

**BEFORE THE OKLAHOMA STATE BOARD OF LICENSURE FOR  
PROFESSIONAL ENGINEERS AND LAND SURVEYORS**

STATE OF OKLAHOMA *ex rel.* OKLAHOMA )  
STATE BOARD OF LICENSURE FOR )  
PROFESSIONAL ENGINEERS AND LAND )  
SURVEYORS, )

Complainant,

vs.

Name: Reza Sadeghbeigi )  
Certificate of Licensure No.: PE 31905 )  
Address: 4415 Ione Street )  
Bellaire, TX 77401 )

Name: RMS Engineering, Inc. )  
Certificate of Authorization No.: 8366 (Inactive) )  
Address: 5959 W. Loop South, Suite 625 )  
Bellaire, TX 77401 )

Respondents. )

**FILED**

**MAR 08 2022**

OKLA. BOARD OF LIC. FOR  
PROF. ENGRS. & LAND SURVEYORS

Case No. 2022-006

**FORMAL NOTICE OF CHARGES**

COMES NOW the Oklahoma State Board of Licensure for Professional Engineers and Land Surveyors (hereinafter the "Board") by and through its attorney, Robert A. Manchester, IV and based upon the recommendation of the Board's Investigation Committee, brings this Formal Notice of Charges against the above named Respondents, RMS Engineering, Inc. (the Firm) and Reza Sadeghbeigi (Sadeghbeigi) (collectively the "Respondents").

**NOTICE OF HEARING**

1. On April 7, 2022, the Board will be in session at 9:00 o'clock a.m. at 220 N.E. 28<sup>th</sup> Street, Oklahoma City, Oklahoma, at which time this Formal Notice of Charges will be considered by the Board and a formal fact finding hearing will be held pursuant to Oklahoma Administrative Procedures Act, 75 O.S. § 301, *et seq.*, the Statutes Regulating Professional

Engineering and Land Surveying, 59 O.S. § 475.1 *et seq.*, and the duly promulgated Rules of the Board OAC § 245:2 *et seq.*

2. Respondents, in accordance with the above mentioned statutes and rules, have the right to appear personally or to be represented by an attorney and will be afforded the opportunity to respond, compel the testimony of witnesses, present evidence, and argue all issues involved.

3. Respondents are ordered by the Board to appear at said hearing on said date. If a Respondent is not present in person or through legal counsel, then the proceeding will be held in the absence of such Respondent, and the Board, in its discretion, may summarily take appropriate action as authorized by law. The Board will notify the absent Respondent(s) of its final decision in writing.

### **JURISDICTION**

Jurisdiction for this Formal Notice of Charges is based upon:

4. The statutes regulating Professional Engineering and Land Surveying, 59 O.S. § 475.1 *et seq.*

5. The Rules of the Oklahoma State Board of Licensure for Professional Engineers and Land Surveyors (OAC § 245:2 *et seq.*).

### **STATEMENT OF ALLEGATIONS/CHARGES**

6. On September 10, 2019, Reza Sadeghbeigi (Sadeghbeigi) submitted an Oklahoma Temporary License (T.L.) application and an incomplete permanent Professional Engineer (P.E.) license application.

7. On September 10, 2019, Sadeghbeigi was issued Oklahoma Temporary License (T.L.) number 922.

8. On October 2, 2019, RMS Engineering, Inc. (the Firm) was issued Oklahoma Certificate of Authorization number 8366.

9. On November 30, 2019, Certificate of Authorization number 8366 for the Firm was made INACTIVE for failure to renew the certificate by payment of the pro-rated renewal fee which was due and payable on or before November 30, 2019.

10. On December 17, 2019, the Oklahoma State Board of Licensure for Professional Engineers and Land Surveyors (Board) filed a Formal Notice of Charges against Sadeghbeigi and the Firm in Case No. 2019-079. Charges included offering and practicing engineering services in the state of Oklahoma without a Professional Engineer (P.E.) Certificate of Licensure (Count I) or Certificate of Authorization (Count II), failure to submit a complete permanent P.E. application to the Board within thirty (30) days of the issuance of a Temporary P.E. License (Count III), and failure to provide information requested by the Board or its designated staff within thirty (30) days (Count IV).

11. On May 4, 2020, Sadeghbeigi was issued Professional Engineer (P.E.) license number 31905.

12. On June 2, 2020, the Board issued the Findings of Fact, Conclusions of Law, and Final Order in Case No. 2019-079, finding Sadeghbeigi guilty under Counts I, III, and IV, and the Firm guilty under Count II. Sadeghbeigi was assessed an administrative penalty of six thousand dollars (\$6,000.00) and RMS Engineering, Inc. was assessed an administrative penalty of one thousand dollars (\$1,000.00). These administrative penalties were to be paid within thirty (30) days of the issuance of the Final Order.

13. On June 10, 2020, Judy Rose, Office Manager at RMS Engineering, Inc., emailed Board Staff confirming receipt of the Final Order in Case No. 2019-079.

14. On July 13, 2020, Board Staff contacted Sadeghbeigi, via certified and regular mail, informing him that he was past due on the payment of the six thousand dollar (\$6,000.00) administrative penalty. Additionally, Sadeghbeigi was notified that he was past due on the payment of the one thousand dollar (\$1,000.00) administrative penalty assessed to the Firm. Sadeghbeigi was advised that to avoid the possibility of additional charges being filed, the full payment of the administrative penalties must be remitted immediately.

15. As of the filing of this Formal Notice of Charges, Sadeghbeigi has not remitted payment for the six thousand dollar (\$6,000.00) administrative penalty, nor has the one thousand dollar (\$1,000.00) administrative penalty been remitted on behalf of the Firm.

### COUNT I

The Allegations contained in the Statement of Allegation/Charges Against Respondents above are incorporated herein by reference.

16. Sadeghbeigi has failed to comply with the terms of the Final Order in Case No. 2019-079.

17. Sadeghbeigi is, therefore, is guilty of violating the provisions of 59 O.S. § 475.18(A)(9) by failing to comply with the terms imposed by the Board and is, therefore, subject to and should be assessed the Administrative Penalties set forth in 59 O.S. § 475.20(B) and OAC § 245:15-23-3 and 18.

### COUNT II

The Allegations contained in the Statement of Allegation/Charges Against Respondents and Count I above are incorporated herein by reference.

18. The Respondent Firm, RMS Engineering, Inc., has failed to comply with the terms of the Final Order in Case No. 2019-079.

19. RMS Engineering, Inc. is, therefore, is guilty of violating the provisions of 59 O.S. §§ 475.18(A)(9) by failing to comply with the terms imposed by the Board and is, therefore, subject to and should be assessed the Administrative Penalties set forth in 59 O.S. § 475.20(B) and OAC § 245:15-23-3 and 18.

**REQUESTED FINDINGS OF THE BOARD AND PENALTY**

The undersigned requests the Board, after considering all the testimony, evidence and argument, to find:

1. Respondents are in violation of any or all of the aforementioned statutes and rules.
2. That appropriate action be taken against Respondents, which may include:
  - A. An Administrative Penalty;
  - B. Reprimand;
  - C. Censure;
  - D. Suspension;
  - E. Revocation;
  - F. Such other action as the Board deems appropriate.

Respectfully submitted,



ROBERT A. MANCHESTER, IV OBA #19518  
4308 North Meridian Avenue  
Oklahoma City, OK 73112  
(405) 525-6710  
(405) 528-5366 (Fax)  
Attorney for Oklahoma State Board of  
Licensure for Professional Engineers  
and Land Surveyors