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.

Between 09/02/2024 and 09/14/2024, 12 cash deposits of $9,000.00 each were made into the account of John Diamond (Customer ID: C-1, Account ID: ACC-1). 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.

John Diamond (Customer ID: C-1) is classified as an Individual in the Manufacturing sector, incorporated/residing in the US. According to our internal KYC data, the customer's expected products are ACH and Wire, and the expected geographies are US. However, our analysis indicates that John Diamond's line of business is not cash-intensive, and there is no declared nexus with the Cayman Islands or ACME Investment Management. No reasonable explanation for the customer's activity has been identified, suggesting a potential lack of legitimate relationship between the entities involved.

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 lack of connection between John Diamond and ACME Investment Management.

3. Unusual transaction patterns, including structured cash deposits and a significant 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.

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.

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.