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 2025-0001) to report 6 transactions totaling $5,628,940.80 and sent between 09/02/2024 and 09/15/2024.

On 9/2/2024 to 9/23/2024, the customer received three wires totaling $763,228 from US Processing, Cos Cob Fishery, and HK Industries, and one ACH credit from JD Import and Export for $179,000. The customer then made an internal transfer to a related account, ACC-3, for $2,286,712.80 on 9/14/2024, and subsequently sent a wire from ACC-3 to IRS Legal Services in China for $2,400,000. On 9/23/2024, the customer received a wire from Palmetto Translation Services in China for $1,598,564. These transactions were deemed suspicious due to the originators and beneficiaries having no apparent connection to the customer, and the excessive number of originators and subsequent outgoing wire with no apparent lawful economic purpose. The transactions were unusual in the normal course of business, with round dollar amounts, and the customer initiated a wire transfer to an unrelated company in China shortly after receiving the wires and ACH.

The customer is a plumbing service with no link to China nor Hong Kong, and the customer’s expected monthly receipts and outgoing activity are $200,000, with beneficiaries and originators of transactions expected to be located only in the US. The customer received wires from US Processing, Cos Cob Fishery, HK Industries, and Palmetto Translation Services, and an ACH credit from JD Import and Export, with no apparent connection to these companies. The customer also initiated a wire transfer to IRS Legal Services in China, which has no apparent connection to the customer's plumbing business.

This transaction is being reported due to the following:

(1) the customer's incoming activity from multiple originators, including those with no apparent connection to the customer, with the customer receiving three wires totaling $763,228 from US Processing, Cos Cob Fishery, and HK Industries, and one ACH credit from JD Import and Export for $179,000,

(2) the customer's outgoing wire transfer to an unrelated company, IRS Legal Services located in China, with which the customer has no apparent connection,

(3) the customer's subsequent receipt of a wire from Palmetto Translation Services, also located in China, with which the customer has no apparent connection,

(4) the lack of an apparent lawful economic purpose for the excessive number of originators and subsequent outgoing wire,

(5) the unusual round dollar transactions which are not consistent with the customer's normal course of business,

(6) the significant disparity between the customer's expected monthly activity of $200,000 and the actual incoming and outgoing transactions,

(7) the unexplained and unusual rapid movement of funds which raises suspicions of potential suspicious activity.

This SAR pertains to LLM NY Case No. 2025-0001. 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.