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## ACAMS Certified Global Sanctions Specialist Sample Questions (Q17-Q22):

### NEW QUESTION # 17

In the period between the 1983 amendment and the adoption of the current Rule 11 in 1993, which of the following propositions had support in the face of widespread criticism in the legal community:

- A. Rule 11 has too rarely been enforced through nonmonetary sanctions, and with cost-shifting having become the normative sanction
- B. Rule 11, in conjunction with other rules, has tended to impact plaintiffs more frequently and severely than defendants
- C. Rule 11 has occasionally created problems for a party which seeks to assert novel legal contentions
- D. Rule 11 provides little incentive, and perhaps a disincentive, for a party to abandon positions after determining they are no longer supportable in fact or law

**Answer: A,B,C,D**

### NEW QUESTION # 18

Which measures should be incorporated into a comprehensive sanctions framework by a financial institution (FI)? (Select Two.)

- A. The FI must have a robust screening control program with a clear strategy in place.
- B. The FI should not consider a broader set of controls for reviewing at a later stage.
- C. The FI's management information reports should be available to everyone.
- D. The FI should gather the required information on a best-efforts basis.
- E. The FI should ensure comprehensive training for people involved in the alert clearing process.

**Answer: A,E**

Explanation:

A comprehensive sanctions framework requires well-designed operational controls, including thorough training for staff responsible for alert review and sanctions decision-making. Sanctions and Compliance Domains specify that personnel involved in alert clearing must receive appropriate training to ensure awareness of regulatory expectations, sanctions typologies, and escalation procedures. Additionally, the framework must include robust screening controls supported by documented strategy, governance, list-management processes, alert management rules, and ongoing testing. These elements form core requirements of sanctions compliance programs. Management information reports are restricted to need-to-know distribution, and reliance on "best-efforts" is not compliant. Institutions must implement structured, risk-based controls, not minimal-effort approaches.

Reference:

Requirements for sanctions training and staff competency.

Necessity of a robust sanctions screening program with strategic oversight.

Internal governance and control expectations in sanctions frameworks.

### NEW QUESTION # 19

Which are common channels used to circumvent sanctions? (Select Three.)

- A. Correspondent banking
- B. Shell companies
- C. Corporate banking
- D. Retail banking
- E. Trade finance
- F. Online banking

**Answer: A,B,E**

Explanation:

Sanctions evasion commonly occurs through:

- \* Trade finance - manipulating bills of lading, transshipment, falsified documents.
- \* Correspondent banking - indirect access to the financial system through other banks.
- \* Shell companies - concealment of ownership, diversion of goods, and masking sanctioned parties.

Corporate, online, and retail banking may have risks but are not primary evasion channels highlighted in sanctions-evasion typologies.

Reference:

Sanctions evasion indicators involving trade, correspondent networks, and shell structures.

OFAC advisories on high-risk payment channels.

### NEW QUESTION # 20

A financial institution requests documents from a client who is involved in a trading business. Upon receiving the documents, which might be a potential indicator of sanctions evasion? (Select Three.)

- A. Numerous amendments to a trade agreement that obscure the entities involved
- B. Conflicting documentation related to the final user of goods traded
- C. A customer's account statement from another bank shows several cash withdrawals
- D. Shipping instructions that include docking at countries located far from sanctioned territories
- E. Payment instructions of the customer are made online
- F. Falsified documents related to shipping routes taken

**Answer: A,B,F**

#### Explanation:

Sanctions evasion indicators in trade documentation include:

- \* Multiple amendments designed to obscure the parties involved - a classic red flag indicating concealment of the real counterparty.
- \* Falsified or tampered shipping documents - used to hide sanctioned routes, ports, or vessels.
- \* Conflicting end-user documentation - a major warning sign of diversion or concealment of sanctioned recipients.

Cash withdrawals (E) and online payment instructions (F) are AML indicators, but not directly sanctions evasion indicators. Docking at non-sanctioned countries (D) is not suspicious unless used as part of concealment, which is not indicated here.

#### Reference:

Trade-based sanctions evasion red flags (altered documents, falsification, inconsistent end-user information).

Diversion and concealment indicators in trade compliance.

#### NEW QUESTION # 21

If there is going to be a member state resorting to war in breach of the Covenant then state the final judgment for them?

- A. There will be reprisal blockade for it
- B. Forms of violence would fall short of the use of force envisaged for it
- **C. It would be subject to automatic sanctions**
- D. There will be reprisal blockade for it and all economic or financial ties for this will be cut
- E. All economic or financial ties for this will be cut

**Answer: C**

#### NEW QUESTION # 22

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