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 2025-0004) to report 4 transaction(s) totaling $3,789,654.00 and sent between 09/03/2024 and 09/06/2024.

The transactions in question occurred as follows: On 09/03/2024, Venezuela Law (VE) sent a wire of $789,654.00 to JDF Industries (US) at LLM NY account ACC-5. On 09/04/2024, JDF Industries - Citibank Account (US) received a wire of $1,000,000.00 from JDF Industries (US) sent from LLM NY account ACC-5. The next day, 09/05/2024, JDF Industries - Citibank Account (US) sent a wire of $1,000,000.00 back to JDF Industries (US) at LLM NY account ACC-5. Finally, on 09/06/2024, Venezuela Oil (VE) received a wire of $1,000,000.00 from JDF Industries (US) sent from LLM NY account ACC-5. These transactions involve jurisdictions in the US and Venezuela, with the US being the country of incorporation for JDF Industries and Venezuela being the country of origin and destination for the funds.

JDF Industries, with Customer ID: C-4, is classified as a Business in the Oil refinement sector, incorporated in the US. The expected products for this customer include ACH and Wire transactions, with expected geographies limited to the US and South America. However, the transactions reported here involve round dollar amounts and rapid movement of funds, which is unusual for the customer's stated line of business. There appears to be no legitimate economic or business purpose for these transactions, as the funds are being moved in a circular manner without any clear commercial rationale. Furthermore, the involvement of high-risk jurisdictions such as Venezuela raises additional concerns.

These transactions are being reported due to the following:

1. No apparent economic or business purpose for the transactions, as they involve the circular movement of funds without a clear commercial rationale.

2. Possible shell company or funnel account involvement, given the rapid movement of funds and the lack of transparency regarding the ultimate beneficial owners of the entities involved.

3. Unusual transaction patterns, including the use of round dollar amounts and the rapid movement of funds between accounts.

4. High-risk jurisdiction involvement, specifically Venezuela, which is subject to various sanctions and has a high risk of money laundering and terrorist financing.

5. Lack of identifiable relationship between entities, as there is no clear connection between JDF Industries and the originators and beneficiaries of the transactions.

This SAR pertains to LLM NY Case No. 2025-0004. 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.