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 deposited $9,000.00 in cash daily into account ACC-1 for 12 consecutive days, totaling $108,000.00. On September 14, 2024, a $105,000.00 outgoing wire transfer was initiated from ACC-1 to ACME Investment Management, a beneficiary in the Cayman Islands. The cash deposits were made in round-dollar amounts at or below the Currency Transaction Report (CTR) threshold. The funds were rapidly consolidated and transferred offshore within two days of the final deposit.

CUSTOMER PROFILE (KYC) AND RELATIONSHIP ANALYSIS

John Diamond (Customer ID: C-1) is a U.S. resident individual purportedly engaged in the manufacturing sector. KYC records indicate expected transactional activity limited to ACH and wire transfers within the U.S. No corporate registration, business licenses, or documented ties to cash-intensive operations were identified. LLM NY’s review found no declared or verifiable relationship between Diamond, ACME Investment Management, or the Cayman Islands. KYC records lack supporting documentation for source of wealth, business revenue models, or justification for offshore financial activity.

SUSPICIOUS ACTIVITY REASONS

These transactions are being reported due to the following:

1. \*\*No apparent economic or business purpose\*\*: The customer’s manufacturing occupation does not align with frequent high-value cash deposits or sudden offshore transfers.

2. \*\*Possible structuring of cash deposits\*\*: Twelve consecutive $9,000.00 deposits suggest intentional avoidance of CTR reporting thresholds.

3. \*\*High-risk jurisdiction involvement\*\*: Funds were transferred to the Cayman Islands, a jurisdiction associated with elevated AML/CFT risks.

4. \*\*Unusual transaction patterns\*\*: Rapid aggregation of cash deposits followed by an immediate large wire to an unrelated offshore entity.

5. \*\*Lack of identifiable relationship\*\*: No legitimate business nexus exists between the customer and the Cayman Islands beneficiary.

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.