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.

The transactions in question occurred as follows: On 09/02/2024, a wire of $200,000.00 was sent from US Processing (US) to RDF Plumbing - ACC2 (US) at LLM NY account ACC-2. On 09/07/2024, JD Import and Export (UK) sent a wire of $179,000.00 to RDF Plumbing - ACC2 (US) at LLM NY account ACC-2. On 09/09/2024, Cos Cob Fishery (US) sent a wire of $552,665.00 to RDF Plumbing - ACC2 (US) at LLM NY account ACC-2. On 09/10/2024, HK Industries (HK) sent a wire of $10,563.00 to RDF Plumbing - ACC2 (US) at LLM NY account ACC-2. On 09/14/2024, RDF Plumbing - ACC2 (US) sent a wire of $2,286,712.80 to RDF Plumbing - ACC3 (US) at LLM NY account ACC-3. On 09/15/2024, IRS Legal Services (CH) received a wire of $2,400,000.00 from RDF Plumbing - ACC3 (US) sent from LLM NY account ACC-3. On 09/23/2024, Palmetto Translation Services (CH) sent a wire of $1,598,564.00 to RDF Plumbing - ACC2 (US) at LLM NY account ACC-2.

RDF Plumbing, with Customer ID C-2, is classified as a Business in the Plumbing Services sector, incorporated/residing 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 involve entities from the UK, Hong Kong, and Switzerland, which do not align with the customer's expected business activities or geographies. There is no apparent legitimate relationship between RDF Plumbing and the counterparties involved in these transactions, including US Processing, JD Import and Export, Cos Cob Fishery, HK Industries, IRS Legal Services, and Palmetto Translation Services. Internal and external research did not identify a reasonable explanation for these transactions, and the round dollar amounts of some transactions are unusual in the normal course of business for a plumbing services company.

These transactions are being reported due to the following:

1. No apparent economic or business purpose for the transactions, given the customer's line of business and expected activities.

2. Possible shell company or funnel account involvement, considering the lack of connection between RDF Plumbing and the transaction counterparties.

3. Unusual transaction patterns, including the receipt of wires from foreign entities and the subsequent transfer of funds to other accounts or entities.

4. High-risk jurisdiction involvement, including transactions with entities from Switzerland and Hong Kong, which are not expected for a US-based plumbing services company.

5. Lack of identifiable relationship between RDF Plumbing and the entities involved in the transactions.

6. Round dollar amounts or mirror wires, which are unusual in the normal course of business for this type of customer.

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.