

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,	:	
	:	CASE NO. 1:07-cv-4538
Plaintiff,	:	
	:	Hon. Elaine E. Bucklo
v.	:	
	:	Magistrate Judge Arlander Keys
	:	
BRIAN N. HOLLNAGEL and BCI AIRCRAFT LEASING, INC.	:	
	:	
Defendants.	:	

**PLAINTIFF UNITED STATES SECURITIES AND EXCHANGE COMMISSION'S
MOTION FOR ORDER TO SHOW CAUSE**

Plaintiff, United States Securities and Exchange Commission (“SEC”), respectfully moves this Court for an order to show cause why Defendants Brian N. Hollnagel (“Hollnagel”) and BCI Aircraft Leasing, Inc. (“BCI”) (collectively “Defendants”) should not be held in contempt of the Court’s August 22, 2007 Order (“Order”) in light of their multiple violations of the Order.¹ Defendants are not repaying all of the investors in cash as required by the Order. Defendants have also failed to comply, and continue to fail to comply, with the reporting requirements in the Order. Defendants appear to believe they are not required to comply with those provisions of the Order, have provided virtually no supporting information or documents to the SEC necessary to its role as monitor, and have misled the Court regarding their ability to repay investors. It also appears that Defendants have conducted new fraudulent securities sales, in violation of the Order and the federal securities law.

¹ This Motion to Show Cause also serves to correct misstatements and misleading statements in Defendants’ September 19th Surreply, Docket No. 47. In addition, as part of the SEC’s monitoring role under the Order, this filing serves as an updated report to the Court regarding Defendants’ progress in repaying investors.

