ALERT NARRATIVE

Alert #: A-1 Create Date: 9/30/2024

Focal Entity: John Diamond

CIN: C-1

Review Scope: 9/2/2024 – 9/14/2024

Determination / Rationale:

Based on a review of internal and external sources, the reviewed transactions appear to potential suspicious.

Cash Structuring \$10k
Rapid Movements of Funds
Large Wire to High Risk Jurisdiction

The customer made 12 cash deposits for \$9,000.00 each, totaling \$108,000.00 over the course of 12 consecutive days between 9/2/2024 and 9/13/2024. According to KYC information, the customer is employed in the manufacturing industry, which is not a cash-intensive business and investigation of internal and external sources did not identify a legitimate source of funds for these cash deposits. On 9/14/2024, the customer then sent a wire transfer for \$105,000.000 to ACME Investment Management in the Cayman Islands. The customer's KYC information does not indicate any apparent connection between either ACME Investment Management or the Cayman Islands.

A SAR filing is recommended for the following reasons:

- The customer apparently made 12 structured cash deposits for \$9,000 each over 12 consecutive days without a legitimate source of funds.
- Shortly after make the cash deposits, the customer initiated a wire transfer to an unrelated company with which the customer has no apparent connection.
- There is no apparent lawful economic purpose for the customer's activity.
- The involvement of the high risk jurisdiction of the Cayman Islands.