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## ACAMS Certified Anti-Money Laundering Specialist (CAMS7 the 7th edition) Sample Questions (Q50-Q55):

### NEW QUESTION # 50

A company is rapidly expanding into several international markets, including jurisdictions considered high risk in terms of regulatory oversight. The board has requested the Money Laundering Reporting Officer (MLRO) to review and adjust the company's anti-financial crime (AFC) compliance framework to align with the evolving regulatory landscape and expansion strategy. During this process, the MLRO identifies vulnerabilities, particularly in markets with AML deficiencies, and updates the framework to mitigate these risks.

Which element of the AFC compliance program does this process describe?

- A. Transaction monitoring

- B. Governance arrangements
- **C. Risk assessment**
- D. Training and awareness

**Answer: C**

Explanation:

This scenario describes the risk assessment element of an anti-financial crime (AFC) compliance program.

FATF standards require organizations to regularly assess and reassess their money laundering and terrorist financing risks, particularly when there are material changes to business models, geographic exposure, or regulatory environments.

The MLRO's review of the company's expansion into high-risk jurisdictions and identification of vulnerabilities reflects a dynamic and forward-looking risk assessment process. Updating the compliance framework to address identified risks ensures that controls remain proportionate and effective.

Risk assessments form the foundation of the risk-based approach and directly inform decisions on enhanced due diligence, monitoring, governance, and resource allocation. This process is distinct from transaction monitoring, governance arrangements, or training activities, although those elements may be updated as a result of the risk assessment.

#### **NEW QUESTION # 51**

An internal audit team is reviewing the anti-financial crime (AFC) program of its firm. Which of the following attributes of the third line of defense would be most critical to ensure unbiased and effective oversight?

- **A. Independent testing**
- B. Consistency of approach
- C. Qualification of the team
- D. Periodic training of the function

**Answer: A**

Explanation:

Independent testing is critical for the third line of defense to provide unbiased and effective oversight, ensuring that reviews and audits are objective and free from influence by the first or second lines of defense.

#### **NEW QUESTION # 52**

Public-private partnerships (PPPs) that involve the sharing of information between law enforcement authorities, Financial Intelligence Units (FIUs), and the private sector are established to: (Select Two.)

- **A. Exchange operational information between public authorities and obliged entities**
- **B. Exchange strategic information between FIUs and obliged entities**
- C. Exchange strategic information between financial institutions
- D. Create a common database of key information and share analysis of suspicious activities with FATF

**Answer: A,B**

Explanation:

Public-Private Partnerships (PPPs) are collaborative initiatives involving law enforcement, FIUs, and financial institutions. Their objective is to improve the efficiency and effectiveness of the fight against money laundering, terrorist financing, and other financial crimes by sharing both operational and strategic intelligence.

Option A - Exchange operational information between public authorities and obliged entities:

PPPs often facilitate real-time or near-real-time information sharing that supports specific investigations and the detection of suspicious activity, helping financial institutions respond quickly and accurately to ongoing threats.

Option B - Exchange strategic information between FIUs and obliged entities:

Strategic-level intelligence sharing helps financial institutions understand typologies, risk trends, and evolving criminal methods, thereby strengthening their risk assessments and transaction monitoring frameworks.

Option C is incorrect: Strategic information exchange between private institutions is limited and heavily regulated.

Option D is incorrect: FATF does not collect or manage databases of suspicious activity reports; it sets standards and reviews national frameworks.

Reference: ACAMS CAMS Study Guide - 6th Edition, Chapter: Public-Private Partnerships and Information Sharing- Section: Purpose and Function of PPPs in AML/CFT

### NEW QUESTION # 53

An insurance company receives an application for a high-value life insurance policy from a new non-resident client. The payout instruction is linked to an offshore trust in another jurisdiction to which the client has no obvious connection. The client insists on paying premiums via multiple transactions to "avoid bank charges." The client is reportedly unemployed with minimal assets, which is inconsistent with the policy value. Which financial crime risk should the insurance company be most concerned with?

- A. Money laundering
- B. Market abuse
- C. Sanctions evasion
- D. Fraud

**Answer: A**

Explanation:

This scenario presents multiple classic money laundering red flags, particularly within the life insurance sector, which is recognized by FATF as vulnerable to misuse due to its investment and payout features.

The use of an offshore trust in a jurisdiction with no clear link to the customer raises concerns about concealment of beneficial ownership and layering. Criminals frequently use trusts and offshore structures to obscure the origin and destination of illicit funds.

The client's request to split premium payments into multiple transactions to avoid bank charges is indicative of structuring, a known money laundering technique used to evade monitoring and reporting thresholds.

Furthermore, the lack of a legitimate source of wealth or income consistent with the high-value policy is a significant red flag.

Purchasing high-value insurance products with no apparent financial means is a common placement method for laundering illicit proceeds.

While fraud or sanctions evasion could be relevant in other contexts, the combination of structuring, unexplained wealth, offshore structures, and non-residency most strongly indicates money laundering risk.

### NEW QUESTION # 54

A high volume of incoming wire transfers generates an alert about a client. The funds are immediately debited by cash withdrawals and outgoing wire transfers.

Which information should be reviewed first to investigate this alert/case?

- A. Customer profile
- B. Open source information
- C. Adverse media search
- D. Account activity

**Answer: A**

### NEW QUESTION # 55

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