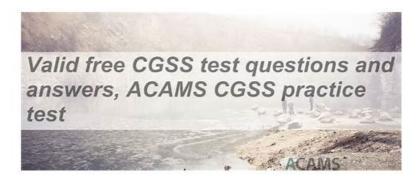
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ACAMS Certified Global Sanctions Specialist Sample Questions (Q72-Q77):

NEW QUESTION #72

"Al-Falah Company", registered in Dubai, wants to open an account at a financial institution. Through due diligence, the compliance team finds out that "El-Fallah Investments", based in Iraq, is under UN sanctions for facilitating terrorism financing. The listed Chief Executive Officer (CEO) of the sanctioned entity is not the same as the CEO of the potential client. How should the compliance team proceed?

- A. This is a near match, thus the client should only be onboarded depending on the financial institution's risk appetite.
- B. The potential client should not be onboarded and the regulator must be notified.
- C. There is insufficient reason to escalate the case for further investigation and the client can be onboarded.
- D. There are enough similarities to pursue further investigation before a decision can be made.

Answer: D

Explanation:

Sanctions and Compliance Domains state that when entities share similar names, regions, or other characteristics with a sanctioned party - even when executive leadership differs - the institution must perform enhanced due diligence to rule out affiliation, ownership, or control links

The similarity in names ("Al-Falah" vs. "El-Fallah"), geographic proximity, and the involvement of UN-sanctioned terrorism-related activity require deeper investigation. Compliance teams must confirm corporate records, ownership structure, purpose, and possible

indirect connections before making a determination.

Automatic rejection is premature without evidence. Onboarding without further investigation is inappropriate.

Reference:

Name similarity and geographic proximity as sanctions escalation triggers.

Requirements for enhanced due diligence when possible indirect links exist.

NEW OUESTION #73

While reviewing a transaction screening alert, an analyst noted that a payment message made reference to a port in a sanctioned country. The payment was to a company based in a country neighboring the sanctioned country. Which action should the analyst take?

- A. Reject the payment and request the remitter to remove any reference to sanctioned country port in the payment message.
- B. Request the underlying documents and shipment details to ensure there is no involvement of a sanctioned party, port, or sanctioned country goods.
- C. Approve the payment since the parties in the payment are not based in a sanctioned country or are not subject to sanctions.
- D. Review if the beneficiary party's country applies sanctions on the neighboring country; if not, the payment can be approved.

Answer: B

Explanation:

Sanctions and Compliance Domains outline that references to sanctioned ports, locations, or shipping routes in payment instructions require further investigation. Even when the transaction parties are not located in a sanctioned jurisdiction, involvement of a sanctioned port or movement of prohibited goods can trigger sanctions exposure.

The correct approach is to obtain supporting documents such as shipping documents, invoices, bills of lading, and routing information to confirm whether the shipment, goods, transport path, or third parties have any sanctioned involvement. Approving or rejecting a payment without verification contradicts sanctions screening standards.

Reference from Sanctions and Compliance Domains:

Requirements to investigate references to sanctioned locations in trade or payment messages.

Guidance on obtaining underlying documents to assess sanctions exposure.

Expectations for verifying goods, ports, and shipment paths.

NEW QUESTION #74

What was the objective of the Commission of Inquiry on Rwanda when again it re-activated?

- A. Follow up its earlier investigations and pursue any further allegations of embargo violations
- B. Investigate allegations of military training received by those forces to destabilize Rwanda
- C. Identify parties supporting and encouraging illegal arms acquisition by former Rwandan government forces, in violation of sanctions
- D. Recommend measures to end the legal flow of arms in the sub-region
- E. In violation of Council Resolutions 918, collect information and investigate reports on the sale or supply of arms and related material to former Rwandan government forces in the Great Lakes region

Answer: A

NEW QUESTION #75

The attorney should confer directly with the client to verify the accuracy of the claims. In McGhee v. Sanilac County, 934 F.2d 89, 93 (6th Cir. 1991), under what circumstances did the appellate court reversed decision not to sanction?

- A. Where attorney neglected to ask the client whether allegedly defamatory statements were actually false
- B. Upon attorney who discussed general content of amended complaint with clients prior to filing but did not inform clients of exact wording of new allegations, which proved to be false.
- C. Where the attorney could not have been reasonably obtained by local counsel
- D. Where attorney certified that he informed both husband and wife as to alternatives under the bankruptcy code and he had in fact only informed the wife.
- E. Where forwarding attorney had not advised them of an earlier adverse ruling.

NEW QUESTION #76

Diplomatic sanctions imposed on a target and parliamentary sanctions applied against a target aim to undermine the official relationship between a target and the outside world.

How do you differentiate these two from one another?

- A. Representative sanctions have the representative of superpowers to give final decisions while diplomatic has no such member
- B. Representative sanctions are associated with national reconciliation or stability while the diplomatic policy is associated with war
- C. Representative targets prohibit flights to and from a target through the diplomatic policy allow flights to and from a target
- D. Representative sanctions are not accepted as state though the diplomatic policy is recognized by the international community
- E. Both are same

NEW QUESTION #77

Answer: D

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