulse during the
13 liposuction procedure.

14 36. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed
15 to maintain accurate and/or complete medical records relating to the diagnosis, treatment and care
16 of Patient F when he failed to document Patient F's blood pressure or pulse during the liposuction
17 procedure.

18 37. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed
19 to maintain accurate and/or complete medical records relating to the diagnosis, treatment and care
20 of Patient G when he failed to document that antibiotics were given prior to the liposuction
21 procedure.

22 38. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed
23 to maintain accurate and/or complete medical records relating to the diagnosis, treatment and care
24 of Patient H when he failed to document within Patient H's medical chart any specific consent by
25 Patient H for a procedure of fat injections into the buttocks.

26 39. By reason of the foregoing, Respondent is subject to discipline by the Board as
27 provided in NAC 630.410.

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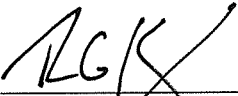
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WHEREFORE, the Investigative Committee prays:

1. That the Board give Respondent notice of the charges herein against him and give him notice that he 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 the sanctions it will impose if it finds Respondent violated the Medical Practice Act;
4. That the Board make, issue and serve on Respondent, in writing, its findings of fact, conclusions of law and order, which shall include the sanctions imposed; and
5. That the Board take such other and further action as may be just and proper in these premises.

DATED this 3rd day of February, 2017.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 
Robert Kilroy, Esq.
General Counsel
Attorney for the Investigative Committee

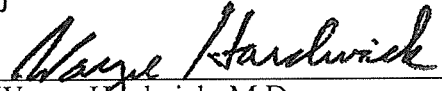
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VERIFICATION

STATE OF NEVADA)
 : ss.
COUNTY OF WASHOE)

Wayne Hardwick, 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 with respect to Case No. 17-36566-1; that he has read the foregoing Complaint; and that based upon information discovered during the course of the investigation into this Complaint against Respondent, he believes the allegations and charges in the foregoing Complaint against Respondent are true, accurate and correct.

Dated this 3rd day of February, 2017.



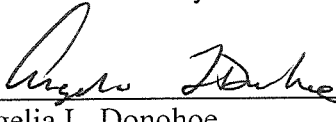
Wayne Hardwick, M.D.

CERTIFICATE OF MAILING

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 3rd day of February 2017; I served a file copy of COMPLAINT & PATIENT DESIGNATION, via USPS certified return receipt mail to the following:

Trevor Schmidt, PA-C
2610 Horizon Ridge Pkwy., Ste. 203
Henderson, NV 89052

Dated this 3rd day of February, 2017.



Angelia L. Donohoe
Legal Assistant

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