

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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U.S. DISTRICT COURT E.D.N.Y.

★ JAN 26 2010 ★

BROOKLYN OFFICE

UNITED STATES SECURITIES AND  
EXCHANGE COMMISSION,

Plaintiff,

v.

EAST DELTA RESOURCES CORP.,  
VICTOR SUN,  
DAVID AMSEL, AND  
MAYER AMSEL

Case No.

CV 10 - 0310

FEUERSTEIN, J.

COMPLAINT

WALL, M.J.

Plaintiff Securities and Exchange Commission (the "SEC" or "Commission")  
alleges as follows against the Defendants named above:

SUMMARY OF CASE

1. This is a market manipulation case involving a penny stock, East Delta Resources Corp. ("East Delta" or the "Company"), whose shares were quoted on the Pink Sheets and OTC Bulletin Board during the relevant period. The manipulation was mainly perpetrated by East Delta's CEO, Victor Sun, and two brothers, David and Mayer Amsel, who were Company consultants. From 2004 through at least 2006, the Defendants pumped up the volume of market activity of East Delta stock and illegally sold East Delta shares that they had received from East Delta at little or no cost. The fraudulent proceeds from this scheme totaled more than \$1,400,000.

2. Each of the Defendants participated in one or more frauds. From 2004 through at least 2006, Mayer Amsel manipulated the volume of market activity of East Delta stock through wash sales, matched orders, and other manipulative trading, to give

the market the false impression that there was real demand for East Delta shares. Mayer Amsel at various times since 2004 used multiple brokerage accounts opened in his own and his brother's name to churn and ultimately sell for a profit purportedly unrestricted stock that he and his brother David had received from East Delta, Sun and others. Mayer Amsel also enlisted others who were compensated with East Delta shares and cash to engage in manipulative trading.

3. From 2004 through at least 2006, David Amsel directed and participated in the scheme to manipulate the market for East Delta's stock. By no later than 2004, David Amsel gave his brother Mayer full authority to trade stocks in his Canadian and U.S. brokerage accounts. With David Amsel's knowledge, Mayer Amsel used that authority to make wash trades of East Delta stock – trading East Delta stock from one Amsel account to another. In addition, David Amsel provided funds and purportedly unrestricted East Delta shares to Mayer Amsel to facilitate his manipulative activity. David Amsel also compensated and promised to compensate others for manipulative trading. From 2004 through 2006, while Mayer Amsel and others were engaged in manipulative trading, David Amsel also wrote and issued materially false and misleading and touting press releases about East Delta and filed materially false and misleading annual reports with the SEC. David and Mayer Amsel together earned at least \$800,000 from the fraudulent scheme.

4. From 2004 through at least 2006, Victor Sun participated in the scheme to manipulate the market for East Delta's stock. He also wrote and issued false and misleading press releases about East Delta and signed and filed false and misleading annual reports with the SEC. Beginning in 2004, Victor Sun provided purportedly

unrestricted East Delta shares that he secretly controlled to David and Mayer Amsel, which they used to manipulate the market for East Delta shares and to earn profits for themselves. Among other things, in August 2004, Victor Sun caused the company to improperly register on Form S-8 one million East Delta shares provided to Mayer Amsel, which Mayer Amsel used for manipulative trading of East Delta. Victor Sun earned at least \$600,000 from the fraudulent scheme.

5. East Delta, by and through Victor Sun and David Amsel, participated in the fraudulent market manipulation scheme. East Delta issued false and misleading press releases and filed materially false and misleading annual reports with the SEC. East Delta also illegally issued shares to the Amsels, Victor Sun and others to use for market manipulation, to compensate persons for market manipulation and to earn illegal profits. East Delta also failed to timely file annual and quarterly reports with the Commission.

6. The foregoing conduct violated Sections 5(a), 5(c), and 17(a) of the Securities Act of 1933 ("Securities Act") [15 U.S.C. §§ 77e(a), 77e(c) & 77q(a)], Sections 10(b), 13(a), and 16(a) of the Securities Exchange Act of 1934 ("Exchange Act") [15 U.S.C. §§ 78j(b) & 78m(d)], and Rules 10b-5, 12b-20, 13a-1 and 13a-13, 13a-14 and 16a-3 thereunder [17 C.F.R. §§ 240.10b-5, 240.12b-20, 240.13a-1 and 240.13a-13, 240.13a-14 and 240.16a-3].

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7. The Commission seeks to have the Court enter judgments permanently enjoining Defendants from violating the securities laws, requiring an accounting and the payment of disgorgement plus prejudgment interest, requiring the payment of civil monetary penalties, barring Sun and the Amsels from participating in future penny stock offerings, and barring Sun and David Amsel from serving as an officer or director of a

registered issuer.

8. Each of the Defendants will continue to violate the securities laws unless permanently restrained and enjoined from doing so.

### **JURISDICTION AND VENUE**

9. The Court has jurisdiction over this action pursuant to Sections 20(b), 20(d) and 22(a) of the Securities Act [15 U.S.C. §§ 77t(b), 77t(d) and 77v(a)] and Sections 21(d), 21(e) and 27 of the Exchange Act [15 U.S.C. §§ 78u(d), 78u(e) and 78aa].

10. The Eastern District of New York is a proper venue for this action because certain of the acts and transactions at issue in this action occurred in this District. For example, Mayer Amsel engaged in substantial manipulative trading in the stock of East Delta using a brokerage account at Kensington Capital in Brooklyn, New York. Mayer Amsel during the time of the conduct alleged in the Complaint was, and is believed to still be, a resident of Brooklyn, NY.

11. Defendants, directly or indirectly, made use of the means and instrumentalities of interstate commerce, the means and instruments of transportation and communications in interstate commerce, and the mails in connection with the acts, practices, and courses of conduct alleged herein.

### **DEFENDANTS**

12. Defendant **East Delta Resources Corp.** is a Delaware corporation. Its common stock is registered with the Commission pursuant to Section 12(g) of the Exchange Act [15 U.S.C. § 78l(g)]. During the relevant period its stock was a penny stock (as defined by Section 3(a)(51) of the Exchange Act and Rule 3a51-1 thereunder

[15 U.S.C. § 78c(a), 240 C.F.R. § 3a51-1] quoted on the OTC Bulletin Board and the Pink Sheets under the symbol EDLT. East Delta operated from an office in Montreal, Canada and claimed to own and/or operate gold and other mineral mining properties in China. On January 13, 2010, the Commission pursuant to Section 12(k) of the Securities Exchange Act of 1934 (the “Exchange Act”) [15 U.S.C. § 78l(k)] temporarily suspended the trading of the securities of East Delta.

13. Defendant **Mayer Amsel** is a citizen of Canada and a resident of the U.S. During the relevant time period, Mayer Amsel resided in Brooklyn, New York and was a consultant to East Delta. He is Defendant David Amsel’s younger brother.

14. Defendant **David Amsel** is citizen of Canada and a resident of Montreal, Canada. During the relevant period he was a self-described consultant to and investor relations contact for East Delta. He is Defendant Mayer Amsel’s older brother.

15. Defendant **Victor Sun** is a citizen of Canada and a resident of suburban Montreal, Canada. During the relevant period he was a Director and Chief Executive Officer of East Delta.

#### **OTHER RELEVANT ENTITIES**

16. During the relevant period BDV International was a Hong Kong business controlled by Victor Sun’s sister, Yik Yiu Sun.

17. Avic Technologies (“Avic”) was the predecessor in name to East Delta. It was incorporated in Delaware in 1999. East Delta merged with Avic in 2004.

18. During the relevant period Golden Capital Corp. (“Golden”) was a registered broker-dealer located in Vancouver, British Columbia, Canada. David and Mayer Amsel each had accounts at Golden. David Amsel authorized Mayer Amsel to

trade East Delta and other stocks at his discretion in his Golden account.

19. During the relevant period Canaccord Capital Corp. ("Canaccord") was a registered broker-dealer located in Montreal, Quebec, Canada. David and Mayer Amsel each had accounts at Canaccord. David Amsel authorized Mayer Amsel to trade East Delta and other stocks at his discretion in his Canaccord account.

20. During the relevant period Kensington Capital Corp. ("Kensington") was a registered broker-dealer located in Brooklyn, New York. From at least January 2004 through May 2005, David Amsel maintained an account at Kensington. David Amsel authorized Mayer Amsel to trade East Delta and other stocks at his discretion in his Kensington account.

### **FACTS**

21. The scheme to manipulate the market for East Delta stock began by 2004 and continued through at least December 2006.

#### **Distribution of Unregistered Securities**

22. In February 2004, Victor Sun sold and transferred to David Amsel 1,014,000 East Delta shares. These sales were not registered with the Commission and were not exempt from registration. Before he sold and transferred them, Victor Sun controlled the shares but held them in the names of others. David Amsel deposited 614,000 of the East Delta shares received from Victor Sun in his Golden account and 400,000 of the shares in his Kensington account. As further explained below, Mayer Amsel, with David Amsel's knowledge, used the shares deposited by his brother David to execute wash and matched trades to create the false impression of market interest in East Delta shares and to earn profits for himself and David Amsel.

23. On August 30, 2004, Victor Sun and David Amsel caused the Company to issue to Mayer Amsel one million additional East Delta shares. To register the transaction with the Commission on a Form S-8, David Amsel wrote and Victor Sun and Mayer Amsel signed a consulting agreement (filed with the Form S-8) that falsely stated that the shares were to compensate Mayer Amsel for future consulting activities related to East Delta's mining business. In fact, as David Amsel and Victor Sun knew, Mayer Amsel was hired to introduce East Delta to brokers and promoters, create liquidity in the market for East Delta and solicit investors for East Delta, a prohibited use of a Form S-8 registration statement. Mayer Amsel sold the shares he received under the false Form S-8 to the public from his and his brother's various brokerage accounts in New York and Canada as part of the manipulative trading explained below in paragraphs 25-28. Because the Form S-8 was fraudulent, the shares issued to and sold by Mayer Amsel violated the registration provisions of the securities laws.

24. In 2005, Victor Sun sold and distributed in unregistered, non-exempt transactions approximately 3.7 million shares of East Delta that he controlled but held in the name of his sister-in-law. These transactions occurred in a scheme to distribute shares into the public market and to raise money that Sun used for various purposes.

#### **Mayer Amsel Manipulates the Market for East Delta**

25. Beginning no later than April 2004, Mayer Amsel began making manipulative trades of East Delta shares to create the false appearance of an active and liquid market for the shares and raise or stabilize the stock price. As Mayer Amsel engaged in this trading (and along with the other manipulative efforts by David Amsel and Sun described below), East Delta's share price generally moved upward from around

\$.25 in early 2004 to a high of just above \$1 in September 2005 and February 2006.

Mayer Amsel effected his manipulation with the millions of S-8 and other purportedly unrestricted shares described above that he received from his brother David Amsel and Sun. Mayer Amsel conducted his trading in and among his and his brother's brokerage accounts in the U.S. and Canada, and coordinated his trading with various other individuals, many of whom he, his brother and Sun had provided with East Delta stock and/or cash.

26. Between January 2004 and June 2006 — based on how often he traded and the percentage of overall trading volume his trades comprised — Mayer Amsel dominated and controlled trading in East Delta. On many days in 2004, Mayer Amsel executed wash trades — simultaneous or near simultaneous buying of East Delta shares in one Amsel account and selling from another Amsel account. Such trades sometimes were the dominant or only activity in the market for East Delta. Mayer Amsel also manipulated the market for East Delta stock in 2004 by matching his trades with others working with him and directing the activities of certain market makers of East Delta. This activity also created the false impression of an increased demand in East Delta shares. Mayer Amsel continued this pattern of manipulative trading during 2005 and into 2006.

27. David Amsel and Victor Sun knew or were reckless in not knowing that Mayer Amsel was manipulating the market for East Delta shares. As described above, David Amsel and Sun provided him purportedly unrestricted shares of East Delta knowing that he would and did trade them to bolster the market for the stock and they encouraged his manipulation in other ways.



28. At least as early as July 2006, Victor Sun, David Amsel and his brother Mayer Amsel arranged for East Delta to pay third parties to buy East Delta shares in order to create the false impression of an active and liquid market for the stock. No later than July 2006, David Amsel hired an "investor relations consultant" to buy or find buyers for 500,000 to 1,000,000 East Delta shares. No later than January 2007, David Amsel and Mayer Amsel made an agreement to pay a commission in East Delta shares of 20% of all East Delta shares purchased in the open market by foreign investor relations consultants and others.

#### **Campaign of False Information**

29. From 2004 into 2007, Sun and David Amsel mounted a campaign of false and misleading press releases about East Delta's mining business to accompany the ongoing manipulation described above. Numerous East Delta press releases made false claims that East Delta owned a producing gold mine, the Huaqiao mine, in China and would soon see revenue from the mine, and made unfounded claims about minable gold at it and another mine site called Bake. Sun and David Amsel prepared these press releases together. Sun was often quoted in the releases, and David Amsel was routinely named as East Delta's investor contact. The press releases were routinely posted on East Delta's website, which was maintained by David Amsel, and sometimes the claims in the press releases were repeated in East Delta's Commission filings, which David Amsel prepared and Victor Sun signed and certified as East Delta's CEO.

30. In 2004, David Amsel and Victor Sun made at least three unfounded and false claims in East Delta press releases that 1,000,000 ounces of minable gold existed on the Bake property in China that the press release claimed East Delta owned or partly

owned. In the early summer of 2005, Sun and David Amsel further falsely claimed that East Delta had purchased a producing gold mine, the Huaqiao mine (“Huaqiao”), and that Huaqiao would produce revenue in ninety days or otherwise in the near future. David Amsel and Sun issued four more East Delta press releases containing false statements about owning Huaqiao in 2005, and the Company’s press releases into 2006 and 2007 continued to maintain that Huaqiao was East Delta’s premier mine and would soon be producing gold and revenue.

31. On February 8, 2006, David Amsel and Victor Sun issued an East Delta press release that announced inferred resources of 300,000 ounces of gold and a definitive agreement to acquire 77.5% of Huaqiao. Upon release of the information, East Delta’s share price rose more than 30% and the volume of trading increased over 800%, from 341,905 shares to 2,847,465 shares. At the same time, the Amsels sold 90,500 shares, taking advantage of the elevated price and volume for gross proceeds of approximately \$93,000.

32. David Amsel and Sun knew the claims in the press release were false. David Amsel prepared and Sun signed East Delta’s Form 10-K for the nine months ended December 31, 2005 filed on June 19, 2006, which stated that East Delta had not yet confirmed the amount of gold at Huaqiao nor whether it could be mined economically. In addition, Sun and Amsel knew that East Delta’s deal to acquire the mine was in doubt. Among other things, East Delta’s Form 10-K for 2005 stated that East Delta’s deposit of \$150,000 had been expensed due to the uncertainty of the closing of the acquisition.

#### **The Amsels and Sun Family Profit from the Scheme**

33. From February 2004 through June 2006, David Amsel and Mayer Amsel

sold at least three million East Delta shares into a market manipulated by the activity of Mayer Amsel and his associates, propped up by third parties paid by East Delta, and misled by the false statements that Sun and David Amsel made in press releases and elsewhere. Proceeds from sales of East Delta shares in David and Mayer Amsel's brokerage accounts were at least \$800,000 for the period from January 2004 through June 2006. In the same period, Victor Sun and his family realized at least \$600,000 from sales of East Delta securities. The Amsel brothers received and sold additional East Delta shares after June 2006.

#### **Failure to File Required Reports and Filing False Reports**

34. During 2004, 2005 and 2006, East Delta failed to report, or falsely reported the securities holdings of Victor Sun and failed to report related party transactions between the Company and BDV International, an entity that during the relevant period was located in Hong Kong and controlled by Sun's sister.

35. As noted above, during the relevant period Victor Sun controlled millions of East Delta shares that he held in the names of others. In 2003 and into 2005, he controlled 4.7 million East Delta shares held in the name of his sister-in-law and he controlled at least 1 million of his sister-in-law's shares from 2005 through 2006. In addition, at least until February 2004, he held approximately 1 million shares in the names of other persons. East Delta failed to report Sun's ownership of these shares in its Forms 10-K filed with the Commission in 2004, 2005, 2006 and 2007. In addition, Victor Sun never reported on Forms 3 his initial ownership of shares he controlled in his sister-in-law's name nor did he report on Form 4 changes to his ownership of these shares when he sold the shares in 2004 and 2005. If Sun and East Delta accurately reported the

shares he controlled but held in the names of others, then Sun's share of ownership of East Delta would have been revealed to be much larger than East Delta reported to the investing public in its filings with the Commission. David Amsel prepared East Delta's Forms 10-K and knew that they did not accurately report the East Delta shares that Sun owned because David Amsel had advised Sun on how to sell the shares Sun controlled that were in Sun's sister-in-law's name.

36. East Delta in its Forms 10-KSB for years 2004, 2005 and 2006 also failed to report related party transactions between East Delta and BDV International, which was controlled by Sun's sister. East Delta did not report cash payments greater than \$60,000 it made to BDV in 2005 and 2006, and failed to report East Delta stock valued at greater than \$60,000 issued in 2004 and 2005 to BDV as compensation for services.

37. In addition to filing false and misleading reports, East Delta has failed entirely to file its required annual report for 2008 and quarterly reports for the first three quarters in 2009 to the Commission.

38. As noted above, David Amsel prepared and Victor Sun signed all of East Delta's reports to the Commission during the relevant period. In addition, Victor Sun certified under Section 302 of the Sarbanes-Oxley Act the accuracy of all of East Delta's reports to the Commission.

### **FIRST CLAIM**

#### **Violations of Section 17(a) of the Securities Act**

**(Defendants East Delta, David Amsel, Mayer Amsel and Victor Sun)**

39. Paragraphs 1 – 38 are hereby incorporated by reference.

40. Defendants East Delta, David Amsel, Mayer Amsel and Victor Sun

knowingly or recklessly, directly or indirectly, in the offer and sale of securities, by the use of any means or instruments of transportation or communication in interstate commerce, or by the use of the mails:

- a. employed devices, schemes or artifices to defraud;
- b. obtained money or property by means of any untrue statements of material fact, or have omitted to state material facts necessary in order to make the statements made, in light of the circumstances under which there were made, not misleading; and/or
- c. engaged in transactions, practices, or courses of business which operated or would operate as a fraud or deceit upon the purchasers of securities.

41. By engaging in the foregoing conduct, Defendants East Delta, David Amsel, Mayer Amsel and Victor Sun violated, and unless restrained and enjoined will continue to violate, Section 17(a) of the Securities Act [15 U.S.C. § 77q(a)].

### **SECOND CLAIM**

#### **Violations of Exchange Act Section 10(b) and Rule 10b-5**

**(Defendants East Delta, David Amsel, Mayer Amsel and Victor Sun)**

42. Paragraphs 1 – 41 are hereby incorporated by reference.

43. Defendants East Delta, David Amsel, Mayer Amsel and Victor Sun knowingly or recklessly, in connection with the purchase or sale of securities, directly or indirectly, by the use of any means or instrumentality of interstate commerce, or of the mails, or of any facility of a national securities exchange:

- a. employed devices, schemes or artifices to defraud;

- b. made untrue statements of material fact, or omitted to state material facts necessary in order to make the statements made, in light of the circumstances under which there were made, not misleading; and/or
- c. engaged in acts, practices, or courses of business which operated or would operate as a fraud or deceit upon any person in connection with the purchase or sale of any security.

44. By engaging in the foregoing conduct, Defendants East Delta, David Amsel, Mayer Amsel and Victor Sun violated, and unless restrained and enjoined will continue to violate, Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)] and Rule 10b-5 [17 C.F.R. § 240.10b-5], thereunder.

### **THIRD CLAIM**

#### **Violations of Sections 5(a) and (c) of the Securities Act**

**(Defendants East Delta, David Amsel, Mayer Amsel and Victor Sun)**

- 45. Paragraphs 1 – 44 are hereby incorporated by reference.
- 46. As described above, Defendants East Delta, David Amsel, Mayer Amsel and Victor Sun directly or indirectly, by the use of the means or instruments of transportation or communication in interstate commerce or by the use of the mails: (a) without a registration statement in effect as to the securities, sold such securities through the use or medium of a prospectus or otherwise, or carried or caused to be carried such securities for the purpose of sale or for delivery after sale; or (b) offered to sell or offered to buy through the use or medium of a prospectus or otherwise securities as to which a registration statement had not been filed.

47. By engaging in the conduct described above, Defendants East Delta, David Amsel, Mayer Amsel and Victor Sun violated, and unless restrained and enjoined will continue to violate, Sections 5(a) and (c) of the Securities Act [15 U.S.C. § 77e(a) & (c)].

#### **FOURTH CLAIM**

##### **Violations of Exchange Act Section 13(a) and Rules 12b-20, 13a-1 and 13a-13**

###### **(Defendants East Delta, David Amsel and Victor Sun)**

48. Paragraphs 1 – 47 are hereby incorporated by reference.

49. By engaging in the conduct described above, East Delta filed materially false and misleading reports on Form 10-KSB for the fiscal years ended December 31, 2003, March 31, 2005, December 31, 2005, December 31, 2006 and December 31, 2007.

50. By engaging in the conduct described above, East Delta failed to file required reports on Forms 10-KSB and 10-QSB for periods in 2008 and 2009.

51. By reason of the foregoing, East Delta violated Section 13(a) of the Exchange Act [15 U.S.C. § 78m(a)] and Rules 12b-20, 13a-1 and 13a-13 [17 C.F.R. §§ 240.12b-20, 13a-1 & 13a-13].

52. By reason of the foregoing, David Amsel and Victor Sun knowingly provided substantial assistance to East Delta and each aided and abetted East Delta's violation of Section 13(a) of the Exchange Act [15 U.S.C. § 78m(a)] and Rules 12b-20 and 13a-1. [17 C.F.R. §§ 240.12b-20 & 13a-1]

#### **FIFTH CLAIM**

##### **Violations of Exchange Act Section 16(a) and Rules 16a-3 and 16a-4**

###### **(Defendant Victor Sun)**

53. Paragraphs 1 – 52 are hereby incorporated by reference.

54. By engaging in the conduct described above, Victor Sun failed to file initial reports of his ownership of East Delta securities and failed to file reports of changes in his ownership of East Delta securities.

55. By reason of the foregoing, Victor Sun violated Exchange Act Section 16(a) [15 U.S.C. § 78p(a)] and Rule 16a-3. [17 C.F.R. §§ 240.16a-3]

**SIXTH CLAIM**

**Violations of Exchange Act Rule 13a-14**

**(Defendant Victor Sun)**

56. Paragraphs 1 – 55 are hereby incorporated by reference.

57. By engaging in the conduct described above, Victor Sun filed false and misleading certifications required by Exchange Act Rule 13a-14. [17 C.F.R. § 240.13a-14]

58. By reason of the foregoing, Victor Sun violated Section 13(a) of the Exchange Act [15 U.S.C. § 78m(a)] and Exchange Act Rule 13a-14. [17 C.F.R. § 240.13a-14]



## PRAYER FOR RELIEF

WHEREFORE, the Commission respectfully requests that this Court:

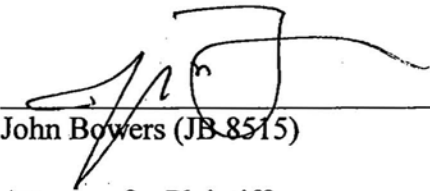
- a) permanently enjoin East Delta from violations of Sections 5(a), 5(c) and 17(a) of the Securities Act [15 U.S.C. §§ 77e(a), 77e(c) & 77q(a)] and Sections 10(b) and 13(a) of the Exchange Act [15 U.S.C. §§ 78j(b) & 78m(a)] and Exchange Act Rules 10b-5, 12b-20, 13a-1 and 13a-13 [17 C.F.R. §§ 240.10b-5, 12b-20, 13a-1 & 13a-13];
- b) permanently enjoining Mayer Amsel, David Amsel and Victor Sun from violating Sections 5(a), 5(c) and 17(a) of the Securities Act [15 U.S.C. §§ 77e(a), 77e(c) & 77q(a)] and from violating Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)] and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5];
- c) permanently enjoin Victor Sun and David Amsel from aiding and abetting violations of Section 13(a) of the Exchange Act [15 U.S.C. § 78m(a)] and Exchange Act Rules 12b-20 and 13a-1 [17 C.F.R. § 240.12b-20 & 13a-1];
- d) permanently enjoin Victor Sun from violating Section 16(a) of the Exchange Act [15 U.S.C. § 78p(a)] and Exchange Act Rules 16a-3 and 13a-14 [17 C.F.R. §§ 240.16a-3 & 13a-14];
- e) order Defendants East Delta, Mayer Amsel, David Amsel and Victor Sun to pay civil penalties under Securities Act Section 20(d) [15 U.S.C. § 77t(d)] and Exchange Act Section 21(d)(3) [15 U.S.C. § 78u(d)(3)];
- f) order Defendants East Delta, Mayer Amsel, David Amsel and Victor Sun to disgorge, with prejudgment interest, any ill-gotten gains and provide an accounting of monies they received;
- g) issue an order permanently barring David Amsel and Victor Sun, pursuant to Section 20(e) of the Securities Act [15 U.S.C. § 77t(e)] and Section 21(d)(2) of the Exchange Act [15 U.S.C. § 78u(d)(2)], from serving as an officer or director of any issuer that has a class of securities registered pursuant to Section 12 of the Exchange Act [15 U.S.C. § 78l] or that is required to file reports pursuant to Section 15(d) of the Exchange Act [15 U.S.C. § 78o(d)]; and
- h) prohibit Defendants Mayer Amsel, David Amsel and Victor Sun from engaging in any offering of penny stock pursuant to Securities Act Section 20(g) [15 U.S.C. § 77t(g)] and Exchange Act Section 21(d)(6) [15 U.S.C. § 78u(d)(6)];

i) grant such other relief as this Court may deem just and proper.

Respectfully submitted,

Of Counsel

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