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The CGSS exam covers a variety of topics related to global sanctions, including the history of sanctions, the legal framework surrounding sanctions, and the impact of sanctions on various industries. Additionally, the exam covers practical skills such as risk assessment, program management, and the development of effective compliance policies and procedures. CGSS Exam is designed to be challenging and requires a significant amount of preparation in order to achieve a passing score.

ACAMS Certified Global Sanctions Specialist Sample Questions (Q35-Q40):

NEW QUESTION # 35

Which is a key sanctions risk posed by transshipment and intermediary points?

- A. The ultimate recipient of goods and/or their jurisdiction may be unclear.
- B. The submission of all relevant documentation prior to the transshipment.
- C. The large cash amounts readily exchanged at ports.
- D. The collection of data on exposure to intermediary points.

Answer: A

Explanation:

Transshipment and intermediary hubs present sanctions risks because they obscure the true origin, destination, and end-user of goods. High-risk jurisdictions use intermediary shipping points to bypass controls, hide diversion routes, and disguise connections to sanctioned countries or entities.

Documentation may be incomplete, manipulated, or replaced during transshipment, making the true jurisdiction unclear-the core risk.

Reference:

Sanctions evasion via transshipment and intermediary locations.

Risks relating to concealment of end-users and destinations.

NEW QUESTION # 36

In the late spring of 1998, the use or threat of sanctions by the US. Washington and its European partners announced additional steps of economic denial in a collective effort to discourage the escalation of which military force?

- A. German military
- B. Japanese military
- C. Chinese military
- D. Syrian military
- E. Serbian military

Answer: E

NEW QUESTION # 37

An entity that engages in a transaction under a general license issued by the Office of Foreign Assets Control (OFAC) must: (Select Two.)

- A. issue a suspicious activity report.
- B. be sure the transaction is only related to agriculture and medicine.
- C. be sure the transaction is within the scope of the general license.
- D. be sure other conditions comply with relevant sanctions.
- E. apply to OFAC for a specific license to clarify the conditions.

Answer: C,D

Explanation:

Under OFAC regulations, when using a general license:

* The entity must ensure the transaction strictly complies with all conditions in the general license.

* The entity must ensure the activity falls within the scope of the general license.

A general license functions as pre-authorization. If the transaction satisfies its terms, no specific license is needed.

General licenses are not limited only to agricultural or medical activities-those are examples, not universal rules. Suspicious activity reports are not automatically required unless there is separate AML suspicion.

Reference:

OFAC rules governing the use and scope of general licenses.

Compliance obligations for authorized activities.

NEW QUESTION # 38

There has been considerable debate on who, and what agencies, should undertake assessments of the humanitarian implications of sanctions, especially when the sanctions are imposed by which of the following?

- A. National Humanitarian Organization
- B. All of the above
- C. World Health Organization
- D. The United Nations
- E. International Labour Organization

Answer: C

NEW QUESTION # 39

A non-US based manufacturing company exports goods to a country comprehensively sanctioned by the US. The manufacturing company directs payments to its USD-denominated bank account at a non-US bank. Buyer and/or jurisdiction do not appear in the payment order. This is an example of:

- A. missing trader fraud.
- B. sanctions evasion.
- C. permissible activity.
- D. black market peso exchange.

Answer: B

Explanation:

Using a USD-denominated account creates a US nexus, because USD transactions must clear through the US financial system. Routing payments through USD accounts while obscuring the sanctioned jurisdiction or buyer is a known sanctions-evasion technique.

This is especially true in cases involving comprehensive sanctions (e.g., Iran, North Korea, Cuba), where attempts to hide identifying information in payment orders show intent to evade regulatory controls.

Reference:

OFAC guidance on US nexus in USD transactions.

Evasion indicators including concealment of sanctioned jurisdictions or parties.

NEW QUESTION # 40

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