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**ELECTRONICALLY FILED**  
Superior Court of California,  
County of Alameda  
**01/23/2025 at 06:29:55 PM**  
By: Milagros Cortez,  
Deputy Clerk

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**SUPERIOR COURT FOR THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF ALAMEDA**

CENTER FOR ENVIRONMENTAL  
HEALTH,

Plaintiff,

v.

AERODYNAMIC AVIATION, *et al.*,

Defendants.

Case No. RG-11-600721

Hon. Somnath Raj Chatterjee

**DECLARATION OF GABRIELE  
ZINGARETTI IN SUPPORT OF  
DEFENDANTS' OPPOSITION TO  
MOTION TO ENFORCE AND MODIFY  
CONSENT JUDGMENT**

Date: February 4, 2025

Time: 1:30 p.m.

Reservation Number: 690015831804

Complaint Filed: October 20, 2011



1           7.       I attended the G100UL event at KWVI on November 23, 2024. At this event, I  
2 acquired a Supplemental Type Certificate (“STC”) to use G100UL. I applied the STC placards to  
3 my aircraft, which authorized me to use G100UL.

4           8.       Between November 24, 2024 and December 8, 2024, I purchased approximately  
5 80 gallons of G100UL.

6           9.       After placing G100UL in my aircraft, my copilot auxiliary tank developed a small  
7 leak. G100UL leaked from this tank onto my aircraft, and the paint showed signs of damage

8           10.      In addition, after placing G100UL in my aircraft, the main tank on the pilot side of  
9 my aircraft developed three small leaks by an inspection panel.

10          11.      In addition to my aircraft, I am aware of at least two other aircraft at KWVI and  
11 five aircraft at the Reid Hillview Airport that have experienced issues after using G100UL. One  
12 aircraft at KWVI experienced a bent pushrod/seized valve.

13          12.      I asked United Flight Services to inspect the leaks on my aircraft and the damaged  
14 paint.

15          13.      On Monday, January 13 United Flight Services informed me that it had reported  
16 concerns regarding G100UL to the San Jose Flight Standards District Office (“FSDO”) of the  
17 Federal Aviation Administration (“FAA”).

18          14.      On Wednesday, January 15, United Flight Services informed me that FAA  
19 inspectors were at the KWVI and wanted to take an oil sample from my aircraft.

20          15.      I consented to the FAA’s request to take an oil sample from my aircraft. FAA  
21 inspectors took a sample of oil from my aircraft and, to the best of my knowledge, are still  
22 investigating this sample.

23          16.      I understand that the FAA inspected several aircraft at KWVI that have used  
24 G100UL. To the best of my knowledge, I understand the FAA’s investigation of G100UL is still  
25 ongoing.

26          17.      On January 21, 2025, the GA news website Avweb published an article discussing  
27 the FAA’s investigation of G100UL at KWVI. The article states, “Inspectors looked at several  
28 planes involved at Watsonville Airport south of San Francisco. Various incidents of peeling

1 paint, leaking fuel tanks and even a bent pushrod/seized valve have been reported in various  
2 forums.” A true and correct copy of this article is attached hereto as **Exhibit C**. This article is  
3 may be accessed at [https://www.avweb.com/aviation-news/faa-looking-into-possible-g100ul-fuel-](https://www.avweb.com/aviation-news/faa-looking-into-possible-g100ul-fuel-issues/)  
4 [issues/](https://www.avweb.com/aviation-news/faa-looking-into-possible-g100ul-fuel-issues/)

5 18. My aircraft has been heavily damaged, and I still do not know the long term  
6 effects on my engine. My aircraft’s tanks have been compromised, and its paint has been heavily  
7 damaged.

8 19. To the best of my knowledge based on prevailing rates in the Northern California  
9 market, the costs of restoring my aircraft to its prior state are approximately \$100,000. Obtaining  
10 a new engine would cost approximately \$60,000 - \$70,000. A new paint job would cost  
11 approximately \$20,000. Resealing the leaking tanks would cost approximately \$10,000.

12  
13 I declare under penalty of perjury under the laws of the State of California that the  
14 foregoing is true and correct. Executed this 22nd day of January 2025, at Felton, California.

15  
16 By: *Gabriele Zingaretti*  
Gabriel Zingaretti

# **EXHIBIT A**



All ▾

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Registration/Tail #

N57227

View Aircraft Registration

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Want more information about this aircraft? You might be interested in our FBO ToolBox service. [Click here.](#)

# N57227 Aircraft Registration

## Aircraft Summary

### Summary

1983 MOONEY AIRCRAFT CORP. M20K  
Fixed wing single engine  
(4 seats / 1 engine)

### Owner

ZINGARETTI GABRIELE  
FELTON, CA, US

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**Weight**

Less than 12,500lbs

**Speed**

Not defined

**Mode S Code**

051654225 / A75895

**Registration Details****Status**

Assigned

**Certificate Issue Date**

2022-07-30

**Airworthiness Date**

1983-12-22

**Last Action Date**

2022-07-30

**Expiration**

2025-07-31

**Registry Source**[FAA](#)

## Registration History

Date	Owner	Location
01-Aug-2022	ZINGARETTI GABRIELE	FELTON CA
22-Feb-2021	N57227 LLC	TERRE HAUTE IN
29-Aug-2009	SMITH STEVEN W	DENTON TX
27-Jul-2007	SMITH STEVEN W	DALLAS TX
02-Jun-2006	BAHR C CHARLES	VALLEY VIEW TX

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# **EXHIBIT B**



# **General Aviation Modifications, Inc.**

**2800 Airport Rd. Hangar A**

**Ada, OK 74820**

**580 436-4833**

**Fax 580 436-6622**

**November 18, 2024**

**To aircraft owners at Watsonville Municipal Airport:**

**Re: *G100UL*® Avgas is coming to Watsonville!**

There is some exciting news regarding the availability of the *first and only* FAA certified High Octane, Unleaded Aviation Gasoline!

KWVI is about to roll-out *GAMI's G100UL* avgas! To celebrate this occasion some special incentives are being offered for a limited time.

As you may already know, *G100UL* high octane avgas has been approved by the FAA for use in all spark-ignition piston engines and airplanes in the FAA type-certificate database. By FAA regulation, certified airplanes may legally use *G100UL* avgas with the associated STCs for the engine and the airframe. GAMI devoted 12+ years of intensive engineering and certification effort in order to obtain the fleet wide approval for *G100UL* avgas.

For most aircraft, the *G100UL* STC set (engine and airplane) is priced similarly to the typical cost of a tank of fuel. However, residents of KWVI who purchase a *G100UL* STC between now and Midnight on November 22<sup>nd</sup>, 2024 will receive a **full refund** of the purchase of that set of STCs. In addition, GAMI will provide the services of an IA at the EAA hangar at KWVI during the day on Saturday, November 23<sup>rd</sup>, to “sign-off” the required Form 337 at no charge.

In order to receive the free IA signoff, residents will need to appear in person at the *G100UL* rollout event which is currently scheduled to be held at the EAA hangar at KWVI on Saturday, November 23<sup>rd</sup> from 9am to 5pm.

This incentive is designed to equip as many aircraft on the field at KWVI as possible with the *G100UL* STCs, and allow you an early opportunity to begin operating your aircraft engine on lead free, high octane aviation gasoline.

A) In order to participate in this STC promotion, you need to do the following 3 things:

1. Send an email to [KWVI@G100UL.com](mailto:KWVI@G100UL.com) stating your intention to participate and *approximately* what time on Saturday you would like to be there to have the IA sign off your paperwork, if you plan to take advantage of the IA signoff. Please put your tail number in the subject line! Note: Lots of people will indicate showing up at 9-10am.

2. Go to <https://stc.G100UL.com> and purchase the STC for your aircraft. The online STC order form is very straightforward, but if you have any issues, please email [cs@G100UL.com](mailto:cs@G100UL.com) for prompt assistance. Your STC and pre-filled FORM 337 paperwork will be emailed to you within minutes. The refund will be processed to your credit card as soon as possible (within a day or two). NOTE: You will need the N number and the engine serial number(s) in order to complete the on-line purchase of the STCs. You can find the engine serial number in the log books or on the data plate on the engine.
3. Arrive at KWVI next Saturday, at or around the time you designated in your email. Please bring your printed copies of your downloaded FORM 337 and other paperwork with you. We will supply the Approved Flight Manual Supplement and required aircraft placards when you arrive on Saturday.

You are each encouraged to buy some fuel and see for yourself that it operates no differently than the 100LL you are accustomed to, with the advantages of a cleaner engine, cleaner spark plugs, cleaner air, and reduced engine wear.

- B) To further expand this opportunity, the airplane owners at your neighboring airports\* (listed below) who each have purchased the *G100UL* Avgas STC, have not already received a voucher for free G100UL, and who fly into KWVI and purchase *G100UL* Avgas on November 23rd, will receive 25 gallons of free *G100UL* avgas.

<b>OAR</b>	<b>MARINA, CA</b>	<b>MARINA MUNICIPAL AIRPORT</b>
<b>1C9</b>	<b>HOLLISTER, CA</b>	<b>FRAZIER LAKE AIRPARK AIRPORT</b>
<b>CVH</b>	<b>HOLLISTER, CA</b>	<b>HOLLISTER MUNICIPAL AIRPORT</b>
<b>SNS</b>	<b>SALINAS, CA</b>	<b>SALINAS MUNICIPAL AIRPORT</b>
<b>MRY</b>	<b>MONTEREY, CA</b>	<b>MONTEREY REGIONAL AIRPORT</b>

\* Please consider asking your airport management to bring G100UL Avgas to your airport!

If you have any questions, send an email to [KWVI@G100UL.com](mailto:KWVI@G100UL.com).

Thank you for supporting our efforts to bring high octane unleaded avgas to general aviation by being the first airports in the nation to have commercial access to *G100UL* avgas!

**General Aviation Modifications, Inc.**

# **EXHIBIT C**



Home / Aviation News

AVIATION NEWS

# FAA Looking Into Possible G100UL Fuel Issues

FAA inspectors were at a California airport inspecting potential damage reports.



**RUSS NILES** Updated Jan 21, 2025 5:33 AM EST



Credit: General Aviation Modifications, Inc. (GAMI)

SHARE THIS STORY 

The FAA is now reportedly investigating reports of damage to aircraft related to their use of GAMI's G100UL unleaded fuel in California. Inspectors looked at several planes involved at Watsonville Airport south of San Francisco. Various incidents of peeling paint, leaking fuel tanks and even a bent pushrod/seized valve have been reported in various forums.

GAMI is responding to inquiries and doing its own materials testing and is encouraging operators who believe the fuel is affecting their aircraft to report incidents. G100UL is being sold at Watsonville and Reid-Hillview Airport near San Jose. More than 100 airplanes at those fields and some from neighboring airports have the STC that allow them to use the unleaded gas.

SHARE THIS STORY 



**Russ Niles**

EDITOR

Russ Niles is Editor-in-Chief of AVweb. He has been a pilot for 30 years and joined AVweb 22 years ago. He and his wife Marni live in southern British Columbia where they also operate a small winery.



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Crew-1 NASA SpaceX Crew Dragon Mission Sticker

\$2.50

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[Continue Discussion - visit the forum](#)

14 replies

**tommy**

January 21

What a F— up... this is par for the course. Yeah, we'll get the lead out. What a fricking joke. And the clown show continues...

**Andrew\_M**

January 21

Getting more real world experience with G100UL is a good thing. I have the GAMI STC for my Maule but I haven't run any G100UL since it's not available in my area. Although GAMI did a huge amount of testing, running G100UL in a larger variety of aircraft, engines and flight operations over time will allow them to fine tune the fuel formulation, if necessary. I would like that to happen before I actually run G100UL in my Lycoming engine. I'm not worried about the manufacturer not honoring the warranty since my engine is long out of warranty. Most GA engines are out of warranty. According to the FAA, the average age of 150,000+ GA aircraft is over 50 years. We MUST get rid of the lead in aviation fuel just like we got rid of it in automobile fuel, which didn't happen overnight. Getting G100UL into widespread use and closely monitoring engine health is the best way to gather more data about its effects and how to adjust the formulation to prevent engine damage. Instead of taking potshots at GAMI's fuel effects, we should be trying to help them make it safer.

**gmbfly98**

January 21

The difficult part now will be separating out all of the normal wear and tear aircraft go through from the issues that are *actually* related to the fuel.

**George\_Dyer**

January 21

First, airport neighbors complained about lead falling on their property, next they will complain about aluminum.

**art**

January 21

It took the EAA from 1964 to 1982 (18 years) to convince the FAA it was safe to run mogas in an airplane. To this date, there are numerous airframe/engine combinations that do not qualify (eg PA28-181/O360). Petersen has expensive fuel system modifications to get PA28 STC and each airframe engine combination has to be tested before the FAA approves an STC for the airframe/engine combination.

There shouldn't be a surprise that things might come up with a blanket STC for all airframe/engine combinations unless GAMI has tested all of the many hundreds (or more) combinations, some with post factory mods themselves. I'm glad they're doing the big experiment in California and not where I am.

**brian1**

January 21

Casting aspersions is not productive. We are going to have to move to unleaded fuel and taking the Luddite approach is not productive.

The big problem with these reports is determining causality. Peeling paint and staining is probably more of an issue with old and worn-out paint than anything else. Valve sticking is a long-time issue with Lycoming engines. Suddenly introducing an unleaded fuel at 1000 hours into a Lycoming engine and then blaming the fuel for a stuck valve is unreasonable. Did you do the wobble test before switching fuel? No? Huh.

So, let's focus on light instead of heat. GAMI seems to be doing that. They have put more effort into fuel and combustion in aircraft engines than anyone else I know of. I really would like to see them taking the lead (unavoidable pun) on this. They know what they are doing. I'm a back pilot, uh, not so much.

they are doing. Joe O-pack pilot, um, not so much.

[1 reply](#)



**brianhope**

January 21

Luddites trying to blame their poor maintenance on something new. Lawyers licking their lips; a very American problem.

Lead is bad for people and engines; we know that.

The Fuel companies and distributors don't want to lose the extremely profitable 100 octane fuel market, so they encourage this kind of nonsensical attack!

[1 reply](#)



**Ehsif727**

[▶ brianhope](#) January 21

UL 94 will be the answer to the lead problem. Get ready to modify your engines with water injection.



**jbmcmamee**

24h

Anyone who has ever tried to roll out a new product to the market knows that, no matter how much testing you do, there will be some wrinkles and issues once you go public. Just ask Swift Fuels about that. As Brian1 said, it will be a challenge to determine whether any problems are truly related to the new fuel or just an incipient problem that suddenly appears. To be truly scientific, a pilot considering the switch to G100UL, or any other upcoming unleaded fuel, would be wise to thoroughly inspect his engine and fuel system to see if there are any issues brewing prior to the switch.



**johnbmcg**

22h

As one who has been at ground zero (Reid Hillview) since the battle to close the airport started in 2016, and lead became the PR Weapon in 2021, it is important to remember two very important things. First, while not lovable, lead in Avgas is not killing people or harming kids, as it remains nearly undetectable relative to other sources of airborne lead and lead stirred up from the ground. And second, the unleaded Avgas race is like Betamax v. VHS with two companies competing to be the standard, using very different formulas. GAMI came out of the blocks first, by skipping a lot of testing, and Swift is catching up, with a product that has no signs of airframe or sealant/plastic damage. 2025 should be the year a winner emerges, and the drama will die down as the complexities of rolling out unleaded avgas progress...

[1 reply](#)



**Brian\_Hall**

21h

This again points to the need of STANDARIZED testing, i.e., ASTM.



**gmbfly98**

21h



[johnbmcg@aol.com](mailto:johnbmcg@aol.com):

GAMI came out of the blocks first, by skipping a lot of testing, and Swift is catching up, with a product that has no signs of airframe or sealant/plastic damage.

First, it's inaccurate to say that GAMI "skipped a lot of testing", when that testing took place over 10 years. The FAA doesn't just assign widespread STC approval without a lot of engineering data to back it up. G100UL is probably one of the *most* tested aviation fuels on the market.

Second, there were "no signs of airframe or sealant/plastic damage" for G100UL until it came to market, so who's to say there won't be similar signs of concern when 100R



eventually makes it to wide-spread market?'

1 reply



26981

▶ [brian1](#) 12h

The greater impact is on rubber. O rings and fuel bladders. The main substance that is used to bump the octane is Toluene which is a solvent. Toluene also degrades wet wing

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## AVweb insider

AVWEB INSIDER

### Analog, For the Right Reason

Back to basics for a few lucky students.

KEVIN GARRISON

---

## Poll

Poll: Ever Clap For A Landing?

- No. It's insulting.
- Sure. Everyone likes applause.
- If it's a nine or a 10.
- If the weather is rough.

SUBMIT

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### Best Of The Web: Ukrainian Ace

A Ukrainian air force pilot became an ace in one sortie, bucking the current wisdom about integration of the F-16.

EDITORIAL STAFF

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RUSS NILES



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MARK PHELPS

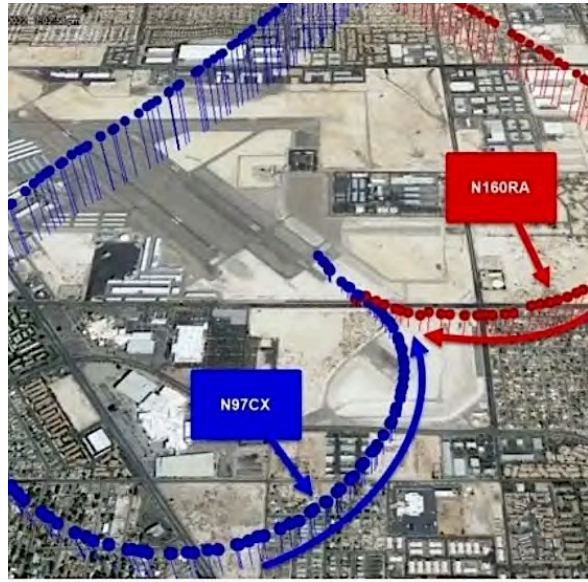




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