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**BEFORE THE ARIZONA STATE
BOARD OF TECHNICAL REGISTRATION**

In the Matter of:
Raed Dalbik
P.E. (Civil) and R.L.S.
Registration Nos. 51310 and 67877
J.L.D. Engineering
Firm Registration No. 23683
Respondents

Case No.: P22-028

**CONSENT AGREEMENT
and
ORDER OF DISCIPLINE**

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In the interest of a prompt and judicious resolution of the above-captioned matter before the Arizona State Board of Technical Registration (“Board”) and consistent with the public interest, statutory requirements, and the responsibilities of the Board, and pursuant to A.R.S. § 32-101 et seq., and A.A.C. R4-30-120(G), the undersigned party, Raed Dalbik (“Respondent”), holder of P.E. (Civil) Registration No. 51310, and J.L.D. Engineering (“Respondent Firm”), holder of Registration No. 23683 and the Board enter into the following Recitals, Findings of Fact, Conclusions of Law and Order (“Consent Agreement”) as a final disposition of this matter.

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RECITALS

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1. Respondent has read and understands this Consent Agreement and has had the opportunity to discuss this Consent Agreement with an attorney, or has waived the opportunity to discuss this Consent Agreement with an attorney.
 2. Respondent understands that he has a right to a public administrative hearing concerning this case. He further acknowledges that at such formal hearing he could present evidence and cross-examine witnesses. By entering into this Consent Agreement, Respondent knowingly, voluntarily, and irrevocably waives his right to such an administrative hearing, as well as rights of rehearing, review, reconsideration, appeal, judicial review or any other administrative and/or judicial action concerning the matters set forth herein.
 3. Respondent affirmatively agrees that this Consent Agreement shall be

1 irrevocable.

2 4. Respondent understands that this Consent Agreement or any part of the
3 agreement may be considered in any future disciplinary action by the Board against him.

4 5. The Consent Agreement, any record prepared in this matter, all investigative
5 materials prepared or received by the Board and all related exhibits and materials, are
6 public records (as defined in A.R.S. § 41-158.18) upon acceptance by the Board of this
7 Consent Agreement and may be retained in the Board's files pertaining to this matter.

8 6. Respondent understands this Consent Agreement deals with Board case
9 number P22-028 involving allegations that Respondent engaged in conduct that would
10 subject him to discipline under the Board's statutes and rules. The investigation into
11 these allegations against Respondent shall be concluded upon the Board's adoption of
12 this Consent Agreement.

13 7. Respondent understands that this Consent Agreement does not constitute a
14 dismissal or resolution of any other matters currently pending before the Board, if any,
15 and does not constitute any waiver, express or implied, of the Board's statutory authority
16 or jurisdiction regarding any other pending or future investigation, action or proceeding.

17 8. Respondent also understands that acceptance of this Consent Agreement does
18 not preclude any other agency, subdivision, or officer of this State from instituting any
19 other civil or criminal proceedings with respect to the conduct that is the subject of this
20 Consent Agreement.

21 9. Respondent acknowledges and agrees that, upon signing this Consent
22 Agreement and returning this document to the Board's Executive Director, he may not
23 revoke his acceptance of the Consent Agreement or make any modifications to the
24 document regardless of whether the Consent Agreement has been signed on behalf of the
25 Board. Any modification to this original document is ineffective and void unless
26 mutually agreed by the parties in writing.

27 10. This Consent Agreement is subject to the approval of the Board and is
28 effective only when accepted by the Board and signed on behalf of the Board. If the

1 Board does not accept this Consent Agreement, the Board retains its authority to hold a
2 formal administrative hearing pursuant to A.R.S. § 32-128(E). In the event that the
3 Board does not approve this Consent Agreement, it is withdrawn and shall be of no
4 evidentiary value and shall not be relied upon nor introduced in any action by any party,
5 except that the parties agree that should the Board reject this Consent Agreement and this
6 case proceeds to hearing, Respondent shall assert no claim that the Board was prejudiced
7 by its review and discussion of this document or any records relating thereto.

8 11. If a court of competent jurisdiction rules that any part of this Consent
9 Agreement is void or otherwise unenforceable, the remainder of the Consent Agreement
10 shall remain in full force and effect.

11 12. Respondent understands that any violation of this Consent Agreement may
12 result in disciplinary action, including suspension or revocation of the registration under
13 A.R.S. § 32-150.

14 13. Respondent agrees that the Board will adopt the following Findings of Fact,
15 Conclusions of Law and Order.

16 **FINDINGS OF FACT**

17 1. The Board is the duly constituted authority for the regulation and control of
18 the practice of Professional Engineering and Land Surveying in the State of Arizona.

19 2. Respondent is the holder of Arizona Professional Engineer (Civil)
20 Registration No. 51310 and Registered Land Surveyor Registration No. 67877.

21 3. Respondent Firm is holder of Firm Registration No. 23683, which was first
22 registered with the Board on December 9, 2021.

23 4. Respondent began a business relationship with a Non-Registrant in late 2019
24 to early 2020 in which Respondent agreed to review and apply a professional seal to
25 Land Surveying and Civil Engineering documents submitted to Respondent by the Non-
26 Registrant for an agreed upon financial benefit to Respondent.

27 5. On April 28, 2021, Respondent submitted a complaint to the Board that
28 alleged that the Non-Registrant was involved in the fraudulent use of Respondent's

1 professional seal and stamp. During the course of the investigation, information surfaced
2 that established that Respondent was involved in Aiding and Abetting the Non-Registrant
3 in evading Board statutes as well as the application of Respondent's professional seal and
4 signature on professional documents not prepared by himself of a bona fide employee.

5 6. On November 30, 2021, Respondent admitted that he "*reviewed and stamped*
6 *a total of 13 boundary survey projects*" for the Non-Registrant, who is not a bona fide
7 employee of the Respondent or Respondent Firm.

8 7. Respondent admitted, with regard to engineering related projects with the
9 Non-Registrant, he was involved in the reviewing and stamping of professional
10 documents associated with percolation tests. This agreement also resulted in a financial
11 benefit to Respondent as the Non-Registrant compensated him for his review and
12 application of the professional seal.

13 8. Respondent's agreement with the Non-Registrant effectively allowed her to
14 engage in both Land Surveying and Engineering related projects despite lacking the
15 required Board registration.

16 9. On November 15, 2018, Respondent Firm was incorporated in the State of
17 Arizona. Respondent prepared professional documents, to include a Percolation
18 Datasheet signed by Respondent on February 15, 2021, that specifically established
19 Respondent Firm as involved in the practicing of the engineering required for the
20 preparation of professional documents. Board records reflect that Respondent Firm was
21 not registered until December 9, 2021, only after Board staff inquired about the
22 Respondent Firm registration with Respondent.

23 **CONCLUSIONS OF LAW**

24 1. The Board has jurisdiction in this matter pursuant to A.R.S. § 32-101, et seq.

25 2. The conduct alleged in the Findings of Fact constitutes grounds for discipline
26 pursuant to A.R.S. § 32-128(C)(4) as it relates to A.A.C. R4-30-301(16), in that
27 Respondent signed and seal professional documents not prepared by himself or a bona
28 fide employee.

1 Registration. according to the provisions of A.R.S. § 32-128(H).

2 5. OBEY ALL LAWS. Respondent shall obey all federal, state and local
3 laws, as well as, all rules governing the practice of Engineering and Land Surveying in
4 the State of Arizona. The Board shall consider any violation of this paragraph to be a
5 separate violation of the rules and statues governing the Arizona Board of Technical
6 Registration. The Board may also consider Respondent's non-compliance with this
7 Order as a separate violation of A.R.S. § 32-150.

8 6. RENEWAL OF REGISTRATION. Respondent and Respondent Firm shall
9 timely renew their Arizona registration as a Professional Engineer and Registered Land
10 Surveyor and an Engineering Firm, and timely pay all required registration fees.

11 7. EFFECTIVE DATE. The effective date of this Consent Agreement is the
12 date the Respondent and Board sign the Consent Agreement. If the dates are different, the
13 effective date is the later of the two dates.

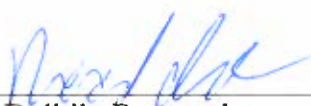
14 8. COSTS OF COMPLIANCE. Respondent shall pay all costs associated
15 with complying with this Consent Agreement.

16 9. NONCOMPLIANCE. If Respondent violates this Order in any way or fails
17 to fulfill the requirements of this Order, the Board, after giving notice and the opportunity
18 to be heard, may revoke, suspend or take other disciplinary actions against the
19 registration. The issue at such a hearing will be limited solely to whether this Order has
20 been violated.

21 ACCEPTED and ORDERED this 7 day of FEBRUARY, 2022.

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25 Jack Gilmore, L.A., Chairman
26 Arizona State Board of
27 Technical Registration

28 Consent Agreement and Order, No. P22-028 accepted this 25 day of
January, 2022.

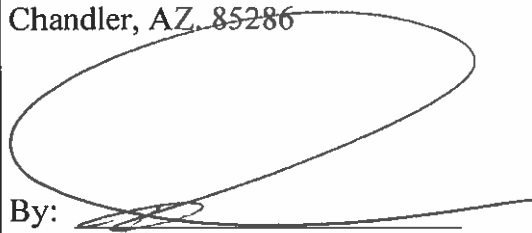


Raed Dalbik, Respondent, on behalf of
himself and J.L.D. Engineering PLLC,
Respondents

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4 ORIGINAL filed this 7 day of
5 February, 2022, with:

6 Arizona State Board of Technical Registration
7 1110 W. Washington, Suite 240
8 Phoenix, AZ 85007

9 COPY of the foregoing mailed via Certified Mail
10 No. 9214 8901 9434 4600 0866 06 and
11 First Class mail this 7 day of February, 2022, to:

12 Raed Dalbik
13 2822 S. Buckskin Way
14 Chandler, AZ, 85286

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16
17 By: 
18 GM Boehm, BTR Investigator