



BEFORE THE ARIZONA STATE

BOARD OF TECHNICAL REGISTRATION

In the Matter of:

Case No.: P23-057

**Khalil Khani AKA Mathew Parker
Non-Registrant**

**CONSENT AGREEMENT
and
ORDER OF DISCIPLINE**

Respondent

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, Khalil Khani, AKA Mathew Parker, Non-Registrant, (“Respondent”) 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.

RECITALS

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 irrevocable.

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

3 5. The Consent Agreement, any record prepared in this matter, all investigative
4 materials prepared or received by the Board and all related exhibits and materials, are
5 public records upon acceptance by the Board of this Consent Agreement and may be
6 retained in the Board's files pertaining to this matter.

7 6. Respondent understands this Consent Agreement deals with Board case
8 number P23-057 involving allegations that Respondent engaged in conduct that would
9 subject him to discipline under the Board's statutes and rules. The investigation into
10 these allegations against Respondent shall be concluded upon the Board's adoption of
11 this Consent Agreement.

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

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

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

26 10. This Consent Agreement is subject to the approval of the Board and is
27 effective only when accepted by the Board and signed on behalf of the Board. If the
28 Board does not accept this Consent Agreement, the Board retains its authority to hold a

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

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

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

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

15 **FINDINGS OF FACT**

16 1. The Board is the duly constituted authority for the regulation and control of
17 the practice of professional engineering in the State of Arizona.

18 2. Respondent is not registered with the Board as a Professional Engineer.

19 3. On December 7, 2022, the Board received a complaint that involves an
20 allegation that Respondent held himself out as qualified to practice a Board regulated
21 profession, despite lacking the required Board registration.

22 4. On January 20, 2023, Respondent's Twitter account included the following
23 statement: "*I'm senior structural engineer with many years experience in various*
24 *engineering field.*" Respondent's Twitter account shows him located in Arizona, and also
25 linked him to S3DA Design, a firm operating in Arizona.

26 5. Board records reflect Respondent is not, nor has ever been registered by the
27 Board as a Structural Engineer.

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1 **CONCLUSIONS OF LAW**

2 1. The Board has jurisdiction in this matter pursuant to A.R.S. § 32-101, et seq,
3 including A.R.S. § 32-106.02(A).

4 2. The conduct alleged in the Findings of Fact, constitutes grounds for
5 discipline pursuant to A.R.S. § 32-145, in that Respondent specifically identified himself
6 as a Structural Engineer in Arizona, implying himself as qualified to practice structural
7 engineering.

8 **ORDER**

9 Based on the foregoing Findings of Fact and Conclusions of Law, the Board issues
10 the following Order:

11 1. **CIVIL PENALTY.** Within Thirty (30) days from the effective date of this
12 Consent Agreement, Respondent shall pay a civil penalty of One Thousand Dollars
13 (\$1,000.00) by certified check or money order made payable to the State of Arizona
14 Board of Technical Registration, according to the provisions of A.R.S. § 32-106.02(A).

15 2. **COST OF INVESTIGATION.** Within Thirty (30) days from the effective
16 date of this Consent Agreement, Respondent shall pay the cost of investigation of this
17 case to the Board in the amount of Six Hundred Twenty Dollars (\$620.00) by certified
18 check or money order made payable to the State of Arizona Board of Technical
19 Registration, according to the provisions of A.R.S. § 32-128(H).

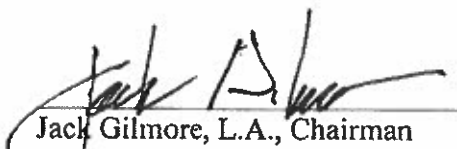
20 3. **OBEY ALL LAWS.** Respondent shall obey all federal, state and local laws,
21 related to the practice of engineering in the State of Arizona. The Board shall consider
22 any violation of this paragraph to be a separate violation of the statutes governing the
23 Arizona Board of Technical Registration.

24 4. **EFFECTIVE DATE.** The effective date of this Consent Agreement is the
25 date the Respondent and Board sign the Consent Agreement. If the dates are different, the
26 effective date is the later of the two dates.

27 5. **COSTS OF COMPLIANCE.** Respondent shall pay all costs associated with
28 complying with this Consent Agreement.

1 6. NONCOMPLIANCE. If Respondent violates this Order in any way or fails
2 to fulfill the requirements of this Order, the Board may seek a Petition for Injunction in
3 accordance with the provisions set forth in A.R.S. § 32-106.01.

4 ACCEPTED and ORDERED this Friday day of May 19, 2023.

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7 
8 Jack Gilmore, L.A., Chairman
9 Arizona State Board of
10 Technical Registration

11 Consent Agreement and Order, No. P23-057 accepted this 19 day of
12 May, 2023.

13 
14 Khalil Khani, AKA Mathew Parker,
15 Respondent

16 ORIGINAL filed this Friday day of
17 May 19, 2023, with:

18 Arizona State Board of Technical Registration
19 1110 W. Washington, Suite 240
20 Phoenix, AZ 85007

21 COPY of the foregoing mailed via Certified Mail
22 No. 7214890194344600092379 and
23 First Class mail this 19 day of May, 2023, to:

24 Khalil Khani, AKA Mathew Parker
25 2614 Fawn Dr.
26 Phoenix, AZ. 85041

27 By: 
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