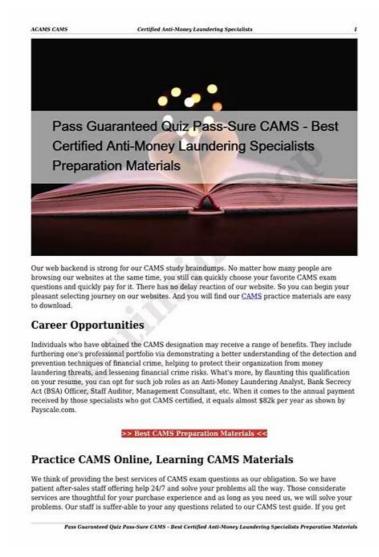
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# ACAMS Certified Anti-Money Laundering Specialists (the 6th edition) Sample Questions (Q156-Q161):

# **NEW QUESTION #156**

The compliance officer at a crowd funding website is in charge of monitoring new crowd funding projects. Recently, the number of crowd funding projects has significantly increased. Which red flag indicates the highest anti-money laundering risk?

- A. Projects that start and close and are fully funded within a very short period
- B. Projects that get funding within days of their start
- C. Projects with the highest monetary success threshold
- D. Those with the largest number of donors

#### Answer: A

#### Explanation:

According to the ACAMS study guide, one of the red flags for money laundering in crowdfunding platforms is "projects that are fully funded within a very short period of time, especially if the funding comes from a small number of donors or from a single donor" (p. 222). This could indicate that the project is a front for laundering illicit funds or financing terrorism. The other options are not necessarily indicative of money laundering risk, as they could be explained by legitimate factors such as the popularity, urgency, or ambition of the project.

### References:

- \* ACAMS. (2020). Study Guide for the Certification Examination for Anti-Money Laundering Specialists (6th ed.). Miami, FL: ACAMS.
- \* ESMA. (2015)Questions and Answers: Investment-based crowdfunding and money laundering/terrorist financing 1. Paris, France: ESMA.

# **NEW QUESTION #157**

Which of the following is the financial stage of money laundering?

- A. placement
- B. integration
- C. structuring
- D. off shoring

#### Answer: B

#### **NEW QUESTION #158**

A bank operates in multiple countries and offers a variety of products and services. The compliance officer recently joined the bank and wants to better understand the inherent level of anti-money laundering risk across the entire organization. Which two factors should be considered? (Choose two.)

- A. Products and services offered by the bank
- B. Countries that the bank operates in
- C. The Transaction Monitoring program
- D. The Customer Due Diligence program

#### Answer: A,B

#### Explanation:

The inherent level of anti-money laundering risk across the entire organization depends on various factors, such as the nature, size, complexity, and structure of the business, the customers, the products and services, and the countries or jurisdictions involved. Among the four options given, the transaction monitoring program and the customer due diligence program are not factors that determine the inherent risk, but rather measures that mitigate the risk. Therefore, they are not relevant for the compliance officer's purpose. The countries that the bank operates in and the products and services offered by the bank are important factors that affect the inherent risk, as they may expose the bank to different levels of money laundering threats, vulnerabilities, and regulatory requirements. For example, some countries or jurisdictions have high levels of corruption, unstable governments, or are known as money laundering havens 1. They could also have inadequate AMIL/CFT regulatory and judicial frameworks, or be subject to economic sanctions 2. Similarly, some products and services may pose higher risks than others, such as those that involve cash transactions, cross-border transfers, anonymous or non-face-to-face customers, or complex or innovative features 34. Reference:

- 1: AML risk-rating models | McKinsey
- 2: Money laundering and terrorist financing risks Financial Action Task Force (FATF)
- 4: AML Red Flags What are the Top 10 Indicators? ComplyAdvantage
- 5: Anti Money Laundering Risk Assessment Financial Crime Academy

#### **NEW QUESTION #159**

the Financing of Terrorism (CFT)]

A foreign politically exposed person (PEP) requests to add a beneficiary to a file insurance policy. How should the request be processed to mitigate risk?

- A. Decline the request to add a beneficiary due to increased risk
- B. Decline the request if the beneficiary is a foreign PEP
- C. Determine the source of wealth and source of funds
- D. Perform due diligence on the beneficiary

#### Answer: D

#### Explanation:

According to the FATF Recommendation 12, financial institutions should take reasonable measures to determine whether the beneficiaries of a life insurance policy and/or, where required, the beneficial owner of the beneficiary are politically exposed persons. This should occur at the latest at the time of the payout1. The purpose of this requirement is to prevent the abuse of life insurance products for money laundering or terrorist financing by PEPs or their associates. Therefore, the best way to mitigate the risk of adding a beneficiary to a life insurance policy for a foreign PEP is to perform due diligence on the beneficiary, such as verifying their identity, relationship with the PEP, and source of funds2.

The other options are not correct because they either do not comply with the FATF standards, or do not adequately address the risk of adding a beneficiary to a life insurance policy for a foreign PEP. Determining the source of wealth and source of funds is a measure that should be applied to the PEP as the customer, not the beneficiary, as part of the enhanced due diligence process2. Declining the request if the beneficiary is a foreign PEP may not be feasible or proportional, as not all foreign PEPs are involved in money laundering or terrorist financing, and some may have legitimate reasons to add a beneficiary to their life insurance policy. Declining the request to add a beneficiary due to increased risk may also not be feasible or proportional, as it may violate the contractual rights of the PEP as the customer, and may not be necessary if the due diligence on the beneficiary does not reveal any red flags or suspicions.: https://complyadvantage.com/insights/peps-life-insurance/

https://www.cfatf-gafic.org/index.php/documents/fatf-40r/378-fatf-recommendation-12-politically-exposed-persons

## **NEW QUESTION # 160**

Which event occurs most frequently in money laundering in the insurance industry?

- A. Failing to take advantage of the free-look period
- B. Redeeming a policy at the end of its term
- C. Getting a reimbursement from an overfunded policy

• D. Purchasing full-term insurance bonds

#### Answer: C

#### Explanation:

One of the most common methods of money laundering in the insurance industry is to purchase a policy with illicit funds and then request a refund of the premiums, either partially or fully, before the policy matures.

This way, the money launderer can receive a legitimate payment from the insurance company, effectively washing the dirty money. This technique is also known as premium fraud or early surrender12 According to the Financial Crimes Enforcement Network (FinCEN), the most significant money laundering and terrorist financing risks in the insurance industry are found in life insurance and annuity products, because such products allow a customer to place large amounts of funds into the financial system and seamlessly transfer such funds to disguise their true origin34 Some indicators of potential money laundering through insurance products are: 12

- \* The customer pays the premiums with cash, cashier's checks, money orders, or other anonymous or unusual payment methods.
- \* The customer overpays the premiums or makes multiple payments in excess of the required amount.
- \* The customer cancels the policy during the free-look or grace period and requests a refund to a different account or a third party.
- \* The customer purchases a policy that is inconsistent with their income, age, or risk profile.
- \* The customer shows little interest in the benefits or terms of the policy, but is more concerned about the cancellation or surrender options.

#### References:

- \* 1: AML in Insurance: How to Detect & Combat Money Laundering, ComplyAdvantage, 2022
- \* 2: Anti Money Laundering (AML) In Insurance Industry In 2021, Financial Crime Academy, 2023
- \* 3: Money laundering in the insurance industry, Insurance Commission, 2022
- \* 4: Money laundering in the insurance industry, Atty. Dennis B. Funa, Business Mirror, 2016
- \* [5]: Anti-Money Laundering Requirements: FAQs for Insurance Companies, FinCEN, 2005

#### **NEW QUESTION # 161**

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