


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

\* \* \* \* \*

**In the Matter of Charges and Complaint  
Against:  
TREVOR ANDREAS SCHMIDT, PA-C  
Respondent.**

**Case No. 23-36566-1**

**FILED**  
**FEB 21 2023**  
NEVADA STATE BOARD OF  
MEDICAL EXAMINERS  
By: 

**COMPLAINT**

The Investigative Committee<sup>1</sup> (IC) of the Nevada State Board of Medical Examiners (Board), by and through Deonne E. Contine, General Counsel and attorney for the IC, having a reasonable basis to believe that Trevor Andreas Schmidt, PA-C, (Respondent) violated the provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630 (collectively, the Medical Practice Act), hereby issues its Complaint, stating the IC's charges and allegations as follows:

1. Respondent was at all times relative to this Complaint a physician assistant holding an active license to practice medicine in the State of Nevada (License No. PA1219). Respondent was originally licensed by the Board on May 12, 2010.

2. At all times relative to this Complaint, Respondent was the owner of MyShape Lipo.

3. At all times relative to this Complaint Respondent was practicing medicine at MyShape Lipo.

4. At all times relative to this Complaint John Bowman (NV License No. 4945) was Respondent's supervising physician. Dr. Bowman was originally licensed by the Board on January 7, 1984. Dr. Bowman's specialties are listed as Orthopedic Surgery and Sports Medicine

<sup>1</sup> 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., Aury Nagy, M.D., and Ms. Maggie Arias-Petrel.

1 on the Board's website. Plastic and Cosmetic surgery are not specialties of Orthopedic Surgery or  
2 Sports Medicine.

3 5. Dr. Bowman's training in liposuction surgery is limited to a two (2) day course in  
4 liposuction and fat transfer offered by the International Society of Cosmetogynecology (ISCG).

5 6. Upon information and belief, Dr. Bowman did not perform liposuction surgery and  
6 delegated all liposuction procedures to Respondent during the time he was Respondent's  
7 supervising physician.

8 7. Respondent completed basic training in liposuction through a two (2) day course in  
9 liposuction and fat transfer offered by the ISCG.

10 8. Respondent, as a physician assistant, has no other formal surgical training in plastic  
11 or cosmetic surgery and is not board certified in any specialty.

12 9. Respondent has had seven (7) supervising physicians since May 12, 2010.  
13 According to the Board's website, their specialties include Emergency Medicine, Internal  
14 Medicine/Cardiovascular Diseases and Family Practice.

15 10. Patient A<sup>2</sup> was a thirty-six (36) year-old female at the time of the events at issue.

16 11. Some time prior to November 12, 2020, Patient A contacted Respondent to  
17 schedule liposuction surgery on her pubic area.

18 12. Respondent saw Patient A at MyShape Lipo on  
19 November 12, 2020, when she had a scheduled appointment for her liposuction surgery on her  
20 pubic area. When she arrived for her appointment, Patient A advised that she would also like  
21 liposuction surgery on her abdomen, which Respondent accommodated on that day.

22 13. It appears that Patient A completed a packet of preprinted forms on her arrival for  
23 her appointment on November 12, 2020. On her Patient Information form, Patient A indicated that  
24 she weighed two hundred seventy (270) pounds and had previous gastric sleeve surgery.

25 14. Measurements taken just prior to the surgery on November 12, 2020, which appear  
26 to be taken by Respondent's medical assistant, show "48" Upper Abdomen, 51" Belly Button, 51"  
27 Lower Abdomen/Hips and 49" Circumference Around Butt and a garment size of 3 Large".

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<sup>2</sup> Patient A's true identity is not disclosed herein to protect her privacy but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint.

OFFICE OF THE GENERAL COUNSEL

Nevada State Board of Medical Examiners

9600 Gateway Drive

Reno, Nevada 89521

(775) 688-2559

1           15.    Respondent's medical records lack any documentation that Respondent discussed  
2 Patient A's medical history with her or otherwise evaluated whether Patient A was an appropriate  
3 candidate for liposuction surgery.

4           16.    Upon information and belief, Respondent never discussed Patient A's medical  
5 history with her or otherwise evaluated whether Patient A was an appropriate candidate for  
6 liposuction surgery.

7           17.    Respondent's medical records lack documentation of any preoperative  
8 appointments or consultations with Patient A.

9           18.    Upon information and belief, Respondent did not have any preoperative  
10 appointments or consultations with Patient A.

11          19.    Respondent's medical records lack any documentation of any preoperative lab  
12 work ordered for Patient A.

13          20.    Upon information and belief, Respondent did not order any preoperative lab work  
14 for Patient A.

15          21.    Respondent's medical records lack any documentation that Respondent prescribed  
16 preoperative antibiotics for Patient A.

17          22.    Upon information and belief, Respondent did not prescribe Patient A any  
18 preoperative antibiotics.

19          23.    Respondent performed liposuction surgery on Patient A using tumescent anesthesia  
20 for each of the liposuction areas and acted as both surgeon and anesthesiologist during Patient A's  
21 surgery.

22          24.    The only narrative in Respondent's medical records specifically related to  
23 Patient A is confined to the Practitioner's Notes Form and is largely illegible.

24          25.    Respondent Practitioner's Notes were deciphered to illuminate that Patient A did  
25 well and that the surgery was well tolerated. It also notes that loose skin was discussed.

26          26.    Respondent uses the Liposuction Procedure Report form to report a patient's  
27 allergies, medications used, whether the patient is pregnant, vital signs, lidocaine, aspirate, and the

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1 lipo laser areas treated. This preprinted form also seems to have a standard narrative that is used  
2 on all Liposuction Procedure Reports.

3 27. The medical records lack documentation on Patient A's blood pressure during her  
4 liposuction surgery.

5 28. Respondent's medical records lack documentation on the medications that were  
6 used during the liposuction surgery.

7 29. The medical records note that Patient A was prescribed antibiotics at the time of  
8 surgery and that no pain medications were prescribed due to an oxycodone prescription ordered  
9 for Patient A from a different provider on October 28, 2020.

10 30. Respondent's medical records lack documentation of Respondent's post operative  
11 evaluation or care for Patient A.

12 31. Upon information and belief, Respondent did not provide post operative evaluation  
13 or care for Patient A.

14 32. Notes which seem to be taken by various members of Respondent's staff start the  
15 day after Patient A's liposuction surgery.

16 33. On November 13, 2020, the note states that Patient A indicated that she was  
17 experiencing nausea and heartburn the day after the procedure.

18 34. On November 16, 2020, the note states that Patient A was upset about the price of  
19 the procedure and that she had to hire someone to take care of her during recovery from the  
20 surgery.

21 35. On November 18, 2020, it appears that Patient A was notified that she was  
22 erroneously overcharged and would be refunded five hundred dollars (\$500). It also indicates she  
23 would receive five (5) free presso treatments because she was struggling with swelling.

24 36. Notes further document that on November 23, 2020, Patient A came in for presso  
25 therapy and state she was in a lot of pain and nauseous all the time.

26 37. On December 3, 2020, a staff note includes that Patient A communicated a foul  
27 odor coming from her lower abdomen. She indicated that she was still draining fluid and using  
28 gauze over the wound. Staff recommend that she discontinue doing so and wash area thoroughly.

1 The note also says she had finished the antibiotics that day and “seen her surgeon at the beginning  
2 of this week.” Staff requested she send photos to be evaluated by Respondent. Note also states  
3 that Patient A said she was not experiencing any symptoms of infection.

4 38. The final staff note related to Patient A says she was admitted to the hospital on the  
5 evening of December 3, 2020, due to infection. Staff noted that Patient A was diabetic and that  
6 vitals were unstable, and she was not doing well.

7 39. Respondent, as a physician assistant, holds no hospital privileges and could provide  
8 no post operative emergency care to Patient A.

9 **COUNT I**

10 **NRS 630.301(4) - Malpractice**

11 40. All of the allegations contained in the above paragraphs are hereby incorporated by  
12 reference as though fully set forth herein.

13 41. NRS 630.301(4) provides that malpractice of a physician assistant is grounds for  
14 initiating disciplinary action against a licensee.

15 42. NAC 630.040 defines malpractice as “the failure of a physician, in treating a  
16 patient, to use the reasonable care, skill, or knowledge ordinarily used under similar  
17 circumstances.”

18 43. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed  
19 to use the reasonable care, skill or knowledge ordinarily used under similar circumstances  
20 including failing to provide any pre or post operative care when rendering liposuction surgery  
21 services to Patient A.

22 44. By reason of the foregoing, Respondent is subject to discipline by the Board as  
23 provided in NRS 630.352.

24 **COUNT II**

25 **NRS 630.3062(1)(a) - Failure to Maintain Appropriate Medical Records**

26 45. All of the allegations contained in the above paragraphs are hereby incorporated by  
27 reference as though fully set forth herein.

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1 46. NRS 630.3062(1)(a) provides that the “failure to maintain timely, legible, accurate  
2 and complete medical records relating to the diagnosis, treatment and care of a patient” constitute  
3 grounds for initiating discipline against a licensee.

4 47. Respondent failed to maintain complete medical records relating to the diagnosis,  
5 treatment and care of Patient A, by failing to correctly document his actions when he treated  
6 Patient A, whose medical records were not timely, legible, accurate, and complete because  
7 Respondent relied on preprinted forms that were not complete and contained limited narrative and  
8 because he failed to document pre or post operative care.

9 48. By reason of the foregoing, Respondent is subject to discipline by the Board as  
10 provided in NRS 630.352.

11 **COUNT III**

12 **NRS 630.306(1)(e) – Practicing Beyond Scope of License**

13 49. All of the allegations contained in the above paragraphs are hereby incorporated by  
14 reference as though fully set forth herein.

15 50. Violation of a standard of practice adopted by the Board is grounds for disciplinary  
16 action pursuant to NRS 630.306(1)(e).

17 51. NAC 630.360(1) permits a physician assistant to perform only those medical  
18 services that are within the scope of the practice of the supervising physician of the physician  
19 assistant.

20 52. Respondent violated NRS 630.306(1)(e) by providing medical services outside the  
21 scope of practice of his supervising physician by performing liposuction surgery on Patient A.

22 53. By reason of the foregoing, Respondent is subject to discipline by the Nevada State  
23 Board of Medical Examiners as provided in NRS 630.352.

24 **COUNT IV**

25 **NRS 630.306(1)(e) – Competence**

26 54. All of the allegations contained in the above paragraphs are hereby incorporated by  
27 reference as though fully set forth herein.

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1           55.    Violation of a standard of practice adopted by the Board is grounds for disciplinary  
2 action pursuant to NRS 630.306(1)(e).

3           56.    NAC 630.360(1) permits a physician assistant to perform only those medical  
4 services that are commensurate with the education, training, experience and level of competence  
5 of the physician assistant.

6           57.    Respondent violated NRS 630.306(1)(e) by providing medical services not  
7 commensurate with his education, training, experience, and level of competence by performing  
8 liposuction surgery on Patient A.

9           58.    By reason of the foregoing, Respondent is subject to discipline by the Nevada State  
10 Board of Medical Examiners as provided in NRS 630.352.

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

12           1.    That the Board give Respondent notice of the charges herein against him and give  
13 him notice that he may file an answer to the Complaint herein as set forth in  
14 NRS 630.339(2) within twenty (20) days of service of the Complaint;

15           2.    That the Board set a time and place for a formal hearing after holding an Early  
16 Case Conference pursuant to NRS 630.339(3);

17           3.    That the Board determine what sanctions to impose if it determines there has been  
18 a violation or violations of the Medical Practice Act committed by Respondent;

19           4.    That the Board award fees and costs for the investigation and prosecution of this  
20 case as outlined in NRS 622.400;

21           5.    That the Board make, issue and serve on Respondent its findings of fact,  
22 conclusions of law and order, in writing, that includes the sanctions imposed; and

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6. That the Board take such other and further action as may be just and proper in these premises.

DATED this 21 day of February, 2023.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: Deonne E. Contine  
DEONNE E. CONTINE  
General Counsel  
9600 Gateway Drive  
Reno, NV 89521  
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*Attorney for the Investigative Committee*



VERIFICATION


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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 2<sup>1</sup> day of February, 2023.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:   
VICTOR M. MURO, M.D.  
*Chairman of the Investigative Committee*

1 **CERTIFICATE OF SERVICE**


2 I hereby certify that I am employed by the Nevada State Board of Medical Examiners and  
3 that on the 21st day of February, 2023, I served a file-stamped copy of the foregoing  
4 **COMPLAINT**, with accompanying required fingerprinting materials via U.S. Certified Mail, to  
5 the following parties:

6 TREVOR ANDREAS SCHMIDT, PA-C  
7 2217 Chatsworth Ct.  
8 Henderson, NV 89052  
Tracking No.: 9171 9690 0935 0254 7665 99

9 with a copy sent by regular mail to:

10 JOHNATHON FAYEGHI, ESQ.  
11 Skylar Williams PLLC  
12 410 S. Rampart Blvd., Suite 350  
Las Vegas, NV 89145

13 DATED this 21<sup>st</sup> day of February, 2023.

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15 \_\_\_\_\_  
16 MERCEDES FUENTES  
17 Legal Assistant  
18 Nevada State Board of Medical Examiners  
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