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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

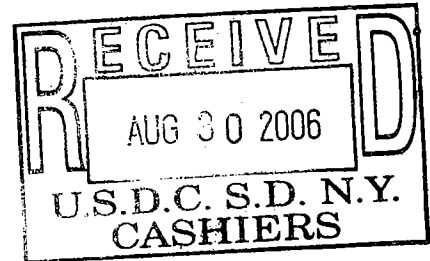
-against-

SONJA ANTICEVIC, DAVID PAJGIN, EUGENE  
PLOTKIN, STANISLAV SHPIGELMAN,  
NICKOLAUS SHUSTER, JUAN C. RENTERIA, JR.,  
HENRY SIEGEL, ELVIS SANTANA, MONIKA  
VUJOVIC, MIKHAIL PLOTKIN, PERICA  
LOPANDIC, BRUNO VERINAC, ZORAN SORMAZ,  
ILIJA BORAC, ANTUN DILBER, ANTO KRSIC,  
and JASON C. SMITH,

Defendants.

05 Civ. 6991 (KMW)

FOURTH AMENDED  
COMPLAINT



Plaintiff Securities and Exchange Commission (the "Commission") alleges the following against Defendants Sonja Anticevic ("Anticevic"), David Pajcin ("Pajcin"), Eugene Plotkin ("Plotkin"), Stanislav (aka "Stan") Shpigelman ("Shpigelman"), Nickolaus Shuster ("Shuster"), Juan C. Renteria, Jr. ("Renteria"), Henry Siegel ("Siegel"), Elvis Santana ("Santana"), Monika Vujovic ("Vujovic"), Mikhail Plotkin, Perica Lopandic ("Lopandic"), Bruno Verinac ("Verinac"), Zoran Sormaz ("Sormaz"), Ilija Borac ("Borac"), Antun Dilber ("Dilber"), Anto Krsic ("Krsic"), and Jason C. Smith ("Smith") (collectively, the "Defendants"):

## SUMMARY

1. This case involves a widespread and brazen international scheme of serial insider trading orchestrated by Plotkin, a former Associate in the Fixed Income Research division at Goldman Sachs Group (“Goldman Sachs”), and Pajcin, a former analyst at Goldman Sachs, resulting in at least \$6.8 million of illicit gains. Beginning in late 2004, Pajcin and Plotkin engaged in a conspiracy with several individuals to surreptitiously obtain confidential non-public information from a variety of sources, including investment banks, financial publications, and a federal grand jury. Pursuant to this conspiracy, Pajcin and Plotkin developed, organized, and participated in, at least three separate insider-trading schemes (collectively, the “Insider Trading Schemes”). Pajcin and Plotkin agreed to share all proceeds from their fraudulent enterprises.

2. In the first scheme, Pajcin and Plotkin recruited Shpigelman, a Mergers and Acquisitions Analyst at Merrill Lynch & Co., Inc. (“Merrill Lynch”), to provide them with information about pending mergers and acquisitions deals on which Merrill Lynch was working, prior to the time such information became public (the “Merrill Lynch Scheme”). As part of this scheme, Plotkin and Pajcin promised to compensate Shpigelman with a percentage of the profits they made from trades entered into on the basis of the insider information Shpigelman provided. Pursuant to this scheme, from late 2004 to the summer of 2005 (the “Relevant Period”), Shpigelman provided Pajcin and Plotkin with non-public information concerning at least six mergers or acquisitions that Merrill Lynch was working on prior to the time the deals became public, including mergers or acquisitions involving Reebok International Ltd. (“Reebok”), Eon Labs, Inc. (“Eon Labs”), Cinergy Corp. (“Cinergy”), Celgene Corp. (“Celgene”), The Gillette Company (“Gillette”), and LabOne, Inc. (“LabOne”).

3. In the second scheme, Plotkin and Pajcin recruited two individuals, first Shuster, and later Renteria, to obtain employment at Quad/Graphics, Inc. (“Quad”), one of the four printing plants that print BusinessWeek magazine, for the sole purpose of stealing copies of the magazine before it was distributed to the public (the “BusinessWeek Scheme”). Pursuant to this scheme, Shuster and Renteria were hired at Quad, repeatedly obtained copies of the upcoming edition of BusinessWeek, and then called Pajcin and Plotkin and read them key portions of the “Inside Wall Street” column – a widely-read column that generally moves the price of the securities of companies mentioned in it – prior to the time the column was made available to the public. Collectively, Shuster and Renteria provided Pajcin and Plotkin with material non-public information concerning at least twenty companies that were featured in the “Inside Wall Street” column.

4. In the third scheme, one of Pajcin’s longstanding friends, Smith, told Pajcin and Plotkin that he was sitting on a federal grand jury in the District of New Jersey that was convened to investigate, among other things, potential accounting fraud at Bristol-Myers Squibb Co. (“Bristol-Myers”). Smith then leaked information about the grand jury proceedings to Pajcin and Plotkin in order to enable them to trade on non-public information (the “Grand Jury Scheme”). As part of this scheme, Smith communicated to Pajcin and Plotkin that it appeared as if one of Bristol-Myers’ then-current high-ranking executives would be indicted, and based on that information, various of the Defendants purchased put options in Bristol-Myers or shorted Bristol-Myers stock in an attempt to profit on the negative information. Later, a day before the announcement of a deferred prosecution agreement with Bristol-Myers in which the high-ranking executive was not indicted, Smith told Pajcin that the grand jury did not return an

