\*\*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.\*\*

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\*\*Transaction Summary\*\*

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

The 12 initial transactions involved round-dollar amounts and rapid, consecutive transfers over 13 days. The final transaction to ACME Investment Management, a high-risk jurisdiction, deviated from the prior pattern by consolidating funds into a single large transfer.

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\*\*Customer Profile (KYC) and Relationship Analysis\*\*

\*\*Legal Name\*\*: John Diamond

\*\*Customer ID\*\*: C-1

\*\*Line of Business\*\*: Manufacturing (Individual)

\*\*Residency\*\*: U.S.

\*\*Account ID\*\*: ACC-1

\*\*Expected Products\*\*: ACH, Wire

\*\*Expected Geographies\*\*: U.S.

KYC records indicate John Diamond is an individual in the manufacturing sector, which is not cash-intensive. No declared nexus with the Cayman Islands or ACME Investment Management was identified. Internal and external research revealed no legitimate business relationship between John Diamond and ACME Investment Management.

KYC data lacks the customer’s date of birth, Social Security Number, and physical address, hindering comprehensive risk assessment.

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\*\*Suspicious Activity Reasons\*\*

These transactions are being reported due to the following:

1. \*\*No apparent economic or business purpose\*\*: The 12 consecutive $9,000.00 transfers from John Diamond to himself lack a discernible rationale.

2. \*\*Possible structuring\*\*: The repeated $9,000.00 transactions, just below the $10,000.00 reporting threshold, suggest intentional avoidance of scrutiny.

3. \*\*High-risk jurisdiction involvement\*\*: The final $105,000.00 transfer to the Cayman Islands, a jurisdiction associated with elevated money laundering risks, is inconsistent with the customer’s profile.

4. \*\*Lack of identifiable relationship\*\*: No declared or verified connection exists between John Diamond and ACME Investment Management.

5. \*\*Round-dollar amounts and mirror transactions\*\*: The uniformity of amounts and self-directed transfers indicate potential layering or funneling activity.

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\*\*Closing Statement\*\*

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.