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## Certified Anti-Money Laundering Specialist



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## **ACAMS Certified Anti-Money Laundering Specialists (the 6th edition) Sample Questions (Q454-Q459):**

### **NEW QUESTION # 454**

When implementing a risk-based approach related to casinos, which risks are related to the customer as an individual? (Choose two.)

- A. Customer from a high-risk country
- B. Use of casino deposit accounts by the customer
- C. Improper use of third parties as customers
- D. Casual customers
- E. Transfer between customers

**Answer: A,D**

Explanation:

When implementing a risk-based approach related to casinos, the risks related to the customer as an individual are mainly based on the customer's profile, behaviour, source of funds, and geographic location. Among the options given, B and D are the most relevant factors that could indicate a higher risk of money laundering or terrorist financing.

Casual customers are those who do not have a regular or established relationship with the casino, and who may visit the casino only once or occasionally. They may not provide sufficient or reliable identification information, or may use false or stolen identities. They may also engage in suspicious transactions, such as large cash purchases of chips, minimal or no gaming activity, or frequent transfers of chips between customers. Casual customers pose a higher risk of money laundering or terrorist financing because they are harder to verify, monitor, and trace by the casino operators.

Customer from a high-risk country is a customer who resides in, or has links to, a country that is subject to sanctions, embargoes, or similar measures, or that is identified by credible sources as having significant levels of corruption, or as being a source, transit, or destination of illicit funds. Such customers pose a higher risk of money laundering or terrorist financing because they may be involved in, or connected to, criminal or terrorist activities, or may be using funds that are derived from or intended for such activities.

References: = The main reference for this question is the document titled "FATF Guidance on the Risk-Based Approach for Casinos" published by the FATF in October 2008. You can access it by clicking [here](#). You can also find more information about the risk-based approach and the customer risks for casinos on the Gambling Commission website and the Exam Answer website.

### **NEW QUESTION # 455**

A startup virtual currency exchange has registered as a money services business and will commence operations in six months. The company will provide digital wallets to customers to hold their virtual currency after purchase. Customers will have the option to conduct purchases of the virtual currency and transfer the currency to and from the digital wallet. The startup must develop an anti-money laundering compliance program prior to launch.

Which two anti-money laundering responsibilities should be considered before business launch? (Choose two.)

- A. Mechanisms to monitor and protect customers' digital wallets from cyber-attacks
- B. Transaction limits consistent with risk appetite
- C. A customer onboarding process
- D. Employees to handle complaints in a timely fashion

**Answer: B,C**

Explanation:

A startup virtual currency exchange that operates as a money services business (MSB) must comply with the anti-money laundering (AML) regulations and standards applicable to MSBs, such as the Bank Secrecy Act (BSA) in the United States. One of the key requirements for MSBs is to develop and implement an effective AML compliance program that covers the following four pillars: internal controls, independent testing, designated compliance officer, and training<sup>12</sup>.

Before launching its operations, the startup should consider the following two AML responsibilities that are essential for its compliance program:

\* A customer onboarding process: The startup should establish a customer identification program (CIP) that verifies the identity of its customers and collects relevant information, such as name, address, date of birth, and identification number<sup>12</sup>. The startup should also perform customer due diligence (CDD) and enhanced due diligence (EDD) for higher-risk customers, such as those who engage in large or frequent transactions, use anonymous or pseudonymous digital wallets, or originate from high-risk jurisdictions<sup>34</sup>. The startup should also screen its customers against sanctions lists and other watchlists to prevent dealing with prohibited or suspicious entities<sup>12</sup>.

\* Transaction limits consistent with risk appetite: The startup should set appropriate transaction limits for its customers based on its risk assessment and risk appetite. Transaction limits can help mitigate the exposure to money laundering and terrorist financing risks, as well as comply with the reporting and recordkeeping obligations under the BSA. For example, the startup should report any cash transactions over \$10,000 or any suspicious transactions over \$2,000 to the Financial Crimes Enforcement Network (FinCEN)<sup>12</sup>. The startup should also monitor its customers' transactions for any unusual or inconsistent patterns or behaviors that may indicate money laundering or other illicit activities<sup>34</sup>.

1: ACAMS CAMS Certification Package - 6th Edition, Chapter 6: AML Compliance Program, pp. 139-1461

2: ACAMS CAMS Certification Video Training Course, Module 6: AML Compliance Program, Lesson 6.1: The Four Pillars of an AML Compliance Program<sup>3</sup>

3: ACAMS CAMS Certification Package - 6th Edition, Chapter 4: Customer Due Diligence, pp. 87-1061

4: ACAMS CAMS Certification Video Training Course, Module 4: Customer Due Diligence, Lesson 4.1: Customer Identification Program and Lesson 4.3: Enhanced Due Diligence<sup>3</sup>

### NEW QUESTION # 456

The compliance officer for a private bank has been tasked with reviewing the procedure for authorized signatories on customer accounts to ensure it is in line with relevant Wolfsberg Anti-Money Laundering Principles for Private Banking.

Which three statements from the procedure are in line with Wolfsberg? (Choose three.)

- A. Where due diligence has been satisfactorily completed on all authorized signers, the responsible private banker may reduce the due diligence performed on the account holder and/or beneficial owner.
- B. If an individual has signing authority over an account but does not act on a professional basis as a manager of funds, the responsible private banker must understand and document the relationship between that authorized signer, the account holder, and, if different, the beneficial owner of the account.
- C. The responsible private banker must establish the identity of a holder of general powers over an account (e.g. a signatory for the account) and, as appropriate, verify that identity.
- D. Where the Authorized Signatory is not a lawyer or accountant, due diligence as to the source of funds and wealth of the Authorized Signatory should be undertaken.
- E. The responsible private banker must obtain the necessary documentation establishing the authorized signer's authority to act on behalf of the account holder or beneficial owner (e.g. a Power of Attorney).

**Answer: B,C,E**

Explanation:

The three statements from the procedure that are in line with Wolfsberg are:

\* B. The responsible private banker must establish the identity of a holder of general powers over an account (e.g. a signatory for the account) and, as appropriate, verify that identity. This is consistent with the Wolfsberg Principle 1.2.1, which states that the bank will establish the identity of its clients and beneficial owners prior to establishing business relationships with such persons<sup>1</sup>.

\* D. The responsible private banker must obtain the necessary documentation establishing the authorized signer's authority to act on behalf of the account holder or beneficial owner (e.g. a Power of Attorney). This is consistent with the Wolfsberg Principle 1.2.3, which states that the bank will obtain the necessary documentation establishing the authority of the authorized signatory to act on behalf of the client or beneficial owner<sup>1</sup>.

\* E. If an individual has signing authority over an account but does not act on a professional basis as a manager of funds, the responsible private banker must understand and document the relationship between that authorized signer, the account holder, and, if different, the beneficial owner of the account. This is consistent with the Wolfsberg Principle 1.2.4, which states that the bank will understand and document the relationship between the authorized signatory, the client and, if different, the beneficial owner of the account<sup>1</sup>.

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1: Wolfsberg Anti-Money Laundering Principles for Private Banking (2012)

### NEW QUESTION # 457

Financial Intelligence Units (FIUs) are responsible for:

- A. the timely dissemination of cases to law enforcement agencies.
- B. sharing evidence with other FIUs.
- C. receiving confirmed reports about committed crimes from accountable and reporting institutions.
- D. responding to requests from law enforcement agencies for information contained in regulatory reports.

**Answer: A**

#### **NEW QUESTION # 458**

Privacy and data protection restrictions placed upon financial institutions (FIs) in the EU require that FIs must:  
(Select Two.)

- A. Inform a customer of any information the FI has obtained as a result of an investigation into unusual activity.
- B. **Apply data minimization to avoid overreach in data collection.**
- C. Engage third parties to supplement any missing customer identification information.
- D. **Follow strict guidelines when using machine learning and artificial intelligence.**

**Answer: B,D**

Explanation:

Financial institutions operating in the EU must comply with GDPR and AML directives, ensuring a balance between privacy and AML compliance.

\* Option B (Correct): Data minimization is a key GDPR principle, ensuring that only necessary data is collected and processed.

\* Option D (Correct): Strict guidelines apply to AI and machine learning models used in AML compliance to prevent bias and ensure transparency.

Why Other Options Are Incorrect:

\* Option A (Incorrect): FIs cannot use third parties to supplement missing customer identification unless proper KYC measures are followed.

\* Option C (Incorrect): Customers cannot be informed about ongoing AML investigations due to "tipping off" restrictions under AML laws.

Best Practices for AML Compliance Under GDPR:

- \* Limit data collection to what is necessary for AML compliance.
- \* Ensure AI and machine learning models comply with transparency regulations.
- \* Prevent unauthorized data access through strict internal controls.

Reference:

EU GDPR Article 5 (Principles for Data Processing)

6th EU AML Directive (6AMLD) on Data Protection in AML

Wolfberg Group Guidance on AI in AML Compliance

#### **NEW QUESTION # 459**

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