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.

The transactions in question occurred as follows: On 09/02/2024, US Processing (US) sent a wire of $200,000.00 to RDF Plumbing - ACC2 (US) at LLM NY account ACC-2. On 09/07/2024, JD Import and Export (UK) sent a wire of $179,000.00 to RDF Plumbing - ACC2 (US) at LLM NY account ACC-2. On 09/09/2024, Cos Cob Fishery (US) sent a wire of $552,665.00 to RDF Plumbing - ACC2 (US) at LLM NY account ACC-2. On 09/10/2024, HK Industries (HK) sent a wire of $10,563.00 to RDF Plumbing - ACC2 (US) at LLM NY account ACC-2. On 09/14/2024, RDF Plumbing - ACC2 (US) sent a wire of $2,286,712.80 to RDF Plumbing - ACC3 (US) at LLM NY account ACC-3. On 09/15/2024, IRS Legal Services (CH) received a wire of $2,400,000.00 from RDF Plumbing - ACC3 (US) sent from LLM NY account ACC-3.

RDF Plumbing (Customer ID: C-2) is classified as a Business in the Plumbing Services sector, incorporated/residing in the US. Expected products include ACH, Wire, Cash Deposit, and Internal Transfer, with expected geographies limited to the US. However, the transactions involve parties from the UK, Hong Kong, and China, which is unusual given the customer's line of business and expected geographies. The customer's KYC information does not indicate any legitimate connection to these countries or entities.

These transactions are being reported due to the following:

1. No apparent economic or business purpose, as the transactions involve parties and jurisdictions not aligned with the customer's expected business activities.

2. Possible shell company or funnel account, given the involvement of entities from high-risk jurisdictions and the lack of a clear business relationship between the customer and these entities.

3. Unusual transaction patterns, including the receipt of wires from multiple foreign entities and the subsequent transfer of funds to another account held by the customer, followed by a wire to a beneficiary in China.

4. High-risk jurisdiction involvement, including transactions with entities in the UK, Hong Kong, and China, which is not consistent with the customer's expected business activities.

5. Lack of identifiable relationship between entities, as there is no clear business purpose or connection between the customer and the originators and beneficiaries of the transactions.

6. Round dollar amounts or mirror wires, as some transactions involve round dollar amounts, which is unusual in the normal course of business for a plumbing services company.

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.