

BEFORE THE BOARD OF HEALING ARTS
OF THE STATE OF KANSAS

FILED
 **FEB 24 2026**

In the Matter of)

Jeremy A. Goates, A.T.)
Kansas License No. 24-00498)

KS State Board of Healing Arts
KSBHA Docket No. 25-HA00045

**CONSENT ORDER FOR SURRENDER OF LICENSE
EFFECTIVE AS A REVOCATION**

COMES NOW Disciplinary Panel No. 38 (the "Panel"), a duly constituted committee of the Kansas State Board of Healing Arts ("the Board"), by and through Caitlin A. Kremer, Associate Litigation Counsel, and Jeremy A. Goates, A.T. ("Licensee"), by and through Kelli Stevens, Stevens Law, LLC, and move the Board for approval of this Consent Order affecting Licensee's license to practice as an athletic trainer in Kansas. The parties stipulate and agree to the following:

1. Licensee's last known mailing address to the Board is: **CONFIDENTIAL**
CONFIDENTIAL Licensee's last known e-mail address to the Board is: **CONFIDENTIAL**
2. Licensee is or has been licensed to practice as an athletic trainer in the State of Kansas, having been issued License No. 24-00498 on or about December 19, 2005. Licensee last renewed such license on or about December 30, 2024. Licensee's license status was changed to "Inactive," on December 29, 2023, and is currently "Inactive."
3. This Consent Order is based on the following facts, which the parties agree to and stipulate to be true and relevant to the requested relief:
 - a. At all times relevant to the allegations set forth in this petition, Licensee was employed by **CONFIDENTIAL**

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CONFIDENTIAL

CONFIDENTIAL as an athletic trainer.

b. Through his employment with ^{CONFIDENTIAL}, Licensee was able to access the electronic medical records (“EMR”) for patients at **CONFIDENTIAL**

c. On or about February 21, 2023, Licensee was identified by ^{CONFIDENTIAL} personnel as having accessed the electronic medical records of over 300 patients within the ^{CONFIDENTIAL} system without authorization, over 100 of which included sensitive images, on various dates from September 27, 2021, through February 21, 2023.

d. **CONFIDENTIAL**

e. **CONFIDENTIAL**, Licensee admitted to the following:

- i. That he had electronically searched for patients seen at plastic surgery clinics;
- ii. That he had viewed before and after images of patients who had undergone breast augmentation procedures;
- iii. That he had accessed such images for his personal use;
- iv. That he had accessed patients’ medical records through the EMR system from home; and

- v. That he had also accessed patient medical records for ^{CONFIDENTIAL} employees, former employees, and for patients flagged in the record system as “neighbors.”
 - f. On or about March 22, 2023, **CONFIDENTIAL** terminated Licensee’s employment.
4. Licensee has committed an act or acts in violation of the Kansas Athletic Trainers Licensure Act, K.S.A. 65-6901 *et seq.* and/or applicable rules and regulations adopted by the Board. Specifically:
- a. K.S.A. 65-6911(a)(5) in that Licensee has engaged in “... misconduct, fraud, misrepresentation, or dishonesty in the performance of the functions or duties of an athletic trainer,” to wit: Licensee repeatedly gained unauthorized access to protected, confidential medical records and related sensitive images not related to his job duties as an athletic trainer, over the course of several months, and for his own personal use;
 - b. K.S.A. 65-6911(a)(9) in that Licensee has breached a “professional trust or confidence,” to wit: Licensee repeatedly gained unauthorized access to protected, confidential medical records and related sensitive images not related to his job duties as an athletic trainer, over the course of several months, and for his own personal use;
 - c. K.S.A. 65-6911(a)(10) in that Licensee has committed an act(s) of unprofessional conduct, as further defined by K.A.R. 100-69-7(a)(8) as conduct likely to harm the

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public, to wit: Licensee repeatedly gained unauthorized access to protected, confidential medical records and related sensitive images not related to his job duties as an athletic trainer, over the course of several months, and for his own personal use; and/or

- d. K.S.A. 65-6911(a)(10) in that Licensee has committed an act(s) of unprofessional conduct, as further defined by K.A.R. 100-69-7(a)(21) as willful and/or repeated violations of regulations of the Board, to wit: Licensee repeatedly gained unauthorized access to protected, confidential medical records and related sensitive images not related to his job duties as an athletic trainer, over the course of several months, and for his own personal use.

5. Licensee acknowledges he has violated the Kansas Athletic Trainers Licensure Act with respect to the above allegations. Licensee further waives his right to dispute or otherwise contest the allegations contained in the above paragraphs in any further proceeding before this Board.

6. Licensee voluntarily and knowingly waives his right to a hearing. Licensee voluntarily and knowingly waives his right to present a defense by oral testimony and documentary evidence, to submit rebuttal evidence, and to conduct cross-examination of witnesses. Licensee voluntarily and knowingly agrees to waive all possible substantive and procedural motions and defenses that could be raised if an administrative hearing were held.

7. All **CONFIDENTIAL** materials in **CONFIDENTIAL** regarding Licensee were fully reviewed and considered by the Board members who serve on the Board's Disciplinary

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Panel No. 38. Disciplinary Panel No. 38 authorized and directed Board counsel to seek settlement of this matter with the provisions contained in this Consent Order.

8. As set forth in K.S.A. 65-2838(b) and K.S.A. 77-505, the Board has authority to enter into this Consent Order without the necessity of proceeding to a formal hearing.

9. The terms and conditions of the Consent Order are entered into between the undersigned parties and are submitted for the purpose of allowing these terms and conditions to become a lawful Order of the Board.

10. This Consent Order shall not be binding on the Board until an authorized signature is affixed at the end of this document. Licensee specifically acknowledges that counsel for the Panel is not authorized to sign this Consent Order on behalf of the Board.

11. The Board is the sole and exclusive administrative agency in the State of Kansas authorized to regulate the practice of athletic training. K.S.A. 65-6901 *et seq.*

12. The Kansas Athletic Trainers Licensure Act is constitutional on its face and as applied in this case. Licensee agrees that in considering this matter, the Board is not acting beyond its jurisdiction as provided by law.

13. Licensee hereby releases the Board, its individual members (in their official and personal capacity), attorneys, employees, and agents (collectively, "Releasees"), from any and all claims including, but not limited to, those alleged damages, actions, liabilities, both administrative and civil, including the Kansas Judicial Review Act, K.S.A. 77-601 *et seq.*, arising out of the investigation and acts leading to the execution of this Consent Order. This release shall forever discharge the Releasees of any and all claims or demands of every kind and nature that Licensee

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has claimed to have had at the time of this release or might have had, either known or unknown, suspected or unsuspected, and Licensee shall not commence to prosecute, cause, or permit to be prosecuted, any action or proceeding of any description against the Releasees.

14. This Consent Order, when signed by both parties, constitutes the entire agreement between the parties, and may only be modified or amended by a subsequent document executed in the same manner by the parties.

15. Nothing in this Consent Order shall be construed to deny the Board jurisdiction to investigate alleged violations of Kansas Athletic Trainers Licensure Act, K.S.A. 65-6901 *et seq.*, or to investigate complaints received under Risk Management Laws, K.S.A. 65-4921 *et seq.*, that are known or unknown and are not covered under this Consent Order, or to initiate formal proceedings based upon known or unknown allegations of violation of the Kansas Healing Arts Act.

16. Licensee acknowledges he has read this Consent Order and fully understands the contents.

17. Licensee acknowledges that this Consent Order has been entered into freely and voluntarily.

18. Licensee further understands and agrees that upon adoption this document shall be deemed a public record and shall be reported to any entities authorized to receive disclosure of the Consent Order.

19. Licensee agrees that all information maintained by the Board pertaining to the nature and result of any complaint and/or investigation may be fully disclosed to and considered

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by the Board in conjunction with the presentation of any offer of settlement, even if Licensee is not present. Licensee further acknowledges that the Board may conduct further inquiry as it deems necessary before the complete or partial acceptance or rejection of any offer of settlement.

20. Licensee, by signature to this document, waives any objection to the participation of the Board members, including the Disciplinary Panel and General Counsel, in the consideration of this offer of settlement and agrees not to seek the disqualification or recusal of any Board member or General Counsel in any future proceedings on the basis that the Board member or General Counsel has received investigative information from any source which otherwise may not be admissible or admitted as evidence.

21. The Board may consider all aspects of this Consent Order in any future matter regarding Licensee.

22. Upon execution of this Consent Order by affixing a Board authorized signature below the provisions of this Consent Order shall become an Order under K.S.A. 65-2838. This Consent Order shall constitute the Board's Order when filed with the office of the Executive Director for the Board and no further Order is required.

23. This Consent Order constitutes **public disciplinary action**.

SURRENDER OF LICENSE TO PRACTICE ATHLETIC TRAINING

24. In lieu of conducting a formal proceeding, **Licensee, by signature affixed to this Consent Order, hereby voluntarily agrees to surrender his Kansas license to practice as an athletic trainer**. Such surrender will be treated as a revocation for all purposes, including reporting.

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25. Licensee agrees that an application for reinstatement of the license will be considered in accordance with the provisions of K.S.A. 65-2844. Further, Licensee's application will be governed by *Vakas v. The Kansas Board of Healing Arts*, 248 Kan. 589 (Kan. 1991), and all applicable statutes, law, rules and regulations regarding qualifications for licensure and reinstatement.

26. Licensee agrees that in the event he applies for reinstatement of his license, the allegations contained in this Consent Order will be considered as findings of fact and conclusions of law.

27. Approving the proposed Consent Order will resolve **CONFIDENTIAL** CONFIDENTIAL without the need for litigation, thereby promoting judicial efficacy and making good use of limited resources. Furthermore, approving the proposed Consent Order will further the Board's mission of protecting the public against the unprofessional, improper, unauthorized, and unqualified practice of the healing arts by immediately removing Licensee's authority to practice as an athletic trainer in Kansas.

28. Licensee shall obey all federal, state and local laws and rules governing the practice of athletic training in Kansas which may be in place at the time of execution of this Consent Order or may become effective after the execution of this document.

IT IS THEREFORE ORDERED that this Consent Order and agreement of the parties contained herein is hereby adopted by the Board as findings of fact, conclusions of law, and as a Final Order of the Board.

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IT IF FURTHER ORDERED that Licensee's license to practice athletic training in Kansas, License No. 24-00498, is hereby REVOKED.

IT IS SO ORDERED on this 24th day of FEBRUARY, 2025. 2026

FOR THE KANSAS STATE
BOARD OF HEALING ARTS:

Susan Hill

2/24/2026

Date

Signed by:

Jeremy Goates

20417C442CA04CC...

Jeremy A. Goates, A.T.
Licensee

12/5/2025

Date

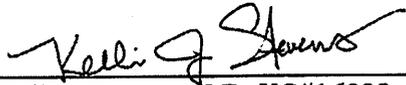
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PREPARED BY:

/s/ Caitlin A. Kremer

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APPROVED BY:



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Attorney for Licensee

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CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the **CONSENT ORDER** by () placing the same in the U.S. mail, postage prepaid, () facsimile to the phone numbers listed below, and that the transmission was reported as complete and without error and that the facsimile machine complied with Supreme Court Rule 119(b)(3), or () hand delivery, on this the 24th day of FEBRUARY, ²⁰²⁶ 2025, to the following:

Jeremy Goates, A.T.
CONFIDENTIAL

Licensee

Kelli J. Stevens, J.D. KS#16032
Stevens Law, LLC
8400 W. 110th Street, Suite 325
Overland Park, KS 66210
kstevens@stevenslawllc.com
Attorney for Licensee

With a copy hand-delivered to:

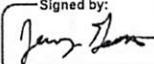
Caitlin A. Kremer, J.D. KS#30407
Associate Litigation Counsel
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Licensing Administrator
Kansas State Board of Healing Arts
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And the original was hand-filed with:

Office of the Executive Director
Kansas Board of Healing Arts
800 SW Jackson, Lower Level – Suite A
Topeka, Kansas 66612

Signed by:

20417C442CA04CC...
Staff Member

Y. Goates

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