

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 2024-1235) to report seven (7) transactions totaling \$7,227,504.80 and sent between 9/2/2024 and 9/15/2024.

Between 9/2/2024 and 9/13/2024, RDF Plumbing (United States) received the five (5) wire transfers totaling \$2,540,792.00 to account ACC-2 ("the Receiving Account") at LLM NY:

Transaction 1: \$200,000.00 from US Processing (United States) on 9/2/2024  
Transaction 2: \$179,000.00 from JD Import and Export (United Kingdom) on 9/7/2024  
Transaction 3: \$552,665.00 from Cos Cob Fishery (United States) on 9/9/2024  
Transaction 4: \$10,563.00 from HK Industries (Hong Kong) on 9/10/2024  
Transaction 5: \$1,598,564.00 from Palmetto Translation Services (Switzerland) on 9/13/2024

On 9/14/2024, RDF Plumbing transferred \$2,286,712.8 from the Receiving Account to account ACC-3 ("the Sending Account") at LLM and subsequently transferred \$2,400,000.00 from the Sending Account to IRS Legal Services (Switzerland) on 9/15/2024.

LLM NY KYC information identifies RDF Plumbing as a Plumbing Services company and external research was unable to conclusively identify a line of business for US Processing, JD Import and Export, Cos Cob Fishery, HK Industries, Palmetto Transaction Services, or IRS Legal Services.

This transaction is being reported due to the following: (1) the apparent use of funnel account, (2) the involvement of multiple possible shell companies; and (3) transactions with no apparent economic or business purpose.

This SAR pertains to LLM NY Case No. 2024-1235. For inquiries, please contact Donald J. Orange, Chief Compliance Officer and Chief BSA/AML Officer (646-555-5555 or [donalddjorange@llmbank.com](mailto:donalddjorange@llmbank.com)) or Alyn Mask, General Counsel (646-666-6666 or [alynmask@llmbank.com](mailto:alynmask@llmbank.com)). All supporting documentation is maintained by the Financial Crime Compliance Department at LLM NY.