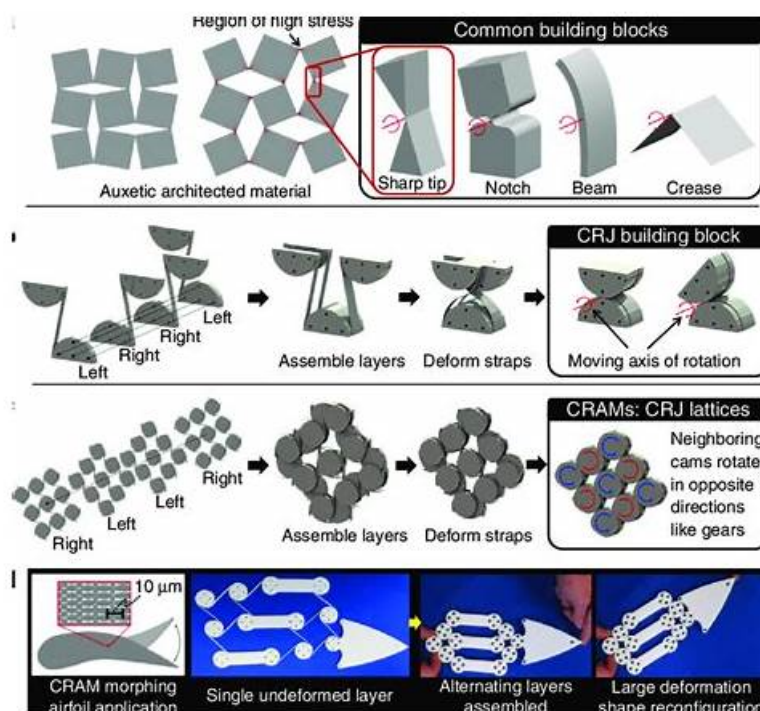


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ACAMS Certified Anti-Money Laundering Specialists (the 6th edition)

Sample Questions (Q767-Q772):

NEW QUESTION # 767

The anti-money laundering specialist of a small bank has identified suspicious activity at a branch located in an area of town where drug dealers are known to operate. An investigation of this activity discloses that the suspicious transactions occurred within the last 3 months and were processed by the same teller (cashier). The teller (cashier) did not file an internal report of unusual activity on these transactions. When checking personnel files, the specialist finds that the teller (cashier) has been a trusted employee for over 15 years, has an impeccable work record, and has participated in several anti-money laundering training sessions. The specialist recently became aware that the employee's daughter has contracted a rare disease and is undergoing a very expensive treatment program. Regarding the teller's (cashier's) failure to report the unusual activity to the institution, the specialist should recommend

- A. Refreshing anti-money laundering training for the teller (cashier).
- B. Continuing to monitor the accounts.
- C. Suspending the teller's (cashier's) employment.
- D. Directing the teller (cashier) to file a suspicious transaction report.

Answer: D

Explanation:

The specialist should recommend directing the teller (cashier) to file a suspicious transaction report (STR). This is because the teller (cashier) has failed to comply with the bank's internal policies and procedures for reporting unusual or suspicious activity, which is a key component of an effective anti-money laundering (AML) program¹. The teller (cashier) should have filed an internal report of unusual activity as soon as he or she noticed the suspicious transactions, regardless of the personal circumstances or the length of service of the customer involved². Failing to do so could expose the bank to regulatory sanctions, reputational damage, or legal liability³.

The other options are not appropriate recommendations for the specialist to make in this situation. Continuing to monitor the accounts is not sufficient, as it does not address the past non-compliance or the potential money laundering risk posed by the suspicious transactions. Refreshing anti-money laundering training for the teller (cashier) is not enough, as it does not ensure that the teller (cashier) will report the suspicious transactions or prevent future violations. Suspending the teller's (cashier's) employment is too harsh, as it does not take into account the teller's (cashier's) long and exemplary work record, the personal hardship faced by the teller's (cashier's) family, or the possibility of remedial actions or corrective measures⁴.

1: Internal Controls | FinCEN.gov 2: Reporting Suspicious Transactions - ACAMS 3: The Consequences of Non-Compliance with AML Regulations - Blog | Unit 2 3 4: Employee Discipline in the Workplace: A Guide for Managers⁴

NEW QUESTION # 768

The Wolfsberg Principles for Private Banking list circumstances that would require additional due diligence, including activities that involve which three of these choices?

- A. Foreign jurisdictions
- B. High Risk Countries, including those identified by credible sources as having inadequate Anti-Money Laundering standards
- C. Public officials, including those individuals who have or had positions of public trust
- D. High Risk activities, involving clients and beneficial owners whose source of wealth originates from activities known to be vulnerable to money laundering

Answer: A,B,D

Explanation:

The Wolfsberg Principles for Private Banking are a set of guidelines for private banking relationships that aim to prevent and detect money laundering and terrorist financing risks. The Principles state that the bank should conduct additional due diligence on clients and beneficial owners in certain circumstances that may indicate a higher risk of money laundering or terrorist financing. Among the options given, A, B, and C are the correct choices that reflect the circumstances listed in the Principles.

Foreign jurisdictions are countries or territories other than the one where the bank operates or where the client or beneficial owner resides. The Principles state that the bank should conduct additional due diligence on clients and beneficial owners who are connected to foreign jurisdictions, especially those that have weak or inadequate anti-money laundering standards, or that are subject to sanctions, embargoes, or similar measures.

High Risk Countries are countries or territories that are identified by credible sources, such as the Financial Action Task Force (FATF), as having inadequate anti-money laundering standards, or as being a source, transit, or destination of illicit funds. The Principles state that the bank should conduct additional due diligence on clients and beneficial owners who are connected to high risk countries, and apply enhanced measures to mitigate the risks.

High Risk activities are activities that involve clients and beneficial owners whose source of wealth or funds originates from sectors or industries that are known to be vulnerable to money laundering, such as cash-intensive businesses, gambling, arms trade, precious metals and stones, or art and antiquities. The Principles state that the bank should conduct additional due diligence on clients and beneficial owners who are engaged in high risk activities, and verify the legitimacy and origin of their wealth and funds.

References: = The main reference for this question is the document titled "Wolfsberg Anti-Money Laundering Principles for Private Banking (2012)" published by the Wolfsberg Group. You can access it by clicking [here](#).

You can also find more information about the Wolfsberg Principles and their application on the Wolfsberg Group website and the Lexology website.

NEW QUESTION # 769

Which is an objective of the Financial Action Task Force (FATF)-Style Regional Bodies (FSRBs)?

- A. To enforce implementation of the FATF recommendations amongst its member countries
- B. To issue their own recommendations, considering local typologies, ignoring the FATF 40 recommendations
- **C. To work in parallel with FATF by operating on the basis of (mutual, joint, or common) recognition of their work**
- D. To work independently from FATF and to be closely involved in improving law enforcement outcomes in their regions

Answer: C

Explanation:

Explanation

To work in parallel with FATF by operating on the basis of (mutual, joint, or common) recognition of their work is an objective of the Financial Action Task Force (FATF)-Style Regional Bodies (FSRBs). FSRBs are regional organizations that have been established by their member jurisdictions to foster implementation of anti-money laundering and counter-terrorist financing standards at a regional level. They are recognized by FATF as associate members and operate on a principle of mutual recognition of their work²

NEW QUESTION # 770

An anti-money laundering specialist is concerned that several suspicious transaction reports will discuss potential illegal activity of bank employees. In this situation, which of the following is the immediate concern for the institution?

- A. The timing of the presentation of suspicious transaction reports to the competent authority.
- **B. Ensuring no delay in informing the Board.**
- C. The type of form to be used when reporting to the Board.
- D. Prohibiting distribution of suspicious transaction report copies to the Board.

Answer: B

Explanation:

According to the BSA/AML Manual¹, a financial institution's board of directors and senior management are ultimately responsible for ensuring that the institution has a comprehensive and effective BSA/AML compliance program and oversight framework. This includes ensuring that the institution timely identifies, reports, and responds to suspicious activity involving its products, services, customers, or employees.

Therefore, when an anti-money laundering specialist is concerned that several suspicious transaction reports will discuss potential illegal activity of bank employees, the immediate concern for the institution is to ensure no delay in informing the board of directors and senior management of the situation, as well as the actions taken or planned to address the risks and mitigate the potential harm. The board and senior management should be kept informed of the status and outcome of any internal or external investigations, as well as any regulatory or law enforcement inquiries or actions, related to the suspicious activity involving bank employees.

References:

BSA/AML Manual¹

Suspicious Activity Reporting - Overview²

Suspicious Activity Report (SAR) Basics³

What's Suspicious? Here's How Banks Apply the Smell Test⁴

NEW QUESTION # 771

What can a compliance officer do in the absence of automated software to conduct U.S. Department of the Treasury Office of Foreign Assets Control (OFAC) sanction screens?

- Answer: D**

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