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 are 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. The customer’s line of business is plumbing services, and the place of incorporation is the US. The expected products for this customer include ACH, wire, cash deposit, and internal transfer, with expected geographies limited to the US. However, the transactions reported involve counterparties from the UK, Hong Kong, and China, which are not aligned with the customer’s expected business activities or geographies. No reasonable explanation for these transactions has been found based on the customer’s profile and expected business activities.

These transactions are being reported due to the following:

1. No apparent economic or business purpose, as the transactions involve counterparties from countries not aligned with the customer’s expected business activities or geographies.

2. Possible shell company or funnel account, as the customer received wires from entities in the UK and Hong Kong, which are not expected based on the customer’s profile.

3. Unusual transaction patterns, including a large internal transfer and subsequent wire to a beneficiary in China, which is not consistent with the customer’s expected business activities.

4. High-risk jurisdiction involvement, as the customer sent a wire to a beneficiary in China, which is considered a high-risk jurisdiction.

5. Lack of identifiable relationship between entities, as there is no apparent connection between the customer and the counterparties involved in the transactions.

6. Round dollar amounts or mirror wires, as one of the transactions involved a round dollar amount, 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.