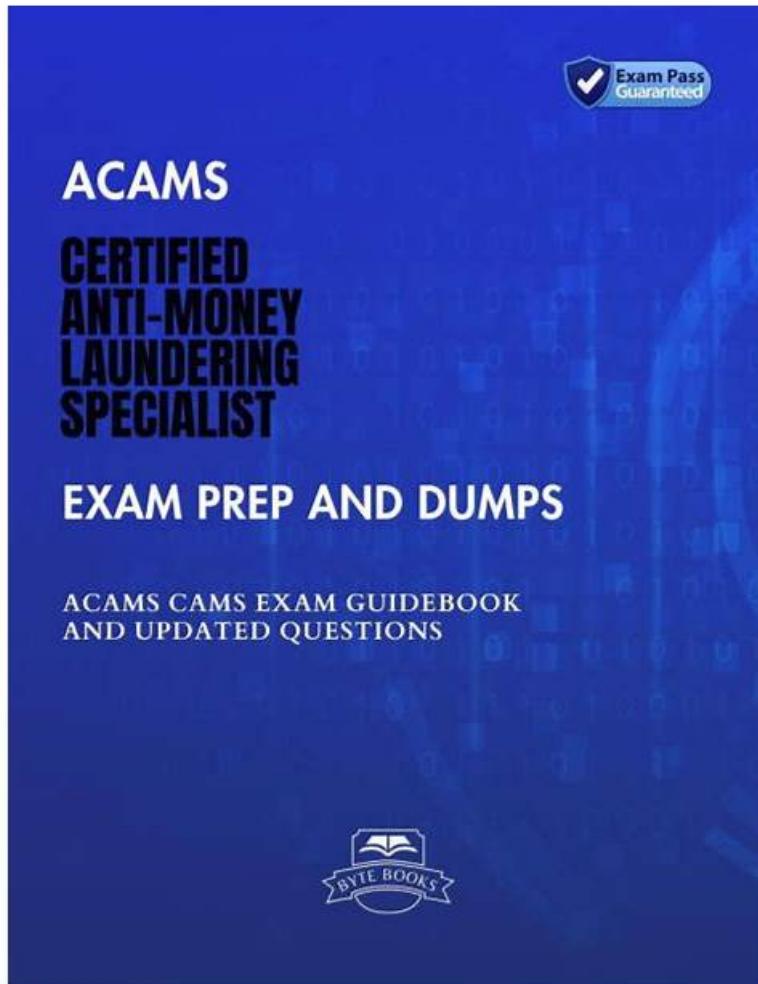


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ACAMS Certified Global Sanctions Specialist Sample Questions (Q92-Q97):

NEW QUESTION # 92

If a financial institution's filtering system generates an alert matching a client to an individual on the Specially Designated National List, which investigation process should the financial institution follow?

- A. If the customer is an individual whose last name matches the alert, but whose first name does not match, the investigation should continue by contacting the customer for more information.
- B. If the customer is an individual with a match on the first and last name, and the country of birth, but not on the country of residence, then there is no need to proceed further with the investigation.
- C. **If the customer is a vessel with the same name, the investigation should continue to establish who is the owner of the vessel.**
- D. If the customer is an unrelated company with the same name, there is no need to proceed further with an investigation.

Answer: C

Explanation:

Sanctions screening standards require that when a hit is produced by the filtering system, the institution must determine whether the alert is a true match or a false positive through a structured escalation and investigation process. The Sanctions and Compliance Domains emphasize that financial institutions must evaluate all relevant identifiers, including entity type, name, ownership, vessel IMO numbers, and additional attributes.

In the case of vessels, sanctions regulations often target vessels by name and ownership, meaning that a vessel with an identical name requires deeper investigation. Authorities such as OFAC, the EU, and the UK regularly designate vessels because of their involvement in sanctioned activities, and vessel names frequently overlap with commercial entities. Therefore, the correct investigative approach is to continue the investigation to determine the true ownership, IMO number, and whether the vessel is the sanctioned party.

Options A, B, and C describe scenarios typically associated with clear mismatches or cases where additional investigation is unnecessary because essential identifiers do not match. However, vessels require continued review due to the regulatory emphasis on vessel ownership, registration, and operational control as determining factors in sanctions risk.

Reference from Sanctions and Compliance Domains:

Requirements for detailed matching processes in sanctions screening.

Guidance on evaluating entity type, ownership, and identifiers when reviewing alerts.

Rules relating to vessel sanctions, ownership determination, and verification steps.

Procedures for identifying true matches versus false positives in sanctions screening.

NEW QUESTION # 93

When effectiveness and externalities do not encourage the use of incentives what can happen?

- A. The economic incentives will be preferred over economic threats
- B. It can punish or reward particular policies
- C. This can affect the effectiveness of the economic statecraft
- D. **The trade-off between political externalities/effectiveness can create provocative dilemmas**
- E. The relative effectiveness of incentives decreases

Answer: D

NEW QUESTION # 94

What happened when the Council applied its first sanctions regime, against the illegal white minority regime in Southern Rhodesia?

- A. The council neglected both Articles 39 and 41.

- B. The Council has tended not to invoke both Articles 39 and 41.
- C. The Council has discontinued acknowledging Article 39.
- D. It expressly invoked both Articles 39 and 41 of the Council as the basis for its action.
- E. The council made a determination of the type envisaged by both Article 39 and 41.

Answer: D

NEW QUESTION # 95

According to the 2019 Wolfsberg Guidance on Sanctions Screening, which is related to the fundamental pillars of sanctions screening programs?

- A. External audit
- B. Risk management
- C. Risk assessment
- D. External reporting

Answer: C

Explanation:

The Wolfsberg 2019 Guidance identifies risk assessment as a foundational component of sanctions screening programs. Screening systems, list management, and alert handling must reflect the institution's assessed sanctions risk exposure.

External audit and reporting are relevant compliance functions but are not listed as fundamental pillars of screening programs in the Wolfsberg framework. Risk management is a broader corporate discipline, while screening specifically starts with a clear sanctions risk assessment.

Reference:

Wolfsberg 2019 Guidance on Sanctions Screening fundamentals.

Requirement that screening be risk-based and aligned with sanctions risk assessment outcomes.

NEW QUESTION # 96

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

Answer: A,D,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 # 97

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