Use only the data provided and do not invent any additional details. Adhere strictly to the outlined structure and tone. Use the exact transaction dates, amounts, and entities as provided. Do not use markdown.

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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 received an incoming wire of $789,654.00 from Venezuela Law (Cayman Islands) to JDF Industries (US). 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). Three transactions involved round-dollar amounts totaling $9,000,000.00, including mirrored transfers between ACC-5 and the Citibank account within two business days.

JDF Industries (Customer ID: C-4) is a US-based business in oil refinement. KYC records indicate expected transactions with US and Saudi Arabian (SA) counterparties, including ARAMCO. The customer’s KYC profile shows no documented relationships with entities in Venezuela or the Cayman Islands. Internal and external research identified no legitimate business rationale for transactions involving Venezuela Law, Venezuela Oil, or rapid fund cycling through the Citibank account. KYC data does not disclose beneficial ownership details or a comprehensive explanation of the customer’s Venezuelan connections.

These transactions are being reported due to the following:

1. No apparent economic or business purpose for funds received from Venezuela Law (Cayman Islands) and subsequent transfers to Venezuela Oil (Venezuela).

2. Circular movement of $1,000,000 between ACC-5 and JDF Industries’ Citibank account, suggesting possible funnel account activity.

3. Unusual transaction patterns involving high-risk jurisdictions (Venezuela and Cayman Islands) with no documented customer ties.

4. Multiple round-dollar transactions ($1,000,000.00) inconsistent with typical oil refinement industry practices.

5. Lack of identifiable relationship between JDF Industries and Venezuela-based counterparties per KYC records.

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.