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 2024-1234) to report 13 transactions totaling $213,000.00 and sent between 9/2/2024 and 9/14/2024.

Between 9/2/2024 and 9/13/2024, John Diamond (“Diamond”) (United States) made 12 cash deposits for $9,000.00 each, totaling $108,000.00, to account ACC-1 (the “Subject Account”) at LLM NY. The deposits were made over the course of 12 consecutive days.

On 9/14/2024, Diamond sent a wire transfer for $105,000.00 from the Subject Account to account 135091235871 at Gator Bank (Cayman Islands) held by ACME Investment Management Inc. (“ACME”) (Cayman Islands).

Internal LLM NY KYC information identified Diamond with the following details: DOB: 4/20/1988; SSN: 123-45-6789; address: 277 Park Ave., New York, NY, 12345; and occupation: manufacturing. There is no apparent connection between Diamond and ACME or the Cayman Islands.

External research was unable to conclusively identify a line of business for ACME.

This transaction is being reported due to the following: (1) the involvement of a possible shell company; (2) apparent cash structuring; (3) transactions with no apparent economic or business purpose; and (4) the involvement of the foreign high-risk jurisdiction of the Cayman Islands Islands.

This SAR pertains to LLM NY Case No. 2024-1234. 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.