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 between 09/02/2024 and 09/14/2024. On 09/02/2024, John Diamond sent a wire of $9,000.00 to John Diamond at LLM NY account ACC-1. This pattern continued for 12 consecutive days, with each transaction being $9,000.00. On 09/14/2024, ACME Investment Management received a wire of $105,000.00 from John Diamond sent from LLM NY account ACC-1. All transactions were incoming and outgoing from the same account, ACC-1, belonging to John Diamond.

John Diamond, with Customer ID C-1, is classified as an individual in the manufacturing sector, incorporated and residing in the US. The expected products for this customer are ACH and wire, with expected geographies being the US. However, the transactions do not align with these expectations, as there is no apparent connection between John Diamond and ACME Investment Management or the jurisdictions involved in the transactions. The customer's line of business does not suggest a need for such frequent and structured transactions. The KYC information available does not provide a clear rationale for these transactions, and external research did not identify a legitimate relationship between the entities involved.

These transactions are being reported due to the following:

1. No apparent economic or business purpose for the frequent, structured transactions.

2. Possible shell company or funnel account usage, given the lack of identifiable relationship between John Diamond and the beneficiaries of the transactions.

3. Unusual transaction patterns, including the repetition of $9,000.00 transactions over consecutive days.

4. High-risk jurisdiction involvement, considering the transaction with ACME Investment Management, which may indicate a connection to high-risk areas.

5. Lack of identifiable relationship between entities, as John Diamond's KYC information does not indicate any connection to ACME Investment Management or the involved jurisdictions.

6. Cash structuring, as the transactions appear to be structured to avoid reporting thresholds.

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.