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.

[2]

Between 09/02/2024 and 09/10/2024, RDF Plumbing (Account ID: ACC-2) received three incoming wires: $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 09/10/2024, RDF Plumbing received an ACH credit of $179,000.00 from JD Import and Export (UK) into ACC-2. On 09/14/2024, an internal transfer of $2,286,712.80 was sent from ACC-2 to related account ACC-3. On 09/15/2024, a wire of $2,400,000.00 was sent from ACC-3 to IRS Legal Services (China). On 09/23/2024, RDF Plumbing received an incoming wire of $1,598,564.00 from Palmetto Translation Services (China) into ACC-2. Transactions exhibited identical amounts from multiple originators, rapid movement of funds between accounts, and large round-dollar transfers inconsistent with typical plumbing business activity.

[3]

Customer Name: RDF Plumbing (Customer ID: C-2), a US-incorporated plumbing services business. Expected transactional activity per KYC includes ACH, wire transfers, cash deposits, and internal transfers, with geographies limited to the US. No legitimate business relationships or documented rationale were identified between RDF Plumbing and the foreign counterparties (HK Industries, JD Import and Export, IRS Legal Services, Palmetto Translation Services). KYC records lack evidence of commercial ties to China, Hong Kong, or the UK. Missing KYC fields include beneficial ownership documentation and a detailed explanation of international transaction purposes.

[4]

These transactions are being reported due to the following:

1. No apparent economic or business purpose for receiving funds from entities in high-risk jurisdictions (China, Hong Kong) unrelated to plumbing services.

2. Suspicious round-dollar amounts (e.g., $179,000.00, $2,400,000.00) inconsistent with typical trade transactions.

3. Rapid fund movement through internal transfers followed by large outgoing wires to China, indicative of potential layering.

4. Use of seemingly unrelated third-party entities (fishery, translation services, processing firms) as counterparties without documented relationships.

5. Transactions involving high-risk jurisdictions (China, Hong Kong) exceeding expected geographic scope per KYC.

[5]

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.