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## ACAMS Certified Global Sanctions Specialist Sample Questions (Q99-Q104):

### NEW QUESTION # 99

In the event of a sanctions violation, the inclusion of a sanctions clause in a trade contract can:

- **A. define which sanctioned elements are prohibited in the execution of the contract.**
- B. act as a specific license allowing the contract to be fulfilled.
- C. identify the liability for any fines related to sanctioned entities.
- D. enforce the contract if sanctions are imposed on any of the parties.

**Answer: A**

Explanation:

Sanctions and Compliance Domains state that sanctions clauses in trade contracts are used to:

- \* clarify prohibited activities,
- \* define obligations of the parties in case sanctions become applicable, and
- \* ensure business partners understand compliance expectations.

A sanctions clause cannot enforce a contract when sanctions apply (B), cannot assign liability for regulatory fines (C) beyond legal requirements, and cannot operate as a license (D). Only regulators (e.g., OFAC, EU authorities) can authorize activities by issuing licenses.

Reference:

Trade contract sanctions clauses and their function.

Legal requirements surrounding sanctions clauses and regulatory authority.

#### NEW QUESTION # 100

A person is designated by the UK and EU. This person owns and controls a company with subsidiaries in diversified industries. Which scenario presents a warning sign for sanctions evasion?

- A. Changes in corporate strategy to diversify further into different industries
- B. Opening of bank accounts in jurisdictions with no alignment to UK and EU sanctions
- **C. Transfer of assets to family members or close associates**
- D. Cessation of trading or operational activities in some subsidiaries

**Answer: C**

Explanation:

Sanctions and Compliance Domains highlight that sanctioned individuals may attempt to evade restrictions by transferring assets, ownership rights, or operational control to family members or close associates. These transfers may appear legitimate but are often structured to conceal continuing beneficial ownership or influence.

Asset transfers to relatives or trusted associates are recognized as classic sanctions evasion red flags across EU and UK ownership and control guidance.

Opening bank accounts in non-aligned jurisdictions may create exposure, but the specific red flag of evasion is the movement of assets to associates. Changes in corporate strategy or reduced trading activity are not inherently indicative of sanctions evasion.

Reference:

UK and EU ownership/control evasion typologies.

Sanctions evasion red flags involving relatives and close associates.

#### NEW QUESTION # 101

Which has an obligation to accept and carry out UN Security Council Resolutions?

- A. Only members of the Security Council
- B. Only permanent members of the Security Council
- **C. All members of the UN**
- D. Only countries that are targets of the resolution

**Answer: C**

Explanation:

Under the UN Charter, all United Nations member states are obligated to accept and carry out decisions of the UN Security Council. Sanctions and Compliance Domains emphasize that UN Security Council Resolutions issued under Chapter VII are binding on all UN members, not just Security Council members or targeted states.

Only member states have this obligation. Permanent membership or targeted status does not change the scope of obligation.

Reference from Sanctions and Compliance Domains:

UN Charter obligations for all Member States to implement Security Council Resolutions.

Binding nature of Chapter VII resolutions across all UN members.

#### NEW QUESTION # 102

The Office of Foreign Assets Control has designated which types of high-risk persons or entities in the digital asset ecosystem? (Select Three.)

- A. Credit unions
- B. Software developers
- **C. Mixers**
- D. Central banks
- **E. Persons hacking and stealing cryptocurrency**
- **F. Cryptocurrency exchanges**

**Answer: C,E,F**

Explanation:

OFAC has designated:

\* Hackers and cyber actors involved in cryptocurrency theft.

\* Cryptocurrency exchanges facilitating illicit transactions or supporting sanctioned jurisdictions.

\* Mixers (tumblers) known to anonymize blockchain transactions and facilitate laundering and sanctions evasion.

Software developers (D) are generally not designated unless directly linked to illicit activity. Credit unions and central banks are not typical OFAC digital-asset designations.

Reference:

OFAC digital asset designations (e.g., mixers, DPRK cyber actors).

Sanctions risk indicators in the virtual currency sector.

### NEW QUESTION # 103

Who must generally comply with sanctions programs?

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

**Answer: A**

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 # 104

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