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 transactions totaling $213,000.00 and sent between 09/02/2024 and 09/14/2024.

On 9/2/2024 to 9/13/2024, the customer made 12 structured cash deposits totaling $108,000.00. On 9/14/2024, the customer sent a wire transfer of $105,000.00 to ACME Investment Management in the Cayman Islands. The transactions appear suspicious due to the large amount of cash deposits in a short period and the subsequent wire transfer to a high-risk jurisdiction.

The cash deposits were made in the amount of $9,000.00 each, and the wire transfer was initiated to an unrelated company with which the customer has no apparent connection. The transactions lack a legitimate economic purpose, and the involvement of the Cayman Islands, a high-risk jurisdiction, further raises suspicions.

John Diamond, date of birth not specified, social security number not specified, address not specified, is employed in the manufacturing industry, with no apparent connection to ACME Investment Management or the Cayman Islands, based on the provided information. External research did not provide details on the lines of business of ACME Investment Management, but the customer's occupation in the manufacturing industry does not suggest a cash-intensive business. The customer's employment and the wire transfer to the Cayman Islands suggest a lack of a lawful economic purpose for the transactions.

This transaction is being reported due to the following:

1. The customer apparently made 12 structured cash deposits for $9,000 each over 12 consecutive days without a legitimate source of funds.

2. Shortly after making the cash deposits, the customer initiated a wire transfer to an unrelated company with which the customer has no apparent connection.

3. The customer’s wire transfer to ACME Investment Management in the Cayman Islands, a high-risk jurisdiction, further raises suspicion as there is no apparent lawful economic purpose for the customer’s activity.

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.