
Botox, Fillers, and Investigations: New York Steps Up Enforcement Against Med Spas

FEATURED ATTORNEYS



Ayman H. Soliman

Executive Partner



Violetta Mamonov

Associate

Demand for aesthetic treatments including Botox, dermal fillers, IV therapy, microneedling, body contouring, and GLP-1 weight-loss treatments continues to grow rapidly. At the same time, regulators in New York are increasing scrutiny of how med spas are structured and operated.

Recent enforcement activity makes clear that businesses operating in this space must ensure their operations comply with New York's medical practice and licensing laws.

That scrutiny is already translating into significant enforcement actions. In late 2025, a New York City report identified violations at all 15 med spas it inspected, with the first four completed cases resulting in license revocations. ¹ In January 2026, the New York Department of State announced the results of a statewide enforcement initiative conducted in coordination with the Department of Health and the State Education Department. Regulators inspected 223 appearance enhancement businesses and cited 87 for potential violations, including the unlawful practice of medicine. Penalties ranged from monetary fines to license suspensions and revocations. ²

At the center of many of these cases is a fundamental regulatory question about where spa non-medical services end, and where the practice of medicine begins.

While certain services such as facials, waxing, and other traditional spa treatments may be performed under cosmetology or esthetician licenses, many procedures commonly offered by med spas are legally considered medical services under New York law. Treatments such as injectables, IV therapy, and prescription-based weight-loss treatments generally must be provided through a properly licensed medical practice by qualified healthcare professionals and under appropriate medical supervision.

Regulators are increasingly examining ownership structures, supervision models, staffing arrangements, and marketing practices. Businesses that are not structured properly may face significant legal consequences.

For med spa owners, investors, physicians, and healthcare entrepreneurs, proper structuring and regulatory compliance are critical to protecting the business and allowing it to grow safely in this rapidly expanding market.

Abrams Fensterman regularly advises med spas, aesthetic practices, investors, and healthcare professionals on legally compliant structures, regulatory risk management, and best operational practices under New York law.

If you have questions about your current structure or are planning to enter the med spa market, please contact [Ayman Soliman, Esq.](#) or [Violetta Mamonov, Esq.](#) at (516) 328-2300.

This client alert is provided for informational purposes only and does not constitute legal advice.

1 N.Y.C. Council, Office of Oversight & Investigations, A Joint Enforcement Operation Against Improperly Licensed Medical Spas in New York City (Dec. 2025).

2 Press Release, N.Y. Dep't of State, New York Department of State Issues Warning to Consumers After Investigations of Med Spa Service Providers (Jan. 2026).



Ayman Soliman

is an integral member of the firm's award-winning [Healthcare Law Practice](#) group. He is Director of the firm's Physician Practices, focusing on healthcare transactions, regulatory compliance, and government investigations, representing medical professionals, group practices, ambulatory surgery centers, diagnostic and treatment centers, urgent care centers, hospitals and a wide range of healthcare organizations and providers.



Violetta Mamonov, Esq.

is an Associate at Abrams Fensterman where her practice focuses on healthcare transactions, mergers and acquisitions, and regulatory compliance. With prior in-house experience representing healthcare providers, including pharmacies, she offers clients practical insight into the legal and operational challenges facing today's evolving healthcare industry.