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ACAMS Certified Anti-Money Laundering Specialists (the 6th edition) Sample Questions (Q464-Q469):

NEW QUESTION # 464

A customer of a bank is an established art dealer. Within the KYC due diligence processes, which constitutes a triggering event that requires ongoing due diligence on this client?

- A. The customer moves their headquarters from New Zealand to China and opens a branch in Malaysia.
- B. The owner wants to exchange foreign currency for an overseas business travel.
- C. The customer keeps adding artwork service providers to the payment beneficiary list.
- D. The customer specializes in art sale and hire, and recently started an art selection consulting service.

Answer: A

Explanation:

The customer's relocation and expansion to different jurisdictions constitutes a triggering event that requires ongoing due diligence on this client, as it may indicate changes in the customer's risk profile, business activities, or beneficial ownership. The bank should update the customer's information, verify the identity and legitimacy of the new entities, and assess the level of money laundering and sanctions risks associated with the new locations¹². The other options are not triggering events, as they are either consistent with the customer's normal business operations or do not affect the customer's risk profile.

Reference:

ACAMS CAMS Certification Study Guide, 6th Edition, Chapter 4, page 931

ACAMS CAMS Certification Video Training Course, Module 4, Lesson 22

NEW QUESTION # 465

A money transmitter's nation-wide agent network remits funds to a country in Africa on behalf of an immigrant community based in the United States. A terrorist group is known to operate openly in this African country. In reviewing transaction records, the compliance officer detects a pattern where two customers together visit the same agent each week and remit the same amount of funds, \$2,500, to the same recipient in the country in Africa.

What should alert the compliance officer to possible money laundering or terrorist financing activity by the two customers?

- A. The funds are being sent to the same recipient each week.
- B. The customers always visit the same agent.
- C. The dollar amount of each transaction is just below the record keeping threshold.
- D. The customers always visit together.

Answer: C

Explanation:

According to the ACAMS CAMS Study Guide, one of the common methods of money laundering and terrorist financing is to structure transactions to avoid reporting or record keeping requirements. Structuring involves breaking down a large amount of cash into smaller transactions that fall below a specified threshold, or using different accounts, agents, locations, or days to conduct the transactions. Therefore, the fact that the two customers remit the same amount of funds, \$2,500, each week to the same recipient in a high-risk country is a red flag for possible money laundering or terrorist financing activity, as it suggests that they are trying to evade the record keeping threshold of \$3,000 for money transmitters in the United States¹².

References:

* ACAMS CAMS Study Guide, 6th Edition, page 27

- * FFIEC BSA/AML Appendices - Appendix F - Money Laundering and Terrorist Financing Red Flags1
- * AML Red Flags - What are the Top 10 Indicators? - ComplyAdvantage2

NEW QUESTION # 466

Which assessments are involved in the processes of mutual evaluation and follow-up by the FATF?

- A. Sanction risk assessments and the country's National Risk Assessment
- **B. Technical compliance assessments and effectiveness assessment**
- C. Risk assessments and technical standards assessments
- D. Country audit assessments and transaction monitoring assessments

Answer: B

Explanation:

The FATF conducts peer reviews of each member on an ongoing basis to assess levels of implementation of the FATF Recommendations, providing an in-depth description and analysis of each country's system for preventing criminal abuse of the financial system. The FATF Methodology for assessing compliance with the FATF Recommendations and the effectiveness of AML/CFT systems sets out the evaluation process.

Assessments focus on two areas, effectiveness and technical compliance. The effectiveness component will assess whether the AML/CFT systems are working, and the extent to which the country is achieving the defined set of outcomes. The technical compliance component will assess whether the necessary laws, regulations or other required measures are in force and effect, and whether the supporting AML/CFT institutional framework is in place.

Mutual Evaluations - Financial Action Task Force

FATF Methodology for assessing compliance with the FATF Recommendations and the effectiveness of AML/CFT systems

Procedures for the FATF Fourth Round of AML/CFT Mutual Evaluations

Reference: [https://www.fatf-gafi.org/publications/mutualevaluations/more/more-about-mutual-evaluations.html?hf=10&b=0&s=desc\(fatf_releasedate\)](https://www.fatf-gafi.org/publications/mutualevaluations/more/more-about-mutual-evaluations.html?hf=10&b=0&s=desc(fatf_releasedate))

NEW QUESTION # 467

A U.K. real estate agent has three foreign clients interested in purchasing an apartment building, valued at £30 million, in the outskirts of London as an investment property. The clients are not willing to have their names provided to the bank. The clients want to purchase to be made in the names of three private companies for privacy reasons. The plan is to wire the funds into an account held in the name of another private company at a bank in London.

Which red flag should stop the agent from discussing this potential purchase further?

- A. The clients are foreign
- B. The clients have the funds necessary to fund a £30 million purchase
- **C. The clients are not willing to have their names provided to the bank**
- D. The clients want to purchase to be made in the names of the private companies

Answer: C

Explanation:

The clients are not willing to have their names provided to the bank is a red flag that should stop the agent from discussing this potential purchase further, as this could indicate that the clients are trying to evade customer due diligence (CDD) or know your customer (KYC) requirements, or hide their beneficial ownership or source of funds. According to the U.K. Money Laundering Regulations 2017, real estate agents must conduct CDD on their customers and any beneficial owners, and verify their identity and address¹. The

U.K. also has a register of people with significant control (PSC) over companies, which requires companies to disclose their beneficial owners². The use of private companies and wire transfers could also be a sign of layering, a money laundering technique that involves moving funds through multiple accounts or entities to obscure their origin³.

References:

1: U.K. Government, Money Laundering Regulations 2017, Part 2: Customer Due Diligence, Section 5-6 2:

U.K. Government, People with significant control (PSC) register, Overview 3: ACAMS CAMS Certification Study Guide, 6th Edition, Chapter 1: Risks and Methods of Money Laundering and Terrorist Financing, Page

NEW QUESTION # 468

Which three procedures should a compliance officer looking to revise an institution's CTF efforts include in accordance with the Wolfsberg Group's Statement on the Suppression of the Financing of Terrorism?

- A. Consulting applicable lists and taking appropriate actions to determine if customers appear on such lists
- B. Reporting matches from lists of known or suspected terrorists to relevant authorities
- C. Maintaining customer information to facilitate timely retrieval of such information
- D. Reviewing only original identification documents when verifying customers

Answer: A,B,C

Explanation:

According to the Wolfsberg Group's Statement on the Suppression of the Financing of Terrorism¹, a compliance officer should include the following three procedures in revising an institution's CTF efforts:

* Consulting applicable lists and taking appropriate actions to determine if customers appear on such lists. This procedure is important to prevent terrorist organizations from accessing the financial services of the institution and to comply with the sanctions and regulations imposed by competent authorities.

The compliance officer should implement procedures for checking the customers against the lists of known or suspected terrorists or terrorist organizations issued by relevant authorities and taking reasonable and practicable steps to verify the identity and status of the customers.

* Reporting matches from lists of known or suspected terrorists to relevant authorities. This procedure is important to assist the authorities in their efforts to detect and disrupt terrorist financing and to fulfill the legal obligations of the institution. The compliance officer should report to the relevant authorities any matches from the lists of known or suspected terrorists or terrorist organizations consistent with the applicable laws and regulations regarding the disclosure of customer information.

* Maintaining customer information to facilitate timely retrieval of such information. This procedure is important to enable the institution to respond promptly and effectively to the enquiries and requests from the authorities and to enhance the quality and accuracy of the customer data. The compliance officer should explore ways of improving the maintenance of customer information to facilitate the timely retrieval of such information.

References:

* Wolfsberg Statement on Anti-Terrorism Financing

UNUSUAL CUSTOMER IDENTIFICATION CIRCUMSTANCES

* Customer furnishes unusual or suspicious identification documents or declines to produce originals for verification."

NEW QUESTION # 469

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