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.

On 09/02/2024, a wire of $200,000.00 was sent from US Processing (US) 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 are ACH, Wire, Cash Deposit, and Internal Transfer, with expected geographies limited to the US. There is no reasonable explanation for the customer's activity, and round dollar transactions are unusual in the normal course of business.

These transactions are being reported due to the following:

1. No apparent economic or business purpose for the wires from JD Import and Export (UK) and HK Industries (HK) to RDF Plumbing.

2. Possible shell company or funnel account usage, given the rapid movement of funds through RDF Plumbing's accounts.

3. Unusual transaction patterns, including round dollar amounts and mirror transactions, which do not align with the expected business activity of a plumbing service.

4. High-risk jurisdiction involvement, including transactions with entities in the UK, Hong Kong, and China, which are not expected based on the customer's KYC information.

5. Lack of identifiable relationship between RDF Plumbing and the originators and beneficiaries of the transactions, including US Processing, Cos Cob Fishery, JD Import and Export, HK Industries, and IRS Legal Services.

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.