Use precise terminology and avoid markdown. Use only the data provided. Do not invent any details.

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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 5 transaction(s) totaling $11,028,129.00 and sent between 09/03/2024 and 09/07/2024.

On 09/03/2024, LLM NY account ACC-5 (JDF Industries, US) received an incoming wire of $789,654.00 from Venezuela Law (Cayman Islands). On 09/04/2024, JDF Industries initiated an outgoing wire of $1,000,000.00 from ACC-5 to JDF Industries - Citibank Account (US). On 09/05/2024, ACC-5 received an incoming wire of $1,000,000.00 from JDF Industries - Citibank Account (US). On 09/06/2024, JDF Industries sent an outgoing wire of $1,000,000.00 from ACC-5 to Venezuela Oil (Venezuela). On 09/07/2024, JDF Industries initiated an outgoing wire of $7,238,475.00 from ACC-5 to ARAMCO (Saudi Arabia).

JDF Industries (Customer ID: C-4) is a US-incorporated business in the oil refinement sector. KYC records indicate expected activity involving ACH and wire transactions with US and Saudi Arabian counterparts. Customer records do not disclose connections to Venezuela or the Cayman Islands. Internal and external research identified no legitimate business rationale for transactions involving Venezuela Law, Venezuela Oil, or the Citibank account. KYC data lacks SSN, DOB, and physical address for beneficial owners.

These transactions are being reported due to the following:

1. No apparent economic or business purpose for funds transfers between JDF Industries’ own accounts, followed by rapid redirection to high-risk jurisdictions.

2. Suspicious round-dollar transactions ($1,000,000.00) inconsistent with typical oil refinement operations.

3. Involvement of Venezuela Oil (Venezuela) and Venezuela Law (Cayman Islands), both high-risk jurisdictions with no documented customer relationship.

4. Mirroring transaction patterns with funds cycled through external accounts before international transfers.

5. Lack of identifiable business nexus between JDF Industries and Venezuelan counterparties despite KYC profile limitations.

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.