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.

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\*\*2. TRANSACTION SUMMARY\*\*

Between September 2, 2024, and September 13, 2024, John Diamond (Customer ID: C-1) made 12 consecutive daily cash deposits of $9,000.00 each into account ACC-1, totaling $108,000.00. On September 14, 2024, a $105,000.00 outgoing wire transfer was initiated from ACC-1 to ACME Investment Management, a beneficiary entity located in the Cayman Islands.

The cash deposits were structured in round-dollar amounts below the $10,000.00 regulatory reporting threshold. The subsequent wire transfer to the Cayman Islands occurred immediately after the final deposit, resulting in rapid movement of funds.

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\*\*3. CUSTOMER PROFILE (KYC) AND RELATIONSHIP ANALYSIS\*\*

\*\*Legal Name:\*\* John Diamond (Customer ID: C-1)

\*\*Line of Business:\*\* Manufacturing (individual proprietor)

\*\*Residency:\*\* United States

John Diamond’s KYC profile indicates no declared nexus with the Cayman Islands or ACME Investment Management. Internal and external research revealed no legitimate business relationship between the customer and the beneficiary. The customer’s stated occupation in manufacturing is inconsistent with cash-intensive activity, and no source of funds was provided to justify the deposits.

\*\*KYC Deficiencies:\*\*

- No documented explanation for the source of cash deposits.

- No declared ties to high-risk jurisdictions or investment entities.

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\*\*4. SUSPICIOUS ACTIVITY REASONS\*\*

These transactions are being reported due to the following:

1. \*\*Structuring of Cash Deposits:\*\* Twelve consecutive $9,000.00 cash deposits, just below the $10,000.00 reporting threshold, suggest intentional avoidance of regulatory scrutiny.

2. \*\*No Apparent Economic Purpose:\*\* The customer’s manufacturing business does not justify frequent large cash deposits or sudden high-value transfers to an offshore entity.

3. \*\*High-Risk Jurisdiction Involvement:\*\* The wire transfer beneficiary, ACME Investment Management, is located in the Cayman Islands, a jurisdiction associated with elevated money laundering risks.

4. \*\*Lack of Identifiable Relationship:\*\* No legitimate connection exists between John Diamond and ACME Investment Management per KYC records.

5. \*\*Rapid Movement of Funds:\*\* Immediate outbound transfer of aggregated deposits to an offshore account indicates potential layering.

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\*\*5. CLOSING STATEMENT\*\*

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.

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\*\*End of Report\*\*