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## ACAMS Certified Global Sanctions Specialist Sample Questions (Q85-Q90):

### NEW QUESTION # 85

According to the Office of Foreign Assets Control 2015 Guidelines, internal lists must be reviewed periodically and: (Select Two.)

- A. at least monthly if regulatory sanction programs are updated.
- **B. when there is an update of enhanced restrictions imposed.**
- C. at least daily if an update of the screening application is installed.
- D. when changes are made to at least 25% of a customer's information.
- **E. when changes are made to existing sanctions target listing information.**

**Answer: B,E**

Explanation:

OFAC's 2015 Guidelines indicate that internal sanctions lists must be updated:

\* when changes occur to sanctions target listing information, and

\* when enhanced restrictions or new requirements are imposed, including new Executive Orders, program changes, or sector restrictions.

OFAC does not mandate monthly reviews, daily reviews following system upgrades, or reviews based on percentage changes in customer data. Updates must correspond to regulatory changes, not arbitrary timelines.

Reference:

OFAC guidance on internal list maintenance and update triggers.

Requirements linked to regulatory modifications and sanctions program developments.

### NEW QUESTION # 86

Economic sanctions are used as a foreign policy tool. UN sanctions are imposed:

- A. to freeze assets, and offenders may be barred from entering the territories of Member States.
- B. by a single country against a targeted entity or a bloc of nations.
- C. to call upon Member States to affect UN decisions.
- **D. to maintain international peace, security, and stability.**

**Answer: D**

Explanation:

UN sanctions are imposed by the UN Security Council as part of its mandate to maintain international peace and security. They are intended to influence behavior, prevent conflict, suppress terrorism, and stabilize global security conditions.

While asset freezes and travel bans are common measures (option D), they are examples, not the fundamental reason for imposing sanctions. Option C describes the overarching purpose.

Reference:

UN Security Council mandate under the UN Charter.

Objectives of UN sanctions in global peace and security.

### NEW QUESTION # 87

Which measures should be incorporated into a comprehensive sanctions framework by a financial institution (FI)? (Select Two.)

- **A. The FI must have a robust screening control program with a clear strategy in place.**
- B. The FI should gather the required information on a best-efforts basis.
- C. The FI's management information reports should be available to everyone.
- **D. The FI should ensure comprehensive training for people involved in the alert clearing process.**
- E. The FI should not consider a broader set of controls for reviewing at a later stage.

**Answer: A,D**

Explanation:

A comprehensive sanctions framework requires well-designed operational controls, including thorough training for staff responsible for alert review and sanctions decision-making. Sanctions and Compliance Domains specify that personnel involved in alert clearing must receive appropriate training to ensure awareness of regulatory expectations, sanctions typologies, and escalation procedures. Additionally, the framework must include robust screening controls supported by documented strategy, governance, list-management processes, alert management rules, and ongoing testing. These elements form core requirements of sanctions compliance programs. Management information reports are restricted to need-to-know distribution, and reliance on "best-efforts" is not compliant. Institutions must implement structured, risk-based controls, not minimal-effort approaches.

Reference:

Requirements for sanctions training and staff competency.

Necessity of a robust sanctions screening program with strategic oversight.

Internal governance and control expectations in sanctions frameworks.

### NEW QUESTION # 88

A sanctions analyst conducts a review of a bill of lading document. Which is considered a red flag?

- A. The payment is received after the goods are shipped.
- B. There is an unwillingness to offer information on the goods' expiration date.
- C. There is a reluctance to offer information on the end use of the item.
- D. The product is compatible with the technical level of the country.

**Answer: C**

Explanation:

A key sanctions-evasion red flag in trade documents is reluctance or refusal to disclose end-use or end-user information. This may indicate diversion to a sanctioned jurisdiction, entity, or prohibited program (e.g., proliferation).

Expiration dates (D) are irrelevant to sanctions. Payment timing and product suitability (A, B) are normal commercial behaviors and not sanctions red flags.

Reference:

Trade-based sanctions-evasion indicators (concealed end-user/end-use).

Red flags involving incomplete or intentionally vague documentation.

### NEW QUESTION # 89

A state's preference for using economic incentives versus sanctions are a function of its policy objectives and the tradeoff between concerns regarding the effectiveness of incentives and the political externalities of their use.

What is the economic statecraft beneficial for?

- A. To achieve a variety of substantive and symbolic objects
- B. To achieve global peace
- C. To buy most land
- D. To achieve a noble prize
- E. Used for money laundering

**Answer: A**

### NEW QUESTION # 90

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