

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 2025-1236) to report four (4) transactions totaling \$3,789,654.00 that occurred between 9/3/2024 and 9/6/2024.

On 9/3/2024, JDF Industries (United States) received a wire transfer for \$789,654.00 to account ACC-5 at LLM NY. The wire was originated by Venezuela Law (Cayman Islands).

Between 9/4/2024 and 9/5/2024, JDF Industries sent \$1,000,000.00 to an external account also in the name of JDF Industries and then received a wire in an identical amount from that same external account.

On 9/6/2024, JDF Industries sent a wire transfer to Venezuela Oil (Venezuela) for \$1,000,000.00 from account ACC-5.

LLM NY KYC information identifies JDF Industries as an Oil Refiner. Internal and external research could not identify any relationship between JDF Industries and either Venezuela Law or Venezuela Oil.

These transactions are being reported due to the following: (1) the lack of an economic relationship between the transacting parties, (2) the lack of an apparent economic purpose for the pattern of transaction activity; and (3) the involvement of multiple high risk jurisdictions that the customer has no apparent connection to.

This SAR pertains to LLM NY Case No. 2025-1236. 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.