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Attorneys for Plaintiff

SECURITIES AND EXCHANGE COMMISSION

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

SECURITIES AND EXCHANGE
COMMISSION,

CV.

CV '07 - 957 ST

Plaintiff,

v.

COMPLAINT

SI CHAN WOOH,

Defendant.

Plaintiff Securities and Exchange Commission (the "Commission") alleges:

SUMMARY OF THE ACTION

1. This matter involves violations of the Foreign Corrupt Practices Act of 1977 ("FCPA") by defendant Si Chan WooH, a former executive at Schnitzer Steel Industries

COMPLAINT

23. By reason of the foregoing, Wooh aided and abetted Schnitzer's failure to make and keep books, records and accounts which, in reasonable detail, accurately and fairly reflected its transactions and dispositions of its assets, in violation of Section 13(b)(2)(A) of the Exchange Act [15 U.S.C. § 78m(b)(2)(A)].

PRAYER FOR RELIEF

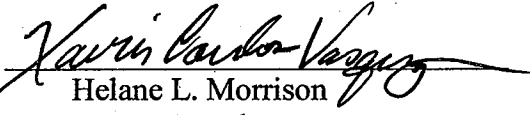
WHEREFORE, the Commission respectfully requests that the Court:

1. Permanently enjoin Wooh and his agents, servants, employees, attorneys, and all persons in active concert or participation with them who receive actual notice of the judgment by personal service or otherwise from directly or indirectly violating, or aiding and abetting violations of, Sections 30A and 13(b)(2)(A) of the Exchange Act;
2. Order Wooh to disgorge all wrongfully obtained benefits, plus prejudgment interest;
3. Order Wooh to pay civil penalties under Sections 21(d) and 32(d) of the Exchange Act [15 U.S.C. §§ 78u(d) and 78ff];
4. Retain jurisdiction of this action in accordance with the principles of equity and the Federal Rules of Civil Procedure in order to implement and carry out the terms of all orders and decrees that may be entered, or to entertain any suitable application or motion for additional relief within the jurisdiction of this Court; and

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

Dated: June 27, 2007

Respectfully submitted,

By: 
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Tracy L. Davis
Xavier Carlos Vasquez

Attorneys for Plaintiff
SECURITIES AND EXCHANGE
COMMISSION