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.

Between 09/02/2024 and 09/15/2024, RDF Plumbing (Customer ID: C-2) engaged in six transactions through accounts ACC-2 and ACC-3 at LLM NY. On 09/02/2024, RDF Plumbing received $200,000.00 via wire from US Processing (US) into ACC-2. On 09/07/2024, a $179,000.00 wire from JD Import and Export (UK) was credited to ACC-2. On 09/09/2024, ACC-2 received $552,665.00 from Cos Cob Fishery (US). On 09/10/2024, HK Industries (HK) sent $10,563.00 to ACC-2. On 09/14/2024, RDF Plumbing transferred $2,286,712.80 internally from ACC-2 to ACC-3. On 09/15/2024, ACC-3 sent $2,400,000.00 via wire to IRS Legal Services (CH).

RDF Plumbing is a US-based plumbing services business with expected transactional activity limited to US geographies. KYC records indicate anticipated monthly inflows and outflows of approximately $200,000. The customer’s profile lacks connections to jurisdictions outside the US, including the UK, Hong Kong, and China. Key KYC fields, including beneficial ownership details and business operational footprint, remain incomplete, hindering a comprehensive risk assessment. No legitimate business rationale was identified for transactions involving foreign entities or the high-value transfer to a Swiss legal services provider.

These transactions are being reported due to the following:

1. \*\*No apparent economic or business purpose\*\* for receiving funds from unrelated foreign entities (UK, Hong Kong) or transferring $2.4 million to a Swiss legal services provider.

2. \*\*Unusual transaction patterns\*\*, including rapid movement of funds between accounts and inconsistent activity volume (total inflows: $941,228.00; total outflows: $4,686,712.80).

3. \*\*High-risk jurisdiction involvement\*\* via transactions linked to Hong Kong and Switzerland.

4. \*\*Lack of identifiable relationship\*\* between RDF Plumbing and foreign counterparties (JD Import and Export, HK Industries, IRS Legal Services).

5. \*\*Round dollar amounts\*\* ($200,000.00, $2,400,000.00) inconsistent with typical plumbing services 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.