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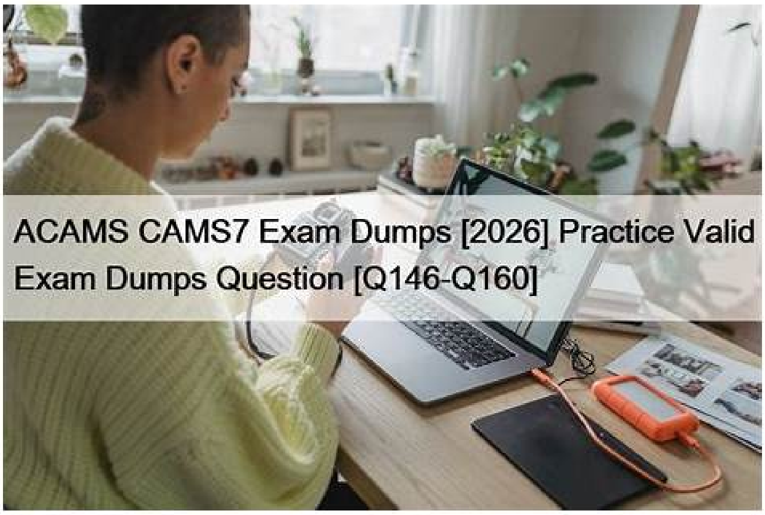

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ACAMS CAMS7 Exam Syllabus Topics:

Section	Weight	Objectives
Money Laundering and Terrorist Financing Concepts	30%	- Global AML/CFT standards • 1. International regulatory frameworks • 2. FATF Recommendations - Definitions and stages of money laundering • 1. Placement, layering, integration • 2. Terrorist financing typologies
Detecting and Preventing Financial Crime	20%	- Investigations and enforcement • 1. Case management and documentation • 2. Regulatory investigations - Financial crime typologies • 1. Fraud and corruption schemes • 2. Trade-based money laundering

Risk Management and Due Diligence	25%	- Transaction monitoring and reporting • 1. Monitoring systems and typologies • 2. Suspicious Activity Reports (SAR/STR) - Customer Due Diligence (CDD/KYC) • 1. Enhanced due diligence (EDD) • 2. Customer identification programs (CIP)
AML Compliance Framework	25%	- Roles and responsibilities • 1. Governance and oversight • 2. Compliance officer duties - Compliance program components • 1. Policies and procedures • 2. Internal controls

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ACAMS Certified Anti-Money Laundering Specialist (CAMS7 the 7th edition) Sample Questions (Q300-Q305):

NEW QUESTION # 300
A financial institution's US Branch receives a subpoena from law enforcement requesting detailed records of a customer's account activity. The customer is part of an ongoing investigation into a money laundering operation. At the same time, the institution has received a FinCEN 314(b) information-sharing request from another bank seeking details on transactions linked to the same customer. The compliance team is tasked with responding to both the subpoena and the FinCEN 314(b) request.
What should the compliance officer prioritize in responding to these requests while ensuring that all legal and regulatory obligations are met?

- A. Consult the institution's legal counsel to validate the subpoena, then respond directly to law enforcement while ensuring all documentation is properly recorded
- B. Notify the customer of the information-sharing request from the other financial institution and seek their consent before responding
- C. Respond to the FinCEN 314(b) request first, as it allows for voluntary information sharing with partner organizations
- D. Provide the requested records to both law enforcement and the other financial institution immediately to ensure full cooperation and transparency

Answer: A

Explanation:
* B: When a subpoena is received, the institution should first consult with legal counsel to ensure the validity and scope of the subpoena. Compliance with law enforcement requests is mandatory and subject to strict legal obligations. All documentation and responses should be properly recorded.
* "A subpoena requires a legal response; consult legal counsel to validate the request and respond as required by law."
* FinCEN 314(b) information-sharing requests are voluntary and can proceed only after fulfilling required legal steps, such as verifying membership in the program and ensuring information-sharing agreements are in place.
* CAMS 6th Edition clarifies that "under no circumstances should a customer be notified of a law enforcement inquiry or subpoena."
References:

CAMS 6th Edition, Law Enforcement Inquiries and Subpoenas
FFIEC BSA/AML Manual, Information Sharing (Sections 314(a) & 314(b))

NEW QUESTION # 301
Potential risk indicators for a trade counterparty in trade-based money laundering include: (Select Three.)

- A. Engaging in transactions and shipping routes or methods that are not in line with standard business practices
- B. Irregular or inconsistent trade volume and frequency that does not align with the historical trading behavior of the counterparty
- C. Contracts, invoices, or other trade documents containing detailed descriptions of the traded commodities
- D. Transparent pricing structures with additional information provided to the receiving bank when pricing fluctuates by ±10%
- E. Cash deposits or other transactions consistently below the relevant reporting thresholds

Answer: A,B,E

Explanation:
Trade-Based Money Laundering (TBML) is a recognized method used to move and disguise illicit funds through trade transactions. Regulatory guidance from FATF highlights several red flags that may indicate TBML risks.
Irregular or inconsistent trade volume and frequency that deviates from a counterparty's historical activity can suggest artificial or manipulated transactions. This behavior may indicate over- or under-invoicing or fictitious trade.
Structuring transactions below reporting thresholds, such as repeated cash deposits just under regulatory limits, is a classic money laundering technique used to avoid detection and reporting obligations.
Engaging in unusual shipping routes, methods, or counterparties that do not align with normal business practices is another key TBML indicator. Criminals often use complex or illogical logistics to obscure the true nature of transactions.
Conversely, detailed trade documentation and transparent pricing with proactive explanations are indicators of legitimate trade activity and reduce AML risk rather than increase it.

NEW QUESTION # 302
Which of the following is a benefit of an institution implementing machine learning to identify suspicious transactions?

- A. Completely unbiased and without error through continuous model training
- B. More consistent and reliable detection outcomes
- C. Transparent and easy to explain algorithms for regulator and compliance purposes
- D. Adaptable to new AFC typologies through continuous model training

Answer: D

Explanation:
A key benefit of machine learning in identifying suspicious transactions is its adaptability to new anti- financial crime typologies through continuous model training, enabling the system to evolve with emerging threats and patterns.

NEW QUESTION # 303
Which regulation is the cornerstone of AML/CFT legislation in the United States and requires financial institutions (FIs) to establish and maintain robust AML programs, including customer identification and due diligence procedures, as well as record-keeping and reporting of certain transactions to the Financial Crimes Enforcement Network (FinCEN)?

- A. Money Laundering Control Act (MLCA)
- B. USA PATRIOT Act
- C. Markets in Crypto-Assets Regulation (MiCA)
- D. Bank Secrecy Act (BSA)

Answer: D

Explanation:
The Bank Secrecy Act (BSA) is the foundational Anti-Money Laundering (AML) and Counter-Terrorist Financing (CFT) law in the United States. Enacted in 1970, the BSA requires financial institutions to establish and maintain effective AML programs designed to detect and prevent money laundering and terrorist financing.
Under the BSA and its implementing regulations, financial institutions must implement key controls such as Customer Identification

Programs (CIP), customer due diligence (CDD), enhanced due diligence (EDD) for higher-risk customers, transaction monitoring, record-keeping, and the filing of Suspicious Activity Reports (SARs) and Currency Transaction Reports (CTRs) with FinCEN.
While the USA PATRIOT Act expanded AML obligations-particularly in relation to terrorist financing-it amended and strengthened the BSA rather than replacing it. The Money Laundering Control Act criminalized money laundering activities but does not establish the operational compliance framework. MiCA is an EU regulation and does not apply in the U.S.
Therefore, the BSA remains the cornerstone of U.S. AML/CFT compliance requirements.

NEW QUESTION # 304
In a large US bank, an individual leads a team in charge of overseeing the governance and effectiveness of the bank's transaction monitoring approach.
Which strategies should the team implement? (Select Two.)

- A. Periodic review of suspicious activity reports (SARs) filed with FinCEN to determine whether any should be withdrawn
- B. Periodic and ad hoc cooperation with the legal team to appropriately investigate and monitor the transactions of subjects of subpoenas or government inquiries
- C. Periodic review of client profiles to ensure that the most up-to-date information is on file for high-risk clients in line with the bank's internal policies and procedures
- D. Periodic review of the transaction monitoring scenarios and their productivity to ensure that appropriate AML typologies are reflected

Answer: C,D

Explanation:
Effective oversight of transaction monitoring includes:
* Periodic review of client profiles to ensure up-to-date information for high-risk clients (B):"Reviewing and updating customer profiles is essential to ensure that monitoring scenarios are based on current risk data."(CAMS 6th Edition, Transaction Monitoring and Customer Due Diligence)
* Periodic review of transaction monitoring scenarios and productivity to ensure appropriate AML typologies are reflected (D):"Firms should periodically review the parameters and output of transaction monitoring systems to ensure they continue to identify relevant ML/TF risks and typologies."(CAMS
6th Edition, Monitoring and Surveillance)
Incorrect Options:
* A: Cooperation with the legal team is important, but not a core strategy for monitoring governance.
* C: SARs filed with FinCEN should not be withdrawn unless new evidence requires it; review should focus on process, not withdrawal.
References:
CAMS 6th Edition, Transaction Monitoring
FFIEC BSA/AML Manual, Transaction Monitoring Section

NEW QUESTION # 305
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