

SUPREME COURT OF THE STATE OF KANSAS

In re Janoski

Janoski · No. 124,955 · Decided May 8, 2026

SUMMARY

The Kansas Supreme Court denied Jason Michael Janoski's motion as moot. The court concluded that the conditions and limitations imposed on his law practice upon reinstatement automatically expired after one year, unlike probation conditions that require a formal discharge.

CASE DETAILS

COURT	Supreme Court of the State of Kansas
JURISDICTION	Supreme Court of the State of Kansas
DECIDED	May 8, 2026
DOCKET	124,955
DISPOSITION	dismissed
PROCEDURAL POSTURE	Janoski, whose Kansas law license had been reinstated subject to one year of practice conditions and limitations, moved for an order acknowledging that those conditions had expired. The Office of the Disciplinary Administrator did not object.
PRECEDENTIAL VALUE	Published order
PARTIES	Jason Michael Janoski v. Office of the Disciplinary Administrator

TOPICS

- mootness
- appellate procedure
- civil procedure

PRACTICE AREAS

- legal ethics
- attorney discipline
- appellate procedure

QUESTIONS PRESENTED

- Whether the court should grant Janoski's motion for an order acknowledging that the conditions and limitations imposed on his reinstated law license had expired.
- Whether conditions and limitations imposed as part of reinstatement remain in effect after the one-year period absent a separate court order.

HOLDINGS

1. Conditions and limitations imposed when an attorney's license is reinstated to active status automatically expire at the end of the specified one-year period; unlike probation, they do not remain in effect until the Supreme Court separately discharges the attorney.
2. The motion is moot and must be denied because the conditions and limitations had automatically expired at the end of the one-year period.

KEY QUOTATIONS

“respondent remains on probation, subject to each condition of probation, until the Supreme Court discharges the respondent from probation, regardless of whether the ordered term of probation has expired.” (at 1)

“Accordingly, the court denies Janoski's motion as moot because the conditions and limitations on his practice of law automatically expired at the end of the one-year period.” (at 1)

FACTUAL BACKGROUND

The Supreme Court of Kansas reinstated Jason Michael Janoski's law license to active status on March 11, 2025, while imposing conditions and limitations on his practice for one year. After that period ended, Janoski moved for an order acknowledging expiration of the conditions, and the Office of the Disciplinary Administrator confirmed his compliance and expressed no objection.

PROCEDURAL HISTORY

On March 11, 2025, the court reinstated Janoski's law license to active status subject to conditions and limitations for one year. After the one-year period elapsed, Janoski filed a motion seeking acknowledgment that the conditions had expired. The Office of the Disciplinary Administrator reported compliance and stated that it had no objection. The court denied the motion as moot because the conditions had automatically expired.

DISPOSITION

dismissed

CASES CITED

- In re Janoski, 320 Kan. 255, 256-57, 564 P.3d 1273 (2025)
- In re Shaw, 317 Kan. 546, 546-47, 533 P.3d 311 (2023)

OPINION

PER CURIAM.

IN THE SUPREME COURT OF THE STATE OF KANSAS No. 124,955 In the Matter of JASON MICHAEL JANOSKI, Respondent. ORDER On March 11, 2025, the court reinstated Jason Michael Janoski's Kansas law license to active status. At that time, the court imposed conditions and limitations on Janoski's practice of law for one year.

In re Janoski, 320 Kan. 255, 256-57, 564 P.3d 1273 (2025). On April 21, 2026, Janoski filed a motion asking the court for an order acknowledging that his practice conditions and limitations have now expired. The Office of the Disciplinary Administrator (ODA) responded that Janoski complied with all imposed conditions and that it has no objection to Janoski's motion.

As the ODA noted in its response, the court explained in its order of reinstatement that there are different procedures when the court places a respondent on probation as a form of discipline and when the court reinstates an attorney's law license to active status with conditions or limitations. Janoski, 320 Kan. at 255-56; see In re Shaw, 317 Kan. 546, 546-47, 533 P.3d 311 (2023).

Supreme Court Rule 227(g)-(i) (2026 Kan. S. Ct. R. at 283) governs the procedure for a respondent on probation. Rule 227(h) states that a "respondent remains on probation, subject to each condition of probation, until the Supreme Court discharges the respondent from probation, regardless of whether the ordered term of probation has expired." No corresponding provision exists under the rule governing reinstatement.

See Supreme Court Rule 232 (2026 Kan. S. Ct. R. at 292). 1 Accordingly, the court denies Janoski's motion as moot because the conditions and limitations on his practice of law automatically expired at the end of the one-year period.

The court directs the Reporter of Decisions to publish this order in the Kansas Reports. Dated this 8th day of May 2026. 2