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.

The transactions under review occurred between 09/02/2024 and 09/14/2024. On 09/02/2024, a wire of $9,000.00 was sent from John Diamond (US) to John Diamond (US) at LLM NY account ACC-1. On 09/03/2024, a wire of $9,000.00 was sent from John Diamond (US) to John Diamond (US) at LLM NY account ACC-1. On 09/04/2024, a wire of $9,000.00 was sent from John Diamond (US) to John Diamond (US) at LLM NY account ACC-1. On 09/05/2024, a wire of $9,000.00 was sent from John Diamond (US) to John Diamond (US) at LLM NY account ACC-1. On 09/06/2024, a wire of $9,000.00 was sent from John Diamond (US) to John Diamond (US) at LLM NY account ACC-1. On 09/07/2024, a wire of $9,000.00 was sent from John Diamond (US) to John Diamond (US) at LLM NY account ACC-1. On 09/08/2024, a wire of $9,000.00 was sent from John Diamond (US) to John Diamond (US) at LLM NY account ACC-1. On 09/09/2024, a wire of $9,000.00 was sent from John Diamond (US) to John Diamond (US) at LLM NY account ACC-1. On 09/10/2024, a wire of $9,000.00 was sent from John Diamond (US) to John Diamond (US) at LLM NY account ACC-1. On 09/11/2024, a wire of $9,000.00 was sent from John Diamond (US) to John Diamond (US) at LLM NY account ACC-1. On 09/12/2024, a wire of $9,000.00 was sent from John Diamond (US) to John Diamond (US) at LLM NY account ACC-1. On 09/13/2024, a wire of $9,000.00 was sent from John Diamond (US) to John Diamond (US) at LLM NY account ACC-1. On 09/14/2024, ACME Investment Management (KY) received a wire of $105,000.00 from John Diamond (US) sent from LLM NY account ACC-1. The transactions involved incoming and outgoing wires between the US and the Cayman Islands, with the majority being internal transfers within the US. The round dollar amounts and rapid movement of funds are unusual patterns.

John Diamond (Customer ID: C-1) is classified as an Individual in the Manufacturing sector, incorporated/residing in the US. The customer's expected products are ACH and Wire, with expected geographies limited to the US. The customer's Date of Birth is 1988-04-20, SSN is 123-45-6789, and address is 277 Park Ave., New York, NY, 12345. There is no apparent legitimate relationship between John Diamond and ACME Investment Management or the Cayman Islands based on internal and external research. The customer's line of business does not suggest a need for transactions with entities in the Cayman Islands.

These transactions are being reported due to the following:

1. No apparent economic or business purpose for the transactions, particularly the wire to ACME Investment Management in the Cayman Islands.

2. Possible shell company or funnel account activity, given the round dollar amounts and rapid movement of funds.

3. Unusual transaction patterns, including the consistent $9,000.00 wire transfers and the subsequent large wire transfer to ACME Investment Management.

4. High-risk jurisdiction involvement, specifically the Cayman Islands, which is known for its secrecy and potential money laundering risks.

5. Lack of identifiable relationship between John Diamond and ACME Investment Management or the Cayman Islands.

6. Cash structuring, as evidenced by the multiple $9,000.00 wire transfers, which may be an attempt to avoid reporting thresholds.

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.