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 a series of cash deposits made by John Diamond (Customer ID: C-1) into his account ACC-1. On 9/2/2024, John Diamond made a cash deposit of $9,000.00. This was followed by similar cash deposits of $9,000.00 on 9/3/2024, 9/4/2024, 9/5/2024, 9/6/2024, 9/7/2024, 9/8/2024, 9/9/2024, 9/10/2024, 9/11/2024, 9/12/2024, and 9/13/2024. Each of these deposits was for a round dollar amount of $9,000.00, totaling $108,000.00 over 12 consecutive days. On 9/14/2024, John Diamond then sent a wire transfer of $105,000.00 to ACME Investment Management in the Cayman Islands.

John Diamond, with Customer ID: C-1, is classified as an individual in the Manufacturing sector, incorporated/residing in the US. According to our internal KYC data, his expected products are ACH and Wire, and his expected geographies are limited to the US. There is no apparent legitimate relationship between John Diamond and ACME Investment Management in the Cayman Islands, as indicated by our KYC information and external research. The customer's line of business does not suggest a need for frequent large cash transactions or international wire transfers to high-risk jurisdictions like the Cayman Islands.

These transactions are being reported due to the following:

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

2. Possible shell company or funnel account involvement, given the lack of connection between John Diamond and ACME Investment Management.

3. Unusual transaction patterns, including the structured cash deposits and the wire transfer to a high-risk jurisdiction.

4. High-risk jurisdiction involvement, as the wire transfer was sent to the Cayman Islands, a jurisdiction known for its secrecy and potential for illicit financial activities.

5. Lack of identifiable relationship between John Diamond and the beneficiary of the wire transfer, ACME Investment Management.

6. Cash structuring, as evidenced by the series of cash deposits 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.