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ACAMS CAMS-FCI Exam Syllabus Topics:

Topic	Details
Topic 1	<ul style="list-style-type: none">Leading Complex Investigations: This section of the exam measures the skills of senior financial crime investigators and covers advanced techniques for managing and directing intricate financial crime investigations. The four-hour online certificate course delves into strategies for coordinating multi-faceted cases, managing resources effectively, and navigating the complexities of cross-border investigations.
Topic 2	<ul style="list-style-type: none">Financial Crime Typologies Intermediate: This domain is targeted at experienced financial crime analysts and encompasses a four-hour online certificate course that explores various financial crime typologies at an intermediate level. The section covers emerging trends in money laundering, terrorist financing, and other financial crimes.
Topic 3	<ul style="list-style-type: none">Governance of an AFC Investigations Unit: This domain is aimed at compliance professionals who assess candidates' understanding of the governance structures necessary for an effective Anti-Financial Crime (AFC) investigations unit.
Topic 4	<ul style="list-style-type: none">Reporting Suspicious Activity: This section of the exam is designed for Financial Crime and compliance reporting officers and includes a four-hour online certificate course focusing on the intricacies of reporting suspicious activity.

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ACAMS Advanced CAMS-Financial Crimes Investigations Sample Questions (Q65-Q70):

NEW QUESTION # 65

A financial regulator is evaluating the effectiveness of a financial institution's (FI) anti-financial crime program. Which condition should be met to satisfy the regulator?

- A. In the past 3 years, internal auditing results show no high-severity issues and a maximum of three medium-severity and four low-severity issues.
- B. The program is aligned with the financial industry's anti-financial crime priorities.
- **C. The program is drafted using a risk-based approach to avoid the FI being used as a conduit for criminal activities.**
- D. The program meets the minimum requirements of anti-financial crime standards, which are published by a financial industry association.

Answer: C

Explanation:

Explanation

The condition that should be met to satisfy the regulator is that the program is drafted using a risk-based approach to avoid the FI being used as a conduit for criminal activities. A risk-based approach means that the FI identifies, assesses, and understands its exposure to financial crime risks and applies appropriate measures to mitigate them. This is consistent with the international standards and best practices for anti-financial crime compliance. The program being aligned with the financial industry's anti-financial crime priorities, meeting the minimum requirements of anti-financial crime standards published by a financial industry association, or having no high-severity issues in internal auditing results are not sufficient to satisfy the regulator, as they do not necessarily reflect the specific risks faced by the FI or demonstrate its effectiveness in preventing and detecting financial crimes.

References: [Advanced CAMS-FCI Study Guide], page 14-15; [FATF Guidance on Risk-Based Approach for Effective Supervision], page 7-8.

NEW QUESTION # 66

The intended benefits of section 314(b) of the USA PATRIOT Act include: (Select Three.)

- A. expediting the filing of SARs/STRs due to the information sharing facilitated by 314(b).
- **B. participating FIs sharing information about suspicious activity by customers that may have otherwise gone unnoticed.**
- **C. detecting money laundering and TF approaches and schemes across multiple financial institutions (FIs).**
- D. providing mandatory results to law enforcement agencies so that they can more easily obtain useful information.
- **E. obtaining additional information on customers or transactions regarding potential money laundering or terrorist financing (TF).**
- F. sharing the existence and content of SARs/STRs with other participating FIs.

Answer: B,C,E

Explanation:

Explanation

Section 314(b) of the USA PATRIOT Act allows financial institutions to share information with each other, under a safe harbor that offers protection from liability, in order to better identify and report potential money laundering or terrorist financing activities. The intended benefits of this information sharing include:

Participating financial institutions sharing information about suspicious activity by customers that may have otherwise gone unnoticed. For example, if a customer is conducting transactions with multiple financial institutions that individually do not appear suspicious, but collectively indicate a pattern of money laundering or terrorist financing, the financial institutions can share this information and report it to the authorities.

Detecting money laundering and terrorist financing approaches and schemes across multiple financial institutions. For example, if a financial institution identifies a new typology or modus operandi of money laundering or terrorist financing, it can share this information with other financial institutions to help them prevent or detect similar activities by their customers.

Obtaining additional information on customers or transactions regarding potential money laundering or terrorist financing. For example, if a financial institution has incomplete or insufficient information on a customer or a transaction that raises suspicion, it can request more information from another financial institution that may have dealt with the same customer or transaction.

References:

Section 314(b) | FinCEN.gov

Section 314(b) Fact Sheet - FinCEN.gov

NEW QUESTION # 67

A client with many personal and business deposits with the financial institution (FI) seeks a business loan. The client wants to guarantee the loan with a trust for which they are the beneficiary.

An investigator examines the trust. The trust has many layers, including shell companies in known tax havens.

The client's ultimate beneficial ownership claim cannot be validated, and the loan is denied.

Two months later, the FI receives a law enforcement (LE) request on one of the client's business accounts.

While reviewing the business account, the FI receives another LE request on the same account from another agency. The requested information is shared.

Three months later, a branch manager receives a request to open a business deposit account related to a complex trust. The manager forwarded the request because of the complexity. The trust was the same as the previously examined trust, but the request came from a different client. The second client also has many accounts with the FI. Further inspection finds links between the second client and the Paradise Papers. The Papers state the client led illegal activities and committed tax evasion.

What steps should the investigator take to review the accounts held by the second client who is listed in the Paradise Papers? (Select Two.)

- **A. Monitor all accounts and entities related to the second client**
- **B. Recommend a SAR/STR be filed regarding the second client's use of a questionable trust to open an account.**
- C. Inform FI management of deficiencies in their AML program because the second client's activities were not detected.
- D. Review all accounts being reviewed by AML investigators over the past year that have opened trust accounts.
- E. Inform FI management of the start of a serious risk-based investigation that could result in losses and reputation risk.

Answer: A,B

Explanation:

Explanation

The investigator should recommend a SAR/STR be filed regarding the second client's use of a questionable trust to open an account, as this could indicate an attempt to conceal the source and ownership of funds, and to evade taxes and sanctions. The investigator should also monitor all accounts and entities related to the second client, as they may be involved in illegal activities or pose a high risk to the FI. The investigator should not review all accounts that have opened trust accounts, as this would be too broad and inefficient. The investigator should not inform FI management of deficiencies in their AML program, as this is not their role or responsibility. The investigator should not inform FI management of the start of a serious risk-based investigation, as this may compromise the confidentiality and integrity of the investigation.

NEW QUESTION # 68

An investigator at a financial institution (FI) receives an automated transaction alert based on average KYC data within the institution.

Client name	Risk rating	Profession	Country of Tax Residence	Annual Income as per KYC	Monthly Transaction Volume (Month 1)	Monthly Transaction Volume (Month 2)	Monthly Transaction Volume (Month 3)	Average Monthly Spending
Mike Jacob	Low	Accountant	Cyprus	\$ 45,000	\$ 3,251.00	\$ 8,777.70	\$11,378.50	\$ 525.00
Carl Ahmad	High	Car Dealer	Cyprus	\$ 350,000	\$ 9,333.33	\$12,600.00	\$10,360.00	\$ 6,708.33
Farah Zein	Medium	Owner of Travel Agency	Cyprus	\$ 180,000	\$ 4,800.00	\$ 6,480.00	\$ 5,328.00	\$ 4,200.00
Henry Lock	High	Owner of Jewelry Store	Cyprus	\$ 630,000	\$ 16,800.00	\$36,960.00	\$18,648.00	\$ 9,975.00
Jason Right	Low	Teacher	Cyprus	\$ 62,000	\$ 1,653.33	\$ 2,232.00	\$ 1,835.20	\$ 1,395.00
Nadine Kien	High	Trader	Cyprus	\$ 280,000	\$ 7,466.67	\$ 10,080.00	\$ 8,288.00	\$ 5,600.00
May Clous	Low	Employee at a bank	Cyprus	\$ 54,000	\$ 1,440.00	\$ 1,944.00	\$ 1,598.40	\$ 765.00
Richard Aston	Medium	Hotel Manager	Cyprus	\$ 120,000	\$ 3,200.00	\$ 4,320.00	\$ 3,552.00	\$ 1,800.00
Mason Jacob	High	Ecommerce business owner	Cyprus	\$ 430,000	\$ 11,466.67	\$15,480.00	\$28,666.67	\$ 9,316.67
Joshua White	Low	Manager at engineering company	Cyprus	\$ 90,000	\$ 2,400.00	\$ 3,240.00	\$ 2,664.00	\$1,470.00

During a review of the accounts related to Richard Aston, an investigator notices a high number of incoming payments from various individuals. They also notice that these incoming payments typically occur during large sporting events or conferences. As a result of the account review, of which illegal activity does the investigator have reasonable grounds to suspect Richard Aston?

- A. Sports betting
- **B. Aftermarket sales of entertainment admission tickets**
- C. Human trafficking
- D. Embezzling from the hotel

Answer: B

Explanation:

Explanation

The illegal activity that the investigator has reasonable grounds to suspect Richard Aston of is aftermarket sales of entertainment admission tickets. This is because aftermarket sales of entertainment admission tickets involve reselling tickets for events, concerts, festivals, etc. at a higher price than their face value, often through online platforms or scalpers. This practice can be illegal or unethical, depending on the jurisdiction and the terms and conditions of the original ticket seller. The investigator should look for indicators of aftermarket sales of entertainment admission tickets, such as high volume or frequency of incoming payments from various individuals, correlation between incoming payments and major events or conferences, and discrepancy between the customer's profile and the nature of the transactions. The other options are incorrect because:

A: Embezzling from the hotel is not likely, as it would involve stealing money or property from the hotel by an employee or a person in a position of trust. There is no evidence that Richard Aston works for or has access to the hotel's assets.

C: Human trafficking is not probable, as it would involve exploiting people for forced labor or commercial sexual exploitation. There is no indication that Richard Aston is involved in any form of human trafficking or has any connection to victims or perpetrators.

D: Sports betting is not plausible, as it would involve wagering money on the outcome of sporting events or games. There is no sign that Richard Aston is engaged in any sports betting activity or has any association with bookmakers or gamblers.

References:

Advanced CAMS-FCI Certification | ACAMS, Section 2: Investigating Financial Crimes, page 10 TicketSwap: The safest way to

buy and sell tickets Ticketing 101 | Ticketmaster
10 Types of Tickets For Events (+ Why & When To Use Them) - Eventbrite

NEW QUESTION # 69

Which might suggest misuse of crowdfunding resources by a terrorist?

- A. Multiple small deposits followed by the purchase of airplane tickets >
- B. A large deposit followed by multiple charges at a sporting goods store
- C. Multiple small deposits followed by a wire transfer to a large well-known international charity
- D. A small charge at a gas station followed by a large charge at an electronics store

Answer: A

Explanation:

Explanation

The purchase of airplane tickets after receiving multiple small deposits from a crowdfunding platform might suggest that the funds are being used to facilitate travel for terrorist purposes. The other options are not necessarily indicative of terrorist financing, as they could be explained by legitimate reasons or other types of financial crimes.

NEW QUESTION # 70

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