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.

RDF Plumbing (Customer ID: C-2) is a business in the Plumbing Services sector, incorporated in the US. The customer's expected products include ACH, Wire, Cash Deposit, and Internal Transfer, with expected geographies limited to the US. However, the transactions involve counterparties from the UK, Hong Kong, and Switzerland, which is outside the expected geographies. There is no apparent connection between RDF Plumbing and these foreign entities based on the available information. The customer's KYC information does not provide a reasonable explanation for these transactions, and the round dollar amounts are unusual in the normal course of business.

These transactions are being reported due to the following:

1. No apparent economic or business purpose, as the customer's line of business does not align with the transactions involving foreign entities.

2. Possible shell company or funnel account, given the involvement of entities from high-risk jurisdictions and the lack of a clear connection to the customer's business.

3. Unusual transaction patterns, including round dollar amounts and rapid movement of funds between accounts.

4. High-risk jurisdiction involvement, including transactions with entities from the UK, Hong Kong, and Switzerland, which are not expected geographies for the customer's business.

5. Lack of identifiable relationship between entities, as there is no apparent connection between RDF Plumbing and the foreign entities involved in the transactions.

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.