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## ACAMS Certified Cryptoasset Anti-Financial Crime Specialist Examination Sample Questions (Q80-Q85):

### NEW QUESTION # 80

A compliance officer is conducting a customer risk review. Which statements represent the highest level of customer risk? (Select Two.)

- A. A customer who uses a virtual private network (VPN) connection to access the customer's account
- B. A customer receiving cryptoassets daily from another virtual asset service provider located in a foreign jurisdiction which are then sent to a private wallet
- C. A business customer opting to pay suppliers in cryptoassets

- D. A customer located in a foreign country donating 10,000 USD worth of cryptoassets to a charity for veterans in the US
- E. A student customer depositing 15,000 USD over a period of a month, using the funds to purchase cryptoassets that are sent to another virtual asset service provider

**Answer: B,E**

Explanation:

When determining highest-risk customers under a risk-based approach, firms must consider transaction patterns, jurisdictions, counterparties, and destinations:

B: Large deposits by a student, rapidly converting to crypto and sending to another VASP, suggest potential layering and third-party funding risk.

D: Daily inbound transfers from a foreign VASP to a private (unhosted) wallet indicate consistent high-risk exposure - especially cross-border transactions involving unregulated or weakly regulated jurisdictions.

While VPN use (A) can be a red flag, on its own it is lower risk than significant suspicious fund flows. Paying suppliers in crypto (C) can be legitimate for businesses. A large donation to a charity (E) could be flagged depending on jurisdiction and cause, but is generally less inherently suspicious than B and D unless linked to high-risk entities.

FATF, DFSA, and FSRA AML rules stress that ongoing monitoring should identify these high-frequency, high-value, cross-border crypto flows as priority for Enhanced Due Diligence (EDD) and possible Suspicious Transaction Reports (STRs).

### NEW QUESTION # 81

Which blockchain type is accessible only to a single organization?

- A. Hybrid
- B. Private
- C. Consortium
- D. Public

**Answer: B**

Explanation:

Private blockchains are controlled by a single organization with full access restrictions. This model is often used for internal record-keeping but lacks the decentralized trust of public chains.

### NEW QUESTION # 82

Under FATF guidance, "unhosted wallets" are:

- A. Custodial wallets held by third parties.
- B. Wallets where users control private keys directly.
- C. Wallets managed by regulated exchanges.
- D. Wallets with multi-sig security.

**Answer: B**

Explanation:

Unhosted wallets are self-custody wallets controlled directly by the user without third-party oversight, posing higher anonymity and AML risks.

### NEW QUESTION # 83

According to the Financial Action Task Force report, "Virtual Assets Red Flag Indicators", which activity is a red flag related to anonymity?

- A. Making frequent transfers in a certain period of time (e.g., a day, a week, a month) to the same virtual asset account with a well-known virtual asset service provider
- B. Engaging in abnormal transactional activity of virtual assets cashed out at exchanges from peer-to-peer hosted wallets with no logical business explanation
- C. Executing multiple high-value transactions after a period of inactivity from the client
- D. Conducting Bitcoin-fiat currency exchanges at a potential loss

**Answer: B**

Explanation:

Red flags related to anonymity include transactions where virtual assets are cashed out at exchanges from peer-to-peer hosted wallets with no clear business rationale. Such behavior indicates attempts to obscure the origin or destination of funds, characteristic of laundering activities.

Executing high-value transactions after inactivity (A) or frequent transfers to known VASPs (C) may be suspicious but are less directly linked to anonymity. Exchanging at a loss (D) is a different type of red flag.

FATF's red flag indicators list (2021) highlights (B) as a key sign of anonymity-related risk.

#### **NEW QUESTION # 84**

How should an investigator use transaction history to determine whether cryptoassets were previously involved in money laundering?

- A. Assess the jurisdiction where the transactions took place.
- B. Assess other assets held by the cryptoasset owner.
- C. Assess the identity of the cryptoasset owner.
- **D. Assess the cryptoasset addresses' receiving exposure to illicit activity.**

**Answer: D**

Explanation:

In the context of AML/CFT frameworks for cryptoassets, the investigation of transaction histories involves blockchain analysis tools to trace the flow of funds to and from crypto addresses. Specifically, it is essential to assess whether the addresses involved have had prior exposure to illicit activities such as known darknet marketplaces, ransomware payments, or sanctioned entities. This form of "address screening" helps identify potentially tainted cryptoassets.

The DFSA AML Module and associated guidance emphasize that transaction monitoring for cryptoassets requires analyzing the provenance of funds, not just ownership. While identifying the owner is part of customer due diligence (CDD), the transactional exposure itself reveals laundering risks embedded in the chain of transfers.

Extract from DFSA AML Module and COB Module on Crypto Business Rules:

"Transaction monitoring systems must include blockchain analysis to detect suspicious activity related to crypto tokens, including tracing transactions against known illicit sources."

"Enhanced due diligence (EDD) is required when a cryptoasset transaction involves addresses or wallets with a history of illicit activity."

"Risk-based approaches must integrate forensic review of transaction histories to assess financial crime risks in crypto asset transfers" **【AML/VER25/05-24: Sections 6.3, 7.3, 13.3; COB/VER45/05-24: Sections 6.13, 15】** .

Therefore, assessing the receiving exposure of cryptoasset addresses to illicit activity (Option C) is the most direct and effective method to detect laundering.

#### **NEW QUESTION # 85**

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