\*\*Suspicious Activity Report (SAR)\*\*

\*\*Internal SAR Reference Number: 2025-0002\*\*

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\*\*[1] STANDARD INTRODUCTORY STATEMENT\*\*

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 transaction(s) totaling $5,628,940.80 and sent between 09/02/2024 and 09/15/2024.

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\*\*[2] TRANSACTION SUMMARY\*\*

On 09/02/2024, RDF Plumbing received a $200,000.00 incoming wire from US Processing (US) to account ACC-2.

On 09/07/2024, RDF Plumbing received a $179,000.00 incoming wire from JD Import and Export (UK) to account ACC-2.

On 09/09/2024, RDF Plumbing received a $552,665.00 incoming wire from Cos Cob Fishery (US) to account ACC-2.

On 09/10/2024, RDF Plumbing received a $10,563.00 incoming wire from HK Industries (Hong Kong) to account ACC-2.

On 09/14/2024, RDF Plumbing initiated an internal transfer of $2,286,712.80 from account ACC-2 to account ACC-3.

On 09/15/2024, RDF Plumbing sent a $2,400,000.00 outgoing wire from account ACC-3 to IRS Legal Services (China).

Transactions involved jurisdictions in the US, UK, Hong Kong, and China. Patterns include round-dollar amounts (e.g., $200,000.00, $2,400,000.00), rapid movement of funds between accounts, and a high-value transfer to an entity in China inconsistent with stated business operations.

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\*\*[3] CUSTOMER PROFILE (KYC) AND RELATIONSHIP ANALYSIS\*\*

\*\*Legal Name:\*\* RDF Plumbing (Customer ID: C-2)

\*\*Line of Business:\*\* Plumbing Services

\*\*Incorporation/Residency:\*\* United States

\*\*Account IDs:\*\* ACC-2, ACC-3

\*\*Expected Activity:\*\* Domestic transactions (ACH, wire, cash deposits) within the US.

KYC records indicate RDF Plumbing operates in the US plumbing sector with no declared ties to international jurisdictions. No legitimate business relationships were identified with counterparties JD Import and Export (UK), HK Industries (Hong Kong), or IRS Legal Services (China). Missing KYC fields include beneficial ownership details and a complete explanation of international transaction purposes.

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\*\*[4] SUSPICIOUS ACTIVITY REASONS\*\*

These transactions are being reported due to the following:

1. \*\*No Apparent Economic or Business Purpose\*\*: Transactions involving international entities (UK, Hong Kong, China) are inconsistent with a US-based plumbing business.

2. \*\*High-Risk Jurisdiction Involvement\*\*: Transfers to IRS Legal Services (China) and HK Industries (Hong Kong) raise jurisdictional risk concerns.

3. \*\*Lack of Identifiable Relationship\*\*: No documented ties between RDF Plumbing and foreign counterparties.

4. \*\*Unusual Transaction Patterns\*\*: Rapid fund aggregation ($941,228.00 within 8 days) followed by internal transfer and large outgoing wire.

5. \*\*Round-Dollar Amounts\*\*: Multiple transactions (e.g., $200,000.00, $2,400,000.00) suggest artificial structuring.

6. \*\*Possible Funnel Activity\*\*: Funds consolidated into ACC-3 and transferred internationally without justification.

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\*\*[5] CLOSING STATEMENT\*\*

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.

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\*End of SAR Narrative\*