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.

On 9/2/2024, RDF Plumbing received a wire of $254,742.43 from US processing in the US.

On 9/2/2024, RDF Plumbing received a wire of $254,742.43 from Cos Cob Fishery in the US.

On 9/2/2024, RDF Plumbing received a wire of $254,742.43 from HK Industries in Hong Kong.

On 9/2/2024, RDF Plumbing received an ACH credit of $179,000.00 from JD Import and Export in the UK.

On 9/14/2024, RDF Plumbing initiated an internal transfer of $2,286,712.80 to a related account ACC-3.

On 9/15/2024, ACC-3 sent a wire of $2,400,000.00 to IRS Legal Services in China.

On 9/23/2024, RDF Plumbing received a wire of $1,598,564.00 from Palmetto Translation Services in China.

RDF Plumbing (Customer ID: C-2) is classified as a Business in the Plumbing Services sector, incorporated/residing in the US. Expected products: ACH; Wire; Cash Deposit; Internal Transfer. Expected geographies: US. Based on internal KYC data, RDF Plumbing has no legitimate relationship with counterparties in China or Hong Kong. External research also found no connection between RDF Plumbing and the originators or beneficiaries of the transactions, including US processing, Cos Cob Fishery, HK Industries, JD Import and Export, IRS Legal Services, and Palmetto Translation Services.

These transactions are being reported due to the following:

1. No apparent economic or business purpose for the transactions, as RDF Plumbing is a plumbing service with no link to China or Hong Kong.

2. Possible shell company or funnel account, as the transactions involve multiple wires and ACH credits from unrelated companies.

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

4. High-risk jurisdiction involvement, as some transactions involve China and Hong Kong.

5. Lack of identifiable relationship between entities, as RDF Plumbing has no legitimate connection to the originators or beneficiaries of 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.