\*\*1. Standard Introductory Statement\*\*

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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\*\*2. Transaction Summary\*\*

Between September 2, 2024, and September 13, 2024, John Diamond (US) initiated twelve (12) consecutive outgoing wire transfers of $9,000.00 each from his account (ACC-1) at LLM NY to himself at the same account. All transactions originated and terminated domestically within the U.S. On September 14, 2024, John Diamond sent a single outgoing wire of $105,000.00 from ACC-1 to ACME Investment Management, a beneficiary incorporated in the Cayman Islands. The cumulative activity reflects repeated round-dollar transfers followed by a large disbursement to a high-risk jurisdiction.

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\*\*3. Customer Profile (KYC) and Relationship Analysis\*\*

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

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

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

\*\*Residency:\*\* United States

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

\*\*Products Used:\*\* ACH, Wire

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

KYC records indicate John Diamond operates as an individual in the manufacturing sector, which is not typically cash-intensive. No legitimate business rationale or documented relationship was identified between John Diamond and ACME Investment Management (Cayman Islands). The customer’s profile lacks evidence of international business ties, and the beneficiary jurisdiction (Cayman Islands) is flagged as high-risk for financial opacity. Key KYC fields, including the customer’s date of birth, SSN, and physical address, are incomplete, hindering comprehensive risk assessment.

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\*\*4. Suspicious Activity Reasons\*\*

These transactions are being reported due to the following:

1. \*\*No Apparent Economic or Business Purpose:\*\* The repetitive transfers to the same account, followed by a lump-sum disbursement to a high-risk jurisdiction, lack a discernible lawful rationale.

2. \*\*Structuring Behavior:\*\* Twelve consecutive $9,000.00 transactions suggest deliberate avoidance of thresholds requiring enhanced scrutiny.

3. \*\*High-Risk Jurisdiction Involvement:\*\* The final transfer to ACME Investment Management (Cayman Islands) raises concerns due to the jurisdiction’s association with offshore financial activities.

4. \*\*Unusual Transaction Patterns:\*\* Mirror transactions (self-directed transfers) and rapid movement of funds within a condensed timeframe deviate from expected activity for a manufacturing business.

5. \*\*Lack of Identifiable Relationship:\*\* No documented nexus exists between John Diamond and the Cayman Islands beneficiary.

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\*\*5. 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.

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\*\*End of SAR Narrative\*\*