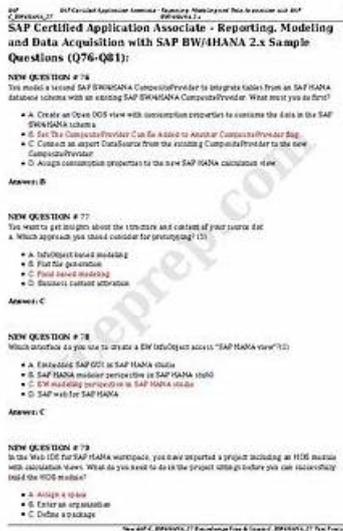


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ACAMS Certified Anti-Money Laundering Specialist (CAMS7 the 7th edition) Sample Questions (Q275-Q280):

NEW QUESTION # 275

In a large US bank, an individual leads a team in charge of overseeing the governance and effectiveness of the bank's transaction monitoring approach.

Which strategies should the team implement? (Select Two.)

- A. Periodic review of client profiles to ensure that the most up-to-date information is on file for high-risk clients in line with the bank's internal policies and procedures
- B. Periodic review of the transaction monitoring scenarios and their productivity to ensure that appropriate AML typologies are reflected
- C. Periodic and ad hoc cooperation with the legal team to appropriately investigate and monitor the transactions of subjects of subpoenas or government inquiries
- D. Periodic review of suspicious activity reports (SARs) filed with FinCEN to determine whether any should be withdrawn

Answer: A,B

Explanation:

Effective oversight of transaction monitoring includes:

Periodic review of client profiles to ensure up-to-date information for high-risk clients (B): "Reviewing and updating customer profiles is essential to ensure that monitoring scenarios are based on current risk data." (CAMS 6th Edition, Transaction Monitoring and Customer Due Diligence) Periodic review of transaction monitoring scenarios and productivity to ensure appropriate AML typologies are reflected (D): "Firms should periodically review the parameters and output of transaction monitoring systems to ensure they continue to identify relevant ML/TF risks and typologies." (CAMS 6th Edition, Monitoring and Surveillance) Incorrect Options:

A: Cooperation with the legal team is important, but not a core strategy for monitoring governance.

C: SARs filed with FinCEN should not be withdrawn unless new evidence requires it; review should focus on process, not withdrawal.

References:

CAMS 6th Edition, Transaction Monitoring

FFIEC BSA/AML Manual, Transaction Monitoring Section

NEW QUESTION # 276

Which of the following indicators of potentially suspicious activity are commonly associated with high-risk business sectors and structures such as shell companies? (Select Three.)

- A. Knowing the goods or services, if identified, do not match the profile of the company or the nature of the financial activity
- B. Insufficient or no information is available to identify originators or beneficiaries of funds transfers through searches or direct inquiries
- C. A company regularly conducts large-volume transactions in a medium-risk jurisdiction with longstanding business partners and provides complete documentation and audit trails
- D. Payments have no stated purpose, do not reference goods or services, or only reference a contract or invoice number
- E. All payments are in smaller amounts below reporting thresholds but are high when aggregated while still being consistent with standard business practices

Answer: A,B,D

Explanation:

Shell companies and other high-risk business structures are commonly associated with money laundering schemes designed to obscure ownership and transaction purpose. FATF guidance identifies several red flags indicative of such misuse.

A mismatch between goods or services and the company's stated business profile suggests fictitious or manipulated transactions.

Insufficient information on originators or beneficiaries of funds transfers further increases suspicion, as transparency is a core AML requirement. Additionally, payments lacking a clear purpose or meaningful description may indicate layering or attempts to conceal illicit activity.

Conversely, well-documented transactions with established partners and legitimate audit trails are indicators of lower risk. While structuring below reporting thresholds can be suspicious, it must also be inconsistent with standard business practices to qualify as a red flag.

NEW QUESTION # 277

Which of the following are important AML controls for a compliance manager of a regulated asset management company in the European Union to implement? (Select Two.)

- A. Performing negative news checks of prospective customers
- B. Inviting prospective customers for an onboarding interview
- C. Rejecting any politically exposed persons (PEPs) as customers
- D. Understanding the source and origin of assets
- E. Producing financial stability reports on interesting customers

Answer: A,D

Explanation:

* Understanding the source and origin of assets (C): According to the CAMS 6th Edition (Chapter: Customer Due Diligence and Enhanced Due Diligence) and the EU 4th & 5th AML Directives, regulated entities are required to take adequate measures to understand the source of funds and the origin of assets of their customers, especially when there are higher risk factors such as large transactions or PEPs. "Firms must identify the source and origin of assets to ensure they are not the proceeds of crime or corruption, particularly for higher-risk customers." (CAMS 6th Edition, CDD/EDD Requirements; EU Directive 2015/849, Article 20)

* Performing negative news checks of prospective customers (D): Adverse media screening is an essential part of the onboarding process for identifying potential risks related to money laundering, terrorist financing, or reputational harm. "Negative news or adverse media checks form a vital component of the due diligence process, helping organizations detect links to criminal or suspicious activities." (CAMS 6th Edition, CDD/EDD Requirements)

Incorrect Options:

- * A: Onboarding interviews may be part of EDD, but are not a standard or required AML control.
- * B: PEPs are not to be automatically rejected; instead, enhanced due diligence should be applied.
- * E: Producing financial stability reports is not an AML control, but may be relevant for credit or investment assessment.

References:

CAMS Study Guide 6th Edition, Customer Due Diligence

EU 4th AML Directive (Directive 2015/849/EU)

EU 5th AML Directive (Directive 2018/843/EU)

NEW QUESTION # 278

An institution is looking to alter an existing threshold-based monitoring scenario because it is generating too many alerts that do not yield suspicious activity reports.

Documentation submitted to the relevant committee for supporting this proposal should include details on: (Choose three.)

- A. how many resources are spent on the less productive lower threshold and the associated costs.
- B. the number of cases that will not be filed and the resources that can be freed up for other tasks.
- C. minutes of meeting held with the regulator where agreement was obtained that the higher threshold was justified.
- D. historical analysis proving that the current scenario generates a disproportionate number of false positives.
- E. evidence that the increased residual risk arising from the change is within the bank's risk appetite.
- F. approval by money-laundering reporting officer for the proposal.

Answer: A,D,E

Explanation:

The documentation should include evidence that the residual risk remains within the bank's risk appetite, analysis of resources spent and costs associated with the current lower threshold, and historical data showing the high false positive rate to justify altering the threshold while maintaining effective risk management.

NEW QUESTION # 279

Which of the following statements is true regarding Office of Foreign Assets Control (OFAC) sanctions? (Select Two.)

- A. Blocked funds must be placed into an interest-bearing account on a financial institution's books
- B. Sanctions can only be placed on certain individuals in foreign countries as designated by OFAC
- C. Sanctions can be either comprehensive or selective using the blocking of assets and trade restrictions to accomplish foreign policy and national security goals
- D. OFAC sanctions automatically expire after five years unless renewed by Congress

Answer: A,C

Explanation:

OFAC sanctions are a key element of the U.S. AML/CFT framework. According to the CAMS 6th Edition and OFAC regulations: Blocked funds must be placed into an interest-bearing account on a financial institution's books (B): "Blocked property must be held in a separate interest-bearing account on the books of the U.S. financial institution." (CAMS 6th Edition, Sanctions Compliance; OFAC FAQs) Sanctions can be either comprehensive or selective using the blocking of assets and trade restrictions (C): "OFAC administers both comprehensive and targeted (selective) sanctions programs to fulfill U.S. foreign policy and national security goals." (CAMS 6th Edition, Sanctions Compliance) Incorrect Options:

A: OFAC can sanction entities, vessels, and organizations-not just individuals or those in foreign countries.

D: There is no automatic expiration of OFAC sanctions after five years.

References:

CAMS 6th Edition, OFAC and Sanctions Programs

U.S. Treasury, OFAC FAQs

NEW QUESTION # 280

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