

BEFORE THE BOARD OF MEDICAL EXAMINERS  
OF THE STATE OF NEVADA

\* \* \* \* \*

In the Matter of Charges and Complaint

Case No. 25-51775-2

Against:

FILED

DANA RAYMOND TOWLE, M.D.,

NOV 19 2025

Respondent.

NEVADA STATE BOARD OF  
MEDICAL EXAMINERS

By: *W. M. Lee*

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 forty-four (44) year-old female at the time of the events at issue.

3. On March 7, 2023, Patient A presented to Respondents office for a pre-operative evaluation for cosmetic surgery scheduled surgery on March 8, 2025. Patient A's records demonstrate she paid for the "mommy makeover" which includes breast augmentation, breast lift, two (2) areas of liposuction. Patient A also requested and paid for chin liposuction.

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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.

1 4. Respondent did not see Patient A during the pre-operative visit, or at any time prior  
2 to performing surgery March 8, 2025.

3 5. On March 8, 2025, Patient A presented to Respondent for surgery. Respondent's  
4 operative note document that the procedures performed were abdominoplasty, suction assisted  
5 lipectomy of bilateral flanks and chin, mastopexy, and augmentation mammoplasty. According to  
6 Respondent, Patient A requested the chin liposuction be substituted for liposuction of the mons  
7 pubis. This was a conversation and a change in the surgical plan that is not documented in Patient  
8 A's medical records by Respondent. Moreover, the procedural note does not document that  
9 Respondent performed liposuction of the mons pubis or chin, despite Patient A paying for three (3)  
10 areas of liposuction.

11 6. At no time, prior to performing surgery, did Respondent perform a full physical  
12 evaluation of Patient A prior to scheduling specific surgeries and collecting payment for those  
13 surgeries.

14 **COUNT I**

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

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

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

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

22 10. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed  
23 to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when  
24 rendering medical services to Patient A by neglecting to perform a comprehensive pre-operative  
25 assessment of Patient A prior to performing surgery on her.

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

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**COUNT II**

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

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

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

14. Respondent failed to maintain complete medical records relating to the diagnosis, treatment and care of Patient A, by failing to correctly document his actions when he treated Patient A, whose medical records were not timely, legible, accurate, and complete as demonstrated by Respondent failing to document any change in the surgical plan of liposuction of the mons pubis instead of the chin.

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

**COUNT III**

**NRS 630.305(1)(d) – Charging Patient for Services Not Rendered**

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

17. NRS 630.305(1)(d) provides that "charging for visits to the physician's office which did not occur or for services which were not rendered or documented in the records of the patient" constitutes grounds for initiating discipline against a licensee.

18. Respondent failed to either document or perform liposuction of Patient A's chin, or the mons pubis despite Patient A requesting and paying for the procedure.

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

20. ///

21. ///

22. ///

1 **WHEREFORE**, the IC prays:

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

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

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

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

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

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

15 DATED this 19<sup>th</sup> day of November, 2025.

16 INVESTIGATIVE COMMITTEE OF THE  
17 NEVADA STATE BOARD OF MEDICAL EXAMINERS

18 By: \_\_\_\_\_

19 IAN J. CUMINGS

20 Senior Deputy General Counsel

21 9600 Gateway Drive

22 Reno, NV 89521

23 Tel: (775) 688-2559

24 Email: [icumings@medboard.nv.gov](mailto:icumings@medboard.nv.gov)

25 *Attorney for the Investigative Committee*  
26  
27  
28

VERIFICATION

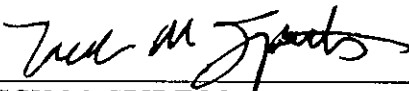
STATE OF NEVADA       )  
                                  : ss.  
COUNTY OF CLARK     )

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 19th day of November, 2025.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

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