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 involve 12 consecutive cash deposits into the account of John Diamond (Customer ID: C-1, Account ID: ACC-1) from 09/02/2024 to 09/13/2024, each deposit being $9,000.00. On 09/14/2024, a wire transfer of $105,000.00 was sent from John Diamond's account to ACME Investment Management in the Cayman Islands. All transactions were initiated by John Diamond, with the cash deposits being incoming transactions and the wire transfer being an outgoing transaction.

John Diamond (Customer ID: C-1) is classified as an individual in the Manufacturing sector, incorporated/residing in the US. The expected products for this customer are ACH and Wire, with expected geographies being the US. However, the customer's recent activity does not align with these expectations, as the customer is not in a cash-intensive business and there is no declared nexus with the Cayman Islands or ACME Investment Management. The KYC information available does not provide a reasonable explanation for the customer's activity, particularly the structured cash deposits and the subsequent wire transfer to an offshore investment management company.

These transactions are being reported due to the following:

1. No apparent economic or business purpose for the cash deposits and subsequent wire transfer.

2. Possible shell company or funnel account involvement, given the nature of the transactions and the recipient of the wire transfer.

3. Unusual transaction patterns, including the structured cash deposits and the large wire transfer shortly after.

4. High-risk jurisdiction involvement, as the wire transfer was sent to the Cayman Islands, which is considered a high-risk jurisdiction for money laundering.

5. Lack of identifiable relationship between John Diamond and ACME Investment Management or the Cayman Islands.

6. Cash structuring, as evidenced by the 12 consecutive cash deposits of $9,000.00 each, which may indicate an attempt to avoid reporting thresholds.

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.