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 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.

John Diamond (Customer ID: C-1) is 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 US. However, the customer is not in a cash-intensive business, and there is no declared nexus with KY. Investigation of internal and external sources did not identify a reasonable explanation for customer activity.

These transactions are being reported due to the following:

1. No apparent economic or business purpose for the round dollar wires sent to the customer's own account.

2. Possible shell company or funnel account involvement given the lack of identifiable relationship between John Diamond and ACME Investment Management.

3. Unusual transaction patterns, including rapid movement of funds and mirror transactions to the customer’s own account.

4. High-risk jurisdiction involvement, as indicated by the wire transfer to ACME Investment Management in KY.

5. Lack of identifiable relationship between John Diamond and ACME Investment Management, or any other entities involved in the transactions.

6. Cash structuring, as evidenced by the consistent $9,000.00 wire transfers over a short period.

7. Round dollar amounts and mirror wires, which are unusual in the normal course of business for a manufacturing industry customer.

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.