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 2025-0001) to report 13 transaction(s) totaling $213,000.00 and sent between 09/02/2024 and 09/14/2024.

Between September 2, 2024, and September 13, 2024, John Diamond (Customer ID: C-1) initiated twelve consecutive outgoing wire transfers of $9,000.00 each from LLM NY account ACC-1 to himself, totaling $108,000.00. All transfers originated and terminated within the United States. On September 14, 2024, a $105,000.00 outgoing wire was sent from ACC-1 to ACME Investment Management in the Cayman Islands. Transactions exhibited round-dollar amounts, rapid sequential execution, and a final aggregated transfer to a high-risk jurisdiction.

John Diamond, an individual residing at 277 Park Ave., New York, NY, 12345 (DOB: 04/20/1988; SSN: 123-45-6789), is categorized under the manufacturing sector with expected domestic activity. KYC records indicate no declared business nexus with the Cayman Islands or ACME Investment Management. Internal due diligence identified no legitimate rationale for self-directed transfers or the offshore transaction. Critical KYC fields related to beneficial ownership verification for ACME Investment Management remain incomplete, impeding risk assessment.

These transactions are being reported due to the following:

1. No apparent economic or business purpose for repeated self-directed transfers followed by an aggregated offshore transaction.

2. Unusual transaction patterns, including twelve consecutive $9,000.00 transfers below regulatory reporting thresholds.

3. High-risk jurisdiction involvement through the final transfer to the Cayman Islands.

4. Lack of identifiable relationship between the customer and ACME Investment Management.

5. Structured round-dollar amounts inconsistent with declared manufacturing business operations.

This SAR pertains to LLM NY Case No. 2025-0001. 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.