

STATE OF WASHINGTON
DEPARTMENT OF FINANCIAL INSTITUTIONS
SECURITIES DIVISION

IN THE MATTER OF DETERMINING) Order Number S-08-002-08-SC01
Whether there has been a violation of the)
Securities Act of Washington by:) STATEMENT OF CHARGES AND NOTICE
) OF INTENT TO ENTER ORDER TO CEASE
) AND DESIST AND TO CHARGE COSTS
) AND IMPOSE FINES
Global Aviation Fuel Systems and)
Bob (Neil) Necklewicz)
Respondents)

THE STATE OF WASHINGTON TO: Global Aviation Fuel Systems
Bob (Neil) Necklewicz

STATEMENT OF CHARGES

Please take notice that the Securities Administrator of the State of Washington has reason to believe that Respondents, Global Aviation Fuel Systems and Bob (Neil) Necklewicz, have each violated the Securities Act of Washington and that their violations justify the entry of an order of the Securities Administrator under RCW 21.20.390 against each to cease and desist from such violations, imposing fines pursuant to RCW 21.20.395, and charging costs pursuant to RCW 21.20.390(5). The Securities Administrator finds as follows:

TENTATIVE 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.

1 6. Respondents represented to the potential Washington investor that the investment
2 was guaranteed because of the sheer size of the market for cheaper fuel pump replacement
3 alternatives, huge profit margins, that GAFS was certified in the USA and Europe, that GAFS
4 was one of a few fuel pump repair shops in the world, and that GAFS had “a growing list of
5 contacts around the world waiting for us to drastically increase our inventory.” Respondents also
6 told investors that if a pump did not sell, Respondents would buy it from the investor for the
7 investor’s cost plus a 20% profit.
8

9 **III. MISREPRESENTATIONS AND OMISSIONS**

10 7. Necklewicz failed to provide material information regarding the GAFS
11 investment opportunity, including, but not limited to, prospectus information such as financial
12 statements, use of proceeds and general and specific risk factors involved in the investment.
13

14 **IV. REGISTRATION STATUS**

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

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

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

20 **CONCLUSIONS OF LAW**

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

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

1 3. Global Aviation Fuel Systems violated RCW 21.20.140 by offering and/or selling
2 unregistered securities.

3 4. In connection with the offer and/or sale of said securities, Respondents, Global
4 Aviation Fuel Systems and Bob (Neil) Necklewicz, have each violated RCW 21.20.010 because,
5 as set forth in the Tentative Findings of Fact, Respondents made misstatements of material facts
6 and/or omitted to state material facts necessary in order to make the statements made, in light of
7 circumstances under which they were made, not misleading and/or engaged in acts and practices
8 that operated as fraud or deceit.
9

10 **NOTICE OF INTENT TO ORDER THE RESPONDENT TO CEASE AND DESIST**

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

15 **NOTICE OF INTENT TO IMPOSE FINES**

16 Pursuant to RCW 21.20.395, and based upon the Tentative Findings of Fact and
17 Conclusions of Law, the Securities Administrator intends to order that Respondents, Global
18 Aviation Fuel Systems and Bob (Neil) Necklewicz, each shall be liable for and pay a fine of
19 \$5,000.
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21 **NOTICE OF INTENT TO CHARGE COSTS**

22 Pursuant to RCW 21.20.390, and based upon the Tentative Findings of Fact and
23 Conclusions of Law, the Securities Administrator intends to order that the Respondents, Global
24 Aviation Fuel Systems and Bob (Neil) Necklewicz, each shall be liable for and pay the Securities
25

1 Division the costs, fees and other expenses incurred in the conduct of the administrative
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
8 (Neil) Necklewicz, each may make a written request for a hearing as set forth in the NOTICE OF
9 OPPORTUNITY TO DEFEND AND OPPORTUNITY FOR HEARING accompanying this
10 Order.
11


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.


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19 _____
20 MICHAEL E. STEVENSON
21 Securities Administrator

21 Approved by:

22 
23 Martin Cordell
24 Chief of Enforcement

21 Presented by:

22 
23 Patrick Kim
24 Financial Legal Examiner