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.

\*\*Transaction Summary\*\*

Between September 2, 2024, and September 13, 2024, John Diamond (US) initiated 12 consecutive outgoing wire transfers of $9,000.00 each from his personal account (ACC-1) at LLM NY to himself at the same account. On September 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 ACC-1, except the final transfer to the Cayman Islands. The repeated $9,000.00 transfers were executed in round-dollar amounts over 13 consecutive days, with no intermediate account activity or supporting documentation provided.

\*\*Customer Profile (KYC) and Relationship Analysis\*\*

John Diamond (Customer ID: C-1), born April 20, 1988 (SSN: 123-45-6789), resides at 277 Park Ave., New York, NY 12345. He is listed as an individual in the manufacturing sector with expected activity limited to domestic ACH and wire transactions. KYC records show no declared business ties to the Cayman Islands or ACME Investment Management. Internal due diligence identified no legitimate commercial purpose for the self-directed transfers or the offshore beneficiary. Critical KYC data gaps include missing employment verification, source of wealth documentation, and rationale for international activity.

\*\*Suspicious Activity Reasons\*\*

These transactions are being reported due to the following:

1. \*\*Structured Transactions\*\*: Twelve consecutive $9,000.00 transfers below the $10,000.00 reporting threshold, indicative of potential cash structuring.

2. \*\*No Apparent Economic Purpose\*\*: Circular self-transfers with no commercial justification, inconsistent with declared manufacturing business.

3. \*\*High-Risk Jurisdiction Exposure\*\*: Final $105,000.00 transfer to Cayman Islands (a jurisdiction with heightened money laundering risks) without declared nexus.

4. \*\*Mirror Transaction Patterns\*\*: Immediate outflow of aggregated funds ($108,000.00) to offshore entity after 12-day accumulation.

5. \*\*Unverified Beneficiary Relationship\*\*: No identifiable connection between John Diamond and ACME Investment Management per KYC records.

\*\*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.