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40 Recommendation highlights are? - ✓✓

Risk-Based approach.

Designated categories of offenses.

Terrorist financing & financing of proliferation.

Knowledge & criminal liability.

A "Payable-Through Account" PTA is a master correspondent account established at a domestic bank by a foreign bank. The Home-Country Customers of the foreign bank, which is called the "Master Accountholder" are permitted to conduct a wide range of banking transactions through the PTA typically those customers, called "sub-accountholders", can write checks make deposits & withdrawals, & wire funds through the PTA almost as if they were direct, local customers of the US bank. The sub-accountholders, who can number in the hundreds & who rarely have direct contact with the domestic US banks, are given checks by which to draw funds on the PTA. In 1 US case the regulator found that the domestic bank had failed to adequately supervise the PTAs. To implement effective internal control & operating systems concerning PTAs, to establish "Know Your Customer" procedures for Sub-Accountholders & to maintain adequate staffing. The - ✓✓Preparing a "Risk Assessment" about each PTA.

Obtaining a signed document from each Sub-Accountholder subjecting the subaccount to state & federal laws & regulations in spite of any banking secrecy laws of any other jurisdiction.

Preparing a "PTA Action Plan" that examines the adequacy of its capabilities to monitor PTAs & plans to improve them.

Obtaining detailed information from the master account holder about the way it is supervised by its home country agencies.

Conducting periodic verification of the information provided by the foreign bank.

Developing a policy regarding termination of PTA accounts where information it receives is materially inaccurate or incomplete.

A bank in Italy holds a business account for a Italian company that sells gold throughout Europe & the Western Hemisphere. The bank knows the purpose of this account is to receive payment for sales. A review of the account shows a pattern of wire transfers coming from Payable-Through Accounts. There is

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ACAMS Certified Anti-Money Laundering Specialist (CAMS7 the 7th edition) Sample Questions (Q354-Q359):

NEW QUESTION # 354

Which of the following are part of a risk-based approach? (Select Three.)

- A. Choosing and applying effective controls that align with the identified risk levels
- B. Allocating resources equally across all customer segments to ensure fairness
- C. Performing a comprehensive risk assessment to identify customer, transaction, and geographic risks
- D. Focusing monitoring primarily on previously flagged customers while using standard controls for others
- E. Determining detailed risk profiles for customers based on their activities and relationships

Answer: A,C,E

Explanation:

A risk-based approach is central to AML/CFT programs and includes:

- * A: Creating detailed risk profiles for customers based on their behaviors and connections.
- * C: Applying controls that are tailored to the actual risk (not a one-size-fits-all approach).
- * D: Performing a thorough risk assessment, considering customer, transaction, and geographic factors.

"A risk-based approach involves risk profiling, tailored controls, and comprehensive risk assessment across key risk factors."
(CAMS 6th Edition, Risk-Based Approach and Risk Assessment) Incorrect:

- * B: Monitoring only flagged customers is not sufficient.
- * E: Equal allocation of resources ignores differing risk levels.

References:

CAMS 6th Edition, AML Compliance Program

FATF Recommendation 1: Risk-Based Approach

NEW QUESTION # 355

The goal of the Egmont Group of Financial Intelligence Units (FIUs) is to provide a forum for FIUs to:
(Select Three.)

- A. Propose legislation to combat financial crime, including money laundering and the financing of terrorism
- B. Improve global cooperation between FIUs
- C. Establish an environment to foster trust amongst countries
- D. Securely share sensitive information in the fight against money laundering and the financing of terrorism
- E. Sign memoranda of cooperation that recognize and allow room for case-by-case solutions to specific problems

Answer: B,C,D

NEW QUESTION # 356

Which of the following is among the sanctions tools the United Nations Security Council could use that minimize negative effects on innocent civilian populations?

- A. Comprehensive targeted sanctions
- B. Travel bans
- C. Comprehensive sanctions
- D. Targeted sanctions

Answer: D

Explanation:

The United Nations Security Council (UNSC) has evolved its sanctions framework to minimize unintended humanitarian consequences. In line with international best practice, the UNSC increasingly relies on targeted sanctions, also known as "smart sanctions," rather than broad-based measures.

Targeted sanctions are designed to focus specifically on individuals, entities, or activities responsible for threats to international peace

and security. These measures may include asset freezes, travel bans, and arms embargoes directed at specific actors. By narrowing the scope, targeted sanctions aim to reduce the negative impact on innocent civilian populations and legitimate economic activity. In contrast, comprehensive sanctions apply to entire countries or sectors and often result in significant humanitarian and economic harm. The term "comprehensive targeted sanctions" is not a recognized sanctions category.

Therefore, targeted sanctions are the preferred UNSC tool when the objective is to minimize adverse effects on civilians while maintaining pressure on responsible parties.

NEW QUESTION # 357

How should risk-related issues be addressed to ensure the effectiveness of the three lines of defense model?

- A. Delegate some risk-related issues to the first line to avoid overwhelming the second line and to ensure operational efficiency
- B. Assign risk-related oversight duties to the third line to provide an independent review and address issues more effectively by avoiding conflicts of interest in the first and second lines
- C. Ensure that the second line reviews, monitors, and escalates risk-related issues as needed to senior management while maintaining independent oversight from the third line
- D. Have senior management handle risk-related issues directly when possible because they are ultimately responsible for the organisation's overall risk management strategy

Answer: C

NEW QUESTION # 358

A recruitment manager in the human resources department of a bank has shortlisted a candidate for the position of relationship manager in its private banking division. The compliance policy of the bank stipulates that proper background checks on new employees must be completed by the recruiting team to protect the bank against potential risks, including fraud and money laundering.

Which resources would be most useful for identifying any potential negative information regarding the shortlisted candidate? (Select Three.)

- A. Past employment records
- B. Personal resume
- C. Personal references from close associates
- D. Internet and public media searches
- E. Criminal history searches

Answer: E

NEW QUESTION # 359

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