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 09/02/2024 and 09/13/2024, John Diamond (US) initiated 12 consecutive outgoing wire transfers of $9,000.00 each from LLM NY account ACC-1 to himself at the same account. On 09/14/2024, John Diamond sent a $105,000.00 outgoing wire from ACC-1 to ACME Investment Management in the Cayman Islands. All transactions originated and terminated within LLM NY’s systems, with the exception of the final transfer to the Cayman Islands.

John Diamond (Customer ID: C-1) is an individual in the manufacturing sector residing at 277 Park Ave., New York, NY, 12345, with a date of birth of 04/20/1988 and SSN 123-45-6789. KYC records indicate expected transactional activity limited to ACH and wire transfers within the US. No declared business relationship exists between John Diamond and ACME Investment Management or any entities in the Cayman Islands. Internal due diligence revealed no legitimate explanation for the repetitive self-directed transfers or the final transaction to a high-risk jurisdiction.

These transactions are being reported due to the following:

1. No apparent economic or business purpose for 12 consecutive $9,000.00 transfers between the customer’s own accounts.

2. Unusual transaction patterns indicative of potential structuring, with repeated round-dollar amounts below $10,000.

3. High-risk jurisdiction involvement through the final $105,000.00 transfer to the Cayman Islands without declared nexus.

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

5. Activity inconsistent with the customer’s declared line of business (non-cash-intensive manufacturing sector).

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.