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 $7,613,703.29 and sent between 09/02/2024 and 09/23/2024.

The transactions in question involve RDF Plumbing, a customer of LLM NY, with Customer ID: C-2, and Account ID(s): ACC-2, ACC-3. On 09/02/2024, RDF Plumbing received three wires: one for $254,742.43 from US processing in the US, another for $254,742.43 from Cos Cob Fishery in the US, and a third for $254,742.43 from HK Industries in Hong Kong. On the same day, RDF Plumbing also received an ACH credit of $179,000.00 from JD Import and Export in the UK. On 09/14/2024, RDF Plumbing initiated an internal transfer of $2,286,712.80 to a related account ACC-3. The next day, on 09/15/2024, ACC-3 sent a wire of $2,400,000.00 to IRS Legal Services in China. Finally, on 09/23/2024, RDF Plumbing received a wire of $1,598,564.00 from Palmetto Translation Services in China.

RDF Plumbing, with 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 in question involve jurisdictions outside the expected scope, including Hong Kong and China, which raises concerns. Furthermore, the customer's expected monthly activity is $200,000 for both incoming and outgoing transactions, which is significantly lower than the total amount reported in this SAR. Internal and external research did not identify a reasonable explanation for the customer's activity, and the presence of round dollar transactions is 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 activity.

2. Possible shell company or funnel account usage, given the involvement of entities from high-risk jurisdictions and the lack of identifiable relationships between the customer and these entities.

3. Unusual transaction patterns, including the receipt of multiple wires on the same day from different countries and the subsequent transfer of large sums to unrelated parties in China.

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

5. Lack of identifiable relationship between the customer and the counterparties involved in the transactions.

6. The presence of round dollar amounts in some transactions, which is unusual for the customer's normal business activities.

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.