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.

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.

John Diamond (Customer ID: C-1) is classified as an individual in the manufacturing sector, incorporated/residing in the US. The customer's line of business is manufacturing. The customer's place of incorporation or residency is the US. The customer's date of birth is 1988-04-20. The customer's SSN is 123-45-6789. The customer's address is 277 Park Ave., New York, NY, 12345. According to internal KYC data, the customer's expected products are ACH and wire, and the expected geographies are the US. An investigation of internal and external sources did not identify a reasonable explanation for the customer's activity, and there appears to be no legitimate relationship between the customer and the originator or beneficiary of the transactions.

These transactions are being reported due to the following:

1. No apparent economic or business purpose for the customer's activity.

2. Possible shell company or funnel account usage, as indicated by the transactions with ACME Investment Management (KY).

3. Unusual transaction patterns, including the receipt of 12 consecutive wires for $9,000.00 each and the subsequent wire transfer to ACME Investment Management (KY) for $105,000.00.

4. High-risk jurisdiction involvement, as the customer sent a wire to ACME Investment Management (KY), which may be considered a high-risk jurisdiction.

5. Lack of identifiable relationship between the customer and ACME Investment Management (KY).

6. Round dollar amounts and mirror transactions, as the customer received and sent wires for round dollar amounts, which is unusual in the normal course of business.

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.