\*LLM Bank New York Branch ("LLM NY") Suspicious Activity Report\*\*

\*\*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.

\*\*2. Transaction Summary\*\*

On 09/02/2024, RDF Plumbing received an incoming wire of $200,000.00 from US Processing (US) into account ACC-2. On 09/07/2024, a $179,000.00 incoming wire from JD Import and Export (UK) was credited to ACC-2. On 09/09/2024, Cos Cob Fishery (US) sent $552,665.00 to ACC-2. On 09/10/2024, HK Industries (Hong Kong) transferred $10,563.00 into ACC-2. On 09/14/2024, RDF Plumbing initiated an internal transfer of $2,286,712.80 from ACC-2 to ACC-3. On 09/15/2024, a $2,400,000.00 outgoing wire was sent from ACC-3 to IRS Legal Services (China).

Transactions involved multiple jurisdictions (US, UK, Hong Kong, China) and included round-dollar amounts (e.g., $200,000.00, $2,400,000.00). Funds were rapidly consolidated between accounts and transferred internationally within a 13-day period.

\*\*3. Customer Profile (KYC) and Relationship Analysis\*\*

Customer Name: RDF Plumbing (Customer ID: C-2)

Incorporation/Residency: US

Line of Business: Plumbing Services

Account IDs: ACC-2, ACC-3

KYC records indicate RDF Plumbing is a US-based plumbing services business with expected transactional geographies limited to the US. The customer’s profile does not establish legitimate ties to the UK, Hong Kong, or China. No business rationale was identified for receiving funds from entities in unrelated industries (e.g., fisheries, import/export) or transferring funds to a legal services firm in China. Key KYC fields, including beneficial ownership details and source of wealth, are incomplete, hindering risk assessment.

\*\*4. Suspicious Activity Reasons\*\*

These transactions are being reported due to the following:

1. \*\*No Apparent Economic or Business Purpose\*\*: Incoming funds from unrelated entities (e.g., fisheries, UK import/export) and outgoing transfers to a Chinese legal services firm lack a discernible business rationale for a plumbing services company.

2. \*\*High-Risk Jurisdiction Involvement\*\*: Transactions linked to Hong Kong and China, jurisdictions associated with elevated money laundering risks.

3. \*\*Unusual Transaction Patterns\*\*: Rapid movement of funds between accounts and jurisdictions within a short timeframe, inconsistent with stated business operations.

4. \*\*Round-Dollar Amounts\*\*: Multiple transactions (e.g., $200,000.00, $2,400,000.00) involving exact figures atypical for routine commercial activity.

5. \*\*Lack of Identifiable Relationship\*\*: No documented connection between RDF Plumbing and counterparties in foreign jurisdictions.

\*\*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.