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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\*\*Transaction Summary:\*\*

Between September 2, 2024, and September 13, 2024, John Diamond (Customer ID: C-1) deposited $9,000.00 in cash daily into account ACC-1 for 12 consecutive days, totaling $108,000.00. On September 14, 2024, a wire transfer of $105,000.00 was sent from ACC-1 to ACME Investment Management, located in the Cayman Islands. The originator of the wire was John Diamond, and no intermediary institutions were noted. All transactions involved U.S. dollars, with the cash deposits processed domestically and the outgoing wire routed to a high-risk jurisdiction.

The cash deposits were structured in round-dollar amounts below the $10,000.00 regulatory reporting threshold. The subsequent wire transfer closely followed the deposit activity, with no observable delay between fund accumulation and disbursement.

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

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

\*\*Line of Business:\*\* Manufacturing (non-cash-intensive sector).

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

\*\*Account Activity:\*\* Declared expected products include ACH and wire transfers, with anticipated geographic activity limited to the U.S.

LLM NY’s review identified no legitimate business relationship between John Diamond, ACME Investment Management, or the Cayman Islands. Internal and external due diligence revealed no declared nexus with the Cayman Islands, nor did the customer provide documentation justifying the wire transfer’s purpose. KYC records lack details on the customer’s specific manufacturing operations, cash revenue sources, or ties to investment entities.

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\*\*Suspicious Activity Reasons:\*\*

These transactions are being reported due to the following:

1. \*\*Structuring of cash deposits\*\*: Twelve consecutive $9,000.00 deposits below the $10,000.00 reporting threshold, inconsistent with the customer’s non-cash-intensive business.

2. \*\*No apparent economic or business purpose\*\*: No legitimate source of funds declared for the cash deposits, and no rationale provided for the $105,000.00 transfer to a high-risk jurisdiction.

3. \*\*High-risk jurisdiction involvement\*\*: Beneficiary ACME Investment Management is located in the Cayman Islands, a jurisdiction associated with elevated money laundering risks.

4. \*\*Lack of identifiable relationship\*\*: No declared or verified connection between John Diamond’s manufacturing business and the Cayman Islands beneficiary.

5. \*\*Rapid fund movement\*\*: Immediate outbound transfer of aggregated deposits, indicative of potential layering.

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\*\*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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\*\*Prepared by:\*\* [REDACTED]

\*\*Date:\*\* [REDACTED]