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 September 2, 2024, and September 13, 2024, John Diamond (US) initiated 12 consecutive outgoing wire transfers of $9,000.00 each from LLM NY account ACC-1 to himself, totaling $108,000.00. All transactions originated and terminated within the US. On September 14, 2024, a single outgoing wire transfer of $105,000.00 was sent from ACC-1 to ACME Investment Management in the Cayman Islands.

John Diamond (Customer ID: C-1) is an individual in the manufacturing sector residing in the US. KYC records indicate expected transactional activity limited to ACH and wire transfers within US geographies. The customer’s occupation does not typically involve cash-intensive operations or international transactions. Key KYC fields, including Social Security Number (SSN), date of birth, and physical address, are incomplete, limiting the ability to verify legitimacy of activity. No declared business relationship exists between John Diamond and ACME Investment Management (Cayman Islands) or other counterparties.

These transactions are being reported due to the following:

1. No apparent economic or business purpose for 12 consecutive $9,000.00 transfers from the customer to himself, followed by a $105,000.00 transfer to a high-risk jurisdiction.

2. Structuring of transactions below $10,000.00 threshold across 12 days, consistent with potential evasion of reporting requirements.

3. Use of round-dollar amounts in all transactions, atypical for legitimate manufacturing operations.

4. Disproportionate final transfer to the Cayman Islands, a jurisdiction associated with elevated money laundering risks, with no declared nexus to the customer’s profile.

5. Incomplete KYC information, including missing SSN, DOB, and address, hindering verification of transactional legitimacy.

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.