

BEFORE THE BOARD OF MEDICAL EXAMINERS  
OF THE STATE OF NEVADA

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In the Matter of Charges and Complaint

Case No. 25-51775-1

Against:

FILED

DANA RAYMOND TOWLE, M.D.,

NOV 12 2025

Respondent.

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 Ian J. Cumings, Senior Deputy General Counsel and attorney for the IC, having a reasonable basis to believe that Dana Raymond Towle, 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. 19826). Respondent was originally licensed by the Board on April 29, 2020.

2. Patient A<sup>2</sup> was a thirty-one (31) year-old female at the time of the events at issue. During the relevant time period, Patient A was a resident of California who traveled to Las Vegas, Nevada for cosmetic surgical care.

3. Patient A presented to Mia Aesthetics on February 9, 2021, for an initial preoperative examination for a Brazilian butt lift operation with liposuction to be performed on March 18, 2021.

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<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 Aury Nagy, M.D., Ms. Maggie Arias-Petrel, and Nick M. Spirtos, M.D., F.A.C.O.G.

<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.

**COUNT I**

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

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

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

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

24           14. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed  
25 to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when  
26 rendering medical services to Patient A as evidenced by Respondent’s failure to address and follow-  
27 up with Patient A after March 22, 2021, despite having documented a post-operative complication  
28 after performing a Brazilian butt lift operation with liposuction on Patient A.

**COUNT II**

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

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

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

18. NAC 630.210 requires a physician to “seek consultation with another provider of health care in doubtful or difficult cases whenever it appears that consultation may enhance the quality of medical services.”

19. Respondent failed to timely seek consultation with regard to Patient A's medical condition after March 22, 2021. Respondent should have consulted with an appropriate care provider to address the doubtfulness of the diagnosis of Patient A's medical condition. Such a timely consultation would have confirmed or denied such a diagnosis and may have enhanced the quality of medical care provided to Patient A with regard to her post-operative complications following a Brazilian butt lift with liposuction procedure performed by Respondent on March 19, 2021.

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

**COUNT III**

**NRS 630.304(7) - Terminating Medical Care Without Adequate Notice to a Patient**

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

22. NRS 630.304(7) provides that terminating the medical care of a patient without adequate notice or without making other arrangements for the continued care of the patient is grounds for initiating disciplinary action.

23. Respondent terminated the medical care of Patient A following the March 22, 2021, post-operative visit without making any arrangements for Patient A's continued care, despite documented post-operative complications.

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

**WHEREFORE**, the IC 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 what sanctions to impose if it determines there has been a violation or violations of the Medical Practice Act committed by Respondent;

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

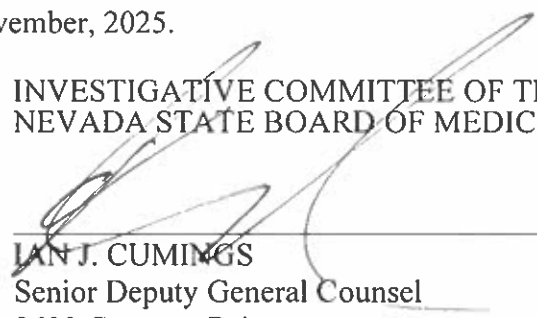
5. That the Board make, issue and serve on Respondent its findings of fact, conclusions of law and order, in writing, that includes the sanctions imposed; and

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

DATED this 12th day of November, 2025.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

  
IAN J. CUMINGS  
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*Attorney for the Investigative Committee*


VERIFICATION

STATE OF NEVADA )  
: ss.  
COUNTY OF CLARK )

Nick M. Spirtos, M.D., F.A.C.O.G., 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 November, 2025.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:   
NICK M. SPIRTOS, M.D., F.A.C.O.G.  
*Chairman of the Investigative Committee*