CCAS復習攻略問題、CCAS教育資料

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ACAMS CCAS 認定試験の出題範囲：

トピック	出題範囲
トピック 1	• 暗号資産とブロックチェーンのリスク管理プログラム：このセクションでは、暗号資産セクターに特化したリスク管理フレームワークの開発と実装におけるコンプライアンス・マネージャーとリスク管理担当者の専門知識を評価します。暗号資産関連の金融犯罪リスクの評価、管理策の設計、コンプライアンスの監視、暗号資産エコシステムにおける新たな脅威への適応に関する手順が含まれます。

トピック 2	• 暗号資産とブロックチェーンのためのAML基礎：この試験セクションでは、マネーロンダリング対策（AML）担当者および暗号資産コンプライアンススペシャリストのスキルを評価します。暗号資産とブロックチェーン環境に合わせたAML原則の基礎知識を網羅し、規制の状況、金融犯罪の類型、そして暗号資産に関連するリスクの進化について解説します。
トピック 3	• 暗号資産とブロックチェーン：この分野は、ブロックチェーンアナリストと暗号資産リスクマネージャーを対象としています。暗号資産技術、ブロックチェーンの基礎、そしてそれらの運用特性を理解することに重点を置いています。受講者は、暗号資産の取引フロー、ウォレット、取引所、スマートコントラクト、そしてこれらが金融犯罪防止にもたらす課題について学びます。

ACAMS Certified Cryptoasset Anti-Financial Crime Specialist Examination 認定 CCAS 試験問題 (Q81-Q86):

質問 # 81
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. Conducting Bitcoin-fiat currency exchanges at a potential loss
- C. Engaging in abnormal transactional activity of virtual assets cashed out at exchanges from peer-to-peer hosted wallets with no logical business explanation
- D. Executing multiple high-value transactions after a period of inactivity from the client

正解：C

解説：
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.

質問 # 82
Which FATF Recommendation specifically addresses virtual assets and VASPs?

- A. R.22
- B. R.15

- C. R.12
- D. R.20

正解：B

解説：
FATF Recommendation 15 requires countries to regulate VASPs for AML/CFT purposes, applying the same preventive measures as financial institutions.

質問 # 83
Based on Financial Action Task Force guidance, when a cryptoasset exchange carries out an occasional transaction, the exchange is required to conduct CDD when the transaction is above:

- A. USD/EUR 10000.
- B. USD/EUR 5000.
- C. USD/EUR 15000.
- D. USD/EUR 1000.

正解：A

解説：
FATF guidance sets the threshold for Customer Due Diligence (CDD) on occasional transactions at USD/EUR 10,000 or equivalent. This means that when a cryptoasset exchange processes a one-off transaction exceeding this amount, it must apply appropriate CDD measures.
This aligns with FATF Recommendation 10 and is adopted by DFSA and FSRA frameworks governing virtual asset service providers, ensuring transactions over this limit are subject to identity verification and risk assessment.
Extracts from AML and COB modules emphasize this threshold as the trigger for CDD on occasional transactions to prevent laundering through high-value single transfers.

質問 # 84
Which is a type of restricted blockchain?

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

正解：C

解説：
A restricted blockchain is one where participation-either in transaction validation, data access, or both-is limited to selected entities rather than being open to the public.
Consortium blockchain (D) is a common type of restricted blockchain in which multiple pre-approved organizations collectively manage the network. It offers partial decentralization but with controlled membership, making it suitable for regulated environments such as financial services, supply chain tracking, and interbank settlements.
Other options explained:
Hybrid (A): Combines elements of public and private chains, but not necessarily "restricted" in the strict governance sense.
Public (B): Open to anyone to join, read, and write data; not restricted.
Private (C): While private blockchains are also restricted, in AML/CFT guidance, "restricted blockchain" generally refers to consortium arrangements involving multiple vetted participants, rather than a single organization's closed chain.
Regulatory and technical literature in DIFC/ADGM contexts note that consortium blockchains allow for compliance controls, participant vetting, and transaction monitoring-making them particularly suitable for financial ecosystems where controlled access is essential.

質問 # 85
Which operational risk mitigation practice by virtual asset service providers (VASPs) is most effective when considering their relationships with other VASPs?

- A. Gathering sufficient information on the counterpart VASP to determine the quality of the supervision it receives for transactional activities
- B. Having no requirement to establish a correspondent relationship and build a risk assessment framework among other cryptoasset exchanges prior to transferring for or on behalf of another person
- C. Assigning all such relationships as high risk and conducting enhanced due diligence on all of them
- D. Developing cross-border correspondent relationships with cryptoasset exchanges in jurisdictions that have weak or non-existent anti-money laundering (AML) regulation or supervision

正解：A

解説：
Effective risk mitigation requires VASPs to obtain sufficient information about counterpart VASPs to assess the quality of their regulatory supervision and controls. This helps determine the risk of transactions and build a risk-based framework for correspondent relationships.
Having no requirements (A) or engaging with poorly regulated jurisdictions (B) increases risk. Blanket high-risk classification (C) without proper assessment is inefficient.
FATF Recommendation 15 and DFSA guidance emphasize due diligence on counterparties as a critical control.

質問 # 86
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