BEFORE THE ARIZONA STATE

BOARD OF TECHNICAL REGISTRATION

In the Matter of:

Case No. P21-050

Consulting Engineers, Corp, DBA: IDES Global Firm Registration No. 23005

CONSENT AGREEMENT and ORDER OF DISCIPLINE

Respondent Firm

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, Consulting Engineers, Corp, DBA: IDES Global Firm Registration No. 23005 ("Respondent Firm") 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 Firm 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 Firm 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.

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- 3. Respondent Firm affirmatively agrees that this Consent Agreement shall be irrevocable.
- 4. Respondent Firm understands that this Consent Agreement or any part of the agreement may be considered in any future disciplinary action by the Board against him.
- 5. The Consent Agreement, any record prepared in this matter, all investigative materials prepared or received by the Board and all related exhibits and materials, are public records (as defined in A.R.S. § 41-158.18) upon acceptance by the Board of this Consent Agreement and may be retained in the Board's files pertaining to this matter.
- 6. Respondent Firm understands this Consent Agreement deals with Board case number P21-050, involving allegations that Respondent engaged in conduct that would subject him to discipline under the Board's statutes and rules. The investigation into these allegations against Respondent shall be concluded upon the Board's adoption of this Consent Agreement.
- 7. Respondent Firm understands that this Consent Agreement does not constitute a dismissal or resolution of any other matters currently pending before the Board, if any, and does not constitute any waiver, express or implied, of the Board's statutory authority or jurisdiction regarding any other pending or future investigation, action or proceeding.
- 8. Respondent Firm also understands that acceptance of this Consent Agreement does not preclude any other agency, subdivision, or officer of this State from instituting any other civil or criminal proceedings with respect to the conduct that is the subject of this Consent Agreement.
- 9. Respondent Firm acknowledges and agrees that, upon signing this Consent Agreement and returning this document to the Board's Executive Director, he may not revoke his acceptance of the Consent Agreement or make any modifications to the document regardless of whether the Consent Agreement has been signed on behalf of the Board. Any modification to this original document is ineffective and void unless mutually agreed by the parties in writing.
- 10. This Consent Agreement is subject to the approval of the Board and is effective only when accepted by the Board and signed on behalf of the Board. If the Board does not accept this Consent Agreement, the Board retains its authority to hold a formal administrative hearing pursuant to A.R.S. § 32-128(E). In the event that the Board does not approve this Consent

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Agreement, it is withdrawn and shall be of no evidentiary value and shall not be relied upon nor introduced in any action by any party, except that the parties agree that should the Board reject this Consent Agreement and this case proceeds to hearing, Respondent Firm shall assert no claim that the Board was prejudiced by its review and discussion of this document or any records relating thereto.

- 11. If a court of competent jurisdiction rules that any part of this Consent Agreement is void or otherwise unenforceable, the remainder of the Consent Agreement shall remain in full force and effect.
- 12. Respondent Firm understands that any violation of this Consent Agreement may result in disciplinary action, including suspension or revocation of the registration under A.R.S. § 32-150.
- Respondent Firm agrees that the Board will adopt the following Findings of Fact,
 Conclusions of Law and Order.

FINDINGS OF FACT

- 1. The Board is the duly constituted authority for the regulation and control of the practice of Engineering Firm in the State of Arizona.
- 2. On December 10, 2020, the Board received a complaint alleging that Respondent Firm solicited to practice engineering in the state of Arizona without firm registration via the website http://www.ides-global.com.
- 3. On December 10, 2020, Board records show no indication that Respondent Firm has ever been registered with the Board.
- 4. On December 16, 2020, Board staff observed Respondent Firm's website www.ides-global.com, advertising to the public engineering services in the State of Arizona.
- 5. On January 4, 2021, Board staff spoke to Respondent Firm's Chief Operating Officer Rocco DeLeonardis, who acknowledged that the firm had been advertising engineering services in the State of Arizona through their website www.ides-global.com.
- 6. On January 13, 2021, the Board issued Consulting Engineers, Corp, Firm Registration No. 23005, with an expiration date of January 13, 2022 with Mahraj Jalla, P.E.

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 No.31986, as active Firm Principal.

CONCLUSIONS OF LAW

- 1. The Board has jurisdiction in this matter pursuant to A.R.S. § 32-101, et seq, including A.R.S. § 32-106.02(A).
- 2. The conduct alleged in the Findings of Fact constitutes grounds for discipline pursuant to A.R.S. § 32-141, in that Respondent Firm, advertised a Board-regulated profession without firm registration.

ORDER

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

- 1. ADMINISTRATIVE PENALTY. Within sixty (60) days from the effective date of this Consent Agreement, Respondent Firm shall pay an administrative penalty of Two Hundred Fifty Dollars (\$250.00) by certified check or money order made payable to the State of Arizona Board of Technical Registration.
- 2. COST OF INVESTIGATION. Within thirty (30) days from the effective date of this Consent Agreement, Respondent Firm shall pay the cost of investigation of this case to the Board in the amount of Eighty-Three Dollars (\$83.00) by certified check or money order made payable to the State of Arizona Board of Technical Registration, according to the provisions of A.R.S. § 32-128(H).
- 3. OBEY ALL LAWS. Respondent Firm shall obey all federal, state and local laws, related to the practice of Land Surveying in the State of Arizona. The Board shall consider any violation of this paragraph to be a separate violation of the statutes governing the Arizona Board of Technical Registration.
- 4. EFFECTIVE DATE. The effective date of this Consent Agreement is the date the Respondent Firm and Board sign the Consent Agreement. If the dates are different, the effective date is the later of the two dates.
- 5. COSTS OF COMPLIANCE. Respondent Firm shall pay all costs associated with complying with this Consent Agreement.

Aires	6. NONCOMPLIANCE. If Respondent Firm violates this Order in any way or fails
7	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.
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5	ACCEPTED and ORDERED this 27 day of April , 2021.
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7	Carmen Wyckoff, R.A., Chairman
8	Arizona State Board of Technical Registration
9	Consent Agreement and Order, No. P21-050, accepted this 9th day of 4pril, 2021.
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13	Rocco DeLeonardis, Personally and on behalf of Consulting Engineers, Corp, DBA: IDES
14	Global, Respondents
15	ORIGINAL filed this 27th day of
16	April, 2021, with:
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18	Arizona State Board of Technical Registration 1110 W. Washington, Suite 240
19	Phoenix, AZ 85007
20	
21	No. 9214890194344600 081229 and
22	First Class mail this 21 day of April , 2021, to:
23	
24	Rocco DeLeonardis Consulting Engineers, Corp, DBA: IDES Global
25	11480 Sunset Hills Road, Suite 100-E Reston, Virginia 20190
26	
27	By: Z Mell
28	

USPS CERTIFIED MAIL



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ROCCO DELEONARDIS STE 100E 11480 SUNSET HILLS RD RESTON VA 20190-5240

APR 2 7 2021

Username: Andrew Puccino (andrew.puccino@azbtr.gov)