

STATE OF WASHINGTON
DEPARTMENT OF FINANCIAL INSTITUTIONS
SECURITIES DIVISION

IN THE MATTER OF DETERMINING) Order Number S-08-002-08-CO01
Whether there has been a violation of the)
Securities Act of Washington by:) CONSENT ORDER
)
Global Aviation Fuel Systems and)
Bob (Neil) Neklewicz)
Respondents)

INTRODUCTION

Pursuant to the Securities Act of Washington, RCW 21.20, the Securities Division of the Department of Financial Institutions (“Securities Division”) and Respondents, Global Aviation Fuel Systems and Bob (Neil) Neklewicz, do hereby enter into this CONSENT ORDER in settlement of the matters alleged herein. Respondents neither admit nor deny the Findings of Fact and Conclusions of Law stated below.

FINDINGS OF FACT

I. RESPONDENTS

1. Global Aviation Fuel Systems (“GAFS”), has its principal place of business in Las Vegas, Nevada. GAFS purports to operate a Federal Aviation Administration certified repair shop buying and selling aircraft parts to airlines around the world.
2. Bob (Neil) Neklewicz (“Neklewicz”) holds himself out as to be President of GAFS, although GAFS is not registered as a corporation with the Nevada Secretary of State, nor is GAFS registered to conduct business in the State of Washington as a foreign corporation.

1 II. NATURE OF THE OFFERING

2 3. In October 2007, Respondents caused to be placed on the internet through their
3 website www.gafsusa.com, as well as the Seattle, Washington Financial Services section of
4 www.craigslist.org, an advertisement offering an investment opportunity in their “Boeing Fuel
5 Pump Inventory Investment Program” with a “20% Guaranteed Return – Expect 40% to 60%”.
6 \$10,000 was the minimum investment in order to purchase this “No-Risk Opportunity.”
7

8 4. At least one potential Washington investor responded to the advertisements via
9 email and telephone. Respondents told the potential Washington investor that “GAFS researches
10 the marketplace for quality Boeing 737 fuel pumps which are for sale with all the proper
11 documentation and traceability in an ‘as is’ or ‘as removed’ condition for approximately
12 \$5,000.” Once a suitable fuel pump was found, Respondent would instruct the investor to
13 purchase the pump COD and have the pump shipped to GAFS in Las Vegas for a bench test,
14 overhaul and/or repair. Respondents would be responsible for selling the pump and “[w]hen we
15 get paid we will forward to the investor [the] \$5,000 plus 20% profit, an additional \$1,000, for a
16 total of \$6,000, a 20% return on investment over a 120-day period.”
17

18 5. “Ideally, the investors were expected to repeat this process one or more times in a
19 calendar year to increase the return on the investment. Buying and selling three (3) different
20 \$5,000 pumps in one calendar year would result in a \$3,000 profit on a \$5,000 investment,
21 \$15,000 on a \$25,000 investment, \$30,000 on a \$50,000 investment, \$60,000 on a \$100,000
22 investment, or a 60% return on a no-risk investment.”

23 6. Respondents represented to the potential Washington investor that the investment
24 was guaranteed because of the sheer size of the market for cheaper fuel pump replacement
25 alternatives, huge profit margins, that GAFS was certified in the USA and Europe, that GAFS

1 was one of a few fuel pump repair shops in the world, and that GAFS had “a growing list of
2 contacts around the world waiting for us to drastically increase our inventory.” Respondents also
3 told investors that if a pump did not sell, Respondents would buy it from the investor for the
4 investor’s cost plus a 20% profit.

5 III. MISREPRESENTATIONS AND OMISSIONS

6 7. Neklewicz failed to provide material information regarding the GAFS
7 investment opportunity, including, but not limited to, prospectus information such as financial
8 statements, use of proceeds and general and specific risk factors involved in the investment.
9

10 IV. REGISTRATION STATUS

11 8. Global Aviation Fuel Systems is not currently and has not previously been
12 registered to offer and/or sell its securities in the State of Washington.

13 9. Bob (Neil) Neklewicz is not currently registered as a securities salesperson or
14 broker-dealer in the State of Washington and has not previously been so registered.

15 Based upon the Findings of Fact, the following Conclusions of Law are made:

16 **CONCLUSIONS OF LAW**

17 1. The offer and/or sale of the investments described above constitute the offer
18 and/or sale of a security as defined in RCW 21.20.005(10) and (12).
19

20 2. In connection with the offer and/or sale of said securities, Global Aviation Fuel
21 Systems and Bob (Neil) Necklewicz, have each violated RCW 21.20.010 because, as set forth in
22 the Tentative Findings of Fact, Respondents made misstatements of material facts and/or omitted
23 to state material facts necessary in order to make the statements made, in light of circumstances
24 under which they were made, not misleading and/or engaged in acts and practices that operated
25 as fraud or deceit.

1 3. Bob (Neil) Necklewicz violated RCW 21.20.040 by offering and/or selling said
2 securities while not registered as a securities salesperson or broker-dealer in the State of
3 Washington.

4 4. Global Aviation Fuel Systems violated RCW 21.20.140 by offering and/or selling
5 unregistered securities.

6 **CONSENT ORDER**

7
8 Based upon the foregoing and finding it in the public interest:

9 IT IS AGREED AND ORDERED that, Global Aviation Fuel Systems and Bob (Neil)
10 Neklewicz, and their agents and employees each shall cease and desist from offering or
11 selling securities in violation of RCW 21.20.140, the securities registration section of the
12 Securities Act of Washington.

13 IT IS FURTHER AGREED AND ORDERED that, Global Aviation Fuel Systems and
14 Bob (Neil) Neklewicz, and their agents and employees each shall cease and desist from acting
15 as unregistered securities broker-dealers or salespersons in violation of RCW 21.20.040, the
16 broker-dealer and securities salesperson registration section of the Securities Act of
17 Washington.

18 IT IS FURTHER AGREED AND ORDERED that, Global Aviation Fuel Systems and
19 Bob (Neil) Neklewicz, and their agents and employees each shall cease and desist from
20 violating RCW 21.20.010, the anti-fraud section of the Securities Act of Washington.

21 IT IS FURTHER AGREED that the Securities Division has jurisdiction to enter this
22 Consent Order.
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25

1 IT IS FURTHER AGREED that in consideration of the foregoing, Global Aviation Fuel
2 Systems and Bob (Neil) Neklewicz, each waive their right to a hearing in this matter and
3 judicial review of this Consent Order.

4 IT IS FURTHER AGREED that Global Aviation Fuel Systems and Bob (Neil)
5 Neklewicz each enter into this Consent Order freely and voluntarily.

6
7 SIGNED this 10th day of August, 2008

8 Signed by:

9 Global Aviation Fuel Systems

10
11 By _____ /s/
12 Bob (Neil) Neklewicz, President

13 Signed by:

14 Bob (Neil) Neklewicz


15
16 By _____ /s/
17 Bob (Neil) Neklewicz, an individual

18 -----
19 DATED AND ENTERED this 25th day of August, 2008


20 

21 _____
MICHAEL E. STEVENSON
Securities Administrator

22 Approved by:

23 
24 Martin Cordell
Chief of Enforcement

25 Presented by:


Patrick Kim
Enforcement Attorney