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 6 transactions totaling $5,628,940.80 and sent between 09/02/2024 and 09/15/2024.

The suspicious transactions include three wires totaling $763,228 received between 9/2/2024 and 9/10/2024, with originators US Processing (US), Cos Cob Fishery (US), and HK Industries (Hong Kong), and an ACH credit from JD Import and Export (UK) for $179,000.00. An internal transfer to a related account (ACC-3) for $2,286,712.80 occurred on 9/14/2024, followed by a wire from ACC-3 to IRS Legal Services (China) for $2,400,000.00 on 9/15/2024. A wire from Palmetto Translation Services (China) for $1,598,564.00 was received on 9/23/2024. These transactions deviate from the customer's expected monthly activity and lack a clear economic purpose.

The customer, RDF Plumbing, is a plumbing service with no connection to China or Hong Kong, as per KYC information. The customer's beneficiaries and originators of transactions should be located only in the US. RDF Plumbing is expected to receive $200,000 monthly, with expected outgoing activity also being $200,000. External research indicates that the lines of business of companies involved in the transfers, such as US Processing and Cos Cob Fishery, are domestic in nature and do not typically engage in international transactions.

This transaction is being reported due to the following:

1. The originators of the incoming activity and the beneficiary of the outgoing wire have no apparent connection to the customer.

2. There is no apparent lawful economic purpose for the excessive number of originators and subsequent outgoing wire.

3. Shortly after receiving wires and ACH, the customer initiated a wire transfer to an unrelated company in China with which the customer has no apparent connection, and the customer then received a wire from China with which the customer has no apparent connection.

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.