

DEC 19 2025 ⁴⁹

KS State Board of Healing Arts

**BEFORE THE BOARD OF HEALING ARTS
OF THE STATE OF KANSAS**

In the Matter of)

Jacqueline M. Youtsos, M.D.)
Kansas License No. 04-38483)

Docket No. 26-HA00019

**EMERGENCY ORDER OF SUSPENSION AND
EMERGENCY PROCEEDINGS**

This matter came before Presiding Officer, Dr. Tom Estep, M.D., on the: (1) Petition; and (2) Motion for *Ex Parte* Emergency Order of Suspension ("Motion") filed on behalf of Disciplinary Panel #40 of the Kansas State Board of Healing Arts ("Board" or "Petitioner") in the captioned matter. Upon consideration of the entire agency record, including all filings and attached exhibits, the Presiding Officer finds, concludes, and orders as follows:

Findings of Fact

1. Licensee is licensed to practice medicine and surgery in the state of Kansas, having been issued License No. 04-38483 on or about September 24, 2015, and having last renewed such license on May 29, 2025. Licensee's current license status is Active.
Petition, p. 1.
2. On December 18, 2025, the Board issued a Qualified Protective Order ("QPO") regarding use and disclosure of protected health information that is confidential under federal or state law. The QPO remains in effect for the duration of this proceeding and any appeals.
3. Pursuant to K.S.A. 65-2836, K.S.A. 65-2838(c), and K.S.A. 77-536, there is reasonable cause to believe:

- a. grounds exist for disciplinary action; and
 - b. the immediate continuation in practice by Jacqueline M. Youtsos, M.D. ("Licensee" or "Respondent"), would constitute an imminent danger to the public health and safety.
4. The cause to believe that grounds exist for disciplinary action and the Licensee's immediate continuation in practice would constitute an imminent danger to the public health and safety include the following:
- a. The facts set forth and incorporated in the (1) Petition; and (2) Motion for *Ex Parte* Emergency Order of Suspension ("Motion") filed in this matter are all incorporated here by reference.
 - b. Licensee is board certified in Family Medicine and actively practices **CONFIDENTIAL** **CONFIDENTIAL** focusing on dermatology and skin treatment. Motion Ex. 11.
 - c. In early May 2024, a 67 year old female ("Patient 1") sought Licensee's medical care and treatment for wrinkles and increased skin laxity. A plan was developed for Patient 1 to have multiple cosmetic procedures completed between May and June 2024. Motion Exhibits 1-4.
 - d. On May 10, 2024, Patient 1 had the first procedure, an autologous fat transfer treatment with a noted plan of liposuction and fat grafting. At that time Patient 1's weight was recorded as being 124 lbs. Anesthesia documented for this procedure was "local anesthesia and TIVA" and "Tumescent anesthesia (1000mg lidocaine/1 Liter saline) was prepared and warmed. X 1 liter." Licensee documented within her description of the procedure that "[t]otal tumescent anesthesia volume was 1000 cc." Motion Exhibit 2.
 - e. On May 24, 2024, Patient 1 had an additional cosmetic procedure with Licensee for skin laxity and Licensee performed a cosmetic excision of epigastric skin. Anesthesia was documented as "local infiltration-1% lidocaine with epinephrine (40 cc)" and it was noted that "25cc of lidocaine 1% with epi were placed in each arm without complication." Patient 1's weight was not documented in the May 24, 2025, visit note. Motion Exhibit 8.
 - f. On June 25, 2024, Patient 1 was seen by Licensee for a thigh lift treatment to address skin laxity. Patient 1's weight was documented as "approximately 120-125." For anesthesia, Licensee documented using "Xylocaine 1% with epi – (lot number **CONFIDENTIAL**) – exp 10/25) – local numbing medication was

infiltrated between both legs.” Licensee documented that approximately 300cc of lidocaine 1% with epi was utilized. The procedure start time was approximately 8:45 am. Licensee and Licensee’s medical assistant performed the lidocaine (Xylocaine) injections on Patient 1. At approximately 8:57 am Patient 1 stated she was feeling nauseous. At approximately 9:00 am Patient 1 became unresponsive, 911 was called, and EMS arrived at 9:10 am. Patient 1 had a seizure lasting approximately 5 seconds and thereafter was transferred by ambulance to **CONFIDENTIAL** Motion Exhibits 5, 11, and 12.

- g. The ER physician at **CONFIDENTIAL** saw Patient 1 at 9:25 am on June 25, 2024, for the chief complaint of “code blue.” EMS reported Patient 1’s pulse stopped upon arrival and CPR was started. Licensee called the **CONFIDENTIAL** ER physician just prior to Patient 1’s arrival and stated the Patient 1 had been injected with 400mL of 1% lidocaine with epi for local anesthesia. Motion Exhibit 13.
- h. **CONFIDENTIAL** ER staff ultimately stabilized Patient 1 during the June 25, 2024, visit. Shortly after Patient 1 stabilized, Licensee spoke with the **CONFIDENTIAL** ER physician a second time indicating she misspoke about the amount of lidocaine used and indicated Patient 1 received “no more than 300ml.” Licensee thereafter spoke with the **CONFIDENTIAL** ER physician a 3rd time to again clarify the lidocaine administration stating Patient 1 “received a total of 210ml of 1% lidocaine with epinephrin for the procedure,” and further noted Patient 1 had received 200ml of lidocaine in the past for procedures on her arms with no complications. Motion Exhibit 13, 17.
- i. **CONFIDENTIAL** ER physician documented that Patient 1 likely had lidocaine toxicity “as she is quite petite at 60 kg.” Exhibit 13. **CONFIDENTIAL** pharmacy staff provided assistance in lipid emulsion dosing to counteract lidocaine toxicity. Exhibit 13, p. 7. Patient 1 was noted to have “probable neurotoxicity and then cardiotoxicity likely due to lidocaine”. *Id.* On June 25, 2024, Patient 1 was ultimately transferred to **CONFIDENTIAL** for lidocaine toxicity, post cardiac arrest, and seizure. Motion Exhibits 14-15.
- j. Patient 1 ultimately died on July 1, 2024, with her cause of death documented as lidocaine toxicity from anesthesia during medical procedure. Motion Exhibit 15.
- k. 1% lidocaine is a concentration of 10mg/ml. Motion Exhibit 18. During Licensee’s communication with the **CONFIDENTIAL** ER physician, Licensee never indicated the lidocaine administered to Patient 1 on June 25, 2024, was diluted. *Id.*

Statement of Law

K.S.A. 65-2836. A licensee's license may be revoked, suspended or limited, or the licensee may be publicly censured or placed under probationary conditions, or an application for a license or for reinstatement of a license may be denied upon a finding of the existence of any of the following grounds:

(b) The licensee has committed an act of unprofessional or dishonorable conduct or professional incompetency, except that the board may take appropriate disciplinary action or enter into a non-disciplinary resolution when a licensee has engaged in any conduct or professional practice on a single occasion that, if continued, would reasonably be expected to constitute an inability to practice the healing arts with reasonable skill and safety to patients or unprofessional conduct as defined in K.S.A. 65-2837, and amendments thereto.

(k) The licensee has violated any lawful rule and regulation promulgated by the board or violated any lawful order or directive of the board previously entered by the board.

K.S.A. 65-2837(a) defines professional incompetency as follows:

(1) One or more instances involving failure to adhere to the applicable standard of care to a degree that constitutes gross negligence, as determined by the board.

(2) Repeated instances involving failure to adhere to the applicable standard of care to a degree that constitutes ordinary negligence, as determined by the board.

(3) A pattern of practice or other behavior that demonstrates a manifest incapacity or incompetence to practice the healing arts.

Pursuant to K.A.R. 100-25-1(b), local anesthesia shall include lidocaine injections not exceeding seven milligrams per kilogram (7mg/kg) of body weight and also tumescent local anesthesia.

K.S.A. 65-2838(c). The board may temporarily suspend or temporarily limit the license, registration, permit or certificate of any licensee, registrant, permit holder or certificate holder in accordance with the emergency adjudicative proceedings under the Kansas administrative

procedure act if the board determines that there is cause to believe that grounds exist for disciplinary action authorized by the applicable practice act against the person and that the person's continuation in practice would constitute an imminent danger to the public health and safety.

K.S.A. 77-536(a). A state agency may use emergency proceedings: (1) In a situation involving an immediate danger to the public health, safety or welfare requiring immediate state agency action or (2) as otherwise provided by law.

K.S.A. 77-536(b). The state agency may take only such action as is necessary: (1) To prevent or avoid the immediate danger to the public health, safety or welfare that justifies use of emergency adjudication or (2) to remedy a situation for which use of emergency adjudication is otherwise provided by law.

Conclusions of Law

As required by K.S.A. 65-2838(c), there is reasonable cause to believe: (1) grounds exist for disciplinary action against Licensee for violation of K.S.A. 65-2836(b) and (k), and K.A.R. 100-25-1(b). There is reasonable cause to believe Licensee has committed one or more acts of professional incompetence related to Patient 1 and Licensee's management of anesthesia and lidocaine administration exceeded the lidocaine dosing limitations imposed under K.A.R. 100-25-1(b) of no more than seven milligrams per kilogram (7mg/kg) of body weight, the limits of which would equate to 420mg based on Patient 1's 60kg weight measurement at ^{CONFIDENTIAL}. For purposes of the June 25, 2024, procedure at issue, by Licensee's own account, she indicated an administration of at least 210ml which at 10mg/ml would equate to 2,100 mg, more than four times the dose allowed by K.A.R. 100-25-1(b).

As required by K.S.A. 65-2838(c), there is reasonable cause to believe Licensee's immediate continuation in practice would constitute an imminent danger to the public health and safety given Licensee's practice of administering lidocaine well above the acceptable dose to Patient 1, Licensee's conflicting documentation and statements related to the volume of lidocaine administered to her patient, combined with Licensee's lack of documentation and apparent understanding of the importance of calculating a lidocaine dose based on the weight of a patient. Continuation of such practice methods would constitute an imminent danger to future patients.

The Presiding Officer further finds that, in addition to the facts and law referenced above, the policy considerations of the Board's purpose and duty of public protection (K.S.A. 65-2801) provide supplemental reasonable grounds in law and policy to justify the emergency suspension under the circumstances of this case.

Therefore, pursuant to K.S.A. 65-2801 et seq., K.S.A. 65-2836, K.S.A. 65-2838, and K.S.A. 77-536, Licensee's Kansas license to practice medicine and surgery is immediately temporarily suspended pending further proceedings and/or further Order of the Board.

IT IS, THEREFORE, ORDERED that the Kansas active license to practice medicine and surgery of Jacqueline M. Youtsos, M.D., is hereby immediately **SUSPENDED** as described above on a temporary basis pending further proceedings and/or further Order of the Board.

IT IS SO ORDERED this 19th day of December 2025.

FOR THE KANSAS STATE BOARD OF HEALING ARTS

/s/ Bradley Taylor, #28946, Deputy General Counsel, KSBHA, for
Tom Estep, M.D., Presiding Officer

CERTIFICATE OF SERVICE

I certify that a true copy of the foregoing was served this 19th day of December 2025, by depositing the same in the United States Mail, first-class postage prepaid, and via email addressed to:

Jacqueline M. Youtsos, M.D.

CONFIDENTIAL

Licensee

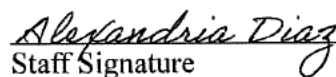
Kelli Stevens, #16032
Stevens Doffing, LLC
8400 110th Street Suite 325
Overland Park, KS 66210
Ph: 913-633-1163
kstevens@stevenslawllc.com
Attorney for Licensee

A copy was hand delivered to:

C. Sebastian Thomas Orosco, KS# 24605
Deputy Litigation Counsel
Kansas Board of Healing Arts
800 SW Jackson St., Suite 700
Topeka, KS 66612
Ph: (785) 296-4421
Fx: (785) 368-7103
Sebastian.Orosco@ks.gov

Licensing Administrator
Kansas State Board of Healing Arts
800 SW Jackson St., Suite 700
Topeka, KS 66612

and the original filed with the office of the Executive Director.


Staff Signature