1 STATE OF WASHINGTON DEPARTMENT OF FINANCIAL INSTITUTIONS 2 SECURITIES DIVISION 3 IN THE MATTER OF DETERMINING) Order Number S-08-002-08-SC01 4 Whether there has been a violation of the Securities Act of Washington by: STATEMENT OF CHARGES AND NOTICE 5 OF INTENT TO ENTER ORDER TO CEASE 6 AND DESIST AND TO CHARGE COSTS AND IMPOSE FINES 7 Global Aviation Fuel Systems and Bob (Neil) Necklewicz 8 Respondents) 9 THE STATE OF WASHINGTON TO: Global Aviation Fuel Systems Bob (Neil) Necklewicz 10 11 STATEMENT OF CHARGES 12 Please take notice that the Securities Administrator of the State of Washington has reason 13 to believe that Respondents, Global Aviation Fuel Systems and Bob (Neil) Necklewicz, have 14 each violated the Securities Act of Washington and that their violations justify the entry of an 15 order of the Securities Administrator under RCW 21.20.390 against each to cease and desist 16 from such violations, imposing fines pursuant to RCW 21.20.395, and charging costs pursuant to 17 RCW 21.20.390(5). The Securities Administrator finds as follows: 18 19 TENTATIVE FINDINGS OF FACT 20 I. RESPONDENTS 21 1. Global Aviation Fuel Systems ("GAFS"), has its principal place of business in 22 Las Vegas, Nevada. GAFS purports to operate a Federal Aviation Administration certified 23 repair shop buying and selling aircraft parts to airlines around the world. 24 25 DEPARTMENT OF FINANCIAL INSTITUTIONS STATEMENT OF CHARGES AND NOTICE OF

INTENT TO ENTER ORDER TO CEASE AND DESIST

AND TO CHARGE COSTS AND IMPOSE FINES

Securities Division

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2. Bob (Neil) Necklewicz ("Necklewicz") 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.

II. NATURE OF THE OFFERING

- 3. In October 2007, Respondents caused to be placed on the internet through their website www.gafsusa.com, as well as the Seattle, Washington Financial Services section of www.craigslist.org, an advertisement offering an investment opportunity in their "Boeing Fuel Pump Inventory Investment Program" with a "20% Guaranteed Return Expect 40% to 60%". \$10,000 was the minimum investment in order to purchase this "No-Risk Opportunity."
- 4. At least one potential Washington investor responded to the advertisements via email and telephone. Respondents told the potential Washington investor that "GAFS researches the marketplace for quality Boeing 737 fuel pumps which are for sale with all the proper documentation and traceability in an 'as is' or 'as removed' condition for approximately \$5,000." Once a suitable fuel pump was found, Respondent would instruct the investor to purchase the pump COD and have the pump shipped to GAFS in Las Vegas for a bench test, overhaul and/or repair. Respondents would be responsible for selling the pump and "[w]hen we get paid we will forward to the investor [the] \$5,000 plus 20% profit, an additional \$1,000, for a total of \$6,000, a 20% return on investment over a 120-day period."
- 5. "Ideally, the investors were expected to repeat this process one or more times in a calendar year to increase the return on the investment. Buying and selling three (3) different \$5,000 pumps in one calendar year would result in a \$3,000 profit on a \$5,000 investment, \$15,000 on a \$25,000 investment, \$30,000 on a \$50,000 investment, \$60,000 on a \$100,000 investment, or a 60% return on a no-risk investment."

6. Respondents represented to the potential Washington investor that the investment was guaranteed because of the sheer size of the market for cheaper fuel pump replacement alternatives, huge profit margins, that GAFS was certified in the USA and Europe, that GAFS was one of a few fuel pump repair shops in the world, and that GAFS had "a growing list of contacts around the world waiting for us to drastically increase our inventory." Respondents also told investors that if a pump did not sell, Respondents would buy it from the investor for the investor's cost plus a 20% profit.

III. MISREPRESENTATIONS AND OMISSIONS

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

IV. REGISTRATION STATUS

- 8. Global Aviation Fuel Systems is not currently and has not previously been registered to offer and/or sell its securities in the State of Washington.
- 9. Bob (Neil) Necklewicz is not currently registered as a securities salesperson or broker-dealer in the State of Washington and has not previously been so registered.

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

CONCLUSIONS OF LAW

- 1. The offer and/or sale of the investments described above constitute the offer and/or sale of a security as defined in RCW 21.20.005(10) and (12).
- 2. Bob (Neil) Necklewicz violated RCW 21.20.040 by offering and/or selling said securities while not registered as a securities salesperson or broker-dealer in the State of Washington.

STATEMENT OF CHARGES AND NOTICE OF INTENT TO ENTER ORDER TO CEASE AND DESIST AND TO CHARGE COSTS AND IMPOSE FINES

3.	Global Aviation Fuel Systems violated RCW 21.20.140 by offering and/or selling
unregistered so	ecurities.

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

NOTICE OF INTENT TO ORDER THE RESPONDENT TO CEASE AND DESIST

Pursuant to RCW 21.20.390, and based on the above Tentative Findings of Fact and Conclusions of Law, the Securities Administrator intends to order that Respondents, Global Aviation Fuel Systems and Bob (Neil) Necklewicz, and their agents and employees each shall cease and desist from violations of RCW 21.20.010, RCW 21.20.040, and RCW 21.20.140.

NOTICE OF INTENT TO IMPOSE FINES

Pursuant to RCW 21.20.395, and based upon the Tentative Findings of Fact and Conclusions of Law, the Securities Administrator intends to order that Respondents, Global Aviation Fuel Systems and Bob (Neil) Necklewicz, each shall be liable for and pay a fine of \$5,000.

NOTICE OF INTENT TO CHARGE COSTS

Pursuant to RCW 21.20.390, and based upon the Tentative Findings of Fact and Conclusions of Law, the Securities Administrator intends to order that the Respondents, Global Aviation Fuel Systems and Bob (Neil) Necklewicz, each shall be liable for and pay the Securities

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2	investigation and hearing of this matter, in an amount not less than \$1,500.
3	AUTHORITY AND PROCEDURE
4	This STATEMENT OF CHARGES AND NOTICE OF INTENT TO ISSUE AN
5	ORDER TO CEASE AND DESIST, IMPOSE FINES, AND CHARGE COSTS is entered
6	pursuant to the provisions of RCW 21.20.390 and RCW 21.20.395 and is subject to the
7	provisions of Chapter 34.05 RCW. The Respondents, Global Aviation Fuel Systems and Bob
9	(Neil) Necklewicz, each may make a written request for a hearing as set forth in the NOTICE OI
9	OPPORTUNITY TO DEFEND AND OPPORTUNITY FOR HEARING accompanying this
11	Order.
12	If a respondent does not request a hearing, the Securities Administrator intends to adopt
13	the above Tentative Findings of Fact and Conclusions of Law as final, enter a permanent order
14	against those respondents to cease and desist from violations of the Securities Act, and enter an
15	order imposing the fine and charging costs, as described above.
16	Dated and Entered this 1st day of February, 2008.
17	2 dica dia 21.00100 dia 130 day 01 1 0010 diay, 2000.
18	quidel Z, Stevenson
19	MICHAEL E. STEVENSON
20	Securities Administrator
21	Approved by: Presented by:
22	Martin Cordell Martin Cordell Patrick Kim
23	Chief of Enforcement Financial Legal Examiner
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Division the costs, fees and other expenses incurred in the conduct of the administrative

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