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 $763,228.00 and sent between 09/02/2024 and 09/23/2024.

Between September 2, 2024, and September 10, 2024, RDF Plumbing (Customer ID: C-2) received three incoming wires totaling $763,228.00: $254,409.33 from US Processing (US), $254,409.33 from Cos Cob Fishery (US), and $254,409.33 from HK Industries (Hong Kong). On September 10, 2024, the customer received an ACH credit of $179,000.00 from JD Import and Export (UK) into account ACC-2. On September 14, 2024, an internal transfer of $2,286,712.80 was initiated from ACC-2 to related account ACC-3. On September 15, 2024, a wire transfer of $2,400,000.00 was sent from ACC-3 to IRS Legal Services (China). On September 23, 2024, ACC-2 received a wire of $1,598,564.00 from Palmetto Translation Services (China).

RDF Plumbing is a US-based plumbing services business with no documented ties to China, Hong Kong, or the UK. KYC records indicate expected transactional activity limited to US geographies, with projected monthly inflows and outflows of approximately $200,000. The customer’s profile lacks evidence of legitimate relationships with the foreign counterparties involved, including HK Industries, JD Import and Export, IRS Legal Services, or Palmetto Translation Services. KYC data does not explain the purpose of high-value international transactions or the business rationale for interactions with entities in China.

These transactions are being reported due to the following:

1. \*\*No apparent economic or business purpose\*\*: A plumbing services company engaging in multimillion-dollar transactions with entities in China, Hong Kong, and the UK lacks a discernible commercial rationale.

2. \*\*Possible funnel account activity\*\*: Rapid movement of funds through related accounts (ACC-2 to ACC-3), followed by large outgoing transfers to China, suggests layering or funneling.

3. \*\*Unusual transaction patterns\*\*: Round-dollar amounts (e.g., $179,000.00, $2,400,000.00) and near-identical wire amounts ($254,409.33 x3) are inconsistent with typical plumbing services operations.

4. \*\*High-risk jurisdiction involvement\*\*: Transactions linked to China and Hong Kong, jurisdictions associated with elevated AML risks, contradict the customer’s stated US-focused business scope.

5. \*\*Lack of identifiable relationship between entities\*\*: No documented connections exist between RDF Plumbing and foreign counterparties, including IRS Legal Services or Palmetto Translation Services.

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.