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, US Processing (US) sent a wire of $200,000.00 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. These transactions involved jurisdictions including the US, UK, Hong Kong, and Switzerland.

RDF Plumbing (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 reported involve countries outside the expected geography, including the UK, Hong Kong, and Switzerland, which raises concerns. The customer's line of business does not appear to have a legitimate connection to these international transactions or counterparties. Internal and external research did not identify a reasonable explanation for the customer's activity, particularly the round dollar transactions which are unusual in the normal course of business for a plumbing service.

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 geographies.

2. Possible shell company or funnel account usage, given the involvement of multiple jurisdictions and entities not clearly connected to the customer's business.

3. Unusual transaction patterns, including the receipt of funds from and sending of funds to entities in high-risk jurisdictions or those not expected based on the customer's profile.

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

5. Lack of identifiable relationship between the customer and the transaction counterparties, particularly those in foreign jurisdictions.

6. The presence of round dollar amounts in some transactions, which is unusual for the customer's type of business and may indicate structuring.

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.