# Step 1: Standard Introductory Statement

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.

# Step 2: Transaction Summary

On 09/03/2024, a wire of $789,654.00 was sent from Venezuela Law (KY) to JDF Industries (US) at LLM NY account ACC-5.

On 09/04/2024, a wire of $1,000,000.00 was sent from JDF Industries (US) at LLM NY account ACC-5 to JDF Industries - Citibank Account (US).

On 09/05/2024, a wire of $1,000,000.00 was sent from JDF Industries - Citibank Account (US) to JDF Industries (US) at LLM NY account ACC-5.

On 09/06/2024, a wire of $1,000,000.00 was sent from JDF Industries (US) at LLM NY account ACC-5 to Venezuela Oil (VE).

On 09/07/2024, a wire of $7,238,475.00 was sent from JDF Industries (US) at LLM NY account ACC-5 to ARAMCO (SA).

The transactions involved jurisdictions in the US, Venezuela, Saudi Arabia, and the Cayman Islands.

# Step 3: Customer Profile (KYC) and Relationship Analysis

JDF Industries (Customer ID: C-4) is classified as a Business in the Oil refinement sector, incorporated/residing in the US. Expected products include ACH and Wire, with expected geographies being the US and SA.

However, an investigation of internal and external sources did not identify a reasonable explanation for the transactions involving Venezuela Law and Venezuela Oil, suggesting no apparent legitimate relationship between JDF Industries and these entities.

The customer has an existing relationship with Aramco, as indicated by KYC information, which explains the wire transfer to ARAMCO (SA).

# Step 4: Suspicious Activity Reasons

These transactions are being reported due to the following:

1. No apparent economic or business purpose for the transactions involving Venezuela Law and Venezuela Oil.

2. Possible shell company or funnel account activity due to the rapid movement of funds to and from external accounts.

3. Unusual transaction patterns, including round dollar amounts ($1,000,000.00) and mirror transactions between JDF Industries' accounts at LLM NY and Citibank.

4. High-risk jurisdiction involvement, including transactions with entities in Venezuela and the Cayman Islands.

5. Lack of identifiable relationship between JDF Industries and certain counterparties, such as Venezuela Law and Venezuela Oil.

# Step 5: Closing Statement

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.

The final answer is: $\boxed{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.

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