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### ACAMS Certified Global Sanctions Specialist Sample Questions (Q30-Q35):

#### NEW QUESTION # 30

The primary goal of Rule 11 is one of the following choices. Pick the one that is most suitable.

- A. To deny approved complaints and other submissions.
- B. To enhance dismissed allegations and other filings.
- C. To prevent needless lawsuits and other filings.
- D. To enhance the requisite grievances and other files.
- E. To augment unwarranted complaints and other disclosures.

**Answer: C**

#### NEW QUESTION # 31

A US financial institution finds a customer is listed under the Specially Designated Nationals List in the last Office of Foreign Assets Control (OFAC) update. The customer's accounts are immediately blocked. How quickly should the financial institution report this action to OFAC?

- A. 11 business days
- B. 14 business days
- C. 10 business days
- D. 13 business days

**Answer: C**

Explanation:

OFAC requires that reports of newly blocked property be submitted within 10 business days of the blocking action. The institution must provide full details of the blocked property and the sanctioned party. Any timeline other than 10 business days fails to meet OFAC's regulatory reporting requirements.

Reference:

OFAC reporting rule for blocked property within 10 business days.

#### NEW QUESTION # 32

To what degree should human rights feature in the assessment of humanitarian implications of sanctions?

- A. Judgements on the legal obligations of people or entities involved
- B. Charitable funds for humanitarian refugee
- C. 50% of the gross profit should be rendered for humanitarian sympathy
- D. 50% of the gross profit should be rendered for humanitarian sympathy
- E. Safeguarding and upholding any rights under the sanctions regime

**Answer: A,E**

#### NEW QUESTION # 33

The EU-Iran Instrument in Support of Trade Exchange (INSTEX), which allowed EU purchases of Iranian oil after 2018, is an

example of:

- A. a blocking statute.
- B. a general license.
- C. sanctions evasion.
- D. a special purpose vehicle.

**Answer: D**

Explanation:

INSTEX was established by EU member states as an operational mechanism designed to facilitate limited and compliant trade with Iran after the re-imposition of U.S. secondary sanctions in 2018. According to the Sanctions and Compliance Domains, INSTEX is categorized as a special purpose vehicle, created specifically to permit trade transactions without reliance on traditional cross-border payment routes exposed to U.S. sanctions risk.

Special purpose vehicles are defined within sanctions frameworks as structured entities created to conduct or support specific categories of trade or payments where direct financial transfers are restricted or exposed to sanctions risk. INSTEX was designed to match European exporters and importers with Iranian counterparts through a barter-style internal clearing arrangement, avoiding external USD payment flows.

It is not a general license, nor is it a blocking statute. It also does not constitute sanctions evasion because it was formally established, publicly announced, and structured within EU legal parameters. Its purpose was to ensure compliance while maintaining limited humanitarian and permitted trade channels.

Reference from Sanctions and Compliance Domains:

Definitions and characteristics of special purpose vehicles in sanctions environments.

Description of EU mechanisms facilitating compliant trade with sanctioned jurisdictions.

Distinction between SPVs, blocking statutes, and licensing frameworks.

Regulatory context regarding INSTEX as an EU-created structured trade mechanism.

#### NEW QUESTION # 34

Economic sanctions are most likely to accomplish substantial objectives when:

- A. The target is more reliant on the sender than the sender on the target.
- B. The target is least reliant on the sender.
- C. Both are equally dependent on each other.
- D. The sender is more reliant on the target than the target on the sender.
- E. The sender is more reliant on the target than the target on the sender.

**Answer: A**

#### NEW QUESTION # 35

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