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 in question occurred as follows:

On 09/02/2024, John Diamond (US) sent a wire of $9,000.00 to John Diamond (US) at LLM NY account ACC-1.

On 09/03/2024, John Diamond (US) sent a wire of $9,000.00 to John Diamond (US) at LLM NY account ACC-1.

On 09/04/2024, John Diamond (US) sent a wire of $9,000.00 to John Diamond (US) at LLM NY account ACC-1.

On 09/05/2024, John Diamond (US) sent a wire of $9,000.00 to John Diamond (US) at LLM NY account ACC-1.

On 09/06/2024, John Diamond (US) sent a wire of $9,000.00 to John Diamond (US) at LLM NY account ACC-1.

On 09/07/2024, John Diamond (US) sent a wire of $9,000.00 to John Diamond (US) at LLM NY account ACC-1.

On 09/08/2024, John Diamond (US) sent a wire of $9,000.00 to John Diamond (US) at LLM NY account ACC-1.

On 09/09/2024, John Diamond (US) sent a wire of $9,000.00 to John Diamond (US) at LLM NY account ACC-1.

On 09/10/2024, John Diamond (US) sent a wire of $9,000.00 to John Diamond (US) at LLM NY account ACC-1.

On 09/11/2024, John Diamond (US) sent a wire of $9,000.00 to John Diamond (US) at LLM NY account ACC-1.

On 09/12/2024, John Diamond (US) sent a wire of $9,000.00 to John Diamond (US) at LLM NY account ACC-1.

On 09/13/2024, John Diamond (US) sent a wire of $9,000.00 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 expected products are ACH and Wire, and the expected geographies are the US. The customer's Date of Birth is 1988-04-20, and the SSN is 123-45-6789. The customer's address is 277 Park Ave., New York, NY, 12345. Based on the provided KYC information, there appears to be no legitimate relationship between John Diamond and the entities involved in the transactions, particularly ACME Investment Management in the Cayman Islands.

These transactions are being reported due to the following:

1. No apparent economic or business purpose for the repeated wires to the same account.

2. Possible shell company or funnel account activity, given the nature of the transactions and the involvement of ACME Investment Management in the Cayman Islands.

3. Unusual transaction patterns, including the consistent round dollar amounts of $9,000.00.

4. High-risk jurisdiction involvement, specifically the Cayman Islands, which is known for its secrecy and potential for illicit financial activities.

5. Lack of identifiable relationship between John Diamond and ACME Investment Management or the Cayman Islands, based on the provided KYC information.

6. The transactions may be indicative of cash structuring, given the consistent amounts below the $10,000 reporting threshold.

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.