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## ACAMS Certified Global Sanctions Specialist Sample Questions (Q39-Q44):

### NEW QUESTION # 39

Which of the following are UK government departments and agencies involved in sanctions:

- A. Department for International Trade
- B. HM Treasury
- C. Foreign & Commonwealth Office
- D. HM Revenue & Customs (HMRC)

Answer: A,B,C,D

### NEW QUESTION # 40

The attorney should confer directly with the client to verify the accuracy of the claims. In *McGhee v. Sanilac County*, 934 F.2d 89, 93 (6th Cir. 1991), under what circumstances did the appellate court reversed decision not to sanction?

- A. Where attorney certified that he informed both husband and wife as to alternatives under the bankruptcy code and he had in fact only informed the wife.

- B. Upon attorney who discussed general content of amended complaint with clients prior to filing but did not inform clients of exact wording of new allegations, which proved to be false.
- C. Where forwarding attorney had not advised them of an earlier adverse ruling.
- **D. Where attorney neglected to ask the client whether allegedly defamatory statements were actually false**
- E. Where the attorney could not have been reasonably obtained by local counsel

**Answer: D**

#### NEW QUESTION # 41

Which are key components of a sanctions compliance system model validation? (Select Three.)

- **A. Governance and management oversight**
- B. Automation of repetitive tasks
- C. Multiple system administrators
- **D. Matching algorithms and thresholds**
- **E. Identification of all data sources that require relevant data**
- F. Excess data storage capacity

**Answer: A,D,E**

Explanation:

Sanctions and Compliance Domains explain that model validation for sanctions screening systems must include:

\* Governance and management oversight, ensuring independent review, escalation paths, and proper control structures.

\* Identification and verification of all data sources, ensuring that all required and relevant reference data feeds are included in screening.

\* Matching algorithms and thresholds, which require testing, calibration, and validation to ensure accurate detection of potential sanctions matches.

Storage capacity, automation, or multiple administrators are operational considerations but not core components of model validation.

Reference:

Requirements for model governance and oversight.

Validation of data sources and matching logic.

Threshold testing and system calibration expectations.

#### NEW QUESTION # 42

Where the financial sanction is an asset freeze, it doesn't involve which of the following:

- A. The frozen funds or economic resources are not confiscated or transferred to OFSI for safekeeping
- B. There is no change in ownership of the frozen funds or economic resources
- C. The frozen funds or economic resources are confiscated or transferred to OFSI for safekeeping
- **D. There is a change in ownership of the frozen funds or economic resources**

**Answer: D**

#### NEW QUESTION # 43

Which of the following highlights how the Act is different from Rule 11 as amended in 1993?

- A. The Act does not change the procedure for imposing Rule 11 sanctions and it makes sanctions mandatory, removing any discretion from the district courts
- B. The Act does not presume that the opposing party's attorneys' fees will be the sanction, rejecting the focus on deterrence reflected in Rule 11
- **C. The Act changes the procedure for imposing Rule 11 sanctions and it makes sanctions mandatory, removing any discretion from the district courts**
- **D. The Act presumes that the opposing party's attorneys' fees will be the sanction, rejecting the focus on deterrence reflected in Rule 11**

**Answer: C,D**

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