

Kant, Boundary Violations, and Counseling Ethics

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Abstract: In a recent ongoing investigation, Dr. Scott Owen of Provo, Utah, pleaded guilty to sexually abusing many of his clients. On top of permanently losing his counseling license, Owen received a 15-year sentence. According to the testimony, several young men who were members of the Church of Jesus Christ of the Latter Day Saints (LDS) were sent to Owen for Conversion Therapy. During the counseling sessions, many young men testified that Owen sexually abused them by touching them inappropriately amounting to what is called boundary violations. Using Immanuel Kant's second formula of the Categorical Imperative, The Formula of the End in Itself, I will argue that Owen failed to protect and enhance his client's autonomy and rational decision-making process, he violated the dignity of his clients, and breached the value of informed consent.

Key words: Immanuel Kant, Categorical Imperative, The Formula of the End in Itself, Autonomy, Rational decision-making, Dignity, Informed consent

Introduction

In a recent ongoing investigation, Dr. Scott Owen of Provo, Utah, pleaded guilty to sexually abusing many of his clients.¹ On top of permanently losing his counseling license, Owen received a 15-year sentence. According to the testimony, several young men who were members of the Church of Jesus Christ of the Latter Day Saints (LDS) were sent to Owen for Conversion Therapy. During the counseling sessions, many young men testified that Owen sexually abused them by touching them inappropriately amounting to what is called boundary violations.

In this paper, I plan to discuss this case using Immanuel Kant's Categori-

¹ Deepnewz.com, April 4, 2025. Former Provo Therapist Scott Owen Sentenced to 15 Years to Life for Sexual Abuse of Clients, Including Teenage Girl. [Accessed: 2026-4-27] Available at: <https://deepnewz.com/crime/former-provo-therapist-scott-owen-sentenced-to-15-years-to-life-sexual-abuse-7139dfc4>.

cal Imperative, in particularly, Kant's second formula, the Formula of the End in Itself. Using the second formula, I will argue that Owen failed to protect and enhance his client's autonomy and rational decision-making process, he violated the dignity of his clients, and he breached the value of informed consent.

Boundary Violations in a Counseling Session

The current version of the *Ethical Principles of Psychologists and Code of Conduct* prohibits "sexual intimacies" with current patients or clients.² In particular, the norm is described as one of the few absolute standards of the APA: "Psychologists do not engage in sexual intimacies with current therapy/patients."³ It is worded this way to eliminate any doubt about the exclusion of any exceptions for such an action. Additionally, this standard cannot be circumvented by ending the therapeutic relationship.

Cambell, et al. also illustrates the status of the rule against sexual interaction between therapists and their clients at the state level. They reason that every psychologist knows that such an action is prohibited because "every state prohibits sexual intimacies through state licensing laws that either incorporate the Ethics Code or include this prohibition separately."⁴ Moreover, in addition to the state licensing laws, some states (not all states) have taken measures to criminalize such a psychological/client relationships and some states have "mandated reporting requirements."⁵ However, Campbell, et al. comment that even though the wrongness of this action is nearly ubiquitous, some therapists continue to pursue intimate relationships with their clients.

Dr. Scott Owen's Case

Dr. Scott Owen received his Masters and Doctoral degrees in Counseling Psychology from Brigham Young University and was a licensed therapist. Owen specialized in the treatment of, among other things, pornography ad-

² Steinberg, A. (Lu). – Alpert, J. L. – Courtois, Ch., eds., 2021. *Sexual Boundary Violations in Psychotherapy: Facing Therapist Indiscretions, Transgressions, and Misconduct*. American Psychological Association. (electronic edition).

³ Campbell, L., Knauss, L., Meaux, L., 2021. The American Psychological Association Ethics Code and Legal Statutes Regarding Sexual Boundary Violations: History and Current Status. In: Steinberg, A. (Lu). – Alpert, J. L. – Courtois, Ch., eds. *Sexual Boundary Violations in Psychotherapy: Facing Therapist Indiscretions, Transgressions, and Misconduct*. American Psychological Association. (electronic edition), p. 30.

⁴ Ibid., p. 32.

⁵ Ibid.

diction, sexual addictions, and Conversion Therapy for same-gender attraction. Of the latter issue, Owen developed a reputation, over a 20-year career, for applying Conversion Therapy to young gay men who were members of LDS.⁶ LDS doctrine teaches that the highest level of heaven is reserved for heterosexual married couples.⁷ Owen was himself a long-term member and officer of the LDS.

After Owen was arrested on Nov. 8, 2023, he permanently lost his license for the violation of Standards 10.05, Sexual Intimacies with Current Therapy Clients/Patients of the *Ethical Principles of Psychologists and Code of Conduct*. Prior to that, as early as 2016, after numerous allegations by many of Owen's clients (which were ignored by the LDS), Owen voluntarily surrendered his license to the state in 2018 without any admission to guilt.⁸ In 2025, Owen was sentenced to prison for 15 years to life.

The details of Owen's case are numerous and complicated. Even though this may be true, the evidence which emerged from Owen's case and which Owen's confession confirms, illuminates a morally egregious and premeditated sexual endeavor. According to the allegations, Owen would initially assure his clients that to overcome homosexuality, "touching" within a counseling context was key to helping his client's heal and learn how to accept intimacy and grow closer to God.⁹ Although such "touching" is morally suspicious, it serves as the underlying reason for Owen's sexual grooming of his clients.

According to the testimony of Owen's victims, the touching would begin with seemingly innocent embraces at the end of the counseling sessions. As the sessions would continue, "touching" during the counseling sessions would take on a surreptitious manner. As the trust of the client grew, Owen would introduce more invasive contact. He would encourage his clients to undress, at other times there would be "make out sessions," which would include cuddling, kissing, touching in the genital areas, mutual masturbation, and so forth.¹⁰ In the end, Owen pleaded guilty to three charges, admitting he sexually abused his patient who sought his help because of same-sex desires and Latter-day Saints faith.¹¹

⁶ Schreifels, J., The Salt Lake Tribune, 2025. *Utah Ex-Therapist Scott Owen Sentenced to Prison for Sexually Abusing Patients*. [Accessed: 2026-4-27]. Available at: <https://www.propublica.org/article/scott-owen-utah-therapist-sexual-abuse-prison-sentence>.

⁷ Ibid.

⁸ Ibid.

⁹ Ibid.

¹⁰ Ibid.

¹¹ Ibid. It is estimated that Owen's had sexual contact with hundreds of clients.

Kant and the Formula of the End in Itself

I will now discuss Immanuel Kant's second Categorical Formula, the Formula of the End in Itself. First, I will briefly discuss what it means and how Kant applies it. After that, I will apply it to three issues that emerge in Dr. Scott Owen's case. To wit, I will direct Kant's formula to the ethical issues of client manipulation, respect for client dignity, and client informed consent.

Kant spells out the second formula of the Categorical Imperative in the following way: "*So act that you use humanity, in your own person as well as in the person of any other, always at the same time as an end, never merely as a means.*"¹² Two points are required to understand (at least partially) Kant's second formula, viz., what is the meaning of the phrase "never merely as a means"? Additionally, what does the term "end" mean? I will begin with the former.

According to Kant's text, to treat a person "merely as a means" refers to the treatment of a person in an arbitrary manner.¹³ Although there are a number of definitions associated with the meaning of the term "arbitrary," at the time of the publication of the *Grounding for the Metaphysics of Morals*, the most relevant definition for this discussion is this: "Unrestrained in the exercise of will; of uncontrolled power or authority, absolute; hence, despotic, tyrannical."¹⁴ Thus, if a person P_1 treats another person P_2 *as merely a means*, then P_1 exerts a kind of despotic or repressive control over P_2 . With this clarification in place, it makes sense that, according to Kant, such treatment between two equal individuals is unqualifiedly impermissible.

Before I discuss the term "end," one point of clarification is needed. To treat someone as *merely a means* does not rule out treating someone *as a means*. For example, to treat a person as a means is "to recognize the instrumental value an individual may possess within a specific context in-

¹² Kant, I., 2011. *Groundwork of the Metaphysics of Morals: A German-English Edition*, Timmermann, J. – Gregor, M., eds. and trans. Cambridge: Cambridge University Press, p. 87. Italics are in the German text and the English translation. The German text is from the second original edition published in 1786.

¹³ The Timmermann and Gregor edition translates "zum beliebigen Gebrauche" as "discretionary use." Ibid., p. 85. The literal translation of the German is "for any use." I prefer the translation "arbitrary use." The latter translation picks up the spirit of the phrase "merely as a means." Additionally, this is the translation used by Ellington, J. W., 1994. In: Kant, I. *Ethical Philosophy*, 2nd ed., James W. Ellington, trans. Indianapolis and Cambridge: Hackett Publishing Co., p. 35.

¹⁴ Oxford English Dictionary, 2026. "arbitrary (adj.), sense 3". [Accessed: 2026-5-27] Available at: <https://doi.org/10.1093/OED/6870915598>.

cluding the goals and projects that may be tied to the instrumental value.”¹⁵ For example, suppose I set the goal to build a deck outside of my house. Unfortunately, I lack the skill to satisfy my goal. Consequently, it occurs to me that, if I want to satisfy my goal, it may be in my interest to hire an individual who is qualified to build decks, i.e., an individual whose goals and projects may be tied to the qualifications they possess. So, my goal may be attained by hiring and paying an individual whose goal is to realize his own goals and projects and my project at the same time.

However, here is an important point to underscore. To treat someone *merely as a means* not only recognizes the instrumental value an individual may possess, but it also involves taking advantage of their instrumental value. Such an action is particularly egregious when the treatment takes advantage of their instrumental value by trumping up unfounded complaints about the craftsmanship of the deck. Thus, such an unfounded response treats the deck-builder as merely a means.

I will now turn to the latter question: From Kant’s point of view, what does it mean to call a person “an end”? The meaning of the word “end” is elusive in many ways. It echoes the ancient Greek term “τέλος” (telos), which means “*the fulfilment or completion of anything*” or “*the end proposed of an action, chief good of an action.*”¹⁶ Unfortunately, a teleological understanding of the term resists Kant’s own rejection of teleology.¹⁷ Thus, the meaning of “end” must point to a different meaning even if the meaning may seem similar. Here’s what I mean.

The word “end” occurs twice in Kant’s German text:

Nun sage ich: der Mensch und überhaupt jedes vernünftige Wesen, *existirt als Zweck an sich selbst, nicht bloß als Mittel* zum beliebigen Gebrauche für diesen oder jenen Willen, sondern muß in allen seinen, sowol auf sich selbst, als auch auf andere vernünftige Wesen gerichteten Handlungen, jederzeit *zugleich als Zweck* betrachtet werden.

This is translated:

¹⁵ Zinaich, Jr., S., 2024. *A Contemporary Introduction to Professional Ethics*, 2nd ed. Dubuque, IA: Kendall Hunt Publishing Company, p. 39.

¹⁶ Perseus Digital Library, 2026. “τέλος” (telos) [Accessed: 2026-5-27]. Available at: <https://www.perseus.tufts.edu/hopper/morph?l=telos&la=greek#lexicon>.

¹⁷ Korsgaard, Ch. M., 2012. Introduction. In: Gregor, M. – Timmermann, J. – Korsgaard, Ch. M., eds., 2012. *Kant: Groundwork of the Metaphysics of Morals*. Cambridge: Cambridge University Press, p. xxii.

Now I say: a human being and generally every rational being *exists* as an end in itself, *not merely as a means* for the discretionary use for this or that will, but must in all its actions, whether directed towards itself or also to other rational beings, always be considered *at the same time as an end*.¹⁸ The German term, which is normally translated as “end,” is “*Zweck*.” “*Zweck*” also means “purpose” or “point.”¹⁹

If this is so, what insight, if any, does this help with the meaning of “end”?

One way to understand the German term “*Zweck*” and a way which is consistent with the text above, points to the idea that rational beings are inherently purposive beings. This is to say that rational beings represent fundamentally and intrinsically (loci) sources of goals and projects. From this perspective, if it is indeed what Kant means, rational beings—humans, spirits, as well as God—possess absolute (or unconditional) value in virtue of being essentially fountains of rational purposive activity. Additionally, directly after the quote above, Kant writes the following: “All objects of inclinations have a conditional worth only; for if the inclinations, and the needs founded on them, did not exist, their object would be without worth. [...] Therefore the worth of any object to be acquired by our action is always conditional.”²⁰ Here’s what I make of this qualification. There are two issues I want to underscore, the role of inclinations and the creation of value. I will begin with the former.

The meaning of “inclination” has historically pointed to a tendency or disposition to behave, think, or feel in a particular way. It is a readiness or willingness to do something. It can also mean a preference for a person, party, proposal, a leaning, or a bias.²¹ Although not strictly an emotion, like an emotion, an inclination typically has an intention of an object it fixates on.²² The attention of the inclination is triggered by the goals or projects antecedent to the inclination. Thus, inclinations represent a set of purposive behaviors. But something else occurs. According to Kant, we

¹⁸ Kant, I., 2011. *Groundwork of the Metaphysics of Morals: A German-English Edition*, *ibid.*, p. 84–85. Italics are in the German text and the English translation.

¹⁹ Cambridge Dictionary, 2026. “*Zweck*”. [Accessed: 2026-5-27]. Available at: <https://dictionary.cambridge.org/dictionary/german-english/zweck?q=Zweck>.

²⁰ Kant, I., 2011. *Groundwork of the Metaphysics of Morals: A German-English Edition*, *ibid.*, p. 85.

²¹ Oxford English Dictionary, 2026. “inclination (n.), sense I.1.a.”. [Accessed: 2026-5-27]. Available at: <https://doi.org/10.1093/OED/1175030405>.

²² Here I am following Elliot D. Cohen’s view of the intentionality of emotions to understand the notion of an inclination. See Cohen, E. D., 2022. *Cognitive-Behavior Interventions for Self-Defeating Thoughts*. New York: Routledge, p. 16. More work is needed to chisel out more precisely the notion of “inclination.”

add value to any object of our inclinations, value it did not have prior to our intentional inclination. Following Cohen here again, another way to put this, e.g., like emotions, an individual's inclinations rate or evaluate the intentional objects of the inclinations.²³ Thus, some of these intentional ratings may contain some sort of positive or negative value about the object, i.e., value (or disvalue) which is conditional in the sense that its value (or disvalue) temporarily serves a personal purpose.

Kant on Making a Lying Promise

Although I have partially and briefly discussed Kant's second formula, it may be useful to explain how he applies it to an other-regarding strict duty. Of this duty, Kant writes:

Secondly, as far as necessary or owed duty to others is concerned, someone who has it in mind to make a lying promise to others will see at once that he wants to make use of another human being *merely as a means*, who does not at the same time contain in himself the end. For the one I want to use for my purposes by such a promise cannot possibly agree to my way of proceeding with him and thus himself contain the end of this action.²⁴

In this situation, an individual, P_1 , plans to make a lying promise to another individual, P_2 . Although Kant does not explicitly state what instrument value P_2 possesses that P_1 desires to exploit,²⁵ Kant nevertheless remarks that P_1 will understand the following intuition: because of the lying promise he intends to exploit P_2 with, P_1 understands that the goal he intends to pursue is not the same goal P_2 thinks he will attain. The reason is that if P_2 understood what P_1 was going to do, P_2 would immediately object to P_1 's plan and goal. This is to say that P_2 would not assent to be treated merely as a means.

The Formula of the End in Itself and Counselor Boundary Violations

Scott Owen's case illustrates serious boundary violations between a counse-

²³ Ibid., p. 17.

²⁴ Kant, I., 2011. *Groundwork of the Metaphysics of Morals: A German-English Edition*, *ibid.*, p. 89.

²⁵ Kant does state that the examples he uses to illustrate the Second Formula of the Categorical Imperative are in keeping with the previous examples he used to spell out the meaning of the First Formula of the Categorical Imperative. In the First Formula he puts in place a case where someone needs to borrow money but has no intention of paying back. *Ibid.*, p. 87. With this in mind though, Kant does not explicitly mention the same case.

lor and a client. In this last section, I intend to discuss three obvious abuses: client manipulation, infringement of client dignity, and the breach of informed consent.

Client Manipulation

Owen's approach to counseling and to his clients employed the use of manipulation. By "manipulation" I follow Beauchamp and Childress: "[M]anipulation is a generic term for several forms of influence that are neither persuasive nor coercive. The essence of manipulation is swaying people to do what the manipulator wants by means other than coercion or persuasion."²⁶ Moreover, Beauchamp and Childress explain that a "[...] key form of manipulation is informational manipulation" which is the "deliberate act of managing information that nonpersuasively alters a person's understanding of a situation and thereby motivates him or her to do what the agent of influence intends."²⁷

The question is how did Owen manipulate his clients and from the perspective of the Formula of the End in Itself, why is this wrong? I will begin with the former.

According to the investigations of ProPublica, some of the Bishops of the LDS sent to Owen young Mormon men who admitted to having same-sex desires. Owen would employ a form of Conversion Therapy to help the young men change their sexual orientation. Unfortunately, using his authority as a counselor and as a LDS Bishop, Owen would convince his clients that "[...] touching was a therapeutic way to learn how to accept love and intimacy."²⁸ Without understanding what was really going on, Owen would subtly turn the touching into sexual touching sessions.

So, the question is this: Did Owen violate Kant's Second Formula? A strong case can be made that Owen violated, on many occasions, his deep obligation to protect and enhance his client's autonomy and rational decision-making process. For example, Owen manipulated (many of) his young male clients. He deliberately and nonpersuasively altered his client's understanding of the methods he planned to use to help them change their sexual orientation. Thus, because Owen (secretly) intended to misrepresent himself to his clients, Owen knew that the goal he intended to pursue, viz., the goal of his own sexual gratification, was not the same goal his clients

²⁶ Beauchamp, T. L., Childress, J. F., 2001. *Principle of Biomedical Ethics*, 5th ed. Oxford University Press, p. 95.

²⁷ Ibid.

²⁸ Schreifels, J., The Salt Lake Tribune, 2025. *Utah Ex-Therapist Scott Owen Sentenced to Prison for Sexually Abusing Patients*, ibid.

thought they would attain. The reason is that if his clients understood what Owen was going to do, they would immediately object to Owen's plan and goal. This is to say that his clients would not assent to be treated merely as a means.

Infringement of Client Dignity

Owen's approach to counseling and to his clients failed to respect the dignity of his clients. Why is this so? Above, a case was made that Owen treated many of his clients as merely as a means. This is to say that Owen used his clients to satisfy his own sexual desires, a goal that his clients did not share. But why is this morally significant? To treat an individual in such a manner fails to recognize and fails to treat that individual as an End. Thus, Owen's behavior failed to recognize and missed the mark to treat many of his clients as Ends.

But what are we to make of this? I made the point above that to recognize that such a being is an End is to recognize that this being is a loci or fountain of rational purposive behavior. From such a viewpoint, rational beings create goals and projects. Such an acknowledgement, then, serves as the foundation for the intrinsic moral worth of all rational beings. It also requires that all rational beings must be treated with respect and dignity. Thus, because Owen treated many of his clients as merely a means, Owen failed, not only to recognize the intrinsic moral worth of the individuals who were his clients, but he also failed to live up to the counseling obligation to treat his clients with respect and dignity.

The Breach of Informed Consent

The last section to discuss is the moral impermissibility of violating the value of informed consent. Before I discuss this issue, what does informed consent mean? Again, I follow Beauchamp and Childress' view of informed consent. Briefly, informed consent involves an information component and a comprehensive component. Of the former, Beauchamp and Childress write: "The informational component refers to disclosure of information and comprehension of what is disclosed."²⁹ Of the latter, "The consent component refers to both a voluntary decision and an authorization to proceed."³⁰ Thus, as Beauchamp and Childress make clear that there are five components of informed consent: "(1) competence,

²⁹ Beauchamp, T. L., Childress, J. F., 2001. *Principle of Biomedical Ethics*, 5th ed. Oxford University Press, *ibid.*, p. 79.

³⁰ *Ibid.*

(2) disclosure, (3) understanding, (4) voluntariness, and (5) consent.”³¹

Because of the complexity of this definition, I will focus only on the violation of (2) disclosure. The notion of disclosure remains an essential aspect of informed consent. In fact, as Beauchamp and Childress make clear, historically speaking, it has been treated as the sole condition of informed consent.³² Nevertheless, while disclosure makes sense as a necessary condition, too many counterexamples run forward, protesting that it cannot be a sufficient condition. Thus, other conditions must be in place before something like informed consent can be captured.

As an important necessary condition, disclosure has received a lot of attention in need of a standard. Beauchamp and Childress list three standards of disclosure: the professional practice standard, the reasonable person standard, and the subject standard.³³ Beauchamp and Childress reject the first two standards and (guardedly) endorse the third standard. I will briefly discuss all three standards starting with the first one. After that, I will apply the third standard to the Owen case.

The professional practice standard “holds that a professional communities customary practices determine adequate disclosure.”³⁴ Briefly, this means that professionals in the professional industry determine what information would satisfy the disclosure standard.³⁵ One obvious problem with this standard, and as Beauchamp and Childress make clear, the most compelling objection, “the professional practice standard subverts the right of autonomous choice.”³⁶

The second standard does not, likewise, fare well. The reasonable person standard turns on the assumption that the relevant information during a disclosure is “measured by the significance a [hypothetical] reasonable person would attach to it...”³⁷ One problem with this standard points to the challenge of how to use such a standard. In particular, as Beauchamp and Childress clarify, the “abstract and hypothetical character makes it difficult for”³⁸ professionals to use.

The final standard, i.e., the subjective standard, unlike the reasonable person standard, “judges adequacy of information by reference to the

³¹ Ibid.

³² Ibid., pp. 80–81.

³³ Ibid., pp. 80–83.

³⁴ Ibid., p. 81.

³⁵ Ibid., p. 82.

³⁶ Ibid.

³⁷ Ibid.

³⁸ Ibid.

specific informational needs of the individual person.”³⁹ This standard recognizes that different individuals have different disclosure needs, and as a result, disclosure “should be tailored to the individual.”⁴⁰ Although Beauchamp and Childress state that this standard is the morally preferable standard of disclosure, it may still be insufficient in certain contexts, including the complex contexts of the legal industry and ethical situations.⁴¹

The subjective standard of disclosure brings to light something in Kant’s Formula of the End of Itself that may be overlooked. Here’s what I mean. Kant writes: “[...] someone who has it in mind to make a lying promise to others will see at once that he wants to make use of another human being *merely as a means*, who does not at the same time contain in himself the end.”⁴² What emerges from this example effectively illustrates the subjective standard of disclosure from the viewpoint of the individual who makes the lying promise. This is to say that when the individual makes the lying promise, he immediately realizes that the information he withholds is (subjectively) relevant information needed for disclosure and, as a result, the satisfaction of informed consent.

Thus, the discussion above brings light to the Owen case. Counselors have an obligation to treat their clients as rational decision-makers capable of informed consent. To ensure that this obligation is discharged, the counselor must disclose any information to the client in order to satisfy the subjective standard of disclosure. To intentionally leave out information that would affect the consent of the client points to treating the client as merely as a means. That is, if the counselor immediately realizes that withholding relevant information will affect the outcome in his favor, he understands that this will violate his duty of informed consent.

This leads to my final point. The above discussion demonstrates the egregious nature of Owen’s actions. During his Conversion Therapy sessions, each time Owen recommended to the young Mormon men that “touching was a therapeutic way to learn how to accept love and intimacy,” he immediately realized his failure of disclosure. Put another way, when Owen comprehended that the information he withheld was necessary to bring about his immoral goals and projects, he realized that the information he withheld from the young men, and if known to the young men, would undermine the nature of his sexual exploitations.

³⁹ Ibid., p. 83.

⁴⁰ Ibid.

⁴¹ Ibid.

⁴² Kant, I., 2011. *Groundwork of the Metaphysics of Morals: A German-English Edition*, *ibid.*, p. 87.

Conclusion

The focus of this paper concentrates on the implications that Kant's Second Formula of the Categorical Imperative has for boundary violations in a counseling setting. I argue that Owen violated several important counseling values essentially treating his clients as merely as a means: First, Owen failed to protect and enhance his client's autonomy and rational decision-making process. Instead, on numerous occasions, Owen manipulated his clients to satisfy his sexual pleasures. This is to say that, using his authority as a counselor and as a Bishop of the LDS church, Owen deliberately and nonpersuasively distorted his client's perspectives with the following result: He compromised his client's ability to make rationally informed decisions and, thus, undermined his client's ability to understand Owen's egregious goals. Second, instead of treating his clients as an End, i.e., as loci or fountains of rational purposive behavior with unconditional value, he violated the dignity of his clients, i.e., his actions humiliated his clients and diminished their self-worth. Third, Owen failed to respect the counseling value of informed consent. Owen withheld relevant information that affected the outcomes in his favor while, at the same, understanding that he was violating his duty of informed consent.

In the end, one of the great outstanding features of Kant's second formula of the Categorical Imperative is how it underscores the importance of the APA professional code (and other codes like it): "Psychologists do not engage in sexual intimacies with current therapy/patients."⁴³ As this article attempted to make clear, it needs no great play of imagination to see that the violation of this code leads to morally reprehensible consequences.

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⁴³ Campbell, L., Knauss, L., Meaux, L., 2021. The American Psychological Association Ethics Code and Legal Statutes Regarding Sexual Boundary Violations: History and Current Status, *ibid.*, p. 30.

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