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ACAMS Certified Anti-Money Laundering Specialist (CAMS7 the 7th edition) Sample Questions (Q66-Q71):

NEW QUESTION # 66

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

Answer: B

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 # 67

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

Answer: D

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 # 68

Which of the following is an important factor to consider when setting up an anti-financial crimes (AFC) compliance program governance structure?

- A. Establishing a system of internal controls commensurate with the institution's size and complexity
- B. Designating a qualified board of directors to monitor day-to-day compliance
- C. Establishing clear roles and responsibilities for AFC risk escalations and issues
- D. Ensuring the structure is reviewed by an outside auditor or consultant

Answer: C

Explanation:

One of the core components of a strong AFC (Anti-Financial Crimes) compliance program is establishing clear roles, responsibilities, and lines of accountability, especially for escalating and addressing AFC risks and compliance issues. This governance clarity ensures effective implementation, transparency in decision-making, and timely resolution of compliance concerns.

While external audits (option A) and internal controls (option B) are important, defining governance structure and escalation responsibilities (option D) is a foundational element. Additionally, the board of directors (option C) provides oversight-not day-to-day compliance monitoring.

Reference: ACAMS CAMS Study Guide - 6th Edition, Chapter: Compliance Program Structures - Section: Governance and Oversight Functions

NEW QUESTION # 69

How does the Financial Action Task Force (FATF) measure the effectiveness of a country's efforts to combat money laundering and terrorist financing?

- A. Basel Committee
- B. Mutual evaluation
- C. FATF Evaluation Committee
- D. Series of internal audits followed by reporting to FATF

Answer: C

NEW QUESTION # 70

The Financial Action Task Force (FATF) routinely publishes a catalogue of jurisdictions requiring enhanced monitoring which is commonly called the:

- A. grey list
- B. white list
- C. red notice
- D. yellow notice

Answer: A

NEW QUESTION # 71

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