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.

The transactions in question occurred as follows:

On 09/02/2024, John Diamond (US) sent a wire of $9,000.00 to John Diamond (US) at LLM NY account ACC-1.

On 09/03/2024, John Diamond (US) sent a wire of $9,000.00 to John Diamond (US) at LLM NY account ACC-1.

On 09/04/2024, John Diamond (US) sent a wire of $9,000.00 to John Diamond (US) at LLM NY account ACC-1.

On 09/05/2024, John Diamond (US) sent a wire of $9,000.00 to John Diamond (US) at LLM NY account ACC-1.

On 09/06/2024, John Diamond (US) sent a wire of $9,000.00 to John Diamond (US) at LLM NY account ACC-1.

On 09/07/2024, John Diamond (US) sent a wire of $9,000.00 to John Diamond (US) at LLM NY account ACC-1.

On 09/08/2024, John Diamond (US) sent a wire of $9,000.00 to John Diamond (US) at LLM NY account ACC-1.

On 09/09/2024, John Diamond (US) sent a wire of $9,000.00 to John Diamond (US) at LLM NY account ACC-1.

On 09/10/2024, John Diamond (US) sent a wire of $9,000.00 to John Diamond (US) at LLM NY account ACC-1.

On 09/11/2024, John Diamond (US) sent a wire of $9,000.00 to John Diamond (US) at LLM NY account ACC-1.

On 09/12/2024, John Diamond (US) sent a wire of $9,000.00 to John Diamond (US) at LLM NY account ACC-1.

On 09/13/2024, John Diamond (US) sent a wire of $9,000.00 to John Diamond (US) at LLM NY account ACC-1.

On 09/14/2024, ACME Investment Management (KY) received a wire of $105,000.00 from John Diamond (US) sent from LLM NY account ACC-1.

All transactions were in US dollars and involved LLM NY account ACC-1. The transactions show a pattern of round dollar amounts and rapid movement of funds.

John Diamond (Customer ID: C-1) is classified as an individual in the manufacturing sector, incorporated/residing in the US. The customer's expected products are ACH and wire, and the expected geographies are the US. However, the customer's activity does not align with the expected business purpose, as the customer is not in a cash-intensive business. Furthermore, there is no declared nexus with the recipient of the $105,000.00 wire, ACME Investment Management in Kentucky.

These transactions are being reported due to the following:

1. No apparent economic or business purpose for the transactions, as the customer is not in a cash-intensive business and there is no reasonable explanation for the customer activity.

2. Possible shell company or funnel account, as the transactions involve round dollar amounts and rapid movement of funds.

3. Unusual transaction patterns, as the customer sent 12 wires of $9,000.00 each to themselves over the course of 12 consecutive days.

4. Lack of identifiable relationship between entities, as there is no declared nexus with the recipient of the $105,000.00 wire, ACME Investment Management.

5. Cash structuring, as the customer made 12 cash deposits for $9,000.00 each, totaling $108,000.00, which is below the reporting threshold for cash transactions.

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.