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 09/02/2024 and 09/23/2024, RDF Plumbing (Customer ID: C-2) engaged in multiple high-value transactions inconsistent with its stated business operations. On 09/02/2024, RDF Plumbing received $200,000.00 via wire from US Processing (US) into account ACC-2. On 09/07/2024, it received $179,000.00 via wire from JD Import and Export (UK) into ACC-2. A $552,665.00 wire from Cos Cob Fishery (US) was deposited into ACC-2 on 09/09/2024, followed by a $10,563.00 wire from HK Industries (Hong Kong) into ACC-2 on 09/10/2024. On 09/14/2024, RDF Plumbing transferred $2,286,712.80 internally from ACC-2 to ACC-3. The next day, ACC-3 sent $2,400,000.00 to IRS Legal Services (Switzerland). On 09/23/2024, RDF Plumbing received $1,598,564.00 via wire from Palmetto Translation Services (Switzerland) into ACC-2.

RDF Plumbing is a U.S.-incorporated plumbing services business with expected transactional activity limited to U.S.-based counterparties. Its KYC profile indicates anticipated monthly inflows and outflows of approximately $200,000.00, primarily via ACH, wire, cash deposits, and internal transfers. No legitimate business rationale or documented relationship exists between RDF Plumbing and the foreign counterparties in Switzerland, Hong Kong, or the UK. Internal and external investigations revealed no plausible explanation for the high-value transactions, particularly involving jurisdictions outside the customer’s expected geographic scope.

These transactions are being reported due to the following:

1. \*\*No apparent economic or business purpose\*\*: A plumbing services business receiving and transferring millions of dollars from/to entities in unrelated industries and jurisdictions lacks a discernible legitimate rationale.

2. \*\*High-risk jurisdiction involvement\*\*: Transactions with counterparties in Switzerland (IRS Legal Services, Palmetto Translation Services) and Hong Kong (HK Industries) raise concerns given the customer’s lack of documented ties to these regions.

3. \*\*Unusual transaction patterns\*\*: Rapid movement of funds between accounts (e.g., $2.29 million internal transfer followed by a $2.4 million wire to Switzerland) and inconsistent transaction sizes deviate from expected activity for a small plumbing business.

4. \*\*Round dollar amounts or mirror wires\*\*: Multiple transactions (e.g., $200,000.00, $2,400,000.00) involve round-dollar amounts atypical of legitimate business operations.

5. \*\*Lack of identifiable relationship between entities\*\*: No established connection exists between RDF Plumbing and foreign entities in Switzerland, Hong Kong, or the UK, as indicated by KYC and due diligence reviews.

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.