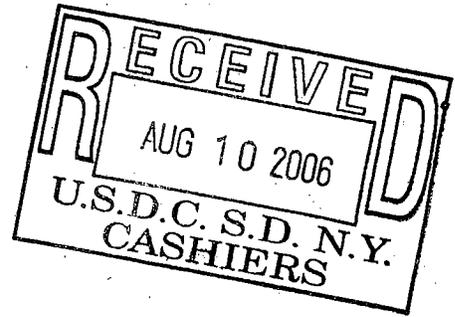


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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

DAVID E.Y. SARNA and ISAAC NUSSEN,

Defendants.

JUDGE HOLWELL

06 CV 6084

06 Civ. _____

COMPLAINT

PRELIMINARY STATEMENT

Plaintiff Securities and Exchange Commission ("Commission"), for its Complaint against defendants David E.Y. Sarna ("Sarna") and Isaac Nussen ("Nussen"), alleges as follows:

1. This matter concerns a fraudulent scheme, orchestrated by Sarna and Nussen, to manipulate the market for Aurora Medical Technology, Inc. ("Aurora") stock. Aurora is a publicly-traded Florida corporation, which purports to manufacture medical equipment and devices for patients suffering from congestive heart failure.

2. In May and June 2006, Sarna and Nussen participated in an undisclosed kickback arrangement with Individual A, a former stock promoter and business partner of Sarna, and

Individual B, whom Sarna and Nussen believed to be associated with a registered broker-dealer (“Brokerage Firm”).

3. In conversations with Individual A, Sarna and Nussen claimed that they control a majority of Aurora’s stock and that they were funding the company’s operations with sale proceeds of Aurora stock.

4. To generate additional stock sales and create trading volume in Aurora stock, Sarna and Nussen agreed to pay Individual A and Individual B an amount equal to 30% of Sarna’s and Nussen’s stock sale proceeds as a kickback for soliciting customers of the Brokerage Firm.

5. On June 8, 2006, in accordance with the illicit arrangement, Sarna and Nussen deposited 3,286,403 shares of Aurora stock into an account at the Brokerage Firm. On June 21 and 22, 2006, Individual B sold 83,000 and 56,000 Aurora shares, respectively, from Sarna and Nussen’s nominee account to other accounts at the Brokerage Firm. On July 3, 2006, Sarna and Nussen received the sale proceeds of approximately \$25,000. On July 6, 2006, Sarna and Nussen paid a kickback to Individual A with a \$7,500 check.

6. By virtue of their conduct, Sarna and Nussen violated Section 17(a) of the Securities Act of 1933 (“Securities Act”), 15 U.S.C. § 77q(a), Section 10(b) of the Securities Exchange Act of 1934 (“Exchange Act”), 15 U.S.C. § 78j(b), and Rule 10b-5, 17 C.F.R. § 240.10b-5.

JURISDICTION AND VENUE

7. The Commission brings this action pursuant to Section 20(b) of the Securities Act, 15 U.S.C. § 77t(b), and Section 21(d) of the Exchange Act, 15 U.S.C. §§ 78u(d), to enjoin Sarna and Nussen from engaging in the acts, practices and courses of business alleged herein. The Commission also seeks a judgment ordering Sarna and Nussen to disgorge ill-gotten gains with prejudgment interest thereon and to pay civil money penalties pursuant to Section 20(d) of the Securities Act, 15 U.S.C. § 77t(d), and Section 21(d)(3) of the Exchange Act, 15 U.S.C. § 78u(d)(3). The Commission also seeks such other relief as the Court may deem appropriate.

8. This Court has jurisdiction of this action pursuant to Sections 20(d) and 22(a) of the Securities Act, 15 U.S.C. §§ 77t(d) and 77v(a), and Sections 21(d) and 27 of the Exchange Act, 15 U.S.C. §§ 78u(d) and 78aa.

9. Venue in this District is proper pursuant to Section 22(a) of the Securities Act, 15 U.S.C. § 77v(a), and Section 27 of the Exchange Act, 15 U.S.C. § 78aa. Certain of the transactions, acts, practices, and courses of business alleged herein occurred within this District, and venue is proper. For example, Sarna and Nussen met with Individual A in New York City to discuss the kickback arrangement.

10. In connection with the transactions, acts, practices, and courses of business described in this complaint, Sarna and Nussen, directly or indirectly, have made use of the means and instrumentalities of interstate commerce, or of the mails, or of the facilities of a national

securities exchange, in connection with the transactions, acts, practices and courses of business alleged herein.

DEFENDANTS

11. David E.Y. Sarna, age 56, is a stock promoter and a Teaneck, New Jersey resident.
12. Isaac Nussen, age 57, is a Monsey, New York resident.

RELEVANT ENTITY

13. Aurora is a Florida corporation with its offices located in Bay Shore, New York. Aurora's stock began trading publicly on September 30, 1997, and until July 14, 2006, was quoted on the Pink Sheets. As of July 17, 2006, the company purportedly had 158,696,514 shares outstanding, 23,376,754 of which were unrestricted. Aurora's securities are not registered with the Commission.

FACTS

A. Background

14. Aurora, a development stage company, purportedly manufactures medical equipment and devices for patients suffering from congestive heart disease. According to an issuer information and disclosure statement that Aurora filed on May 8, 2006 with Pink Sheets, LLC, since its inception in 1997, Aurora has never made a profit and has an accumulated deficit of \$2,667,662.

B. Sarna and Nussen Enter into Illicit Arrangement

15. In May and June 2006, Sarna and Nussen agreed to pay kickbacks to Individual A, a stock promoter, and Individual B, whom Sarna and Nussen believed to be associated with the Brokerage Firm.

16. On May 2, 2006, Nussen, Sarna and Individual A met to discuss the scheme. At that meeting, Sarna and Nussen agreed to pay Individual A and Individual B a 30% cash kickback in exchange for creating demand for Aurora stock through customers of the Brokerage Firm. Sarna and Nussen subsequently agreed to open an account at the Brokerage Firm and deposit Aurora shares into the account. Sarna and Nussen promised they would pay the kickback immediately after Individual B transferred the stock sale proceeds to them at another broker-dealer.

17. On June 6, 2006, Sarna and Nussen with Individual A at a hotel located in New York City to discuss the kickback scheme. During the meeting, Sarna and Nussen provided account opening documents for their account at the Brokerage Firm. On June 8, 2006, Sarna and Nussen gave Individual A an Aurora stock certificate for 3,286,403 shares, dated June 7, 2006, and Sarna and Nussen opened a brokerage account using a corporate name at the brokerage firm.

18. Sarna and Nussen agreed to provide Individual A with a consulting agreement to conceal the true nature of the kickback payment. Sarna and Nussen knew that the consulting agreement was a sham. On June 7, 2006, Sarna provided Individual A with a sham consulting agreement.

19. On June 21, 2006, Sarna and Nussen sold 83,500 shares of Aurora stock (valued at approximately \$15,000) from their account at the Brokerage Firm to other accounts at the Brokerage Firm.

20. On June 22, 2006, Sarna and Nussen sold 56,000 shares of Aurora stock (valued at approximately \$10,000) from their account to other accounts at the Brokerage Firm.

21. Shortly after the June 22, 2006 trade, Nussen told Individual A that he would give Individual A a \$7,500 check as the kickback payment after receiving the sale proceeds. Nussen also told Individual A that he did not want to lose the trading "momentum" created by the sales of his stock.

22. On July 3, 2006, the Brokerage Firm transferred approximately \$25,000 from the stock sale proceeds to an account controlled by Sarna and Nussen. On July 6, 2006, Nussen gave Individual A a check for \$7,500 (or 30% of the sale proceeds). At that time, Nussen said that he and Sarna had been funding Aurora since December 2005 and that he and Sarna had agreed to pay the company \$100,000 per month. Nussen also told Individual A that he and Sarna needed money from Aurora stock sales to provide additional funding and that they expected to promote Aurora stock in the near future.

23. Sarna and Nussen believed that brokers at the Brokerage Firm would receive a portion of the kickback paid to Individual A and Individual B as compensation for soliciting purchases of Aurora stock from the Brokerage Firm's customers and that the brokers at the Brokerage Firm would not disclose the kickback arrangement to those customers.

24. From May 8, 2006 through July 14, 2006, Aurora traded at prices ranging from \$0.17 per share to \$0.29 per share.

25. During the week of June 12, 2006, only 600 shares of Aurora stock traded. The following week, on Monday, June 19, 2006, 10,000 shares of Aurora traded. On June 21 and June 22, 2006, the daily volume was 83,500 and 106,000 shares traded, respectively. No other trading in Aurora was reported during the week of June 19, 2006.

26. From June 19, 2006 through June 22, 2006, Aurora's average daily volume was 96,500 shares traded (compared with 23,200 shares average daily shares traded between May 8 and July 14, 2006).

27. On July 14, 2006, the Commission temporarily suspended trading of Aurora securities for ten days pursuant to Section 12(k) of the Exchange Act.

FIRST CLAIM FOR RELIEF

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

28. Paragraphs 1 through 27 are hereby realleged and incorporated by reference.

29. From at least May 2006 through July 11, 2006, Sarna and Nussen, in the offer and sale of securities, by the use of the means and instruments of transportation or communication in interstate commerce or by the use of the mails, directly and indirectly, employed devices, schemes and artifices to defraud.

30. From at least May 2006 through July 11, 2006, Sarna and Nussen, in the offer and sale of securities, by the use of the means and instruments of transportation or communication in interstate commerce or by the use of the mails, directly and indirectly, have obtained money and

property by means of untrue statements of material fact or omissions to state material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading, and have engaged in transactions, practices or courses of business which have operated, or would operate, as a fraud and deceit upon investors.

31. Sarna and Nussen knew, or were reckless in not knowing, that they engaged in manipulative and deceptive acts by paying kickbacks to Individual A and Individual B to create volume and induce purchases of Aurora stock.

32. By reason of the activities described herein, Sarna and Nussen have violated Sections 17(a) of the Securities Act, 15 U.S.C. §77q(a).

SECOND CLAIM FOR RELIEF
(Violations of Section 10(b) of the Exchange Act
and Rule 10b-5 thereunder)

33. Paragraphs 1 through 32 are hereby realleged and incorporated by reference.

34. Sarna and Nussen, directly and indirectly, by use of the means and instrumentalities of interstate commerce, or of the mails, or of the facilities of a national securities exchange, in connection with the purchase or sale of Aurora securities, knowingly or recklessly, has: (a) employed devices, schemes or artifices to defraud; (b) made untrue statements of material facts or omissions to state material facts necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading; or (c) engaged in transactions, acts, practices and courses of business which operated or would operate as a fraud or deceit upon purchasers of the securities referenced above.

35. Sarna and Nussen knew, or were reckless in not knowing, that they engaged in

manipulative and deceptive acts by paying kickbacks to Individual A and Individual B to create volume and induce purchases of Aurora stock.

36. By reason of the foregoing, Sarna and Nussen have violated Section 10(b) of the Exchange Act, 15 U.S.C. § 78j(b), and Rule 10b-5, 17 C.F.R. § 240.10b-5.

RELIEF REQUESTED

WHEREFORE, the Commission respectfully requests that this Court:

I.

Enter a final judgment of permanent injunction permanently restricting and enjoining Sarna and Nussen, and their agents, servants, employees, attorneys, attorneys in fact, and those persons in active concert or participation with them who receive actual notice of the injunction by personal service or otherwise, from violating, directly or indirectly, Section 17(a) of the Securities Act, 15 U.S.C. §77q(a), Section 10(b) of the Exchange Act, 15 U.S.C. §78j(b), and Rule 10b-5, 17 C.F.R. §§ 240.10b-5.

II.

Enter a Final Judgment ordering Sarna and Nussen to disgorge an amount equal to the funds and benefits that they obtained illegally as a result of the violations alleged herein, plus prejudgment interest.

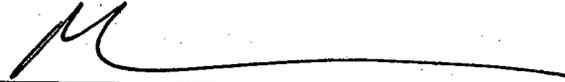
III.

Enter a Final Judgment ordering Sarna and Nussen to pay civil money penalties pursuant to Section 20(d) of the Securities Act, 15 U.S.C. § 77t(d), and Section 21(d)(3) of the Exchange Act, 15 U.S.C. § 78u(d)(3).

IV.

Grant such other and further relief as the Court may deem just and appropriate.

Dated: August 10, 2006
New York, New York



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