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 4 transactions totaling $3,789,654.00 and sent between 09/03/2024 and 09/06/2024.

Between 9/3/2024 – 9/7/2024, the customer received two wires totaling $1,789,654.00, and the outgoing activity during that time consisted of three wires totaling $9,238,475.00. The customer generated an alert due to receiving a wire transfer from Venezuela Law for $789,654 and then sending $1,000,000 to an external account at Citibank, receiving the funds back, and then sending those funds to Venezuela Oil. The customer also sent a wire transfer for $7,238,475.00 to Aramco, however, this transaction was determined to be reasonable and is excluded from this report.

The suspicious transactions include a wire transfer from Venezuela Law in the Cayman Islands for $789,654, and a wire transfer to Venezuela Oil in Venezuela for $1,000,000. The transactions involved the customer's account, and the funds were transferred within a short period of time, raising concerns about the ultimate originator and beneficiary of the transactions, as well as the apparent lack of lawful economic purpose.

The client, JDF Industries, is an oil refiner with no apparent connection to the Cayman Islands or Venezuela, but has an existing relationship with Aramco, with which they conducted a transaction that appears reasonable and in-line with expected activity; the client received wires from Venezuela Law in the Cayman Islands, with no apparent connection, and subsequently sent funds to Venezuela Oil, also with no apparent connection, raising questions about the legitimacy of these transactions. External research indicates that Aramco is a Saudi Arabian oil company, while Venezuela Oil is a Venezuelan oil company, and Venezuela Law is a law firm based in the Cayman Islands, suggesting a potential complex web of transactions and relationships that warrant further investigation. The client's occupation as an oil refiner and their connections to these companies, or lack thereof, are key factors in understanding the suspicious activity.

This transaction is being reported due to the following:

(1) the customer received a wire from the Cayman Islands, an unrelated jurisdiction with which the customer has no apparent connection,

(2) the customer initiated a wire transfer to an unrelated company in Venezuela, a high-risk jurisdiction with which the customer has no apparent connection,

(3) there is no apparent lawful economic purpose for the pattern of activity that occurred, and

(4) the ultimate originator of the incoming activity and the ultimate beneficiary of the outgoing wire have no apparent connection to the 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.