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 $7,227,504.80 and sent between 09/02/2024 and 09/23/2024.

Between September 2, 2024, and September 23, 2024, RDF Plumbing (Customer ID: C-2) engaged in seven transactions inconsistent with its stated business operations. On September 2, 2024, RDF Plumbing received an incoming wire of $200,000.00 from US Processing (US) into account ACC-2. On September 7, 2024, account ACC-2 received $179,000.00 via ACH credit from JD Import and Export (UK). A third incoming wire of $552,665.00 from Cos Cob Fishery (US) was credited to ACC-2 on September 9, 2024. On September 10, 2024, HK Industries (Hong Kong) sent $10,563.00 to ACC-2. On September 14, 2024, RDF Plumbing transferred $2,286,712.80 internally from ACC-2 to ACC-3. The following day, ACC-3 sent $2,400,000.00 to IRS Legal Services (Switzerland). On September 23, 2024, Palmetto Translation Services (Switzerland) wired $1,598,564.00 to ACC-2.

RDF Plumbing is a US-based plumbing services business with expected transactional activity limited to US jurisdictions. Its KYC profile specifies anticipated monthly inflows and outflows of approximately $200,000.00. The customer’s account activity far exceeds these thresholds, with no documented rationale for transactions involving Switzerland, Hong Kong, or the UK. Internal due diligence revealed no legitimate business relationships between RDF Plumbing and the foreign counterparties. KYC records lack evidence of international operations or justification for high-value transfers inconsistent with plumbing services.

These transactions are being reported due to the following:

1. No apparent economic or business purpose for receiving funds from entities in high-risk jurisdictions (Switzerland, Hong Kong) unrelated to plumbing services.

2. Suspicious round-dollar transactions (e.g., $200,000.00, $2,400,000.00) inconsistent with typical plumbing service invoicing.

3. Rapid fund movement between accounts (ACC-2 to ACC-3) followed by immediate large outflows to Switzerland.

4. Use of internal transfers potentially obscuring the origin and purpose of funds.

5. Disproportionate transaction volumes ($7.2 million over 21 days) relative to stated business operations.

6. Lack of identifiable relationship between RDF Plumbing and foreign beneficiaries/originators.

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.