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## ACAMS Certified Global Sanctions Specialist Sample Questions (Q98-Q103):

### NEW QUESTION # 98

Which steps demonstrate a sound governance framework? (Select Two.)

- A. Senior management reinforces its zero-tolerance for sanctions violations and that it will hold officers directly accountable for any future violations.
- **B. The compliance officer updates the sanctions risk assessment to account for any underlying root cause of a sanctions violation.**
- C. The compliance officer reports to senior management on the sufficiency of the bank's governance framework as confirmed by the lack of penalty.
- **D. Senior management provides the compliance officer access to resources to investigate the underlying cause of a violation.**
- E. The human resources department places a notation in the employee files and accounts for it during performance evaluations.

**Answer: B,D**

Explanation:

A sound governance framework, according to Sanctions and Compliance Domains, includes:

- \* Senior management ensuring adequate resources to investigate violations, identify weaknesses, and remediate control gaps.
- \* Updating the sanctions risk assessment to incorporate findings and root causes from prior incidents.

Human resources actions (A) are not a primary governance function. Reporting based on "lack of penalty" (D) is not a risk-based governance indicator. Zero-tolerance statements (E) do not constitute governance processes and may conflict with risk-based management expectations.

Reference:

Governance expectations under OFAC Framework for Compliance Commitments.  
Requirements for resource allocation and risk assessment updates.

### NEW QUESTION # 99

Who must generally comply with sanctions programs?

- A. Non-nationals outside the jurisdiction of the authority that is imposing the sanction
- B. Individuals and entities globally
- C. International financial institutions
- **D. Individuals and entities located in the jurisdiction of the authority that is imposing the sanction**

**Answer: D**

Explanation:

Sanctions apply primarily to persons and entities within the jurisdiction of the issuing authority. For example:

- \* US sanctions apply to US persons, entities organized under US law, and persons physically located in the US.
- \* EU sanctions apply to EU nationals, persons within EU territory, and EU-incorporated entities.

Sanctions are not automatically global unless other jurisdictions adopt similar measures. International financial institutions must comply only when they operate within relevant jurisdictions.

Reference:

Jurisdictional scope of global sanctions regimes.  
Applicability based on territorial and personal jurisdiction.

### NEW QUESTION # 100

What is the purpose of internal controls according to A Framework for Office of Foreign Assets Control (OFAC) Compliance Commitments? (Select Three.)

- **A. To define procedures and processes**
- B. To minimize the employee attrition rate
- **C. To minimize the risks identified by an entity's OFAC risk assessments**
- **D. To ensure compliance commitments are timely**
- E. To outline clear financial strategies for the company

- F. To outline clear expectations

**Answer: A,C,D**

Explanation:

Internal controls are a core pillar of OFAC's Compliance Framework. They ensure that the organization implements compliance activities on time, maintains documented procedures and processes, and reduces the risks identified in its OFAC risk assessment. The framework specifies that controls must be documented, tested, and capable of identifying, escalating, and addressing sanctions-related issues.

Reference:

OFAC Compliance Framework internal control requirements.

Internal controls as mechanisms to operationalize timely compliance and risk mitigation.

### NEW QUESTION # 101

In which scenarios will the Office of Foreign Assets Control's 50% Rule apply to Entity C? (Select Three.)

- A. Blocked Entity A owns 49.99% of Entity B. Entity B owns 49.99% of Entity C.
- B. Blocked Person X owns 50% of Entity A. Entity A owns 50% (1 share) of Entity C. Blocked Person X owns 1 share directly in Entity C.
- C. Blocked Person X owns 50% (1 share) of Entity A. Entity A owns 50% (1 share) of Entity B. Entity B owns 50% (1 share) of Entity C.
- D. Blocked Entity A owns 50% of Entity B. Entity B owns 50% of Entity C.
- E. Blocked Person X owns 50% of Entity A and 50% of Entity B. Entities A and B own 25% of Entity C each.
- F. Blocked Person X owns 50% of Entity A and 25% of Entity B. Entities A and B each own 25% of Entity C.

**Answer: B,C,D**

Explanation:

The OFAC 50% Rule states:

\* Any entity owned 50% or more - directly or indirectly - by an SDN or SDN-owned entity is itself automatically blocked.

\* Ownership is cumulative through all tiers.

Apply the rule:

✓ A - Blocked Person X has direct + indirect ownership in Entity C exceeding 50% → Blocked.

✓ C - Ownership cascades: SDN → A → B → C; each at 50%. Result: Entity C is blocked.

✓ D - Blocked Entity A (>50%) → owns B (>50%) → owns C (>50%). All downstream entities are blocked.

Not blocked:

\* B = 25% + 25% = 50% but SDN does not directly own A or B - the SDN owns A and B, but A and B each are not blocked themselves because ownership is not aggregated across separate entities unless they hold shares. Therefore, C is not blocked.

\* E = Only 25% flows into Entity C.

\* F = Neither ownership chain reaches 50%.

Reference:

OFAC 50% Rule on direct and indirect ownership.

OFAC guidance on cascading ownership and aggregation requirements.

### NEW QUESTION # 102

ABC Industries is a legal entity owned by Entity X (30%), Entity Y (25%), and Entity Z (45%). Entity X is a Specially Designated National (SDN) under OFAC sanctions, and Entity Y is owned (80%) by an OFAC SDN. Is ABC Industries a blocked entity under OFAC sanctions?

- A. Yes; ABC Industries is a blocked entity due to aggregate ownership (50%) by two OFAC SDNs.
- B. No; ABC Industries is not a blocked entity since it is not listed as an OFAC SDN.
- C. Yes; ABC Industries is a blocked entity due to ownership by one OFAC SDN.
- D. No; ABC Industries is not a blocked entity since aggregate OFAC SDNs' ownership is below 50%.

**Answer: A**

Explanation:

OFAC's 50 Percent Rule requires aggregation of ownership by SDNs and entities owned 50% or more by SDNs.

Ownership breakdown:



myportal.utt.edu.tt, myportal.utt.edu.tt, myportal.utt.edu.tt, myportal.utt.edu.tt, sachinmfxy105244.blogrelation.com, joyceltoc937686.slypage.com, harleybcrb009216.oneworldwiki.com, www.stes.tyc.edu.tw, myportal.utt.edu.tt, myportal.utt.edu.tt, myportal.utt.edu.tt, myportal.utt.edu.tt, myportal.utt.edu.tt, myportal.utt.edu.tt, myportal.utt.edu.tt, myportal.utt.edu.tt, bookmarkssocial.com, www.stes.tyc.edu.tw, extrabookmarking.com, www.stes.tyc.edu.tw, Disposable vapes

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