LLM Bank New York Branch ("LLM NY") is a wholesale branch of LLM Bank Ltd. ("LLM"), a commercial bank located in mainland China. LLM NY is filing this Suspicious Activity Report ("SAR") (Internal SAR Reference Number 2025-0002) to report 7 transaction(s) totaling $7,613,703.29 and sent between 09/02/2024 and 09/23/2024.

The transactions in question occurred as follows: On 9/2/2024, RDF Plumbing received a wire of $254,742.43 from US processing in the US. On the same day, RDF Plumbing received another wire of $254,742.43 from Cos Cob Fishery in the US. Also on 9/2/2024, RDF Plumbing received a wire of $254,742.43 from HK Industries in Hong Kong. Later that day, RDF Plumbing received an ACH credit of $179,000.00 from JD Import and Export in the UK. On 9/14/2024, RDF Plumbing initiated an internal transfer of $2,286,712.80 to a related account ACC-3. The next day, on 9/15/2024, ACC-3 sent a wire of $2,400,000.00 to IRS Legal Services in China. Finally, on 9/23/2024, RDF Plumbing received a wire of $1,598,564.00 from Palmetto Translation Services in China. These transactions involved account IDs ACC-2 and ACC-3 and spanned multiple jurisdictions, including the US, Hong Kong, the UK, and China.

RDF Plumbing, with Customer ID C-2, is classified as a Business in the Plumbing Services sector, incorporated in the US. The expected products for this customer include ACH, wire, cash deposit, and internal transfer, with expected geographies limited to the US. However, the transactions reported involve countries outside the expected geography, including Hong Kong, the UK, and China, which raises concerns. There appears to be no legitimate relationship between RDF Plumbing and the counterparties involved in these transactions, particularly those in Hong Kong and China, based on the available KYC information and external research. The customer's line of business as a plumbing service does not provide a reasonable explanation for transactions with entities in these jurisdictions.

These transactions are being reported due to the following:

1. No apparent economic or business purpose for the transactions, especially considering the customer's line of business and expected transaction patterns.

2. Possible shell company or funnel account activity, given the rapid movement of funds and the involvement of entities in high-risk jurisdictions.

3. Unusual transaction patterns, including the receipt of multiple wires on the same day from different entities and the subsequent internal transfer and wire to China.

4. High-risk jurisdiction involvement, including transactions with entities in Hong Kong and China, which are not aligned with the customer's expected business activities.

5. Lack of identifiable relationship between RDF Plumbing and the transaction counterparties, particularly those outside the US.

6. The presence of round dollar amounts in some transactions, which is unusual in the normal course of business for a plumbing service.

This SAR pertains to LLM NY Case No. 2025-0002. For inquiries, please contact Donald J. Orange, Chief Compliance Officer and Chief BSA/AML Officer (646-555-5555 or donaldjorange@llmbank.com) or Alyn Mask, General Counsel (646-666-6666 or alynmask@llmbank.com). All supporting documentation is maintained by the Financial Crime Compliance Department at LLM NY.