

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

\* \* \* \*

## **In the Matter of Charges and Complaints**

Case No. 25-32904-1

### Against:

KIARASH L. MIRKIA, M.D.,

**Respondent.**

FILED

OCT - 3 2025

NEVADA STATE BOARD OF  
MEDICAL EXAMINERS

## **COMPLAINT**

The Investigative Committee<sup>1</sup> (IC) of the Nevada State Board of Medical Examiners (Board), by and through William P. Shogren, Deputy General Counsel and attorney for the IC, having a reasonable basis to believe that Kiarash L. Mirkia, M.D. (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 medical doctor holding an active license to practice medicine in the State of Nevada (License No. 12548). Respondent was originally licensed by the Board on December 1, 2007.

2. Information submitted to the Board by Respondent, and included on the Board's website, shows Respondent's specialties as Traumatic Surgery, General Surgery and Critical Care. Plastic and cosmetic surgery are not specialties of Traumatic Surgery, General Surgery, or Critical Care.

3. Additional information submitted to the Board by Respondent, and included on the Board's website, shows that Respondent completed an internship and residency in General Surgery, and completed a fellowship in Critical Care Surgery. This information does not indicate

<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 Bret W. Frey, M.D., Col. Eric D. Wade, USAF (Ret.), and Hugh L. Bassewitz, M.D., FAAOS.

1 that Respondent completed an internship, residency, or fellowship in plastic and/or cosmetic  
2 surgery.

3 4. At all times relative to this Complaint, Respondent performed liposuction surgery,  
4 an elective cosmetic procedure that is not medically necessary, at Silueta Medspa LLC (Silueta).

5 5. Respondent was certified by the American Board of Surgery, which is a member  
6 Board of the American Board of Medical Specialties (ABMS), with a specialty in surgery and a  
7 subspecialty in surgical critical care. Respondent's certifications for both general surgery and  
8 surgical critical care, with the ABMS, expired on or about December 31, 2021.

9 6. Respondent is not certified by any other ABMS Board.

10 7. The website for Silueta states “[o]ur board-certified plastic surgeons and expert  
11 medical professionals specialize in a range of services, including awake liposuction or general  
12 anesthesia plastic surgeries, facial rejuvenation, body contouring, and minimally invasive  
13 treatments, utilizing state-of-the-art equipment and cutting-edge techniques.” Next to this  
14 statement is a photo of Respondent.

15 8. Upon information and belief, the website for Silueta does not contain any other  
16 information concerning Respondent, such as information about his credentials.

17 9. Upon information and belief, Respondent has received training in liposuction  
18 surgery only by way of a twenty-two (22) hour seminar for smart liposuction in November 2014  
19 in Idaho, through the American Society of Cosmetics Physicians.

20 10. Notwithstanding this limited training and his ABMS Board Certification as a  
21 General Surgeon, Respondent advertises himself as a board-certified plastic surgeon and/or an  
22 expert medical professional.

23 11. Patient A<sup>2</sup> was a forty-three (43) year-old female at the time of the events at issue  
24 in this Complaint.

25 12. Patient A first contacted Silueta in December 2023, via text message, regarding  
26 possible cosmetic improvement of her neck and jawline.

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2     <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.

1       13. Patient A spoke with a staff member at Silueta several times via text message in  
2 December 2023 and January 2024. At one point, Patient A asked if the doctor performing the  
3 service was a plastic surgeon board certified physician. The Silueta staff member responded with  
4 “[y]es, he is a double board-certified and his name is Mirkia, you’re more than welcome to meet  
5 him in person if you want.”

6       14. Patient A presented to Respondent for a consultation on January 20, 2024. An  
7 evaluation form was filled out documenting Respondent’s examination and recommendations.

8       15. Photos taken of Patient A from on or around this date demonstrated that Patient A  
9 had numerous open wounds and excoriations on her face and severe post-inflammatory  
10 hypopigmented craters on each cheek, all of which are contraindications to performing surgery.  
11 Specifically, Patient A demonstrated open wounds at the surgical site which is a contraindication  
12 for the procedure, in part because open wounds can lead to a higher chance of post-operative  
13 infection.

14       16. The photos of Patient A taken on or about January 20, 2024, prior to surgery, also  
15 demonstrated possible self-induced facial manipulation and trauma, which again indicated that  
16 Patient A was unsuitable for liposuction surgery, due to possible underlying psychiatric  
17 conditions.

18       17. However, Respondent on or about January 20, 2024 did not document Patient A’s  
19 open wounds, excoriations, or hyperpigmentation, other than stating “acne scarring.” Based on  
20 Patient A’s photos, Patient A clearly had physical findings more severe than acne scarring,  
21 including evidence of possible self-mutilating practices.

22       18. Respondent further did not document that he conducted a thorough preoperative  
23 assessment prior to the procedure date to adequately assess Patient A’s medical history and  
24 whether Patient A was an appropriate candidate for liposuction surgery, despite Patient A’s  
25 physical findings requiring a more thorough evaluation and preoperative work-up.  
26 Documentation could have included, but is not limited to, discussion of Patient A’s physical  
27 condition to determine the underlying medical reason for Patient A’s open wounds, excoriations,

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1 and post-inflammatory hyperpigmentation, as well as documentation of discussion of potential  
2 underlying psychiatric conditions involving self-mutilating practices.

3 19. Upon information and belief, Respondent did not conduct a thorough history and  
4 physical examination of Patient A prior to performing liposuction surgery.

5 20. Patient A underwent liposuction on January 24, 2024 on her neck and jawline.  
6 Respondent removed 250 cc of lipoaspirate from Patient A's chin and neck, a larger amount than  
7 needed given Patient A's presenting condition, indicating over-resection.

8 21. Patient A returned to Silueta on January 25, 2024, with complaints of postoperative  
9 nausea and vomiting. Patient A also voiced concerns about postoperative swelling. Patient A was  
10 reassured that her swelling would improve.

11 22. Patient A returned to Respondent on January 26, 2024 and February 3, 2024, with  
12 continued complaints of swelling. On February 3, 2024, Respondent recommended Patient A start  
13 lymphatic massage. Patient A completed two (2) of these sessions.

14 23. On April 3, 2024, Patient A went to the emergency room with complaints of  
15 swelling, pain, and tightness in her neck. Patient A was found to have incidental hypokalemia  
16 (low potassium) and was told that she was having severe anxiety related to her swelling and  
17 dysphagia.

18 24. Patient A presented to an ear, nose, and throat (ENT) specialist on June 7, 2024.  
19 The ENT specialist assessed Patient A with likely postsurgical edema and scarring and noted that  
20 he would refer Patient A to a facial plastic surgeon.

21 **COUNT I**

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

23 25. All of the allegations contained in the above paragraphs are hereby incorporated by  
24 reference as though fully set forth herein.

25 26. NRS 630.301(4) provides that malpractice of a physician is grounds for initiating  
26 disciplinary action against a licensee.

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1       27. NAC 630.040 defines malpractice as "the failure of a physician, in treating a  
2 patient, to use the reasonable care, skill, or knowledge ordinarily used under similar  
3 circumstances."

4       28. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed  
5 to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when  
6 rendering medical services to Patient A because (1) he failed to provide a thorough preoperative  
7 assessment prior to the procedure date to adequately assess Patient A's medical history and  
8 whether Patient A was an appropriate candidate for liposuction surgery, despite Patient A's  
9 physical findings requiring a thorough preoperative assessment; and (2) removed 250 cc of  
10 lipoaspirate from Patient A's chin and neck, a larger amount than needed given Patient A's  
11 presenting condition.

12        29. By reason of the foregoing, Respondent is subject to discipline by the Board as  
13 provided in NRS 630.352.

**COUNT II**

## **NRS 630.3062(1)(a) - Failure to Maintain Complete Medical Records**

16       30. All of the allegations contained in the above paragraphs are hereby incorporated by  
17 reference as though fully set forth herein.

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

21       32.    Respondent failed to maintain accurate medical records relating to the diagnosis,  
22 treatment, and care of Patient A, specifically because he failed to document a thorough  
23 preoperative assessment prior to the procedure date to adequately assess Patient A's medical  
24 history and whether Patient A was an appropriate candidate for liposuction surgery. This  
25 includes, but is not limited to, the fact that Respondent only noted "acne scarring" in the intake  
26 form, even though Patient A clearly had physical findings more severe than acne scarring.  
27 Therefore, Respondent's medical records relating to Patient A were not timely, legible, accurate,  
28 and complete.

1       33. By reason of the foregoing, Respondent is subject to discipline by the Board as  
2 provided in NRS 630.352.

**COUNT III**

## **NRS 630.306(1)(e) - Practice Beyond Scope of License**

5       34. All of the allegations contained in the above paragraphs are hereby incorporated by  
6 reference as though fully set forth herein.

7       35.    NRS 630.306(1)(e) provides that practicing or offering to practice beyond the  
8 scope permitted by law or performing services which the licensee knows or has reason to know  
9 that he or she is not competent to perform, or which are beyond the scope of his or her training  
10 constitutes grounds for initiating disciplinary action.

11       36.     As demonstrated by, but not limited to the above-outlined facts, Respondent is not,  
12 and has never been, a board-certified plastic surgeon and has only received instruction in cosmetic  
13 surgery from a seminar in 2014. Therefore, Respondent lacks the requisite and proper training in  
14 plastic and cosmetic surgery to perform liposuction surgery.

15       37. By reason of the foregoing, Respondent is subject to discipline by the Board as  
16 provided in NRS 630.352.

**COUNT IV**

**NRS 630.306(1)(b)(2) - Violation of Standards of Practice Established by Regulation -**

### False, Deceptive, or Misleading Advertising

20       38. All of the allegations contained in the above paragraphs are hereby incorporated by  
21 reference as though fully set forth herein.

22       39.   Violation of a standard of practice adopted by the Board is grounds for disciplinary  
23 action pursuant to NRS 630.306(1)(b)(2).

24       40. NAC 630.190(1)(e) provides that a licensee shall not advertise in such a manner  
25      that the advertising includes any statement which is known to be false, or through the exercise of  
26      reasonable care should be known to be false, deceptive, misleading or harmful, in order to induce  
27      any person to purchase, utilize or acquire any professional services or to enter into any obligation  
28      or transaction relating thereto.

1       41.    NAC 630.190(1)(g) provides that a licensee shall not advertise in such a manner  
2 that the advertising is false, deceptive or misleading in regard to services performed or to be  
3 performed.

4       42.    NAC 630.190(2) states that it is sufficient for disciplinary purposes that any  
5 statement or other advertising described in paragraph (e), (f) or (g) of subsection 1 has a tendency  
6 to: (a) Deceive, mislead or harm the public because of its false, deceptive, misleading or harmful  
7 character; or (b) Produce unrealistic expectations in particular cases, even though no member of  
8 the public is actually deceived, misled or harmed, or no unrealistic expectations are actually  
9 produced by the statement or other advertising.

10      43.    The Silueta website advertises Respondent as a board-certified plastic surgeon  
11 and/or medical professional who “specialize[s] in a range of services, including awake liposuction  
12 or general anesthesia plastic surgeries, facial rejuvenation, body contouring, and minimally  
13 invasive treatments, utilizing state-of-the-art equipment and cutting-edge techniques.”

14      44.    Further, an employee of Silutea represented to Patient A in December 2023 that  
15 Respondent was a double board-certified plastic surgeon, after Patient A specifically asked if the  
16 doctor performing liposuction surgery was a plastic surgeon board certified physician.

17      45.    However, Respondent is not a board-certified plastic surgeon and only completed a  
18 twenty-two (22) hour seminar in 2014 on liposuction surgery.

19      46.    Thus, Respondent advertised himself in a manner that included statements which  
20 were known to be false, or through the exercise of reasonable care should be known to be false,  
21 deceptive, misleading or harmful, in order to induce Patient A to utilize his professional services.

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

24      **WHEREFORE**, the IC prays:

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

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- 1        2.    That the Board set a time and place for a formal hearing after holding an Early
- 2        Case Conference pursuant to NRS 630.339(3);
- 3        3.    That the Board determine what sanctions to impose if it determines there has been
- 4        a violation or violations of the Medical Practice Act committed by Respondent;
- 5        4.    That the Board award fees and costs for the investigation and prosecution of this
- 6        case as outlined in NRS 622.400;
- 7        5.    That the Board make, issue and serve on Respondent its findings of fact,
- 8        conclusions of law and order, in writing, that includes the sanctions imposed; and
- 9        6.    That the Board take such other and further action as may be just and proper in these
- 10      premises.

11      DATED this 3<sup>rd</sup> day of October 2025.

12      INVESTIGATIVE COMMITTEE OF THE  
13      NEVADA STATE BOARD OF MEDICAL EXAMINERS

14      By:



15      WILLIAM P. SHOGREN  
16      Deputy General Counsel  
17      9600 Gateway Drive  
18      Reno, NV 89521  
19      Tel: (775) 688-2559  
20      Email: [shogrenw@medboard.nv.gov](mailto:shogrenw@medboard.nv.gov)  
21      Attorney for the Investigative Committee

## VERIFICATION

2 STATE OF NEVADA )  
3 COUNTY OF WASHOE ) : SS.

4 Bret W. Frey, M.D., having been duly sworn, hereby deposes and states under penalty of  
5 perjury that he is the Chairman of the Investigative Committee of the Nevada State Board of  
6 Medical Examiners that authorized the Complaint against the Respondent herein; that he has read  
7 the foregoing Complaint; and that based upon information discovered in the course of the  
8 investigation into a complaint against Respondent, he believes that the allegations and charges in  
9 the foregoing Complaint against Respondent are true, accurate and correct.

10 DATED this 3rd day of October, 2025.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

**BRET W. FREY, M.D.**  
*Chairman of the Investigative Committee*

**CERTIFICATE OF SERVICE**

I hereby certify that I am employed by the Nevada State Board of Medical Examiners and that on the 3rd day of October, 2025, I served a file-stamped copy of the foregoing **COMPLAINT** and accompanying **PATIENT DESIGNATION**, via USPS Certified Mail, postage pre-paid, to the following parties:

KIARASH L. MIRKIA, M.D.  
P.O. Box 371849  
Las Vegas, NV 89137

Tracking No.: 9489 0178 9820 3045 5225 70

DATED this 3rd day of October, 2025.

MERCEDES FUENTES  
Legal Assistant  
Nevada State Board of Medical Examiners