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 across accounts ACC-2 and ACC-3 at LLM NY. On 09/02/2024, RDF Plumbing received an incoming wire of $200,000.00 from US Processing (US) into ACC-2. On 09/07/2024, a $179,000.00 ACH credit was received from JD Import and Export (UK) into ACC-2. On 09/09/2024, a $552,665.00 wire from Cos Cob Fishery (US) was credited to ACC-2. ACC-2 received an additional $10,563.00 wire from HK Industries (Hong Kong) on 09/10/2024. On 09/14/2024, RDF Plumbing transferred $2,286,712.80 internally from ACC-2 to ACC-3. The following day, ACC-3 sent a $2,400,000.00 wire to IRS Legal Services (Switzerland). On 09/23/2024, ACC-2 received a $1,598,564.00 wire from Palmetto Translation Services (Switzerland).

RDF Plumbing is a US-based plumbing services business with expected transactional activity limited to domestic counterparts. Its KYC profile specifies anticipated geographies as the US and monthly incoming/outgoing volumes of approximately $200,000. No legitimate business rationale or pre-disclosed relationship exists to explain transactions involving Switzerland, Hong Kong, or the UK. The customer’s KYC records lack evidence of international operations, trade partnerships, or corporate affiliations with the counterparties. Key fields such as beneficial ownership documentation and operational footprint beyond the US are incomplete, impairing risk assessment.

These transactions are being reported due to the following:

1. No apparent economic or business purpose for transactions involving high-risk jurisdictions (Switzerland, Hong Kong) inconsistent with a domestic plumbing services business.

2. Unusual transaction patterns, including rapid fund aggregation ($942,228.00 received in ACC-2 within eight days) followed by immediate internal transfer and large outgoing wire to Switzerland.

3. Round-dollar amounts (e.g., $200,000.00, $2,400,000.00) atypical for plumbing services invoicing.

4. Use of a related account (ACC-3) to obscure fund movement, with $2,286,712.80 transferred internally before onward transmission to Switzerland.

5. Lack of identifiable relationship between RDF Plumbing and foreign entities (IRS Legal Services, Palmetto Translation Services, JD Import and Export).

6. Disproportionate transactional volume ($7.2 million) relative to stated business profile and expected monthly activity ($200,000).

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.